



FOOD PRODUCTS & PROCESSING RULES

Guidelines n°30:

RULES ON THE ORGANIC PRODUCTION OF PROCESSED FOODS

According to Ecocert Organic Standard (EOS)

These guidelines apply to all food products; with regards to animal feed, please refer to EC Guidelines no.26.



I. General Rules

In order for "organic farming" certification to be granted for processed foodstuffs, products have to meet specific requirements with regards to the ingredient list and end-users. The mandatory submission for approval of the ingredient list encompasses several stages:

A. Stage 1: The designated product is a food product

When foodstuffs have been processed, organic certification as per EOS may be granted providing the products are intended for human consumption (i.e. foodstuffs).

Therefore EOS does not apply to non-food products (such as textiles, cosmetics, building materials...) which have been processed from organic farming raw materials; products may be eligible for organic certification according to private standards.

Definition of 'Food' as per Article 2 of EU Regulation no.178/2002:

"Food" (or "foodstuff") means any substance or product, whether processed, partially processed or unprocessed, intended to be, or reasonably expected to be ingested by humans.

"Food" includes drink, chewing gum and any substance, including water, intentionally incorporated into the food during its manufacture, preparation or treatment.

NB: Other processed products which may be eligible for organic certification are organic feed for livestock (cattle, sheep, goat, equine, porcine, poultry) or aquaculture animals. The guidelines do not apply to these products (see Guidelines N° 26).

Wines and derivatives (ex: wine vinegar) are food but they have a special status. Please refer to specific Guidelines N° 34 for these products.

B. Stage 2: The product is mainly of agricultural origin

The product is mainly produced from ingredients of agricultural origin; water and salt added in the handling process are not taken into account.

EOS defines 2 types of ingredients:

- ✓ Ingredients of agricultural origin: raw materials may be of plant and/or animal origin



- ✓ Ingredients of non-agricultural origin: any other substances (water, salt, enzymes, ferments, yeast, food additives, processing aids, flavouring, added nutrients)

Therefore, ingredients of agricultural origin and ingredients of non-agricultural origin have to be listed separately and proportion of farmed product (calculation based on net weight) must be measured out without taking into account salt and water:

- COMPLIANT:

Ingredients of agricultural origin > Ingredients of non-agricultural origin

- NON-COMPLIANT:

Ingredients of agricultural origin < Ingredients of non-agricultural origin

Excluding water and salt from measurement means that products for which ingredients are predominantly water-based (ex: beer, soup, cordial) or salt-based (ex: herb flavoured salt, stock cube) may be eligible for organic certification (providing ingredients are predominantly farm produced once water and salt has been removed).

C. Stage 3: Listing organic and non-organic forms

An organic recipe must not include simultaneously organic and non-organic forms of the same ingredient.

For example, the ingredients list of a food product including organic cane sugar and caramel made out of non-organic cane sugar, is not organic compliant.

D. Stage 4: Use of ingredients of non-agricultural origin

Only certain ingredients of non-agricultural origin may be allowed as part of the composition: THE APPROVED LIST OF INGREDIENTS IS EXHAUSTIVE AND CANNOT BE DEPARTED FROM. Whatever its percentage, however small it might be, if non-approved ingredient of non-agricultural origin is used in processing, the final product shall not be eligible for organic certification and therefore no reference to the organic production method may be used on the label.

The approved ingredients of non-agricultural origin are mentioned in Chapter (C).2.b) of Title V in EOS :



1. Food additives (including carriers) as listed in Annex VIII.A

The list of food additives is provided in tabular form and includes their respective European code number. With regards to their use, a clear distinction is made between foodstuffs of plant origin and foodstuffs of plant animal origin.

For certain additives, specific conditions of use also apply:

For example, *non-amidated-pectin (E 440i)* may be used for preparation of all food products of plant origin (for ex. jam) but only in milk-based products for preparation of food products of animal origin.

2. Processing aids as listed in Annex VIII.B

The list is based on the same principle as the previous additives list with a distinction being made between foodstuffs of plant origin and foodstuffs of plant animal origin and also specific terms of use.

For example:

- *sulphuric acid* may be allowed as a processing aid exclusively for sugar or candelilla wax production as far as food products of plant origin are concerned and exclusively for gelatine production as far as food products of animal origin are concerned.

3. Preparation of micro-organisms and enzymes

Preparations of micro-organisms and enzymes may be used in food processing (be careful with non GM guarantees).

However, enzymes to be used as food additives are to be listed in Annex VIII.A (for example, although *invertase E 1103* and *lysozyme E 1105* are considered as additives their use is not allowed in the preparation of food products, as they are not listed as approved substances in Annex VIII.A).

4. Natural flavourings

Natural flavouring substances or flavouring preparations as defined in R(EC) N° 1334/2008 (artificial flavouring substance, thermal process flavouring and smoke flavouring are not allowed).

Whereas natural flavourings are allowed in all cases, it is a different matter for food colourings, including natural ones. With the exception of colours for stamping meat and eggshells, the use of food colourings is not allowed.



5. Water and cooking salt

Water must be of drinking standard quality (as per Directive 98/83/EC on the quality of water intended for human consumption) and salt (with NaCl sodium chloride or KCl potassium chloride as basic components).

NB: Water and salt are ingredients of non-agricultural origin and therefore cannot be eligible for organic certification, even though they are by nature of natural origin (for example: spring water, additive-free unrefined sea salt).

6. Nutritional additives

Vitamins, trace elements, amino acids, micronutrients and minerals may be incorporated in foodstuffs only under the following conditions :

- If their use is "legally required" in the meaning of being required by provisions of national law compatible with Union law, with the consequence that the food cannot be placed on the market if the minerals, vitamins amino acids and/or micronutrients concerned are not added.

OR

- If their use is authorised in "infant formulae and follow-on formulae" referred to in R(EU) 609/2013 and Directive 2006/141/EC and in "processed cereal-based foods and baby foods for infants and young children" referred to in Regulation (EU) No 609/2013 and Directive 2006/125/EC.

II. System for calculating the percentage of organic ingredients of food products

For the purpose of calculating the percentage of organic ingredients of food products, only ingredients of agricultural origin are taken into account (i.e. raw materials from plant and/or animal origin.)

It is calculated by dividing the net weight of combined organic agricultural ingredients by the total weight of the finished product (excluding salt and water).

Agricultural ingredients produced in liquid form (for example milk, fruit juice, liquid eggs...) are calculated on the basis of single-strength concentrations of the ingredients. When adding dehydrated or concentrated ingredients, water used to dilute the ingredients as part of the reconstitution process is to be taken into account for calculation.

For the purpose of calculation of the organic percentage, 8 food additives listed in Annex VIII.A and marked with an asterisk are also taken into account:



- ✓ E 160b Annatto, Bixin, Norbixin
- ✓ E 306 Tocopherol-rich extract
- ✓ E 322 Organic Lecithin
- ✓ E 392 Extracts of organic rosemary
- ✓ E 410 Locust bean gum
- ✓ E 412 Guar gum
- ✓ E 414 Arabic gum
- ✓ E 440i Non amidated Pectin

For the moment, the additives listed above are not legally required to be of organic origin (except E 322 lecithin from 1st January 2019 and E 392 Extracts of rosemary) in order to be incorporated to the ingredients list, however they will cause the percentage to be calculated down if they are not.

Yeast and yeast products shall also be calculated as ingredients of agricultural origin for the purpose of the calculation of the organic percentage of the finished product (under current regulation, non-organic yeasts are considered as approved micro-organism preparations).

III. Products eligible for Organic Certification

Once the specific requirements of all the stages described previously have been met, the product is definitely ready for certification. Product group and therefore labelling will be defined depending on the organic or non-organic origin of the agricultural raw materials and the calculation of the percentage of organically produced ingredients.

A. Food products containing at least 95% organic ingredients of agricultural origin

This group encompasses most of the processed food products certified as "organic". Most organic products are included in this group.

At least 95% of the agricultural ingredients are organic.

The remaining 5% of non-organic agricultural ingredients must consist of raw materials listed in Annex IX of EOS, unless a specific dispensation has been granted by Ecocert SA (specific authorisation demand form available upon request to Ecocert).



B. Food products containing a variable percentage of organically produced ingredients

This group includes products containing less than 95% of agricultural ingredients are organic: they do not have to comply with rules laid down by Annex IX on non-organic ingredients or benefit from an authorisation.

This group also includes products containing at least 95% organic but their remaining 5% of non-organic ingredients are not listed in Annex IX and have not been granted a dispensation.

C. Products containing predominantly ingredients from fishing and hunting of wild animals

Products originating from fishing and hunting of wild animals are definitely considered as agricultural ingredients even though products may never be eligible for organic certification.

As an incentive for operators, who try and use organic secondary ingredients when processing products containing this type of ingredients, a specific product group has been allocated to them, providing they meet both following requirements:

- ✓ fishing and hunting products are the main ingredients
- ✓ all the other agricultural ingredients are certified as organic

D. Products in-conversion to organic farming

Processed foodstuffs that are mainly composed of "in conversion" raw material of plant origin (harvested at least 12 months after the beginning of the conversion period) may only be eligible for certification and labelled as "product under conversion to organic farming" provided the designated raw material is the only agricultural ingredient. However, authorised non-agricultural ingredients (additives, processing aids listed in Annexes VIII, flavourings...) may also be used.

For example, "in-conversion to organic" **pure** apple juice MAY BE CERTIFIED

A product containing 2 in-conversion ingredients may NOT be eligible for certification. For example, in-conversion pure apple juice and in-conversion pure pear juice may be eligible for certification separately, but in-conversion apple & pear juice may not be eligible for certification when combined.



Animals and products of animal origin may not be eligible for “in-conversion to organic” certification.

IV. Definitions

Conversion

Means the transition from non-organic to organic farming within a given period of time, during which the provisions concerning the organic production have been applied. Products of plant origin cropped at least 12 months after starting conversion is considered as “in-conversion to organic farming”.

Food additive (as per Reg. (EC) 1333/2008)

Any substance not normally consumed as a food in itself and not normally used as a characteristic ingredient of food, whether or not it has nutritive value, the intentional addition of which to food for a technological purpose in the manufacture, processing, preparation, treatment, packaging, transport or storage of such food results, or may be reasonably expected to result, in it or its by-products becoming directly or indirectly a component of such foods.

Processing Aid (as per Reg. (EC) 1333/2008)

Means any substance which is not consumed as a food ingredient by itself, is intentionally used in the processing of raw materials, foods or their ingredients, to fulfil a certain technological purpose during treatment or processing and which may result in the unintentional but technically unavoidable presence of residues of the substance or its derivatives in the final product, provided that these residues do not present any health risk and do not have any technological effect on the final product

Food Enzyme (as per Reg. (EC) 1332/2008)

A food enzyme is a product obtained from plants, animals or micro-organisms or products thereof including a product obtained by a fermentation process using micro-organisms containing one or more enzymes capable of catalyzing a specific biochemical reaction and which is added to food for a technical purpose at any stage of the manufacturing, processing, preparation, treatment, packaging, transport or storage of foods.

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Ingredient (as per R(EC) 1169/2011)

Means any substance or product, including flavourings, food additives and food enzymes, and any constituent of a compound ingredient, used in the manufacture or preparation of a food and still present in the finished product, even if in an altered form; residues shall not be considered as 'ingredients'.

Within a given food products, if a primary ingredient consist in a combination of several secondary ingredients, the latter have to be listed on the ingredients list of the designated food product.

However, food additives and enzymes incidentally present in a food product due to the fact that they were present in one or several ingredients of the food, are not considered as ingredients, providing they do not have any technological effect on the finished product.

V. References and EOS

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|------------------------|---|
| I.2 | – Scope |
| II.4, III.1&2, V (C) | – General rules on the production of processed food |
| VII.(A) to (D) | – Use of references to organic production |
| V (C).2 + Annexes VIII | – Approved non-agricultural ingredients |
| V (C).3 + Annex IX | – Approved non-organic agricultural ingredients |
| VII (F) | – In-conversion products |

Documents available upon request to ECOCERT or to be downloaded from our website www.ecocert.com

