



Organic Salt – EUsalt asks for the withdrawal of the delegated regulation regarding production rules for organic sea salt and other salts for food and feed

EUsalt is the European association representing the European salt industry including sea salt, vacuum salt and rock salt.

EUsalt opposes and asks MEPs to veto the proposed <u>delegated regulation</u> amending Regulation (EU) 2018/848 regarding detailed production rules for organic sea salt and other organic salts for food and feed, hereafter delegated regulation, or that the European Commission withdraws it. Consequentially, EUsalt also requests that salt is removed from Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007, hereafter Organic Regulation.

Despite wide opposition in the Public Consultation and opposition from coordinators of several parties represented at the European Parliament, the European Commission adopted the delegated regulation with the content prepared at the end of last year i.e., before the public consultation. **EUsalt considers this to be against the will of the majority of stakeholders participating in the consultation and against the voice of the majority of European salt producers, including sea salt producers.**

- The Organic Regulation stipulates that "sea salt and other types (not type sic!) of salt used in food or feed" would be included in the scope of this regulation. However, the text submitted for a consultation does not meet this objective considering the new proposed rules prohibit the transformation of a large majority of all types of production.
- Salt is a mineral, essentially inert, which has no place in organic farming since the latter is centred on the science of living organisms. The inclusion of salt in the Organic Regulation is thus a contradiction. It does not respond to a request from salt professionals or organic farming bodies, nor to that of consumers who already have adequate quality and origin labels to choose the salt, they wish to consume (for example choosing a product with Protected Geographical Indication PGI).
- The delegated regulation contradicts the objectives of the EU Farm to Fork Strategy and the EU's goal of at least 25 % organic production by 2030 as it de facto prohibitively excludes the large majority of the salt industry from organic production and limits the potential of organic salt to a small amount of production capacity. The F2F Strategy aims to transform the food sector. The new proposed rules prohibit the transformation of a large majority of all types of production even with the best intention and highest investments. We estimate that more than 90% of Europe's salt production would be excluded from being labelled as organic. In case these rules apply, they would risk extending the distance for the supply of organic salt in certain parts of Europe, which would be contrary to the objective of organic production to promote short



distribution circuits and local production, such deliveries would also produce additional emissions contrary to organic production and F2F Strategy.

- For four years, difficult discussions between experts and the administrations of the Member States have not allowed a consensus to be reached on the definition of production rules for organic salts. This deadlock is explained by the fact that salt is produced in several ways from the sea, from underground deposits by mining methods or from underground deposits by dissolution and recrystallisation which are due to geological occurrences unevenly distributed throughout Europe and each of which is of interest in terms of quality, both for human and animal consumption. The current delegated regulation introduces discrimination between certain (and excludes the large majority of) production methods, and even between certain Member States, which have no salt or all salt production methods in place.
- These concerns have been raised by a wide array of stakeholders from all across the EU during the <u>public consultation</u>. Salt manufacturers, businesses involved in organic production, citizens and other concerned parties expressed concerns or opposition to the delegated regulation. Hence EUsalt believes that the delegated regulation does not serve the intended purpose and undermines the overall coherence of the current legislative framework.

For the above stated reasons and to avoid confusing the European customers, introducing discrimination between the salt production and processing methods and finally excluding more than 90 percent of salt producers from organic production, EUsalt requests that salt is removed from the relevant legislation and asks MEPs to veto the delegated regulation or the European Commission to withdraw it.