

18 June 2024

EUsalt input on 2024/0153/FR (France) - Specifications on organic livestock production supplementing the provisions of Regulation (EU) 2018/848 and its secondary acts, in particular laying down production rules for organic salt

EUsalt is the European association representing the majority (more than 80 per cent) of the European salt industry including sea salt, vacuum salt and rock salt (EU Transparency Register 03451096957-77).

EUsalt wishes to reiterate its strong opposition to the draft law from France notified under 2024/0153/FR (France). The law is almost entirely the same as the delegated act on 'organic salt' which was rejected by the European Parliament as well as the majority of stakeholders in the public consultation preceding the process.

- EUsalt recalls that the European Parliament rejected the delegated act regarding production of salt in 2023 (468 members of the European Parliament voted to veto the Act). Several stakeholders including the organic production associations consider salt does not belong to the category of organic products. There is no difference between the salt products, it will only cause confusion, bring extra cost and make the product less available for other Member States.
- This situation will mean that 'Organic' salt will only be available in a very small number of Member States, which will increase costs for the consumer as the organic label salt will have to be transported from only a small number of Member States to the others.
- The proposed law is almost entirely similar to the Delegated Act regarding Organic Salt production which was rejected by the European Parliament in July 2023. Therefore, the Delegated Act did not come into force. It is rather controversial that the rules rejected by the European legislator as well as the society in the public consultation preceding the procedure are now being proposed by one country in the Union. These products with an organic label may be exported to a country while that country recalls rejecting such rules. This complicates the situation in the single market of the EU and disrupts the situation where the market should be equal to all.
- Such rules will confuse consumers as products in France may be using an organic label while in other countries, without such rules, the label may not be on the market. The consumers will not understand the differences between the salt and it will create a wrong image for them if they try to compare products which they think are organic and others which do not have such a label.
- Other Member States may be preparing their own rules which could be different from the rules in France, hence different procedures, rules and labels will be applied in each Member State. The market will be disrupted and consumers very confused. One country may be able to produce 'organic' salt and others not, potentially leading to a situation where one country has an advantage over another MS.

EUsalt arguments previously submitted to the Delegated Act process:

- 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 draft 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 aim of the F2F Strategy is 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. EUsalt estimates 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 draft 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.

- Finally, EUsalt reviewed the feedback submitted to the consultation and noted that a wide array of stakeholders from salt manufacturers, businesses involved in organic production, citizens and other concerned parties expressed concerns or opposition to the draft delegated act. Hence EUsalt believes that adoption of the current draft would not serve the intended purpose and would undermine the overall coherence of the current legislative framework.
- For the above stated reasons and to avoid putting different production methods, which make up the richness of European salt production and salt heritage, against each other, EUsalt requests that salt is removed from the relevant legislation.

EUsalt would also appreciate 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.