



Mrs. Nathalie Sauze-Vandevyver
Director
DG Agriculture
European Commission
130, rue de la Loi
B-1049 Bruxelles

Brussels, 27 February 2019

Re: Draft delegated act on organic salt

Dear Mrs. Sauze-Vandevyver,

I am writing to you on behalf of [Artisanal Sea Salt Europe](#) to share our serious concerns with regard to the draft delegated act on organic salt.

As our members would clearly benefit from detailed production rules on organic salt, we have been following the work carried out by the European Commission on this topic very closely. We shared with the European Commission information on different salt production techniques, we had a meeting to expose our point of view and submitted comments to the first draft delegated act tabled by DG Agriculture.

We have now analysed the second draft delegated act published by the European Commission which raises even more concerns than the first one when it comes to salt (see our detailed comments attached).

European traditional sea salt producers cannot accept nor subscribe to the proposed text, as it would allow practically all types of salt production to be considered as organic, thus ignoring the principles and main objectives of the EU organic regulation.

Recital 1 of Council Regulation (EU) 2018/848 of the European Parliament of 30 May 2018 on organic production and labelling of products biological systems provides that: « *Organic production is an overall system of farm management and food production that combines best environmental practices, a high level of biodiversity, the preservation of natural resources, the application of high animal welfare standards and a production method in line with the preference of certain consumers for products produced using natural substances and processes. The organic production method thus plays a dual societal role, where it on the one hand provides for a specific market responding to a consumer demand for organic products, and on the other hand delivers public goods contributing to the protection of the environment and animal welfare, as well as to rural development.* »

Recital 10 states: « *Experience gained so far with the application of Regulation (EC) No 834/2007 shows the need to make clear to which products this Regulation applies. ... Finally, sea salt and other salts used for food and feed should be included in the scope of this Regulation because they may be produced by applying natural production techniques, and because their production contributes to the development of rural areas, and thus falls within the objectives of this Regulation* ».

It is therefore staggering to note that in its last draft delegated act, the European Commission proposes to authorise among other things:

- (a) rock salt mining by mechanical breaking and grinding;

- (b) *rock salt mining with low emission explosives or solution mining;*
- (c) *use of water or non-saturated brine to dissolve rock salt (solution mining);*

Organic production is about sustainable production, protecting the environment and natural resources. In the case of salt mining, the use of the resource is final; a new mine must be found when the previous one is exhausted. The means used such as long chain-saws, skips and explosives are identical to those used for the extraction of other ores such as coal. In addition, the purity of the mineral deposit may be insufficient, and it is therefore often necessary to wash the rock salt to remove impurities, which requires the use of large amounts of fresh water, strong and dangerous pollutant sewage production. The solution mining technique consumes a lot of energy and fresh water. In a nutshell, these techniques have a huge ecological footprint.

In Europe, only the solar method of salt production is close to agriculture, with a cycle of weather-dependent production and a seasonally-adjusted salt marsh schedule. Resource renovation results from the nature sea water cycle. In France, the solar method is also called "agricultural". The solar technique based on the natural evaporation of seawater, is therefore in line with the requirements of organic farming.

What is at stake here is the credibility of the whole EU organic production policy. Accepting such provisions would set a dangerous precedent for the European organic regulation, opening space for the acceptance of industrial production for several other organic products. Moreover, it could raise potential health issues as it has been known that salt mining and solution mining production in some third countries have brought health hazards.

We strongly encourage the European Commission to adopt a delegated act on organic salt rules that is fully compliant with the objectives of the EU organic production policy. Should that not be the case, European traditional sea salt producers will not make use of this new certification and will not shy from underlying its shortcomings.

Our European Federation remains fully committed to working with the European Commission services on this very important issue for our sector and remains at your disposal to discuss this further.



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