## **Organic Salt**

The European Commission ready to undermine the EU organic policy and its Green Deal ambitions



# The European Commission is working on drawing up specifications for an organic agriculture label for salt. What is at stake?

The European Commission's Directorate-General for Agriculture published on 6 August 2021 a <u>document</u> that will serve as a basis for drawing up the specifications for organic salt.

DG Agriculture had given a clear mandate to a group of salt experts:

"The salt sub-group shall describe each production process separately and evaluate its compatibility with the objectives and principles of organic production mentioned in Chapter II of Regulation 2018/848".

Yet, the report published by the European Commission on 9 August 2021 fails to assess the compatibility of the different salt production methods with the objectives and principles of the EU organic regulation.

The content of this report is extremely worrying as the European Commission is preparing to make virtually all existing salt production methods eligible for the organic label, including the least environmentally friendly ones, such as mine salt and vacuum salt.

This proposal would clearly go against the objectives and principles of EU Regulation 848/2018 on organic production. It would undermine the credibility of the EU organic farming policy and go against the objectives set out by the EC in its ambitious <u>European Green Deal</u> for a more sustainable use of resources.

Tens of millions of tons of salt in Europe could be labelled as organic, whereas today most of the few thousand tons of salt sold in organic shops comes from traditional sea saltworks.



## Which types of salt can be considered as organic?

In the past, several stakeholders expressed reservations about opening the EU organic farming label to a product such as salt as it is neither an animal nor a plant-based product. They feared that the organic label would lose its value if salt would not meet the provisions set out in the <u>EU</u> regulation 848/2018 on organic production.

The EU regulation on organic farming makes it clear that the following elements should be taken into account when deciding whether a product can be considered as organic in the EU: a distinction between natural and non-natural production techniques, a contribution to the development of rural areas, the respect for natural cycles, a contribution to environmental and climate protection, the responsible use of energy and natural resources, etc.

It is perfectly possible to produce salt in accordance with the objectives and principles of EU Regulation 848/2018 on organic production.

However, as explained below, most of the salts produced do not meet these conditions.

### ROCK (OR MINE) SALT

Rock salt is a product of mining. It is a production method that is not based on an agricultural logic but on a mining logic: exploitation of a vein until it has dried up, then abandonment of the site and creation of a new exploitation around a new deposit, with extraction every single day of the year. It often requires evaporation after the extraction through underground mining techniques with cutting, drilling and blasting techniques involving the use of explosives or solution mining which includes drilling a borehole, injection of water into the deposit cavern and pumping out the saturated brine dissolution of the underground salt deposits. These non-natural techniques have a significant impact on the environment and natural resources. Abandoned mines are dangerous places and destroy environmental landscapes. > Rock salt cannot be considered as organic.

### VACUUM SALT

Vacuum salt is obtained by evaporating chemically purified, saturated brine in closed vessels. Before the brine is evaporated, it is generally softened and subject to a purification process by chemical or mechanical means to remove undesired minerals such as calcium, magnesium, sulphates and carbonates. The treatments of the brine require the use of processing aids such as precipitation agents (e.g., caustic Soda, soda ash, flue gas...) and flocculants to accelerate the sedimentation process. Further, in order to prevent the boiling brine from foaming, anti-foaming agents can be injected into the evaporator vessels. It relies on non-natural techniques which require a lot of non-renewable energy. It is responsible for placing salt production in the "carbon leakage" risk category in the EU ETS (Emission Trading Systems). Salt produced through this technique is miles away from being a natural product. > Vacuum salt cannot be considered as organic.

## SALT FROM THE EXTRACTION OF NATURAL BRINE

Natural brine deposits in underground caverns can be exploited by pumping the brine to the surface. This drilling and pumping technique followed by evaporation is not a natural production technique. Sweet water usage is huge and high pollution sewage a major issue. > Salt extracted from natural brine cannot be considered as organic.

## SALT FROM OPEN PAN EVAPORATION TECHNIQUES

This salt is produced by evaporating the brine into salt crystals by heating it in open pans. This technique requires the use of a lot of nonrenewable energy.

> This type of salts cannot be considered as organic.

### SOLAR SALT

The concentration and crystallisation of salty waters can be obtained by solar evaporation taking place in open-air ponds through the action of sun and wind. Solar evaporation is a naturally occurring process that is dependent on a seasonal cycle. > It can thus be considered a natural production technique. However, not all solar salt production processes should be considered as organic. Some industrial solar sea salt production processes use mechanization systems that generate the need for a fairly significant leaching treatment after its crystallisation. This type of salt cannot be considered "organic", as it has not retained its natural characteristics in terms of magnesium, calcium, potassium and trace elements (due to the leaching it undergoes).

Only salts obtained by solar evaporation that have retained their natural characteristics and have not been subject to input or leaching treatment should be considered as organic.



This is the case of hand-harvested salt.

This is the gentlest method of harvesting and production, the most environmentally friendly and the most respectful of the natural product. Harvested in the same way in some marshes for more than 1000 years using gentle techniques, this is proof of the sustainability of this type of harvest.

Production process is fully tuned with the natural water cycle, using only energy and salty water from natural sources, returning it to the environment and not producing any waste products.

After harvesting, which is carried out without any inputs, **the minimal post-production process** (drying - grinding to produce fine salt) does not alter the chemical characteristics of the salt. These are the only salts that today have organic equivalent certification labels (such as <u>Nature&Progrès</u> or <u>Certiplanet</u>) which are a guarantee of respect for the environment.

## What is the European Commission's approach to organic salt?

In February 2019, the European Commission tabled a <u>draft delegated act</u> on production rules for organic salt. The European producers of traditional sea salt – and several Member States - expressed serious reservations as the proposed text would have allowed practically all types of salt production to be considered as organic.

The European Commission withdrew its proposal and asked organic experts of the EGTOP group to look into the issue. As this group did not have expertise with regard to the salt sector, a sub-group of 4 salt experts was set up by an international tender. One of these experts produced a <u>report</u> on his own calling for all the salts to be eligible to organic labelling while the other three experts agreed in a <u>joint report</u> that only the salts that met the principles and objectives of the EU organic regulation should be considered.

The European Commission drafted a synthesis of the salt experts' work and asked the EGTOP group to endorse a document that backs the proposal it made in 2019, overruling the sub-group joint report's recommendations. The intention is to make virtually all existing salt production methods eligible for the organic label, including the least environmentally friendly ones. Such an approach is puzzling as it would clearly not be in line with the ambitious EC European Green Deal agenda.

The European Commission "Final report on organic sea salt and other salts for food and feed" would allow all types of salt to benefit from the organic label posing:

- a risk of loss of confidence in the European organic label
- a risk of confusion in the minds of consumers
- a risk of destabilising the salt market, with small-scale salt producers being the first victims



## What are the risks associated to the European Commission's approach on organic salt?

Consumers expect organic salt to be produced in accordance with processes that have a limited environmental impact (responsible use of energy and natural resources, maintenance of biodiversity, preservation of regional ecological balances), using natural substances.

The EC's proposal on organic salt that would make no difference between the salt production techniques would open a serious **breach in the credibility of the European organic label**.

The production of mine salt, for example, exploits resources that are by definition not renewable using destructive techniques. Artificial crystallisation techniques by heating are the most energyintensive, with a record carbon emission highlighted in many reports. Artificial salt purification processes and the use of chemical inputs totally contradict the natural production requirements of organic farming. And yet, all these methods are allowed in the document that the European Commission has published.

It is striking that the report published by the European Commission does not take into account the fact that producing solar salt, even on plastic sheeting like it is done in some African countries, is much more virtuous than extracting mine salt by deep drilling, dissolving and recrystallising by heating, for example. It is puzzling that the worst technique from the point of view of energy consumption, that of vacuum recrystallisation of brine would be authorised. Under the EC's plan, salt production techniques that are environmentally friendly would be subject to additional requirements whereas existing non sustainable techniques (mining, vacuum) would be allowed with the exception of the most aggressive techniques, such as explosives for mining.

The **issue of additives** is also problematic. Organic salt can be free of any food additives because they are not necessary for its production. However, the EC's approach would authorise the use of processing aids in organic salt production such as such as precipitation agents (e.g., caustic soda, soda ash, flue gas...), flocculants to accelerate the sedimentation process and anti-foaming agents to prevent the development of foam when boiling the brine. It would also allow anticaking agents E535, E551b and E 170 and E 504 which are not authorized for use in food product under Regulation (EC) No 889/2008. Authorising these substances in products bearing the EU organic logo would be a major concession to the current practices of the big salt industries but is in no way essential.

**Pollution generation** should also be a major point of concern. Salt treatment and processing factories are among the list of industrial units that are producing the most dangerous waste. Allowing salt production processes that require such units at the expense of other environmental oriented salt production techniques, would be a total non-sense in view of the EU organic regulation's objectives.

Many operators of the organic sector in the EU and beyond are likely to be upset about such a lax approach to the definition of organic production.

Accepting such provisions would certainly create **confusion and mistrust among consumers**. The EU organic logo is compulsory for most organic products so rock and vacuum salt would bear the same logo as an organic honey. This would undermine consumers' confidence on the EU organic labelling scheme.

### Compliance with Regulation 848/2018

Article 4 – Objectives	
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	Rock salt	Vacuum salt + Open pan salt (artificial evaporated)	Sea salt Spring salt Salty lake salt
a/Contributing to protection of the environment and the climate	×	×	Č
b/Maintaining the long-term fertility of soils	×	×	1 C
c/ Contributing to a high level of biodiversity	×	×	1
d/ Substantially contributing to a non-toxic environment	×	×	, Či
e/ Contributing to high animal welfare standards and, in particular, to meeting the species-specific behavioural needs of animals	×	×	Ċ
f/ Encouraging short distribution channels and local production in the various areas of the Union	×	×	Ľ.
g/ Encouraging the preservation of rare and native breeds in danger of extinction	×	×	Ľ.
h/ Contributing to the development of the supply of plant genetic material adapted to the specific needs and objectives of organic agriculture	N/A	N/A	N/A
i/ Contributing to a high level of biodiversity, in particular by using diverse plant genetic material, such as organic heterogeneous material and organic varieties suitable for organic production	N/A	N/A	N/A
j/ Fostering the development of organic plant breeding activities in order to contribute to favourable economic perspectives of the organic sector	×	×	č

## Regulation 848/2018 Article 5 – General principles

	Rock salt	Vacuum salt + Open pan salt (artificial evaporated)	Sea salt Spring salt Salty lake salt
a/ Respect for nature's systems and cycles and the sustainment and enhancement of the state of the soil, the water and the air, of the health of plants and animals, and of the balance between them	×	×	Ň
b/ The preservation of natural landscape elements, such as natural heritage sites	×	×	, Č
c/ The responsible use of energy and natural resources, such as water, soil, organic matter and air	×	×	
d/ The production of a wide variety of high-quality food and other agricultural and aquaculture products that respond to consumers' demand for goods that are produced by the use of processes that do not harm the environment, human health, plant health or animal health and welfare	×	×	Č
e/ Ensuring the integrity of organic production at all stages of the production, preparation and distribution of food and feed	×	×	
f/ The appropriate design and management of biological processes, based on ecological systems and using natural resources which are internal to the management system	×	×	Č
g/The restriction of the use of external inputs	, Či	×	, Ži
h/ The adaptation of the production process, where necessary and within the framework of this Regulation, to take account of the sanitary status, regional differences in the ecological balance, climatic and local conditions, stages of development and specific husbandry practices	N/A	×	ů
i/ The exclusion from the whole organic food chain of animal cloning, of rearing artificially induced polyploid animals and of ionising radiation	N/A	N/A	N/A
j/ The observance of a high level of animal welfare respecting species-specific needs	×	×	

## What would be the impact on traditional sea salt producers?

It would be destructive.

The production of hand-harvested sea salt (coarse salt and fleur de sel) currently provides a living for thousands of small producers in Croatia, France, Greece, Italy, Slovenia, Spain and Portugal. Whether they are grouped within cooperatives or independent, these women and men are rooted in their territories and practice an activity that cannot be relocated. The size of their farms is generally small, below 10 ha. For these producers, the production of fleur de sel can represent up to half of their turnover.

Several of these traditional sea salts have secured a protection as protected denomination of origin (PDO) or protected geographical indication (PGI) at the EU level:

Sel de Guérande / Fleur de sel de Guérande since 2012 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011XC0629(10)&from=EN

Sale Marino di Trapani in 2012 https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32012R1175

Sal de Tavira / Flor de Sal de Tavira in 2013 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52013XC0509(04)&from=EN

**Piranska sol in 2014** https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52013XC1203(06)&from=EN

## Paška sol in 2019 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018D1213(02)&from=EN



Buying flower of salt and coarse salt from the salt marshes of these small producers means supporting their commitment to quality, transparency towards consumers and the maintenance of a sustainable activity that is essential to the life of these extraordinary areas, the salt marshes.

In today's market, industrial salts have a clear dominant position. Hand-harvested salts are not sufficient to cover all the salt demand, which is very high. It is therefore necessary for the overall economy of the EU that large industrial salt groups prosper. Nevertheless, the artisanal sea salt sector has found its market, thanks to the specificity of its product and its production method. It contributes to the economic vitality of the regions in which it is located, participating, among other things, in their tourist influence, and plays an important role in the protection of the environment and biodiversity. It is important that decisions taken at European level do not weaken this sector.

Recognition of the specificities of hand-harvested sea salt by an EU organic label would strengthen this sector, without disrupting the development of the major industrialists, who still have access to the entire non-food market, and who, on the food salt market, would still have access to agroindustrial clients as well as to consumers who are not sensitive to the ecological dimension of their food.

On the other hand, providing access to the EU organic label to all salts would **upset the current balance and make the market even more inequitable**. It would wrongly give the impression that the products and their production methods are similar, thus allowing the giants to crush the traditional sector, in what would then be a dominant position, with the industrialists being able to flood the market with salt at prices that would be unaffordable for small producers. The current lack of definition of the Flower of salt at the EU level which allows any type of product to be called "Flower of salt" is already a major challenge to the survival of artisanal sea salt producers. An organic regulation which, by the same token, would erase the differences between all salts would mean the short-term death of the traditional sea salt sector, without providing any macro-economic added value for the EU.



## What are the expectations of Artisanal Sea Salt Europe?

We believe it is essential that only salt that has retained its natural characteristics without any inputs in its composition can be considered organic.

Only the solar salt production method has the characteristics of agricultural production, with a production cycle dependent on weather conditions and a calendar adapted to the seasons. The solar technique, based on the natural evaporation of sea water and the preservation of resources, is therefore fully in line with the requirements of organic farming.

Discussions on the final drafting of the specifications for the organic label for salt will take place this autumn.

We are counting on the support of all interested parties - Member States, Members of the European Parliament, elected representatives at the local, regional and national level, local players, consumers and the media - to defend the adoption of a delegated act on organic salt that is fully in line with the objectives of the European Union's organic production policy.

## Annex

## How does a salt marsh work?

The principle of salt marshes is simple and ingenious: the sea water is channelled through a slight difference in level into successive basins until it reaches the crystallizers. In this way, the slow circulation managed by the salt producer, promotes evaporation and thus the concentration of the salt water.

Under the combined effect of the sun, wind and the salt producer's know-how, this water circuit, sometimes several kilometres long, results in the formation of coarse grains of salt and "fleur de sel" in the crystallizers.

The whole art of salt production consists in the fine management of the water flow in relation to the weather in order to favour the crystallisation process. During its course, the concentration of salt in the water is multiplied by ten! It goes from 30 grams of salt per liter to 300 grams of salt per liter where the coarse salt and the fleur de sel are harvested.

The production is very weather-dependent: a single storm can put an end to the harvest! The harvest is therefore concentrated in Spring and Summer when the weather is most clement.



## Salt marshes - Heirs and guardians of a remarkable ecosystem

Halfway between the land and the ocean or sea, salt marshes are authentic landscapes, shaped by centuries of salt exploitation, of which the salt workers are the heirs and guardians... Their natural action throughout the year prevents these wetlands from being closed and afforested and guarantees the sustainability of this rich ecosystem. These marshes are home to hundreds of bird species: avocets, terns, marsh harriers, white stilts, sandpipers, barnacle geese, little egrets, blue throats, etc. There is also a very special flora, adapted to water and salt. The most emblematic species is undoubtedly the glasswort, which can be eaten as a condiment or fresh vegetable.

Because of this natural wealth to be preserved, the marshes are the subject of numerous protection measures under EU and national schemes: Natural Zone of Ecological Interest, European Habitat Directive, Natura 2000 areas, etc.









## Artisanal Sea Salt Europe: the European Federation of hand-harvested sea salt producers

French, Italian, Portuguese and Spanish producers of hand-harvested sea salt created, on 11 July 2007, in Nantes (France), a European federation whose aim is to defend their interests with the European institutions.

The founding members of the federation are:

- The French Association of hand-harvested sea salt producers from the Atlantic
- The Spanish Association of Salinas Marinas Artisanales (AESMAR)
- The Portuguese Association Federação Nacional de Produtores de Sal Marinho Artesanal (FENA.SAL)
- The Consortium for the valorisation of the Sale MARino di Trapani (SMART)

In 2018, hand-harvested sea salt producers from Croatia (Solana Nin) and Slovenia (Soline Pridelava soli d.o.o) joined Artisanal Sea Salt Europe.



## **European Federation of Hand-harvested Sea Salt Producers**

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