Organic Salt

the credibility of the EU organic regulation at stake

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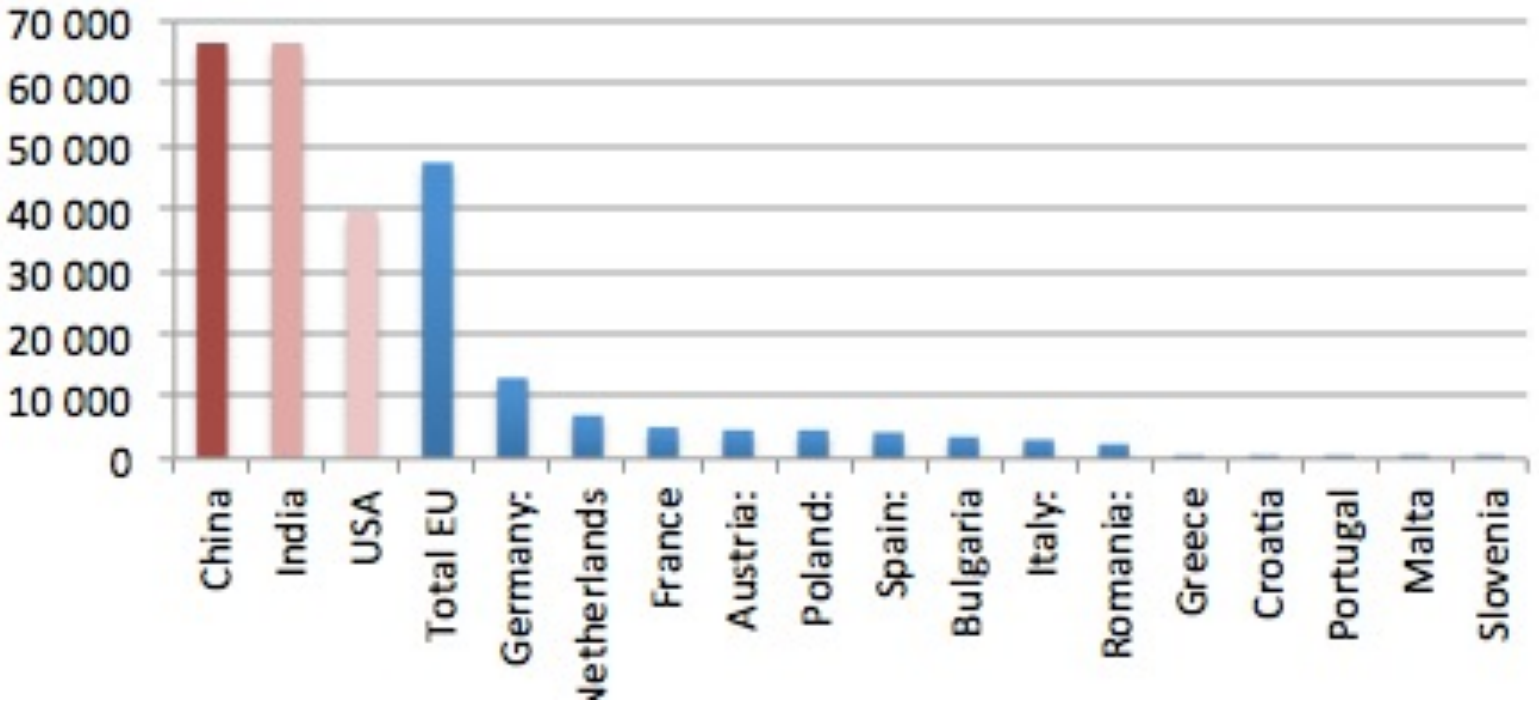
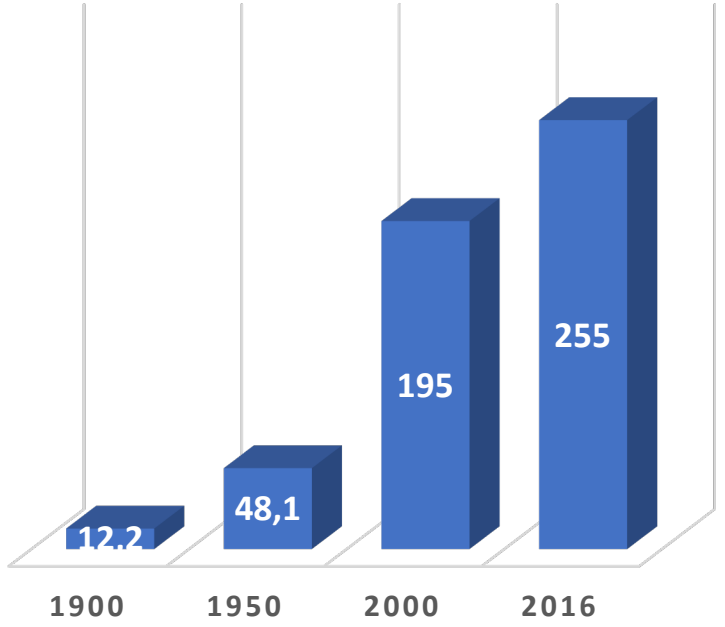
Artisanal Sea Salt Europe

Salt production: world context

2017 Salt production: 3 top players + EU (thousand of tons) (ref: USGS 2020)

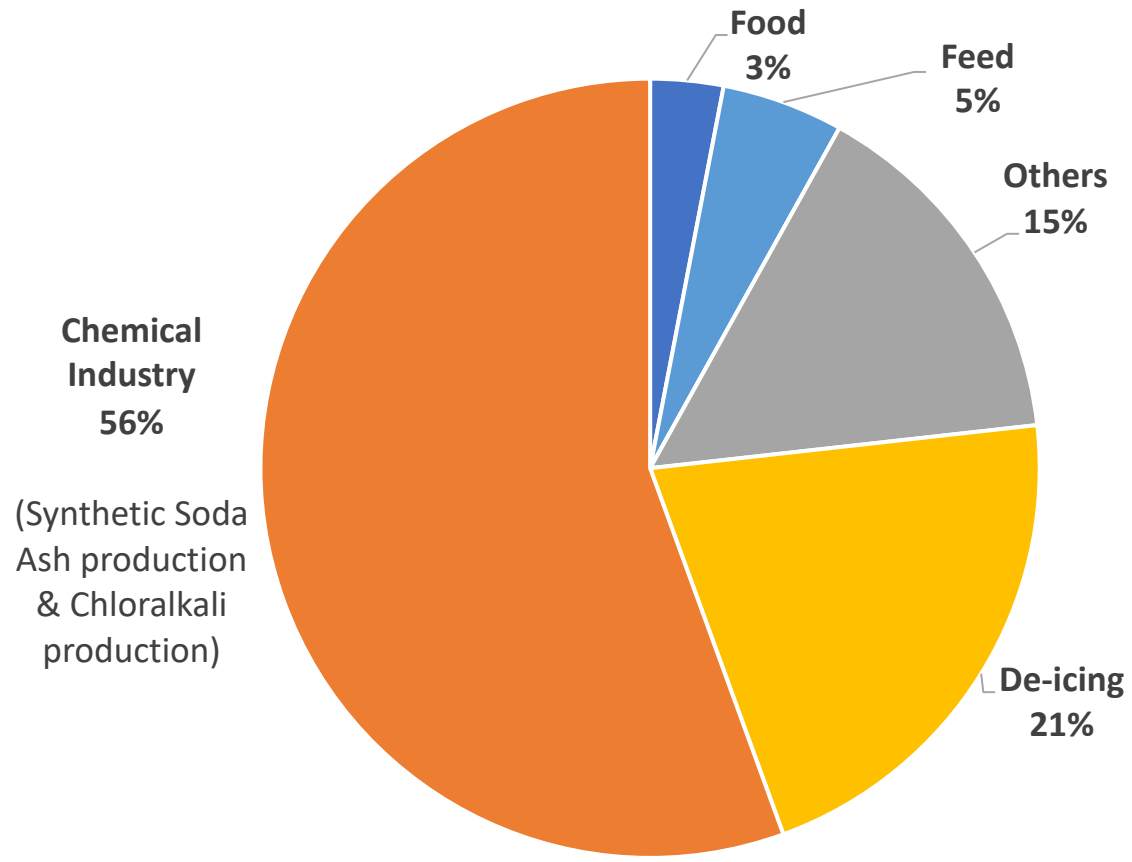


World Salt Production in Million Tons 1900-2016 U.S. Geological Survey



Salt production: EU consumption

Estimation consumption of salt by end use application 2017 (EU28+2)



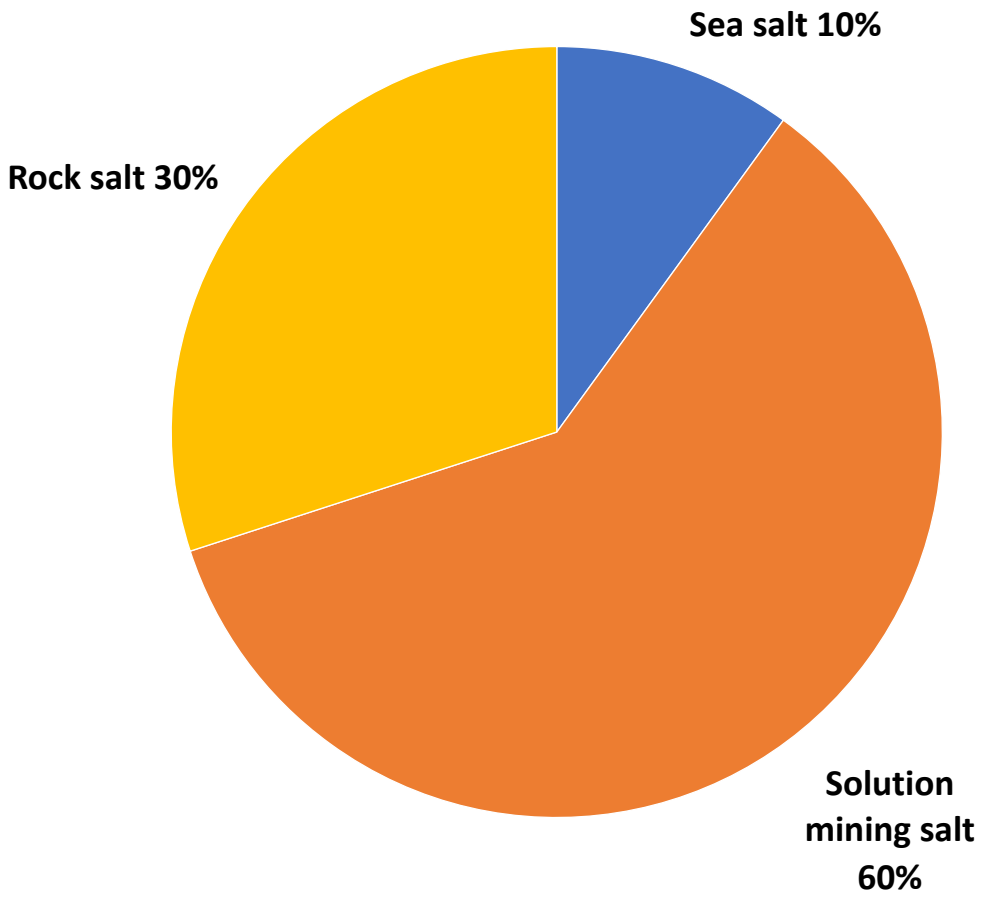
Total EU: 46 millions of tons :

- **8% / 3,7 Millions of tons are needed for food** and **feed consumption,**
- **77% / 27 millions of tons are for chemical industry or De-icing**

EGTOP Salt 2021
Roskill –2017, 2020
Euromines 2016

Salt production: EU production

Share of salt according to production method in the EU



What you need to know about salt production
Very different production techniques

ROCK SALT

- **Production method based on a mining logic not an agricultural logic**

Exploitation of a vein until it has dried up, abandonment of the site and creation of a new exploitation around a new deposit, extraction every single day of the year.

- **Extraction through underground mining techniques**

Cutting, drilling and blasting techniques (explosives) or solution mining
These non-natural techniques have a significant impact on the environment and natural resources.

- **Abandoned salt mines are often used to store dangerous waste.**

Dangerous places, impact on the environmental landscapes and soil pollution.

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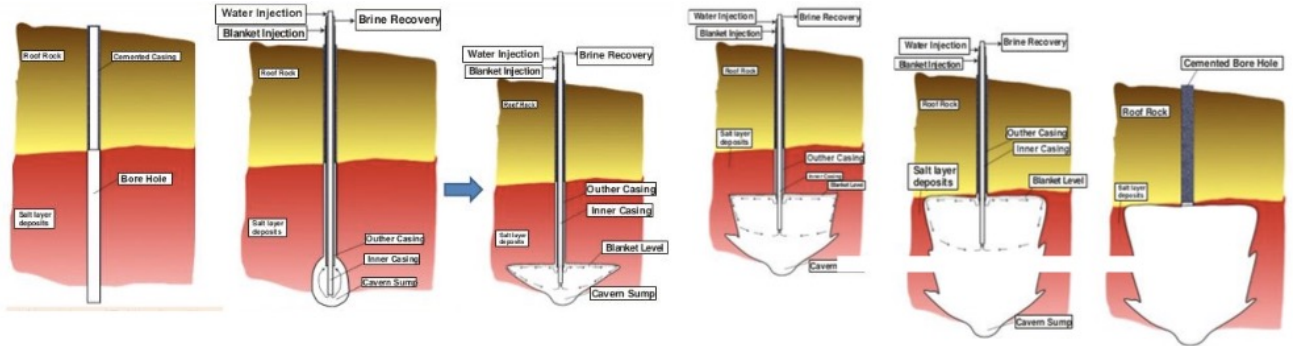
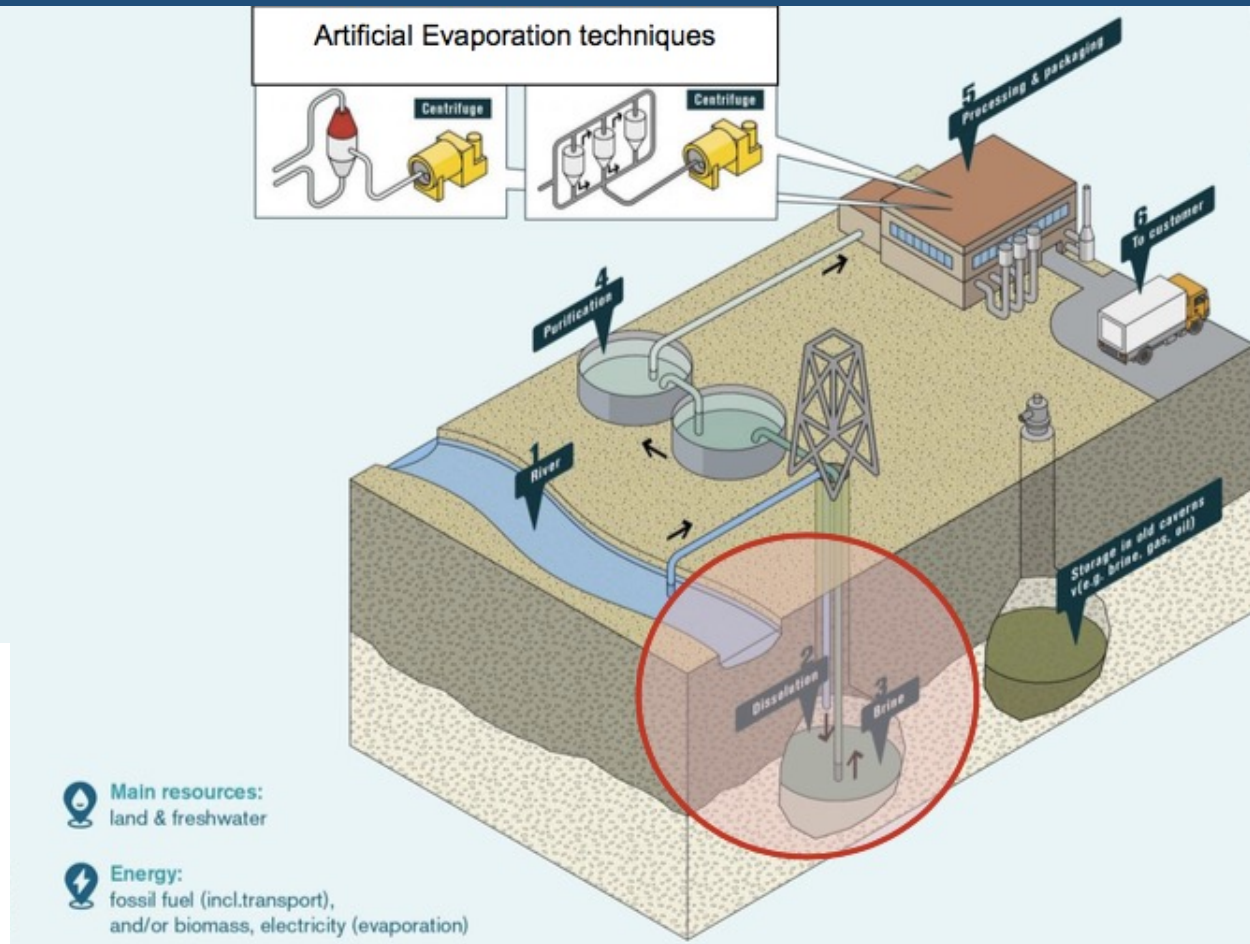
ROCK SALT: DISSOLUTION MINING

- A hole is bored to reach deep salt deposits
- Water is pumped in to dissolve salt, brine is then extracted to be re-crystallized
- Brine is mostly evaporated in vacuum process
- After salt extraction, petrol or gas can be stored in the caverns
- Most of EU salt comes from dissolution mining





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VACUUM SALT

- **Obtained by evaporating chemically purified, saturated brine in closed vessels**

Preliminary processes: **brine softening and purification by chemical or mechanical** means to remove undesired minerals such as calcium, magnesium, sulphates and carbonates

Use of **processing aids 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 boiling brine from foaming

- **Relies on non-natural techniques - require a lot of energy**

Responsible for placing salt production in the **"carbon leakage" risk category in the EU ETS**

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SOLAR SALT

- **Obtained by solar evaporation in open-air ponds through the action of sun and wind.**
- **Naturally occurring process that is dependent on a seasonal cycle**
- **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 treatments).

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HANDHARVESTED SEA SALT

The gentlest method of harvesting and production, the most environmentally friendly and the most respectful of the natural product

- Harvested without any inputs in the same way in some marshes for more than 1000 years, proof of its sustainability
- Production process fully tuned with the natural cycle, using only energy and salty water from natural sources, not producing any waste products
- After harvesting, minimal post-production process (drying - grinding to produce fine salt) – no alteration of the chemical characteristics of the salt
- Today, only salts with organic equivalent certification labels (e.g. Nature&Progrès or Certiplanet)

Hand harvested sea salt

Hand harvested sea salt

Where do we stand on EU rules for organic salt?

- **February 2019, the European Commission tabled a draft delegated act on production rules for organic salt.**
  Several stakeholders and Member States expressed serious reservations as it would have allowed practically all types of salt production to be considered as organic
- **EC withdrew its proposal, asked organic experts of the EGTOP to look into the issue. Sub-group of 4 salt experts was set up.**
  One expert produced his own report calling for all the salts to be eligible to organic labelling. Three other experts agreed in a joint report that only the salts that meet the principles and objectives of the EU organic regulation should be eligible to the organic logo.
- **EC published an EGTOP report in August 2021 that largely ignores the recommendation of the experts' joint report and backs the EC proposal made in 2019.**
  Extremely worrying as would 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
- **EC working on new draft delegated act on production rules for organic salt – expected during the first trimester of 2022.**

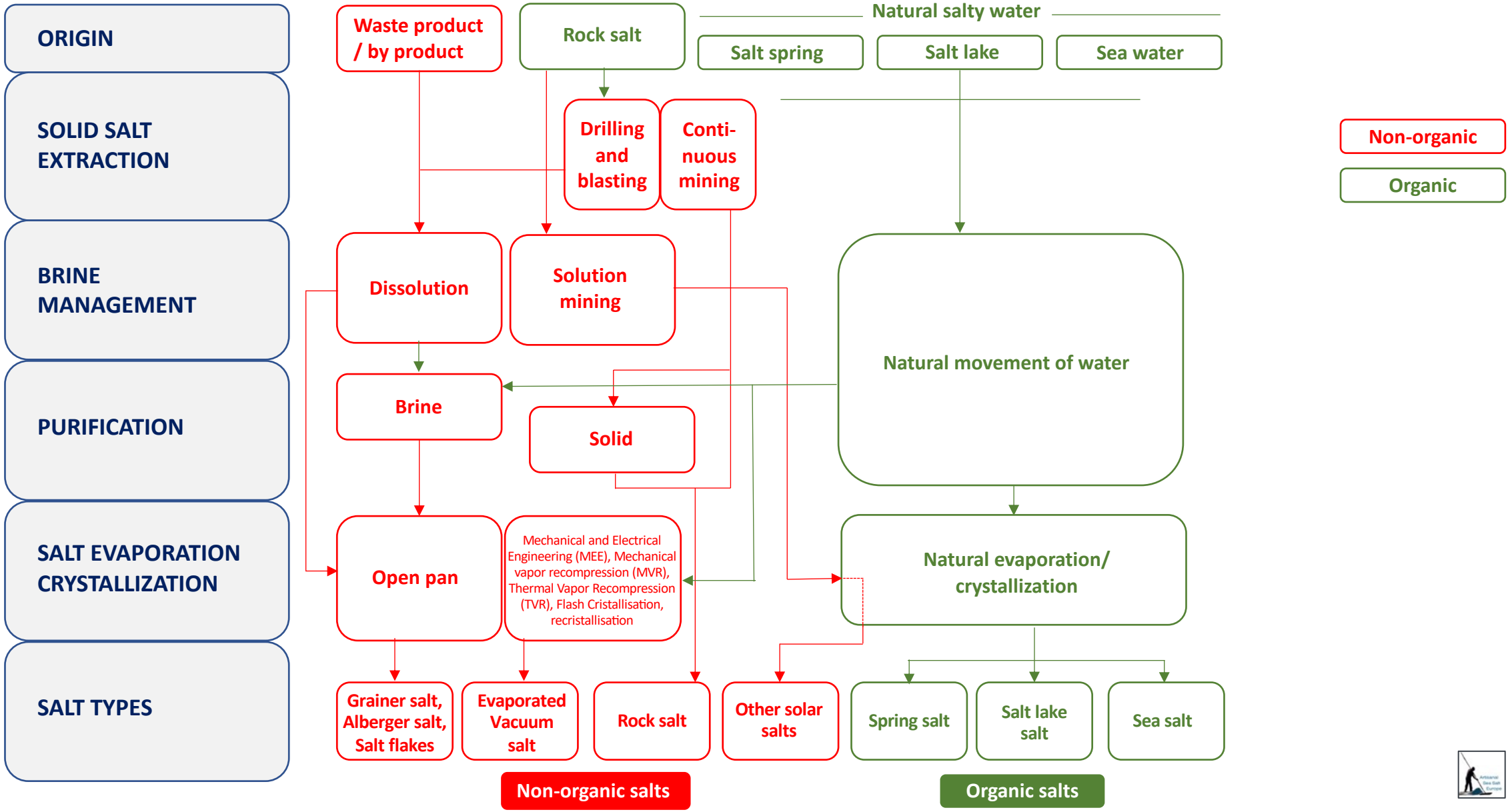
What we are asking for?

EU rules on organic salt should meet the objectives and principles of EU Regulation 848/2018 on organic production, (as asked by EC to EGTOP in 2020) notably:

- Distinction between natural and non-natural production techniques (Whereas 10)
- Contribution to the development of rural areas (Whereas 10)
- Respect for natural cycles (art. 5(a))
- Contribution to environmental and climate protection (art. 4(a))
- Responsible use of energy and natural resources, etc. (art. 5(c))
- Organic salt should not allow the use of any food additives as not necessary for its production.

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

Salt production: flow chart



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Compliance with Regulation 848/2018
Article 4 – Objectives

	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	✗	✗	👍
b/ Maintaining the long-term fertility of soils	✗	✗	👍
c/ Contributing to a high level of biodiversity	✗	✗	👍
d/ Substantially contributing to a non-toxic environment	✗	✗	👍
e/ Contributing to high animal welfare standards and, in particular, to meeting the species-specific behavioural needs of animals	✗	✗	👍
f/ Encouraging short distribution channels and local production in the various areas of the Union	✗	✗	👍
g/ Encouraging the preservation of rare and native breeds in danger of extinction	✗	✗	👍
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	✗	✗	👍

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	✗	✗	👍
b/ The preservation of natural landscape elements, such as natural heritage sites	✗	✗	👍
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	✗	✗	👍
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	✗	✗	👍
g/ The restriction of the use of external inputs	👍	✗	👍
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	✗	👍
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	✗	✗	👍

Why does that make sense?

It is crucial to meet the principles and objectives 848/2018 to:

- **Ensure credibility of the EU organic regulation / logo towards:**
  - Consumers
  - Producers of other type of organic products
  - Public authorities
  - Third countries
- **Ensure fair competition between producers**
- **Ensure the protection and the survival of sustainable salt production techniques and of thousands of producers in the EU**

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