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Directorate B. Quality, Research & Innovation, Outreach
B.4. Organics

Expert Group for Technical Advice on Organic Production

EGTOP

ADDITIONAL NOTE TO THE ION EXCHANGE RESIN PROCESS EVALUATION INCLUDED IN THE EGTOP REPORT OF DECEMBER 3-5, 2019

The European Sugar Producers Association (CEFS) claims that the EGTOP assessment of the IER dossier, submitted by France, contains some inaccuracies. Below some comments to the CEFS claims by the EGTOP group.

1. The bibliography conclusions are based on incorrect interpretations.
The EGTOP report conclusion stating that the use of ion exchange as a process for decalcification of sugar beet juice is not in line with the objectives, criteria and principles of organic Regulation (EC) No 834/2007 and, therefore, cannot be included in Annex VIIIB of the regulation was not based on the cited literature. Actually, the cited literature had a purely reconnaissance meaning of the published scientific experiences and was considered as ancillary information. The bulk of the assessment was instead based upon other considerations clearly expressed in the report.

2. The EGTOP statement that continuous processing may be conducted without IER is based on a misunderstanding.
According to the information provided by sugar manufactures, both in Switzerland and France, if the campaign lasts about two weeks, then there is no need to protect the equipment (i.e.

evaporation exchanger) from calcification (scaling). If the campaign last more than two weeks, then the decalcification before the evaporation should be done, unless deep changes in the full process are adopted. Usually, the manufacture starts with the organic sugar beet production, followed by producing conventional sugar. This is done with adding “polyacrylates” or using IE. During a two-weeks campaign it is possible to produce about 12.000 tons of organic sugar. Therefore, in this continuing process the IE is not necessary.
As a matter of fact, according to the information provided by sugar manufacturers, neither France, Germany nor Austria are currently producing such large quantities (12,000 tons) of organic sugar.
The CEFS declares that it is true that some sites store syrups to crystallize it later in the year, but that has not matter with the dossier discussed. Therefore, there is no need to further discuss what has been stated, about this issue, in the report.
What is, instead, relevant to highlight, once more, is that IER is a chemical technique and as such is not allowed in organic processing. Previous EGTOP Food I and EGTOP Food III has taken the view that the addition of ions, via ion exchange, is not in line with the objectives, criteria & principles of organic Regulations (EC) No 834/2007 (Articles 19(3), and 6 (c)) and the chemical processes involved. (Articles 4 and 21 (1)). The use of ion exchange resin in organic processing is restricted to specific requirement, like baby food production where a strict regulation rules nutritional composition. Furthermore, the EGTOP group considers that ion exchange itself is a food process and not a processing aid. Therefore, it cannot be included in Annex VIII B of the Regulations (EC) No 834/2007.

3. The unclear legislative framework

Discussions on which processes may or may not be used in organic processing, may or may not come in preparation of regulation 2018/848, do not come within the remit of EGTOP at present. However, for that assessment to happen it should not take place as a one off discussion on one process, but a set of evaluations of a range of processes against a clear set of criteria.