

# Cleaning & Disinfection in Reg. (EU) 2018/848

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# Cleaning and Disinfection Products

## Where are we today ?

### 2 organic regulations:

- **REG 2018/848 (art 24) Authorisation of products and substances for use in organic production**

1. The Commission **may authorise** certain **products and substances** for use in organic production, and shall include any such authorised products and substances **in restrictive lists**, for the following purposes:

(g) as products for cleaning and disinfection **in processing and storage facilities.**

- **REG 2021/1165 (art. 5)**

3. For the purposes of point (g) of Article 24(1) of Regulation (EU) 2018/848, only the **products listed in Part C of Annex IV** to this Regulation may be used for cleaning and disinfection in processing and storage facilities,

# 1 deadline: applicable from 1 January 2024

- Today it is the 12<sup>th</sup> of May : **Annex IV / Part C is empty**
- 7 months (or less) are not enough for organic processors and for C&D producers to adapt to a possible new system
- It is not feasible for organic processors to anticipate the actions to be implemented in order to respect this deadline.
- Visibility, clarity and reassurance are needed for the next steps and an appropriate transitional period for adaptation to the new system

# Need of clarity : 1 scope to be specified

- “the products listed in Annex IV, Part C”

- ❖ **C&D finished products** ? => not the trade names of the products, but the products whose formulation limits the impacts on health and the environment, or
- ❖ **Substances that make up the C&D products?** => If yes,
  - is it all the substances that make up the product ?
  - or only some categories of substances (cleaning agent, biocide, co-formulant) ?

**We should not forget that operator are using “finished products”**

- “processing and storage facilities “

- ❖ only surfaces in contact with foodstuffs or also other surfaces (floors, walls, equipment...), manual hygiene...?
- ❖ only production and storage areas or all processing facilities?

- “such authorised products and substances in restrictive lists”

- ❖ only a positive list or negative list?
- ❖ could it be a list of restrictive criteria on hazards that do not comply with the principles of organic farming regulations ?

# Our needs for reassurance :

- **Any proposal must ensure that**
  - ❖ the **food safety must be efficiently guaranteed** by organic operators.
  - ❖ the need to **reduce the negative environmental impact** of these C&D products.
  - ❖ the requirements for C&D products in the Organic Regulation **must be controllable for operators** as well **as for control bodies and authorities**.
- **Consequently, all stakeholders need**
  - ❖ **a clear vision** and
  - ❖ **a roadmap with clear objectives** to be achieved **step by step** to maintain the course all over the time.
  - ❖ **enough time** to adapt to new requirements.
- It is **essential for the C&D industry** in order to develop new products as well as for implementation and evaluation of the effectiveness **for organic operators**.

# Our vision and proposals :

- We propose that the **implementation of the new requirements** for C&D products needs to be done carefully, **preferably step by step**, in a framework of continuous improvement.
- Most of the preliminary work done by the stakeholders consider that :
  - ❖ **surfaces in contact with food would be reasonable starting point** and an appropriate approach for the new requirements
  - ❖ an **exhaustive positive list or negative list of C&D substances or products is not a realistic concept** at all.

Beyond the conceptual notion, from a very pragmatic point of view, **a positive list could lead to the blockage of the organic sector.**

Thus, **if the list of 216 priority substances (defined by Commission) is authorized 80% of operators would have 0 compliant C&D product** (result of a Synabio survey carried out in 2020).

# We tried to find a solution with a positive list BUT we have more questions than answers

Who can **establish and update a positive list** and according to **what clear criteria?**  
**Is an assessment planned of the impact** of the final solution ?

How shall we take into account the fact that a **dangerous substance used pure is no longer necessarily dangerous when used diluted** ?

On the other hand, how can the **cocktail effect be taken into account** when mixing several substances in the final product?

How will **operators and certifying bodies** know **if the product is compliant** or not **in absence of knowledge of the composition of C&D products** ?

## Who have the answers?

## Are the answers in the EGTOP report?

**We are working since end 2019**

**Our proposal is based on**

- **3 conformity criteria**
- **at the C&D product level**
- **indicated in the SDS**

**Safety Data Sheet**

**1 ) Absence of hazards deemed non-compliant with organic regulation**

**24 toxicity and safety hazards** (H300, H301, ...)

**6 environmental hazards** (H400, H410 ...)

**Section 2.1**

**2 ) Absence of hazardous substances in the composition**

**SVHC** substance of very high concern

**PBT ou vPvB** persistent, bioaccumulative and toxic substances (PBT substances) and very persistent and very bioaccumulative substances (vPvB substances),

**Section 2.3**

**3 ) Absence of phosphates and / or phosphonates**

**Section 15**

**These criteria are not fixed and can be improved.**

**But we are blocked since 2021 due to the absence of visibility**

**A step-by-step implementation is to be considered.**





# We already shared the results of our european survey on the applicability of our proposal with DG AGRI

Our proposal is only a proposal but a proposal which:

- is based on **a pragmatic approach consistent with the intentions of the organic regulation.**
- is **sustainable over time** (can be implemented step by step).
- is a **simple but demanding solution.**
- has been **tested with many operators.**
- **clearly aims to reduce the environmental impact** of C&D products for the benefit of our planet.

# Other stakeholders are also working on this topic :

- **AISE** (European Federation of C&D Producers)
- **FIBL**

⇒ To be totally transparent none of the 3 solutions is totally perfect, as the topic is so complex !!!

**But many points are common and should provide a good basis for the Commission or EGTOP to work on.**

# Conclusion :

- **This is a complex topic!** It is necessary to consider the organic regulations and all the regulations relating to C&D or chemical products but also the reality of the C&D products composition currently used to ensure the sanitary safety of foodstuffs presenting very varied microbiological risks.
- **This subject is important for the organic sector,** in terms of consistency with the principles of the organic regulation and environmental impacts.
- **The solution must not block the organic sector.**
- It is already complicated to define criteria, so it will be even more complicated to apply them => **That is why we have to work step by step.**
- **IFOAM, AISE and FIBL propose to support the Commission and EGTOP** to find the best solution for all of us.
- **January 1st is tomorrow!** What should we do?