

Gap Analysis: Old OF&G Standards versus New OF&G Standards

Area	Old OF&G Standards	New OF&G Standards
INGREDIENTS		
The food additives etc which are permitted in organic food are set out in Annex VIII and the non organic ingredients which are permitted in organic food are set out in Annex IX of 889/2008.		
Food Additives		<p>The use of the following substances shall be re-examined before 31 December 2010:</p> <p>(a) Sodium nitrite and potassium nitrate with a view to withdrawing these additives;</p> <p>(b) Sulphur dioxide and potassium metabisulphite</p> <p>(c) Hydrochloric acid for the processing of Gouda, Edam and Maasdammer cheeses, Boerenkaas, Friese, and Leidse Nagelkaas.</p> <p>The re-examination referred to in point (a) shall take account of the efforts made by Member States to find safe alternatives to nitrites/nitrates and in establishing educational programmes in alternative processing methods and hygiene for organic meat processors/manufacturers.</p>
	E 160b Annatto, Bixin, Norbixin Permitted for use in Red Leicester cheese; Double Gloucester cheese; Scottish Cheddar ; Mimolette cheese production	E 160b Annatto, Bixin, Norbixin Permitted for use in Red Leicester cheese; Double Gloucester cheese; Cheddar ; Mimolette cheese production
	No food additives had to be calculated as ingredients of agricultural origin	<p>As of 1 July 2010 the following food additives must be calculated as ingredients of agricultural origin:</p> <p>E 160b Annatto, Bixin, Norbixin E 306 Tocopherol-rich extract E 322 Lecithins E 410 Locust Bean Gum E 412 Guar Gum E 414 Arabic Gum E 440 Pectin</p>
Processing Aids	E 270 Lactic acid not a permitted processing aid	E 270 Lactic Acid permitted for the regulation of the pH of the brine bath in cheese production
	E 330 Citric acid permitted in oil production and hydrolysis of starch	E 330 Citric acid permitted for oil production and hydrolysis of starch, regulation of the pH of the brine bath in cheese production

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Processing Aids cont	Sulphuric Acid permitted for sugar(s) production	Sulphuric Acid permitted for sugar(s) production and gelatin production
	Hydrochloric acid not a permitted processing aid	Hydrochloric acid permitted in gelatin production and for the regulation of brine bath in the processing of Gouda, Edam and Maasdammer cheeses, Boerenkaas, Friese and Leidse Nagelkaas.
	Isopropanol (propanol-2-ol) permitted for use in the crystallisation process in sugar preparation	Isopropanol (propanol-2-ol) no longer permitted
	Ammonium Hydroxide not a permitted processing aid	Ammonium Hydroxide permitted in gelatin production
	Hydrogen Peroxide not a permitted processing aid	Hydrogen Peroxide permitted in gelatin production
	Talc – no specific conditions of use as a processing aid	Talc – must comply with the specific purity criteria for food additive E 553b
Permitted non-organic agricultural ingredients	Smoked Coriander is a permitted non-organic agricultural ingredient	Smoked Coriander not permitted as a non-organic agricultural ingredient
Yeast		The basic requirements for the production of organic yeast for food and feed have been outlined in Article 20 of Council Regulation (EC) No 834/2007 and the detailed rules for the production of organic yeast are contained in Commission Regulation 1254/2008 which is an amendment to Commission Regulation (EC) No 889/2008.
LABELLING		
The rules on labelling for organic food are set out in Articles 23 to 25 of 834/2007 and Articles 57 and 58 of 889/2008.		
Control body codes	All organic products packed and/or labelled within the EU must carry the code of the relevant certification body. For Organic Farmers & Growers this is "Organic Certification UK2".	All organic products packed and/or labelled within the EU must carry the code of the relevant control body. For Organic Farmers & Growers this is " GB Organic Certification 2 ". The new control body codes will be required to be used on all produce packed, or packed and labelled, in the EU from July 1 st 2010. This must be placed immediately below the EU logo, where this is used. As part of a transitional measure labels complying with EC 2092/91 can still be used until January 1 st 2012.
EU Organic Logo	EU Organic logo not mandatory	The new EU Organic logo, still to be decided, will be introduced from July 1 st 2010. As part of a transitional measure labels complying with EC 2092/91 can still be used until January 1 st 2012.

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EU Organic Logo cont		<p>This logo will be mandatory where a product has at least 95% organic agricultural ingredients. If less than 95% of the content of agricultural ingredients of a product has been produced organically the logo cannot be used. Products in conversion are not allowed to use the EU Organic logo.</p> <p>Full details are now available on http://ec.europa.eu/agriculture/organic/logo/.</p> <p>OF&G are not requiring the mandatory use of the OF&G logo.</p>
Food composition rules 95% and 70%	<p>The '95% Rule': A food product may be called 'organic' when at least 95% of the agricultural ingredients are organic and the remainder come from the lists of Approved Ingredients, Additives or Processing Aids</p> <p>The '70% Rule': The label of a food product may make reference to organic ingredients where 70% of the agricultural ingredients are organic and the remainder come from the lists of Approved Ingredients, Additives or Processing Aids</p>	<p>The 'equal to or greater than 95% Rule': A food product may be called 'organic' when at least 95% of the agricultural ingredients are organic and the remainder come from the lists of Approved Ingredients, Additives or Processing Aids</p> <p>The 'less than 95% Rule': If less than 95% of the agricultural ingredients has been produced organically the term organic can only be used to refer to the ingredients which have been organically produced in the list of ingredients on the product label or accompanying documentation.</p> <p>In this case the ingredients list must also carry a declaration of the proportion of the agricultural ingredients that has been produced organically.</p>
Place of origin	Place of origin for product ingredients must be clearly stated on the label	<p>There must be an indication of the origin of the agricultural raw materials, taking one of the following three forms:</p> <ul style="list-style-type: none"> • Where ingredients originate from within the EU the product must be labelled as 'EU Agriculture' • Where ingredients originate from outside the EU the product must be labelled as 'Non-EU Agriculture' • Where ingredients originate from both inside and outside the EU the product must be labelled as 'EU/Non-EU Agriculture' <p>The indication 'EU' or 'non-EU' may be replaced or supplemented by the country of origin in the case where all agricultural raw materials of which the product is composed have been farmed in that country.</p> <p>For the 'EU' or 'non-EU' indication, small quantities by weight of ingredients may be disregarded provided that the total quantity of the disregarded ingredients does not exceed two per cent of the total quantity by weight of raw materials of agricultural origin.</p>

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Place of origin cont		The new Place of Origin details will be required to be used on all produce packed, or packed and labelled, in the EU from July 1st, 2010 and must appear immediately below the control body code number. However as part of transitional measures, packaging and labels complying with EC 2092/91 can continue to be sold until January 1, 2012
IMPORTING Covered by EC 834/2007 and Commission Regulation 1235/2008.		
Importing from within and outside the EC	<p>Imported goods referred to as either:</p> <ol style="list-style-type: none"> 1. Goods from within the EC 2. Good from outside the EC from approved 3rd Countries <ul style="list-style-type: none"> • Argentina • Australia • Costa Rica • India • Israel • New Zealand 3. Goods from outside the EC from non-approved third countries. <p>Defra authorisation is required if the import is from a non-approved third country. An OB11 form is required for this.</p>	<p>Currently in a transitional period so the same system as the old OF&G standard is still in place.</p> <p>We will be moving to a new system with the following categories:</p> <ol style="list-style-type: none"> 1. Direct access 2. Equivalent Countries <ul style="list-style-type: none"> • Argentina • Australia • Costa Rica • India • Israel • New Zealand 3. Equivalent Operators <p>During this transitional period Defra import authorisations are still required for goods from non-approved third countries (to be known as Equivalent Operators). However, this will be replaced with a list of recognised third country organic inspection/control bodies. The Port Health Authority will use this list to approve imports of organic products.</p> <p>See attached summary.</p>