

# Latest opportunities and challenges in the current regulation

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## Challenge: CLEANING AND DISINFECTION



The lists of products for cleaning and disinfection will not be established before 1 January 2026 (EGTOP)

Annex VII to Regulation (EC) No 889/20087 should continue to apply until 31 December 2025.

## Challenge (but we'll talk about this later)



Jessica Polfjärd, rapporteur

*“(...) The rapporteur also believes that NGTs should be allowed and enabled in organic farming.*

*The purpose of this draft report is to ensure that any operators without discrimination can use the techniques. Thus, the proposed ban by the Commission for the techniques to be used in organic farming is lifted to ensure a fair playing field without imposing the technique on any operator”.*



## Challenge: INGREDIENTS

“All seaweeds are equal, but some are more equal than others”

**NON ORGANIC** ARAME



**NON ORGANIC** HIJIKI



**ORGANIC** LITHOTAMNIUM



## Challenge: DIFFERENT APPROACHES IN MEMBER STATES REGARDING ARTICLE 28

In Italy, for example, an operator can consider the product compliant only if it is negative in the analysis.

If there is any analytical positivity even under the LOQ, he cannot initiate his own checks, but must identify and separate the product concerned and is required to report the case to the control body so that it can start the official investigation.





# Challenge: NAME OF (SOME) FOODS

Conseil d'État → Court of Justice of the European Union

Waiting for an answer that settles things once and for all



(F) Décret n° 2022-947 du 29 juin 2022 relatif à l'utilisation de certaines dénominations employées pour désigner des denrées comportant des protéines végétales

(I) Disposizioni in materia di divieto di produzione e di immissione sul mercato di alimenti e mangimi costituiti, isolati o prodotti a partire da colture cellulari o di tessuti derivanti da animali vertebrati nonché di divieto della denominazione di carne per prodotti trasformati contenenti proteine vegetali





**some turbulence about the F2F strategy...**

# EVERYTHING IS STILL UP IN THE AIR

## ECO-SCORE





# IN THE AIR: GREENWASHING



Proposal for the Green Claims Directive

*“Organic farming and organic production need to be developed further”*

- Substantiation of explicit environmental claims
- Substantiation of comparative explicit environmental claims
- Communication of explicit environmental claims
- Environmental labels
- Requirements for environmental labelling schemes
- Verification and certification of environmental claims and environmental labelling schemes by a accredited third-party conformity assessment body

# IN THE AIR: GREENWASHING



## Watch out for tricks

(the fact that it is the member states who decide does not necessarily reassure)

**France** introduced in 2011 “*Haute Valeur Environnementale*” label which the Cour des comptes, the EU Commission and the report of the French Biodiversity Commission consider insufficient.

**Italy** introduced in 2014 a “*Sustainable Quality*” label, available to “integrated farms” (IPM) even if practically no one uses it and no one knows about it.

**Bulgaria** in 2021 tried to introduce an “*ECO Product*” label on fruit and vegetables with a pesticide residue and nitrates content at least 10% below the MRL (decision set aside)



## IN THER AIR: ANIMAL WELFARE



“Fitness Check” of the EU legislation on the welfare of farmed animals closed on January 2022.

F2F included an initiative to ensure a harmonised approach with regard to the protection of animals and their welfare, and to create a level playing field across the Union.

Drafts not available at the moment, a postponement to the new parliament cannot be excluded, but at least theoretically we have to expect something.

# NOT EVERYTHING IS BAD





## OPPORTUNITIES: PROMOTION

Regulation (EU) No 1144/2014 on information provision and promotion measures concerning agricultural products (internal market and third countries)

Information provision and promotion measures may cover

(a) PDO, PGI quality schemes

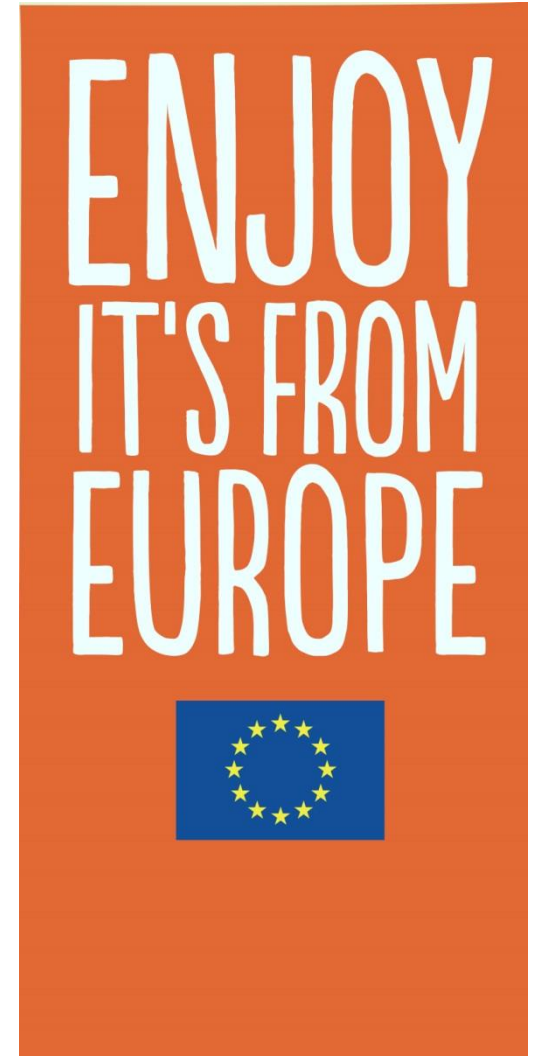
**(b) the organic production method**

(c) logo for quality agricultural products specific to the outermost regions of the EU

(d) optional certification schemes recognized by MS as compliant with the EU guidelines on best practices

**2023: 44 million EUR**

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# OPPORTUNITIES: GREEN PUBLIC PROCUREMENT

## COM Action Plan for the development of organic production

Integrate organic products into the **minimum mandatory criteria** for sustainable food public procurement to be developed as part of the legislative framework for sustainable food systems

Stimulate a **greater uptake of organics in public canteens** and invite Member States to fix **ambitious national targets** for organics in GPP

- *FRANCE: loi Egalim: min 20% organic products (current estimate 6%)*
- *ITALY: in schools 100% organic: eggs, milk, yogurt, fruit juices, jams, marmalades, baby food; min 50%: fruit, vegetables, beans, grains, beef; min 40%: extra virgin olive oil; min 33%: tomato products; min 30% cheese etc.*



## OPPORTUNITIES: GREEN PUBLIC PROCUREMENT



A child eats 50 g of bread, 70 g of pasta and 150 g of fruit, but the 140,000 children who eat in school in Rome eat

**7 tons** of bread,  
**9.8 tons** of pasta and  
**21 tons** of fruit.

**Per day.**

**Only in Rome.**

Challenge/opportunity

## REGULATION (EC) No 1924/2006 on nutrition and health claims made on foods

An application for authorisation  
of a new health claim may be  
submitted, but (please!)  
in accordance with art.15,  
with independent,  
peer-reviewed studies  
and the clear  
characterisation  
of the food/constituent  
that is the subject  
of the health claim



NUTRITION UNIT

By email only

Subject:

Application on "Organic food (lower levels of pesticide residues than those in conventional food)" and "contributes to the protection of body cells and molecules (lipids and DNA) from oxidative damage" submitted to the Competent Authority of Cyprus (Claim Serial No: 0502\_CY, EFSA-Q-2021-00055)

Request for supplementary information

Dear Sir/Madam,

With reference to the above-mentioned application which you submitted on behalf of Cyprus International Institute for Environmental and Public Health, Cyprus University of Technology to the Competent Authority of Cyprus (Claim serial No: 0502\_CY), the Working Group (WG) on Claims of the NDA Panel seeks supplementary information in order to proceed with the scientific assessment of submitted dossiers, in accordance with Article 16(1) of Regulation (EC) No 1924/2006.

- The characterisation of the food/constituent is requested on the following:

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Ref. VC/JC/gp (2021) –out-OC-2021-24754026

Cyprus International Institute for  
Environmental and Public Health, Cyprus  
University of Technology  
1 Prodromou & Chilonos Street 17  
1448 Nicosia, Cyprus



Challenge/opportunity

## REGULATION (EC) No 1924/2006 on nutrition and health claims made on foods

EFSA rejected a claim

*“Organic food contributes to the protection of body cells and molecules from oxidative damage”* submitted by Cyprus due to the particular study design.

We were lucky that the newspapers didn't get the headline: *“According to EFSA, organic diet is not healthy”*, so please be very careful.



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