

# SALIMAR position on Organic Salt

## Regulation (EU) 2018/848

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Customers that buy Organic Products pay a “plus” because they believe that they have an added value that non-organic products lack and it is provided by the fact that they have both a **natural origin** and a **production** behind that contribute to the **protection of the environment** and animal welfare, preserving natural resources as well as enhancing rural development.

For this reason, **salt should be considered as organic only if its source is natural** (sea water or natural brines such as spring water or salt lakes) **and its crystallization is produced uniquely by solar evaporation without added substances.**

The **Commission's Farm to Fork and Biodiversity Strategies** include the target of reaching 25% of agricultural land under organic farming by 2030. Saltworks can represent an important capital in order to develop and improve biodiversity.

### PREAMBLE

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**SALIMAR**<sup>i</sup> is the *Spanish Sea Saltworks Association* that brings together five of the most important salt producing companies in Spain. Among all of them account for 85% of the Spanish sea salt market share.

The **EU Regulation (EU) 2018/848**<sup>ii</sup> on organic production was published in 2018. This Regulation applies to agricultural, livestock and fishery products, but also to certain other products closely linked to agriculture such as **“sea salt and other salts for food and feed”**<sup>iii</sup>.

Denomination regarding “salt” has changed during the approval process. In the first draft of 2014, only “sea salt” was in the scope of the regulation. It was changed to “salt” in 2015 and “sea salt and other salts” in the last draft of 2017. Finally, **“Sea salt and other salts used for food and feed”** have been included in the scope of this Regulation because they *may be produced by applying natural production techniques, and because their production contributes to the development of rural areas, and thus falls within the objectives of this Regulation.*

In response to the COM mandate, to suggest production rules applicable to organic production of salt, the EGTOP<sup>iv</sup> published a report **that allows the use of techniques and substances to produce organic salt that, from our point of view, are not in line with the objectives of EU Regulation (EU) 2018/848.**

SALIMAR considers that the inclusion of “other salts” in the regulation should be based on the following premise: **“The source of the salt, itself, is not sufficient to determine the organic status of the salt. The process must also be “organic””.**

### POSITION

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The main **origins** for salt are *seawater, rock salt* (deposits and natural brines) and *by-product of chemical processes*<sup>v</sup>.

The existing **production techniques** of the different types of salt are diverse and not all of them apply natural protection principles or contribute to the protection of the environment.

SALIMAR considers that **sea salt** and **other salts** coming from rock salt natural brines (i.e., **spring salt** or **salt lake salts**) produced by natural evaporation are **the only ones aligned with the aim of Organic Regulation** because:

- ✓ **Their origin is natural.**

- ✓ **Their production process consists on solar evaporation** through unique action of sun and wind which raise the salt concentration to the point of crystallization. This type of evaporation has the smallest environmental impact (concerning energy consumption and CO<sub>2</sub> emission).

For reasons of consistency, we are of the opinion that the following techniques and substances to produce salt, although permitted in the rules proposed by EGTOP, **should NOT be included under the Organic scope** due to the following reasons:

- **Rock salt mining by mechanical cutting with mechanical techniques:** They are responsible for collapses and land subsidence with the consequent ecosystem destruction. These techniques require, most often, the use of **explosives** that at least and fortunately have already been explicitly prohibited by the EGTOP.
- **Use of water or non-saturated brine to dissolve rock salt by solution mining:** This technique implies high water consumption and causes landslides and leakages.
- **Evaporation through vacuum techniques (physical-thermal evaporation and crystallization processes for the production of organic evaporated salt)** which have the highest environmental impact due to their energy intensiveness leaving a large carbon footprint. Vacuum salt sector recognizes itself as an energy intensive subsector and it has been deemed at carbon leakage risk, which is obviously not compatible with being considered as organic salt producer.

Even the Expert Group on Organic Production reached consensus in 2018 that **vacuum salt should be outside of the scope or the Organic Regulation**<sup>vi</sup>.

- The use of **additives** (like ferrocyanides) and **processing aids** contradicts *EU Regulation 848/2018* according to which food and feed additives, non-organic ingredients, micronutrients and processing aids have to be used to a minimum extent. Contrary to expectations<sup>vii</sup> and without justified cause EGTOP allows some additives<sup>viii</sup> not permitted by most international organic standards and some processing aids not even regulated or allowed for this use at member state level<sup>ix</sup>.

## CONCLUSION

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Salt is a natural resource located in different areas of Europe. Salt extraction sites occur where the natural resource is located but organic salt, like many other **organic products** (e.g., olives, rice, etc.), **is produced where climatology and geographical conditions allow it** provided they accomplish the rest of Organic Regulation requirements. Salt should be considered as organic only if its source is natural brine and its crystallization is produced uniquely by solar evaporation.

**Rock salt** is organic in origin but extraction methods used (continuous mining, cutting and blasting and solution mining) are environmentally disrespectful and consequently not aligned with the principles of Regulation (EU) 2018/848.

The same goes for **vacuum salt** since vacuum evaporation techniques have the highest environmental impact. Needless to say, making salt with excess process energy coming from intensive processes does not provide any “organic” attribute either. In organic production “the end does not justify the means”.

Both rock salt and vacuum salt require the use of chemical substances for their refinement and storage. **SALIMAR** claims that **organic salt can be free of any added substances because they are not necessary for its production**. The fact that many salts without added substances can be found in the market bears this out.

From all the foregoing, we consider that only **sea salt and these other salts (spring water salt and salty lake salt)** obtained by natural evaporation means comply with the spirit of organic regulation and maintain that their production **can entirely cover food grade necessities in Europe**.

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- <sup>i</sup> **SALIMAR** is the *Spanish Sea Saltworks Association*, which main objective is the protection, diffusion and enhancement of sea salt. It was founded in 2019 as a non-profitable entity with the objective of promoting and cooperating in the development of the salt industry exclusively from sea origin that combines sustainability, economic development and employment of rural area.
- <sup>ii</sup> Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007
- <sup>iii</sup> Annex I RE (UE) 2018/848
- <sup>iv</sup> EGTOP - Final report on organic sea salt and other salts for food and feed.  
[EGTOP Annex II Draft/Final Report \(europa.eu\)](https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&code=sdg-12-6-2018-2020)
- <sup>v</sup> We agree with the EGTOP report that salt obtained as **by-product of chemical processes** (e.g. potash production) has to be excluded because of its non-natural origin
- <sup>vi</sup> **“Experts could reach consensus only for vacuum salt that in their opinion should be outside of the scope”** (MINUTES Meeting of the EXPERT GROUP ON ORGANIC PRODUCTION - SUB-GROUP ON PRODUCTION RULES FOR ORGANIC SALT , 17<sup>th</sup> October 2018)
- <sup>vii</sup> The EGTOP itself determined E-536 **was not in line with the objectives, criteria and principles of organic farming**
- <sup>viii</sup> E-535
- <sup>ix</sup> Liste des auxiliaires technologiques déclarés (article 8 du décret n°2011-509)