



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Brussels
DdF/nb/agri.ddg1.b.4(2021)4236616

Thank you for your email¹ of 8 March 2021 on the use of salt containing the additive E536 in processing of organic food.

The use of food additives and processing aids should be restricted for processing of organic food, in accordance with the specific principles laid down in Article 6 of Regulation (EC) No 834/2007². As mentioned in your letter the use of E 536 (Potassium ferrocyanide) as additive or as processing aid is not authorised: it is not listed in Annex VIII to Regulation (EC) No 889/2008³. Please accept my apologies for the late reply.

The use of salt is explicitly authorised in processing of organic food under Article 27(1)(e) of Regulation (EC) No 889/2008. Potassium ferrocyanide, E 536, is one of the authorised additives used as anticaking agent in salt in accordance with Part E of Annex II to Regulation (EC) No 1333/2008⁴. Other authorised anticaking agents for salt are also authorised for processing organic food: Calcium carbonate (E 170), Sodium Carbonate (E 500), Magnesium carbonate (E 504).

In light of the above and pending a further complete description of the case set out in your email, I would conclude the following: Salt without additive should be preferred when used for processing organic food. From the explanation in your letter, *“the use of salt without this additive (E 536) causes the creation in the final product of huge deposits of impurities and salt, which add to the surface of the cheese”*, it appears that E 536 has a technological function in the processing of the organic cheese at stake in your case. The behaviour of the salt in the final organic product cannot justify the use of salt with additive or processing aid not listed in Annex VIII to Regulation (EC) No 889/2008. It is therefore not authorised to use salt containing E 536 in the organic production of the cheese.

¹ Ares(2021)1749501

² [Council Regulation \(EC\) No 834/2007 of 28 June 2007 on organic production and labelling of organic products and repealing Regulation \(EEC\) No 2092/91 \(OJ L 189, 20.07.2007, p. 1\)](#)

³ [Commission Regulation \(EC\) No 889/2008 of 5 September 2008 laying down detailed rules for the implementation of Council Regulation \(EC\) No 834/2007 on organic production and labelling of organic products with regard to organic production, labelling and control \(OJ L 250 18.9.2008, p. 1\)](#)

⁴ [Regulation \(EC\) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives \(OJ L 354 31.12.2008, p. 16\)](#)

The present opinion is provided on the basis of the facts as set out in your e-mail of 8 March 2021 and expresses the view of the Commission services and does not commit the European Commission. In the event of a dispute involving Union law it is, under the Treaty on the Functioning of the European Union, ultimately for the European Court of Justice to provide a definitive interpretation of the applicable Union law.

Yours sincerely,

