






# A one-to-one comparison of the **Naturland Standards** with the EU organic regulation

## Naturland sets higher standards

Standards define what is covered by the term “organic agriculture” and how this method of agriculture is to be put into practice. The Naturland standards define the comprehensive approach intrinsic to its understanding of organic agriculture as compared to the minimum legal standards which make up the EU regulation on organic farming.

Naturland has summarised the major differences for you between the Naturland standards and the EU organic regulation (Regulation (EU) 2018/848 and the subsequent legislative acts) in the table below.

<b>Naturland Standards</b> Version 05/2023 	<b>EU regulation on organic farming</b> 
<b>1. GENERAL (inspection and transparency)</b>	
<ul style="list-style-type: none"> <li>• <b>Mandatory full farm conversion</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Partial farm conversion possible, with all the negative consequences (poor demarcation, inspection, credibility etc.)</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Implementation of requirements for social responsibility towards workers on Naturland farms world-wide</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>No regulation</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Prohibition of plant genetic engineering applicable immediately and directly to the entire farm, even in the case of gradual conversion to organic production.</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>The same farm can grow plants organically side by side with conventional produced plants using genetically modified plants</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Exclusion of nanomaterials in production and processing, due to their insufficiently known impact on the environment and human beings. Refers to all areas including external inputs.</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Exclusion of nanomaterials only in food.</b></li> </ul>

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<ul style="list-style-type: none"> <li>• Biogas plants on Naturland farms may only use a limited amount (30%) of vegetative material from conventional production which serves as fermentation material to operate the power plant. The choice of vegetative material is also severely restricted.</li> </ul>	<ul style="list-style-type: none"> <li>• No regulation</li> </ul>
<ul style="list-style-type: none"> <li>• Regulations on sustainable use of water in areas with scarce water resources (e.g. submission of water management plan, use of efficient and water-saving irrigation systems, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• No regulation</li> </ul>
<ul style="list-style-type: none"> <li>• <b>In addition to the ban on conversion of primary ecosystems (primeval forest, tundra, etc.), other natural ecosystems with high conservation values (so-called High Conservation Value Areas) are also subject to special protection.</b></li> </ul>	<ul style="list-style-type: none"> <li>• No regulation</li> </ul>

**2. ARABLE FARMING**

<ul style="list-style-type: none"> <li>• <b>Possible risk factors (dangerous waste, emission sources, and sources of contamination e. g. discharge of sewage sludge) must be eliminated.</b></li> </ul>	<ul style="list-style-type: none"> <li>• No regulation</li> </ul>
<ul style="list-style-type: none"> <li>• A minimum percentage of legumes in the main crop (e. g. clover grass) in crop rotation is required a prerequisite which must be complied with before additional external organic fertilisers can be purchased. Legumes bind the nitrogen from the air and they are the most natural form of fertiliser. Growing legumes enriches the variety of crop rotation and reduces disease pressure.</li> </ul>	<ul style="list-style-type: none"> <li>• No regulation</li> </ul>
<ul style="list-style-type: none"> <li>• When purchasing external inputs (e.g. farm-produced fertiliser, fodder), these must be bought from Naturland farms or meet Naturland’s respective quality assurance requirements</li> </ul>	<ul style="list-style-type: none"> <li>• No regulation</li> </ul>
<ul style="list-style-type: none"> <li>• Positive list of permissible cleaning and disinfection agents for machines, equipment and plant used in plant production</li> </ul>	<ul style="list-style-type: none"> <li>• No regulation</li> </ul>

**3. FERTILISERS**

<p><b>Clearly defined requirements of organic fertilisation:</b></p> <ul style="list-style-type: none"> <li>• The stronger limitation of the permissible animal stocking density (see 4.) and the limitation of the additional purchase quantity of fertilizers (see below) results in a</li> </ul>	<p><b>“Conventional fertilisation” possible with organic fertilisers:</b></p> <ul style="list-style-type: none"> <li>• No limitation on total fertiliser amount (internal and external) - only farm manure of animal origin is limited. Purchase of additional commercial</li> </ul>
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<p>stronger limitation of the total amount of fertilisers which can be applied on the farm (from own animal husbandry and external fertilisers)</p>	<p>fertiliser and thus significantly higher fertiliser input is possible.</p>
<p><b>Restriction on the source and kind of organic fertiliser purchased:</b></p> <ul style="list-style-type: none"> <li>• Only solid manure (except for poultry manure) from conventionally managed farms. Fermentation residue from biogas plants only if the organic farm's own fermentation material has been fermented in it and no liquid manure or poultry manure from conventional animal husbandry was used in the biogas plant; quantities limited.</li> <li>• Conventional poultry manure and conventional liquid manure are prohibited.</li> <li>• Animal meal, blood and bone meal (even as fertilisers) prohibited</li> </ul>	<p>Almost free import of commercial fertilisers, even in the form of conventional liquid manure or poultry manure with no further requirements (only those from “industrial” sources are excluded).</p> <ul style="list-style-type: none"> <li>• Animal meal, blood meal and bone meal are permitted and may be purchased as organic fertilisers (risk of BSE<sup>1</sup>)</li> </ul>
<ul style="list-style-type: none"> <li>• <u>Permissible amount of commercial organic fertiliser or farm manure which may be purchased</u> is restricted to 0.5 Dung Unit (DU)/hectare (except where required for certain specialised crops).</li> </ul>	<ul style="list-style-type: none"> <li>• No limit to amount of fertiliser which may be purchased. This means that a <u>farm can rely solely on external fertiliser.</u></li> </ul>

#### 4. ANIMAL HUSBANDRY

<ul style="list-style-type: none"> <li>• The permissible stocking density (animals per hectare of farmland) is more stringent, to guarantee an even balance between fodder and the area to which their manure is applied.</li> <li>• <u>Maximum stocking density/hectare of farmland:</u> 140 hens 280 broilers 10 fattening pigs</li> </ul>	<ul style="list-style-type: none"> <li>• Maximum stocking density/hectare of farmland: particularly in the critical sectors of product transformation, considerably more animals are possible – with all the ensuing problems (ground water, nitrate accumulation etc.).</li> <li>• The maximum limits/hectare of farmland are: <u>230 hens (64% higher nitrogen discharge)</u> <u>580 broilers (107% higher)</u> <u>14 fattening pigs (40% higher)</u></li> <li>• Besides this, it is even possible for EU member states to increase the maximum number of animals allowed per hectare</li> </ul>
<ul style="list-style-type: none"> <li>• Laying hens: When calculating the free-range areas, only those areas are included which the birds actually do use;</li> </ul>	<ul style="list-style-type: none"> <li>• All areas up to 350 m away from the stable can be taken into account when calculating the free-range</li> </ul>

<sup>1</sup> bovine spongiform encephalopathy

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<p>consequently, any areas which are over 150 m from the stable do not count.</p> <ul style="list-style-type: none"> <li>• <b>Outdoor access is mandatory at all times. Even in bad weather periods, access to an outdoor area is ensured, as covered outdoor areas are mandatory.</b></li> <li>• In any one building complex max. four separated stable units à max. 3.000 laying hens are permitted.</li> <li>• One brother from each laying hen must be raised <b>organically</b>.</li> </ul>	<p>areas - even if they are hardly used or not used at all.</p> <ul style="list-style-type: none"> <li>• Laying hens must always have access to free-range areas, if the weather permits. In bad weather periods the animals do not have access to an outdoor area, as roofing required for this purpose is not mandatory.</li> <li>• No regulation</li> <li>• No regulation</li> </ul>
<ul style="list-style-type: none"> <li>• Separate specific regulations for rearing of pullets, e. g. feeding with organic fodder, no coccidiostatics, chicken runs available even at this stage</li> </ul>	<ul style="list-style-type: none"> <li>• No regulation</li> </ul>
<ul style="list-style-type: none"> <li>• Prohibition of cow trainers (electrical aids used to prevent the cows' natural excretion behaviour)</li> </ul>	<ul style="list-style-type: none"> <li>• No regulation</li> </ul>
<ul style="list-style-type: none"> <li>• Detailed regulations for the transport of animals for slaughter, e.g. space requirements, maximum transport times and distances, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• No regulation</li> </ul>
<p><b>5. FODDER</b></p>	
<ul style="list-style-type: none"> <li>• <b>Self-sufficiency with farm-grown fodder is to be aimed at; at least 50% of the fodder must come from the farm itself (nutrient cycle) – also in the case of pigs and poultry!</b> (or from a farm which supplies fodder under a contractual agreement approved by Naturland and, in return, applies the manure from its partner's farm to its own fodder crops).</li> </ul>	<ul style="list-style-type: none"> <li>• In the case of pigs and poultry, only 30% of the fodder must be grown on the farm itself or "in the same region".</li> </ul>
<ul style="list-style-type: none"> <li>• <b>The positive list of feed for monogastric mammals and birds (only for piglets and young poultry) which is not yet available in sufficient quantity from organic sources, is restricted to a very few, clearly defined protein feedstuffs.</b></li> </ul>	<ul style="list-style-type: none"> <li>• There is no longer a positive list of conventional fodder that may be used. Consequently, <i>any</i> protein feedstuffs, being from vegetative or animal sources, may be used for piglets and young poultry, if they are produced and treated without the use of chemical solvents.</li> </ul>
<ul style="list-style-type: none"> <li>• Dairy and mother cows, sheep and goats: exclusive feeding with silage all year round is prohibited. In summer, green forage must be offered. This is usually covered by the mandatory grazing required by Naturland. Only in a few, justified exceptional cases an exemption to mandatory grazing can be</li> </ul>	<ul style="list-style-type: none"> <li>• No regulation, which means that even in summer, when fresh grass would be available, it is possible to feed the cattle silage only</li> </ul>

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<p>prompted. In these cases, green feeding in the stable is mandatory.</p>	
<ul style="list-style-type: none"> <li>Concentrated feed that are in competition with food products for human consumption is limited to a maximum of 20% of the annual ration on the farm for dairy cows.</li> </ul>	<ul style="list-style-type: none"> <li>Concentrated feed use in dairy cows allowed up to 40% of the ration (even up to 50% for 3 months).</li> </ul>

**6. VEGETABLE GROWING/SPECIAL CROPS/PERMANENT TROPICAL PLANTATIONS**

<ul style="list-style-type: none"> <li><b>Prohibition of CMS hybrids (cytoplasmic male sterility) from protoplast fusion</b> - transfer of genetic material from one species to another in a manner which is not possible naturally (with traditional cultivation techniques) (transition to genetic engineering processes)</li> </ul>	<ul style="list-style-type: none"> <li><b>Use of CMS hybrids permissible</b></li> </ul>
<ul style="list-style-type: none"> <li>Prohibition of pyrethroids</li> </ul>	<ul style="list-style-type: none"> <li>Use of pyrethroids (= synthetic insecticides) permitted</li> </ul>
<ul style="list-style-type: none"> <li>Prohibition of chemically synthesised inputs</li> </ul>	<ul style="list-style-type: none"> <li>Approval of chemically synthesised inputs (art. 24) can be given in exceptional cases.</li> </ul>
<ul style="list-style-type: none"> <li>The amount of copper (Cu salts) permissible is strictly limited: max 3 kg/hectare/year; max. 4 kg/hectare/year for hops.</li> </ul>	<ul style="list-style-type: none"> <li>Use of copper: considerably higher single-year quantities permissible - and higher applications are also permitted as a 7-year average: up to 28 kg within 7 years.</li> </ul>
<ul style="list-style-type: none"> <li>Open field vegetable cultivation: limitation of the total amount of fertiliser of 110 kg nitrogen/hectare and year</li> </ul>	<ul style="list-style-type: none"> <li>No special consideration of total permissible amount of nitrogen fertilisers in open field vegetable cultivation</li> </ul>
<ul style="list-style-type: none"> <li>Mushroom cultivation: organic source materials, components and supplementary substances of the substratum must come from organic production</li> </ul>	<ul style="list-style-type: none"> <li>Substratum may contain up to 25% conventional substances (e. g. poultry manure).</li> </ul>
<ul style="list-style-type: none"> <li>Viticulture/fruit cultivation: limitation of the total amount of fertiliser in a three-year rotation cycle (total of max. 150 kg of nitrogen/hectare) in viticulture and of 90 kg nitrogen/hectare and year in fruit cultivation</li> </ul>	<ul style="list-style-type: none"> <li>No special consideration of total permissible amount of nitrogen fertilisers in viticulture/fruit cultivation</li> </ul>
<ul style="list-style-type: none"> <li>Restriction of use of peat to a maximum of 80% for seedlings (including potted herbs) and to a maximum of 50% in all other substrates (e. g. potted ornamental plants, tree nursery containers etc.), no extensive application as an input for enriching the soil</li> </ul>	<ul style="list-style-type: none"> <li>No restriction on the amount of peat; turf may be used 100% in substrates and applied extensively to enrich the soil.</li> </ul>
<ul style="list-style-type: none"> <li>Coffee and cocoa must be cultivated in an agroforestry system with shade trees and a large variety of plant species.</li> </ul>	<ul style="list-style-type: none"> <li>No specific regulations for tropical permanent crops</li> </ul>

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<ul style="list-style-type: none"> <li>Bananas are to be cultivated in mixed crops or agroforestry systems. If this type of cultivation is not feasible, a biodiversity area around and in the crop of up to 10% is required for plantations areas from 5 ha onwards.</li> </ul>	<ul style="list-style-type: none"> <li>No specific regulations for tropical permanent crops</li> </ul>
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## 7. AQUACULTURE

<ul style="list-style-type: none"> <li>In accordance with welfare-oriented animal husbandry and ecological balance, the <b>stocking densities are more limited to:</b>  <b>20 kg trout &amp; arctic charr per cubic metre</b>   <b>10 kg seabream and seabass per cubic Metre</b>   <b>160 g shrimps per square metre</b></li> </ul>	<ul style="list-style-type: none"> <li>For EU organic operations, higher maximum upper limits apply:   <b>up to 25 kg trout &amp; arctic charr per cubic metre</b>  <b>up to 15 kg seabream and seabass per cubic metre</b>   <b>up to 240 g shrimps per square metre</b></li> </ul>
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<ul style="list-style-type: none"> <li><b>Antibiotics</b> and conventional medication are <b>forbidden</b> for shrimps.  For fish, the use of conventional medication is strongly limited.</li> </ul>	<ul style="list-style-type: none"> <li>Antibiotics and conventional medication are permitted for shrimps.  For fish, the regulations concerning conventional treatments are less strict as well (<i>general permission of conventional medication, no or only little limitation according to species and number of treatments</i>).</li> </ul>
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<ul style="list-style-type: none"> <li>Regular <b>analyses</b> of water, sediment, feed and finished product are required.</li> </ul>	<ul style="list-style-type: none"> <li><b>Analyses are not mandatory.</b></li> </ul>
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<ul style="list-style-type: none"> <li>Shrimp producers are obliged to <b>reforest</b> former <b>mangrove areas</b>.</li> </ul>	<ul style="list-style-type: none"> <li><b>No regulation</b></li> </ul>
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<ul style="list-style-type: none"> <li>Specific requirements apply to the keeping of cleaner fish such as: The installation of shelters to increase animal welfare. Provision of organic supplementary feed adapted to the respective species.</li> </ul>	<ul style="list-style-type: none"> <li>No regulation</li> </ul>
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## 8. IMPORTANT EXAMPLES IN THE SPHERE OF PROCESSING

<ul style="list-style-type: none"> <li>Source of raw goods is clearly defined and complies with the requirements of Naturland's standards</li> </ul>	<ul style="list-style-type: none"> <li>Any raw goods from sources anywhere in the world possible (focus on lowest possible global prices) from producers working to the lowest possible permissible standards, even, for example, from countries only operating to standards equivalent to the EU organic regulation</li> </ul>
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<ul style="list-style-type: none"> <li>• <u>Processing standards specific to certain product groups</u>, e. g. comprehensive and detailed processing standards for milk and dairy products, meat and meat products, aquaculture products, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Appendix VIII of the regulation governs the ingredients, additives and auxiliary substances permitted. Permission is general: only in isolated cases is permission for ingredients, additives and auxiliary substances <u>restricted to individual groups of products or specific purposes</u></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Exclusion of certain processing methods</b> (e. g. prohibition of enzymes for bread and bakery products, fining using “Farbebier” (a special colour preparation) or roasted malt extract, the chemical modification of edible fats, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• No regulation</li> </ul>
<ul style="list-style-type: none"> <li>• No possibility to label individual ingredients as organic (i. e. if the actual product is not organic, but only a small portion).</li> </ul>	<ul style="list-style-type: none"> <li>• Risk of deceptive advertising due to the possibility of labelling individual ingredients as organic in the list of ingredients in a conventional product with less than 95% organic share.</li> </ul>
<ul style="list-style-type: none"> <li>• Positive list of permissible food additives is much shorter and restricted to specific purposes and product groups. Naturland allows less than half of the permissible EU additives (56).</li> </ul>	<ul style="list-style-type: none"> <li>• More general positive list of permissible food additives. EU processors can use 56 different additives</li> </ul>
<ul style="list-style-type: none"> <li>• Restrictive permission for the use of natural flavourings and enzymes specific to specific product groups</li> </ul>	<ul style="list-style-type: none"> <li>• General permission for natural flavourings and enzymes</li> </ul>
<ul style="list-style-type: none"> <li>• The preservation of shrimps with sodium metabisulphite (suspected to be allergenic or to trigger asthma) is not allowed.</li> </ul>	<ul style="list-style-type: none"> <li>• The use of sodium metabisulphite for preservation is allowed.</li> </ul>
<ul style="list-style-type: none"> <li>• Salting by injection for fish smoking is not allowed.</li> </ul>	<ul style="list-style-type: none"> <li>• Salting by injection is allowed.</li> </ul>
<ul style="list-style-type: none"> <li>• For fodder processing, the processing plant (dedicated solely to organic fodder) must be installed in a separate area to the one used to process conventional fodder.</li> </ul>	<ul style="list-style-type: none"> <li>• Conventional and organic fodder can be processed in the same plant (risk of contamination)</li> </ul>
<ul style="list-style-type: none"> <li>• Comprehensive <b>standards on transport and slaughtering</b> with detailed regulations on the transport of animals for slaughter (incl. equipment used in vehicles to transport livestock), delivery and transfer to the slaughterhouse, housing, stunning and bleeding.</li> </ul>	<ul style="list-style-type: none"> <li>• No regulation.</li> </ul>
<ul style="list-style-type: none"> <li>• Products that explicitly target <b>children</b> through presentation and marketing must comply with the recommendations of the World Health Organization (WHO) to <b>protect</b> this particular consumer group <b>from products with an unbalanced nutritional</b></li> </ul>	<ul style="list-style-type: none"> <li>• No regulation</li> </ul>

Naturland Standards

Version 05/2023



EU regulation  
on organic farming



**profile** (exception for traditional seasonal products for a limited period).



The examples cited below describe situations in practice which comply with the EU regulation on organic farming but are **not** possible under the Naturland standards.

### 1. Partial conversion to organic:

An EU organic farmer can **convert part of his farm only to organic agriculture** (e. g. dairy cattle).

- At the same time the farmer can continue to keep conventional battery hens (small group systems) and feed them on medicated intensive fodder.
- The poultry manure, with all its **residual risks**, can even be spread on the fodder-growing areas of the organic section of the farm.
- The milk is sold in the shops as organic, from cows kept and fed according to the principles of organic farming.
- If the farmer who has converted only part of his farm to organic wants to, he can continue to have conventional artificial fertiliser in stock, **and no-one would be able to prove which areas he applied it to.**

### 2. No fodder produced on the farm:

A large facility with laying hens, managed according to the EU organic standards, can be run **without producing any of its own fodder** - only 30% of fodder has to be produced "in the same region".

- The producer can feed his hens with **fodder purchased completely from external sources**, even from abroad, and have it transported to his country by ship (risk of genetic engineering).
- If the producer complies with EU organic standards, he can keep **many more animals** - because he is not required to produce his own fodder (and also the limits of animal stocking density are higher).
- The gained **manure has to be disposed of in other areas** and can lead to overfertilisation and contamination of the soil and ground water there.
- **Fodder and manure have to be transported long distances in some cases**, which makes a considerable negative impact on the climate.

### 3. No limit to amount of fertiliser:

An EU organic farm is allowed to buy and use further **commercial fertilisers containing nitrogen, without restriction**, to be used in addition to the fertiliser it produces itself.

- This considerably increases the risk of high rates of nitrate e. g. in vegetables - and at the same time of nitrate leaching or displacement into the ground water.

### 4. Fertilisers from questionable sources:

An EU organic arable farm can fertilise its organic areas on a regular basis with conventional liquid manure from pigs or conventional poultry manure - i. e. **fertilisers from problematical farming systems**.

- The excrement of these species in particular is more often found to contain antibiotics (**problems associated with residues and resistance**) and other medication under conventional farming conditions.
- The conventional fertiliser can be procured from a neighbour with a conventional farm or even from conventional parts of the farmer's own farm, which leaves the door wide open to abuse (**surveillance problems**).
- It is then no longer necessary for the farmer to grow his own legumes, which is the actual basis of nutriment supply in organic agriculture. However, this will lead to greater disease pressure on the additional crops.

The examples cited below describe situations in practice which comply with the EU regulation on organic farming but are **not** possible under the Naturland standards.

The farm could also apply to animal meal or bone meal, which are considered critical since BSE times.

#### **5. Dangerous waste:**

A problematic history or even dangerous waste is not considered an important issue on EU farms.

- Areas of an EU organic farm on which sewage sludge was discharged for a long period and up to shortly before conversion can be producing organic fodder twelve months later, which may comprise up to 100% of the fodder used on the farm itself, for example as feed for its cows, the milk of which can then already be labelled as organic.

#### **6. Controllability/credibility:**

A farm specialising in growing vegetables e.g. farms 40 hectares and decides to convert four hectares to organic agriculture according to the EU regulation on organic farming.

- Accordingly, the farmer can then grow, for example, organic kohlrabi on these four hectares, for sale. He can also grow kohlrabi on his conventionally farmed area, as long as it is a different variety (parallel production = **surveillance problems**).
- The farmer specialising in growing vegetables can, however, legally establish two separate entities (two different limited liability companies). He can be farm manager on both and could produce vegetables of organic and conventional quality in the immediate vicinity of each other (parallel production = **surveillance problems**).
- A conventional strawberry farm with 30 hectares of pick-your-own strawberries can include an organic strain in its range, grown on an adjoining one ha strawberry field. **Such constellations soon reach the limits of controllability.**

#### **7. Social aspects:**

In many countries there are comprehensive laws governing working conditions and social aspects. However, they are often poorly implemented or monitored. Naturland's social standards are part of the general production and processing standards and compliance to them is regularly monitored in the course of organic inspections.

In the plant, for example, of a processor in Africa or Asia adhering to the EU regulation on organic farming, there are no mechanisms to inspect social aspects besides those established by the state.

*This can mean, for example, that:*

- some children have to spend so much time at work that it is impossible for them to attend school regularly.
- safety in the workplace is not taken seriously and, for example, potentially very dangerous areas, such as stairs or machines, are not guarded or marked. This can present great risk to accidents for all the workers.
- plants do not pay their workers a fixed f minimum wage.
- an employer makes it difficult or impossible for unions to be established or workers to perform collective activities.

The examples cited below describe situations in practice which comply with the EU regulation on organic farming but are **not** possible under the Naturland standards.

**8. Processing methods:**

An EU organic plant produces organic products using the following processes:

- apple juice from apple juice concentrate
- pastries using enzymes and ascorbic acid as a flour improver
- beer using rapid fermentation and fining with malt extract

**9. Processing/fruit juice concentrate:**

When producing fruit juice concentrates, the flavour partially evaporates. This is “captured” and sold separately from the concentrate itself or is added back when the concentrate is later treated. The EU regulation on organic farming permits the use of natural flavouring without any restriction. This means that it is possible, as it is common practice, for the evaporated flavours from conventional fruits to be added to organic concentrates in the later processing stages.