

**AIJN interpretation regarding organic grape juice containing SO<sub>2</sub>  
(sulphur dioxide or sulphites)**

The following European Union legislation has to be taken into account, concerning grape juice, labelled as organic product:

- Directive 2001/112/EC<sup>1</sup>
- Regulation (EC) No 834/2007<sup>2</sup>
- Regulation (EC) No 889/2008<sup>3</sup>
- Regulation (EC) No 1333/2008<sup>4</sup>
- Regulation (EC) No 606/2009<sup>5</sup>
- Regulation (EU) No 1308/2013<sup>6</sup>

**Background information on grape juice regulations and SO<sub>2</sub>**

- Grape juice (organic or conventional) is both a fruit juice according to Directive 2001/112/EC and a product of the wine sector according to Regulation (EU) No 1308/2013.
- Fruit Juice Directive 2001/112/EC modified allows the use of additives according to Regulation (EC) No 1333/2008.
- Regulation (EC) No 1333/2008 does not permit any addition of SO<sub>2</sub> to grape juice nor to grapes intended to produce grape juice from it.
- However, Fruit Juice Directive 2001/112/EC permits for grape juice in general a maximum residual amount of 10 mg SO<sub>2</sub> per litre: *“For grape juice, where sulfitation with sulphur dioxide of the grapes has been used, desulfitation by physical means is authorised, provided that the total quantity of SO<sub>2</sub> present in the final product does not exceed 10 mg/l.”(Annex I).*

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<sup>1</sup> Council Directive 2001/112/EC of 20 December 2001 relating to fruit juices and certain similar products intended for human consumption

<sup>2</sup> 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

<sup>3</sup> 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

<sup>4</sup> Regulation (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives

<sup>5</sup> Commission Regulation (EC) No 606/2009 of 10 July 2009 laying down certain detailed rules for implementing Council Regulation (EC) No 479/2008 as regards the categories of grapevine products, oenological practices and the applicable restrictions

<sup>6</sup> Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007

- Indeed, this is due to the fact that:
  - ✓ Regulation (EC) No 606/2009 «oenological practice» allows the use of SO<sub>2</sub> for wine products, in precise quantities (Annex IA point 7 and Annex IB).
  - ✓ and elimination of sulphur dioxide by physical process is also permitted for wine products (Regulation (EC) No 606/2009 - Annex IA point 8).

Consequently, non organic grape juices may contain SO<sub>2</sub> in a maximum concentration of 10 mg/l due to the fact that:

- grape juice on one hand is a fruit juice and on the other hand a product of the wine sector;
- the regulations for the products of the wine sector allow the addition of SO<sub>2</sub> to grapes processed (via grape must) into grape juice;
- and further, Fruit Juice Directive permits the elimination of SO<sub>2</sub>.

### **Background information on organic grape juice regulations**

- Organic grape juice has to comply not only with above mentioned regulation, but also with regulation on organic products (Regulation (EC) No 889/2006).
- As for Regulation (EC) No 1333/2008, organic regulation does not allow the use of SO<sub>2</sub> as additive for organic grape juice (as for conventional grape juices): SO<sub>2</sub> is not listed in Annex VIII part A of Regulation (EC) No 889/2008.
- Furthermore, Regulation (EC) No 889/2008 does not list SO<sub>2</sub> as allowed processing aid (PA) for organic grape juice (this PA is absent of the Annex VIII part B of Regulation (EC) No 889/2008).
- The use of SO<sub>2</sub> is an authorized treatment for organic products of the wine sector referred to in Article 29c (Annex VIIIa point 7 of Regulation (EC) No 889/2008).
- However, elimination of SO<sub>2</sub> by physical process is not permitted for organic products of the wine sector (treatment not listed in Annex VIIIa of Regulation (EC) No 889/2008).

Consequently, organic grape juices are not allowed to contain SO<sub>2</sub>, even in quantity <10mg/l, due to the fact that elimination of SO<sub>2</sub> by physical process is not permitted for organic products of the wine sector.

### **Conclusion**

In conclusion, grape juice labelled as organic product must not be produced from sulphitated grapes or grape must, nor by desulphurization of sulphitated grapes or sulphitated grape must, these conditions are cumulative.

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