

Berlin, the 21<sup>st</sup> January 2014

## **Expiry of validity of the "Public statement on the use of the BNN orientation value for DDAC and BAC detections in organic food products" for organic products, produced or manufactured after the 31<sup>st</sup> January 2014**

### Expiry of validity and reference to the BNN orientation value for pesticides

The public statement on the application of the BNN orientation value for DDAC<sup>1</sup> and BAC<sup>2</sup> detected in organic food from 26.07.2012 no longer applies to all products that are produced or manufactured after 31<sup>st</sup> January 2014. As a result, the BNN orientation value for pesticides is again applicable, in its current version, for DDAC and BAC. It stipulates that investigation into the cause of contamination for detected levels exceeding 0.01 mg/kg is required in order to exclude violation of organic agriculture production regulations (see details such as analytical variance and detection of multiple analytes. [http://n-bnn.de/sites/default/dateien/bilder/Downloads/BNN-Orientierungswert\\_DE.pdf](http://n-bnn.de/sites/default/dateien/bilder/Downloads/BNN-Orientierungswert_DE.pdf)). Scope of the BNN orientation value for pesticides is vegetable primary products.

### Rationale and background

Through intensive research, discussion and information exchange across all stages of food production and processing, the DDAC/BAC levels detected in organic foods have been significantly reduced since the issue became topical in the spring of 2012.

If no breach of the organic farming regulations can be established (e.g. pesticide application), the maximum permitted DDAC / BAC levels in organic food – be it of plant or animal origin – is the same as the statutory maximum levels for conventional foods. At the date of the withdrawal of the statement (21<sup>st</sup> January 2014), the StALuT<sup>3</sup> guidelines were valid in which food products, listed in Annex I of the EC regulation 396/2005, would not be rejected as long as residues of DDAC or BAC were below 0.5mg/kg. BNN welcomes the replacement of this guideline with lower legally binding maximum levels as is currently (as of 21<sup>st</sup> January, 2014) under discussion.

**However, the requirements of the organic sector go beyond compliance with the BNN orientation value for Pesticides or legal requirements.** The European organic regulations currently do not restrict the use of disinfectants and cleaning agents, except for animal housing and facilities for

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<sup>1</sup> Didecyldimethylammonium chloride

<sup>2</sup> Benzalkonium chloride

<sup>3</sup> StALuT: Standing Committee on the Food Chain and Animal Health; Guidelines as regards measures to be taken as regards the presence of DDAC in or on food and feed agreed by the Standing Committee on the Food Chain and Animal Health (SCFAH) (2012) European Commission - DG SANCO, Brussels; Guidelines as regards measures to be taken as regards the presence of Benzalkonium Chloride (BAC) in or on food and feed agreed by the Standing Committee on the Food Chain and Animal Health (SCFAH) (2012) European Commission - DG SANCO, Brussels

animal production, to a greater degree than the general statutory requirements. Since disinfection agents and detergents were a contamination pathway for DDAC/BAC residues, the organic sector expressed the desire to reconsider and might restrict legally permitted disinfecting and cleaning agents, in consideration of critical aspects such as residues, bio-degradability and environmental impact. On the initiative of the Research Institute of Organic Agriculture (FiBL), the Federation of the Organic Food Industry (BÖLW), BNN and the German organic farming associations, a permitted input list of cleaning agents and disinfectants for producing and processing of organic food, into which the criteria above are integrated, has been generated. Cleaning agents or disinfectants that contain DDAC or BAC in the formulation are not included in this list. The list of cleaning agents and disinfectants for processing or producing organic food will be made public on the website: [www.betriebsmittelliste.de](http://www.betriebsmittelliste.de). The list, broken down into various processing areas, is still being created. For manufacturers of organic food lines it will provide assistance in the selection of suitable cleaning agents and disinfectants.



Meinrad Schmitt, Chairman of the Board