

BÖLW Statement

(private translation of the German-language BÖLW statement)

Non-renewal of smoke flavor primary product approvals

Berlin, January 29, 2024. Below, the Federation of Organic Food Industry e.V. (BÖLW) comments on the currently discussed non-renewal of the smoke flavor primary product approval.

As an organic umbrella organization, the BÖLW is in favor of a renewal of the primary smoke flavor product approvals and the continued approval of the CleanSmoke process. Already in 2018, the BÖLW made positive comments about approving the CleanSmoke smoking process for the production of organic food. Since then, the process has been anchored in the guidelines of several national and international organic associations and is already being used in practice by manufacturers who are members of the association. From BÖLW's perspective, the smoking process known as CleanSmoke is a future-proof and, compared to traditional smoking, more sustainable process for producing smoked plant-based and animal products. When used, the process causes only half as much CO₂ as friction smoke, a sixth compared to combustion smoke, and therefore also meets climate policy objectives. In addition, only around half the smoking material is required in comparison to conventional processes, which means that the CleanSmoke process offers a valuable contribution to improved resource protection. Due to the absence of tar and ash, cleaning the smokehouse is less time-consuming and the need for cleaning detergents is lower. In addition, the process offers great advantages in terms of occupational safety and pollution control and opens up opportunities for artisanry butcher shops in residential areas in particular to produce their own smoked meat and sausage products.

The production of health-safe and high-quality food is one of the basic principles in the organic food industry. The protection of consumers always plays a particularly important role. With regard to the innovative CleanSmoke smoking process, the BÖLW currently does not see any increased risk potential compared to traditional smoking processes. It is scientifically confirmed that combustion smoke contains higher concentrations of polycyclic aromatic hydrocarbons than smoke produced from smoke condensates. In addition, the ingredients with genotoxic potential criticized by the EFSA cannot be detected in the purified smoke used in organic processing and therefore do not represent any additional risk for consumers.

If the current approval is not extended, there will be immense challenges for affected food processing companies. In particular, there would be a lot of time and financial effort to switch back to a process that is proven to be less environmentally friendly. Especially for small and medium-sized businesses as well as companies in inner-city areas, a short-term change, as would be necessary if smoke flavourings are not extended from June 2024, cannot be implemented in practice.

With a view to the politically planned expansion of organic farming and the sustainable development of food production, the BÖLW expressly advocates that the approval of the CleanSmoke process be extended and that companies can continue to use it as well as traditional smoking processes in Germany.

The BÖLW is the leading association of German producers, processors and traders of organic food and, as an umbrella organization, represents the interests of the organic agriculture and food industry in Germany. Over 56,000 organic businesses generate annual sales of 15.3 billion euros with organic food and drinks. The BÖLW members include: Association of organic food manufacturers, Biokreis, Bioland, Biopark, Federal Association of Natural Foods, Natural Products, Demeter, Ecoland, ECOVIN, GÄA, BioMarkt interest group, Naturland, working group of ecologically committed food retailers and druggists, Reformhaus®eG and Association of Ökohöfe (see www.boelw.de/about-us/members)