

SURVEY ON ORGANIC PROCESSING COMPANIES

Roberto Pinton, 2021

Our intention was to investigate some aspects and opinions of European organic companies during 2020 and 2021, both through online questionnaires and with direct interviews during the Biofach exhibition in Nuremberg (DE), the European Organic Congress (DE) and of the Organic World Congress of Rennes (FR).

The difficulties and uncertainties associated with Covid, with the events held online and not in physical form, forced us to fall back on an exclusively online survey, followed by some detailed email/phone interviews.

A questionnaire was prepared in English, Italian, Polish and Hungarian, posted on the SurveyMonkey platform to which about 400 processing companies were directly invited to participate.

The questionnaire was also presented on the LinkedIn platform.

The organizations Polska Ekologia (PL), ÖMKI Ökológiai Mezőgazdasági Kutatóintézet (HU), AssoBio (IT) and AöL Assoziation ökologischer Lebensmittelhersteller e.V. (DE) urged their members to join the initiative.

At the end of the data collection a dozen questionnaires were subsequently discarded because they were not complete with the respondent's references or due to obvious inconsistencies.

84 complete questionnaires were considered valid, followed by telephone and / or e-mail contacts for further information with a sub-sample of 46 companies (54.8%).

The small number and the territorial distribution of the companies concentrated in 4 countries does not allow to attribute a value of representativeness to the sample; in any case, the results obtained provide a snapshot of the situation which is able to provide some useful indications.

It is also interesting to examine the differences between two more mature markets (Germany and Italy) and two in earlier stages.

1. DETAILS ON SAMPLE

COUNTRY	COMPANIES	%
HUNGARY	27	32.1%
POLAND	26	31.0%
ITALY	20	23.8%
GERMANY	10	11.9%
NETHERLANDS	1	1.2%
total		100.0%



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2. COMPANIES' DATA

The oldest company was founded in 1864, the most recent in 2019; the start of the oldest organic production dates back to 1977, so almost fifteen years before the EEC regulation n.2092 / 91, the most recent one dates back to 2020: therefore companies with greater experience in the sector and companies with more recent entry into the sector were sampled.

	Establishment	Start of organic production
Establishment of the oldest company	1864	1977
Establishment of the youngest company	2019	2020
Seniority of establishment (average)	34 years	--
Seniority of organic production (average)	--	17 years
Establishment/starting of organic production older than average	28.2%	40%

In order not to be too invasive and not to force companies to disclose too sensitive data, as regards the main economic information we have requested not exact data, but the indication of ranges that are suitable both to safeguard the confidentiality of company data and to allow classification.

The characteristics of the companies (number of employees, turnover) are also diversified: if more than a quarter of the sample is made up of micro-enterprises (according to the Commission Recommendation of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises), a slightly lower share is made up of medium-sized enterprises; a share of 7% exceeds the employment/turnover criteria for medium-sized enterprises.

Number of direct employees *	
Up to 10	27.4%
11 to 50	40.5%
51 to 250	25.0%
Over 250	7.1%
total	100.0%

* (temporary and permanent staff, including owners and shareholders who receive a remuneration other than that of participation in corporate bodies), Commission Recommendation of 6 May 2003.

There is also a certain balance regarding the size of the product ranges; only 6% of companies manage over 250 SKUs, about a fifth of companies have an assortment limited to up to 10 SKUs, for 39.3% the range goes from 11 to 50 references and for 32.1% goes from 51 to 250 SKUs. Of course we are talking about *SKUs* and not *products*, given that the same product can be presented in different SKUs both for net content and for brand, which is more important for companies that produce on behalf of third parties under private label, a category that affects almost 40% of companies.



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Organic products (number of SKUs)	
Up to 10	22.6%
11 to 50	39.3%
51 to 250	32.1%
Over 250	6.0%
total	100.0%

For a little less than 60% of the sample, organic production is worth more than half of the turnover (51-100%); for about a fifth of companies it accounts for 10 to 50% of total sales, for a similar share it weighs less than 10%

Share of organic (in value) on total production	
0-10%	21.4%
10-25%	8.3%
25-50%	11.9%
50-100%	58.4%
total	100.0%

Total sales (organic + non organic)	
UP TO 2 MIL EUR	46.4%
2-10 MIL EUR	14.3%
10-43 MIL EUR	25.0%
OVER 43 MIL EUR	14.3%
total	100.0%

A share of about 15% of companies only sells abroad, and 85% oversees their domestic market. Six out of 10 companies sell in other EU countries, four out of 10 sell outside the EU, almost 70% under their own brand and almost 40% under the customers' brand.

Marketing area	% of companies
National market	85.7%
EU market	59.5%
Non EU market	40.5%
Own brand production	69.0%
Production under customers' brand (private label)	39.3%

The strong propensity to export goes hand in hand with certifications.

In addition to the organic one, the certification of the HACCP system (regulation EC 852/2004) is widespread in over half of the companies, while almost 40% are IFS International Featured Standards certified, over 20% are BRC Global Standard for Food certified.

Over 15% are GMP Good Manufacturing Practices certified; ethnic and ethical certifications affect 20% of companies (kosher) and 10% (halal, vegetarian / vegan)

Other certifications	% of companies
ISO 9001 Quality management	15.5%
ISO 14001 Environmental management	9.5%
ISO 45001 Occupational health and safety management	2.4%
ISO 22000/FSSC 22000 Food safety management systems	13.1%
ISO 22005 Traceability in the feed and food chain	7.1%
ISO 31000 Risk Management	--
ISO 50001 Energy management	6.0%
HACCP	56.0%
GMP Good Manufacturing Practices	16.7%
GLOBALG.A.P.	7.1%
SQF Safe Quality Food	--
BRC Global Standard for Food Safety	22.6%
IFS International Featured Standards	39.3%
EPD Environmental performance of the product	1.2%
Kosher	20.2%
Halal	10.7%
Vegetarian/Vegan	10.7%

The high recourse to certification in compliance with ISO standards (ISO 22000, ISO 9001, ISO 22005), as well as with private standards (BRC-GSFS, IFS, GlobalG.AP...) confirms it represent a valid support for companies to reassure customers on the quality and safety of their products, as well as it testifies that in a competitive market the sole compliance to the organic regulation is not enough, given that the organic regulatory framework is focused on principle and production rules and refers to other community regulations for the general obligations of result.

The range of products handled by the companies is wide (only fish preserves are missing); the main ranges are “grains/flours/oilcakes” (over 30% of the sample), “juices, nectars and other fruit & vegetables based drinks” (25%), “fresh fruit and vegetables (including potatoes)” and “jams, marmalades, fruit spreads” (both over 20%).

Almost 12% of the companies manage gluten free products.

Organic product categories	% of companies
Grains, flour, oilcakes	31.0%
Bread and bakery	8.3%
Pasta,, rice, cous-cous, bulghur	16.7%
Flakes, puffed or extruded or roasted grains	8.3%
Dried legumes	10.7%
Vegetable oils	17.9%
tomato preserves (pureed, peeled, sauces and similar)	13.1%
other vegetable preserves (savory)	13.1%
Honey and similar	10.7%
Sugar	3.6%
ice cream, deep-frozen / frozen products	7.1%
fresh fruit and vegetables (including potatoes)	23.8%
jams, marmalades, fruit spreads	20.2%
juices, nectars and other fruit & vegetables based drinks	25.0%
ready-made tea-based drinks, infusions	3.6%
Wine, spirits	2.4%
wine or fruit vinegar	4.8%
milk, cheese, butter, yogurt and other dairy products	9.5%
vegetable milk replacement drinks (soy, oats, rice ...)	3.6%
fresh or chilled poultry and rabbit meat	3.6%
fresh or chilled beef and pork	2.4%
preserved meats (ham, salami, bacon etc)	3.6%
Fish preserves	--
chocolate and confectionery	6.0%
coffee, tea, herbal teas	14.3%
Products specifically formulated for people intolerant to gluten	11.9%

3. PROCESSING TECHNIQUES (FOR ORGANIC PRODUCTS)

For the classification of the processes we are based on the definitions of the regulation EC NO.852 / 2004. The type of processes used is obviously influenced by the product categories to which they belong, with first place those related to the milling industry, followed by chilling and maturing/drying.

No company uses pulsed electric field PEF, Microwave volumetric heating MVH nor cooking in a diesel system.

Processing techniques (for organic products)	% of companies
Shelling, milling	35.7%
Chilling	23.8%
freezing, deep freezing	16.7%
Pasteurization UHT	16.7%
high-temperature, short-time HTST	3.6%
Pascalization or high pressure processing HPP	3.6%
pulsed electric field PEF	--
Microwave volumetric heating MVH	--
Low Temperature, Short Time LTST	4.8%
Wood smoking	3.6%
maturing, drying	23.8%
alcoholic fermentation	1.2%
Non alcoholic fermentation	2.4%
marinating, salting	9.5%
extrusion	13.1%
cooking in LPG or methane gas system	4.8%
cooking in an electrical system	6.0%
cooking in a diesel system	--
cooking in a wood-fired system	2.4%
steaming	7.1%
vacuum cooking / concentration	7.1%
frying	7.1%
boiling	7.1%
roasting	9.5%
Vacuum packaging	13.1%
packaging with inert gases	10.7%

The dynamism of companies is testified by the number of those that plan the introduction of new techniques (58.3%) in the next two years.

The data must also be considered the framework of traditional productions or recipes codified by EU or national law, for which it is not always possible to introduce new techniques.

It should also be considered that the adoption of new techniques does not necessarily involve differences in the products: more simply, the company may have the intention of bringing in-house processes that are currently outsourced (for example a bakery which, instead of buying flour from a mill, intends to start its own milling activity, to increase its control over the process, as well as for economic considerations). Wherever you look at it, however, it is a sign of dynamism.

Planning of new techniques, namely	
Shelling, milling	10.7%
Chilling	4.8%
freezing, deep freezing	3.6%
Pasteurization UHT	2.4%
high-temperature, short-time HTST	1.2%
Pascalization or high pressure processing HPP	1.2%
pulsed electric field PEF	1.2%
Low Temperature, Short Time LTST	2.4%
maturing, drying	4.8%
alcoholic fermentation	1.2%
Non alcoholic fermentation	2.4%
marinating, salting	3.6%
extrusion	1.2%
cooking in LPG or methane gas system	1.2%
cooking in an electrical system	2.4%
cooking in a diesel system	--
cooking in a wood-fired system	--
steaming	1.2%
vacuum cooking / concentration	2.4%
frying	4.8%
boiling	4.8%
Baking/roasting	4.8%
Vacuum packaging	9.5%
packaging with inert gases	3.6%
% of companies planning to introduce new techniques	58.3%
% of companies not planning to introduce new techniques	41.7%

4. USE OF ADDITIVES, PROCESSING AIDS AND OTHER PRODUCTS IN ORGANIC PRODUCTION (reg. EC No 889/2008, annex VIII) *

The answers to the question about the additives used are also strongly influenced by the typology of the products made by the company: beyond the constraints imposed by the positive list in Annex VIII of EC Reg.889/2008, there are those imposed by the vertical legislation on numerous products, which often specifies the allowed additives and processing aids.

The fact that about half companies use additives and about half do not use them must be weighed with reference to the product orientation.

The use of plant extracts used for their coloring properties (as a substitute for coloring additives not allowed in organic products) catch the eyes.

The use of natural flavouring substances/preparations is even more common (26.2%); this leads us to suppose that the obligation to limit oneself to "natural ["food (s) or food category or source (s)]" included in regulation (EU) no 848/2018 may involve a modification of the recipes (or at least a modification of the ingredient list printed on the label).

And if only 2.4% of the companies declare that they use lithotamnium, it must be considered that both companies in the sample that produce vegetable drinks do.

Additives & processing aids in use	% of companies
sweetener (Erythritol)	3.6%
antioxidants	13.1%
acids	11.9%
acidity regulators	9.5%
anti-caking agents	2.4%
emulsifiers	6.0%
raising agents	4.8%
gums (guar, xanthan, arabic, gellan etc)	10.7%
packaging gases	8.3%
Sulphites in wines and fruit wines	1.2%
sodium nitrite / potassium nitrate in meat products	2.4%
vegetable extracts for coloring use **	17.9%
lithotamnium	2.4%
Natural flavouring substances, natural flavouring preparations	26.2%
starches	15.5%
pectin	14.3%
% of companies using additives, processing aids and other products	53.6%
% of companies not using any additives, processing aids and other products	46.4%

* (in the case of additives with multiple functions, the main technological function declared on the label is reported)

** (curcuma, black carrot extract, beet extract etc.)



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When asked how they think in relation to additives, more than half of the companies respond that they consider the current list sufficient.

One in five companies, on the other hand, believes that all additives of agricultural origin of organic production should be authorized, 10% believe that other additives should be authorized in any case in line with the principles established by the regulation. On the other hand, one in six companies thinks that there are already too many additives.

Regarding additives, in relation to their production specialization, companies think that

The authorized additives are sufficient	52.4%
Too many additives are authorized	16.7%
All additives obtained from organic raw material should be authorized	20.2%
Other additives in line with the principles of organic production should be authorized	10.7%

On another issue that has been debated in the past (also by the European Court of Justice, which in November 2014 ruled the prohibition of the use of minerals, vitamins, amino acids and micronutrients where not legally required), the position expressed by the companies is even more decisive: two thirds believe that their use in organic food should be authorized only if it is required by provisions of EU or national law.

Moreover, a third of the companies believe that enrichment should be allowed as well as in non-organic production.

In relation to minerals, trace elements, vitamins, amino acids and micronutrients, companies think that

It is consistent that their use in organic food is authorized only if it is required by provisions of EU law or by provisions of national law	64.3%
That their use in organic food must be generally authorized as it is in non-organic production	35.7%

5. NUTRISCORE, GREEN CLAIMS

In the last/next two years some recipes were changed (or are going to be changed) , but mostly in order to adapt to market demand, only in a small part to improve the nutritional profile of the product and with a negligible share that kept the Nutriscore in mind.

A company out of three is convinced that the current recipe is perfect and guarantees the best quality of the product and therefore will not change it, for 18.6% the recipe cannot be changed because it is codified by law or by tradition.

Change of recipes in the last two years (or planning to change in the next two years)

Yes, to get a better Nutriscore rating	2.4%
Yes, to improve the nutritional profile (less fat and / or sugar and / or salt), but this regardless of the Nutriscore	14.0%
Yes, to adapt to market demand	33.7%
No, the products are perfect as they are	31,3%
No, it is a traditional or compulsory recipe	18.6%

In relation to other claims/logos on the label, the number of companies that positively evaluate Nutriscore because it simplifies the choice by consumers is slightly higher than that which considers it unsuitable for this purpose.

Almost triple the number of companies that, beyond the nutritional efficacy, are concerned about the fact that the system does not take into account the degree of processing or additives, putting organic food at a disadvantage.

Even about an Eco-Score the position is not homogeneous. If 13% of companies are convinced that it should be introduced to assess the environmental performance of products based on the LCA, a double share finds that the LCA parameters do not consider many fundamental factors of biological production, and that other tools are needed to avoid improper classifications.

Even on the adoption of a regulation on green claims there is no consensus: 37% are in favor, but 21% fear that a “softer” intermediate classification is legitimized, with the risk of giving way to competition with organic products.

Rather than positions of principle, it seems to be dealing with strategic choices, for which a thorough evaluation of the pros and cons is necessary.

Finally, 28.6% of companies invoke regulations, valid from a certain date throughout the EU, rather than directives that member states can implement at different times and in different ways.

The reference is to Directive (EU) 2018/852 on packaging and packaging waste, which is implemented according to different calendars and according to different national provisions (e.g. the Triman system in France

	agree	disagree
The Nutri-Score serves to make it easier for consumers to choose healthier foods and should be made mandatory as soon as possible.	14.3%	11.9%
The Nutri-Score does not take into account the degree of processing, additives and substitute ingredients and risks putting organic food at a disadvantage.	36.9%	--
An Eco-Score should be introduced to assess the environmental performance of products based on the LCA	13.1%	--
An Eco-Score should not be introduced to assess the environmental performance of products based on the LCA, since the LCA parameters do not consider fundamental factors (biodiversity, soil fertility, animal welfare, rural development ...): other tools are needed	27.4%	--
A discipline of the use of "green" claims (natural, sustainable ...) on the label is desirable, to avoid abuse and greenwashing, reserving the claims for products obtained without synthetic chemicals, which by definition are not natural	36.9%	
A regulation of the use of "green" claims (natural, sustainable ...) on the label is not desirable, as they would give rise to confusion for the consumer by introducing a little sensible intermediate classification between conventional and organic	21.4%	
The different applications in the member states of Directive (EU) 2018/852 on packaging and packaging waste are a problem, we need regulations directly applicable in the EU, not individual national provisions	28.6%	
I operate only on the national market, the different applications in the member states of directive (EU) 2018/852 on packaging and packaging waste are not a problem	19.0%	

6. SOME DIFFERENCES

	GERMANY	ITALY	HUNGARY	POLAND
The authorized additives are sufficient	90.0%	68.4%	51.9%	48.1%
All additives obtained from organic raw material should be authorized	10.0%	31.6%	11.1%	29.6%
Too many additives	--	--	37.0%	14.8%
Other additives in line with the principles of organic production should be authorized	--	--	--	7.4%
It is consistent that enrichment in organic food is authorized only if it is required by provisions of EU or national law	70.0%	52.6%	40.7%	96.0%
Enrichment of organic food must be generally authorized as it is in non-organic production	30.0%	47.4%	59.3%	4.0%
Sales up to 2 mil EUR	10%	--	74.1%	74.1%
Sales 2-10 mil EUR	--	10.0%	18.5%	11.1%
Sales 10-43 mil EUR	50%	60.0%	7.4%	7.4%
Sales over 43 mil EUR	40%	30.0%	--	7.4%
Sales to EU market	80%	85%	33.3%	55.6%
Organic range 0-10 SKUs	--	--	40.7%	33.3%
Organic range 11-50 SKUs	20%	40%	33.3%	51.8%
Organic range 51-250 SKUs	60%	55%	22.2%	11.1%
Organic range over 250 SKUs	20%	5%	3.7%	3.7%

	Up to 2 mil EUR	2-10 mil EUR	10-43 mil EUR	over 43 mil EUR
The authorized additives are sufficient	53.8%	58.3%	42.9%	50.0%
All additives obtained from organic raw material should be authorized	20.5%	16.7%	47.6%	16.7%
Too many additives	23.1%	16.7%	9.5%	--
Other additives in line with the principles of organic production should be authorized	2.6%	8.3%	--	33.3%
Establishment of company (years at 31.12.2020)	22	31	42	62
Starting of organic production (years at 31.12.2020)	11	15	24	18



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7. FINAL CONSIDERATION

Even taking into account the limited sample size, a clear difference is evident between the companies that consider the current list of additives sufficient (from 90% in Germany to 48% in Poland), among those who believe that the list should include all the additives deriving from organic agricultural production (31.6% Italy, 10% Germany) and among those who believe that too many additives are already authorized (only Hungary with 37% and Poland with almost 15%, none in Germany and Italy).

When we consider the variability of the answers on this topic in relation to the size of the turnover, the differences are less evident.

The opinion that the current list is adequate goes from 42.9% (turnover from 10 to 43 mil EUR) to 58.3% (average 52.4%); with the increase in turnover, the opinion that the current list of additives is too generous decreases, while the opinion increases that other additives anyway in line with the principles of organic production should be authorized.

About the other sensitive issue of enrichment, we can note a significant difference among companies in the different countries: 96% of the Polish sample thinks the current situation (enrichment allowed only if compulsory according to the horizontal legislation) is adequate, against 40.7% of the Hungarian sample.

Specularly, 59% of the Hungarian sample and 47.4% of the Italian one would like the possibility of enriching products in compliance with horizontal legislation (therefore with the possibility of voluntarily adding nutrients) against 4% of the Polish one and 30% of the German one.

General consideration: many of the items included in the survey are regularly included in the control system routine (from basic company data to turnover, range of products etc.) or could be usefully included without leading to excess work and costs (e.g. markets, range composition and relative width and depth).

It is common experience that surveys on companies are challenging; companies are pressured by numerous tasks, including requests for information and even if the surveys are designed to take little time to complete, the feedback is not aligned with expectations.

The Commission is aware of the fundamental importance of information: several articles of the new regulation (EU) 848 / 2018 deal with information (Article 43, Article 51, Article 52, etc): for operators and policy makers it is fundamental, but not enough to have a database concerning the availability on the market of organic aquaculture juveniles.

We are in the fortunate situation that operators are already required to provide information notifying their activity to the competent authorities of the Member State; it would be enough to integrate communication with information (for example: academic qualification of operators), just as it would be enough to provide for the extraction and management of data already provided (for example gender and age of the operator), to be processed in compliance with the requirements for the protection of personal data under Regulation (EU) 2016/679.

The systematic management of the information already provided by the operators and not managed up to now is virtually at no cost.

But there is more: the control body meets the operators at least once a year, it can quickly collect information (quantity of oysters collected rather than sales to the food service or to German partners) that can be of great use for the best knowledge of the sector and for the elaboration of more tailored policies and tools.



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8. QUESTIONNAIRE FOR ORGANIC PROCESSING COMPANIES

Company data

	Please indicate
Business name	
Country	
Year of establishment of the company	
Starting year of organic production	
E-mail to receive the conclusions of the survey	

Business characteristics

Number of direct employees	Please indicate (X)
Up to 10	
11 to 50	
51 to 250	
Over 250	

(i.e. temporary and permanent staff, including owners and shareholders who receive a remuneration other than that of participation in corporate bodies)

Organic products (number of SKUs)

	Please indicate (X)
Up to 10	
11 to 50	
51 to 250	
Over 250	

Share of organic (in value) on total production

	Please indicate (X)
0-10%	
10-25%	
25-50%	
50-100%	

Total turnover (organic + non-organic) in EUR:

	Please indicate (X)
up to 2 million	
2 to 10 million	
10 to 43 million	
over 43 million	



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Marketing area

	Please indicate (X)
National market	
EU market	
Non EU market	
Own brand production	
Production under customers' brand (private label)	

Other certifications

	Please indicate (X)
ISO 9001 Quality management	
ISO 14001 Environmental management	
ISO 45001 Occupational health and safety management	
ISO 22000/FSSC 22000 Food safety management systems	
ISO 22005 Traceability in the feed and food chain	
ISO 31000 Risk Management	
ISO 50001 Energy management	
HACCP	
GMP Good Manufacturing Practices	
GLOBALG.A.P.	
SQF Safe Quality Food	
BRC Global Standard for Food Safety	
IFS International Featured Standards	
EPD Environmental performance of the product	
Kosher	
Halal	
Vegetarian/Vegan	

Organic product categories

category	
Grains, flour, oilcakes	
Bread and bakery	
Pasta,, rice, cous-cous, bulghur	
Flakes, puffed or extruded or roasted grains	
Dried legumes	
Vegetable oils	
tomato preserves (pureed, peeled, sauces and similar)	
other vegetable preserves (savory)	
Honey and similar	
Sugar	
ice cream, deep-frozen / frozen products	
fresh fruit and vegetables (including potatoes)	
jams, marmalades, fruit spreads	
juices, nectars and other fruit & vegetables based drinks	
ready-made tea-based drinks, infusions	
Wine, spirits	
wine or fruit vinegar	
milk, cheese, butter, yogurt and other dairy products	
vegetable milk replacement drinks (soy, oats, rice ...)	
fresh or chilled poultry and rabbit meat	
fresh or chilled beef and pork	
preserved meats (ham, salami, bacon etc)	
Fish preserves	
chocolate and confectionery	
coffee, tea, herbal teas	
Products specifically formulated for people intolerant to gluten	

Processing techniques (only for organic products)

	Please indicate (X)
Shelling, milling	
Chilling	
freezing, deep freezing	
Pasteurization UHT	
high-temperature, short-time HTST	
Pascalization or high pressure processing HPP	
pulsed electric field PEF	
Microwave volumetric heating MVH	
Low Temperature, Short Time LTST	
Wood smoking	
maturing, drying	
alcoholic fermentation	
Non alcoholic fermentation	
marinating, salting	
extrusion	
cooking in LPG or methane gas system	
cooking in an electrical system	
cooking in a diesel system	
cooking in a wood-fired system	
steaming	
vacuum cooking / concentration	
frying	
boiling	
roasting	
Vacuum packaging	
packaging with inert gases	

In the next two years I plan to introduce a process not used up to now in organic production, namely (indicate among those in the previous list):



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Use of additives and other substances (in organic production only)

(in the case of additives with multiple functions, refer to the main technological function declared on the label)

	Please indicate (X)
sweetener (Erythritol)	
antioxidants	
acids	
acidity regulators	
anti-caking agents	
emulsifiers	
emulsifying salts	
raising agents	
gums (guar, xanthan, arabic, gellan etc)	
packaging gases	
Sulphites in wines and fruit wines	
sodium nitrite / potassium nitrate in meat products	
vegetable extracts for coloring use (curcuma, black carrot extract, beet extract etc.)	
lithotamium	
Natural flavouring substances, natural flavouring preparations	
starches	
pectin	
NONE	

Regarding additives, in relation to my production specialization, I believe that

	Please indicate (X)
The authorized additives are sufficient	
Too many additives are authorized	
all additives obtained from organic raw material should be authorized	
Other additives in line with the principles of organic production should be authorized, namely:	



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In relation to minerals, trace elements, vitamins, amino acids and micronutrients, I believe that

	Please indicate (X)
It is consistent that their use in organic food is authorized only if it is required by provisions of EU law or by provisions of national law	
That their use in organic food must be generally authorized as it is in non-organic production	

Has the company changed in the last two years (or will it change in the next two years) the recipes of the products in its assortment?

	Please indicate (X)
Yes, to get a better Nutriscore rating	
Yes, to improve the nutritional profile (less fat and / or sugar and / or salt), but this regardless of the Nutriscore	
Yes, to adapt to market demand	
No, the products are perfect as they are	
No, it is a traditional or compulsory recipe	

Packaging material

Material	Please indicate (X)
glass GL	
Steel FE	
Aluminium ALU	
Paper, fibreboard PAP	
Wood, cork FOR	
Plastica biodegradabile/compostabile 7	
PA	
Polyethylene terephthalate PET	
High density polyethylene HDPE	
Polyvinyl chloride PVC	
Low density polyethylene LDPE	
Polypropylene PP	
Polystyrene PS	
Cotton, jute TEX	
Compound packaging with inseparable substances/materials	

	yes (x)	no (x)
In the last two years / in the next two years, has the company changed or will it change the packaging material?		



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Other labels

	yes (x)	no (x)
The Nutri-Score serves to make it easier for consumers to choose healthier foods and should be made mandatory as soon as possible.		
The Nutri-Score does not take into account the degree of processing, additives and substitute ingredients and risks putting organic food at a disadvantage.		
An Eco-Score should be introduced to assess the environmental performance of products based on the LCA		
An Eco-Score should not be introduced to assess the environmental performance of products based on the LCA, since the LCA parameters do not consider fundamental factors (biodiversity, soil fertility, animal welfare, rural development ...): other tools are needed		
A discipline of the use of "green" claims (natural, sustainable ...) on the label is desirable, to avoid abuse and greenwashing, reserving the claims for products obtained without synthetic chemicals, which by definition are not natural		
A regulation of the use of "green" claims (natural, sustainable ...) on the label is not desirable, as they would give rise to confusion for the consumer by introducing a little sensible intermediate classification between conventional and organic		
The different applications in the member states of Directive (EU) 2018/852 on packaging and packaging waste are a problem, we need regulations directly applicable in the EU, not individual national provisions		
I operate only on the national market, the different applications in the member states of directive (EU) 2018/852 on packaging and packaging waste are not a problem		

I was invited to fill in this questionnaire by the organization:

Name of the organization

9. SURVEYED COMPANIES

Agricola Grains Spa	IT	Lipiliszt Kft.	HU
Agro Select S.A.	PL	Marillen Gyümölcsfeldolgozó Kft	HU
Agrosprint Zrt.	HU	Martin Bauer GmbH & Co KG	DE
AGRO-WODZISŁAW SP. Z O.O.	PL	MIR-LEK sp. z o.o.	PL
AR Szelc sp.jawna	PL	Molini Pivetti	IT
BIO BERRY PL	PL	Molnár Biokert Kft.	HU
BIO ORGANICA Italy s.r.l.	IT	MONARI FEDERZONI S.P.A.	IT
Bioconcept Gardenia sp. z o.o.	PL	Nagy Sándor e. v.	HU
Biofaktura	HU	Naszálytej Zrt.	HU
BIOGOLD Natur Kft.	HU	Natur Gold Hungária Kft	HU
BIOItalySRL	IT	Ökoland GmbH Nord	DE
Biotövis Kft.	HU	Okręgowa Spółdzielnia Mleczarska w Jasienicy Ros.	PL
Brio spa	IT	Organic Kingdom Kft.	HU
Canova srl	IT	ORGANIKAGRO FOODS Sp. z. o.o. Sp.	PL
Camj - Società Coop. Agricola	IT	P.H. ROYAL	PL
CONAPI SOC. COOP. AGRICOLA	IT	Pasieka Pucer Dariusz i Małgorzata Pucer	PL
Csipet Land Kft.	HU	Pecznyik Béla e. v.	HU
Czupy Krisztina őstermelő	HU	Peiba Kft.	HU
Dary Nature Sp. z o.o	PL	Pipacs Pékség Kft.	HU
Deangelis srl	IT	Piszkei Óko Kft	HU
Doti sp jawna Manufaktura D.M.Mroczkowsy	PL	PIZZI OSVALDO & C. Spa	IT
Dried Plant Products	DE	Polska Róża Ernest Michalski sp. z o.o.	PL
EKOARONIA Agnieszka Chylicka	PL	Polskie Młyny Sp. z o.o.	PL
Ekologiczne Gospodarstwo Rolne Małgorzata Konieczna i Stefan Bednarek	PL	Polyák Mária őstermelő	HU
EKO-MŁYN Kazimierz jachymski	PL	Probios Spa	IT
EKOOAZA Młyny Wodne Sp. z o.o.	PL	Rack & Rütther GmbH	DE
EPMS Zrt.	HU	RÉDEI 97 Bt.	HU
F.W.Praum GmbH & Co. KG	DE	RIGONI DI ASIAGO	IT
FATTORIA SCALDASOLE SRL	IT	Rodzinne Gospodarstwo Ekologiczne FIGA Waldemar i Tomasz Maziejuk	PL
Freiland Puten Fahrenzhausen GmbH	DE	SALUS Haus GmbH & Co. KG	DE
Gino Girolomoni Cooperativa Agricola	IT	Savi Italo Srl	IT
Goodwill National Trading Kft.	HU	Spółdz.Produk.Rolnic.Ekolog. DOLINA MOGILNICY	PL
Gospodarstwo Pasieczne Sądecki Bartnik Sp. z o.o.	PL	Starch production	DE
Gyukli Pince	HU	STOWARZYSZENIE SADY GRÓJECKIE	PL
Helóta Biokert	HU	Szatmári-Ízek Kft.	HU
Horváth László őstermelő	HU	Terrasana	NL
I TESORI DELLA TERRA	IT	The Bridge srl	IT
InnFood GmbH	DE	Töpfer GmbH	DE
JK sp .z o.o.	PL	Valaha Tanya	HU
Korab Garden sp. z o.o.	PL	Wytwórnia Makaronu Bio	PL
La Cesenate Conserve Alimentari Spa	IT	Ziegler Kft	HU
LaSelva società bioagricola a r.l.	IT	Złoto Polskie -Family Business s.c.	PL

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