

Additional criteria for multi ingredient and or complex processed products.

Number	Criteria
1.	Number, type and degree of processing of ingredients used
	Rational; Ingredients used for products are often pre-processed. Sometimes the products are highly isolated or was going to intensive treatment by different processing technologies. To reflect on the technological history and the technological and nutritional properties of the different ingredients used is therefore relevant for better understanding of nutritional quality and “naturalness” of the final product.
	Possible Indicators – some examples: <ul style="list-style-type: none"> • Number of highly isolated (1) ingredients used • Relation of whole some (2) ingredients and isolated ingredients • <p>(1) For example, isolation degree above 95% - saccharose, starch types, glucose sirup</p> <p>(2) Definition Kollath...</p>
2.	Number, types and functionality of additives and processing aids used
	Rational; Additive and Processing aids are used for technical purposes in a food product. Those substances can have a massive influence on quality characteristics and composition of the product produced. Further on those products are often products not normally consumed as food and coming from chemical synthesis or biotechnology. To study the number and type of those technical substances used and their effects on the food quality can be important for qualifying nutritional quality.
	Possible Indicators – some examples: <ul style="list-style-type: none"> • Number of additives and processing aids used • Number of synthetic additives and p.a. used • Number of additives and p.a. from biotechnology used • (Additives and p.a. were consumer concerns are observed (1)) • ... • ... <p>(1) Reference consumer platform XZ.. (May be not fitting)</p>
3.	Number and type of substances with impact on sensorial properties
	Rational;

	Colours and flavourings used in food processing are partly complex composed and high processed products. Further on those substances have potential to mislead the consumers on the true nature of the product. Not a least they have capacity to contradict toward naturalness and or originality. *
	<p>Possible indicators – some examples:</p> <ul style="list-style-type: none"> • Number of added flavourings in the product • Number natural flavourings (Art. 16 2-6)(1) • Colouring substance's used • Impact of flavouring used for the overall taste of the product /Do flavourings dominate the flavour of the final product (2) • <p>(1) In accordance to flavouring regulation/ may be look for 16 5 and 6.... (2) Product taste like XX but the row material XX is not in and the impression is of XX is provided by a flavouring</p>
4.	Type and number of processing methods applied
	<p>Rational:</p> <p>For a complex food product mostly a number of different processing methods are applied with the overall product technology. The type and the intensity of the methods used and their impact on the characteristics of row material and the final products produced can be very different. Some of them will have deep influence on the composition and structure of the row materials used and will be thereof very relevant for characteristics of the final product and its sensorial and nutrition quality.</p>
	<p>Possible indicators – some example:</p> <ul style="list-style-type: none"> • Use of Ion exchange or absorbance technics (molecular filters) (yes/ no) • Multiple heat application to the product (Sum heat load /F value reached) • Relation of high processed ingredients to low processed ingredients • Application of high risk or not well proven technologies (nano particles, cold plasma..) •
5.	Overall composition of final product in regard to healthy nutrition requirements**
	<p>Rational;</p> <p>Overall composition of products is very important for the nutritional quality. Especially for complex composed products the final composition of nutrients needs to be compared to healthy nutrition requirements. Doing so is giving a important qualification for nutrition quality of the product.</p>
	<p>Possible indicators – some example:</p> <ul style="list-style-type: none"> • Sum of mono and di saccharides in the final product • Sum saturated fatty acids • Sum of fat • Sum of salt • Sum dietary fibres • Nutrients density of the final product • .. • ..

6.

*Art 19 (3) of organic regulation.

3. Substances and techniques that reconstitute properties that are lost in the processing and storage of organic food, that correct the results of negligence in the processing of these products or that otherwise may be misleading as to the true nature of these products shall not be used.

** I think complex foods needs to be here different understood than for example mono products. A ham will be always staying a very protein rich food, or a honey will be always very sugar rich. This is typical for the natural properties of such products.

Mixed product like for example a breakfast cereal can be composed in a way that the final sugar content is too high. This need to be judged different from for example honey. This criteria try to address those circumstances.

But you even see it as sup floss because it is already covered by the annex table for criteria in the already existing in the draft AF.