

USE IN ORGANIC BEER PRODUCTION OF LALLEMAND PRODUCTS - SERVOMYCES® L50, ABV YEASTLIFE EXTRA and ABV YEASTLIFE O

To whom this may concern,

We are providing for the benefit of our clients and or stakeholders guidance with regards to EU Organic Production rules on the use of the above referenced Lallemand products in beer production.

Preparations of micro-organisms (such as Servomyces L50 and ABV YeastLife O) are allowed for use in organic beer production and are not required to be calculated as agricultural products (see attached annex for the necessary supporting regulatory interpretation). ABV YeastLife Extra is used as a processing aid in beer production.

These products (containing ingredients also allowed for use in certain other organic products and or organic processing) are to be used bearing in mind the general principles of organic production. (Please note that there are currently no EU and or national organic production rules on processing aids used in beer production).

Finally, we can also confirm that none of the ingredients¹ in both products contain, consists and or are produced from genetically modified organism(s).

LALLEMAND BREWING

July 7, 2021

¹ These include vitamins and trace elements allowed in the EU for use in baby and adult food.

USE OF YEAST (MICRO-ORGANISMS) PREPARATIONS

Regulation (EU) 2018/848 sets out measures concerning **production rules for processed food**. This is in Article 16 and Article 16.1 requires that processed foods **“shall comply, in particular, with the detailed production rules set out in Part IV of Annex II”** and in any other adopted implementing acts including on the techniques for food processing.

Part IV of Annex II and in particular point 2.2.2 (Regulation (EU) 2018/848) states that: **“In the processing of food, the following products and substances may be used: (a) preparations of micro-organisms and food enzymes normally used in food processing, provided that food enzymes to be used as food additives have been authorised pursuant to Article 24 for use in organic production;**”

In the preparation of beer, yeast (preparation) is normally used for the fermentation of the substrate (barley, oat, etc.). This use as an ingredient is in line with **point 2.2.2 of part IV in Annex II of Regulation (EU) 2018/848** (cited in Article 16 and reproduced above) and therefore measures as laid out in article 19 (a specific measure that applies to **“Production rules for yeast used as food or feed”**) do not apply.

CALCULATION OF AGRICULTURAL PRODUCTS

Point 2.2.4 of Part IV of Annex II (Regulation (EU) 2018/848) also provides rules for the calculation of agricultural ingredients. It states (in 2.2.4(b)): that **“preparations and substances referred to in points (a)”** (preparations of micro-organisms), **“(c), (d), (e) and (f)² of point 2.2.2 shall not be calculated as agricultural ingredients....”**

Regulatory and Compliance, Lallemand Brewing

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- 2 (c) **colours** for stamping meat and eggshells in accordance with Article 17 of Regulation (EC) No 1333/2008;
- (d) **natural colours** and **natural coating substances** for the traditional decorative colouring of the shell of boiled eggs produced with the intention of placing them on the market at a given period of the year;
- (e) **drinking water** and **organic or non-organic salt** (with sodium chloride or potassium chloride as basic components) generally used in food processing;
- (f) **minerals (trace elements included), vitamins, amino acids** and **micronutrients**, provided that:
- (i) their use in food for normal consumption is ‘directly legally required’, in the meaning of being directly required by provisions of Union law or provisions of national law compatible with Union law, with the consequence that the food cannot be placed at all on the market as food for normal consumption if those minerals, vitamins, amino acids or micronutrients are not added; or
- (ii) as regards food placed on the market as having particular characteristics or effects in relation to health or nutrition or in relation to needs of specific groups of consumers:
- in products referred to in points (a) and (b) of Article 1(1) of Regulation (EU) No 609/2013 of the European Parliament and of the Council their use is authorised by that Regulation and acts adopted on the basis of Article 11(1) of that Regulation for the products concerned, or
 - in products regulated by Commission Directive 2006/125/EC, their use is authorised by that Directive.