

SEASALT Europe's CONTRIBUTION

Draft Regulation governing the use of the certification mark for Sustainable Agricultural Production, which includes the technical standards to be promoted in sustainable agricultural production

17th January 2025

*SEASALT Europe*¹ is the *European Sea Salt Works Association* that represents the interests of the **sea salt** producers before European institutions. Our mission is to promote recognition, quality, and sustainability of European **sea salt**, sourced from the sea through evaporation exclusively driven by wind and sun.

SEASALT Europe was founded in response to the need for unity among European **sea salt** producers. Our mission is rooted in four fundamental pillars: raising awareness of the unique characteristics of European sea salt, advocating for sustainable production practices, preserving and promoting its rich cultural heritage, and actively working towards a sustainable future for the European sea salt sector.

European **sea salt** marshes, while numerous, are predominantly small, family-owned businesses. This places them at a disadvantage, receiving less support from European policies and making it difficult to compete in the global market. Our aim is to work towards a change in European policies that recognizes the cultural, environmental, and economic importance of **sea salt**, thereby safeguarding an invaluable heritage for generations to come.

Regarding the *draft² Regulation governing the use of the certification mark for Sustainable Agricultural Production, which includes the technical standards to be promoted in sustainable agricultural production*, *SEASALT Europe* would like to make the following observations:

- Regarding point 4.1 of the *Draft Regulation on the use of the Sustainable Agricultural Production (PAS) certification mark*, we note that while the current definition of **primary production** aligns with *Regulations (EC) 178/2002*³ and *852/2004*⁴, it presents a significant omission for our sector.

These Regulations define **primary production** as the set of activities ranging from initial production to harvesting or gathering, including animal husbandry. However, the activities covered by this *Draft* do not include the primary production of sea salt, understood as the extraction of salt from natural sources, as well as subsequent storage and packaging at the producer's facilities, and its transportation to another establishment.

- It is also important to note that *sea salt and other salts for food and feed*, are included within the scope of *Regulation EU 848/2018*⁵ and, as of January 1, 2022, can be certified as organic.

Furthermore, Spain is a significant producer of sea salt, and many Spanish sea salt producers already hold official organic production certificates (Euroleaf) accessible on Traces⁶.

In light of the foregoing, the exclusion of sea salt production from the scope of the PAS certification mark presents a significant concern. Sea salt production, involving the extraction of a natural resource, undeniably constitutes a primary agricultural activity. Its exclusion creates an unjustified disparity compared to other primary agricultural productions, potentially generating a competitive disadvantage for sea salt producers.

Therefore, we respectfully request that the Commission favourably consider the inclusion of **primary sea salt production** within the scope of the Sustainable Agricultural Production certification mark. This inclusion would ensure equitable treatment for all primary agricultural producers and contribute to the overall sustainability of the food system.

We thank you for your attention to this matter and remain at your disposal for any further clarification or information you may require.

¹ <https://seasalteurope.com/>

² <https://technical-regulation-information-system.ec.europa.eu/en/notification/26503>

³ Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety

⁴ Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs

⁵ Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007

⁶ [TRACES - European Commission](#)