



Organic Food Federation

Definition of Processed Products

Organic regulation 889/2008 and EC 848/2018 defines 'processing' as meaning: *'any action referred to in point (m) of Article 2(1) of Regulation (EC) No 852/2004, including the use of substances referred to in Article 19(2)(b) of Regulation (EC) No 834/2007. Packaging or labelling operations shall not be considered as processing.'*

' Article 2(1) of 852/2004: Article 2(m): *"processing" means any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes.*

Unprocessed products are referred to in Article 2(n) of 852/2004: *"unprocessed products" means foodstuffs that have not undergone processing, and includes products that have been divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen or thawed.*

This means the following activities would be classed as unprocessed:

- Product imported as already finished retail packed product
- Unaltered raw ingredients
- Packing or labelling, e.g. fresh produce, herbs & spices, nuts, dried goods, , re-packing of oils or liquids
- Product that is washed, trimmed or frozen

The following activities would be classed as processed:

- Deodorising oil (involves heating so can be considered processed)
- Anything where product is heated, dried, cooked, roasted or smoked e.g. would include packing of imported honey where honey is heated
- Curing
- Maturing
- Marinating
- Encapsulating
- Extraction, e.g. producing oils from seeds or nuts; extraction of coffee for the production of soluble coffee; decaffeination of tea/coffee; extraction of essential oils
- Extrusion
- Pasteurisation
- Pickling
- Blending e.g. herbs, spices, tea • Mixing ingredients together
- Processing of flour
- Food products which have ingredients added as permitted under article 27 of 889/2008 (in the EU regulation 2021/1165): Additives; microorganism and enzymes; natural flavours; legally required vitamins and minerals; drinking water & salt. e.g. Tea with flavourings added • Ripening of bananas
- Packing tea into teabags