

## Section 11

# Operational Requirements for Organic Processing Operations

### (including Cleaning and Pest Control)

## 11.0 Contents Page

This Section explains the operating general procedures, which must be implemented by a registered processor. These procedures are designed to ensure that the organic integrity of products is safeguarded during processing, storage and transport.

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3	31/10/2006	12,13,14,17	G Lanceley	R Jacobs (Chief Executive)

## 11.1 Organic Processing Standards - Overview

**OF&G Standards are based, as required by law, on the Defra Compendium of Organic Standards.**

**The OF&G Standard is given at the beginning of each section, followed by the Defra regulation (with compendium reference) and guidance where required.**

11.1.01 OF&G STD	<p>The OF&amp;G Standards for organic processing ensure the organic integrity of the product throughout the processing operation.</p> <p>The main requirements for organic processing operations are as follows:-</p> <ol style="list-style-type: none"> <li>1) <u>Statutory Legislation and Good Practice</u> – organic regulations do not override statutory legislation, they are in addition to it. Each processing operation must be registered with the appropriate statutory authority (eg Defra, EHO, MHIS) and comply with all relevant statutory regulations and good practice;</li> <li>2) <u>Composition</u> – non-organic ingredients and additives may be used as long as they are from the Approved Lists in this Control Manual. GMOs or ingredients derived from them are not allowed;</li> <li>3) <u>Organic status</u> - there must be proof of organic status for all organic ingredients used;</li> <li>4) <u>Segregation and HACCP</u> - organic ingredients must be clearly identified and segregated from conventional products during:             <ol style="list-style-type: none"> <li>a) Intake;</li> <li>b) Storage;</li> <li>c) Processing and Packing;</li> <li>d) Transport</li> <li>e) Display in open packaging (sealed and labelled packaging does not need to be kept separate);</li> </ol> <p>A hazard analysis (HACCP) should be done to identify points in the process at which contamination may occur;</p> </li> <li>5) <u>Cleaning</u> - cleaning chemicals, procedures and standards should be appropriate to the industry. If wet cleans are done, they must be followed by a final water rinse to remove traces of any cleaning chemicals;</li> <li>6) <u>Pest Control</u> - procedures should be appropriate to the industry and trained personnel used. Licensed rodent baits are allowed but spraying of any kind is strictly controlled;</li> <li>7) <u>Records for Traceability and Mass Balance</u> – appropriate controls must be in place and adequate records kept, so that it is possible to trace all ingredients used, from intake through to the final products and to compare quantities of organic ingredients used with quantities of finished products made;</li> <li>8) <u>Training</u> - staff must be trained to understand the organic requirements;</li> <li>9) <u>Processes</u> – must be approved. Certain processes such as solvent extraction, or use of ionising radiation are not permitted;</li> <li>10) <u>Packaging</u> – recyclable or biodegradable packaging is preferred where possible;</li> <li>11) <u>Labels and Marketing Literature</u> – there are very specific labelling rules for organic products. All labels and marketing literature must be approved by OF&amp;G at the proof stage;</li> <li>12) <u>Effluent Control</u> – the operation should not have an adverse effect on the environment.</li> </ol>
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## 11.2 Statutory Legislation and Good Practice

11.2.01 OF&G STD	<p><u>Statutory Legislation</u> – organic regulations do not override other statutory legislation, they are in addition to it. Each organic processing operation must be registered with the appropriate statutory authority and comply with all relevant statutory regulations and codes of good practice.</p> <p>Inspection reports, recommendations, discharge licenses etc from Statutory Authorities must be made available to OF&amp;G if requested.</p>
11.2.02 OF&G GN	<p>The Food Safety Act 1990 applies to everyone involved in the processing, packing, preparation or sale of food. It is an offence to sell food that is injurious to health, unfit or contaminated.</p> <p>There are statutory requirements in regard to premises, equipment, the facilities that must be provided, general hygiene, composition, labelling and precautions that must be taken to protect food from contamination or deterioration.</p>
11.2.03 OF&G GN	<p>Relevant statutory authorities include the following:</p> <p>Food Processing: Environmental Health.</p> <p>Abattoir or Meat Cutting: Meat Hygiene Inspection Service (MHIS).</p> <p>Egg packing, animal feed processing, seed cleaning and packing, food or feed imports: DEFRA.</p> <p>Most operations will have an annual inspection by Trading Standards to check scales, weighbridges, labelling etc.</p> <p>Note: Employers also have responsibility for the health and safety of their employees.</p>
11.2.04 DEFRA STD	<p>(Provision 3) These Standards shall apply without prejudice to other Community provisions or national provisions, in conformity with Community law, concerning products specified in Provision 1*, such as provisions governing the production, preparation, marketing, labelling and inspection, including legislation in foodstuffs and animal nutrition. (*This refers to processed and unprocessed organic agricultural products and feedstuffs.)</p>
11.2.05 DEFRA GN	<p>(Provision 3 GN) General legal requirements set out in Community legislation, or in national legislation (where this conforms to Community law) shall apply to goods produced to these Standards. For example, organic products can only be placed on the market as far as they satisfy all legally stipulated food safety requirements which also apply to corresponding products from conventional production.</p>
11.2.06 DEFRA GN	<p>(Annex III B 1 GN) Preparation establishments must conform to all relevant statutory requirements in regard to animal welfare, transport of livestock, premises, equipment, the facilities that must be provided, general hygiene and the precautions that must be taken to protect food from contamination or deterioration.</p> <p>Codes of practice on animal welfare, transport of livestock and hygiene, issued by either Defra or the Rural Affairs Departments in Scotland, Wales or Northern Ireland must be complied with.</p>
11.2.07 DEFRA STD	<p>(Annex III 10.2) When requested by the inspection body or authority, the operator shall submit the results of its own voluntary inspection and sampling programmes.</p>

## 11.2 Statutory Legislation and Good Practice - continued

### Good Practice

11.2.08 OF&G STD	<ul style="list-style-type: none"> <li>i) The site should be suitable for the enterprise;</li> <li>ii) The fabric and equipment in intake, processing, packing, storage and despatch areas should be fit for purpose and kept clean and in good condition so as not to contaminate the product;</li> <li>iii) The organisational structure should clearly define job descriptions, responsibilities and reporting relationships;</li> <li>iv) Staff facilities, work wear and rules on personal hygiene should be appropriate so as to minimise the risk of product contamination;</li> <li>v) Process controls (eg weight, temperature, time, foreign body) should be effective and measuring equipment should be calibrated to external standards;</li> <li>vi) Testing should be done to ensure product safety and conformity, Where external labs are used, they should be accredited by UKAS or equivalent;</li> <li>vii) Stock rotation procedures should ensure that ingredients are used in the correct order and within shelf-life;</li> <li>viii) Non-conforming products – procedures should be in place to ensure these are identified and quarantined then further treated as appropriate;</li> <li>ix) Product recall – a procedure should be in place and tested periodically, to ensure that all affected products can be identified and recovered;</li> <li>x) Complaints – there should be a procedure to ensure these are documented, resolved and appropriate corrective action taken;</li> <li>xi) Visitors – site entry should be controlled to prevent the possibility of product contamination by outsiders.</li> </ul>
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## 11.3 Composition and Genetic Modification

**Standards and Guidance Notes on the composition and labelling of organic products are given in Section 4.1. Information about permitted additives, processing aids and non-organic ingredients are given in Section 10. The notes below give a brief summary.**

11.3.01 OF&G STD	<ul style="list-style-type: none"> <li>i) Ingredients (including additives) and processing aids may only be used in the production of organic products if they are organic or if they appear on the approved lists in this Control Manual;</li> <li>ii) See Section 10 (foods for human consumption), Section 8.4 (animal feed) and Section 7.7 (seeds) for details of permitted non-organic ingredients, additives and processing aids;</li> <li>iii) A Multi-Ingredient Product Specification sheet must be completed for each product with more than one ingredient. Record Sheet 42 (for food products) or 43 (for animal feed) may be used as proformas. Single ingredient products should be listed on Record Sheet 41. (Copies of these Record sheets are in Section 14 of this Manual)</li> <li>iv) These record sheets must be submitted to the certification office for approval <u>before</u> the products are marketed.</li> </ul>
11.3.02 OF&G GN	In rare circumstances, it may be possible to get a derogation from Defra to use agricultural ingredients that are not on the permitted lists. (See Section 10.5.04).

**11.3 Composition and Genetic Modification - continued**

11.3.03 OF&G GN	<p><u>Genetic Modification</u>: Organic materials are, by definition, non-genetically modified (non-GM). A statement is required from Suppliers of relevant non-organic agricultural products, additives and processing aids to confirm that they are not GM or GM-derivatives. (This applies particularly to maize, soya, rape, citric acid, enzymes, microbial products) <u>This confirmation should be renewed at least annually.</u></p> <p>(OF&amp;G Record Sheet 53 may be used.) See sections 10.2 and 5.6 for further information on GM. Section 5.6 includes information on due diligence requirements for GMOs.</p>
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**11.4 Authentication of Organic Goods Received**

11.4.01 OF&G STD	<p><u>Proof of organic status</u> - operators must keep a copy of each supplier's organic certificate (ie Certificate of Compliance to EC2092/91):</p> <ul style="list-style-type: none"> <li>i) The certificate must be issued by an EC-approved organic certification body, must be valid at the date the goods were supplied, must list the goods supplied and the trading name and address of the supplier;</li> <li>ii) However, where small amounts of organic ingredients are bought retail, it may be impractical to demand a certificate. In this case the pack label may be regarded as sufficient proof of organic status;</li> <li>iii) If there is any doubt about the organic status of goods, they should not be further processed, packed or labelled as organic.</li> </ul>
11.4.02 DEFRA STD	<p>(Annex III 9.1) Where an operator considers or suspects that a product which he/she has produced, prepared, imported or had delivered from another operator, is not in compliance with this Standard, he/she shall initiate procedures either to withdraw from this product any reference to the organic production method or to separate and identify the product. He/she may only put it into processing or packaging or on the market after elimination of that doubt, unless it is placed on the market without indication referring to the organic production method. In case of such doubt, the operator shall immediately inform the inspection body. The inspection body may require that the product cannot be placed on the market with indications referring to the organic production method until it is satisfied, by the information received from the operator or from other sources, that the doubt has been eliminated.</p> <p>Where an inspection body or authority has a substantiated suspicion that an operator intends to place on the market a product not in compliance with this Regulation but bearing a reference to the organic production method, this inspection body or authority can require that the operator may provisionally not market the product with this reference. This decision shall be supplemented by the obligation to withdraw from this product any reference to the organic production method if the inspection body or authority is sure that the product does not fulfil the requirements of this Regulation. However if the suspicion is not confirmed, the above decision shall be cancelled not later than the time period specified by the inspection body. The operator shall co-operate fully with the inspection body in resolving the suspicion.</p>
11.4.03 OF&G GN	Trading Standards Officers have the authority to enforce the above.

## 11.5 Segregation and HACCP

11.5.01 OF&G STD	<ul style="list-style-type: none"> <li>i) Ideally the intake, storage, processing and packing areas should be dedicated to organic production;</li> <li>ii) If not, there should be clear, well-understood written procedures to keep organic/certified products separate from conventional products (including GM products and cleaning or pest control chemicals) throughout the process. There should be checklists to ensure procedures have been complied with. Organic integrity must be preserved at all times. Equipment must be clean. Containers, silos, packs etc must be securely closed and clearly labelled;</li> <li>iii) There should be a flow diagram to demonstrate the process and factory plan to show the layout.</li> </ul>
11.5.02 OF&G STD	<p><b>HACCP:</b> UK statutory legislation requires that all food and feed manufacturers carry out a hazard analysis of their process to determine whether there are any potential hazards to food safety. They must then set up a system to identify critical control points (points at which the hazard can be controlled) and monitoring systems to ensure this is done. This process is called a HACCP analysis (Hazard Analysis and Critical Control Points).</p> <p>Organic processors must, in addition, carry out a HACCP analysis to determine if there are any parts of their enterprise at which there could be contamination of organic products or ingredients and put in controls to prevent this happening.</p>
11.5.03 DEFRA STD	<p>(Annex III Specific Provisions E.1.2) The measures to be taken by operators to guarantee compliance with these Standards must include:</p> <ul style="list-style-type: none"> <li>i) In particular an indication of the precautionary measures to be taken in order to reduce the risk of contamination by unauthorised substances or products, the cleaning measures implemented and the monitoring of their effectiveness;</li> <li>ii) Identification of all elements of their activities crucial for guaranteeing at all times that the products referred to in Provision 1(1)c prepared in such units comply with these standards and with the Regulation (EC) No.223/2003;</li> <li>iii) The establishment and implementation of, compliance with and updating of appropriate procedures, based on the principles of the HACCP (Hazard Analysis and Critical Control Points) system.</li> </ul>
11.5.04 DEFRA GN	<p>(Annex III B.1 GN) Effective procedures and practices, supported by effective documented control systems and records, must be established and maintained to ensure that throughout the production cycle organically produced products are kept completely separate from non-organic products.</p>

### a. Segregation during Goods Intake

11.5.05 OF&G STD	<p>Effective records should be kept to record the origin, nature and quantity of organic products delivered to the unit.</p> <p>There should be proof of organic status for each item (see paragraph 11.4.01).</p>
11.5.06 OF&G STD	<p><u>Intake checks:</u></p> <ul style="list-style-type: none"> <li>i) Checks should be made that goods are securely packaged, labelled 'organic' and bear the symbol or mark of the responsible certification body. These checks should be recorded (OF&amp;G Record Sheet 44 may be used);</li> <li>ii) In the case of bulk deliveries, where there is no product packaging, the UK number (identifying the Supplier's Organic Certification Body) should be on the delivery notes and/or invoice;</li> </ul>

**11.5 Segregation and HACCP - continued**

11.5.06 cont. OF&G STD	<ul style="list-style-type: none"> <li>iii) An intake procedure should be written and relevant staff trained to become familiar with organic labelling. (The UK certification bodies are listed in Section 4.2 of this Manual). Details of certification bodies from the EU and Third Countries can be obtained from the certification office);</li> <li>iv) All documentation (purchase orders, delivery notes, invoices as relevant) should state that the goods required are organic.</li> </ul>
11.5.07 DEFRA STD	(Annex III B 5.1) On receipt of a product as referred to in Provision 1(1) (paragraph 5.1.01) ( <i>i.e. labelled organic</i> ), the operator shall check the closing of the packaging or container where it is required and the presence of the indications referred to in paragraph 7 of the General Provisions of this Annex (Section 4.2 and paragraphs 11.5.18 and 11.5.19). The operator shall crosscheck the information on the label referred to in paragraph 7 of the General Provisions with the information on the accompanying documents. The result of these verifications shall be explicitly mentioned in the documentary accounts referred to in paragraph 6 of the General Provisions (paragraph 11.8.04).

**b. Segregation during Storage**

11.5.08 OF&G STD	All organic goods, whether raw materials, work-in-progress or finished products, must be stored so there is no possibility of them being contaminated in any way by conventional products or chemicals of any sort, including cleaning or pest control chemicals. Containers, including bulk bins, silos and pallets, should be closed securely and clearly labelled. Ideally these goods will be stored in designated areas or sealed securely and stretch-wrapped on pallets.
11.5.09 DEFRA STD	(Annex III 8.1) For the storage of products, areas must be managed in order to ensure identification of lots and to avoid any mixing with or contamination by products and/or substances not in compliance with EC2092/91 ( <i>as specified in the requirements of this Control Manual</i> )

**c. Segregation during Processing and Packing**

11.5.10 OF&G STD	<ul style="list-style-type: none"> <li>i) Ideally, equipment should be dedicated to organic production. Where this is not so, to prevent contamination, processing of organic materials should take place as the first operation of the day or following a clean down or a bleed run;</li> <li>ii) The simultaneous processing or packing of organic and non-organic products on the same line, is not permitted;</li> <li>iii) Bleed Runs: if equipment cannot be taken apart for thorough cleaning before organic production starts and cleaning in place (CIP) is not possible, a suitable product must be passed through the equipment to purge it of any non-approved, gm or medicated material (this is called a bleed run.) The operator needs to justify the type and amount of bleed material used. Material from bleed runs must not be returned to organic raw material stores or used in organic finished products;</li> <li>iv) The operation should ideally be completed without interruption. Where this is not possible (eg meat brining, cheese maturing), the process must be carefully controlled to prevent contamination of the organic products;</li> <li>v) In each case above, there should be written procedures and checklists to ensure the process is controlled and recorded.</li> </ul>
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## 11.5 Segregation and HACCP - continued

11.5.11 DEFRA STD	(Annex III B.3.1) Where products not referred to in Section 4.1 ( <i>ie non-organic products</i> ) are also prepared, packaged or stored in the preparation unit concerned: <ul style="list-style-type: none"> <li>i) The unit must have areas separated by place or time within the premises for the storage of products as referred to in Section 4.1, before and after the operations;</li> <li>ii) Operations must be carried out continuously until the complete run has been dealt with, separated by place or time from similar operations performed on products not covered by Section 4.1;</li> <li>iii) If such operations are not carried out at regular times or on a fixed day, they must be announced in advance, with a deadline agreed on with the inspection body or authority;</li> <li>iv) Every measure must be taken to ensure identification of lots and to avoid mixtures or exchanges with products not obtained in accordance with the rules laid down in this Control Manual;</li> <li>v) Operations on products in accordance with the rules laid down in this Control Manual must be carried out only after cleaning of the production equipment. The effectiveness of the cleaning measures must be checked and recorded.</li> </ul>
11.5.12 DEFRA GN	(Annex III B.1 GN) Where non-organically produced products are also processed, packaged or stored in the unit concerned: <ul style="list-style-type: none"> <li>i) Effective procedures and practices, supported by effective documented control systems and records, must be established and maintained to ensure that throughout the production cycle organically produced products are kept completely separate from non-organic products;</li> <li>ii) Operations must be separated by time from similar operations performed on non-organic products. Prior to use for organic production the plant and equipment used, particularly product contact surfaces, must be effectively cleaned. The plant and equipment must be inspected prior to use to ensure that it is clean and free from residues that may contaminate or impair the organic integrity of the products.</li> </ul>
11.5.13 OF&G GN	<u>Approved materials for bleed runs are:</u> potable water, organic products or products from the approved lists in Section 10 of this Manual (for food) or from Section 8 (for animal feed).  For animal feed and seed mixes, it's often preferable to make sure the batch that goes through the plant before a batch of organic or approved feed or seeds, contains only approved ingredients, there may then be no need for a bleed run.
11.5.14 OF&G GN	<u>Contamination Checks:</u> Carry-over checks should be in place to ensure there is no contamination from medicated products, GM-products, etc. There should be proof that these checks are effective (eg Royal Pharmaceutical Society test results)
11.5.15 OF&G GN	Non-organically produced products may be processed, packaged or stored in the unit concerned subject to the provisions of paragraphs 11.5.10 to 11.5.14 being observed.

## 11.5 Segregation and HACCP - continued

## d. Segregation during Transport

11.5.16 OF&G STD	<ul style="list-style-type: none"> <li>i) Fully wrapped materials may be transported in wagons cleaned to industry-standard without further conditions;</li> <li>ii) Bulk wagons or containers must be thoroughly cleaned and checked before being loaded with organic products;</li> <li>iii) For dry goods (eg grains) dry cleaning (brushing/vacuuming) may be adequate if the previous load was non-GM/non-medicated and not on the UKASTA (now AIC) Sensitive List (Ref: www.agindustries.org.uk);</li> <li>iv) Otherwise wet cleans using detergents and/or steam should be done. (All cleaning chemicals should be rinsed off with potable water before organic goods are loaded);</li> <li>v) Note: Wagons that have carried materials on the AIC Exclusion List (eg radioactive material) must not be used to transport organic products;</li> <li>vi) Before organic products are loaded onto bulk wagons, details of the 3 previous loads should be checked to ensure they are not on the AIC Haulage Exclusion List, or, if they are on the AIC Sensitive List, that they have been appropriately cleaned;</li> <li>vii) Wagons for un-wrapped chilled products (eg meat) should be cleaned using appropriate detergent/sanitiser then rinsed with potable water before loading;</li> <li>viii) Accompanying documentation must clearly describe the goods and their organic status.</li> </ul>
11.5.17 DEFRA STD	<p>(Annex III B.4.1) Milk, eggs and egg-products from organic farming shall be collected independently from products not produced in accordance with this Control Manual.</p> <p>By derogation, and subject to the prior approval by the inspection body or authority, simultaneous collection may occur, where appropriate measures are taken to prevent any possible mixture or exchange with products not produced in accordance with this Regulation and to ensure the identification of the products produced in accordance with the provisions of this Control Manual. The operator must keep the information relating to collection days, hours, circuit and date and time of reception of the products available to the inspection body or authority.</p>
11.5.18 DEFRA STD	<p>(Annex III 7.1) The operators shall ensure that products as referred to in Provision 1 (paragraph 5.1.01) (<i>i.e. organic products</i>) may be transported to other units, including wholesalers and retailers, only in appropriate packaging, containers or vehicles closed in such a manner that substitution of the content cannot be achieved without manipulation or damage of the seal and provided with a label stating, without prejudice to any other indications required by law:</p> <ul style="list-style-type: none"> <li>a) The name and address of the operator and, where different, of the owner or seller of the product;</li> <li>b) The name of the product, including a reference to the organic production method, in accordance with Section 4.1;</li> <li>c) The name and/or the code number of the inspection body or authority to which the operator is subject; and</li> <li>d) Where relevant, the lot identification mark according to a marking system either approved at national level and or agreed with the inspection body or authority and which permits to link the lot with the accounts referred to in Section 11.8.</li> </ul>

**11.5 Segregation and HACCP - continued**

11.5.19 DEFRA STD	(Annex III 7.2) The information under a, b, c and d above can also be presented on an accompanying document, if such document can be undeniably linked with the packaging, container or vehicle of the product. This accompanying document shall include information on the supplier and/or the transporter.
11.5.20 DEFRA STD	(Annex III 7.3) However, the closing of packaging, containers or vehicles is not required where: <ul style="list-style-type: none"> <li>i) Transportation is direct between a producer and another operator who are both subject to the inspection system referred to in Provision 9 (OF&amp;G CM Section 5); and</li> <li>ii) The products are accompanied by a document giving the information required under the previous subparagraph; and</li> <li>iii) The inspection body or authority of both the expediting and the receiving operators have been informed of such transport operations and have agreed thereto. Such agreement might be provided for one or more transport operation(s).</li> </ul>

**11.6 Cleaning**

11.6.01 OF&G STD	CLEANING STANDARDS: The level of cleaning should comply with industry standards and should prevent microbial, chemical or foreign body contamination of the products. All product contact surfaces including utensils should be cleaned before organic production starts.
11.6.02 OF&G STD	CHEMICALS: Industry-approved detergents and/or sanitisers may be used, however there <u>must be a final rinse with potable water</u> before production starts, to remove any trace of chemicals. (A disinfectant such as alcohol may be used only if 100% evaporation, leaving no residue, can be ensured).
11.6.03 OF&G STD	DRY CLEANING/BLEED RUNS: Dry cleaning may be done where wet cleans are not practical (eg in feed mills).  In cases where it's not possible to do dry or wet cleaning, a bleed run may be done, by passing a suitable product through the equipment to purge it of any non-approved, gm or medicated material.
11.6.04 OF&G STD	DOCUMENTATION: There must be clear simple written cleaning procedures and checklists. The checklists must be signed off when cleaning and final water rinses have been done.  For dry cleans, the checklists must be signed off when the equipment has been cleaned and checked to make sure there are no residues left.
11.6.05 OF&G STD	WATER: Mains water is chlorinated and may be used but extra chlorine may <u>not</u> be added. However where levels are variable, it is acceptable to treat the water to ensure a consistent level. Where this is done, the residual level at point of use must be monitored on a daily basis and must never be above the WHO Guideline of 1mg/litre.  If borehole or well water is used, it must be treated, in accordance with statutory requirements, to ensure it is potable (safe for drinking). Levels of chlorine, if used, must be strictly monitored and residual levels must never be above 1mg/litre.
11.6.06 DEFRA GN	(Annex III B.1 GN) Production establishments must conform to all relevant statutory requirements in regard to animal welfare, transport of livestock, premises, equipment, the facilities that must be provided, <u>general hygiene</u> and the precautions that must be taken to protect food from contamination or deterioration.

**11.6 Cleaning - continued**

11.6.07 DEFRA GN	(Annex III B.5.1 GN) Records must be kept of plant cleaning schedules including a list of all substances used.
11.6.08 OF&G GN	Whichever type of cleaning is done, checks should be carried out to make sure it is satisfactory (eg visual check, biotrace, swabs, carry-over tests).
11.6.09 OF&G STD	FOGGING/SPRAYING: If cleaning/disinfection is done using foggers/sprayers, all organic materials (including packaging) must be removed from the area. As a rule of thumb, three times the normal dispersal time should be allowed, then all product contact surfaces rinsed with potable water before they are brought back.
11.6.10 OF&G STD	Cleaning chemicals must be clearly labelled and stored safely to ensure they can't contaminate products.
11.6.11 OF&G STD	Articles of equipment used in contact with food must be of such construction and materials as to enable them to be thoroughly cleaned, to prevent matter being absorbed by them and to avoid, as far as possible, the food becoming contaminated. Product contact surfaces should be smooth, free from cracks and crevices and made from non-porous food grade materials that are inert to the food under conditions of use.
11.6.12 OF&G GN	All product contact surfaces should be readily accessible for manual cleaning or if not then readily disassembled for manual cleaning. If clean-in-place methods are used it should be demonstrated that the results achieved are equivalent to those obtained by disassembly and manual cleaning.
11.6.13 OF&G STD	The following substances are not permitted: <ul style="list-style-type: none"> <li>i) Substances that could taint or contaminate the product if used on contact surfaces;</li> <li>ii) Persistent or carcinogenic disinfectants.</li> </ul>

**11.7 Pest Control**

**(Note: All Defra Guidance Notes in this section are from Annex III B 5.1)**

11.7.01 OF&G STD	Good housekeeping, buying from good suppliers, checking incoming goods for infestation, keeping the fabric (walls/floors/doors) in good condition and use of fly screens, etc. should reduce the need for pest control. If further pest control is needed, approved methods are wax block rodent baits (using licensed poisons), electric fly killers (EFKs), pheromone traps or sonic methods.  There must be a plan of the site showing locations of bait stations, etc. and these should be placed where there is no risk of contaminating product.
11.7.02 OF&G STD	Sprays and fumigants are <u>not</u> approved for regular use because these can contaminate products/packaging. In special cases (e.g. infestation) spraying with approved chemicals <u>may</u> be done but all organic ingredients/products/packaging must be removed from the area, extra dispersal time allowed and all product contact surfaces rinsed with potable water before they are brought back. The certification office must be contacted before such a spraying programme commences. (See paragraphs 11.7.09 to 11.7.11)

**11.7 Pest Control - continued**

11.7.03 OF&G GN	<p>If an external pest control contractor is used, the contractor should be a member of the BPCA (British Pest Control Association) or equivalent body and be made aware that the site is organic and that appropriate treatments should be used. (The contractor should be asked to put a letter confirming this, in the site pest control manual.)</p> <p>If pest control is done in-house, the person should be trained to understand COSHH issues etc. There should be an appropriate bait plan, a safety data sheet for each chemical used and all treatments should be recorded. (A copy of OF&amp;G Record Sheet 48 may be used)</p> <p>Only chemicals that are suitable for use in the food or feed industry (as appropriate) may be used.</p>
11.7.04 DEFRA GN	<p>This guidance has been set out to achieve the following objectives:</p> <ul style="list-style-type: none"> <li>i) To emphasise the importance of prevention rather than cure;</li> <li>ii) To avoid contamination of organic food by any form of pests, be that infestation from micro-organisms, insects, rodents or other pests;</li> <li>iii) To ensure that organic foods are not affected by contamination from substances used to control pests;</li> <li>iv) To minimise environmental harm resulting from the control of pests.</li> </ul>
11.7.05 DEFRA GN	<p>A preventive programme is the basis of effective pest control. The operator must therefore be able to demonstrate, including written records, that:</p> <ul style="list-style-type: none"> <li>i) All storage and production premises, whether operator or third party controlled are managed as set out below;</li> <li>ii) The design and construction of the premises are suitable for the prevention of pest and infection build up;</li> <li>iii) Adequate control measures are taken to prevent imported pests. This should include raw materials via checks on incoming products, supplier audits and also on other risks, in particular second hand plant;</li> <li>iv) Good stock rotation has been maintained;</li> <li>v) The operator must be able to demonstrate that they have taken the necessary precautions to ensure that newly employed plant or premises are free from contamination by non-permitted materials;</li> <li>vi) Potential entry points for pests are controlled e.g. drains, door, windows, ventilation ducts are screened;</li> <li>vii) The site is well managed e.g. outside walls kept clear, spillage cleared and appropriate waste management practices in place;</li> <li>viii) There exists an effective cleaning programme, clearly documented, thoroughly implemented and accurately recorded;</li> <li>ix) Regular monitoring and pest activity should be undertaken by a registered pest control contractor or suitably trained person and records kept.</li> </ul>
11.7.06 DEFRA GN	<p>In the event that the preventative measures are not effective, the following requirements must be met:</p> <ul style="list-style-type: none"> <li>i) Exact records must be kept of all pest control measures taken;</li> <li>ii) Substances used for pest control must be correctly labelled and stored under lock and key when not in use;</li> <li>iii) Any measures using controlled substances must prevent direct contact with organic raw materials or product;</li> <li>iv) All treatments must be carried out by a suitably qualified person and in accordance with COSHH Regulations 1989.</li> </ul>

## 11.7 Pest Control - continued

11.7.07 DEFRA GN	<p>Those parts of the site that are not used for organic production or storage, and which are under the control of the operator should be treated, where possible, using only methods permitted or restricted below.</p> <p>Use of other methods must ensure the prevention of contamination of organic production or storage by migration, contact, personnel etc.</p> <p>In cases where fumigation of premises, plant or equipment is required the treatment must be carried out in accordance with the COSHH Regulations. Adequate clearance time must be allowed for the fumigant to disperse and effective steps must be taken to ensure that fumigant residues do not remain on product contact surfaces before the premises, plant or equipment is used again for organic production. Organically produced raw materials, semi-finished or finished products must not be present when fumigation treatments are carried out.</p>	
11.7.08  DEFRA GN	The following substances and processes are permitted:	
	<b>Name</b>	<b>Description, compositional requirements, conditions for use</b>
	Freezing, heating and vacuum. Carbon dioxide, Nitrogen.	For treatment of products and packaging.
	Ozone (gas)	Fumigation of food processing and storage premises, particularly against mould in dairies. Neither personnel nor organic products should be present during fumigation.
	Mechanical barriers, sound and light, including UV.	
	Electrical insect killers.	
	Legally approved rodenticides or insecticides	Tamper evident bait stations containing legally approved rodenticides or insecticides in locations where there is no risk of contamination.
	Pheromone traps and sticky boards not containing pesticides.	Where the latter are used for rodent control, they must be in accordance with British Pest Control Association Code of Practice (Appendix 1).
	Dessicant dust	Dessicant dusts (eg Diatomaceous earth and Amorphous silica) derived from naturally occurring sources and where there is no risk of contamination.
11.7.09  DEFRA GN	The following materials may only be used under the conditions specified:	
	<b>Name</b>	<b>Description, compositional requirements, conditions for use</b>
	Synthetic pyrethroids.	<p>Only for:</p> <ul style="list-style-type: none"> <li>i) Enclosed and sealed units such as motor housings and wiring conduits;</li> <li>ii) Band applications around entrances and external apertures.</li> </ul>

**11.7 Pest Control - continued**

11.7.10 OF&G STD	Pyrethrins, extracted from a natural botanical source and synergised using Piperonyl butoxide (BPO) derived from a natural source eg oil and sassafras.	<p>When using as a surface treatment, space spray or fog for insect control, any organic products or contact packaging must be removed or protected in such a way as to form an effective barrier to contact with the spraying agent.</p> <p>The barrier is to remain in place for 24 hours after the spraying has taken place.</p> <p>Adequate ventilation and cleaning of contact surfaces must take place after the 24-hour withdrawal period and prior to resumption of processing of organic food within the treated area.</p>
11.7.11 DEFRA GN	Permission to use restricted treatments should be sought in advance from the certification office. The application should detail reasons for use, substance and details of the procedures to avoid product contamination. In exceptional circumstances, treatment may be carried out and the certification body notified within two working days. Certification bodies should not issue consecutive retrospective permissions.	
11.7.12 OF&G STD	Any control substances not listed as permitted or restricted for use in paragraphs 11.7.08 to 11.7.10, including Organo-phosphates and known carcinogenic substances, are prohibited.	

**11.8 Records for Traceability and Mass Balance**

11.8.01 OF&G STD	<ul style="list-style-type: none"> <li>i) Records must be kept with full details of all raw materials bought in. These should include, as a minimum, type of ingredient, amount, supplier, date, batch number;</li> <li>ii) It must be possible to trace all ingredients used, from intake through to the final products and to compare quantities of organic ingredients used with quantities of finished products made (ie do a mass balance);</li> <li>iii) Controls and records should be such that traceability of ingredients/products is not lost at any stage during the production/packing/despatch process;</li> <li>iv) These records should include material used for bleed runs, rework and work-in-progress where applicable. (OF&amp;G Record Sheets 44, 45 and 46 may be used);</li> <li>v) A complete physical stocktake of the site should be done at least once per year.</li> </ul>	
11.8.02 OF&G GN	<p>To do a mass balance calculation or reconciliation between inputs and outputs, the following information is normally required. It can be done over a day, a week or a month depending on the type of business:</p> <ul style="list-style-type: none"> <li>i) Quantities of raw materials in stock</li> <li>ii) Quantities of raw material delivered</li> <li>iii) Quantities of finished products made and their recipes</li> <li>iv) Wastage (including bleed run material)</li> <li>v) Quantities of finished products sold</li> <li>vi) Quantities of finished products remaining in stock</li> </ul> <p>It is understood that these figures may not be exact (eg weights of ingredients in silos can normally only be estimated), but should be sufficiently accurate to allow a reasonable estimate of inputs versus outputs.</p> <p>OF&amp;G Record Sheet 56 can be used for calculating a mass balance.</p>	

**11.8 Records for Traceability and Mass Balance - continued**

11.8.03 OF&G GN	<p>Examples of despatch records:</p> <ul style="list-style-type: none"> <li>i) Wholesale transaction – copy of despatch/delivery note or sales invoice;</li> <li>ii) Retail outlet – carbon copy from duplicate book or till record (Barcodes may enable till to print name of each product, otherwise products can be coded eg pork 01, beef 02, lamb 03, etc. so that total sales of each type of product per day or week can be recorded.);</li> <li>iii) Home delivery (veg box) scheme – copy of list of ingredients of standard veg boxes sent out each week plus details of special orders;</li> <li>iv) Restaurant – daily menu, recipe sheets and record of numbers of each type of meal sold. (Good planning is required for this type of operation – it can be difficult to get the information for a mass balance).</li> </ul>
11.8.04 DEFRA STD	<p>(Annex III 6.1) Stock and financial records must be kept in the unit or premises, to enable the operator and the inspection body or authority to trace:</p> <ul style="list-style-type: none"> <li>i) The supplier and, where different, the seller, or the exporter of the products;</li> <li>ii) The nature and the quantities of agricultural products as referred to in Provision 1 (paragraph 5.1.01) (<i>i.e. organic</i>) delivered to the unit and, where relevant, of all materials bought and the use of such materials and, where relevant, the composition of the compound feedingstuffs;</li> <li>iii) The nature, the quantities and the consignees and, where different, the buyers of any products as referred to in Provision 1 (paragraph 5.1.01) (<i>ie organic</i>), which have left the unit or the first consignee's premises or storage facilities;</li> <li>iv) Any other information required by the inspection body for the purpose of proper inspection.</li> </ul>
11.8.05 DEFRA STD	<p>(Annex III 6.2) The data in the accounts must be documented with appropriate justification documents. The accounts must demonstrate the balance between the inputs and the outputs.</p>
11.8.06 DEFRA GN	<p>(Annex IIIB 5.1 GN) Processors must keep accurate records of their processing activities and make these available to inspection bodies. The records must be sufficiently comprehensive to allow the organic raw materials used in finished products to be traced back to the original source. The records must be retained for a period of not less than 3 years.</p> <p>Records should include:</p> <ul style="list-style-type: none"> <li>i) The origin, nature and quantities of organically produced agricultural products which have been delivered to the unit;</li> <li>ii) The origin, nature and quantities of non-organically produced agricultural products, non-agricultural ingredients and processing aids which have been delivered to the unit;</li> <li>iii) The composition of the organically produced products;</li> <li>iv) The nature, quantities and consignees of the organically produced products which have left the unit;</li> <li>v) Stock records for raw materials and finished products;</li> <li>vi) Plant cleaning schedules including a list of all substances used;</li> </ul>

**11.8 Records for Traceability and Mass Balance - continued**

11.8.06 cont.	<p>vii) Details of any fumigation treatment of premises or equipment including dates of treatment, method of application, substances used, person or organisation responsible for the treatment, clearance time between completion of the treatment and the commencement of processing operations on organic products;</p> <p>viii) Pest control records including a list of the substances used.</p>
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**11.9 Training**

11.9.01 OF&G STD	<p>All Staff whose activities may affect the integrity of the organic products (including goods-in, processing, packing and cleaning staff) must be trained so that they fully understand the organic procedures and comply with them.</p> <p>There must be records to show this training has taken place.</p>
11.9.02 OF&G STD	<p>i) A copy of the OF&amp;G Control Manual must be on site and available for all staff with responsibility for organic processing operations;</p> <p>ii) A simple procedure must be written by each operator to explain how the organic requirements (summarised at paragraph 11.1.01) apply to their process;</p> <p>iii) The HACCP (see section 11.5) must be taken into account when drawing this up;</p> <p>iv) Staff must be trained to understand and comply with this procedure.</p>

**11.10 Non-Approved Processes**

11.10.01 OF&G STD	<p>Certain processes such as ionising radiation, solvent extraction and hydrogenation of oils are not allowed in organic processing.</p>
11.10.02 DEFRA STD	<p>(Provision 5.3 e) The product or its ingredients must not have been subject to treatments involving the use of ionising radiation.</p>
11.10.03 OF&G STD	<p>Slow and ritual methods of livestock slaughter are not permitted.</p>

**11.11 Packaging**

11.11.01 OF&G STD	<p>Packaging must be adequate to protect the product and be stored off the floor and away from walls, in clean, dry conditions. Packaging should be made of environmentally benign (ie biodegradable) materials and/or be returnable where practicable.</p>
11.11.02 DEFRA GN	<p>(Annex III 7.3 GN) As far as is reasonably practicable, biodegradable materials made from plant materials eg starch-based plastic should be used for the packaging of organic products.</p>
11.11.03 DEFRA GN	<p>(Annex III 7.3 GN) Materials used for product packaging must be of food grade quality, clean, unused and be strong enough to protect the product during handling, transit and as appropriate display. The packaging must not affect the organoleptic character of the product or transmit to it any substances in quantities that may be harmful to human health.</p>

**11.11 Packaging - continued**

11.11.04 OF&G STD	Partnership Programme – PVC films free from plasticisers may only be used for non-fat foods.
11.11.05 OF&G STD	Partnership Programme – Aluminium foils are not permitted when in direct contact with acidic foods (equal to or less than pH 4.5) or salty foods (in excess of 2%) unless the film has been laquered.
11.11.06 OF&G STD	Partnership Programme – Expanded polystyrene packaging made with CFCs is not permitted.

**11.12 Labelling and Marketing**

<b>The full Standards and Guidance Notes for the Labelling of Organic Products are given in Section 4 of this Manual. The notes below give a brief summary.</b>	
11.12.01 OF&G STD	<p>A product label must clearly and accurately describe the product – it must <u>not</u> be misleading. It must also comply with all relevant legislation.</p> <p>UK law states that food products must be labelled with:</p> <ul style="list-style-type: none"> <li>i) The name of the food;</li> <li>ii) Declaration of quantity (weight or volume);</li> <li>iii) A list of the ingredients in descending order;</li> <li>iv) A 'use by' or 'best before date' (if this does not provide sufficient traceability, a batch code must also be used);</li> <li>v) Usage or storage instructions;</li> <li>vi) The name and contact details of the manufacturer, packer or seller.</li> </ul>
11.12.02 OF&G STD	<p><b>For organic products</b>, the following is also required:</p> <ul style="list-style-type: none"> <li>i) The statement '<u>Organic Certification UK X</u>' must be on the label of all food/feed products to identify the certification body with which the producer/processor is registered. (For OF&amp;G licensees, the code is UK2);</li> <li>ii) In the list of ingredients, the organic items must be clearly differentiated from those that are non-organic;</li> </ul>
11.12.03 OF&G GN	Use of the certification body's logo is voluntary. However it is useful as a marketing aid and OF&G's logo includes the statement 'Organic Certification UK2', and thus incorporates the requirement at paragraph 11.12.02 i).

**11.13 Effluent Control**

11.13.01 OF&G STD	One of the basic principles of organic farming is the avoidance of pollution. (paragraph 7.1.02 v). Organic processing enterprises must follow the same principle and develop procedures to minimise their impact on the environment.
11.13.02 OF&G GN	Waste materials should be recycled or processed on site wherever possible to minimise their impact on the environment.

**11.14 Handling and Storage of Cereals and Legumes**

11.14.01 OF&G STD	Processes involving the handling and storage of cereals and legumes in bulk must additionally comply with the relevant standards in Section 7.17.
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**11.15 Specific Provisions for Animal Feed Processors**

11.15.01	(Annex III E) This Section applies to any unit involved in the preparation of animal feedingstuffs, compound feed and the feed materials on its own account or on behalf of a third party, <i>where these products carry or are intended to carry references to the organic production method. These requirements shall not apply to pet foods, feed for fur animals or feed for aquatic animals.</i>
11.15.02	<i>The manufacturers of pet food and feed for fur or aquatic animals may voluntarily submit their operations to the certification regime and production standards specified in this Manual.</i>
11.15.03	<i>The detailed requirements for the labelling of animal feeds are given in Section 4.3 and for the constituents of animal feeds in Section 8.4.</i>

**Initial Inspection**

11.15.04	(Annex III E 1.1) The full description of the unit referred must: <ul style="list-style-type: none"> <li>i) Indicate the facilities used for the reception, preparation and storage of the products intended for animal feed before and after the operations concerning them;</li> <li>ii) Indicate the facilities used for the storage of other products used to prepare feedingstuffs;</li> <li>iii) Indicate the facilities used to store products for cleaning and disinfection;</li> <li>iv) Indicate, where necessary, the description of the compound feedingstuff that the operator intends to produce, in accordance with Article 5(1)(a) of Directive 79/373/EEC, and the livestock species or class for which the compound feedingstuff is intended;</li> <li>v) Indicate, where necessary, the name of the feed materials that the operator intends to prepare.</li> </ul>
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**11.15 Specific Provisions for Animal Feed Processors - continued**

11.15.05	(Annex III E 1.2) The measures taken by operators, to guarantee compliance with this Regulation must include: <ul style="list-style-type: none"> <li>i) In particular an indication of the precautionary measures to be taken in order to reduce the risk of contamination by unauthorised substances or products, the cleaning measures implemented and the monitoring of their effectiveness;</li> <li>ii) Identification of all elements of their activities crucial for guaranteeing at all times that the products prepared in such units comply with the requirements of this Manual;</li> <li>iii) The establishment and implementation of, compliance with and updating of appropriate procedures, based on the principles of the HACCP (Hazard Analysis and Critical Control Points) system.</li> </ul>
11.15.06	(Annex III E 1.3) The inspection body or authority shall use these procedures to carry out a general evaluation of the risks attendant on each preparation unit and to draw up an inspection plan. This inspection plan must provide for a minimum number of random samples depending on the potential risks.

**Inspection Visits**

11.15.07	(Annex III E 4.1) In addition to the complete annual visit: The inspection body or authority must make targeted visits based on a general evaluation of the potential risks of non-compliance with these Standards; The inspection body or authority shall pay particular attention to the critical control points pointed out for the operator, with a view to establishing whether the surveillance and checking operations are carried out as they should be; All the premises used by the operator for the conduct of his activities may be inspected as frequently as the attendant risks warrant.
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**Documentation**

11.15.08	(Annex III E 2.1) For the purposes of inspection of the operations records shall include information on the origin, nature and quantities of feed materials, additives, sales and finished products.
11.15.09	<i>The detailed requirements for record keeping are specified in Section 14 of this Manual.</i>

**Receipt of Products**

11.15.10	(Annex III E 6.1) On receipt of ingredients for organic feeds, operators must check the closure of the packaging or container where it is required, check the organic labelling (where appropriate) and cross-check this with information on accompanying documentation. The results of these checks should be recorded.
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**Processing Units**

11.15.11	(Annex III E 3.1) When preparing products, operators must ensure that: <ul style="list-style-type: none"> <li>i) Organically-produced feedingstuffs or feedingstuffs derived therefrom, in-conversion feedingstuffs or feedingstuffs derived therefrom, and conventional feedingstuffs are effectively physically separated;</li> </ul>
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**11.15 Specific Provisions for Animal Feed Processors - continued**

11.15.11 cont.	ii) All equipment used in units preparing compounded feedingstuffs covered by this Regulation is completely separated from equipment used for compounded feedingstuffs not covered by this Regulation
11.15.12	(Annex III E 3.2) Notwithstanding the provisions of section 11.15.11 ii), until 31st December 2007, operations may take place using the same equipment provided that a derogation has been issued by the inspection body and the following controls are in place:  i) Separation in terms of time is guaranteed and suitable cleaning measures, the effectiveness of which has been checked, have been carried out before commencing preparation of the products covered by this Regulation; operators must record details of these measures;  ii) Operators must ensure that all appropriate measures are implemented, depending on the risks evaluated in accordance with paragraphs 11.16.05 and 11.16.06, and, where necessary, guarantee that products which do not conform to the requirements of this Manual cannot be placed on the market with an indication referring to organic farming.

**Transporting products to other preparation units or storage premises**

11.15.13	(Annex III E 5.1) Operators must ensure that the following conditions are met:  i) During transport, organically-produced feedingstuffs or feedingstuffs derived therefrom, in-conversion feedingstuffs or feedingstuffs derived therefrom, and conventional feedingstuffs must be effectively physically separated;  ii) The vehicles and/or containers which have transported non-approved products may be used to transport approved products if:  a) Suitable cleaning measures, the effectiveness of which has been checked, have been carried out before commencing the transport of products covered by this Manual; Operators must record these operations;  b) Operators must ensure that all appropriate measures are implemented, depending on the risks evaluated in accordance with paragraphs 11.16.5 and 11.16.6, and where necessary, guarantee that products which do not conform to these Standards cannot be placed on the market with an indication referring to organic farming;  c) The inspection body or authority of the operator has been informed of such transport operations and has agreed thereto. Such agreement might be provided for one or more transport operation(s);  iii) The finished products referred to in this Manual are transported separately from other finished products physically or in time;  iv) During transport, the quantity of products at the start and each individual quantity delivered in the course of a delivery round must be recorded.
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