

SOPA Processing Programme

Preparation for Inspection (Application Assessment and Annual Surveillance)

Thank you for supporting the Scottish Organic Producers Association Programme for Processors, Importers and Animal Feed Compounders

The inspection of your processing activities will take place soon. The time required for inspection will be as little as two hours for a small scale simple processing operation and up to four to six hours for a complex processing operation. Where the inspector is unable to find sufficient evidence that the requirements of the SOPA Standards are being met or finds that the Standards are not being met this is called a non-compliance. The inspector will draw this to your attention so that you can understand what is wrong. They will also complete a Non-compliance and Comments Report (NCCR) at the end of the inspection, which identifies the non-compliances against the SOPA Standards. The inspector will ask you to agree a timescale (usually no more than one month) for implementation and notification of corrective action to bring operations back into compliance with the SOPA Standards. The inspector can discuss what measures may be necessary to bring the operation into compliance in general terms, but they cannot give specific or proscriptive advice for legal reasons. Copies of the NCCR will be left with you.

Only when the action taken to correct non-compliances has been notified to and approved by the SOPA certification officer can an annual certificate be issued or renewed.

In preparation for your inspection please ensure that you have all the relevant information readily to hand. You may find it useful to carry out the steps outlined below:

1. SOPA Standards – Sections 5 to 11

Ensure that you have the up-to-date SOPA processing standards and are familiar with the sections relevant to your production. A copy of the Standards or the relevant sections must be available to all key personnel involved in the organic production.

2. Organic Integrity Management Plan & Organic Integrity Matrix

All processors must have written procedures (the Organic Management Plan) describing how they maintain the organic integrity of the products from receipt to dispatch. SOPA has developed two management record sheets, which are on the enclosed (Standards CD in Section 10 as Word and PDF documents), to help you develop and organise your procedures and record documents. These pro-forma management plans identify the Key Standards relevant to maintaining the integrity of organic ingredients and finished products as they pass through the processing system and they will guide you in developing systems to maintain compliance with the SOPA Standards. The documents can be used in several ways:

Record Sheet 17 - Organic Integrity Management Plan

- This is primarily designed for simple and on farm processing operations with limited existing documentation of systems.
- The information can be written directly into the relevant pages and filed as a hard copy; or
- The Key Standard pages can be used as dividers in a ring binder or lever arch file to organise your documents and file written procedures or copies under the relevant section; or
- If the procedures and record documents are kept elsewhere, these can be referenced to the document number so as to ensure that they can be quickly located at inspection.

Record Sheet 18 - Organic Integrity Matrix

- Alternatively, the Organic Integrity Matrix can be used as an adjunct to your Food Safety HACCP. This uses the same Key Standards as the Management Plan but puts them in the form of a HACCP matrix so they can be slotted into the relevant section of your Food Safety HACCP.
- Use the list to identify the Key Standards as Critical Control Points, record the summary of the Standards and identify the operating procedures and verification documents and/or their location.

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The SOPA inspector will audit the procedures in the Management Plan against the Key Standards in whichever of these above formats it is kept.

3. Product Composition

Refer to Sections 7 when formulating new products.

Ensure the relevant Product Specification Sheets (Section 10) are completed for new products and up-to-date for existing products and have copies ready for the inspector to check and take away. SOPA must have copies of the specification sheets for all the products to be certified.

- Single Ingredient Product Specification (Section 10, Record Sheet 1) – to be used to list the products that contain a single agricultural ingredient e.g. beef cuts, joints etc, eggs, tomatoes or wheat.
- Multi-ingredient Product Specification (Section 10, Record Sheet 2) – one to be established for each product that contains more than one ingredient, whether these are agricultural ingredients or non-agricultural ingredients such as additives. For example, a cheese will contain one agricultural ingredient (organic milk) plus the non-agricultural ingredients Rennet and starter culture.
- Compound Animal Feed Product Specification Sheet (Section 10, Record Sheet 3) – to be used as the Multi-ingredient sheet above but specifically for animal feeds.

4. Labelling

Refer to Section 6 when developing new product labels.

Samples of the labels must be available for the inspector to check and take away. SOPA must have copies of the labels in use for the all the products before they can be certified. **Do not have new labels printed until they have been approved by SOPA in case amendments have to be made.**

5. Importers

Importer's Product Specification (Section 10, Record Sheet 16) – specify the products that are to be imported.

Importers of products from 'third countries' must be familiar with Section 9 of the SOPA Standards. Products to be imported from 'non-approved countries' must be approved by Defra (see 9.05). In all cases the consignment must be accompanied by the 'EC Certificate of Inspection' (see 9.07).

6. Records

All the relevant records must be available for the audit. The following checklist may be used to identify those records that must be available:

All Operators

SOPA Standards	Up-to date version plus amendments and technical updates.	
Organic Integrity Management Plan	Up-to date version	
Statutory Registrations	Copies of approval certificates, correspondence and results of previous inspection.	
Food Safety HACCP	Up to date version plus Prerequisites and verification documentation.	
Voluntary registrations with Quality Assurance Schemes e.g. BRC, UFAS	Copies of approval certificates, correspondence and results of previous inspection.	
SOPA Certification	Original SOPA Certificates (renewals only)	
Compliance Details	Copies of Compliance forms and related correspondence (renewals only)	
Complaints Record	Register of complaints received and actions taken.	
Organisation Chart	List of key personnel and their responsibilities.	
Product Composition	Single Ingredient and Multi-ingredient Product Specification sheets & Feed Ingredient Sheets.	

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Ingredient Specifications	Specifications for non-organic ingredients, additives and processing aids etc.	
Non-GM Declarations	For non-organic ingredients, additives and processing aids etc.	
Water Quality	Test results, equipment maintenance schedules etc.	
Labelling	A sample of the label or packaging for each product.	
Approved Suppliers	A list of the suppliers of organic and/or copies of their certificates and trading schedules.	
Sub-contractors	The agreement to sub-contract a processing or storage operation and copies of the daily records monitoring the activity.	
Process Flow Diagram	Identifying the stages and critical controls.	
Purchases	Purchase invoices etc.	
Goods Received	Delivery notes, invoices, record of organic status being verified.	
Storage	Especially for bulk bins etc.	
Production Records	Mixing sheets, processing records, packing sheets, raw materials returned to store, work in progress, box scheme contents etc.	
Dispatch Documents	Copies of delivery notes etc.	
Sales	Sales invoices, till receipts, quantities taken to and returned from farmers markets, daily menus in restaurants etc.	
Traceability	The dates or batch numbers used to enable ingredients to be traced from reception to dispatch.	
Input/Output Reconciliation	Input, production and output records, internal reconciliation records etc.	
Cleaning Operations	Cleaning schedules and materials used for each operation and check lists recording that they have been done and signed off.	
Rodent & Pest Control	Contractor details, in-house operator qualifications, visits or checks, activities, baiting plan, materials used and COSHH Safety Data Sheets.	
Maintenance & Calibration	Procedures/programmes for maintenance and equipment calibration and records of operations carried out.	
Product Testing	Programmes for testing for microbiological, pesticide and GM contamination etc., and testing certificates.	
Non-conforming Products	Procedures, details of the actions taken and destination of non-conforming products.	
Product Recall	Procedures, details of products recalled, destination and test recalls.	
Waste Materials	Details of contractors and records of collections etc.	
Staff Facilities & Personnel Hygiene	Procedures, health declarations and records, control of visitors etc.	
Training	Procedures, training records, qualifications and training certificates etc.	

Importers

Imported Product	Imported Product Schedule	
Defra Approval for Importers	The Defra approval letter for each product and each country (where the product comes from a non-approved third country).	
EC Certificates of Inspection	The original document for each consignment from all third countries.	