

## SOPA Programme for Certifying the Processors, Importers and Animal feed Compounders of Organic Products

### Introduction and Conditions for Issuing and Maintaining Certification

#### 1. Introduction to Scottish Organic Producers

Scottish Organic Producers Association was founded in 1986 to promote organic food in Scotland through supporting organic farmers.

The Association became a certification body and was approved by Defra in 1992 to inspect and certify organic farmers under the EC Regulation 2092/91. In 2001 SOPA contracted Scottish Food Quality Certification (SFQC), to carry out all the inspection and certification operations on its behalf. The SOPA Organic Certification Scheme was granted accreditation to EN45011/ISO65 by United Kingdom Accreditation Service (UKAS) in 2004.

In response to the food processing industry demand for a Scottish based Organic Certification Scheme, SOPA and SFQC have jointly developed a new programme for the certification of processors, importers and animal feed compounders. **SOPA now certify under the EU Regulation (EEC) 843/2007 and (EEC) 889/2008 which lay out the statutory regulations processors and importers of organic products and animal feed in the United Kingdom.**

This leaflet explains the legal requirements and conditions that organisations wishing to obtain organic product certification through SOPA/SFQC must comply with.

#### 2. Statutory Obligations

The labelling, marketing and production of organic food is controlled by Regulation (EEC) **837/2007** and enshrined in the UK Organic Products Regulation 2004. A producer, processor or importer of food or animal feed must submit their organisation to inspection and certification by one of the Defra approved UK Organic Certification Bodies if they plan to market a product bearing any indications of or reference to 'organic' production or content on the label, packaging or promotional literature. SOPA was one of the first Organic Certification Bodies to receive Defra approval under this legislation and has been assigned the Organic Certification Body identity code '**GB Organic Certification 3**'.

#### 3. Conditions for Issuing and Maintaining Certification

##### 3.1 Application Pack

The operator must obtain an Application Pack from the SOPA offices or web site. This includes the Standards for Processing, Importing and Animal Feed Compounding and the Application Form.

##### 3.2 Application

The Application form must be completed and sent to the SOPA office.

The SOPA administrator will assess the Application Form for completeness and will acknowledge receipt and issue the invoice. The applicant will be asked to complete the steps in the Preparation for Inspection Form. An inspector will be allocated, provided with a copy of the Application Form and instructed to contact the applicant to arrange the inspection.

##### 3.3 Preparation for Inspection

The applicant must prepare for the inspection by establishing the Organic Integrity Management Plan, including the organic procedures, record documents, product composition and proposed labelling before the inspection. The SOPA proforma documents – Record Sheet 17 - Organic Integrity Management Plan or the Record Sheet 18 - Organic Management Integrity Matrix - can be used for this purpose.

### 3.4 Inspection

The SFQC inspector will carry out an audit of the operation against the SOPA Standards and will pay particular attention to key requirements, including the following:

- Organic Integrity Management Plan, organic procedures and record documents designed to ensure the integrity of the organic products.
- Proposed product composition and labelling.
- Storage, processing and transport facilities
- Existing purchase, dispatch, sale and production records and traceability system.
- Check that the records permit a sample ingredient input/output reconciliation

### 3.5 Compliance Review

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 the attention of the applicant so that they can understand what is wrong. They will also complete a 'Visit Record' sheet at the end of the inspection, which identifies the non-compliances or comments against the SOPA Standards. The applicant and inspector will 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 the applicant.

### 3.6 Certification Officer Assessment

The certification officer will assess the inspection report and may issue a typed version of the NCCR, identifying additional non-compliance or comments at their discretion.

### 3.7 Corrective Actions

The applicant must implement Corrective Action or, where appropriate, give an undertaking not to repeat the breach of the Standards again, as soon as possible and certainly within the agreed period. Details of what has been done must be recorded on the applicant's copy of the NCCR and this must be returned to the Certification Officer. Where evidence is required to demonstrate that changes have been made then, copies of the procedures or record documents must be supplied. In some circumstances a further inspection visit may be required to verify that everything has been corrected.

### 3.8 Certification

Only when the Corrective Actions have been resolved to the satisfaction of the certification officer will the SOPA Certificate of Registration be issued. This will identify the certified processing enterprises and specific products. Only those products on the certificate can be marketed as organic.

### 3.9 Notification of Changes

The operator must notify SOPA of any changes to the product line prior to them being put on the market. For a new product or change to an existing product ingredient, the completed Product Specification sheet and draft label must be sent to the certification officer for approval. A new certificate will be issued including the new products once they have been approved.

Any major changes to the company, including contact details, use of sub-contractors or new premises must also be notified to SOPA.

### 3.10 Interim and Unannounced Inspections

SOPA carries out a programme of additional inspections, some of which are based on a risk analysis. A first time organic processor is classed as high risk and may be subject to an interim inspection. In this situation, the

inspector may focus on certain aspects of the process, especially those where previous non-compliances were identified. The same process as outlined in steps 3.3 to 3.7 will be applied. The producer must give the SOPA inspector access to all premises and records during office hours on demand.

### 3.11 Annual Renewal

SOPA must inspect each operator at least once in each calendar year. , The **SOPA administrator** will notify the operator that the annual inspection is due. SOPA fees are payable at the start of each year and operators must settle their accounts by the due date to maintain their registration. The stages 3.4 to 3.8 above will be followed.

### 3.12 Defra Surveillance Audits

A percentage of organic operators are selected for a surveillance visit by a Defra inspector. This allows Defra to monitor the work of SOPA and its inspectors. The Defra inspector must be given access to the operator's premises and records during office hours on demand.