

Record Sheet 17 - Organic Integrity Management Plan

Introduction

1. The purpose of this Organic Management Plan is to:
 - a. Fulfil the requirement of the Regulation (EEC) 889 Article 26.1 and 26.2, which states:

Operators producing processed feed or food shall establish and update appropriate procedures based on a systematic identification of critical processing steps. The application of these procedures referred shall guarantee at all times that the produced processed products comply with the organic production rules set out in these Standards
 - b. To develop a HACCP (Hazard Analysis and Critical Control Points) based approach to maintaining the organic integrity of organic products by identifying the hazards to organic integrity and the **Critical Processing Steps (CPS)** that minimise the risk. It does not remove the need for processors to develop a full food safety HACCP in line with current legislation.
 - c. Provide a pro-forma Management Plan document to guide new entrants, on-farm and small scale processors and feed compounders in developing their organic procedures and quality systems, thus improving their compliance with the Organic Standards..
 - d. Maintain and improve the integrity and food safety of organic products by standardising the documentation used and introducing industry codes of best practice.
 - e. Encourage continuous improvement among organic processors by enabling procedures and records to be better organised and internally or externally audited and reviewed.
 - f. Improve the inspection and audit process by standardising the systems and filing of documents for speedier access and assessment.
2. Notes to operators:
 - a. This Management Plan is issued as a Word document on CD for computer editing or as a PDF document for completion by hand.
 - b. It is primarily aimed at on-farm and small scale processing operations where there is limited experience in developing Quality Systems. Its use is not obligatory and existing or alternative plans are acceptable provided that all the **Critical Processing Steps** are covered. Where an operator has a Food Safety HACCP and supporting documents in place, it is not necessary to duplicate those documents and a reference to the relevant HACCP documents can be provided instead. Alternatively the Organic Integrity Matrix format can be used to slot the **Critical Processing Steps** into the Food Safety HACCP.
 - d. A summary of the Standard is given but operators must refer to the full standards when developing their procedures to ensure familiarity and full compliance.
 - e. This Management Plan, or the equivalent organic procedures, must be used as part of an active operating system, for training the personnel responsible for maintaining organic integrity and empowering them to be responsible for the quality of the product throughout the production process.
 - f. The Plan or organic procedures must be reviewed and updated annually and be available at your inspection for evaluation by the inspector. Record Sheet 19 may be used to record the review. The inspector will assess your plan against the **Critical Processing Steps**. A copy of the Plan or the organic procedures may be required by your certification officer.
3. If you have any questions about completing this Plan or developing written organic procedures, please contact your certification officer or advisor.

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Company Details

Company Name/Trading Name	
Contact	
Position	
Address	
Telephone	
Fax	
Mobile	
Email	
Website	
Financial year end	

CPS 3	Compliance with Food Legislation
Hazard	Failure to notify statutory bodies of the operation and comply with food safety legislation and codes of practice through lack of information and advice.
Standards	8.3
Summary	Where required by Food Safety legislation, as enforced by the Environmental Health Officer, processing operations must have a HACCP system in place when advised to do so by the EHO.
Procedures	Complete the entries below to identify the bodies registered with.
Documentation	Append copies of correspondence, compliance reports etc. OR Reference where these documents are located:-

Local Authority Environmental Health Office (EHO)	
Contact	
Address	
Telephone	
Date registered	

Local Authority Trading Standards Office (TSO)	
Contact	
Address	
Telephone	

Meat Hygiene Inspection Service (MHIS)	
Contact	
Address	
Telephone	

Other -	
Contact	
Address	
Telephone	

CPS 4	Food Safety HACCP
Hazard	Failure to develop operating systems based on HACCP principles to identify risks to food safety potentially leading to contamination by micro-organisms and chemicals.
Standards	8.4
Summary	Processing operations must have a HACCP system in place when advised to do so by the EHO. Animal feed compounders must have a HACCP in place at all times.
Procedures	Complete the entry below to confirm that the HACCP is required and has been developed.
Documentation	Reference where the HACCP is located:-

HACCP details	
HACCP drawn up by	
Position	
Training and qualifications in HACCP	
Pro forma document if used	
Date implemented	

CPS 5	Organic Certification Details
Hazard	Failure to be certified for an operation or product, leading to non-certified products being marketed or supplied to other organic operators.
Standards	8.5
Summary	Operators must have an up to date Certificate/Trading Schedule listing all the certified products. No product may be marketed as organic unless it is listed on the Certificate/Trading Schedule.
Procedures	Complete the certification details below.
Documentation	Append your Certificates of Compliance/Conformity and Trading Schedules. OR Reference where these documents are located:-

Certification details	
Certification body	
Certification officer	
Contact telephone number	
Date first certified	

CPS 7	Key Personnel & Responsibilities
Hazard	Failure to define the key personnel and their areas of responsibility, leading to gaps in the monitoring system and non-conforming product.
Standards	8.7
Summary	Operators must have a description of the personnel in the organisation and their responsibilities.
Procedures	Complete the list of responsibly directors, partners, owners, senior staff, relevant employees below. OR
Documentation	Append the company organisation diagram or organogram. OR Refer to where this document is located:-

Key personnel and areas of responsibility.		
Name	Job Title	Responsibilities

CPS 8	Product Composition
Hazard	Failure to comply with the relevant standards for product composition, leading to non-conforming products being marketed or supplied to other organic processors.
Standards	8.8
Summary	Product Specification Sheets must be established for each product. (Pro forma specification sheets will be supplied by your certification body). A copy must be supplied to the certification body for approval and inclusion on the Certificate/Trading Schedule before the product is put on the market.
Procedures	Append a separate product schedule for the organic products and other permitted ingredients.
Documentation	Append the Single Ingredient Product Specification Sheet (SIPS) listing products containing only one agricultural ingredient Append the Multi-ingredient Product Specification Sheet (MIPS) for each product containing more than one agricultural ingredient Append compound animal feed ingredient sheets. Append product specs for all other permitted ingredients. OR Refer to where these documents are located:-

Permitted non organic or non-agricultural product details		
Product	Supplier	Product Specification/Number

CPS 10	Water Quality
Hazard	Risk to product integrity and food safety if private supplies of water are used or additional chlorine is added.
Standards	8.10
Summary	The water must be potable. Private supplies must be treated to ensure potability and be periodically tested. Additional levels of chlorine are not permitted for washing organic products.
Procedures	Describe the water supply and any treatments it is subject to.
Documentation	Append the results of testing the water. OR Refer to where these documents are located:-

Describe the water supply and any treatments undertaken.:
Describe the tests undertaken to ensure potability:

CPS 11	Labelling
Hazard	Use of incorrect labelling leading to non-conforming products being marketed or incorrect authentication of the product by processors further down the distribution chain.
Standards	8.11
Summary	All labelling must comply with the relevant standards and be approved by the certification body.
Procedures	The following procedures will be observed.
Documentation	Append a sample of each label or sample of packaging (in transparent sleeves if poly bags are involved. OR Refer to where these labels and samples are located:-

Labelling procedures
Copies of the draft labels to be supplied to the certification body for approval prior to printing and before the product is put on the market.
Each food label must include the following information; <ul style="list-style-type: none"> ▪ Name and address of the processor or sufficient information for the processor to be traced. ▪ The Organic Status of the product if containing 95%+ organic ingredients. ▪ Products containing less than 95% organic content must comply with section 6.1.7. ▪ SOPA's certification code 'GB Organic Certification 3' ▪ The batch number, packing date or use by/best before date to enable traceability.
Each animal feed label must contain <ul style="list-style-type: none"> ▪ Name and address of the processor or sufficient information for the compounder to be traced. ▪ The percentage of feed material(s) from the organic production method; ▪ The percentage of feed material(s) from products in conversion to organic farming; ▪ The percentage of conventional feed material(s); ▪ The total percentage of animal feed of agricultural origin; ▪ A list of names of feed materials from the organic production method; ▪ A list of names of feed materials from products in conversion to organic production. <p>The statement to the effect that – 'may be used in organic production in accordance with Regulations (EC) 834/2007 and (EC) 889/2008'</p> <ul style="list-style-type: none"> ▪ SOPA's certification code 'GB Organic Certification 3' ▪ The batch number, packing date or use by/best before date to enable traceability.
The use of the certification body's logo is optional but if used must comply with the terms and conditions set by the body.
The labelling of bulk products to comply with CCP 19.

CPS 12	Approved Supplier Certification
Hazard	Failure to use certified organic ingredients from approved suppliers, leading to non-conforming products being marketed or supplied to other organic processors.
Standards	8.12
Summary	The current Certificate/Trading Schedules must be obtained for all suppliers or organic ingredients and checked to ensure that the supplier is certified for the products to be supplied. The operator shall verify the Certificate of his suppliers, including wholesalers.
Procedures	List the suppliers, the products and certificate expiry dates below.
Documentation	Append a copy of each supplier's Certificate/Trading Schedule. OR Refer to where these documents are located:-

Supplier approval procedures		
Suppliers shall be instructed to supply a copy of their Certificate/Trading Schedule on renewal. Where this is not received, they must be contacted annually and asked to supply a copy.		
Supplier	Products (generic list e.g. vegetables, wholesale products)	Date certificate expires

CPS 13	Control of Non-certified Sub-contractors
Hazard	Use of uncertified sub-contractors who are not operating to the organic standards, leading to potential loss of organic integrity.
Standards	8.13
Summary	Details of storage or processing carried out elsewhere by sub-contractors not certified by an organic certification body must be subject to inspection as part of the operator's licence and monitoring by the operator during each processing operation.
Procedures	Notify certification body and provide details of all sub-contractors below.
Documentation	Append copy of the Agreement Append copy of record sheet used for monitoring the operation (a pro-forma Agreement and Record Sheet will be supplied by your certification body)

Details of sub-contractor 1	
Name of sub-contractor	
Contact	
Telephone Number	
Address	
Sub-contracted storage or processing operation carried out	

Details of sub-contractor 2	
Name of sub-contractor	
Contact	
Telephone Number	
Address	
Sub-contracted storage or processing operation carried out	

CPS 14	Process Flow & Critical Controls
Hazard	Failure to identify key parts of the processing operation and the critical controls, potentially leading to food safety issues and non-conforming product.
Standards	8.14
Summary	A process flow diagram must be established to identify the key stages of the process from raw material intake to dispatch.
Procedures	Draw a diagram or process flow chart describing the stages from intake to dispatch below. OR
Documentation	Append an existing flow chart/diagram. OR Refer to where this document is located:-

Process Flow Chart and critical controls, if any.

CPS 15	Goods Received Procedure & Organic Authentication
Hazard	Failure to check the organic status of organic ingredients or the specification of approved non-organic ingredients on arrival, potentially leading to non-conforming products being marketed or supplied to other organic processors.
Standards	8.15
Summary	The organic status of the goods must be verified on intake by checking the labels and accompanying documentation. This verification must be recorded. Where there is any doubt over the authenticity of the product, its provenance must be checked and the doubt dispelled before it can be used.
Procedures	Describe below how the check is made and recorded. OR Append written procedures detailing the intake checks.
Documentation	Append a copy of the record document used to log in the organic goods as they are received. Append a copy of the record document used to record the verification check. OR Refer to where these documents are located:-

Describe how the goods are logged in and the organic status is checked and recorded.
Describe how the specifications and labels are checked for permitted non-organic ingredients to ensure that the correct material has been received.

CPS 16 A	Storage of Raw Materials
Hazard	Loss of organic integrity due to contamination by non-organic ingredients in store or by confusion on the part of personnel leading to incorrect ingredients being used in the process.
Standards	8.16
Summary	Where non-organic raw materials are also stored on the premises, organic products must be stored in a dedicated or designated area, separate from the non-organic materials and clearly labelled.
Procedures	Describe the storage, means of separation and labelling below. OR Append a copy of the written procedures relating to the storage and separation of organic and non-organic products.
Documentation	Append a copy of the record documents used to record the storage. OR Refer to where these documents are located:-

Description of the storage, separation and labelling of organic raw materials, including dedicated sites.			
Product	Type of store (e.g. silo, pallet rack, chill)	Separation (e.g. dedicated, designated area)	Labelling (e.g. painted floor area)

CPS 16 B	Storage of Part Completed Product
Hazard	Part processed organic products contaminated or confused with non-organic products due to poor storage and labelling, leading to loss of organic integrity.
Standards	8.16
Summary	Where organic materials are part processed and stored for later completion, e.g. repacking or relabelling, the batches must be clearly labelled and stored in a designated and labelled area.
Procedures	Describe the part processing stages for a dedicated site and the means of separation where non-organic products are also part processed below. OR Append a copy of the existing procedures relating to the part processing, labelling, storage and separation of organic and non-organic products.
Documentation	Append a copy of the record documents used to monitor the part processing, labelling and storage. OR Refer to where these documents are located:-

Description of the part processing and separation procedures, including those in dedicated sites.		
Part processing operation	Type of storage,	Separation, labelling and record document

CPS 16 C	Storage of Finished Products
Hazard	Contamination of organic products, especially products stored in bulk, by non-organic products and confusion by personnel due poor storage and labelling.
Standards	8.16
Summary	Where non-organic finished products are also processed on the premises, organic products must be stored in a designated and labelled area.
Procedures	Describe the finished goods storage facility for a dedicated site and the means of separation where non-organic product are also processed below. OR Append a copy of the written procedures relating to the storage and separation of organic and non-organic finished products.
Documentation	Append a copy of the record documents used to monitor the storage of finished goods. OR Refer to where these documents are located:-

Description of the storage and separation procedures for finished goods, including those in dedicated sites.			
Product	Type of store (e.g. silo, pallet rack, chill)	Separation (e.g. dedicated, designated area, locked bin, positive release)	Labelling (e.g. painted floor area)

CPS 17	Processing Operations
Hazard	Contamination of organic products during processing by residues left from previous non-organic production runs, leading to non-conforming products.
Standards	8.17
Summary	Where non-organic raw materials are also processed on the premises, organic products must be processed as the first operation of the day, or after the clean down of the line or bleed run of organic product and completed in a single production run.
Procedures	Describe the processing stages for a dedicated site and the means of separation where non-organic product are also processed below. OR Append a copy of the written procedures relating to the processing and separation of organic and non-organic products.
Documentation	Append a copy of the documents used to monitor the processing stages. OR Refer to where these documents are located:-

Description of the processing and separation procedures, including those in dedicated sites.		
Processing operation	Means of separation, bleed run etc.	Record document

CPS 18	Packaging Materials & Packaging Storage
Hazard	Packaging contaminated with residues or can contaminate the organic product through leaching.
Standards	8.18
Summary	Food grade packaging must be used which does not leach chemicals into salty or acid foods. Reusable packaging eg for box schemes, must be clean and free from residues. Packaging must be stored in clean and dry conditions.
Procedures	Describe the packaging used and the storage.
Documentation	

Describe the types of packaging:
Describe the storage for the packaging:

CPS 19	Transport
Hazard	Contamination of organic products, especially products transported in bulk, by residues from previous loads or loss of organic status due to poor labelling and handling.
Standards	8.19
Summary	Organic products must be transported in such a way that their integrity remains intact. Products transported in bulk must be loaded in vehicles that have been cleaned and inspected prior to loading. The transporter of milk in bulk must be subject to inspection and certification by an approved organic certifier.
Procedures	Describe the transport of finished organic good below. OR Append a copy of the written procedures relating to the transport of finished products.
Documentation	Append a copy of the record documents used to monitor the cleaning and inspection of vehicles. Append organic or assurance certificates for hauliers. OR Refer to where these documents are located:-

Description of the transport of finished goods.		
Product	Type of transport (e.g. own van, bulk haulier, chilled, pallet)	Documents used to monitor cleanliness

CPS 20	Dispatch Documents & Labels
Hazard	Organic processors further down the distribution chain misidentifying organic products due to poor labelling or mislabelling.
Standards	8.20
Summary	Dispatch documents and/or labels, especially those for products transported in bulk, must have the specified information.
Procedures	Observe the procedure below.
Documentation	Append a copy of the delivery documents and invoices. OR Refer to where these documents are located:-

<p>Information to appear on accompanying labels and/or delivery documents:</p> <ul style="list-style-type: none"> ▪ The name and address of the operator sending the product. ▪ The name of the product. ▪ The organic status of the product or a statement that all the products supplied are organic products. ▪ The SOPA's certification code 'GB Organic Certification 5', unless it appears on the accompanying product label. ▪ Where the consignment is sent for further processing, the country of origin, or the term EU Agriculture' or non- EU Agriculture' (in order to permit the recipient to label the product in accordance with Paragraph 6.4.5).
<p>Bulk products being transported to another certified processor must have the following information on an accompanying document:</p> <ul style="list-style-type: none"> ▪ The name and address of the operator sending the product or where different the owner of the product ▪ The name of the product. ▪ The organic status of the product. ▪ The SOPA's certification code 'GB Organic Certification 5', ▪ The batch number to enable traceability. ▪ Where the consignment is sent for further processing, the country of origin, or the term EU Agriculture' or non- EU Agriculture' (in order to permit the recipient to label the product in accordance with Paragraph 6.4.5).

CPS 21	Ingredient & Product Traceability
Hazard	Product integrity and food safety in the distribution chain compromised if ingredients are later identified to be non-conforming and the products cannot be identified and recalled or taken off the market.
Standards	8.21
Summary	There must be a means of tracing the ingredients received through the process to the finished good.
Procedures	Describe the means by which traceability is maintained below. OR Append the written procedures describing the traceability system.
Documentation	Append samples of the documents used to maintain traceability. OR Refer to where these documents are located:-

Description of the product traceability system and the means of identifying the ingredients from reception through to dispatch.

CPS 22	Ingredient Input/Output Reconciliation
Hazard	Product integrity lost if non-organic ingredients are substituted, either intentionally or in error.
Standards	8.22
Summary	The records must demonstrate a reconciliation or mass balance between inputs and outputs. Inspectors must carry out sample reconciliations at the annual inspections and may carry out additional reconciliations at spot inspections.
Procedures	List the documents that enable the reconciliation to be done below.
Documentation	Append samples of the documents used to ensure product reconciliation. OR Refer to where these documents are located:-

Documents enabling input/output reconciliation.	
Input documents	
Processing documents	
Output documents	

CPS 23	Cleaning Procedures
Hazard	Risk to product integrity and food safety if the cleaning procedures are not adequate.
Standards	8.23
Summary	Cleaning procedures must comply with industry standards ad best practice. All cleaning chemicals must be washed off surfaces and equipment with water prior to organic production. Cleaning procedures must be recorded.
Procedures	Describe the cleaning procedures if very simple. OR Append copies of the procedures for each area, machine and time eg daily, weekly and monthly.
Documentation	Append copies of the checklists used to record a satisfactory state of cleanliness pre and post-production. OR Refer to where these documents are located:-

Describe the cleaning procedure in a very simple situation:

CPS 24	Rodent Control, Pest Control & Fumigation
Hazard	Rsk to product integrity and food safety if the product is contaminated by pests, such as rodents or birds or the chemicals used to control the pests.
Standards	8.24
Summary	Preventive measures must be in place to control the ingress of pests. Pest control must be undertaken by a licensed contractor or trained staff member, who is aware of the organic requirements. Where fumigation is required the certification body must be notified and organic products removed for a specified period. Records must be kept of all pest control and plans of baiting sites.
Procedures	Describe the rodent control measures if done in house. Describe any chemical applications or fumigation procedures carried out.
Documentation	Append copies of the checklists used to record the use of materials in house and COSHH Safety Data Sheets. OR Refer to where these documents or the Pest Control Contractor's file are located:-

Describe the rodent control undertaken:
Contractor: Accreditation: Confirming that they are aware of the organic requirements: Number of visits per year:
In house rodent control by: Materials used: Storage of materials: Training: Baiting plans:
Describe any other pesticides or fumigants used:
Material used: Purpose: Area: Frequency: Apply by: Training: Storage of materials: Date CB notified:

CPS 25	Factory Fabric & Environment
Hazard	Risk to food safety if the premises are not suitable for food and animal feed preparation and the surroundings harbour pests.
Standards	8.25
Summary	The premises must be suitable for the storage and processing of food and animal feeds and maintained to prevent the ingress of contaminants. The surroundings must be maintained in a clean and tidy state.
Procedures	Describe the maintenance programme and external cleaning procedures.
Documentation	Append copies of the records. OR Refer to where these documents are located:-

CPS 28	Non-conforming Product & Product Recall
Hazard	Non-conforming product is not immediately embargoed or recalled.
Standards	8.28
Summary	Operators must have a procedure, which prevents a non-conforming product from being dispatched. Where the fault is detected after dispatch, there must be a means of recalling it or notifying customers to remove it from the shelves. The certification body must be notified immediately of any product recall.
Procedures	Describe or append the procedures for embargoing non-conforming products and product recall.
Documentation	Append copies of the positive release documentation. OR Refer to where these documents are located:-

Describe the procedure for checking product prior to dispatch and for embargoing non-conforming products:
Describe the procedure for notifying customers and recalling a non-conforming product:

CPS 29	Disposal of Waste Materials
Hazard	Reputation of the organic sector damaged through inappropriate or illegal waste disposal.
Standards	8.29
Summary	All waste must be disposed of according to statutory requirements. Organic operators should recycle and treat waste wherever possible.
Procedures	Describe the waste materials produced and the means of disposal.
Documentation	Append details of the contractors used. OR Refer to where these documents are located:-

Describe the main waste products and the means of disposal:	
Waste product	Means of disposal, contractor etc

CPS 30	Staff Facilities and Personal Hygiene
Hazard	Contamination of the product due to inadequate staff and visitor hygiene and facilities.
Standards	8.30
Summary	Staff must maintain statutory and industry best practice hygiene standards to prevent contamination from pathogens or objects such as jewellery etc. Visitors should be controlled and recorded.
Procedures	Append or describe the hygiene practices.
Documentation	Append the records for controlling visitor. OR Refer to where these documents are located:-

Describe the main practices in place:	
Control of Risk	Facility/Practice
Toilet & washing facilities	
Protective workwear	
Basic Food Hygiene training	
Removal of jeweller, watches etc.	
Reporting of infectious/contagious illness by staff	
Control of visitors	
Other	

CPS 31	Staff Training
Hazard	Inadequate staff training and lack of understanding of the organic requirements.
Standards	8.31
Summary	Staff must undergo appropriate training to ensure that they understand the organic standards and requirements. Records must be kept of the training.
Procedures	Append or describe the training of staff.
Documentation	Append the records of staff training. OR Refer to where these documents are located:-

Describe the training that has taken place and is provided for new employees:

CPS 32	Register of Complaints
Hazard	Failure to investigate complaints against the organic products and make corrective actions to avoid reoccurrence.
Standards	8.32
Summary	Operators must have a record of complaints received and the actions taken.
Procedures	Append the procedures or describe the means of handling complaints.
Documentation	Append the records of complaints received. OR Refer to where these documents are located:-

Describe how complaints are handled and who is responsibly:

The following format is an acceptable record of complaint received:
Date received:
Complainant:
Nature of the complaint:
Investigation and action taken to prevent reoccurrence:
Responsible person:
Date conclude: