

Record Sheet 18 - Organic Integrity Matrix

Risk categories Low risk – Dedicated organic production with single ingredient products.
 Medium risk – Dedicated organic production with multi-ingredient products containing non-organic and non-agricultural ingredients.
 High risk – Non-dedicated sites also handling non-organic products.

Definitions Control Measure/Operating Procedure – The work instruction that specifies how the Key Standard is implemented.
 Monitoring or Record Document – The Record Sheet used to monitor and record that the Operating Procedure has been implemented.
 Verification Record Document & Period - The Record Sheet used to periodically check that the Operating Procedures and Monitoring Documents have been correctly implemented and the interval between or dates when the checks will be made.

No	Key Standard/Hazard	Risk	Standard	Summary of the Standards	Control Measure or Operating Procedure	Monitoring or Record Document	Verification Record Document & Period
1	Organic Standards Out of date version of the Standards and Management Plan/Organic Operating Procedures not available for reference by key personnel.		8.01 & 8.02	The Standards and Management Plan/Organic Operating Procedures must be kept up to date and available for all staff with responsibilities for organic integrity. The Management plan must be reviewed and verified periodically and at least annually.			
2	Compliance With Food Legislation Failure to notify statutory bodies of the operation and comply with food safety legislation and codes of practice through lack of information and advice.		8.03	Food processing operations must be registered with the relevant authorities.			
3	Food Safety HACCP Failure to develop operating systems based on HACCP principles to identify risks to food safety potentially leading to contamination by micro-organisms and chemicals.		8.04	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.			

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4	<p>Organic Certification Failure to be certified for an operation or product, leading to non-certified products being marketed or supplied to other organic operators.</p>		8.05	<p>Operators must have an up to date Certificate/Trading Schedule listing all the certified products.</p> <p>No product may be marketed as organic unless it is listed on the Certificate/Trading Schedule.</p>			
5	<p>Correcting Non-compliances Failure to correct non-compliances identified at inspections, leading to non-conforming products being marketed or supplied to other organic operators.</p>		8.06	<p>Operators must correct any non-compliances identified at the inspection.</p> <p>The Certificate/Trading Schedule cannot be issued or renewed until all non-compliances have been corrected and relevant evidence of compliance supplied.</p>			
6	<p>Key Personnel & Responsibilities Failure to define the key personnel and their areas of responsibility, leading to gaps in the monitoring system and non-conforming product.</p>		8.07	<p>An organisation chart or organogram must be established, listing the key personnel and their areas of responsibility.</p>			
7	<p>Product Composition Failure to comply with the relevant standards for product composition, leading to non-conforming products being marketed or supplied to other organic processors.</p>		8.08	<p>Product Specification Sheets must be established for each product. (Pro forma specification sheets will be supplied by your certification body).</p> <p>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.</p>			

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8	<p>GMO Declarations Failure to obtain positive declarations from suppliers of non-organic ingredient, potentially leading to contamination by genetically modified organisms and loss of organic integrity.</p>		8.09	<p>A declaration must be obtained from the supplier of each non-organic agricultural ingredient or approved additive and processing aid used (other than water, salt or elemental mineral). (A pro-forma declaration form will be supplied by your certification body to send to a supplier if required). This must be updated at least every two years.</p>			
9	<p>Water Quality Risk to product integrity and food safety if private supplies of water are used or additional chlorine is added.</p>		8.10	<p>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.</p>			
10	<p>Labelling Use of incorrect labelling leading to non-conforming products being marketed or incorrect authentication of the product by processors further down the distribution chain.</p>		8.11	<p>All labelling must comply with the relevant standards and be approved by the certification body.</p>			
11	<p>Approved Supplier Certification Failure to use certified organic ingredients from approved suppliers, leading to non-conforming products being marketed or supplied to other organic processors.</p>		8.12	<p>The current Certificate/Trading Schedules must be obtained for all suppliers of organic ingredients and checked to ensure that the supplier is certified for the products to be supplied.</p>			

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12	<p>Control of Non-certified Sub-contractors Use of uncertified sub-contractors who are not operating to the organic standards, leading to potential loss of organic integrity.</p>		8.13	<p>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.</p>			
13	<p>Process Flow & Critical Controls The failure to identify key parts of the processing operation and the critical controls, potentially leading to food safety issues and non-conforming product.</p>		8.14	<p>A process flow chart must be established with critical controls, e.g. temperatures identified.</p>			
14	<p>Goods Received Procedure & Organic Authentication 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.</p>		8.15	<p>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.</p>			
15	<p>Storage of Raw Materials Loss of organic integrity due to contamination by non-organic ingredients in store or by confusion</p>		8.16	<p>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-</p>			

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	on the part of personnel leading to incorrect ingredients being used in the process.			organic materials and clearly labelled.			
16	Processing Operations The potential contamination of organic products during processing by residues left from previous non-organic production runs, leading to non-conforming products.		8.17	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 cleardown of the line or bleed run of organic product and completed in a single production run.			
17	Storage of Part Completed Product Part processed organic products contaminated or confused with non-organic products due to poor storage and labelling, leading to loss of organic integrity.		8.16	Where organic materials are part processed and stored for later completion, e.g. prepacking or relabelling, the batches must be clearly labelled and stored in a designated and labelled area.			
18	Storage of Finished Product Contamination of organic products, especially products stored in bulk, by non-organic products and confusion by personnel due poor storage and labelling.		8.16	Where non-organic finished products are also processed on the premises, organic products must be stored in a designated and labelled area.			
19	Packaging & Packaging Storage Packaging is contaminated with residues or can contaminate the organic product through leaching.		8.18	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.			

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20	<p>Transport 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.</p>		8.19	<p>Organic products must be transported in such a way that their integrity remains intact.</p> <p>Products transported in bulk must be loaded in vehicles that have been cleaned and inspected prior to loading.</p> <p>The transporter of milk in bulk must be subject to inspection and certification by an approved organic certifier.</p>			
21	<p>Dispatch Documents Organic processors further down the distribution chain misidentifying organic products due to poor labelling or mislabelling.</p>		8.20	<p>Dispatch documents, especially those for products transported in bulk, must have the specified information.</p>			
22	<p>Ingredient & Product Traceability 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.</p>		8.21	<p>There must be a means of tracing the ingredients received through the process to the finished good.</p>			
23	<p>Ingredient Input/Output Reconciliation Product integrity lost if non-organic ingredients are substituted, either intentionally or in error.</p>		8.22	<p>The records must demonstrate a reconciliation or mass balance between inputs and outputs.</p> <p>Inspectors must carry out sample reconciliations at the annual inspections and may carry out additional reconciliations at spot inspections.</p>			

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24	<p>Cleaning Procedures Risk to product integrity and food safety if the cleaning procedures are not adequate.</p>		8.23	<p>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.</p>			
25	<p>Rodent Control, Pest Control & Fumigation Risk 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.</p>		8.24	<p>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.</p>			
26	<p>Factory Fabric & Environment Risk to food safety if the premises are not suitable for food and animal feed preparation and the surroundings harbour pests.</p>			<p>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.</p>			
27	<p>Maintenance & Calibration of Equipment Product does not conform to critical processing controls such as temperatures,</p>		8.26	<p>Food processing and handling equipment must be suitable for food or animal feeds and be maintained and calibrated according to the manufacturers instructions.</p>			

	weights and cooking times etc.			A record must be kept of the maintenance and calibrations carried out.			
28	Product & Environment Testing Product is contaminated with micro-organisms, pesticides or products of genetically modified organisms.		8.27	Statutory requirements and best practice for observing food safety must be observed when taking swabs and samples for testing. The laboratory must be accredited with the United Kingdom Accreditation Service (UKAS). Any positive test for a GMO or pesticide must be notified to the certification body immediately and the product embargoed. Records must be kept of all tests.			
29	Non-conforming Product & Product Recall Non-conforming is not immediately embargoed or recalled.		8.28	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.			
30	Disposal of Waste Materials Reputation of the organic sector damaged through inappropriate or illegal waste disposal.		8.29	All waste must be disposed of according to statutory requirements. Organic operators should recycle and treat waste wherever possible.			

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31	<p>Staff Facilities and Personal Hygiene Contamination of the product due to inadequate staff and visitor hygiene and facilities.</p>		8.30	<p>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.</p>			
32	<p>Staff Training Inadequate staff training and lack of understanding of the organic requirements.</p>		8.31	<p>Staff must undergo appropriate training to ensure that they understand the organic standards and requirements. Records must be kept of the training.</p>			
33	<p>Register of Complaints Failure to investigate complaints against organic products and make corrective actions to avoid reoccurrence.</p>		8.32	<p>Operators must have a records of complaints received and the actions taken.</p>			