

Scottish Organic Producers Association

Standards for the Processing and Importing of Organic Food and Animal Feeds

Sections 5 to 13

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Section 5 – Introduction

5.1 Introduction to the SOPA Processing Standards

- 5.1.1 The SOPA Programme for the inspection and certification of processors and importers of organic products was launched on 1st January 2007.
- 5.1.2 These Standards set out the requirements that applicants and existing processors must comply with.
- 5.1.3 **The EU Regulations (EEC) 834/2007 and (EEC) 889/2008 lay out the statutory regulations for processors and importers of organic products and animal feeds in the United Kingdom. The SOPA Standards incorporate the Regulations.**
- 5.1.4 Additional SOPA standards are included to fill in areas that the Regulations do not cover or which are unclear and these are identified by the normal typeface.
- 5.1.5 SOPA Guidelines are included to indicate best practice and additional information that operators may find useful but are not obligatory. These are identified as *italic typeface*.
- 5.1.6 The Standards cover both food processing and animal feeds. Where specific standards only cover animal feeds, these are identified.

5.2 Organic Processing Principles

- 5.2.1 The SOPA Standards for certified organic processing are based on a set of internationally recognised agricultural principles. These principles are:

Environmental Principles

- maximum utilisation of renewable resources and recycling
- minimisation of pollution and damage to the environment and the reduction and safe handling of waste

Food Processing Principles

- minimum processing, consistent with the nature of the food in question
- maximum information on processing methods and ingredients provided to the consumer

Social Principles

- the provision of a fair and adequate quality of life, work satisfaction and working environment for those involved
- the development of ecologically responsible production, processing and distribution chains, based on local economies.

5.3 Scope – Organic operations subject to inspection and certification

5.3.1 These Standards shall apply to the following products originating from agriculture, including aquaculture, where such products are placed on the market or are intended to be placed on the market:

- (a) live or unprocessed agricultural products;
- (b) processed agricultural products for use as food;
- (c) feed;
- (d) vegetative propagating material and seeds for cultivation.

The products of hunting and fishing of wild animals shall not be considered as organic production.

This Regulation shall also apply to yeasts used as food or feed.

5.3.2 This Regulation shall apply to any operator involved in activities, at any stage of production, preparation and distribution, relating to the products set out in paragraph 2.

However, mass catering operations shall not be subject to this Regulation. Member States may apply national rules or, in the absence thereof, private standards, on labelling and control of products originating from mass catering operations, in so far as the said rules comply with Community Law.

5.3.3 Where a product is to have any indication of organic production, whether on the label, display materials, advertising materials or website, the processor must be certified by an approved certification body and the product listed on the Certificate issued by that body.

5.3.4 The inspection and certification must also include any sub-contractors used by the processor that are not certified by another approved organic certification body..

5.3.5 The following operations fall under the above scope and must be subject to inspection and certification when involving organic plant and animal products:

- Food processing & prepacking
- Repacking or relabelling out of sight of the final consumer
- Cleaning and/or storage of crops in bulk
- Wholesaling
- Blending and compounding animal feeds
- Slaughter of livestock
- Cleaning, mixing and packing seeds
- Importing from countries outside the EU (both the importer and first consignee must be certified)
- Storage and distribution of products
- Exporting outside the EU

5.3.6 The following enterprises do NOT fall under the above scope and do not need to be inspected and certified, unless on a voluntary basis:

- Retail sales of products in sealed retail packs or containers or selected by the final consumer from the original sealed containers
- Transport of bulk products, other than milk
- None food products such as cosmetics and textiles
- Pet foods or feeds for animals not in the human food chain

- Non-agricultural products such as salt and water
- **Bulk transport of milk**
- Products of fish farming

5.4 On-farm processing operations included on the production certificate

5.4.1 SOPA can include on-farm processing activities on the farm certificate under the following circumstances:

- An on-farm processor, operating under a producer licence, is permitted to use bought-in organic or permitted non-organic ingredients required to process the products of the farm, provided that such products do not exceed 10% of the combined pre-processing weight of the ingredients of agricultural origin.

- The site is dedicated to organic production. and

- The operation involves simple processing. Simple Processing is defined as;

Where raw materials are processed in such a way that traceability and mass balance are not difficult to follow for an Inspector qualified to producer level eg:

1. cleaning;
2. peeling, chopping and slicing;
3. packing (including bought in certified products eg box schemes);
4. blending (including bought in certified products) where nature is not changed eg meusli;
5. processing of single organic ingredient where nature is not changed eg flour milling; simple butchery.

5.5 Processing operations requiring a separate registration and certificate

5.5.1 The following operations will require a separate registration and inspection:

- Where more than 10% of the organic ingredients are brought in.
- The site also stores or processes non-organic products.
- The operation involves complex processing. Complex Processing is defined as: Where raw materials are processed in such a way that the nature, weight or volume is transformed. This can involve:
 1. cooking involving weight loss(frying, baking, boiling);
 2. dehydration, re-hydration, evaporation;
 3. emulsification;
 4. fermentation.

In such cases, a separate inspection will normally be carried out by a food processing or animal feed mill inspector.

5.6 Definitions of Compliance and Penalties for Non-compliance

Assessment Feedback

- 5.6.1 During the Assessment visit, the Assessor will identify in writing any non-compliance with these Standards. The producer must sign an undertaking to carry out corrective action and indicate the date of completion for each action. Following the Assessment visit, SOPA will write to the Member with detailed feedback from the Assessment which will highlight areas of non-compliance and the time by which corrective action must be taken.
- 5.6.2 The Assessment feedback may also include notification of the SOPA Scheme Assessment Action Category for the production unit. This is intended to guide producers as to the level of action required to maintain or gain compliance with these Standards.
- 5.6.3 There are five categories of SOPA Certified performance, outlined in Table 1.7.3:

Table SFQC SOPA Scheme Assessment Action Categories

Category	Description	Action required	Time to implement	Action if not completed in time
Category 1: Organic Good Practice (Compliant)	Management of the unit is fully compliant with the SOPA Organic Standards. (eg. The approved Organic Integrity Plan is being followed)	Continue management. Look for ways to improve or extend the system.	Continue	
Category 2: Improvement required (Comment)	Elements of the unit are currently compliant but will require improvement to reach the SOPA Organic Standards and Category 1 in future. (eg. Certificates not up to date for some suppliers)	Take steps to improve management that will be fully compliant in future. Take specialist advice if unsure of action required.	As soon as possible, within one year. Changes or plans must be in place and operational by time of next SFQC Assessment.	Failure to act may lead to category 3 feedback at next Assessment visit.
Category 3: Urgent action required (Non-compliance)	Elements of the unit's management do not meet the SOPA Standards and require action to be taken to reach Category 1. (eg. Failure to obtain a GMO declaration; or insufficient records to permit a product input/output reconciliation)	Change management to alleviate the problem and comply with SOPA Standards. Take advice. Inform SFQC office once action has been taken.	Urgently, usually within one month. SFQC will set date by which action must be taken.	Failure to confirm to SFQC office that appropriate changes have been made or plans are in place by deadline date may lead to immediate Category 4
Category 4: Product suspended until action taken (Irregularity)	A serious breach of the standards is taking place. The organic integrity of a batch or product has been compromised: the certificate for the batch of product affected is suspended until the problem has been resolved and a new system is in place that has SFQC approval.	Surrender any current SFQC Organic certificate. Change current management to alleviate the problem and comply with SOPA	Immediate product suspension. Action usually within one month. SFQC will set date by which action must be taken and	Product certificate suspended until action taken. Failure to act to prevent future reoccurrence by deadline date, immediate Category 5 and

Category	Description	Action required	Time to implement	Action if not completed in time
	(eg. Non-permitted ingredient used or a batch is contamination with GM or medicated feed in error)	Standards. Specialist advice required. Inform SFQC office once action has been taken. Additional Assessment visit required to confirm to SFQC (with additional fee to Member)	additional Assessment visit made	whole unit suspended.
Category 5: Whole farm suspended until new management approved (Manifest Infringement)	A serious and potentially irreversible breach of the standards has taken place. The integrity of the organic production unit has been compromised. Whole unit is suspended and no produce may be sold as organic. New Farm Plan must be prepared and approved by SFQC, and implementation must show whole operation is reaching Category 1 before a certificate will be issued.	Surrender any current SFQC SOPA Organic Scheme certificate. Stop the activity. Take external advice to prepare new Farm Plan for SFQC approval. Implement new plan. Additional Assessment visit required once new plan in action (with extra fee).	Immediate suspension of all organic sales. SFQC will set date for new Management plan.	Failure to act, attempt to sell produce as organic or failure to prepare new Management Plan by deadline date will lead to expulsion of Member from SFQC SOPA Organic Certification Scheme.

Action to reach organic good practice

- 5.6.4 The aim of the SFQC Assessment process is to recognise and encourage good practice and to identify the steps that each Member must take to improve the management of their unit to reach organic good practice. The aim is not to ‘catch out’ producers, rather to assist every Member to take action so they can reach a full set of ‘Category 1’ feedback at their next Assessment.
- 5.6.5 The action required and usual time given to undertake corrective action is given in the above Table. Failure to act and comply by the deadline date given will lead to the next category of sanction being immediately applied. SFQC is able to confirm if proposed actions are likely to comply with the Standards. However, SFQC is not able to offer advice on the detailed steps needed to enable the unit to reach Category 1 approval. External, specialist advice is recommended for all changes and is required for Category 4 and Category 5 feedback.