

# BC Certified Organic Program

## Kootenay Organic Growers Society

### Guide to the Organic Processing/Handling Plan

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#### Introduction

This is a guide to assist you in completion of the Organic Processing/Handling Plan. You do not need to complete the Organic Processing/Handling Plan if you are just washing and bagging/package raw farm product on your farm.

COABC Organic Production Management Standards require all organic food handlers to answer a questionnaire to solicit information about every relevant topic addressed in the COABC standards. A response must be detailed enough to indicate a reasonable level of knowledge about organic production, processing or handling practices and principles, as well as to reveal any problems or concerns in adhering to the standards. Properly completing this Processing-Handling Plan (coupled with subsequent yearly updates) will provide the necessary information required. Though it may seem intimidating at first, the Plan can be a useful tool to speed your way through the certification process. Provide as much information as possible. The Certification Committee (CC) will decide your certification status, but they will never see your operation. The more information you can give, the easier it will be for the CC to make their decision. COABC sections refer to specific section numbers in the British Columbia Certified Organic Management Standards.

**How to use this guide:** Numbers in the guide correspond to numbers in the Processing Handling Plan and often give more details on what is being asked.

Abbreviations used:

- CB is Certification Body (the people you got this application from.)
- VO is Verification Officer – an independent contractor who inspects your farm at the request of your certification body. The VO makes a report to the Certification Committee of the Certification Body. A copy of this report is sent to you, but the VO does not certify your farm.
- CC is Certification Committee the group your certification body authorizes to make decisions about certification. The Certification Committee examines your farm plan and the VO report and then decides whether you qualify for certification. Sometimes the CC sets conditions you must meet for certification.

#### Section A General Information

1. Please use legal name. The certificate will be issued in this name unless you state otherwise.
2. Date of application.
3. Person who has the authority to deal with the organic certification process. This person must have appropriate authority within the company.
4. Person with ultimate responsibility.
5. Include postal code.
6. List all company physical locations where organic production or storage will take place.
7. Usually office phone.
8. Usually cell or home phone.
9. For use by certification body or verification officer.
10. same
11. Directions from a major route.
12. This is useful background information.
13. Gives the Certification Body an idea of size of operation

14. Person who on the floor, or has direct responsibility and knowledge.
15. Useful background. Please be honest in answering this question.
16. If you are currently certified by another agency let us know. Are you going to keep both certifications going?
17. The VO will want to confirm the answer to this question.
18. Check everything that applies and use the "Other" section if check boxes don't fit you, or want to explain. Here are some definitions for these purposes:

- **Processed product** is a product that has been changed: cut, cooked, fermented, combined, etc.
- **Processing Facility** is where the product is cut, cooked, fermented, combined with other products, etc. Gives CB a general idea of what the operation is.
- **Brokerage house** acts as an agent for others in negotiating a sales contract. A broker may or may not take physical or legal title to the product.
- **Packing plant** receives raw agricultural products and packs, and/or cleans the products for shipping. A packer may be involved in cleaning the products prior to packing. The packer may or may not take title to the product.
- **Re-packaging facility** receives packed or packaged products, removes the products from the original container, may or may not sort the product, and repacks the product for sale in either the original container or in a different container.
- **Distribution centre** receives packed or processed agricultural products, from farms, shippers, processors, or other distributors, and sells or distributes those products to processors, other distributors or retail stores. Distributors may or may not take title to the product.
- **Warehouse** receives and stores products. A warehouse does not take legal title to the product. A warehouse does not open product containers, mix, combine, or otherwise handle the product while it is in custody.
- **Retail outlet** is a business operating from an established place of business that sells food products directly to consumers. If you plan to apply for certification for part of your retail business, please indicate which departments you plan to have certified:

19. This should be specific, as an example: *Buy organic milk from farm, transport it to our plant, pasteurize. Make yogurt by combine with organic fruit (raspberry base or blueberries) with added organic milk solids, add bacterial culture, heat, wait and package in single serving plastic cups.*

20. List as exactly as you can, as information in your certificate will be based on this information, and your CB and VO have to know what they are verifying.

21. Go ahead – list them all.

22. CB's don't like to worry about things that a government inspector is looking after unless it directly effects organic integrity of the product.

23. The answer to this question will determine certification requirements needed for product entry into those jurisdictions. It is important that this information is provided at the start of the certification process.

24. Usually the answer is yes, but sometimes a customer asks an uncertified processor to custom process organic product for them, and the processor does not wish to certify themselves. In that case that processing for that customer can come under the customer's certification, and the customer owns the certificate. We need to know.

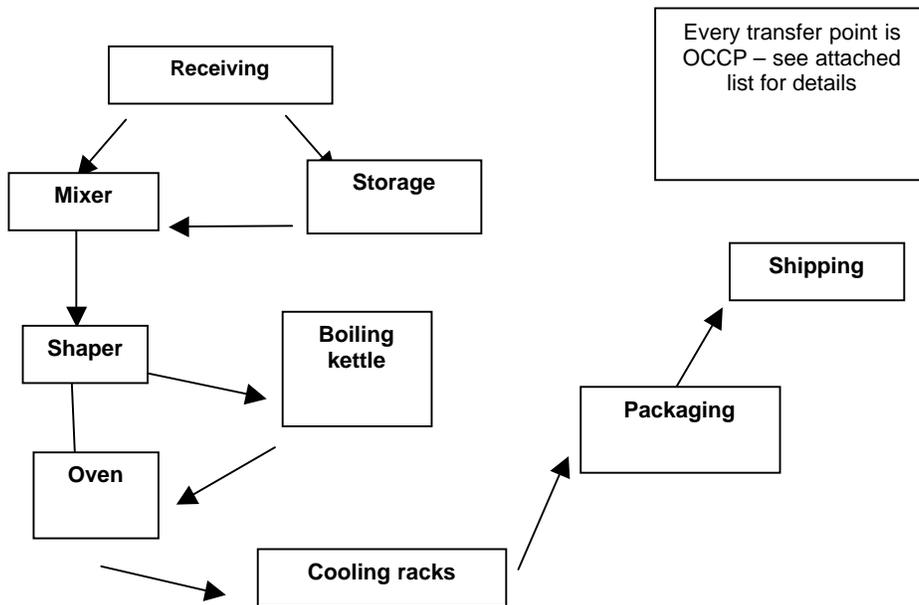
25. Custom processing - You do the processing, but your customer sells the products in their own packaging with their own brands.

26. What company is responsible for making sure ingredients or products being distributed are organic?
27. For instance: you contract with another company to make part of the product; or a vendor for instance (like a trucker taking fruit to Alberta), or for storage.
28. Do you exclusively handle organic products, or do you also handle non-organic ones.
29. These people may need to be available during verification visits.

**30. Facility plan diagram:** Supply accurate diagram(s) of the facility or facilities to be certified and the immediate surroundings. All buildings, rooms and equipment used in the receiving, processing, and storage of ingredients, works in progress, and finished products should be included in the diagram. For ease of copying the diagrams should be 8 1/2X11 without colours. Please send more than one diagram if needed for legibility. For instance you could have one showing placement of the building and nearby surroundings and another that shows the floor plan and equipment. Send your map(s) by mail (do not fax) or you may scan your map(s) and send by email. If you are ambitious, you can draw your map(s) on your computer.

**31. Flow chart(s) required.** Every type of operation must include a flow chart. Take your time. Provide a chart or sequential list of the steps used in handling organic products. A flow chart can be a simple block diagram that shows the steps that are taken in relationship to organic products. In most cases, avoid combining flow chart with facility floor plan.

**Example of a flow chart:**



The flow chart should show the steps from receipt through sales of organic goods. These steps would include receiving, initial storage, processing or packaging procedures, final packaging, and storage and transportation. Include names and functions of equipment used.

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- **Processors:** be sure to include a description of each step where the form of an ingredient is changed, including the names of the major processing equipment

- **Distributors:** be sure to include a description of each step where custody or packaging of the product is changed, including the names of the major equipment
- **Brokers:** If you do not take possession of a product include each step where a change of custody takes place.

**Organic Critical Control Points** are risk areas for where, if something goes wrong, the organic integrity of the product may be compromised. These might where there is a risk of contamination with prohibited substances, or spots where an organic and non organic product might get mixed up (commingling). Please mark the organic control points on your flow chart. Provide a list of procedures to increase organic security of the control points.

***Example of part of an OCCP report:***

***Receiving***

*Inspect carrier before unloading*

*Mark organic bags with fluorescent orange organic sticker*

*Keep BOL with producers lot number*

*Fill in receiving report & assign our lot number*

**Storage**

Store in organic only storage closet, closet marked on door

**Section B Organic Product Information**

32. The **Organic Product Profile** is **required** for each **processed** product. If you are a packer see question 34. The **Organic Product Profile** form is found at the end of this form, so you can copy it easily. No certificate can be issued until product profiles have been completed. If products under development please do your best to fill out the organic Product Profile and mark it "Under Development." You will have to submit a final version before a certificate can be issued. Organic Product Profile Sheets are issued separately from this document.

33. Part of certification will be to verify that products that you represent as organic have documentation to back up organic claim. Submit a list of all products you handle.

34. **Packer Product** list is found at the end of this form.

**Certification verification (COABC section 11.1, 11.3, 2.6)**

35. You must have documentation that all organic products or ingredients are certified organic. This is a copy of the organic certificate or an organic transaction certificate.

36. The certification documentation must be kept up to date. This will be verified by the VO.

37. COABC will accept certification from an accredited certifier. Accreditation information is usually on the certificate. IFOAM, USDA NOP, and COABC are all examples of accreditors. If in doubt you will have to ask the product's certifier.

38. You must have certification documentation before you represent ingredients products as organic.

**Section C Transportation – shipping, receiving, storage (COABC Section 11.2, 11.3)**

39. If you are only responsible for outgoing transportation, you can skip this section.

40. The next few questions look at risk of contamination or confusion with non-organic product in incoming transportation.

41. Same.

42. Same.

43. How do you know that the product is not being contaminated inside the truck?

- 44. Same. These may be labelled strapping or wire or other means where you there has been an opportunity for tampering (accidental or intentional) with integrity of product.
- 45. Organic product must be tracked and identified at all times. Methods differ.
- 46. Same.
- 47. Incoming products must be identified as organic and must be tracked throughout their time in the facility.
- 48. Same.
- 49. These are methods by which you will lessen risk of contamination or commingling.
- 50. Organic integrity must be insured at each step. Independent Storage sheet can be found at the end of this form.

### **In Process Transportation**

- 51. Here we go again trying to understand product flow and contamination risks.
- 52. same
- 53. You have to have a system for identifying and differentiating the organic product, from any other product that might be in process at the same time. Labels are often used.

### **Outgoing Product Transportation – check all boxes that apply.**

- 54. If your company is not responsible for out going product transportation you could tell us who is and skip the rest of the section.
- 55. Again looking at risk of contamination and just trying to understand the whole picture,
- 56. This identified possibility of confusion between organic and non-organic products.
- 57. same
- 58. Same. Special care has to be taken with bulk transportation.
- 59. If these facilities are not certified you will need them to fill in an Independent Storage Facility form. Such facilities may be inspected.
- 60. This refers to the boxes on the pallets being separated from each other. If this happens you will need procedures in place for keeping the organic products properly identified and to make sure no non-organic products slip in with them.
- 61. These are some methods of protecting organic integrity of product.
- 62. Product must be identified as organic on outgoing paperwork. Invoices should identify organic products as organic and include the certification bodies name.

### **Storage and Post-Harvest Treatments (COABC section 11.2, 4.8)**

- 63. You can only skip if you don't do any of these things.
- 64. It is important that the ingredients and products are stored in area where they will not get mixed up with non-organic products, or contaminated with things like detergents, gasoline, etc.
- 65. It must be clear which products are the organic ones, so that you or one of your employees doesn't grab the wrong ingredients or products by mistake.
- 66. Please answer both parts of this question.
- 67. Include ethylene ripening of organic fruit if you do if you have someone else do it for you.
- 68. All documents should identify product as organic
- 69. If finished goods have lot numbers also state this.
- 70. These facilities may be inspected.

### **Section D Pest Management (COABC Section 11.6)**

- 71. Rodenticides may not be used either in, nor around the facility.
- 72. List the ones that cause problems.
- 73. This is a broad range of pest control
- 74. Pest problems can be sources of contamination of organic product.
- 75. Only list products you used that are prohibited under organic certification.

### **Section E Sanitation (COABC section 11.4, 11.15)**

76. Sanitation materials can contaminate both organic products and the environment. Choose sanitation products that do not leave residuals on food contact surfaces after rinsing. You are expected to use the least environmentally harmful product that will be effective.

77. If you use an outside contractor, the verification officer may wish to speak to him/her.

78. You must keep a log that or cleaning and rinsing procedures, so they can be verified. If equipment is used for both organic and non-organic products there must be documentation that it was cleaned and rinsed before the organic run.

79. This is to ensure that the cleaner does not get into the product.

80. Certain materials can also contaminate food.

81. Send in written procedures by email or mail.

### **Section F Record Keeping (COABC section 11.13, 2.6)**

Any time an organic product is moved, cleaned, processed, packaged or changed in any form, a document must be generated to record the activity.

82. An example of your finished product(s) lot or product codes(s) system(s).

83. If we pick up one of your products, will we be able to see documentation of the progression that connects the finished product to the raw ingredient or original product?

84. Part of verification is to make sure that there were enough organic inputs (ingredients, produce, and products) bought, to account for the organic products sold.

85. This is essential – status refers to organic or transitional. The name of your certifier should also be on your invoices.

86. A summary of this type is very useful when the verification officer is checking your audit trail.

87. Another Flow-Chart! This time we show you a list version:

#### **Audit document flow chart partial example**

##### **Buy product from producer**

Purchase Invoice

Copy or organic certificate or

Transaction Certificate

##### **Transportation**

Incoming BOL with producer's lot number

##### **Receiving Area**

Weight/Scale ticket

Receiving Report – internal lot # assigned

### **Section G Packaging and Labelling (COABC sections 11.1,11.8 through 11.10)**

88. This refers to any kind of packaging – not just retail. Answer yes even if you contract with another facility to do the packaging or if you move items from one container to another.

89. Tell us about every packaging facility you use.

90. Check ingredients even if you are shipping bulk to warehouses.

91. Check all boxes that apply.

92. If you are not sure, find out.

93. Find out right away.

94. The use of recyclable materials is an organic principle.

- 95. Returnable materials must be used where possible.
- 96. same
- 97. If you want to label the product as certified organic, read section 11.7, 11.8, 11.9, 11.10 for details.
- 98. This is very important. Labelling non-organic products as organic may be grounds for decertification.
- 99. If you combine lots from different producers or production runs how do you identify the containers?
- 100. It is a good idea to send in a sketch or a proof of the label before printing, so you avoid costs if you have to make changes.
- 101. If you are using the term British Columbia Certified Organic on the packaging, the certifier must approve the labelling **before** you market any products. There can be a hefty fine for misuse of that term.

## **Section H Waste Management**

- 102. They will have to be listed on your certificate.
- 103. Responsible waste management is an organic principle.
- 104. Most regulatory waste requirements protect the environment.

## **Section I Water and Steam (COABC 11.13, 11.15)**

- 105. Skip the section if you don't use water or steam
- 106. Mark your source of water.
- 107. Water in direct contact with products must be potable.
- 108. If your water is not from a municipal source, and it contacts the organic product your certifying body may want you to test the water if you have not already done so.
- 109. Please give as much detail as possible. If add anything to the water give as much information about the product as possible. The verification officer will want to see the label, product information sheet, or MSDS sheet of any products used.
- 110. Boiler additives can contaminate steam that in turn can contaminate the organic product if there is direct contact.
- 111. same
- 112. Conservation is a principle of organic production.

## **Section J Equipment (COABC section 11.4)**

- 113. If equipment is used for both non-organic and organic production it must be cleaned and rinsed or purged with organic product before the organic run.

## **Section K Quality Assurance (COABC section 11.1, 11)**

- 114. Quality assurance programs can be modified to include organic assurance.
- 115. Indicate if test either ingredients or finished product. This is not a requirement in most cases.
- 116. If you retain samples of ingredients or finished products explain the details.
- 117. If a problem with the organic integrity of the product is discovered, will you be able to recall it?
- 118. You can send attachments by email or mail. Diagrams, flow charts, and labels don't usually fax well. You may be able to scan labels and email them if the type and colours can be distinguished.