Introduction to Organic Processor/Handler Certification

Presented by NOFA-NY Certified Organic, LLC
Today’s workshop will cover:

- Certification Process
- Organic System Plan / Application
- Recordkeeping
- Diagrams & Organic Control Points
- Product Composition & Labeling Categories
- Ingredient Verification
- The “National List”
- Labels
- Co-packing & Private Labeling
- International Equivalencies
- Q & A
Annual Certification Process

1. **Submit complete application and fees**
2. **Initial review of your application**
3. **Requests clarification, lists the records to have ready for inspection.**
4. **Inspector assigned.**
5. **Inspection Day!**
6. **Inspection Report received back to the office**
7. **Certificate issued, pending further information, or denied if information not received**
8. **Decision Letter:**
   - Gives reminders, possible questions or items still needed before decision.
   - Identifies any areas of noncompliance, if applicable.
9. **Final Review and Certification Decision**
10. **Decision Letter:**
    - Gives reminders, possible questions or items still needed before decision.
    - Identifies any areas of noncompliance, if applicable.
11. **Certificate issued, pending further information, or denied if information not received**
Cost Share Program

Once you have been approved for organic certification:

• Can receive 75% of their annual certification fee per scope back, up to a maximum of $750 per year.
• Administered by New York State Department of Ag & Markets for NY producers. Fifteen other states also participate.
• Must get your certification application in by August 30th to be eligible that year.

It IS affordable to get certified!
Who can use the term “organic”?

• Must be certified operation to use:
  • 100% Organic
  • Organic
  • Made with Organic

• Exempt:
  • Gross sales under $5,000
  • Must follow NOP Standards
  • Must be willing to be audited

*Civil penalties for false representation*

Section 205.102
What is an Organic System Plan (OSP)?

The *living* document(s) of how you will manage your certified organic operation including every aspect of your production.

What is in a complete application?

- Master List of ingredients / suppliers
- Equipment List
- Cleaning & Sanitizing Materials List
- Pest Control Materials List
- Facility Diagrams
- Product flow chart
- Samples of All Record Keeping Documents
- Proposed Finished Product Labels
- Product Profiles
- Current NOP compliant organic certificate for each organic ingredient &/or processing aid
- Documentation of Ingredients form for each non-organic ingredient &/or processing aid
- SOPs (standard operating procedures) for internal procedures, product tracking, cleaning & sanitizing or pest control procedures
Recordkeeping: What is an Audit Trail?

- The ability to track product from origin to sale
- Readily available at inspection
- Must be kept for a minimum of 5 years

Section 205.103
Facility Diagram

- size and overall layout of the building
- placement of equipment
- processing areas
- storage areas
- shipping areas

Section 205.202
Flow Chart

Explains the process step-by-step, including:

- where product is received, stored, processed, packaged, warehoused
- where the organic ingredients are added or processing aids used
- Identify Organic Control Points (OCPs)
Organic Control Points (OCPs)

Points where organic products could lose integrity through contact with prohibited materials or by commingling with non-organic ingredients.

• Common OCPs include:
  • Storage of organic and non-organic ingredients in the same area
  • Use of same equipment for organic and non-organic production
  • Sanitation chemicals and procedures
  • Pest management
  • Packaging & Labeling
Product Composition

Section 205.301

(a) 100% Organic: All agricultural ingredients and processing aids must be certified organic.

(b) “Organic” (>95%): 95% of product must be certified organic agricultural products.

(c) “Made With Organic Ingredients”: At least 70% certified organic produced ingredients.

(d) <70% Organically Produced Ingredients: Only use “organic” on ingredient statement.
Product Composition - 100% Organic

• Products labeled as 100% organic must contain only 100% certified organic agricultural ingredients.

• All processing aids must be certified organic ingredients.

• All ingredients must be identified as 100% Organic on certificates.
Product Composition - “Organic”

- 5% must be:
  - Substances from 205.605
    - Non-organic agricultural products from 205.606 that are not commercially available in organic form.
    - No excluded methods, sewage sludge, or irradiation.
Product Composition - “Made with Organic [specified ingredients or food groups]”

- 70% Certified Organic Agricultural Products
- 30% may be any nonorganic agricultural ingredient / product produced without excluded methods, sewage sludge, or irradiation.
Calculating Percentage of Organic Ingredients

• Divide weight of organic ingredients by total weight (excluding water and salt).

• Use volume for fluid ingredients

• Round percentage of organic ingredients **DOWN** to a whole number.

**EXAMPLE:**
94.95% = 94%

*section 205.302*
## Ingredient Verification

### Organic Ingredients

- Must come with valid organic certificate (dated within 12 months of purchase)
- Labels from consumer ready retail items can be accepted if showing certification info and certifier
- If labeling as 100% Organic, ingredients must be listed as 100% Organic on certificates.

### Non-Organic Ingredients

- Must submit Documentation of Ingredients form
- Must be produced without excluded methods (GMOs), sewage sludge or irradiation
- Salt must be free of anti-caking agents such as Yellow Prussiate of Soda (YPs)
The “National List”

**Section 205.605:**
Nonagricultural (nonorganic) substances allowed as ingredients in processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”

- only in accordance with any restrictions specified.

**Section 205.606:**
Nonorganically produced agricultural products allowed as ingredients in processed products labeled as “organic.”

- only in accordance with any restrictions.
- only when the product is not commercially available as organic.
100% Organic and Organic product labels (section 205.303):

- May say “organic”
- May use USDA Seal (replicated as per 205.311 only)
- May display certifier logo (not more prominent than USDA seal)
- May make a percentage statement (must not exceed ½ the size of the largest type on the panel. Must be entirely the same type, style, size, and color, without highlighting.)
- Must include certification statement below distributor info
- Must identify all ingredients as organic

*Labels MUST be approved prior to use*
Labeling Requirements - Organic

See Sections 205.300 - 205.311 of the National Organic Standards for complete info on labels, labeling and market info.

My Organic Farm
999 Farmers Way
Anywhere NY 12345
Certified Organic by NOFA-NY, LLC

ORGANIC TOMATO SAUCE

NT. WT. __________

Ingredients: organic tomatoes, organic olive oil, organic basil, organic garlic, salt

The USDA seal may be used. If so, it must be displayed more prominently than other seals/marks and be used in the correct colors. (205.303(a)(5) & 205.311)

Certification statement must be located below the distributor info. (205.303(b)(2))

The term “organic” may be used to modify name of the product. (205.303(a)(1))

Organic ingredients must be identified with the word “organic”, or with an asterisk (see below), salt cannot be identified as organic. (205.303(b)(1))

tomatoes*, olive oil*, basil*, garlic*, salt
*organic

My Organic Farm

The “Certified organic by” NOFA-NY, LLC logo may be used as a certification statement under distributor info. Stickers available for purchase.

The certification statement may appear under logos as long as they contain the farm/distributor name.
Labeling Requirements section 205.304

“Made with Organic [specified ingredients or food groups]”

• Must not use the USDA Organic Seal
• Must not be labeled as Organic
• May list up to 3 organic ingredients or food groups: “Made with organic flour, sugar and spices”
• Must contain certification statement
• May use certifier logo
• May make a percentage statement (must not exceed ½ the size of the largest type on the panel. Must be entirely the same type, style, size, and color, without highlighting.)
• Must not include organic and non-organic forms of the same ingredient, when these ingredients and/or food groups, are listed within the “made with” statement.
Labeling Requirements  
section 205.305
Multi-ingredient packaged products with less than 70% Organic Ingredients

AKA Non-Organic Products

- No use of the term “organic” on primary display panel.
- May list organic ingredients on information panel.
- May not refer to ingredients as “certified.”
- No use of USDA or certifier seals.
Private Labels & Co-packing

- A “private label” operation is a company that does not produce or handle products, but has organic products packed and labeled for them under contract.

- Certification is optional – an excluded operation.

- Operations may contract with certified handlers (co-packers) to handle organic products.

- Co-packers must be certified organic operations.
International Trade

The NOP currently has organic equivalency agreements with:

- Canada
- European Union
- Japan
- Korea
- Switzerland

Organic product produced in any of the above may be represented as organic in the U.S. and vice versa

There are specific documentation requirements for exporting/importing organic products, be sure to contact us for details or visit the international section of the NOFA-NY website:

[www.nofany.org/certification/international-trade-agreements](http://www.nofany.org/certification/international-trade-agreements)

*Exclusions & special labeling requirements may apply.*
Thank you for coming to our workshop!

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Contact us with any questions!