

Handling Recommendations -- 1994

NATIONAL ORGANIC STANDARDS BOARD FINAL RECOMMENDATION ORGANIC HANDLING PLAN

Adopted: June 4, 1994
Location: Santa Fe, New Mexico

COMMENTARY

An Organic Handling Plan must be created by all organic handlers certified under the National Organic Program as required by the Organic Foods Production Act of 1990 (OFPA). "The term 'organic plan' means a plan of management of an organic farming or handling operation that has been agreed to by the producer or handler and the certifying agent and that includes written plans concerning all aspects of agricultural production or handling described in this title including crop rotation and other practices as required under this title." (OFPA Section 2103) "A producer or handler seeking certification under this title shall submit an organic plan to the certifying agent and the state organic certification program (if applicable), and such plan shall be reviewed by the certifying agent who shall determine if such a plan meets the requirements of the program." (OFPA Section 2114(a)) "An organic handling plan shall contain provisions designed to ensure that agricultural products that are sold or labeled as organically produced are produced and handled in a manner that is consistent with the purposes of this title." (OFPA Section 2114(e))

The N.O.S.B. thinks that the Organic Handling Plan is a key element for implementing the required standards for organic handlers as well as other desirable handling practices. The OFPA requires provisions in the handling plan to ensure practices that are consistent with the Act (Section 2114 (e)). The Board has included such provisions in Section I of the Organic Handling Plan Proposed Regulations. The Board has also included "ecologically sound waste management" as a desirable practice for organic handlers and has included this in Section II of the Organic Handling Plan Proposed Regulations. Desirable practices in Section II must be completed as part of the Organic Handling Plan but certification is not affected by compliance with the practices listed in Section II.

The Board believes that the Organic Handling Plan must be both practical and useful and must be applicable to all types of organic handlers (distributors, processors, packers, shippers, receivers, retailers who process, etc.). The Board sees the purpose of the Organic Handling Plan as being twofold: to assist the handler and to assist the certifying agent. For the handler, the Organic Handling Plan should provide a flexible, useful, and affordable tool for developing organic handling practices and an ecologically sound management system for the handling operation. The Organic Handling Plan should serve as a process for planning and evaluating management practices and for making tangible improvements to the handling operation. For the certifying agent, the Organic Handling Plan should provide essential information for assessing the handler's compliance with the OFPA.

As required by the OFPA, the Organic Handling Plan must be a written document that describes how the organic handling operation is managed. It must be written by the handler, agreed to by the certifying agent, and must be updated annually to reflect changes and improvements in handling operation management. The Committee thinks that the actual format of the Organic Handling Plan is best determined by the certifying agent.

In order to comply with the OFPA, the Organic Handling Plan must address all elements of organic handling including the handling that are applicable to a particular handling operation including the handling system description, procedures for assuring organic integrity, material inputs, the audit trail system, pest management, and waste management. The required components of the Organic Handling Plan are outlined in the "Proposed Regulations" that follow. In order to provide a practical example, the Board has also included a sample Organic Handling Plan in questionnaire format.

While the N.O.S.B. recognizes that the OFPA does not establish waste reduction requirements for organic handlers, the Committee has included a waste management section in the "Proposed Regulations." The Board thinks that organic handlers should establish waste reduction goals for their operations. By including a waste reduction section, the Organic Handling Plan can more thoroughly serve as a vehicle for the development of ecologically sound management practices for the handling operation.

ORGANIC HANDLING PLAN PROPOSED REGULATIONS

I. REQUIRED

The Organic Handling Plan (OHP) shall include the following components if they pertain to the specific handling operation or its agents, licensees, employees, contractors, and subcontractors who handle its organic products:

A. Organic Handling System Description

- (1) A general description of the handling operation, handling and/or processing procedures, and organic food(s) handled.
- (2) A schematic flow chart or written description showing the movement of organic food during handling and/or processing. All equipment, machinery, and storage areas used in handling and/or processing must be identified in the flow-chart.

B. Assurance of Organic Integrity

- (1) A description of the Hazard Analysis Critical Control Point (HACCP)* system or similar system for the handling operation which addresses the following areas of potential contamination (hazards) of the organic food:
 - (a) Co-mingling certified organic food with non-organic food;
 - (b) Containers and packaging;
 - (c) Sanitizer, boiler chemicals, processing aids, and prohibited substances;
 - (d) Transportation and storage;
 - (e) Pest control substances;
 - (f) Food spoilage microorganisms; and
 - (g) Prohibited handling and processing procedures.

* HACCP is a system by which food processors and importers can evaluate the kinds of hazards that could effect their products, institute controls necessary to keep these hazards from occurring, monitor the performance of these controls, and maintain records of this monitoring as a matter of routine practice.

(2) A list that identifies all known individuals or businesses that sell, transport, or store the products of the organic handling operation but do not hold legal title to such products.

(3) Documentation that all individuals and businesses that sell, transport, or store the products of the organic handling operation but do not hold legal title to such products have been informed in writing of the requirements of proper handling of organic products and of the possible exposure to federal civil penalties for violation thereof and that all such individuals and businesses affirm by signature on a bill of lading or other appropriate affidavit that they do not open, mix, combine or otherwise transform the organic products and that the organic integrity of the products are not compromised while in their custody.

C. Material Inputs

(1) A list of all certified organic ingredients and non-organic ingredients used including those used for curing and smoking.

(2) For each food labeled as an organic food that contains one or more non-organic agricultural products as ingredients, a written description of:

(a) the good faith efforts made to locate or develop a source of the certified organic form of the ingredient and

(b) the progress made over the previous years to eliminate non-organic agricultural products as ingredients.

(3) For each non-organic agricultural product used as an ingredient, a description of the reasons why the certified organic form of the ingredient is not used.

(4) A list of all processing aids used.

(5) A description of how water is used in the handling operation including the quality of the water used.

D. Audit Trail/Record Keeping System

A description of the system of internal record keeping that documents the movement of each specific lot of organic food through each step of the handling operation.

E. Pest Management

(1) A description of the pest problems encountered in the handling operation and of the pest monitoring techniques used.

(2) A description of the non-chemical pest control methods used in the handling operation.

(3) A description of the use of chemicals for controlling pests in the handling operation.

F. Livestock Care

- (1) A description of handling methods used to minimize livestock stress.
- (2) A description of arrangements made for feeding livestock that may be held at the packing plant for more than 24 hours.
- (3) A description of arrangements made for supplying livestock with fresh water while at the packing plant.

II. DESIRABLE PRACTICES

Waste Management

- (1) A description of efforts to reduce solid waste, liquid waste, and airborne emissions produced by the handling operation.
- (2) A description of recycling efforts, the use of recycled materials, and efforts to reduce packaging in the handling operation.

III. FORMAT

The format of the OHP shall be determined by the certifying agent.

ORGANIC HANDLING PLAN QUESTIONNAIRE (YEAR) (CERTIFYING AGENT)

PRODUCER NAME: _____

FARM NAME: _____

ADDRESS: _____

PHONE & FAX: _____

I. REQUIRED:

A. ORGANIC HANDLING SYSTEM DESCRIPTION

1. Describe your handling operation and your handling and/or processing procedures. Include a description of all equipment and machinery used.
2. Attach a schematic flow chart showing the movement of certified organic food during handling and processing. Show all equipment, machinery, and storage areas used from the time the certified organic food is received until it is shipped.

B. ASSURANCE OF ORGANIC INTEGRITY

1. Describe your Hazard Analysis Critical Control Point (HACCP) system for assuring the integrity of the certified organic food(s) handled in your operation. Include procedures used to assure that:

- (a) certified organic food is segregated from non-organic food;
- (b) containers and packaging do not contaminate certified organic food;
- (c) certified organic food does not come in contact with sanitizer, boiler chemicals, and prohibited substances;
- (d) contamination of the certified organic food does not occur during transportation or storage;
- (e) pest control substances do not come in contact with the certified organic food;
- (f) food spoilage microorganisms do not contaminate the certified organic food; and
- (g) prohibited handling and processing procedures are not used.

C. MATERIAL INPUTS

1. List all certified organic ingredients and all non-organic ingredients used in your handling operation.
2. Describe your verification procedures for documenting that the non-organic agricultural products you use as ingredients are not commercially available in certified organic form.
3. List all processing aids used in your handling operation.
4. Describe how water is used in your handling operation. Describe your water source and your water quality including the frequency and method of testing water quality.

D. AUDIT TRAIL/RECORD KEEPING SYSTEM

1. Describe your system of internal record keeping for documenting the movement of each specific lot of organic food through each step of your handling operation.
2. Describe your batch and/or lot numbering system and coding system.
3. Attach a sample set of audit trail documents.

E. PEST MANAGEMENT

1. Describe the pest problems you encounter in your handling operation.
2. Describe the pest monitoring techniques used and the non-chemical pest control methods you use.
3. Describe the use of chemicals for pest control in your handling operation.

F. LIVESTOCK CARE

1. A description of handling methods used to minimize livestock stress.

2. A description of arrangements made for feeding livestock that may be held at the packing plant for more than 24 hours.

3. A description of arrangements made for supplying livestock with fresh water while at the packing plant.

II. DESIRABLE:

A. WASTE MANAGEMENT

1. Briefly describe your efforts to reduce solid waste, liquid waste, and airborne emissions produced by your handling operation.

2. Briefly describe your recycling efforts, your use of recycled materials, and your efforts to reduce packaging in your handling operation.