

## **MOFGA Certification Services**

# **Guidelines for Organic Processing and Handling**

Processing is modification of raw agricultural products. Handling is selling, processing or packaging agricultural products. The NOP standard requires processors and handlers of organic products to be certified (with exemptions for retailers and distributors). Types of processing and handling covered under this section include:

- Milling (grain), freezing, chilling, dehydrating, drying, pickling, canning, preservation
- Fermenting (wine, cheese, yogurt, etc.), churning, pasteurizing
- Mixing, separating, combining ingredients to create new product (jams, spreads, syrups)
- Cooking, baking, curing, heating
- Pressing (cider or oil), extracting, distilling
- Slaughtering, grinding, eviscerating
- Packaging or repackaging

Please note that minimal modification as part of normal on-farm post harvest handling is permitted without processing certification. Minimal modification includes washing, filtering, cleaning, and trimming, bagging, boxing or labeling of produce. Please include all post harvest handling details in your organic handling plan.

Processors/handlers who are **not** primarily a farm must complete an Organic Handling Plan and include a product profile and label for each organic product. Farms with livestock and/or crops, who also process products, must also submit an Organic Handling Plan. If you are a certified livestock producer and also make organic pork sausage, your sausage is not automatically certified as part of your crop/livestock application.

### **PROCESSING FACILITY REQUIREMENTS**

1. All applicable state/federal licenses must be current and available at your inspection.
2. Water must meet State of Maine water quality standards. Water quality test results must be available at your inspection.
3. A processor may rent/share a processing facility as part of a contractual relationship. The following apply for contracted facilities:
  - A separate organic handling plan must be completed for each contracted facility, the applicant is responsible for organic compliance at each facility.
  - The applicant or designated representative must host the on-site inspection and is responsible for all record keeping.
  - Organic certification of a contracted facility only applies to products produced by the certified client. It does not imply certification of the entire facility or other products.

### **FACILITY PEST CONTROL**

#### **Required:**

1. Pest control inside processing facilities must be accomplished using practices and materials that adhere to the organic standards.
2. Preventive management practices, including but not limited to, removal of pest habitat, food sources, breeding areas, use of screens, etc., are required. Additional preventive methods include control of temperature, light, humidity, or other environmental factors.

#### **Permitted:**

1. Pests may be controlled by mechanical methods (traps) or by lures or repellants, provided the substances are on the National List. If these methods are not sufficient to control pests, materials approved for organic use may be used.

## MOFGA Certification Services

### Guidelines for Organic Processing and Handling

2. Additional pest control materials not consistent with the National List may be used if other methods have failed, provided that MCS reviews and approves the materials/methods before use, and there is no contact with organic ingredients or products.

#### FACILITY SANITATION

##### Required:

1. Materials used in direct contact with organic products, such as sanitizers in hydro-coolers or flume water must be permitted in section 205.605 of the rule.
2. All cleaning and sanitizing materials must be listed in the Organic Handling Plan along with the protocol(s) for their use.

##### Permitted:

1. Other approved materials may be used to clean food contact equipment provided the equipment is subject to an intervening rinse or purge event to prevent contamination.
2. Surfaces that are not in contact with organic products (floors, walls, drains, areas outside of production areas) may be cleaned with any material.

#### Use Of Chlorine Materials In Organic Handling

For *food handling* facilities and equipment, APPROVED chlorine materials may be used up to maximum label rates for disinfecting and sanitizing of food contact surfaces. Rinsing is not required unless mandated on the label. Water used as an ingredient must be potable. It can contain no more than 4ppm chlorine.

Water used in direct crop or food contact is permitted to contain chlorine levels approved by FDS or EPA (must document in organic system plan), however, rinsing with potable water (4ppm chlorine or less) MUST follow this step.

Please remember that all sanitizers and disinfectants need to meet the following MCS requirements: (1) Must be listed in your processing plan and approved by MCS prior to use, (2) Must be labeled for the intended commercial use, and, (3) Must be used according to label instructions.

We have had instances of certified processors using regular household bleach as a sanitizer. Regular bleach contains surfactants and/or fragrances that are not allowed in organic production and these bleaches are not labeled for sanitization. We do allow *Clorox Germicidal Bleach (EPA Reg. No. 5813-102)*, which is recommended by the University of Maine. It does not have these additional ingredients and it is labeled as a commercial sanitizer. Inexpensive chlorine test strips are available to check the strength of your chlorine solution before use (chlorine molecules are unstable). Please contact MCS if you have any questions or concerns about the use of chlorine materials.

**MOFGA Certification Services**  
**Guidelines for Organic Processing and Handling**

**PRODUCT FORMULATION / INGREDIENTS**

**Required:**

1. Certified organic agricultural ingredients. See below for details.
2. Water used as an ingredient must meet federal drinking water standard.

**Permitted:**

Permitted ingredients vary based on label category:

1. For products labeled as “100% Organic” all ingredients must be 100% organic and all processing aids must be certified organic.
2. Products labeled “Organic” must have a minimum of 95% organic agricultural ingredients by weight or fluid volume (excluding water & salt) and may also include:
  - Non-organic ingredients on the National List 205.605, according to any restrictions.
  - Non-organic agricultural ingredients listed in 205.606, provided records are kept to indicate lack of commercially available organic sources.
3. Products labeled “Made with Organic (specified ingredients or food groups)” must contain a minimum of 70% organic agricultural ingredients by weight or fluid volume (excluding water and salt). Other ingredients or processing aids may be:
  - Non-organic substances listed in 205.605 (according to any restrictions).
  - Non-organic agricultural ingredients produced using substances not on 205.605, however no excluded methods are allowed (see below).

Please refer to the National Organic Program Rule. See sections §205.105, §205.300-205.311, and §205.605-205.606.

**Not Permitted:**

1. Genetically engineered ingredients. Genetic engineering is an excluded method.
2. Ingredients made with the use of sewage sludge.
3. Ingredients treated with ionizing radiation.
4. Synthetic solvents used in or on a processed product or organic ingredient.
5. For products labeled “Organic” and “100% Organic” no sulfites, nitrates, or nitrites may be used, except sulfites may be used in wine labeled as “made with organic grapes”.
6. For products labeled “100% Organic” and “Organic”, use of nonorganic agricultural ingredients when organic ingredients are available.
7. Inclusion of non-organic and organic forms of the same ingredient.
8. Synthetic ingredients or materials except those permitted in The National List (205.605), or those used incidentally in formulating non-organic ingredients in products labeled as “Made with Organic Ingredients”.

**PROCESSING METHODS**

**Recommended:**

1. Processing should not excessively diminish the nutritional value of the food.

**Permitted:**

1. Drying, dehydrating, canning
2. Freezing, chilling, heating, cooking
3. Fermenting, pressing, distilling, pasteurizing
4. Smoking, curing, vacuum packing
5. Milling, cutting, mixing
6. Packaging, repackaging

## MOFGA Certification Services

### Guidelines for Organic Processing and Handling

#### Prohibited:

1. Irradiation (*FDA-approved ionizing radiation for food inspection (i.e. x-rays) is permitted, as is UV light for disinfection, and microwave radiation for cooking. Prohibited forms are described online at 21CFR 179.26).*

#### PACKAGING & HANDLING

##### Required:

1. All packaging must be free of fungicides, preservatives, fumigants, and contaminants.
2. Only FDA-approved materials may be used.
3. Lot numbers must appear on all products for tracability.
4. Certified organic ingredients must be traceable to a farm/field.

##### Recommended:

1. Use of new containers or packages.

##### Permitted:

1. Recycled containers must be properly cleaned, sanitized and labeled.

#### LABELING

##### REQUIRED:

1. Products must be labeled with the appropriate category - "100% Organic," "Organic," or "Made with Organic (*specified ingredients or food group(s)*)." Labels must be submitted to MCS for approval before printing.
2. Product labels must identify the certifier with the phrase "Certified Organic by MOFGA" on the information panel below the name/address of the handler or distributor.
3. Growers, wholesale distributors, parallel growers, or processors and growers selling crops bought from other growers, must label all products and maintain an audit trail.

#### USE OF THE USDA ORGANIC SEAL AND THE MOFGA CERTIFIED ORGANIC SEAL

##### Permitted:

1. The USDA seal may only be used on products labeled 100% Organic or Organic.
2. The MOFGA certified organic logo may be used on all three product/label types. The MOFGA logo must not be displayed more prominently than the USDA seal.



Figure 1. USDA Seal and MOFGA Certification Organic logo. A colored USDA Organic seal can be found on the NOP website: [www.ams.usda.gov/nop/](http://www.ams.usda.gov/nop/). The MOFGA logo can be downloaded from MCS website.

## MOFGA Certification Services

# Guidelines for Organic Processing and Handling

### Not Permitted:

1. The USDA seal must not be used on products labeled “Made with Organic...(specified ingredient(s)).” If a color version of the seal is used the colors may not be changed.

### LABELING OF LIVESTOCK FEED

Livestock feed is only eligible for labeling as “100% Organic” or “Organic”. See sections 205.237, 205.301(a), and 205.306 of the NOP rule for more information.

#### Required:

1. Labeling must comply with all Federal or State feed labeling requirements.
2. Label must state “Certified Organic by MOFGA” (or similar phrase) below the handler/distributor name on the information panel.

#### Recommended:

1. Livestock feed labels may display the following information:
  - The statement “100% Organic” or “Organic”, as appropriate.
  - Organic ingredients may be identified in the ingredients list, by use of the word “organic” or by use of an asterisk to identify organic ingredients.
  - The USDA seal.
  - The MOFGA organic logo, which cannot be more prominent than the USDA seal.

#### Prohibited:

1. Use of nonorganic agricultural ingredients.
2. Use of any feed additives or supplements that are not listed in NOP §205.603(c-d).

### RECORDS

All aspects of organic production must be verifiable with records. Purchase, production and sales records are all necessary. Standard operating protocols for processing, cleaning, and pest control must be written and available for employees. Written logs documenting cleaning and pest control should be established. Documentation for purchased ingredients must include quantity and date of purchase, lot number and certification status. Current organic certificates for all purchased certified ingredients need to be available for inspection (computer files are fine).

Your inspector must be able to complete both trace-back and mass balance audits for all organic ingredients and products. A trace-back audit verifies that records are sufficient to track organic products and ingredients from time of purchase/production through to final sale. To conduct this audit, the inspector will choose a lot number from a finished product and will trace the product back to its date of production and to the source of all ingredients used in the product. Please make sure that all necessary records and lot numbers are in place to support a trace-back audit.

A mass balance audit verifies that sufficient quantities of organic product and ingredients are produced or purchased in order to account for all organic product sold. To conduct this audit, your inspector will examine purchase invoices and production records to verify quantities of organic ingredients purchased or produced. Using your batch records and product profiles, the inspector will calculate the quantity of ingredients used in processing. The inspector then compares the quantity of ingredients purchased or produced with the quantity of finished product produced and sold, plus any still in inventory. Please make sure that all necessary records are in place to support a mass balance audit.

## MOFGA Certification Services

### Guidelines for Organic Processing and Handling

Examples of audit-trail records include receiving records (purchase invoices, storage records for ingredients), processing records (production or batch records, storage records for finished products), and sales records (sales invoices, pick up invoices, and total sales on an annual or quarterly basis).

#### Lot numbers

The ability to track products and ingredients through handling and processing is vital to assure product quality. Using lot numbers to track products and ingredients allows for a successful audit trail. Each ingredient received should be assigned a lot number, which can be as simple as a date plus product name. Any time organic ingredients are combined or blended, a new lot number must be assigned. For example, if you were making jam, you would record the lot numbers of the sugar, pectin and other ingredients as they were received. A new lot number is then assigned to the finished jam. If an ingredient is purchased from several sources, the production or batch record should list the source and lot number of that ingredient. Lot numbers can be used to facilitate a product recall if there is a complaint or a food safety issue after a product is produced and/or sold.

#### OPERATIONS THAT ALSO PROCESS NON-ORGANIC PRODUCT

It is possible to certify a processing facility that makes both organic and conventional products. Such operations need to have accurate records of all inventory, separate or clearly marked storage areas for organic ingredients and products, and procedures that prevent contamination or commingling of the organic product as well as all ingredients.