Processing

Ensuring Product Integrity Through Organic Critical Control Points

By Bill Wolf and Sandy Mays

The USDA certified organic seal celebrated its fifth birthday this past October and more and more processors are obtaining organic certification to meet the surging demand. With this growth comes the need for better strategies to assure the integrity of products bearing the organic brand. The use of Organic Critical Control Points (OCCPs) is emerging as a useful tool for every type of producer and handler to make their Organic System Plans (OSP) more secure and effective.

Under the USDA National Organic Program (NOP) every producer and handler must have an OSP in place that documents how compliance with the regulations is accomplished. This is required in order to obtain and maintain organic certification. (See "National Organic Program Regulations" on page 28.) Many certified producers and processors legally meet this by completing the certification application of their Accredited Certification Agency (ACA), however, this is not a substitute for a separate written, detailed OSP.

The OSP is to organic certification what the Hazard Analysis and Critical Control Point (HACCP) program is to food safety and the concept behind OCCPs is similar to that of the critical control points within a HACCP plan. With HACCP, these control points are essential components of food safety and quality management plans that identify the places where contamination can occur and define the requirements to protect against these risks. These points provide the detailed roadmap for training personnel and continuously monitoring product integrity.

Like CCPs in a HACCP plan, OCCPs take OSPs to the next level of organic security by creating specific approval steps or gateway protocols that must be completed at each level—ensuring that your products meet organic standards and are properly labeled, certified and handled.

Each type of organic operator along the supply chain has very different issues that must be identified and addressed in order to install OCCPs at these potentially vulnerable weak points, but there are some requirements common to every organic processor. For instance, every handler's product flow begins with the receiving of certified organic ingredients into the facility.

OCCPs in Handling

An example of one of the first OCCPs that should be in place when goods are being received is the confirmation of the organic status of each ingredient. Requirements of this OCCP might look like:

OCCP 1: Confirm Organic Status. Facility must have on file a current organic certificate and certified product list from each ingredient supplier for every organic ingredient being received. The certificate must confirm certification to the USDA NOP. Incoming raw ingredients are quarantined and not accepted into live inventory until this condition is met. (See "Organic Handler Flow Chart" on page 30 for an example of how this control point is incorporated.)

OCCP 3: "No co-mingling of non-organic ingredients" is another critical control point commonly identified in the initial handling and storage of raw ingredients. When there are not adequate control points or training in place regarding this essential step it can

result in costly mistakes. One company, for example, had the same organic and non-organic ingredients stored next to each other with no segregation or delineating signage. There were no OCCPs in place and the company had not offered much training about the

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organic regulations and their purpose. This led to disaster when a few bags of the non-organic ingredient were pulled and added to a cook tank during an organic run. The entire production batch had to be diverted to non-organic product and sold as conventional at a loss of over $15,000. Adding insult to injury, the processor could not run the original order because the botched production run had used up key organic ingredients that were in short supply. Orders for that item could not be filled for 90 days and key customers were nearly lost. If proper OCCPs and a staff training program had been in place, it is highly unlikely that this would have happened.

OCCP 6: "No contamination with prohibited pesticides," which is a requirement of both raw ingredients and packaging materials, is another one to include in your plan. A snack food company introduced a line of certified organic products and everything was going well until they had to fumigate the storage warehouse. All organic products were removed to cold storage before fogging. However, due to an oversight by untrained personnel without an organic roadmap, all of the corrugated packaging used for their organic products was contaminated by the insecticide and could no longer be used, again costing thousands of dollars and production delays.

The potential risk of contamination or co-mingling of organic product with conventional in the supply chain can be greatly reduced with OCCPs, especially considering that a vast majority of organic handlers also process or store non-organic products. For example, a produce distributor now maintains an OCCP that requires conventional product never be stored above organic product. They learned this the hard way, when pallets of fresh organic berries were contaminated by moisture from conventional produce that dripped down onto the certified product.

OCCPs in Labeling

Organic labeling review and compliance is another area where OCCPs can save money and grief. Here are two recent cases we encountered where investing in proper control points would have paid dividends:

- A dry goods manufacturer printed organic product labels prior to our review and without approval of their Organic Compliance Officer. The USDA seal was the wrong color, the certifier seal was

National Organic Program Regulations (USDA NOP 7 CFR 205)

Subpart C-Organic Production and Handling Requirements

§ 205.201: Organic production and handling system plan

(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:

(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;

(2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;

(3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented;

(4) A description of the recordkeeping system implemented to comply with the requirements established in §205.103;

(5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and

(6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.

(b) A producer may substitute a plan prepared to meet the requirements of another Federal, State, or local government regulatory program for the organic system plan: Provided, That, the submitted plan meets all the requirements of this subpart.

too prominent and the ACA statement was not properly placed. Nearly $20,000 worth of labels had to be destroyed.

- Another company printed labels that were out of compliance with the recently revised 205.606 commercial availability regulations. Because they didn't have an OCCP in place that required them to check labels with their compliance officer prior to printing, it cost the company nearly $22,000.

Integrating OCCPs

If this sounds complicated and hard to implement, it does not need to be. Well-designed OCCPs should align with your current systems and-procedures and can help your business run more smoothly. It should not be a burden, but rather a strategic and powerful roadmap to improve process flow and act as a control and training tool.

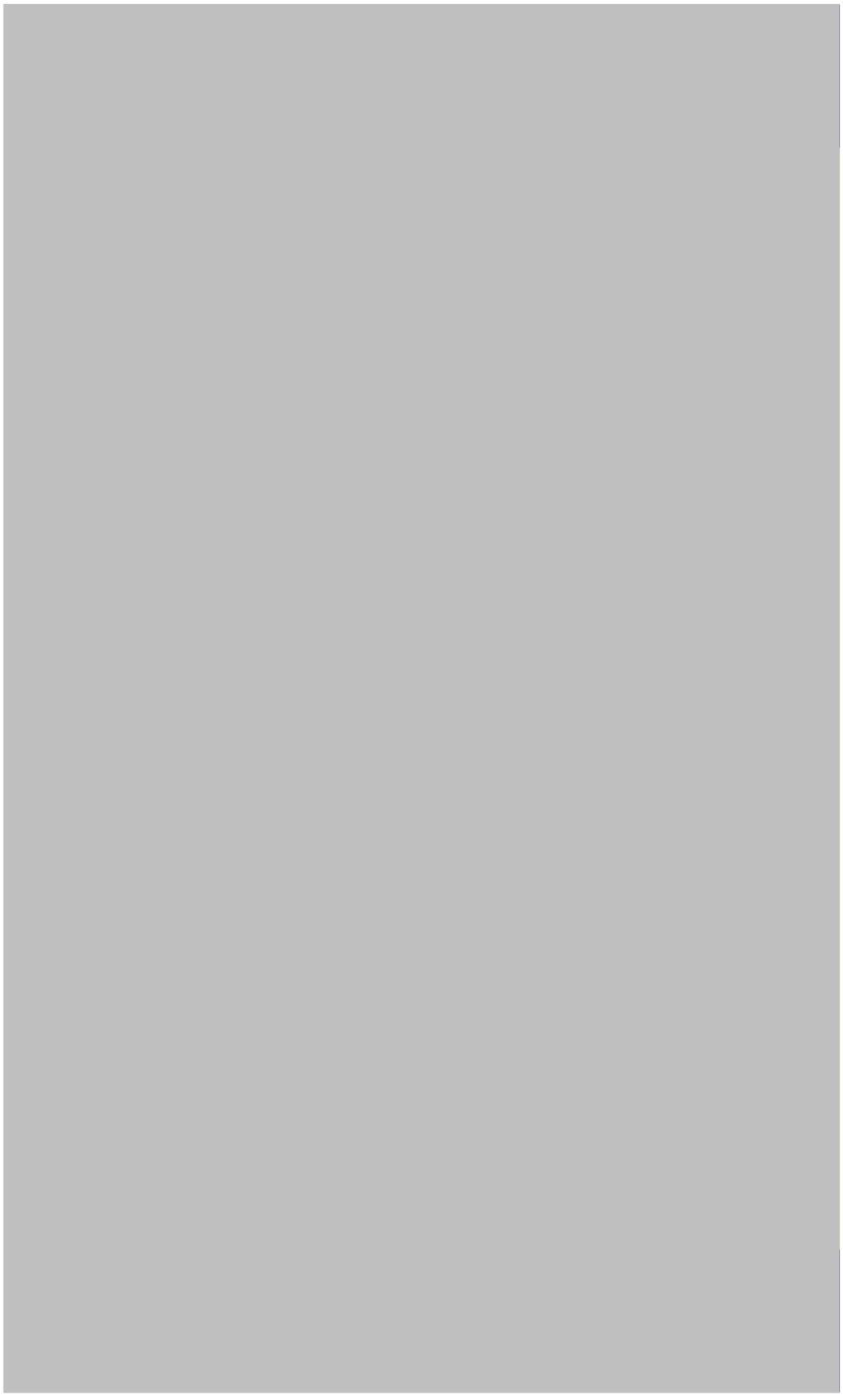
The starting point we use when developing OCCPs is to evaluate the current internal systems such as HACCP and other operating and record-keeping procedures including pest control, sanitation and recall programs.

The next step is to identify the OCCPs and align these additional requirements of organic production or handling with existing systems.

In our experience, when a handler reviews their operation and implements a strategically integrated organic system plan with OCCPs, they often find a number of areas where they can improve their operations, save money, reduce costs and permanently imbed continuous improvement into the thinking of the organization.

Nicole Dawes, president of Late July Snacks affirms this principle. "Investing in a well-designed organic plan has paid for itself many times over in reduced compliance and related costs and better control over our organic production procedures."

Having OCCPs is likely to improve your recall response capacity, provide a basis for compliance with the new FDA bio-security regulations, reduce the risk of accepting incorrect goods or producing products that are not to specifications. OCCPs can also reduce the use of pesticides by strengthening prevention strategies and reducing or eliminating the use of toxic pesticides, which will not only benefit employees and the organic products, but also positively affect the non-organic products being processed.



OCCP Successes

This method is working for a wide range of companies from small farms to large, multi-site co-packers and OCCPs, like control points in a HACCP plan, are reducing risk and systematizing procedures. Properly implemented OCCPs can help you avoid continuously facing regulatory compliance hassles with your certifier, your customers, and even your vendors.

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For example, Wizard's Cauldron is currently updating their OSP in order to further tighten their quality assurance program. As the largest custom processor of certified organic salad dressings and sauces in the United States, Wizard's Cauldron maintains organic compliance procedures for several production lines, a complex inventory of organic raw ingredients from numerous suppliers, and hundreds of finished product formulations that must match the product labels they maintain for their clients.

Wizard's Cauldron is growing rapidly and hiring new staff to meet the increasing demand for their products.

Cecilia Redding, CEO of Wizard's Cauldron said, "Having a robust, integrated OSP with working OCCPs in place, together with the training modules to support our OSP is a crucial part of our strategic plan to better serve our customers."

OCCPs can provide unforeseen guidance to companies that are adding organic lines.

"Having worked in our facility for years and being more than familiar with HACCP, I was surprised to find there could be even more critical control points specifically geared toward organic production," said Jay Campagna, director of quality at Garden Fresh Salsa.

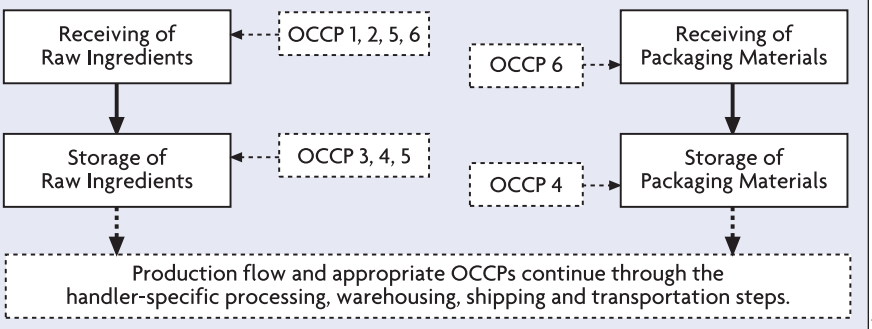
"Organic CCP issues such as the co-mingling of organic and non-organic ingredients and the use of prohibited processing aids affect the facility overall, not just an individual person in a specific job," he said.

"We've learned to take a second and third look at the production process using OCCPs. For instance, we've replaced a food-grade valve lubricant with a certified organic lubricant in an effort to make sure anything that may come into contact with our organic salsas meet our OCCP specs."

Ensuring the Best Results from OCCPs

Even after your OSP and OCCPs are in place, they should be reviewed periodically and updated when you make changes to your operation such

ORGANIC HANDLER FLOW CHART WITH ORGANIC CRITICAL CONTROL POINTS (OCCPs)
(INGREDIENT RECEIVING PORTION)



ORGANIC CRITICAL CONTROL POINTS (OCCPs)

1. Confirmation of organic status–organic certificates
2. Identity Preservation (IP) – Lot # tracking and recording
3. No co-mingling with non-organic ingredients
4. No contamination with prohibited pesticides
5. Proper segregation and protection during storage
6. No contamination during transport

EXAMPLE OF AN ORGANIC CRITICAL CONTROL POINT.

OCCP 1 – Confirmation of the organic status of raw ingredients.

Facility must have on file a current organic certificate and product list from each ingredient supplier for every organic ingredient being received. The certificate must confirm certification to the USDA NOP. Incoming raw ingredients are quarantined and not accepted into live inventory until this condition is met.

as adding an additional processing line, product line or facilities. They should also be reviewed for updates when preparing for your annual inspection by your ACA. Any non-compliance that was identified from the previous ACA inspection should have been addressed and incorporated into the OSP.

Training is also a key part of OCCPs. Having your staff trained about what organic means, where the organic value was created and what is required to maintain that value as well as how to comply with organic regulations will make your operation run much more smoothly.

If everyone understands why they are doing what they are doing, they are more likely to do their jobs better and enjoy coming to work as well. And, like the OSP, an organic training program is also required under the federal law.

True Organic Security

Overall, successful organic processors treat organic certification as more than just regulatory compliance. Having a written plan that is separate from a certifier's application is a good strategic tool. By implementing a complete OSP that includes and specifies OCCPs, you are protecting the integrity of your company while making the operation more efficient and profitable as well as reducing risk. □

Bill Wolf is president of Wolf, DiMatteo + Associates, which delivers strategic expertise to organic, socially and environmentally responsible organizations on issues including organic system plan design and implementation, policy advice, sourcing support and organic regulatory compliance (U.S., Canada and globally). Wolf has over 35 years experience in nearly every aspect of the organic industry, from farming to food processing. He has successfully helped launch a range of products from fertilizers and pest controls to organic packaged and fresh foods to personal care products. Wolf has served as president of OTA and OMRI, and as an advisor to numerous companies and government agencies, including the USDA. You can contact him at BWolf@OrganicSpecialists.com.

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