



TS27(EC)V03en_Processors handlers importers

PROCESSORS, HANDLERS & IMPORTERS

Guidelines n°27:

Rules on processing, handling and importing organic products

according to Ecocert Organic Standard (EOS)

These guidelines apply to control, traceability and process conformity demands.

With regards to rules on composition and labelling of processed products, please refer to specific Guidelines (n°26 feed, n°30 composition of processed foods, n°31 labelling of foods). Specific Guidelines on subcontracted activities (n°28) and exportation to EU (n°29) are also available.



I. Introduction

A. Scope

Organic products eligible for certification according to EOS are as follows :

1. Live or unprocessed agricultural products :

- ✓ Plants including wild collection and vegetative propagating material and seeds for cultivation
- ✓ Collected or farmed seaweed
- ✓ Livestock species : bovine, equidae, porcine, caprine, ovine, laying hens, fattening poultry (broilers, ducks, geese, turkey, guinea fowl)
- ✓ Bees
- ✓ Aquaculture animals : fish, molluscs, echinoderms, crustaceans (penaeid shrimps and freshwater prawns)

Products obtained by wild hunting or wild fishing are not eligible for organic certification.

Products not resulting through agricultural production methods are not eligible for organic certification; for example, this principle applies to water or salt.

In the same way, beeswax is not considered as a product of agricultural origin, it may not be certified as a « product from organic farming ». However an Attestation of Compliance may be issued for beeswax, stating « from organic beekeeping » or « suitable for organic farming ».

2. Processed agricultural products for use as food

The end-use of processed products, i.e. for human food consumption, is the main factor to determine whether the product is eligible for organic certification or not. Thus, cosmetics, textile and building material do not qualify for organic certification as per EOS.



3. Unprocessed or processed agricultural products and nutritional supplements for use as feed for cattle or aquaculture animals

B. Operators concerned by the Standard :

Operators involved in activities at any stage of production, preparation and distribution of organic products according to EOS shall:

- register their company/operations with Ecocert SA (one physical inspection per year + one non-mandatory random spot check + non-mandatory collection of samples for analysis)

Operators concerned by the standard are:

- ✓ Producers (animals, plants, plants wild collection and seaweed)
- ✓ Transformers (including re-packaging, re-labelling and storage) + subcontracted activities
- ✓ Distributors
- ✓ NB : If the operations are located over multiple facilities for the manufacturing or storage of the goods, every single facility shall be inspected. In the same way, if operators subcontract part of the manufacturing of the goods to a third party service provider, the latter has to be inspected as well (please refer to Guidelines on subcontracted activities n°28 for further details).

II. Process and implementation

A. General rules

EOS does not provide a detailed list of authorised and unauthorised processes. However a few items have been clearly identified as malpractices with regards to organic certification:

- ✓ **The use of ionising radiation** for the treatment of organic food, animal feed or raw materials used in organic food or animal feed.
- ✓ **The use of GMOs** and products produced from or by GMOs as food, feed, ingredients, processing aids and micro-organisms.



- ✓ The use of substances and techniques restoring product quality that has been lost through processing and storage of organic food and feed, or even through negligence in the processing of the products (e.g. : nanotechnology)

As a general rule, operators shall:

- ✓ Take all precautionary measures to prevent comingling by unauthorised substances or products
- ✓ Implement suitable cleaning measures, monitor their effectiveness and record these operations
- ✓ Ensure that non-organic products are not marketed with a statement referring to organic production
- ✓ Be able to provide Ecocert SA with updated records of all operations and quantities processed (manufacturing factsheet)

B. Mixed operations

When both non-organic and organic products are prepared, packaged or stored in the same facility, then operators shall:

- ✓ Separate by place or time organic operations from similar operations performed on non-organic products (ibid. for storage of raw materials and finished products).
- ✓ Take necessary measures to ensure identification of lots (traceability)
- ✓ Carry out operations on organic products only after complete emptying and suitable cleaning of the production equipment (if a full clean out of the equipment cannot be achieved in between organic and non-organic production, the first production runs must be downgraded to non-organic)

NB : For processors and distributors, EOS does not provide a restrictive list of products for cleaning and sanitisation (this type of list may be found only for breeders and aquaculture farmers). Therefore, general legislation on food processing applies.



III. Transport of organic products

A. Bulk collection of products and transportation to production and preparation units

Simultaneous collection of organic and non-organic products may be allowed provided:

- ✓ Appropriate measures are taken to prevent any possible mixture or exchange and to ensure the identification of the organic products
- ✓ Operator keep a record of the information relating to collection days, hours, circuit and date and time of reception of the products available to Ecocert SA.

B. Packaging and transport of products to other operators or units

Organic products must be carried in packaging, containers or vehicles closed and provided with a label stating the following details:

- ✓ Name and address of the operator
- ✓ Name of the product
- ✓ Reference to the organic production method
- ✓ Name of the control body
- ✓ Lot identification mark if necessary

IV. Checking guarantees

A. Reception of organic raw materials

On receipt of an organic product, operators must check the closing of the packaging or container and the presence of the identification label as mentioned above.

Operators must also crosscheck the information on the label and the information on the accompanying documents (bill of lading, delivery note, packing list etc.).



B. Documents to be kept

Operators must check the compliance of all the inputs used for the manufacturing of their organic products, record practices and keep the related documents available to Ecocert SA.

1. Documentary evidence

- ✓ Certification documents (and operating license if necessary) within validity period for all suppliers of organic raw materials. Buyers must check that the certificate provided by the vendor refers to the product actually purchased)

Different certifications are recognised equivalent for the purpose of the certification according to EOS of an organic product dedicated to the EU organic market. For further details, please refer to Guidelines N° 29.

- ✓ For exportation to EU, copies of certificates of inspection (accompanying each delivery).
- ✓ Attestation of compliance for subcontracted activities
- ✓ Technical sheets for all ingredients of non agricultural origin (additives, processing aids, preparations of micro-organisms and enzymes, natural flavour, ...)
- ✓ "GMO-free" attestation if necessary
- ✓ Analysis reports proving that the water is of drinking quality.

2. Documentary accounts

- ✓ Purchase orders, invoices and delivery receipts with reference to organic certification for the related products
- ✓ Records of periodic stocktaking of raw materials and finished products
- ✓ Sales invoices of organic products otherwise sales statistics with identification of the consignees

These documents shall enable Ecocert SA to realise balances and to cross-refer input and the output.

3. Other documents

- ✓ Manufacturing sheets if necessary
- ✓ Records of input (registering the results of the compliance check on receipt of organic products)



- ✓ Cleaning records if necessary

When in doubt on the organic origin of a produced or received product, operators must advise Ecocert SA immediately and either downgrade the related product to non-organic, or stop production until any doubt may be cleared.

V. Definitions

Operator :

Means the natural or legal person responsible for ensuring that the requirements of the standard are met within the organic business under their control.

Distributor :

Means the natural or legal person who buys and resells, on a B2B basis, bulk or pre-packaged agricultural products without modification of the content or the packaging (i.e. no re-packaging or re-labelling).

Importer :

Means the natural or legal person within the European Community who presents a consignment for release for free circulation into the European Community, either in person or through a representative .

Preparation :

Means the operations of preserving and/or processing of organic products (including slaughter and cutting for livestock products) and also packaging, labelling and/or alterations made to the labelling concerning the organic production method.

Subcontractor :

Means the natural or legal person who carries out operations on organic products on behalf of a financial backer without being the actual buyer of the organic raw materials. A subcontractor may only be responsible for the processing and charges only for the processing services provided.



VI. References and EOS

- I.(2) – Scope
- III.1 – Prohibited use of GMOs
- III.2 – Prohibited use of ionising radiation
- II.5, V.(B) – General rules on the production of processed feed
- II.4, V.(C) – General rules on the production of processed food
- I.(3) – Control system : operators concerned by the standard
- V.(A) – General rules : process and equipment
- VI.(A).1 – Collection and transport
- VI.(A).2 – Packaging and transport
- VI.(A).4 – Checking guarantees at reception
- VI.(B) – Storage of products
- VIII.(A) & (B) – General requirements for control
- VIII.(K).2 – Measures to be taken in case of doubt on the origin

These documents are available upon request to ECOCERT or may be downloaded from our website www.ecocert.com.

