

the SA Certification guide for international organic food processors



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1 Introduction

- 1.1 Introducing the Soil Association standards
- 1.2 Who needs to be licensed?
- 1.3 Why certify with us?

2 The certification process

- 2.1 How to become licensed with us – the application process
- 2.2 How do I make sure that my products are legally organic?
- 2.3 Labelling your products
- 2.4 What records do I need to keep?

3 The inspection

- 3.1 Preparing for your inspection
- 3.2 What will we check for at the inspection?
- 3.3 What happens after inspection?
- 3.4 The rest of the licensing year

4 Where do I go from here?

- 4.1 How SA Certification's business development team can help

1. Introduction

1.1. Introducing the Soil Association standards

The Soil Association has been developing standards since 1967, covering both the European Regulation and the Advisory Committee on Organic Standards (ACOS) compendium. In some areas the Soil Association standards exceed these requirements, particularly in areas of animal welfare.

Soil Association Certification Ltd (SA Certification) is a wholly owned subsidiary of the Soil Association. We are accredited by United Kingdom Accreditation Services (UKAS) to ISO65/EN45011 and International Federation of Organic Agricultural Movements (IFOAM) requirements.

Since June 1991, EC Regulation 2092/91 (for crops) and EC Regulation 1084/99 (for livestock) has defined the way organic animals and crops are farmed and grown. It also states how organic food must be processed to be legally sold as organic. The regulation was introduced to provide a base-line standard for the production of organic food throughout the EU and help protect the general public from false organic claims.

In the UK, the Department for Environment, Food and Rural Affairs (Defra) interprets this regulation as the ACOS compendium, which is the baseline standard for organic food production in the UK. ACOS approve certification bodies to inspect and certify companies to produce and process organic products. If you want to label and market your products as organic, an approved certification body must licence your business, and your products must meet these legal standards.

Our standards department develops the Soil Association standards as the scope for organic certification expands. We now have standards that include textiles, health & beauty, aquaculture and ethical trade. This is a continual, innovative process that ensures the Soil Association remains at the forefront of developing the organic market.

1.2. Who needs to be licensed?

The EC Regulation states you need to be licensed by a registered certification body, such as SA Certification, to market your products as organic if they are processed out of sight of the end customer. The term 'processing' includes manufacturing, packing and re-packing, labelling and re-labelling organic products. This covers (but is not limited to) the following types of companies:

- manufacturers of organic products
- retailers*
- packers, wholesalers and distributors who break down and pack, re-pack, re-label or process bulk materials
- packers and re-packers of organic fruit, vegetables and other foods
- animal feed mills*
- seed houses

*We have produced specific guides for these types of companies – please contact us for a copy if this applies to you.

If you are not sure whether your business needs to be licensed, please contact the business development team on t: +44 117 914 2407 and we will be happy to discuss this.

1.3. Why certify with us?

We believe the major benefits for choosing us as your certification body include:

- **Use of the Soil Association symbol on your products** – the Soil Association symbol is recognised by consumers as the mark of organic integrity and is often demanded by retailers.
- **Effective and efficient certification and inspection** – our technical staff and inspectors have extensive practical experience of the organic and non-organic food industry. Our inspectors are employed directly by SA Certification, and are not paid by the number of inspections they carry out. This is your guarantee of quality and integrity of service.
- **Guaranteeing product integrity** – we provide organic authenticity from plough to plate in order to maintain consumers’ trust and confidence in the organic market. We aim to provide the most robust and rigorous inspection and certification service.
- **Not for profit** - any financial surplus made by SA Certification is gift aided to the Soil Association charity to help continue their work. The Soil Association promotes organic food and farming to the consumer through marketing, events and education work. The network of organic demonstration farms is just one way in which awareness and understanding are built. Being certified by SA Certification means you are a driving force in the development of your market.
- **Marketing initiatives** - the Soil Association charity gives you the opportunity to link into their marketing initiatives through events, product showcases, sponsorship and Organic Week promotional activities. We can also assist you in marketing your products through our unique product sourcing database, www.soilassociation.org/sourcemarketplace.
- **Synchronised inspections** - we are accredited through our partnership with PAI (Product Authentication International) for inspection and certification to the British Retail Consortium (BRC) standard. This may be a requirement if you are supplying the multiple retailers. We offer competitive rates and the added convenience of combining your annual organic and BRC inspections.
- **Meeting your customers needs** – we can inspect and manage the certification of your organic lines to the United States’ National Organic Program (NOP), essential if you are developing an export market to the United States. We also offer an IFOAM accredited certification programme, inspecting and certifying to the IFOAM standards. We are also piloting our ethical trade scheme, please contact us for more information.
- **Our accreditation** - SA Certification has achieved a number of quality control accreditations for certification. We were the first UK Organic Certification Body to gain UKAS accreditation to EN45011. Accreditation to the EN Standard 45011 ensures that certification bodies provide fair, independent and consistent certification to their customers.

2. The certification process

2.1. How to become licensed with us - the application process

If you are interested in becoming certified with us, and you haven't done so already, then contact the business development team on +44 117 914 2407 to order your application pack. The pack costs £35 (EU), £40 (rest of the world), including postage/packing. Payment can be made by credit or debit card, cheque, bank transfer or invoice.

The application pack contains the Soil Association organic standards, application forms and guides. You need to complete the application form to tell us about your company and fill in a specification form for each product that you want certified as organic. Then send these to us with your application fee.

We will then contact you to arrange a time to inspect your premises. Afterwards you will be issued a compliance form that will explain if there is any further information or action that we require from you.

We advise that you allow around 16-20 weeks from the date our office receives your application to issuing the certification decision. This is dependent on the amount and clarity of the information received. The process is helped if good communications can be maintained with the SA Certification office. It is essential to provide us with reliable fax and/or email details. It is also important that applicants/licensees understand English. SA Certification material will be provided in English, including our standards.

If you are acting as a co-ordinator for a group, please ensure that translations are communicated to all non-English speaking group members. If language is a challenge, you may appoint an English-speaking third party to liaise with us and correspond on your behalf. Please note you cannot sell your products as organic until you have received your certificate and trading schedule.

2.2. How do I make sure that my products are legally organic?

A minimum 95% of the ingredients from agricultural origin (i.e. originally derived from animals and plants) in the product must be certified as organic to label it as 'organic'.

You may use up to 5% non-organic ingredients of agricultural origin in your products. You may use some ingredients of non-agricultural origin such as yeast, water, and salt. Some additives and processing aids are also permitted. These are all listed in the Soil Association standards.

What you need to tell us about your products

You need to complete and send us a specification sheet that lists the ingredient(s) for each product that you wish to have certified. There are two types of specification sheets:

- i) *Single ingredient product specification form* – for single ingredient products which you pack, process, label or without adding other ingredients. Processing aids may be used. For example bottling milk, packing fruit or cutting and packing meat.
- ii) *Multi-ingredient product specification form* – for each product that contains more than one ingredient. For example, tomato sauces or bread.

Natural flavouring declaration

If any of your products contain natural flavourings, which have not been organically certified, then you need to submit a *natural flavouring declaration* signed by your flavouring supplier. This is to declare that the

flavouring is legally defined as a natural flavour and is suspended in an approved carrier. We include a template of this form in the application pack for your use.

Non Genetically Modified Organism (GMO) declaration

For any non-organic ingredients in your product (permitted under the Soil Association standards) you will need to arrange for your supplier of these ingredients to sign a declaration, confirming that these ingredients are from a non-GMO source. We include a template of this form in the application pack for your use.

We have concluded that in some ingredients and processing aids there is no risk of GMO inclusions. We do not require a non-GMO declaration for these. These are detailed on the non-GMO declaration form.

We continue to review the requirements for GMO declarations for other ingredients. We will inform all our licensees about this via our newsletters and Certification News.

2.3. Labelling your products

Before marketing your products as organic, you need to have written approval from us that your labels comply to our standards.

The full labelling requirements are covered in the Soil Association standards and are summarised within our labelling guidelines (ref. P093fm).

2.4. What records do I need to keep?

There are no set formats for record keeping, but the inspector must be able to audit them fully. We have produced some templates for record keeping, please contact us if you would like copies. The types of records that you need to keep include the following. For full requirements of record keeping you must refer to the Soil Association standards.

- Goods in records – these must show that you have checked that all organic ingredients are certified organic on delivery. This must include delivery dates, quantities of all ingredients received, supplier name and a traceability code.
- Sales and goods out records – to show dates and quantities of all products that you sell, including sales invoices and delivery notes. Summaries are required to reconcile with ingredients that have been bought, ensuring that organic ingredients have not accidentally been substituted with non-organic ingredients.
- Production records – to show the ingredient usage for each production run, demonstrating full traceability through to dispatched product. This includes date, traceability code and quantity of product made. Waste will need to be recorded as part of the process.
- All product specification sheets must be kept on file (copies of those sent to SA Certification, and in your own company format if used). For example, derogations for non-organic ingredients, Non-GMO declarations, flavouring declarations. We recommend that you hold on file copies of your organic licensed supplier's certificates.
- Stock record – this must be recorded at least once every 12 months; and demonstrate raw material usage over set periods.
- If you are exporting to the UK or the EU you must also hold the relevant certification documents for these ingredients. This includes a copy of the Certificate of Inspection (COI), import authorisation (OB8) from

Defra (if applicable) and current certificates for suppliers (please refer to our guide to importing, ref. P131fm).

- Cleaning and hygiene schedules – these need to show when and how often your equipment/site is cleaned. The records must also include a check that the equipment is rinsed with drinking water after it has been cleaned when sanitisers or detergents have been used.
- Pest control records – these need to show what pest control treatments you use and when. If you contract a pest control company to carry out pest control then you will need to include their details on your application form.
- Training records for staff – these must show details of training that demonstrate that your staff are aware of the special requirements of organic production.
- Complaints register of any complaints you may have received from customers and corrective action that you have taken.

3. The inspection

Direct inspection. This is when one of our UK based, directly employed inspectors, visit you to inspect your operation.

If your company is based in the EU - SA Certification can inspect and certify processor's outside of the UK, but can only do so where the operation has primary certification by another certification body that is registered in that EU country.

If your company is based outside the EU - SA Certification can inspect and certify processor operations in countries based outside the EU. This is dependent on the national legislation of the country in question.

Sub contracted inspection.

Certification can be achieved by SA Certification sub-contracting the inspection to the operator's local inspection body/certifier who will carry out the inspection to Soil Association standards. The certification will be completed in the UK.

If your company is based within the EU - SA Certification can sub-contract the inspection where the operation and product is already inspected and certified by another EU certification body.

For example, if an operator is certified by 'x' and wants to apply the Soil Association symbol on products in Europe, SA Certification can sub-contract the inspection to 'x' who will ensure the operation complies with SA standards. We do this with other certification bodies where a thorough review has been made and that SA certification is satisfied with quality control.

The inspection report will be forwarded to SA Certification for certification of the operation. If the EU certification body is not willing or able to carry out an inspection on behalf of SA Certification, a direct inspection will be arranged.

If your company is based outside the EU – Where a local inspection/certification body is assessed as operating equivalent systems to SA Certification, we can certify processor operations by sub-contracting the inspection to them. SA Certification will then assess the inspection report and complete certification. If no approved local inspection/certification body is established, direct inspection and SA Certification will complete certification.

3.1. Preparing for your inspection

The inspector will make a full tour of your premises. They will check the authenticity of the organic food being produced, packed or labelled to the Soil Association standards. Please note inspectors are not legally allowed to give you advice and do not make the certification decision.

3.2. What will we check for at the inspection?

- The inspector will discuss the process of the inspection and what will happen during it.
- Your record keeping (some of these won't be available at your initial inspection as organic products cannot be handled until your certificate is issued. You will need to show your proposed record keeping)
- If you process both organic and non-organic products we need to see how you separate them to maintain the organic products' integrity – including storage of ingredients, dedicated equipment and utensils
- Staff training you provide, making sure all necessary procedures are understood when working with organic ingredients
- Your pest control and cleaning procedures

3.3. What happens after the inspection?

At the end of your inspection, the inspector will show you the report they have produced and discuss with you any further action that you need to take. You and the inspector will then sign the report to agree that it is an accurate report of the inspection that has taken place.

You will then be issued with a compliance form. This explains if any further action is required by you after the inspection. You will need to read through the compliance form and confirm how you are going to undertake any corrective actions. If you think that you won't be able to complete the actions, or are unsure how to, then simply call your certification officer who will talk you through the requirements.

Your certification officer will also review your product specifications and your labels, as these need to be approved before we can issue you with a certificate. Once completed we can issue you with your certificate. We will also send you a trading schedule which lists all your licensed products. Once you receive this you are legally licensed to market the products listed on it as organic!

3.4. The rest of the licensing year

Your certificate is normally valid for 12 months. You may want to add new products to your range, or change the ingredients of a product or use a different supplier for your ingredients. This is straightforward and there are no additional costs for these changes.

- **Adding new products to your licence** – you can add as many additional products to your licence as you wish. Contact us for a specification form, fill it out and return to us with your labels for this product.
- **Change of labels** – if you want to change the labels on any of your products, please send us a draft copy, as we need to give you written approval before you can use any new labelling.
- **Removing products off your licence** – if you are no longer producing any of your products please let us know, so we can take it off your licence. Please note that the products must stay on your licence until you have sold them all and are no longer marketing them.
- **Change of ingredients** – if you want to use a different ingredient in your product, you can amend your product specification sheet, sign it and send it in to us to approve. If you want to change a lot of ingredients then we may need you to complete and send us a new form.

- **Change of suppliers** – if you want to use a different supplier for your ingredients, simply amend your specification forms, and send us a copy of the organic certificate of your supplier. If your suppliers are certified by SA Certification, you do not need to send us a copy of their certificate.
- **Change of company ownership, company name or contact name and details** – if you want to make changes to your company name or ownership please contact us for our change of company details form (ref: P370fm). If ownership of your company changes, then we may need to carry out an additional inspection. If you move to new premises please contact us in advance as we need to carry out an inspection at this new site.
- **New enterprises and extensions to your premises** – If you want to add a new enterprise to your licence, a new production line, or extension to your site then please contact us for an extension to licence application form (ref P106fm). We will need to carry out an inspection of this new enterprise before it can be added to your licence.
- **Spot inspections** – we are required by Defra to carry out a number of spot inspections of our licensees each year. These are unannounced and in response to a complaint or chosen at random. If the complaint is upheld then you will be charged for this inspection, for random spot inspections there will be no charge.
- **Follow up inspections** – If our inspector identified major non-compliances at an inspection, then we may carry out a follow up inspection to check that these non-compliances have been rectified. We will inform you if we need to do this, and there will be an additional charge for this
- **Surveillance inspections** – as the governing body on organic standards in the UK, Defra need to make sure that certification bodies including SA Certification are inspecting and certifying to the right level. In order to achieve this they carry out annual audits at our offices, and carry out surveillance visits of our licensees throughout the year. This is a shortened inspection to make sure that our inspection has correctly documented your operation and procedures on your site. Usually Defra will inform you if they want to carry out a surveillance visit, very occasionally they may be unannounced.

We keep you up to date with any changes we make to our services and changes to the EC Regulation or national legislation through our quarterly newsletter, *Certification News*. This also includes proposed new Soil Association standards or changes to existing standards. You will be invited to send in your comments on these proposals if they affect your business, to be reviewed by the standards committees.

4. Where do I go from here?

4.1 How SA Certification's business development team can help you:

- One to one help – our technical help line t: +44 117 914 2407 is open from 9.00 – 17.30, Monday to Friday to answer your questions on organic certification including the application process, filling out application and specification forms, queries on the Soil Association standards and what's required at inspection. Please leave an answer phone message if out of office hours and we will call you back.
- Assist you in sourcing ingredients from our unique product sourcing database *the source market place*. This currently lists over 15,000 ingredients certified to Soil Association standards. Once you become licensed let us know if you'd like your products listed on here. www.soilassociation.org/sourcemarketplace.
- You could also get listed in the Organic Directory. This is a consumer directory that features a wide range of different organic businesses, for further information please see www.soilassociation.org/getlisted.

- Why organic? website www.whyorganic.org. This new magazine style site is aimed at promoting benefits of eating organic and living an organic lifestyle to a wider public. Opportunities include product promotions through competitions and give-aways. Please contact the membership team for further information +44 117 987 4588.
- Provide training for you and your staff on organic food production standards, the organic market, the work of the Soil Association charity and the support services we provide.
- Provide you with market information from the Soil Association's organic food and farming report produced each year which contains essential information on everything from organic production through to retail sales figures for each food and non-food category in the organic sector.
- Arrange an account management visit to your site to discuss any organic issues affecting your business, services available to you and ways in which we can work more closely together. Being able to make a visit in person will be dependent on resources and circumstances. Please contact us for more information.
- Provide the opportunity to exhibit with us at organic and major food trade shows in the UK within an organic or Soil Association pavilion – this can include discounts on stand space, use of Soil Association branding on your stand, or the opportunity to exhibit in a product show case.
- Link you up with other licensed organic companies within your supply chain.
- Access to daily email bulletins on organic news from within national press and other media – we scan all of this so you don't have to!

For further information about our services call our business development team on +44 117 914 2407 or email us proc.cert@soilassociation.org