



Organic Food Federation

Explanatory Note 313

These notes are intended to help applicants comply with Organic EC Regulation 2092/91. They are not exhaustive and are for explanation only. In cases of doubt the Regulation or the OFF should be consulted.

Organic Certification of Contract Warehouse / Storage

Importers and Processors often need to use contract stores or warehouses and if they use them for storage of organic products, the facility or facilities concerned do need to be considered as if they were an integral part of the operation.

If a contract warehouse /store is not in possession of a current Certificate of Conformity issued by any one of the authorised UK Organic Certification bodies, an inspection will be required which will check the following:

1. General Warehousing Requirements

- 1.1 The store must offer clean, dry and infestation free space in which organic products can be stored physically or spatially separated from conventional products.
- 1.2 When there are a variety of food and non-food products stored by the contractor, the area for food storage must be physically separate from non-foods, especially from materials that can contaminate foods by taint or spillage.
- 1.3 Packaged organic products must be received into store and despatched from store unopened, free from damage and correctly labelled.
- 1.4 Products are not acceptable for organic processors or retailers unless they comply with this requirement.
- 1.5 Packaged organic products must be stored on pallets so that there is little or no overhang of packages and the pallet load is stable and not liable to damage while inserting into racking.
- 1.6 Fresh produce which is supplied in open crates or boxes must be stored on dedicated pallets which are kept physically or spatially separated (minimum 1 metre) from non-organic produce, and must be clearly labelled to show organic nature and origin of the goods.
- 1.7 If the organic goods to be stored require a controlled temperature or humidity, facilities must exist for the temperature or humidity to be continuously recorded.

2. Bulk Storage - Silos

- 2.1 Ideally bulk organic products must be stored in vessels or silos dedicated for organic products. The vessel or silo must be clearly marked to show the nature, origin and quantity of the material stored.
- 2.2 Where it is not possible to dedicate a facility, it must be possible to remove all traces of the previously stored product from the vessel or silo AND the delivery and off-take systems, and a fully documented cleaning procedure must be followed every time organic product is to be stored. A copy of this procedure must be submitted the O.F.F.
- 2.3 Where a bulk material has to be stored at controlled temperatures, records of the temperature must be kept.

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- 2.4 Bulk organic products may also be stored on the pallets or in the bulk containers in which they are transported. These must be clearly labelled to show the nature, origin and quantity of the material stored.

3. Bulk Storage - Floor

- 3.1 Unpackaged bulk organic commodities (e.g. cereals, seeds, sugar) may also be stored as floor stock in some warehouses. In these cases it is essential that the floor is in good condition (clean, dry and free from cracks, crevices and damage). Good housekeeping and gap proofing to protect from ingress of rodents and other pests is particularly important.
- 3.2 When used for the storage of organic material, the floor must be thoroughly cleaned to remove all traces of the previous stock. If power hosing is employed, the area must be allowed to dry thoroughly before use. All traces of fuel or oil spillage from tractors or other vehicles used in the warehouse must be removed.
- 3.3 Only after these steps have been taken can organic material be stored as floor stock. The warehouse used must be dedicated for organic product unless it is possible to ensure a physical barrier between organic and conventional material. Where different organic materials are stored in the same warehouse there should be a physical barrier separation and as a minimum precaution there should be a clear space (min 3 metres) separating different organic materials.
- 3.4 *Cross-contamination of one organic material with another is just as unacceptable as cross-contamination between organic and conventional.*

4. Pest Control

- 4.1 There must be a system of Pest Control by an approved Pest Control Contractor. *The Pest Control Contractor of all inspection visits, the types of bait used and the status of the baits must keep a record on site at the time of inspection. They will also advise on housekeeping issues that affect the likelihood of infestation.*
- 4.2 Insecticide spraying, fogging and fumigation cannot be carried out on organic products without loss of organic status. Organic products may not be placed in any area that has been so treated until an adequate time has lapsed to allow insecticide residues to disappear.
- 4.3 Organic products that are sprayed with insecticide cannot retain their organic status and must be declassified to conventional status.

5. Records

- 5.1 All organic goods entered into the contract store must be accompanied with a delivery note and the details must be stored in a manner that allows a summary of transfers over any defined period between successive organic inspections.
- 5.2 The store must have a stock control system that ensures that the exact location and stockholding of each organic product held is precisely known at all times.
- 5.3 Despatch notes/Delivery documentation must be checked as orders are picked up and for despatches of organic products must clearly state that the goods are organic. Copies of these must be filed in a manner that allows a summary of despatches over any defined period between successive organic inspections.
- 5.4 Records must be kept of all disposals giving details of code, quantity and reason for disposal.

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6. Despatch

- 6.1 When mixed loads of organic and conventional products are despatched, they must be physically separated and due precautions must be taken to avoid any direct contact between them.
- 6.2 The contract warehouse is to be responsible for ensuring that orders are distributed in vehicles that are clean and in good condition and that if controlled temperature distribution is appropriate, the temperature of the insulated container is correct at the time of departure. The haulier must be held responsible for ensuring that the correct temperature is maintained during the journey.
- 6.3 Hauliers who are registered with and comply with GAFTA/UKASTA Code of Practice must transport to and from the contract store or warehouse bulk cereals.
- 6.4 Hauliers who are registered with and comply with SCOPA Code of Practice must transport to and from the contract store or warehouse bulk Oils and Fats.

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