



# Organic Food Federation

## Explanatory Note 314

*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.*

### Best Practice for Processors (including On-farm processors) & Storage Units.

Best Practice is essential in organic processing and although it need not always be relevant to Organic Certification, failure to observe Best Practice increases the likelihood of contamination and accidental substitution which are serious organic non-compliances which could prevent the issue or renewal of a certificate of compliance.

#### **1. Premises.**

- 1.1 Must have adequate provision to ensure separation of storage and production and packing operations where appropriate.
- 1.2 Must have a clear perimeter that is kept free from debris or stored equipment that could harbour rodents and other pests. Must take adequate precautions to prevent wilful damage or theft.
- 1.3 Must be in a good state of repair externally and internally.
- 1.4 Doorways and windows must be suitably proofed to prevent ingress of animals and crawling or flying insects. Exterior doorways must be kept closed when not in use unless protected by a suitable barrier e.g. overlapping plastic strip curtains.
- 1.5 Provision must be made for the tidy separation and storage of waste. Waste contractors must collect at a sufficient frequency to prevent overflow of waste containers.

#### **2. Services**

- 2.1 Production and other areas must have an appropriate supply of essential services. i.e. Water, Electricity/Gas, Steam, Compressed Air (for pneumatic equipment), Where water traps and oil traps are fitted to pneumatic lines they must be bled frequently.
- 2.2 Water may be supplied from the most convenient supply authority or from deep wells. Water used for drinking or for rinsing or incorporation in product must meet European Drinking Water Standards and if used for organic products, upwards adjustment of chlorination is not permitted.
- 2.3 Illumination standards must be adequate and artificial lighting must be adequately protected from accidental damage; lighting immediately above food processing operations must be given particular attention.
- 2.4 Refrigerated storage must have provision for recording and indicating temperature at all times. Temperatures must be checked frequently, particularly when chill or cold store doors have been opened several times in succession.

#### **3. Finishes**

- 3.1 The wall, floor and ceiling finishes used in storage, production and packing areas must be appropriate to the operations conducted.

| Document No: | Revision No: | Issue Date: | Issued By: | Page No. |
|--------------|--------------|-------------|------------|----------|
| 314          | 1            | 29/08/07    | JW         | 1 of 3   |

- 3.2 For high-risk products the high care operation must be physically separated from low risk and dedicated staff must have separate changing rooms, separate protective overalls, footwear and head wear, and separate hygiene facilities.
- 3.3 For medium and high-risk products, all wall and ceiling finishes must be impervious, undamaged and easy to clean.
- 3.4 All walk-in refrigerated storage facilities must have wall and ceiling finishes that are impervious, undamaged and easy to clean. Insulation must be sound and exposed insulation must be regarded as a potential contaminant and dealt with promptly.
- 3.5 Floors must be well drained with no areas in which water or liquid product can accumulate For safety reasons they should have a non-slip, but cleanable finish.

**4. Plant & equipment**

- 4.1 All mechanical equipment must be fit for the purpose and designed for ease of cleaning. Wherever possible equipment should be stripped down for cleaning prior to organic production. Where this is not feasible without engineering intervention, a suitable cleaning procedure must be documented and implemented. If necessary this may need to be followed by purging with organic materials prior to commencement of an organic run. (Purge material must be discarded or used in non-organic product.)
- 4.2 Change parts for filling and packing equipment must be stored off-line where they can be protected from damage and kept clean.
- 4.3 When lubricants are used they must be unable to contact the product. Where product contact lubrication is required, water or vegetable oil is permitted. The use of emulsified oils or oils containing certain antioxidants are not permitted with organic products.
- 4.4 Equipment must be kept in a good state of repair and modifications for the purpose of improving performance must not be carried out utilising cardboard, string, adhesive tape or other materials capable of causing contamination to food product.
- 4.5 Storage bins, work in progress bins, sanitation equipment (brushes, mops, scrapers, cleaning cloths etc) must be in good condition, avoiding the use of wooden handles. In high care or special areas (e.g. vegan, nut/seed usage, gluten free, kosher etc.) it is essential to have clearly designated equipment (colour coding is particularly effective for this).

**5. Personnel Services**

- 5.1 All personnel working directly with food must have had Basic Food Hygiene instruction (certificate) and those working with organic products must have basic training in the principles of organic production. Training can be carried out externally or in house (providing the trainer is suitably qualified).
- 5.2 All personnel working directly with food must be free from contagious illnesses, bronchial or intestinal disorders and open sores or cuts. All of which must be reported as soon as they are detected. Persons having gastro-intestinal illnesses must seek medical clearance before returning to work.
- 5.3 All injuries must be reported and recorded. Open wounds must be dressed with an approved blue metallic strip plaster. Personnel with open cuts or sores or skin complaints must not be allowed to have contact with unwrapped foodstuffs.
- 5.4 The Personnel department or person responsible for personnel must ensure that all new employees are aware of Hygiene, Product Protection and Factory Safety Rules.
- 5.5 There must be separate male and female toilets and hygiene facilities and changing rooms. Each employee should be provided with secure storage facilities for his possessions.

|              |              |             |            |          |
|--------------|--------------|-------------|------------|----------|
| Document No: | Revision No: | Issue Date: | Issued By: | Page No. |
| 314          | 1            | 29/08/07    | JW         | 2 of 3   |

- 5.6 Cigarette smoking must not be permitted in any food production or storage area. There must be adequate provision for the disposal of smoking materials before personnel reach the changing rooms. Smoking materials must not be taken into production areas.
- 5.7 The wearing of jewellery (other than plain sleeper rings or wedding rings) and watches must not be permitted for any person who is directly involved in food preparation or is or may be in contact with unpackaged food products.

**6. Food Safety & Product Protection**

- 6.1 The use of glass must be avoided as far as possible in food production areas. A glass register must be drawn up and audited at daily intervals to ensure no breakages have occurred. Ceramic tiles and hard plastics should also be included in the audit since these can also shatter.
- 6.2 In the event of glass breakages (or any other damage involving the shattering or splintering) the event must be recorded and appropriate repairs carried out.
- 6.3 The use of wood in contact with food is to be avoided. If wood has to be used it should be close grained, knot free and smooth finish free from splinters or sharp edges. The wood must be continuously monitored and at the first signs of deterioration the effected section or piece must be replaced.
- 6.4 All liquids should be filtered; all dry ingredients should be sieved to remove foreign matter or agglomerated particles. To prevent metal contamination the use of strong magnets is recommended in the ingredient path as a minimum precaution, but if possible electronic metal detection equipment should be installed.
- 6.5 Metal detectors must be sited to protect product at the last point where the detector is effective.
- 6.6 When automatic inspection equipment is installed appropriate checks must be carried out to check correct functioning, and calibration must be carried out at a suitable frequency.

**7. Cleaning**

- 7.1 All food operations must have a documented Cleaning Procedure which details what has to be cleaned, how frequently it must be cleaned and what methods, equipment and chemicals are to be used for cleaning. The execution of cleaning activities must be monitored to ensure that no points have been missed.
- 7.2 The presence of dirt or soiled food matter on or around food processing and packing equipment is a clear indication that procedures are not being maintained and will be raised as a non-compliance if noted by OFF inspectors.

**8. General Points**

- 8.1 It must be noted that the points raised in this note are by no means exhaustive but they do outline the minimum requirements of a food processing and packing operation. While it might be possible to obtain or retain organic certification if none of the points above threaten organic integrity, it will be virtually impossible to sell to any company having a vendor assessment programme (all multiple retailers, most large manufacturers have one) unless all the above requirements are fully and acceptably covered.
- 8.2 Contraventions of GMP may be judged by the Federation's inspector to have an adverse impact on organic integrity and in such cases the observation may be treated as an organic non compliance and immediate corrective and preventative action must be taken.

|              |              |             |            |          |
|--------------|--------------|-------------|------------|----------|
| Document No: | Revision No: | Issue Date: | Issued By: | Page No. |
| 314          | 1            | 29/08/07    | JW         | 3 of 3   |