

Control of Organic Operation

Summary from:

SRS Organic Standard

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Based on

COUNCIL REGULATION (EC) No 834/2007 of 28 June 2007, as amended
COMMISSION REGULATION (EC) No 889/2008 of 5 September 2008, as amended

Commitment of the organic operator to the control system

Any operator who produces, prepares, stores, or exports products certified organic by SRS or who places such products on the market shall, prior to placing on the market of any products as organic or in conversion to organic submit his undertaking to the control system of SRS and notify his activity to SRS.

Where an operator contracts out any of the activities to a third party, that **subcontracted unit shall be also subject to the control system.**

Where an operator runs **several production units in the same area**, the units producing non-organic crops, together with storage premises for farm input products shall also be subject to the control by SRS.

The operator confirms his/her commitment in the certification contract with SRS:

- to perform the operations in accordance with the organic production rules
- to accept, in the event of infringement or irregularities, the enforcement of the measures of the organic production rules;
- to accept, in cases where the operator and/or the subcontractors of that operator are checked by different control authorities or control bodies, the exchange of information between those authorities or bodies;
- to accept, in cases where the operator and/or the subcontractors of that operator change their control authority or control body, the transmission of their control files to the subsequent control authority or control body;

- to accept, in cases where the operator withdraws from the control system, to inform without delay SRS;
- to accept, in cases where the operator withdraws from the control system, that the control file is kept for a period of at least five years;
- to accept to inform the relevant control authority or authorities or control body or bodies without delay of any irregularity or infringement affecting the organic status of their product or organic products received from other operators or subcontractors.

Control arrangements and undertaking by the operator

The **operator fills in the “Organic Project Description” (OPD)** and submit it together with additional documentation to SRS. These shall contain:

- name and address of operator, responsible and contact persons;
- detailed description of the structure of the operation, the units applied for certification as well as the non-organic part, regardless their distance to the organic unit;
- if applicable, name of the previous control body of the operator, previous year certification decision, list of detected non-compliances and their corrections;
- the subcontracting relationships with other units/ for certain activities within the operation;
- a full description of the unit and/or premises and/or activity to be certified, location of premises and, where appropriate, parcels (land register data) where operations are carried out;
- nature of operations and products;
- all the practical measures to be taken at the level of the unit and/or premises and/or activity to ensure compliance with the organic production rules;
- the precautionary measures to be taken in order to reduce the risk of contamination by unauthorized products or substances and the cleaning measures to be taken in storage places and at all steps of the production chain;
- internal quality control system and measures to ensure the organic integrity of the product and it's full traceability throughout the production chain.

The OPD crop production of the unit shall:

- indicate the storage and production premises and land parcels and/or collection areas and, where applicable, premises where postharvest handling, certain processing and/or packaging operations take place.;
- specify the date of the last application on the parcels and/or collection areas concerned of products, the use of which is not compatible with the organic production rules;
- be drawn up even where the operator limits his activity to the collection of wild plants;
- Following detailed maps shall be attached to the OPD:
 1. map of the region showing the location of fields and premises, distances
 2. farm map (including geographical coordinates, correct shape and spatial distribution of the fields, field names, buffer-zone width and description, neighboring fields and their description, roads and their direction, location of inputs and tools storage, manuring/composting site, product storage, living places, waste deposits)
 3. map of postharvest handling/storage facilities.

The OPD of processing unit:

In the case of a unit involved in the processing, packaging, re-packaging, labelling and/or re-labelling of organic products, the full description of the unit shall show:

- applied procedures and locations used for the reception, the processing, packaging, labelling and storage of agricultural products and other ingredients/processing aids/feed additives;
- map of the facilities with clear description regarding the use for organic or conventional product;
- the cleaning and disinfection procedures and pest control measures and the description of facilities used to store the used products;
- the procedures for the transport of the products;
- in case of animal feed production, the description of the compound feeding stuff that the operator intends to produce, the livestock species or class for which the compound feeding stuff is intended and the name of the feed materials that the operator intends to prepare.

The OPD for trading and exporting operations:

The following applies to operator involved in trading and export of organic product to abroad, for its own account or for account of another operator. It applies also to trading operator who only handles the selling documentation and never physically handles the product itself.

The OPD of trading operator shall:

- include the trader's premises and his trading activities;
- indicate the supplier, for the supplier of the organic product: supplier certificates, evidence for supplier supervision;
- reception procedures, transport, storage and any other facilities the operator intends to use for the product before selling.
- explain the practical measures to assure the separation and traceability of the product flow. The evidence the stock and financial records, transport arrangements, reception, selling records, repacking and relabeling records if applicable, shall be available and enable the verification of the incoming-outgoing product balance.

Control arrangements for subcontracted units

With regard to the operations, which are contracted out to third parties, the full description of the subcontracted unit shall include:

- a list of the subcontractors with a description of their activities and an indication of the control bodies to which they are subjected;
- written agreement by the subcontractors that their holding will be subject to the control by SRS, or in case the subcontractor is certified organic separately by SRS or other certification body the valid certificate shall be submitted;
- all the practical measures, including an appropriate system of documentary accounts, to be taken at the level of the unit to ensure that the products the operator places on the market can be traced to their suppliers, sellers, consignees and buyers.

Control visits

The **nature and frequency of the control visits shall be determined on the basis of assessment of the risk** of occurrence of irregularities and infringements regarding compliance with the requirements of the organic standard.

SRS shall conduct following types of control visits:

- **initial first inspection**: the completeness and the correctness of the OPD will be strictly checked, the first inspection is announced, very detailed, focused on the structure of the operation and the management practices, all fields (also non-organic) and units shall be visited;
- **regular full physical inspection**: each operation and its all premises shall be visited at least once in a year; these annual control visits may be announced or unannounced;
- **additional inspection**: announced or unannounced, depending on the risk level of the operation, these visits will focus on specific issues.

All the premises used by the operator for the conduct of his activities may be checked as frequently as the attendant risks warrant.

Sampling

SRS will take and analyse samples for detecting following:

- if products not authorised for organic production were applied or the contamination by such products occurred;
- for checking production techniques not compliant with the organic production rules.

The number of samples to be taken and analysed by SRS every year corresponds to at least 5 % of the number of operators under its control. The selection of the operators where samples have to be taken is based on the general evaluation of the risk of non-compliance with the organic production rules or on random bases.

SRS take and analyse samples in each case where the use of prohibited products or techniques is suspected. In such cases no minimum number of samples to be taken and analysed applies.

Sampling shall be conducted only by the SRS staff at the presence of the operation responsible person, **samples taken by the operator can not be accepted.** The sampling report is signed by the SRS staff and countersigned by the operation responsible person.

- (a) SRS shall pay particular attention to the critical control points pointed out for the operator, with a view to establishing whether the surveillance and checking operations are carried out correctly.
- (b) An inspection report shall be written up after each visit by the SRS inspector, countersigned by the operator of the unit or his representative and submitted to the SRS staff responsible for its evaluation.

Documentation and records keeping

All documentation, evidences and records shall be available during the SRS inspection for control and verification.

Stock and financial records shall be kept in the unit or premises and shall enable the operator to identify and SRS to verify:

- the supplier and, where different, the seller, or the exporter of the products;
- the nature and the quantities of organic products delivered to the unit, all materials bought and the documentation of their use and, where relevant, the composition of the compound feeding stuffs;
- the nature and the quantities of organic products held in storage at the premises;
- the nature, the quantities and the consignees / buyers, other than the final consumers, of any products which have left the unit or the first consignee's premises or storage facilities;
- in case of operators who do not store or physically handle the organic products, the nature and the quantities of organic products bought and sold, and the suppliers, and where different, the sellers or the exporters and the buyers;
- the full traceability of the final product back to the raw material origin, through the entire chain of operators responsible for the product from production, processing, transport, storage and trade.

The documents shall enable the verification at reception of organic products, raw materials, inputs, ingredients and additives, their origin, nature and quantities, processing steps, semi any final product stock and sold products. The accounts shall demonstrate the balance between the input and the output.

The operator shall submit **samples of all product labels and packages to SRS for approval PRIOR to their use.**

A **non-GMO declaration** that a product supplied have not been produced from or by GMOs shall be issued by a technical person responsible in the production factory (not by an administrative assistant) and shall contain at least following:

- name and address of the manufacturer;
- product name;
- identification of product (lot or batch number)
- components and their % share
- processing flowchart
- declaration that the product was not manufactured "from" nor "by" GMO
- obligation for the manufacturer to agree and accept SRS decision to take sample of the product and examine the accuracy of the declaration.

Access to facilities

The operator shall:

- give SRS access to all parts of the unit and all premises, as well as to the accounts and relevant supporting documents;

- provide SRS with any information reasonably necessary for the purposes of the control;
- submit, when requested by SRS, the results of its own quality assurance programs.