

How to...

Organic Certification

Demystifying the process

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The organic market has been growing at an annual rate of 20-25 percent for the last decade. Consequently, organic food processors are increasingly in search of certified organic minor ingredients (e.g. flavors, spices, thickeners, and colors). As seen by the growth of stores like Whole Foods, Trader Joe's and Wild Oats, and the opening of organic aisles in the mainstream grocery category, it is apparent that "organic" is here to stay.



Different from trends like the "carb craze," with its spiked (up and then down) growth, organic has experienced a smooth and healthy increase in popularity over the years. This is in part due to the fact that a supplier must make a true commitment to meeting the federal requirements of being "certified organic." Moreover, success and proliferation at the retail level is tangible evidence of the growth and sustainability of the organic market. This can only mean more opportunities and outlets for organic flavors and ingredients. If a company has ever considered jumping into the organic market, but is mystified at exactly how to begin, here are some pointers to getting started.

Organic Under the NOP

Now that the US Department of Agriculture's (USDA) National Organic Program (NOP) is up and running, consumers have increasing confidence in the integrity of the

organic label.¹ Anyone who sells more than \$5,000 a year in organic products must become certified in order to legally use the organic label. The NOP sets the rules and requirements for organic certification, which is carried out by accredited certifying agents, who may be private businesses, non-profits, or state governments. There are currently 97 accredited certifiers, of which 41 are foreign entities. A current list of accredited certifiers is available on the NOP Web site (www.ams.usda.gov/nop).

Once a company has decided to take the organic plunge, it will need to get its sources lined up, and make sure its facilities, procedures, and records are organized to meet the requirements. The company will also need to pay attention to how the product will be labeled or marketed,² which must also conform to USDA's rules.

Among the most important decisions to be made is choosing

a certifier. Although it may look like there are many qualified organizations to choose from, some may not be familiar with the issues involved in flavor manufacturing. Even fewer have the international expertise to assist with multiple countries of origin for raw product or export markets. One must not forget that any organic ingredients brought into the United States will have to be certified by a USDA accredited certifier. In addition, if a company wants to sell its products in the European Union, Canada, Japan and other international markets, the certifier should



The US Department of Agriculture's National Organic Program Web site is located at www.ams.usda.gov/nop.



More on the Web
www.perfumerflavorist.com

Links to international organic organizations

¹Many flavors are only sold to other processors; they rarely pack for retail market.

Organic Certification Case Study: Moore Ingredients

Tony Moore of Moore Ingredients, who has worked with Quality Assurance International, provides an inside look at the certification process.

P&F: How has the organic marketplace proven beneficial to your company?

Moore: Moore Ingredients was founded as a natural ingredient supplier to the flavor, food and fragrance industries about 13 years ago. Obviously, this pre-dates the organic marketplace as it is today. The maturation of the organic industry was perfect for us as all of our products were already applicable to and suitable for organic products, and we're experiencing double digit growth as a result. Also, as a long-time organic consumer, I'm extremely happy to be able to apply my art to a commerce I believe in.



Tony Moore

P&F: What was the certification process like for Moore? Any hints for companies just getting started?

Moore: The certification process itself was much like other quality systems audits such as HACCP. As we're a natural ingredients supplier, our existing internal systems were already suited to the requirements of being a Certified Organic Processor. My best suggestion for anyone interested in getting started would be to fully read and understand the current NOP and all ongoing legal litigation concerning it. It really is a well-written piece of legislature and extremely informative. Luckily, most folks in the flavor and fragrance industries are already well versed in the differences between natural and synthetic products and all the related issues of handling, use and regulatory requirements. These concerns mirror many of the issues they'll face as they seek certification.

P&F: What were some of the more difficult areas (if any) to tackle, during the certification process?

Moore: The most difficult aspect of the process was and continues to be sourcing and obtaining organic raw materials. Many of us more familiar with the modern, conventional food industry have become spoiled by the abundant availability of the basic raw materials needed to produce product. Before applying for certification of a particular product, every raw material needs to be checked and verified for compliance as well as availability. Crop harvest times and yields greatly affect the availability of organic ingredients, making thorough-scheduling and planning essential.

P&F: What is important to you in building a relationship with your certifier?

Moore: The unhindered exchange of information. It's important to me that my certifier trusts me as much that I trust them. Only in trust can we work together for each other's and the organic industry's benefit.

have accreditation from and/or partnerships with recognized agencies that will allow the product to be imported under those countries' organic regulations.

Although certifiers are barred from providing consulting services, a certifier must be able to give its client all the information needed about what the rules say and what particular issues must be addressed for compliance. There are also a number of independent consultants with backgrounds in organic inspection and certification who may be available to go over facilities and procedures, getting the operation up to speed.

Ingredient Sources

It is necessary that all organic suppliers are or can be certified by a USDA-accredited certifying body; companies will need a current organic certificate or a letter from the certifier on file to document this. If an organization is working with growers or processors who are not certified organic but who could qualify, the certifier should be able to set the company up with an appropriate certifier, or undertake the certification under its "umbrella." Companies will also need to make sure that all non-organic ingredients that may make

up the allowable percentages in the product^{oo} meet the NOP regulation in the following ways:

1. If non-organic, agricultural ingredients are used, they must be verified to be produced and processed without the use of excluded methods (genetically modified organisms or GMOs), irradiation, and sewage sludge (QAI refers to these as the "Big 3"). They must also be produced without volatile solvents. For products making an "organic" claim, non-organic agricultural ingredients can only be used if they are not commercially available in organic form. (7CFR205.105 & 205.270)
2. If non-organic, non-agricultural ingredients are used, they must not only meet the Big 3, as described above, but they must also be listed on the NOP's positive list of materials — "National List of Allowed and Prohibited Substances" (7CFR205.605).

^{oo} up to 5 percent for products claiming to be "organic" and up to 30 percent for products claiming to be "made with organic (specified ingredients or food groups)"

A flavor manufacturer will likely use organic agricultural ingredients for the majority of its product, adding additional flavors or flavor components to the product in small quantities. A material can be designated a natural flavor if it meets the US Food and Drug Administration definition under 21 CFR 101.22 and it contains solely the flavoring constituents, i.e. the constituents that provide the flavor, that are not of nutritional consequence. The National List of Allowed and Prohibited Substances allows the use of natural flavors so long as they are not produced using synthetic solvents and carrier systems or any artificial preservative. Producing flavors without synthetic solvents and carriers (e.g. hexane, propylene glycol) can prove challenging. Luckily, there are more organically available materials that can be used as carriers (e.g. starches, dextrins, corn syrup solids) and solvents (alcohol). Of course, solvents and carriers do not need to be organic, but they must be non-synthetic. Certifiers generally only require an affidavit or declaration from the supplier of the flavor to satisfy the requirements for the Big 3 and the lack of synthetic solvents, carriers, and preservatives.

It should be noted that if a company uses a non-agricultural material (ie, one that must be listed on the National List of Allowed and Prohibited Substances), it can only make an “organic” or “made with organic (specified ingredients or food groups)” claim on the product. The claim “100 percent organic” may only be made if a product is composed of 100 percent certified organic ingredients. The good news, however, is that an organic flavor manufacturer’s product will be sought out by other certified processors wishing to source all minor ingredients as organic. While certified processors are currently not required by the NOP to source organic flavors, more and more clients prefer to source organic flavors because of their commitment to organics and their desire to make a complete organic product.

ISO, HACCP and other Quality Management Systems

If certification has been accomplished under an International Organization for Standardization (ISO) or Hazard Analysis and Critical Control Point (HACCP) program, organic operations can easily be integrated. Whatever an organization’s quality management system, if it maintains a quality manual, standard operating procedures for each phase of your process, good employee training (a real must!), a complaint handling procedure, and documentation that all these procedures are

being followed, it’s already close to meeting the necessary requirements for passing an organic inspection.

Sanitation and pest control: One key to protecting the integrity of an organic product is care in preventing any possible contact with prohibited materials such as pesticides and cleaning agents. The company must make sure that the pest control contractor is aware of the organic operation, and that the company has written pest control procedures, maps of pest control stations, and logs showing all monitoring and pest control activities. Moreover, any organic products in storage or inventory need to be protected from contact by the material used.

Any time sanitizers are used on food contact surfaces it is advisable to double or triple rinse before running an organic line. Employees should check off a log to document where and when this is done.

Product separation: The second key to protecting organic integrity is to prevent any possibility of commingling organic products with their conventional counterparts. This means that all equipment and lines should be completely free of conventional and/or prohibited ingredients before the organic product goes through them. If this isn’t feasible, a company can also purge the equipment with organic ingredients/products that would then be diverted to the conventional product stream. Running organic lines at the start of a production cycle (i.e., after complete cleanout and sanitation of equipment and lines) is the best way to ensure that organic products cannot be accidentally commingled with conventional products.

The other critical ingredient in good product separation is clear signage (which should include tracking lot codes) on drums, bags, pallets, totes, and other ingredient containers. A distinctive tag color that identifies the product as organic is also helpful. Separate organic storage areas and dedicated organic bins and hoppers, while ideal, are not essential if identifying tags are clear and equipment is thoroughly cleaned before the organic line is run.

Labeling

Any non-organic ingredients or processing aids, even approved non-agricultural ingredients (such as the carriers in a flavoring), exclude a product from making the 100 percent claim. A company is not permitted to use the USDA or its certifier’s seal or logo on the principal display panel (PDP) as long it follows the specific requirements about size and colors of print and images. All organic ingredients and the certifier of the finished product must be identified on the information panel. Certifiers should review mock-ups of labels before they are printed to make sure that they are fully compliant with the NOP requirements.

Flavors are often sold to other processors in bulk. All that is required for non-retail products is the lot number on any container labeled as organic or containing organic ingredients.

Record Keeping & Audit Trails

Good record keeping is critical to any form of certification, including organic and other eco-labeling or

fair trade schemes; document review occupies a major part of most organic inspections.

All final products bearing an organic label must be traceable from the packaged product that the company ships through each transformation (packaging, grinding, blending, flavoring, roasting, cleaning, receiving of raw ingredients). It is essential to maintain a verifiable audit trail, based on lot codes that connect the final product to its component ingredients, including documentation of sanitation and clean out procedures as well as organic certificates for the raw ingredients. Many companies already do this, and regularly undertake mock recalls to ensure that the system is working as it should. A company's records must also allow an inspector to compare quantities of organic finished products sold and in inventory with quantities of raw ingredients received. Records pertaining to organic products must be maintained for at least five years.

Certification & Inspection Process

Once an organic compliance plan is in place and a certification agent has been chosen, a company will undergo a process that is clearly laid out under the NOP.

When certification is applied for, the applicant will be asked to complete an Organic System or Compliance Plan, including how the operation adheres to each of the relevant sections of the regulations. The certifier will review this information and let the company know if there are any problems that require correction before an inspection date is set.

A qualified inspector is then assigned. The inspector will arrange a mutually convenient time to tour the plant and review documents. Someone knowledgeable about the operation must be available for the inspection. The inspector will go over all the issues and concerns she or he observes and provide the company with a copy during the exit interview.

The certifier then reviews all the information submitted plus the inspection documents. The applicant may be asked for additional information, such as copies of labels, at this time. If the company is approved, it will receive a certificate that lists all the types of products covered, along with a letter outlining any problems that need correcting. If there are major problems, such as lack of certification documents for raw ingredients, these must be corrected before a certificate is issued.

If an applicant is turned down, the company can apply to a different certifier, but it will have to demonstrate that the issues identified by the first certifier have been corrected. The applicant can also appeal any adverse decisions directly to the NOP.

Once certified, an applicant will need to remain in compliance and update its Organic Compliance Plan each year. There will be another inspection as part of an applicant's annual monitoring requirement, at which time the company will need to show it has corrected any problems identified the previous year. Certification remains in effect until it is either voluntarily withdrawn or is revoked or suspended, which requires action by the NOP and gives an opportunity to appeal.

The cost of certification can vary significantly, depending on the certifier. Some charge according to the quantity of organic product sold or gross sales income. Others set fees based on the cost of providing certification services. State programs tend to charge less, but may not be able to provide the level of service or the swiftness offered by private certifiers. Applicants should be able to get an estimate of the total cost of certifying its operation before application submission.

Conclusion

Although the process may seem a bit daunting, once a company decides to take its first organic steps, it will see that the task is quite doable. The key is to choose quality and to choose wisely when making decisions on the path toward a successful organic debut.

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References

1. USDA National Organic Program (NOP), www.ams.usda.gov/nop. ■