

# Organic Processing Standards

## Overview by Abacus Organic Associates

The EU Organic Regulation (EC2092/91) lays down standards for organic processing which ensure the organic integrity of the product throughout the processing operation. All UK organic certification bodies (eg OF&G, Soil Association, OFF, SOPA, BDAA, QWFC) have written their own standards, which must include, as a minimum, the requirements of EC2092/91.

The main requirements for organic processing operations are as follows:-

1. Statutory Legislation & Good Practice – organic regulations do not override statutory legislation, they are in addition to it. Each processing operation must be registered with the appropriate statutory authority (eg Defra, EHO, MHIS) & comply with all relevant statutory regulations & good practice;
2. Composition – non-organic ingredients & additives may be used as long as they are from the Approved Lists in EC2092/91. GMOs or ingredients derived from them are not allowed;
3. Organic status - there must be proof of organic status for all organic ingredients used;
4. Segregation & HACCP - organic ingredients must be clearly identified & segregated from conventional products during:
  - a. Intake;
  - b. Storage;
  - c. Processing & Packing;
  - d. Transport
  - e. Display in open packaging (sealed & labelled packaging does not need to be kept separate);
5. A hazard analysis (HACCP) should be done to identify points in the process at which contamination of the organic products may occur;
6. Cleaning - cleaning chemicals, procedures & standards should be appropriate to the industry. If wet cleans are done, they must be followed by a final water rinse to remove traces of any cleaning chemicals;
7. Pest Control - procedures should be appropriate to the industry & trained personnel used. Licensed rodent baits are allowed but spraying of any kind is strictly controlled;
8. Records for Traceability & Mass Balance – appropriate controls must be in place & adequate records kept, so that it is possible to trace all ingredients used, from intake through to the final products & to compare quantities of organic ingredients used with quantities of finished products made;
9. Training - staff must be trained to understand the organic requirements;
10. Processes – must be approved. Certain processes such as solvent extraction, or use of ionising radiation are not permitted;
11. Packaging – recyclable or biodegradable packaging is preferred where possible;
12. Labels & Marketing Literature – there are very specific labelling rules for organic products. All labels & marketing literature should be approved by your organic certification body at the proof stage;
13. Effluent Control – the operation should not have an adverse effect on the environment.
14. Sub-Contractor Agreements These should be in place where operations such as packing, transport or storage of organic goods are carried out by a third party, to ensure they understand and comply with the organic requirements.

## Organic Food Product Composition – Overview

**TYPES OF INGREDIENT:** In the organic sector, food ingredients are defined as agricultural or non-agricultural, additives or processing aids.

- Agricultural ingredients are animal or vegetable ie they have been grown or raised. Only agricultural ingredients can be designated “organic”. They include the cereals, meat, poultry, eggs, vegetables, fruits, oils (from oilseeds), herbs & spices.
- Non-agricultural ingredients include water & minerals such as salt
- Food additives include pectins, gums, acids & lecithins. They perform a function in a food eg thickening, stabilising or emulsifying.
- Processing aids perform a function during the manufacture of the product but they do not have a function in the finished product eg calcium chloride helps coagulate cottage cheese, vegetable oils are used for greasing bread tins.

**COMPOSITION:** When making organic products, it's preferred that 100% of the agricultural ingredients are organic but at least 95% must be. The remaining 5% can only be from the list of approved non-organic agricultural products in Annex VI of EC 2092/91.

(Note 1 - In rare situations, a derogation may be given by Defra, where a particular ingredient is not available in organic form.

Note 2 - There is also a class of products containing 70-95% organic ingredients. They can't be labelled “organic” but can be labelled as containing a specified percentage of organic ingredients.)

Non-agricultural ingredients - can be used in any quantity, but must be from the approved list in Annex VI of EC 2092/91.

Additives & processing aids - can be used as required but must be from the approved lists in Annex VI of EC 2092/91.

Flavours - must be natural.

**Stabilisers /thickeners - Pectins & many different types of gum are approved (guar gum, xanthan gum, carrageenan etc)**

**Emulsifiers – lecithins (from eggs & soya) are the only approved emulsifiers**

**Colours – not allowed (except for annatto for traditional English coloured cheeses). Fruit products or spice which give colour may be used, but colours per se are not allowed.**

**Yeast, yogurt & cheese cultures etc – these don't have to be organic but must be non-GM**

Fats & oils – must be expelled, not solvent-extracted or hydrogenated

**Starches – must not be chemically modified**

Salt – conventional sources or sea salt can be used. Anti-caking agents (as found in salt used in the food processing industry) can be used if required, but it's preferred that they're not.

**GENETIC MODIFICATION:** – no genetically modified organisms or products derived from them may be used in organic products.

**WATER:** Mains water (potable water) contains chlorine & may be used, but extra chlorine cannot be added. If borehole or well water is used, it can be chlorinated only to the same level as mains water

**RECIPES:** Recipes should be written on a Multiple Ingredient Product Specification sheet and submitted to the licensing organic certification body for approval. No organic product should be licensed for sale until this approval has been given.

**FOOD SAFETY:** Preservatives are not allowed in organic foods, so the shelf life may not be as long as for conventional products. It's very important that this is made clear on the label & clear storage instructions given when new organic food products are marketed.

**STATUTORY LEGISLATION:** For certain products, UK law requires that additives be used (eg enrichment agents for bread & flour, addition of vitamins A & D in margarine). Statutory legislation always overrides the organic regulations.

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