

General requirements for organic inspection and certification of processing unit

Introduction

The basis for the production for organic products in Austria respectively in the European Union (EU) is based on the EU-regulations (EG) 834/2007 in the current version (incl. all associated regulations). This regulations is also available on our homepage "<http://www.abg-cert.com>" and is ready for download.

Additional to the valid regulations in the EU are the private standards (e.g. Bio-AUSTRIA, Demeter international,...). The majority of these additional guidelines can be checked and certified by Austria Bio Garantie GmbH (ABG) . If you need more information about other guidelines, please visit our homepage "<http://www.abg-cert.com>" .

Area of application/inspection contract/certificate

Area of application

This regulation shall apply to all companies that are active at any stage of production, preparation and / or of the sales of products with regard to organic production.

Conclusion of the inspection contract

From the time when the organic inspection contract is signed your unit applies as an organic unit and it will be reported to the Food Authority. And your organic products are allowed to be market in accordance with the above-mentioned areas of application. Thus, you are obliged to follow the organic rules for the production of organic products. The proof of certification is obtained after positive completion of organic inspection. If there arises deviations from the relevant regulations in the course of the first organic inspection, deadlines will be agreed to tackle the shortcomings. On expiry of the periods the shortcomings must be resolved.

Certificate

After the annual organic inspection you obtain a certificate. In this document all your organic products (defined directly or through their scopes) are listed. This certificate is the proof that your products are produced after the according of the Regulation (EG) 834/2007.

Basic requirements for inclusion in the inspection procedures

When the company is established in the inspection procedures, the company must generate a complete description of the unit and/or the equipment and/or the activities and all the concrete measures to be taken at the level of the unit and/or equipment and/or activities which are important to ensure the regulations of the organic rules.

The ABG developed structured blanks to unify these necessary specifications. You can request these forms at the ABG or download it from our homepage "<http://www.abg-cert.com>". These documents must be completed, established in a current version, signed and together with a company plan and organizational chart for "organic" – relevant units they are the basics for the first inspection and certification.

Required records for organic inspection

In order to verify compliance with the legal requirements in the context of organic inspection and to understand the "story" of the organic-product, we need a certain minimum level of records and they are important to be kept ready for the inspection.

On the annually occurring inspection the license holder must demonstrate that he follows the guidelines of the regulation (EU) 834/2007 in the relevant version and possibly adheres to the guidelines of other license partners (organizations or country-specific organic standards). A central point of the inspection is the examination of the flow of goods. The licensee has to prove that he bought a sufficient organic raw materials (or if necessary raw materials with additional association regulations) to produce the corresponding organic products. In consideration of formulating, yields and stock inventories. For the certification of organic products, this adjustment must be feasible and correct. A key requirement for the implementation to test the flow of goods is the complete absence of the aforementioned documents. An accounting using computerized support or a manually created index of raw material purchases, product sales and production records save costs of the inspection!

The following documents have to be collected and, where appropriate, to conduct current in summary tables:

- A list of purchased agricultural products as well as additives and processing aids used together with the name and address of each supplier and the proof that it is an organic product or a permitted conventional product. As evidence serve the currently valid organic certificate of the supplier, product labels and accompanying documents, which have to contain the organic notice in the prescribed form and the code number of the inspection body.
- Delivery note and invoices
- formulation
- Production records to follow the quantity of the handled raw materials

raw material procurement

Ingredients from certified organic production

In an processed organic product only agricultural products from certified organic production are allowed. In practice an organic inspection body assigns an valid certificate as proof of certified organic origin.

Before the first delivery of each supplier you have to demand a copy of the certificate. The validity and the certified products as well as the scope must be checked for each certificate. In the accompanying documents of the goods taken over (delivery notes, invoices , ...) in addition to the organic – notes (" biological " , " ecological " , " bio " or " eco ") and the code number (optional also the name) of the organic inspection body has to be visible (e.g. organic strawberries controlled by Austria Bio Garantie GmbH : AT - BIO - 301).

Ingredients conventional agricultural origin

Despite the principle that in an organic product exclusively agricultural ingredients may be included from organic farming, it is allowed (EU regulations) to use certain ingredients in conventional quality for the production of bio-product. This list of permitted conventional ingredients can be found in Annex IX in the EU regulations 889/2008. For other necessarily required ingredients, which are not available in organic quality, can be applied at the relevant Food Authority for a temporary exemption. Furthermore, it is also determined how much of these conventional ingredients are allowed in an organic product. These conventional ingredients in relation to an organic product only have to be 5% on the total weight of all contained in the organic product agricultural ingredients.

Non-agricultural ingredients - additives and auxiliary substances

A principle in the processing of organic products is the almost complete absence of additives and processing aids, unless they are absolutely required for the production of the organic-product. The list of authorized substances for organic products is therefore much smaller

than those for conventional foods. Details on application restrictions see Article 27 and Annex VIII of Regulations (EU) 889/2008.

For the additives and auxiliary substances according to the positive list in Annex VIII and for the substances and products referred to in Article 27 of Regulation (EC) No 889/2008 there is no quantity limitation.

Labeling

The identification of an organic-product is defined by the Regulation (EC) no. 834/2007 in the relevant version. A product that does not fully meet the requirements of the regulation is not a true organic product and therefore it is not allowed to contain any reference to organic farming!

The stated aim of the Regulation (EG) 834/2007 in the relevant version is the EU-wide scheme of organic farming.

For the purposes of this Regulation a product shall be regarded as bearing terms referring to the organic production method where, in the labeling, advertising material or commercial documents, such a product, its ingredients or feed materials are described in terms suggesting to the purchaser that the product, its ingredients or feed materials have been obtained in accordance with the rules laid down in this Regulation.

The labeling has to implement the additionally marked requirements according to Regulation (EG) 834/2007 in the relevant version, regardless of the general food labeling rules:

- The standard product designation has to be mentioned with an organic note (acronym). For better understanding the organic note can be tendered.
 - e.g.: **organic-apple-juice**
 - or **organic-apple-juice from organic production**
 - or **apple-juice from organic production**

- In the list of ingredients (if general prescribed) **have to** be specified, which ingredients are organic. This identification can be determined with the **organic-note** (acronym) and/or the **tendered note for organic production** e.g. indication with an*:
 - ingredients from organic farming*:
 - or organic ingredients*:
 - apple juice*, carrot juice*, acidifier: citric

In addition to the organic-note the indication of the code number and the indication of origin must appear on the label. This must not be led directly to the EU organic logo but in the same visual field in two lines one below the other. In the accompanying papers, the code number of the inspection body must also be cited . The code number of the Austria Bio Garantie GmbH is " AT - BIO - 301 "

It is not allowed to bring a product with an indication of the biological production in traffic, even if only a single point of the law is not completely satisfied. E.g.: it is forbidden to characterize conventional agricultural ingredients as organic ingredients, if they are not in the accompanying positive list of VO (EC) 889/2008 Annex VIII.

Specifics:

identification <95% products according to VO (EG) 834/2007
(*ehemals 70% Produkte nach VO (EWG) 2092/91*)

- **Products with conventional agricultural ingredients, which are not positive accredited according to organic regulation** [*no according to annex VIII (with an * indicated) or according to annex IX registered or a temporary exception for a member state has been granted*]

No organic note in the product name, in the list of ingredients, the individual organic raw materials are listed up with an percentage and a reference to organic farming.

If it is an half-product, the finished product is not allowed to be advertised as an organic products, even if the proportion of conventional ingredients would fall below 5 % by the mixing ratio.

- **Products with conventional agricultural ingredients, which are positive granted according to organic-regulation** [*according to annex VIII (with an * indicated) or according to annex IX registered or a temporary exception for a member state has been granted*]

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At least based on the specification of such products, the customer must be able to recognize whether he can use this for a > 95 % organic product

(e.g. "**all used conventional agricultural ingredients accord to annex 19 (2)(c) of the regulation (EC) 834/2007**").

On labels this notice also appear (e.g.: „**conventional agricultural ingredients according to annex 19 (2)(c) of the regulation (EC) 834/2007**“).

Uncontrolled growth

In the wild collected, edible wild plants (berries, mushrooms,...) may only be designated, according to the regulation, as "organic" and used as an ingredient in an organic product if those areas were included and accepted in the organic inspection.

Likewise, vegetables and fruits from the garden are only "organic" within, according to the regulation, and permitted for organic products if the garden has been inspected and approved as organic area by an inspection body.

Conversion

The use of plant products, which were produced under conversion to organic farming , is not permitted for processed as "organic" labeled products. Conversion products may be further processed only to so-called "mono-products". Mono-products only contain one agricultural ingredient.

This may not be called "organic" and can be described with the words "**product under conversion to organic farming**".

Note: The term "conversion goods" exists only in the processing area for botanicals. There are no animal "conversion goods"!