



NATIONAL ORGANIC PROGRAM

ORGANIC MEAT PROCESSING

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NOP Basic Handling Requirements

- **Organic System Plan**
- **Mandatory Record keeping**
- **Monitoring management practices**
- **May use mechanical or biological processing methods (cooking, baking, cutting, mixing, grinding, fermenting, distilling, freezing, etc.)**

Basic Handling Requirements (continued)

- Must implement structural pest management practices to prevent pest infestations, through sanitation, exclusion, trapping, & monitoring.
- Must take steps to protect organic products and packaging if “prohibited” pesticides are applied.
- Must keep records of all pesticide applications and steps taken to protect organic products, packaging, and production areas.

Basic Handling Requirements (continued)

- **Must implement measures to prevent commingling and contamination of organic products.**
- **Must not use packaging materials that contain synthetic fungicides, preservatives, or fumigants.**

Basic Handling Requirements (continued)

Mandatory Record keeping

(b) Such records must:

- (1) Be adapted to the particular business that the certified operation is conducting;**
- (2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;**
- (3) Be maintained for not less than 5 years beyond their creation; and**
- (4) Be sufficient to demonstrate compliance with the Act and the regulations.**

100% Organic Label

- **100% organic ingredients, excluding water and salt.**
- **No use of volatile synthetic solvents**
- **Processing aids must be certified organic**
- **No substances on the National List, unless organically produced**
- **May use USDA and/or certifier seal**
- **Must show name of certifier**



Organic label – 95%

- 95% or greater - must be organic ingredients, excluding water and salt
- Must use organic ingredients in the 5% if they are commercially available
- All minor ingredients and processing aids (<5%) must be on National List
- All organic and nonorganic ingredients must be produced without the use of volatile synthetic solvents, “excluded methods,” irradiation, or sewage sludge
- May use USDA and/or certifier seal
- Must show name of certifier



“Made with Organic”

- At least 70% of the product must be organic agricultural ingredients.
- Non – ag. ingredients must be on the National List
- Nonorganic ag. ingredients used in up to 30% of product must have been produced
 - Without genetic engineering, sewage sludge, and ionizing radiation
 - volatile synthetic solvents may have been used
- May use certifier’s seal, but not USDA seal
- Must show name of certifier

“Organic” in ingredient statement

- **May identify organic ingredients in ingredient statement**
- **May state % organic ingredients**
- **Does not need to be certified**
- **Cannot make front panel organic claim**
- **Must not use USDA or certifier seal**

Label Approval

- Get label claims pre-approved by certifier prior to order and use
- Meat labels must also be approved by FSIS
- Alcohol labels must also be approved by Alcohol and Tobacco Bureau

Calculating % Organic

- Subtract all added water and salt from calculation.
- Add the weight or fluid volume of all organic ingredients.
- Add the weight or fluid volume of all ingredients.
- Divide sum of organic ingredients by sum of all ingredients to determine % organic.

Substances Used in Processing

- **Ingredients (No organic and non-organic forms of same ingredients; Organic ingredients must come from certified organic suppliers)**
- **Incidental additives / Processing aids**
 - Boiler chemicals
 - Filter aids
 - pH control, drying agents
- **Cleansers, sanitizers**
- **Pest control products**
- **Packaging materials**

Structure of Processing List

- Closed, positive list (unlike crops or livestock)
- 205.105(c-d) is the “over-arching” rule -
It says:
 - All nonagricultural substances used “in or on processed products” must be on the National List
 - No nonorganic agricultural substances used “in or on processed products” except as stated in 205.606 – Then, processor must attempt to source organic – documentation

NOP Regulation

- **All ingredients, additives, processing aids must be approved on National List**
- **Must review all substances in contact with organic products**
- **Sanitizers/cleansers – generally permitted if not persistent and equipment is rinsed or purged prior to organic food contact**
- **Disinfectants- such as chlorine, hydrogen peroxide in food contact are subject to restrictions on National List**

Organic Control Points (OCPs)

- **Similar to HACCP – Hazard Analysis Critical Control Points**
- **Organic Control Point (OCP) - Any point or procedure in a food processing system where loss of control may result in a loss of organic integrity**

Implementing an OCP System

1. Assemble the OCP team.
2. Identify Organic Control Points, using facility maps, facility diagrams, and product/process flow charts.
3. Establish critical limits for each OCP (generally zero, under organic standards).
4. Establish “protective actions” for each OCP to prevent contamination or commingling.

Implementing an OCP System

5. Establish corrective actions for all products which have lost their organic integrity.
6. Implement an effective record keeping system to document OCP activities.
7. Monitor the effectiveness of the system through annual (or more frequent) inspection and evaluation – revise as needed.

Examples of Common OCPs

- Receiving station protocols (transport)
- Storage of organic and non-organic ingredients in the same area
- Same equipment used for organic and non-organic production
- Non-approved processing aids used for non-organic products
- Sanitation chemicals and procedures

Examples of Common OCPs

- **Boiler chemicals used for culinary steam**
- **Pest management**
- **Audit control**
- **Packaging and labeling**
- **Shipping (transport inspection)**
- **Waste management**

Organic Processing Considerations

- **Start ups – Many begin with co-processing or custom processing**
- **Work with existing conventional facilities**
 - **Need to set up organic processing schedule; thorough equipment cleanout and/or purge protocols; facility pest management; records/audit trail; employee training; certification – No longer Business as Usual**