Developing an Organic Control Point Program
Using the HACCP Model

In their Organic System Plan (OSP), operations must describe the management practices and physical barriers they use to prevent contamination of their organic products and the commingling (mixing) of organic and nonorganic products. Organic product processors must identify the points in their process where organic integrity may be lost, and then establish measures to control these points. This plan is called an Organic Control Point (OCP) Program.

Hazard Analysis and Critical Control Point (HACCP) is a systematic approach that identifies specific hazards that negatively affect the safety of food, and specifies measures for their control. The HACCP approach can be used as a model for developing an OCP Program. The HACCP model serves as an effective structure for managing these risks.

**7 steps to develop a HACCP-based OCP Program:**

1. **HAZARD ANALYSIS**

   Prepare a flow chart of every step in the process. Identify and list the hazards that threaten organic integrity together with their causes and sources. Determine which hazards are significant.

2. **DETERMINE THE OCPs (Organic Control Points)**

   OCPs are points or procedures in the organic system where organic integrity may be lost due to the commingling with non-organic product or contamination with prohibited substances.

   **Examples:**
   - Receiving of organic and non-organic ingredients
   - Sanitation and pest control
   - Use of the same equipment for organic and non-organic products
   - Storage of organic and non-organic materials in the same area
   - Packaging and labeling
   - Transportation of organic and non-organic materials in the same load

3. **ESTABLISH CRITICAL LIMITS**

   Critical limits are established to ensure that each OCP is under control. The critical limit is what separates acceptability from unacceptability.

4. **MONITORING SYSTEM**

   Establish a system to monitor the control of each OCP and ensure it is working. Examples include scheduled testing or observations. Keep accurate records of monitoring results.

   **Proper monitoring should address:**
   - *How* the monitoring is to be carried out
   - *When* the monitoring is to be carried out
   - *Who* is responsible for carrying out the monitoring
   - *The record* to be taken

5. **CORRECTIVE ACTION**

   Establish corrective action to be taken if a particular OCP is not under control or shows signs of instability. For example, in the case of a contaminated organic product, shipment may be stopped until the issue is resolved.

6. **VERIFICATION**

   Establish procedures for verification to confirm that the system is working effectively. This should include validation and review activities.

7. **DOCUMENTATION**

   Establish documentation concerning all procedures and records appropriate to these principles and their application. Effective recordkeeping is key in documenting each step of the process. Records must be available for the onsite inspection or added to the Organic System Plan (OSP) for review.

**See reverse side for a sample HACCP-based OCP Program.**
A Sample HACCP-based Organic Control Point (OCP) Program:

Steps 1-2

<table>
<thead>
<tr>
<th>Process Step</th>
<th>Organic Hazard introduced, controlled or enhanced at this step</th>
<th>Is the potential for Organic Hazard significant?</th>
<th>Justification for decision regarding hazard level</th>
<th>Control measure taken to prevent organic hazard</th>
<th>Is this step an Organic Control Point? If so, how is that OCP identified?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Labeling</td>
<td>Improper labeling of non-organic product as organic product</td>
<td>Yes</td>
<td>The wrong label stock could be used when labeling</td>
<td>Cross-verification of proper labels when labeling organic</td>
<td>Yes – OCP 7</td>
</tr>
</tbody>
</table>

Steps 3-7

<table>
<thead>
<tr>
<th>Organic Control Point (OCP)</th>
<th>Critical Limit</th>
<th>Monitoring</th>
<th>Corrective Action</th>
<th>Verification</th>
<th>Record Keeping</th>
</tr>
</thead>
<tbody>
<tr>
<td>OCP 7 Labeling</td>
<td>Zero non-organic product labeled as organic</td>
<td>Finished Product</td>
<td>Labeling report and computer verification of inventory</td>
<td>Prior to labeling each and every order</td>
<td>Warehouse operator and supervisor</td>
</tr>
</tbody>
</table>

Helpful Resources:

http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5090759