OEFFA Organic Certification Fact Sheet

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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.

NOP Citation: §205.272

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

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

Steps 3-7

Organic Control Point (OCP)	Critical Limit	Monitoring				Corrective Action	Verifica-tion	Record Keeping
		What	How	Frequency	Responsi-bility			
OCP 7 Labeling	Zero non-organic product labeled as organic	Finished Product	Labeling report and computer verification of inventory	Prior to labeling each and every order	Warehouse operator and supervisor	In the event that non-organic product is labeled as organic the product will be isolated, the label removed, and re-labeled under the guidance of quality assurance	Cross-verification of label and stock	Labeling report

Helpful Resources:

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