

**Standard Operating Procedures (SOP) for Food Safety Officers (FSOs)
to monitor compliance to the Food Safety and Standards (Organic Foods)
Regulations, 2017**

Introduction-

This SOP provides guidance for Food Safety Officers to inspect an organic product and traceability related documents.

a. Information for FSO:

Any food offered or promoted for sale as organic food is required to comply with all the applicable provisions of any one of the following (Regulation 4 under Chapter II of this regulation):

- i. National Programme for Organic Production (NPOP);
- ii. Participatory Guarantee System for India (PGS-India);
- iii. Any other system or standards as may be notified by the Food Authority from time to time.

Note- The Regulation has a provision that the Organic food which is marketed through direct sales by the small original producer or producer organisation to the end consumer are exempted from the provisions of the systems referred in above.

Vide Direction dated 29.06.2018, Small original producer or producer organisation has been described as those having the businesses with an annual turnover not exceeding Rs 12 Lakhs per annum.

b. Requirements for labelling-

The product may carry a certification or quality assurance mark in addition to the labelling requirements of one of the systems mentioned in (a) above in addition to the FSSAI logo with license number. The product shall have FSSAI Organic logo (Jaivik Bharat). All organic foods shall also comply with the packaging and labelling requirements specified under the Food Safety and Standards (Packaging and Labelling) Regulations, 2011.

1. Requirements of labelling under National Programme for Organic Production (NPOP)

If the product is fully certified under National Programme for Organic Production (NPOP) then the label must clearly display following logo.



Jaivik Bharat



In case of single ingredient product where all requirements have been met:

- Product may be labelled as 'Organic'.
- NPOP (India Organic Logo)
- Name of accredited certification body, accreditation number.
- FSSAI logo with Registration/License Number.
- Jaivik Bharat Logo

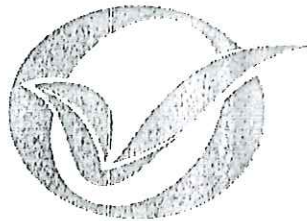
In case of Multi ingredient product where NPOP Logo (India Organic) is allowed is as under:

Where min. 95% of ingredients are of certified origin

- Product can be labeled as 'Certified Organic'.
- NPOP (India Organic Logo)
- Name of accredited certification body, accreditation number.
- FSSAI logo with Registration/License Number.
- Jaivik Bharat Logo

2. Requirements of labelling under Participatory Guarantee System (PGS-India):

If the product is certified under PGS-India programme then the label must clearly display following logo.



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In case of single ingredient product where all requirements have been met:

- Products may be labelled as 'PGS-Organic'
- PGS-India Organic Logo.

- FSSAI logo with Registration/License Number.
- Unique ID (UID) Code i.e. Certificate number
- URL for consumers to check verification code
- Jaivik Bharat Logo

In case of Multi Ingredient Product-

Where min. 95% of ingredients are organic:

- Product can be labeled as Organic
- PGS-India Organic Logo.
- FSSAI logo with Registration/License Number.
- Unique ID (UID) Code i.e. Certificate number
- URL for consumers to check verification code
- Jaivik Bharat Logo

c. Requirements for sampling and analysis-

Regulation 7 under Chapter II of FSS (Organic Food) Regulations, 2017 states that “Without prejudice to the provisions of these regulations, all organic food shall comply with the relevant provisions, as applicable, under the Food Safety and Standards (Food Product Standards and Food Additives) Regulations, 2011 and the Food Safety and Standards (Contaminants, Toxins and Residues) Regulations, 2011 under the Act and the rules and regulations made there under”.

- To ensure the compliance to the above Regulations, samples needs to be taken and analysed in FSSAI accredited laboratories.
- Sampling for laboratory testing to be done as per the sampling procedure described in Section 47 “Sampling and Analysis” of FSS Act, 2006, and rule 2.4 “Sampling and Analysis” of FSS Rule, 2011.

➤ **Checks of the Organic Food compliance at the Retailer end:**

For NPOP and PGS-India certified Food products:-

Retailer is the business entity which is not involved in manufacture or processing including packaging. A retailer buys the product in closed/sealed packs from manufacturer, processor, packer and producer and keeps them on shelves for sale to consumers.

- Check for traceability through purchase records to ensure that products have been purchased from organic certified manufacturer or processor, through a bonafide distributor, where applicable.

- ii. In case retailers source from producer or producer groups directly, then suitable trace records of the source of the produce and purchase records may be checked. In case of fresh produce, suitable evidence may be provided by the retailer on the source of the produce with supporting documents of transaction.
 - iii. Organic products shall be kept/ displayed separately in a manner that it is distinguishable from non-organic products.
 - iv. Check for labelling requirement as specified above.
 - v. Small retailers may distinguish Organic Food by placing stickers on the shelves.
 - vi. The sample may be drawn as per the standard sampling protocol and sent to the authorised testing laboratory.
- **Check of the Organic Food compliance at manufacturer, processor, handler/ packer end.**

For NPOP certified Food products:-

In addition to mandatory requirements for Conventional Foods under FSS Act, 2006 following parameters/ records to be checked to ensure the integrity of organic process:

- i. Unit is registered with NPOP accredited organic certification body.
- ii. Unit possess valid scope certificate for organic processing and is maintained on continuity basis.
- iii. All organic product labels are approved by the accredited organic certification body.
- iv. Production records are maintained for incoming raw material, manufacturing/ processing process, output records, sale records and are duly verified by accredited organic certification body. Ensure that all certification related records are verified by organic certification body at least once a year.
- v. Transaction certificates are available for all inward raw material and scope certificates indicate the quantum of production.
- vi. Scope certificates and Transaction certificates are issued with QR code and Bar code. FSO's can verify the genuineness of these certificates by scanning the QR code and instantly he will get the pdf copy of the certificate from APEDA's Tracenet.
- vii. Run audit trail for inward of raw material and outward of finished product as per the manufacturing process.
- viii. The samples can be taken for testing as per the standard sampling protocol and sent for testing in FSSAI authorised laboratory.

➤ **Checks of the Organic Food compliance at manufacturer, processor, handler/ packer end.**

For PGS-India certified Food products:-

- Scope certificates issued by the Regional Council (RC) shall carry the digital signatures of authorised signatory with “Valid certificates (in duration) from the PGS groups providing produce to the intermediary FBO. These include LG and farmer scope certificates issued by RC.
- Valid purchase records of purchase from these PGS groups.
- In case of re-packers, each finished package should carry the valid UID for consumer verification using NCOF website.
- FSO may check traceability parameters to ensure consumer always has information of the source of the produce based on the UID by randomly checking finished products from intermediary FBO.
- Run audit trail for inward of raw material and outward of finished product as per the manufacturing process.
- The samples can be taken for testing as per the standard sampling protocol and sent for testing in FSSAI authorised laboratory.

➤ **Checks for Import of Organic Food products:-**

In addition to the requirements laid down under Food Safety and Standards Act 2006, following additional documents should accompany the import consignment for checking by the custom authorities:

- i. Importer is registered with NPOP accredited organic Certification Body, for management of traceability.
- ii. Valid scope certificate issued by the NPOP accredited organic Certification Body of India (in cases where India does not have bilateral or multilateral equivalency for organic products with the exporting country) or valid scope certificate issued by authorised certification body of exporting country, if there is bilateral or multilateral equivalency agreement exists between NPOP and organic regulation of exporting country and APEDA has granted the authorization to such certification bodies.
- iii. Transaction Certificate issued by the accredited certification body.