

[Extracted Copy of ZENITH Guidance & Working Instruction]

Brief Introduction of Handling Requirements (NOP, EU, COR)

	NOP	COR	EU
Organic Production and Handling System Plan	<ul style="list-style-type: none"> • Operator must be transparent in Sharing their Plan information in ZENITH OMP form. • This includes but not limited to as mentioned below: • A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed, monitoring practices in order to verify that the plan is effectively implemented; • A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability. Prior approval for use of any input before its application is mandatory. Operator must submit Input approval request to ZENITH. • A description of the recordkeeping system implemented to comply with the requirements • A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances. • Genetically modified organisms (GMO) are not allowed. • Take precautionary measures at critical processing steps and keep records of those measures 		
Processing Facilities	<p>For the finished product to be considered certified organic, facilities or plants that handle, process, or handle agricultural goods after delivery from a farmer also need to have certification.</p> <p>Maps of the facilities and storage areas, ingredient sources, and the flow of the product from its point of origin through the various processing steps, packaging, storage, sale, and transportation should all be included in the organic handling plan. Every product's suggested label and recipe must also be included in the plan; don't print a label until the certifying agency has approved it.</p> <p>It's not necessary for a facility to process only organic products. As long as organic products don't come into contact with non-organic products or prohibited substances, it can also process conventional products.</p> <p>Equipment must be cleaned with organically approved cleaning agents or purged with organic products diverted to non-organic sales or use in order to prevent contamination of an organic run. You should document that this purge is sufficient to remove any nonorganic product or residue of a prohibited substance from the equipment.</p> <p>Cleaning products must be on the National List as per NOP/COR/EU regulations are rinsed completely. A clear water rinse protocol should detail when the rinse has been effective in removing all residue, as shown by a test strip on the equipment surface. You can test once and maintain the protocol, or test each time you do a rinse.</p>		

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	<p>When space allows, it is a good idea to store and label organic ingredients, product and packaging in a dedicated area so employees use the correct items during organic production.</p> <p>Washing Produce :</p> <ul style="list-style-type: none"> — “residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act,” which is currently 4 parts per million chlorine. — When washing produce, the rinse water that makes final contact with the organic product must not contain more than 4 ppm chlorine. — In other words, a food product, such as apples, may be bathed in water containing a higher concentration of chlorine, if it is permitted by the U.S. Food and Drug Administration (FDA), but that product must receive a final rinse of water containing no more than 4 ppm chlorine. — The procedures used to wash produce and to monitor chlorine levels in the wash water must be included in the OMP. "
<p>Split and Parallel Production <i>(An operation that produces or handles both organic and nonorganic agricultural products/ in-conversion products)</i></p>	<p>Management practices and physical barriers (distinct, defined boundaries) must be established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances throughout stage of production and handling with effective documentation and recordkeeping.</p> <p><i>(The operator shall maintain verifiable, accurate records of both non-organic and organic produce right from their production, harvesting, storage, processing, packaging, transportation and marketing)</i></p> <p>Production methods shall not alternate between organic and non-organic on a production unit.</p>
<p>Pest Management</p>	<p>Processing plants need to have a pest-management strategy that eliminates food sources, places of breeding, and habitat in order to prevent pest issues. The plan must also control environmental factors to stop pest reproduction and prevent pests from entering the building.</p> <p>Conventional pest-control agents may be employed with certification agency approval if materials on the National List as per NOP/COR/EU regulations are ineffective. It is necessary to take precautions to prevent these prohibited substances from coming into contact with organic goods and packaging materials. When a prohibited pest control product is used, many handlers have secondary trailers where organic ingredients, products, and packaging are removed for a set period of time.</p> <p>To comply with NOP/COR/EU regulations, these pest control stages must be documented as being carried out in this order.</p>
<p>Packaging and transport of products to other operators or unit</p>	<p>Operators shall ensure that organic products and in-conversion products are transported to other operators or units, including wholesalers and retailers, only in appropriate packaging, containers or vehicles closed in such a manner that alteration, including substitution, of the content cannot be achieved without manipulation or damage of the seal and provided with a label stating, without prejudice to any other indications required by Union law or importing country law:</p>

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	<p>(a) the name and address of the operator and, where different, of the owner or seller of the product;</p> <p>(b) the name of the product;</p> <p>(c) the name or the code number of the control authority or control body to which the operator is subject; and</p> <p>(d) where relevant, the lot identification mark in accordance with a marking system either approved at national level or agreed with the ZENITH and which permits the linking of the lot with the records</p>
<p>Recordkeeping</p>	<p>All certified processing or handling facilities must keep records to show that organic integrity is maintained throughout the process at the facility. These records must show:</p> <p>Certification for organic ingredients;</p> <p>A system for tracking products from the point of arrival through processing, storage, and sales, including lot numbers, production logs, inventory, records for storage and sales, cleaning, and pest control;</p> <p>Recipes that list each ingredient's percentage (apart from salt and water) in each product;</p> <p>A product flow chart that shows the steps involved, including the storage of ingredients and packaging, transportation of goods in and out of the process, processing of the final product with all inputs (such as steam or water), and storage of ingredients and packaging;</p> <p>All non-organic ingredients have to conform to organic standards; for example, the salt cannot contain any artificial flavoring agents or processing aids that are listed on the National List of Prohibited Substances as per NOP/COR/EU regulations;</p> <p>There are no pesticides or other prohibited materials in the packaging;</p> <p>Inventory management and storage meets organic regulations;</p> <p>Sales tracked through production to specific ingredient lots or deliveries;</p> <p>If applicable, documentation proving that incoming and outgoing transportation was clean prior to the presence of organic product;</p> <p>Pest control that follows the order of activities defined in the Pest Management section.</p> <p>Keep available documentary evidence on authorizations for the use of non-organic agricultural ingredients for the production of processed organic food</p> <p>Keep records of the use of products(External Input/Own Prepared/Any input), including the date or dates on which each product was used, the name of the product, its active substances and the location of such use</p> <p>In case of production of composite products, complete recipes/formulae showing the quantities of input and output shall be kept available</p>
<p>Ingredients and Processing Aids</p>	<p>Processors have a specific list of allowed and non-allowed products that's separate from the List of substances that can be used in organic farming.</p>

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	<p><i>Refer ZENITH Input Evaluation Policy for detailed description.</i></p>
Labels	<p>Label (any sort of marketing/ claiming which includes, labels,tags, stickers etc) must be approved, prior to usage, usage of unapproved labels may lead to Noncompliance.</p> <p><i>Refer ZENITH Labelling Policy for detailed description.</i></p> <ul style="list-style-type: none"> • Note that in case CB loss its accreditation, then in such cases Operation may use Existing Labels (old CB labels) upto 60 days, then in such case New CB have to approve the use-up of existing label supplies. Operators have to submit existing label supplies inventory for approval to ZENITH , and after 60 days must not use existing labels identifying the prior certifier. • Certified operations that change certifying agents voluntarily and have labels which identify their prior certifying agent on products they produce or handle, may not use up existing supplies of labels. New labels must be used immediately identifying the new certifying agent. <p>In case of Voluntary change of CB, operator may sell certified prepackaged products labelled with the name of the previous CB as long as these products were packaged before the CB change and an inventory list was provided to both CBs(COR Specific)</p>
Traceability	<p>‘Traceability’ means the ability to trace and follow food, feed or any product, and any substance intended or expected to be incorporated into food, feed or any product, through all stages of production, preparation and distribution</p> <p>‘stage of production, preparation and distribution’ means any stage from the primary production of an organic product through its storage, processing, transport, and sale or supply to the final consumer, including, where relevant, labelling, advertising, import, export and subcontracting activities</p> <p>Traceability needs to be documented backwards, meaning that it should begin with export, proceed with processing, and end with raw material receipt.</p> <p>To verify if goods are organic or conventional, a traceability check is performed. At every stage of production, preparation, and distribution, traceability must be assured in order to maintain the integrity of organic production.</p> <p>Verification of the entire document should be done. The product must be tracked from the point of sale, via processing, storage, and finally back to the source.</p> <p>Products intended for sale must be clearly marked as either organic or non-organic at every stage of handling, from the manufacturing facility to dispatch.</p>
Mass Balance	<p>Forward Traceability need to be maintained in Mass Balance. i.e from Receiving of Raw material to dispatch of finished material should be recorded.</p> <p>Determining the balance between the input and output is the goal of the mass balance check, which also aims to clearly verify the volumes of organic and non-organic products.</p> <p>For a specific product and for a particular period of time, the mass balance should be done.</p>
USCOEA Requirement	<p>Following Requirement must be fulfilled in order to fulfil USCOEA requirements: Agricultural products produced with the use of sodium nitrate shall not be sold or marketed as organic in Canada.</p>

[Extracted Copy of ZENITH Guidance & Working Instruction]

	<p>Agricultural products produced by hydroponic or aeroponic production methods shall not be sold or marketed as organic in Canada.</p> <p>Agricultural products derived from animals must be produced according to livestock stocking rates as set out in the most recent version of CAN/CGSB-32.310</p>
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[US-Canada Organic Equivalence Arrangement \(US-COEA\) -FAQ](#)

[United States-Canada Organic Equivalence Arrangement \(USCOEA\) – Overview](#)

Additional References :

- https://agriculture.ec.europa.eu/system/files/2023-11/organic-rules-faqs_en.pdf (FAQ regarding the provisions of Regulation (EU) No 2018/848 and its secondary legislation)
- [EU Regulation secondary acts cover organic production and labelling of organic products.](#)
- [NOP-SOE Final rule](#)
- [National Organic Program Handbook: Guidance and Instructions for Accredited Certifying Agents and Certified Operations .](#)
- <https://www.ams.usda.gov/rules-regulations/strengthening-organic-enforcement/faq>
- [USDA NOP Trade arrangement](#)
- [Trade arrangement and Labeling requirement](#)

Please be aware that this is only a selection of essential requirements as an introduction. The operator, of course, has to learn about and meet all requirements of the standard ([NOP](#), [COR](#) and [EU](#)).