

**Standard Operating Procedures (SOP) for Food Safety Officer (FSO)
For
Monitoring Compliance to the Food Safety and Standards (Organic
Foods) Regulations, 2017**

Introduction-

This SOP provides guidance for a Food Safety Officer to inspect an organic product and 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);

b. Requirements for labelling-

The product shall 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. All organic foods shall also comply with the packaging and labelling requirements specified under the Food Safety and Standards (Packaging and Labelling) Regulations, 2011”.

This means that all organic food products shall have two logos, one of FSSAI and another of either India Organic logo or PGS-India Organic Logo as the case may be.

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

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



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

- Product may be labelled as 'Organic'.
- Name of accredited certification body, accreditation number.
- FSSAI 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'.
- Name of accredited certification body, accreditation number.
- FSSAI logo

2. Requirements of labelling under Participator Guarantee System (PGS):

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



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

- Products may be labelled as 'PGS-Organic'
- PGS Logo (India Organic)
- FSSAI logo
- UID Code

In case of Multi Ingredient Product-

Where min. 95% of ingredients are organic:

- Product can be labeled as PGS Organic
- FSSAI logo
- UID Code

c. Requirements for sampling and analysis-

Regulation 9 under Chapter II of FSS (Organic Food) Regulations, 2017 also 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, 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 of these general regulations samples need to be collected and analysed in FSSAI accredited testing laboratories.
- Sampling for laboratory testing to be done as per the sampling procedure described in Section 47 “Sampling and Analysis” of FSS Act, 2006.

➤ **Steps/Parameters to check the Organic Food compliance at the Retailer end:**

For NPOP and PGS 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 or packer and keeps them on shelves for sale to consumers.

- Organic products shall be kept/ displayed separately in a manner that it is distinguishable from non-organic products.
- Check for labelling requirement as specified above
- Check for purchase records to ensure that products have been purchased from organic certified manufacturer and processor

iv. The sample may be drawn as per the standard sampling protocol and sent to the authorised testing laboratory.

➤ **Steps/Parameters to check the Organic Food compliance at manufacturer, processor, handler/ packer end.**

For NPOP certified Food products:-

Besides the general requirement mandatory under FSS Act 2006 following additional 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 issue 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. If required, samples can be drawn for testing as per the standard sampling protocol and sent for testing in authorised laboratory.

➤ **Steps/Parameters to check the Organic Food compliance at manufacturer, processor, handler/ packer end.**

For PGS-India certified Food products:-

- i. Scope certificates issued by the RC shall carry the digital signatures of authorised signatory of RC.
- ii. Actual ink signature of LG group leader on all the certificates handled to individual members.
- iii. Unique Identification (UID) Code to be checked on each certificate.
- iv. Each certificate will list out the area, crop and products certified during the year.

➤ Steps/Parameters 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 authorised certification body (as above).

