

## CERES Policy



### Policy on Traceability

1	<b>Aims</b>	This policy establishes minimum requirements for traceability of organic products
2	<b>Background</b>	As a response to globalisation and increasingly complex and anonymous supply chains, traceability is becoming more and more important in food production in general. For organic markets, however, traceability is even more essential.
3	<b>Normative framework</b>	<p><b>EU regulation:</b> Reg. 834/07, Art. 27 (13): <i>"(EU) Member States shall ensure that the control system as set up allows for the traceability of each product at all stages of production, preparation and distribution (...) in order to give consumers guarantees that organic products have been produced in compliance with the requirements set out in this Regulation."</i> Reg. 889/08: Art. 66:</p> <p><b>Documentary accounts:</b> " 1. Stock and financial records shall be kept in the unit or premises and shall enable the operator to identify and the control authority or control body to verify: (a) the supplier and, where different, the seller, or the exporter of the products; (b) the nature and the quantities of organic products delivered to the unit and, where relevant, of all materials bought and the use of such materials, and, where relevant, the composition of the compound feedingstuffs; (c) the nature and the quantities of organic products held in storage at the premises; (d) the nature, the quantities and the consignees and, where different, the buyers, other than the final consumers, of any products which have left the unit or the first consignee's premises or storage facilities;" Art. 86: <i>"With regard to the operations, which are contracted out to third parties, the full description of the unit (...) shall include: (...) (c) all the practical measures, including inter alia an appropriate system of documentary accounts, to be taken at the level of the unit to ensure that the products the operator places on the market can be traced to, as appropriate, their suppliers, sellers, consignees and buyers."</i></p> <p><b>NOP:</b> § 205.272 (a): The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and non-organic products...</p> <p><b>Strengthening Organic Enforcement (SOE)</b> <i>(§ 205.403 (d)(4)) An on-site inspection of an operation must verify: Mass-balances, in that quantities of organic product and ingredients produced or purchased account for organic product and ingredients used, stored, sold, or transported. (205.403 (d)(5)) An on-site inspection of an operation must verify: That organic products and ingredients are traceable by the operation from the time of purchase or acquisition through production to sale or transport; and that the certifying agent can verify compliance back to the last certified operation.</i></p> <p><b>JAS:</b> Notification 1606, Art. 4: The organic agricultural products used for ...processed food... shall be controlled not to be mixed with other ... products...</p>

4	Terms	<p><b>Traceability:</b> Possibility to identify the origin of a product or a product-batch, the processes and steps it has undergone, and the persons responsible for each</p> <p>SOE:</p> <ul style="list-style-type: none"> <li>• <i>Audit trail: Documentation that is sufficient to determine the source, transfer of ownership, and transportation of any agricultural product labeled as “100 percent organic,” the organic ingredients of any agricultural product labeled as “organic” or “made with organic (specified ingredients)” or the organic ingredients of any agricultural product containing less than 70 percent organic ingredients identified as organic in an ingredients statement ( § 205.2).</i></li> </ul> <p><i>Supply chain traceability audit. The process of identifying and tracking the movement, sale, custody, handling, and organic status of an agricultural product along a supply chain to verify the agricultural product’s compliance with this part (NOP § 205.2).</i></p>
5	Policy	<p>As a minimum, CERES will implement the above-mentioned requirement of the EU-regulation: at any post-harvest operation, at least the previous and the following producer or handler of a product or product-lot must be identifiable. To safeguard this, operators must implement procedures like physical separation, labelling, and detailed records. Nevertheless, we are aware that there are operations, like e.g. mills, dairies, or oil-mills, where even this level of traceability is very difficult to achieve.</p> <p>Therefore, as a general policy, we establish that, in its own interest, any organic post-harvest operation should try to achieve the highest possible level of traceability, according to the type of product and facility. The bigger the suppliers and their respective quantities, the easier it is to achieve a higher level of traceability.</p> <p>In all high-risk situations, CERES requires organic operators to keep reference samples. "High-risk" is defined in this context as frequent findings of pesticide or GMO residues in the respective product in the respective country or region.</p> <ul style="list-style-type: none"> <li>• Reference samples should be kept for at least one year after shelf life of product or re-evaluation date or for one year after distribution is complete, whichever is longer.</li> <li>• Sample size should be twice the amount required to perform specification testing.</li> <li>• Sample should be identified with product name, lot number and sampling date.</li> </ul> <p><b>- Strengthening Organic Enforcement (SOE)</b></p> <p>During NOP on-site inspections, CERES inspectors must:</p> <ul style="list-style-type: none"> <li>• Verify the traceability of product and ingredients within an operation during onsite inspections according to CERES work instruction “4-2-3_EN_General-Instructions-for-Inspectors_WI” (4-5-11_EN_Traceability-Check_T): <ul style="list-style-type: none"> <li>➢ Check records of operator’s activities that span the time of purchase or acquisition, through production, to sale or transport.</li> <li>➢ Check the audit trail documentation, including identification of agricultural products as organic on the audit trail documents.</li> </ul> </li> <li>• Verify the traceability of products in an operation’s supply chain back to the last certified operation. <ul style="list-style-type: none"> <li>➢ Check if the records enable to trace back to the last certified operations in the supply chain.</li> </ul> </li> </ul>