



CERES Policy

Policy on Traceability

1	Aims	This policy establishes minimum requirements for traceability of organic products.
2	Background	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	Normative framework	<p>EU regulation:</p> <p>Reg. 834/07, Art. 27 (13): "(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."</p> <p>Reg. 889/08: Art. 66: Documentary accounts:</p> <p>"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:</p> <ul style="list-style-type: none"> (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;" <p>Art. 86: "With regard to the operations, which are contracted out to third parties, the full description of the unit (...) shall include:</p> <p>(...)</p> <p>(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."</p> <p>NOP:</p> <p>§ 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>JAS:</p> <p>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	Traceability: 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

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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">• 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.• Sample size should be twice the amount required to perform specification testing.• Sample should be identified with product name, lot number and sampling date.		