

CERES Policy

NOP Processing Policies

1	Introductions	In several sections, the National Organic Program (NOP) leaves space for interpretation. Some of these subjects are treated in other CERES Policies, as e.g. 4.1.18 (Composting) or 4.1.20 (Beekeeping). The present Policy addresses exclusively issues related to processing of organic food, particularly in what refers to compliance of certain ingredients, processing aids and/or methods. The Policy will be adjusted (or the specific issue withdrawn), whenever the NOP provides more detailed guidance on the respective subject.
2	Ancillary Substances	
2.1	Definition	We adopt the definition of Ancillary Substances in the Formal NOSB Recommendation from 27 April 2016.
2.2	Background	Compliance of ancillary substances has been discussed by NOP, NOSB, Organic Trade Association (OTA) and other stakeholders for many years. In 2011, the NOP requested the NOSB to make a proposal. The NOSB presented a detailed proposal on 11 April 2013. On 27 April 2016, the NOSB approved a new, simplified proposal (4 instead of 12 pages), which was unanimously approved by the NOSB members. None of these proposals has received final approval by the NOP so far. In the meanwhile, the organic industry needs a regulatory framework for products where such substances are used.
2.3	Policy	CERES allows ancillaries according to the NOSB recommendation from 27 April 2016. This does, of course, not apply to substances, for which certain ancillaries are explicitly prohibited by the rule, as e.g. “synthetic solvents and carrier systems or any artificial preservative” prohibited for non-synthetic flavours (§205.605(a)). We have developed a template, based on the NOSB recommendation, which must be completed and signed by the manufacturer of the respective ingredient.
3	Ion Exchangers and Adsorber Resins	
3.1	Definition	Ion exchangers: Ion exchange is a very common process in nature and technical devices. Some non-synthetic substances (bentonite, diatomaceous earth, kaolin, etc.) with ion exchange properties, are listed in §205.605. In the following, we refer to polymeric (synthetic) resins used for purification purposes in the food industry. Adsorber resins: Adsorber resins have a similar function as ion exchangers. Instead of replacing one ion by another one, the respective ions are adsorbed to the synthetic resin, and then washed off.
3.2	Background	Since 2013, CERES has sent to the NOP several requests for clarification regarding compliance of ion exchangers or adsorber resins during organic food processing. These requests have not been answered so far. Therefore, based on information exchange with other certifiers, we have adopted our own policy.
3.3	Policy	We consider ion exchangers and adsorber resins not to be “ingredients” or “processing aids”, but “surfaces”, which get in contact with the organic product. Therefore, not the resins as such must be in compliance with §205.605 (which they are not), but <u>all substances</u> “used in conjunction to the resins, to activate, charge or wash the resins, do need to be approved materials on the National List, 205.605” (Quoted from an NOP guidance from 2012, which is no longer displayed on the NOP website, but has not been officially withdrawn either).
4	Certification of Micro-organisms	
4.1	Definition	We refer to bacteria and fungi used either in food processing, or in human or

		animal nutrition (e.g. probiotic bacteria).
4.2	Background	Such micro-organisms are listed in §205.605(a), meaning they can be used in organic food processing without being certified. But since they are considered “non-agricultural”, it is not clear, if they can be certified as such.
4.3	Policy	§205.2 includes in the definition of “livestock” “other nonplant life”. Micro-organisms are clearly among “other nonplant life” and thus covered by the term “livestock” (although this is not in line with modern biology). Furthermore, NOP Handbook 5014 from 2011 provides guidelines for certification of organic yeast. Therefore, CERES considers also other micro-organisms to be certifiable under NOP. The following conditions apply: - The substrate, on which micro-organisms are grown, must be composed of minimum 95% certified organic agricultural ingredients. - Any non-agricultural ingredients must be listed in §205.605. - The specific, clearly defined strains, which are certified, must be listed on the certificate or its annex. - The micro-organism supplier must declare the strains are food grade and not genetically modified. This declaration must be signed by a technical manager of the manufacturing company, not by a sales person. - Following Handbook 5014 guidance: when certified organic micro-organisms are used as starter culture, and exclusively certified organic ingredients and processing aids are used, the micro-organisms can be certified as “100% organic”, otherwise they will be “only organic”.
5	Related Documents	
5.1	External	- NOSB Recommendation on Ancillary Substances, 27.04.2016 - NOP Handbook 5014 on Organic Yeast, 22.07.2011
5.2	Internal	4.1.18 CERES Policy NOP Composting (Pol) 4.1.20 CERES Policy Beekeeping under NOP (Pol) 4.3.6.5 Ancillary Declaration (F)