

General requirements for organic inspection and certification of processing unit

Introduction

The basis for the production for organic products in Austria respectively in the European Union (EU) is based on the Regulation (EU) 2018/848, current version (incl. all associated regulations). You can also find this regulation linked via our homepage. www.abg.at.

Additional to the valid regulations in the EU are the private standards. The majority of these additional guidelines can be checked by Austria Bio Garantie GmbH (ABG). If you need more information about other guidelines, please visit our homepage www.abg.at.

Area of application/inspection contract/certificate

Area of application

This regulation applies to all companies that are active at any stage of production, processing or distribution or third-country imports of products with reference to organic production.

Conclusion of the inspection contract – initial certification

With the signing of an inspection contract your business unit will be reported to the relevant Food Authority. The proof of certification is obtained after positive completion of the initial inspection. You may only market products with reference to organic production in accordance with the above mentioned area of application once a valid certificate has been issued.

If there arise deviations from the relevant regulations in the course of the first organic inspection, deadlines will be agreed to tackle the shortcomings. On expiry of the periods the shortcomings must be resolved.

Follow-up certification

After the annual inspection(s) you will obtain an updated certificate. This document will list all your products from organic production (defined directly or via scopes). This certificate is proof that your products are manufactured in accordance with the Regulation (EU) 2018/848, current version.

Required records for organic inspection

In order to verify compliance with the legal requirements in the context of organic inspection and to understand the "story" of your products from organic production, we need a certain minimum level of records and they are important to be kept ready for the inspection.

On the annually occurring inspection the license holder must demonstrate that he follows requirements of Regulation (EU) 2018/848, current version and possibly adheres to the guidelines of other license partners (organizations or country-specific organic standards).

A central point of this control is the goods flow check together with the traceability check. The licensee must prove that sufficient organic raw materials (or raw materials of additional association guidelines, if applicable) were purchased in order to manufacture the corresponding products from organic production.

This must be done taking into account recipe proportions, yields and storage inventories. For the certification of products from organic production, this comparison must be feasible and consistent.

A key requirement for carrying out a goods flow inspection is the complete existence of the above documents. EDP-based goods accounting or a manually created overview of raw material purchases and product sales as well as production records can greatly reduce the effort involved in checking the flow of goods and help to save control costs!

raw material procurement

Ingredients from certified organic production

In principle a processed food product with reference to organic production may only contain agricultural products that themselves come from organic production. In practice, a valid certificate issued by an organic control body serves as proof of organic origin.

A valid organic certificate must be requested from each individual supplier before the first delivery. The supplier data (name, address), the validity and the certified products or the area of validity must be checked for accuracy on each certificate.

In addition to the reference to organic production ("organic", "ecological" or as a shortened form "organic" or "eco"), the code number of the inspection body must also appear on the documents accompanying the goods taken over (delivery notes, invoices, ...), which has certified the respective supplier.

Ingredients conventional agricultural origin

Despite the principle that only agricultural ingredients from organic production may be contained in a food with reference to organic production, according to the EU regulation it is permitted to use certain ingredients of conventional quality for the production of an organic product. This list of agricultural ingredients that are also permitted in conventional quality can be found as the corresponding "positive list"¹.

For other essential ingredients that are not available in organic quality, a provisionally authorization for the use of non-organic agricultural ingredients can be applied from the responsible food authority.

It is also specified how much of these conventional agricultural ingredients may be contained in a product in order to label it as an organic product². Overall, these permitted conventional agricultural ingredients may only be used in an organic product² to a maximum extent of 5% based on the total weight of all agricultural ingredients contained in the organic product².

Otherwise, the product must be labeled as a less than 95% product (<95% product²).

It should be noted that the permitted natural flavouring substances or natural flavouring preparations, yeast or yeast products and food additives marked with an asterisk (*) in the column of the code number according to Annex V of Regulation (EU) 2021/1165, current version, shall be calculated as ingredients of agricultural origin. These must be taken into account to the "extent of a maximum of 5%" mentioned above.

¹until 13.12.2021 in Annex IX of Regulation (EC) 889/2008 current version or from 01.01.2024 in Annex V Part B of Regulation (EU) 2021/1165, current version

²according to Regulation (EU) 2018/848, current version, Chapter IV, Article 30, (5), a)

³according to Regulation (EU) 2018/848, current version, Chapter IV, Article 30, (5), b)

Restricted products, substances, processing additives and auxiliary materials for the organic production of food

A principle in food processing related to organic production is to keep the use of food additives, processing aids and non-organic ingredients to a minimum.

The list of conventional products and substances permitted in organic production is therefore much smaller than that for conventional foods.

The products and substances approved for the organic production of food can be found in Regulation (EU) 2018/848, current version, Annex II, Part IV, Paragraph 2.2.

The list of food additives and processing aids approved for the organic production of food as well as details on application restrictions can be found in Appendix V in accordance with Regulation (EU) 2021/1165, current version.

Claim/Labelling

The labelling of a product with reference to organic production is legally defined by Regulation (EU) 2018/848, current version. A product that does not fully comply with the requirements of the regulation must not contain any labelling related to organic production.

For the purposes of this Regulation, a product shall be regarded as bearing terms referring to organic production where, in the labelling, advertising material or commercial documents, such a product, its ingredients or feed materials used for its production are described in terms suggesting to the purchaser that the product, ingredients or feed materials have been produced in accordance with this Regulation.

Irrespective of the general food labelling regulations, the following additional labelling requirements according to Regulation (EU) 2018/848, current version must be implemented when labelling food:

- In the case of "organic foods"² the commercial product designation should be accompanied by the term organic (and their derivatives and diminutives, such as 'bio' and 'eco'). For better understanding, the written reference to organic production can be added.

e.g.: **organic**-apple-juice

or: apple-juice **from organic production**

- In the list of ingredients (if general required) must indicate which ingredients are organic. This identification can be given with the organic reference (as an abbreviation) and/or with the written reference to the organic production method, e.g. usual identification marked with an asterisk (*):

ingredients from organic production: apple juice, carrot juice*, acidifier: citric

or: *organic ingredients: apple juice*, carrot juice*, acidifier: citric

²according to regulation (EU) 2018/848, current version, Chapter IV, Article 30, (5), a)

In addition to the organic information, the “code number of the responsible control body”⁴ shall also appear in the labelling.

In the case of “prepackaged food”⁵ that fall under the category “organic foods”², the EU organic logo and the indication of “provenance/origin”⁶ together with the “code number of the responsible control body”⁴ shall also appear in the labelling. The indication of “provenance/origin”⁶ and the “code number of the responsible control body”⁴ does not have to appear directly next to the EU organic logo, but are mandatory in the same visual field of the EU organic logo.

The “code number of the responsible control body”⁴ shall also appear on the documents accompanying the goods.

Particularities

Labelling “<95% products”³

Requirement:

- Products with conventional ingredients of agricultural origin that are positively approved according to the organic regulation⁷
- More than 5% by weight of the agricultural ingredients in the product are non-organic (conventional)

Labelling:

- These products must not have an organic reference in the sales description (with the product name)
- The list of ingredients shall indicate which ingredients are organic
- The total percentage of organic ingredients in proportion to the total quantity of agricultural ingredients shall be included in the list of ingredients
- In addition to the organic information, the label must also state the “code number of the responsible control body”⁴
- The EU organic logo MAY NOT be used

In the case of semi-finished products, finished products made with them may be advertised as organic products if the proportion of conventional ingredients falls below 5% due to the mixing ratio.

¹until 13.12.2021 in Annex IX of Regulation (EC) 889/2008 current version or from 01.01.2024 in Annex V Part B of Regulation (EU) 2021/1165, current version

²according to Regulation (EU) 2018/848, current version, Chapter IV, Article 30, (5), a)

³according to Regulation (EU) 2018/848, current version, Chapter IV, Article 30, (5), b)

⁴the code number of the control authority or control body to which the operator that carried out the last production or preparation operation is subject

⁵each sales unit that is to be sold as such to the end consumer and to providers of mass catering (within the meaning of Article 2 paragraph 2 letter e of Regulation (EU) No. 1169/2011 as amended)

⁶the place where the agricultural raw materials of which the product is composed have been farmed

⁷according to Annex V of Regulation (EU) 2021/1165, current version (marked with an asterisk (*) in the “Code” column) or according to the “positive list”¹ or for which a member state has granted a provisionally authorization for the use of non-organic agricultural ingredients

Labelling of "products from hunting or fishing with ingredients from organic production"⁸

Requirement:

- Products whose main ingredient is a product of hunting or fishing and
- otherwise contain only organic ingredients and
- in the production of which only the products, substances, food processing additives and processing aids permitted for the organic production of food are used

Labelling:

- May carry an organic claim in the sales denomination (next to the product name) provided that the organic claim in the sales denomination is clearly linked to another ingredient that is organic and different from the main ingredient
- The list of ingredients shall indicate which ingredients are organic
- The total percentage of organic ingredients in proportion to the total quantity of agricultural ingredients shall be included in the list of ingredients
- In addition to the organic information, the label must also state the "code number of the responsible control body"⁴
- The EU organic logo MAY NOT be used

Labelling of in-conversion products³ (products produced during the conversion period⁹)

Requirement:

- Product manufactured during the conversion period⁹
- Only applicable to mono-products (products containing only one agricultural ingredient)
- The term "in-conversion product" only exists in the processing area for vegetable raw materials. There are no animal "conversion products"

Labelling:

- These products MAY NOT be labeled as "organic".
- They may be labeled as "in-conversion products" or "products from conversion to organic production"
- In addition to the organic information, the label must also state the "code number of the responsible control body"⁴
- The EU organic logo MAY NOT be used

⁴the code number of the control authority or control body to which the operator that carried out the last production or preparation operation is subject

⁸according to Regulation (EU) 2018/848, current version, Chapter IV, Article 30, (5), c)

⁹according to Regulation (EU) 2018/848, current version, Article 10

Collected wild plants

Edible wild plants (berries, mushrooms...) collected in the wild may only be labeled "organic" according to this regulation and used as an ingredient for products related to organic production if these collection areas are included in the control system and the products collected there have been validly certified.

Likewise, fruit and vegetables harvested in your own garden are only "organic" within the meaning of the regulation and thus permitted for organic food production if the garden is included in the control system as an organic area and the products harvested there have been validly certified.