



STATE OF WASHINGTON
DEPARTMENT OF AGRICULTURE
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INTERNATIONAL ORGANIC PROGRAM
RECORDS REQUIRED FOR EU ORGANIC PRODUCTS
SODIUM SILICATE APPROVED

August 8, 2008

Dear International Program Applicant,

NEW Recordkeeping Requirements Under the European Organic Program

It has come to our attention that some handlers are not providing growers with receipts, bin tickets, or pool closing summaries that properly distinguish between EU organic products and US organic products.

EU certified organic handlers and processors must ensure that:

1. Bin tickets clearly identify EU certified organic crops.
2. Receiving tickets clearly identify EU organic crops.
3. Receiving records clearly indicate incoming amounts of EU organic crops versus US organic crops.
4. Production and sales information provided to EU certified organic growers must clearly indicate the amount of EU organic crop received and sold versus US organic crops.

Identification of the crop as “organic” only on documents and records will not satisfy this requirement due to the fact that you are operating under two different organic systems and are handling both US organic and EU organic products.

Section A of the Handler and Processor Additional Requirements for the European Program (AGR 2318) requires operations that wish to participate in the program to maintain detailed records regarding EU organic products. All records associated with the product must clearly distinguish EU organic products from US organic products.

Section A – Scope and Compliance Documentation

5. Handlers and processors who wish to have products certified under the WSDA European Organic Program must keep records regarding the product’s compliance with the WSDA European Organic Program Additional Requirements, as well as compliance with the US National Organic Standards.
6. All facilities that handle EU organic products and non-EU organic products (US-NOP organic, transitional, conventional) must clearly identify and separate EU organic products from non-EU organic products. In addition, the following records must be maintained:
 - a. Records of applications of post harvest materials must clearly distinguish applications made to EU organic products and applications made to US-NOP organic, transitional, and/or conventional products.

- b. Records that clearly indicate incoming amounts of EU organic products and incoming amounts of US-NOP organic, transitional, and/or conventional products.
- c. Records that clearly describe sales of EU organic and sales of US-NOP organic, transitional, and/or conventional products. The volume of EU organic products sold must correspond to the volume of EU organic products received.

You must ensure your recordkeeping system meets the requirements of Section A of the Handler and Processor Additional Requirements and immediately make changes to your recordkeeping system if you have not been maintaining the required records. This requirement will be further evaluated during EU organic program inspections and reviews of your file.

Sodium Silicate

Our office has received notification from the Department of Environment, Farming and Rural Affairs (DEFRA), the United Kingdom organic regulatory authority, that Sodium Silicate used as a floatation agent during the handling of organic tree fruit is now considered an approved post harvest substance. This clarification allows the use of sodium silicate as an approved floatation material in EU organic tree fruit handling.

Due to this change, the WSDA European Organic Program Additional Requirements have been updated. Sodium Silicate has been removed from the list of prohibited materials in Section G of the Producer Additional Requirements (AGR 2313) and Section B of the Handling and Processing Additional Requirements (AGR 2318). Please visit our website for the most current version of the Additional Requirements, or contact our office if you would like a hardcopy mailed to you. www.agr.wa.gov/foodanimal/organic/default.htm.

How does this change affect your 2008 European Organic Application?

In order to make a change to your application, and include the use of Sodium Silicate with EU organic products, please contact our office as soon as possible to update your EU Organic System Plan. Please submit information to our office regarding the specific sodium silicate product you wish use, such as a technical data sheet or other information from the manufacturer of the product.

It should also be noted that sodium silicate as a post harvest handling material is currently approved under the USDA National Organic Standards per Section 205.601. However, you must ensure you also notify our office if you wish to begin using sodium silicate with your US organic products as well as EU organic products.

Please contact Brenda Book, Organic Certification Coordinator, if you have any questions. Brenda can be reached at (360) 902-2090 or email: bbook@agr.wa.gov.

Sincerely,



Miles McEvoy
Organic Program Manager

MM/bb