

# ORGANIC MEAT & POULTRY PROCESSING BASICS

## Why consider organic?

Organic is one of the fastest growing sectors of the food and agriculture industry in Minnesota, the nation, and abroad. Retail consumer sales of organic food, including meat and poultry, have been growing at about 20% per year. Industry sources expect the trend to continue, predicting 30% annual increases in sales for meat, poultry, and fish between 2004 and 2008. Consumers have shown they are willing to pay premium prices for certified organic meat and poultry, but a lack of certified organic meat processing facilities has held back further growth.

Whether you are looking at converting your entire operation to organic, thinking of starting a new business, or considering the addition of certified organic processing to the services you currently offer, organic may add an attractive option for customers and benefit your bottom line.

## What does “organic” mean?

Organic agriculture is a guarantee about how an agricultural product was grown and handled before it reached the consumer. It's also a set of requirements for farmers who grow food and processors who manufacture food products. Organic farmers use management systems that promote and enhance biodiversity, biological cycles, and soil biological activity. Organic processors maintain food's organic status by segregating it from synthetic and other prohibited materials, carefully tracking ingredients, and using detailed record keeping.

The United States Department of Agriculture's National Organic Program (NOP) oversees the national organic rule (7 CFR Part 205) that went into effect in 2002. The NOP establishes consistent national standards for organic production, facilitates interstate and international commerce, assures that organic food meets a consistent standard, and protects consumers from fraudulent organic claims. The federal organic rule is posted on the USDA web site: [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)



## What is organic meat?

NOP livestock rules apply to both meat and poultry. The NOP sets standards for the raising, feeding, housing, medical treatment, and processing of livestock. For meat to be sold as “certified organic,” it must be processed in facilities certified by an accredited certifying agency.



# So what does this mean for meat and poultry processors?

Each production or handling operation that produces livestock or livestock products must be certified according to the provisions of the NOP. **Plants that currently meet USDA or Minnesota regulations generally have little trouble meeting additional organic requirements.** Here are the basic considerations for organic meat processing:

- Animals accepted by the plant must be certified organic and trackable by individual animal or flock. Livestock producers must maintain records that document the identity and handling of all animals and animal products produced by their operation. Processors must continue this record keeping paper trail to ensure the integrity of the final organic product.
- Animals kept on the premises for any length of time prior to slaughter must be fed organic feed, have organic bedding, if edible, and be treated according to the livestock provisions of the NOP. The goal of most organic processors is to hold animals no more than a half day.
- Slaughter methods should minimize fear and stress to the animal.
- Appropriate clean-outs must be done prior to an organic production run. The NOP's "National List of Allowed and Prohibited Substances" details which products (cleansers, sanitizers, solvents, insecticides, etc.) may contact organic product, and which are strictly prohibited. Clean-outs before organic runs can often be done with the plant's usual cleansers and sanitizers, provided any residue is rinsed away prior to processing the organic animals. An extra hot water rinse is commonly used to remove final traces of cleansers which might contaminate the carcasses.

Proper clean-out between runs prevents contamination or commingling from any non-organic runs. Many

smaller processors run their organic product first thing in the morning or following a standard operation clean-out. One chicken processor says she does a clean-out after every run anyway, even in her conventional lines, to avoid cross-contamination between lots brought in by different producers.

- Plants must implement pest management that relies on prevention, exclusion, sanitation, removal of pest habitat, management of environmental factors (such as temperature, light, humidity, etc.), mechanical or physical controls, and use of lures and repellents that appear on the National List. If pest control products not on the National List are used, the processor and certifier must agree ahead of time on measures the processor will take to prevent contact of organic product, ingredients, and packaging with the prohibited substance.
- Packaging must be free of synthetic fungicides, preservatives, or fumigants. All finished product labels must be approved by the certifier.
- Finished products cannot be mixed or come in contact with non-organic products or prohibited substances such as pesticides or non-approved sanitizers. A storage area should be dedicated to the organic products.

Facilities with a good HACCP (Hazard Analysis and Critical Control Point) program in place will find that organic tracking and documentation use the same protocols.



## What are the challenges for processors?

- You must be willing and able to maintain the paperwork trail that ensures compliance with the NOP.
- If you have non-organic operations in the same plant, you must be able to prevent commingling and contamination of the organic products (in both processing and storage areas).
- Conventional processing sometimes uses fly sprays that are prohibited in organic production. (This includes direct application on the backs of animals to flush flies when animals are brought inside for slaughter). Pest control strategies may have to change.
- Some products approved for use in organic processing may be more costly. Talk with your certifier. Review the National List for approved and prohibited processing ingredients, cleansers, solvents, etc. The list is available at: [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop) The Organic Materials Review Institute (OMRI) also publishes information about products by chemical content and brand name and can be useful when considering different products for use in organic production and handling. OMRI's web site is: [www.omri.org](http://www.omri.org)
- Extra time must be budgeted to train employees about the importance of commingling and contamination issues. Lack of proper training has been a source of noncompliance problems. Management and staff changes can present challenges as well.

## How do I get organic certification?

**1. Application:** The NOP requires that a processing facility be certified by a USDA-accredited certification agency. Each certifying agency has its own application package and sets its own fees. Applications are generally about 10 pages long. They ask the processor to provide a detailed organic handling system plan and require documents such as floor plans, flow diagrams, and sample labels. Section 205.201 of the NOP lists a plan's necessary components:

- a description of practices and procedures to be performed and maintained;
- a list of all substances used in production or handling;
- a description of monitoring practices and procedures;
- a description of the record keeping system;
- a description of management practices and physical barriers established to prevent commingling or contamination; and
- any additional information required by the certifier.

The certifying agency reviews the application and works with the processor to make any necessary changes to the organic system plan.

**2. Inspection:** The agency assigns an inspector who reviews the application materials and facility records, then visits the plant for an on-site inspection, which generally takes 3 to 5 hours. Complete access to the production or handling operation, including any non-certified production and handling areas, is required. The inspector then completes an inspection report. The complete report usually consists of a document completed on-site and co-signed by the operator and the inspector, and another report completed by the inspector off-site.

**3. Review and Decision:** The certifying agency reviews the inspection report. If the agency determines that the facility meets NOP requirements and is following its own organic handling plan (created in Step 1), certification is granted. Certification allows the use of the term "organic" and use of the USDA Organic seal. Continuation of certification requires updating records on file with the certifier, an annual on-site inspection, and renewal fees. The whole inspection process, from application to certification, generally takes at least 8 weeks depending on the availability of inspectors and the certifier's workload. Records related to certification must be maintained for not less than 5 years.



### How do I choose a certifying agency?

It is important to find a certifier you are comfortable working with. The Minnesota Department of Agriculture recommends that you contact several agencies. Ask about fee schedules (which can vary widely), services, and their policies about follow-up calls during the year. Each certifying agency is required to provide a list of its clients to the public. You may want to call certified organic processors in your industry and find out which agencies they are using. If you intend to sell to international markets, find out which certifier your foreign customer prefers. You can get a list of accredited certifiers for Minnesota at [www.mda.state.mn.us/esap/organic](http://www.mda.state.mn.us/esap/organic).

## Case studies:

### Ledebuhr Meat Processing Inc.

This USDA-inspected plant in Winona, Minnesota, has been organically certified since 1999. This move was originally prompted by one of the company's customers in Iowa. For a while this was Ledebuhr's only organic customer. Since the NOP law passed in 2002, however, Ledebuhr has added four new organic customers – customers they would not otherwise have – and organic now accounts for 3% of the business by volume. Whenever possible, the plant slaughters the organic animals first thing in the morning. David Ledebuhr acknowledges that the paperwork is “a pain”, but says he is used to it in the rest of his business and organic is just more of the same. David charges extra for certified organic processing, pointing out that since he pays for his own certification, it is important to factor the additional costs into his pricing schedule.

### Lorentz Meats

This USDA-inspected plant in Cannon Falls, Minnesota, has been certified since 2000. Lorentz is processing a significant amount of organic product and saw more than 50 percent growth in the volume of organic products processed in 2004 alone. Mike Lorentz anticipates the trend will continue. Currently dedicating 2-3 full days per week to organic production, Lorentz has been approached by several new organic customers with processing projects. Those inquiries fuel the company's optimism about growth. Like David Ledebuhr, Mike stresses that it is important for the processors to charge enough to cover all the certification costs.

### Burt's Hilltop Poultry

This USDA-inspected plant in Utica, Minnesota is currently not organically certified. The company was in recent years, but let the certification lapse because it was not getting enough organic birds – about 600 a year at the time – to cover the certification costs. Burt's strategy was to do all organic processing in the morning one day a week. Owner Joanne Burt said segregating organic birds from non-organic birds was the biggest problem because of the facility's small size. Joanne says she is thinking of recertifying because she sees growth potential in the organic marketplace. She is looking at MDA's organic certification cost-share program as a way to reduce the company's certification costs.



### Is this business for you?

Different processors have different experiences with organic certification. Often the impetus to seek organic certification comes from producers; potential customers may seek you out. In a few cases the producer has even paid for the certification. Here are some examples in Minnesota. Although these companies are all USDA-inspected, it is important to know that custom exempt and state-inspected plants may also become certified organic.

Minnesota Department of Agriculture  
625 Robert St. N., St. Paul, MN 55155, 651-201-6616

[www.mda.state.mn.us/esap/organic](http://www.mda.state.mn.us/esap/organic)

March 2005



Community Outreach and Assistance  
Partnership Program



Complied by Minnesota Department of Agriculture intern Michelle Menken from information provided by: Harriet Behar (independent organic inspector), Kevin Elfering (Minnesota Department of Agriculture), Jim Riddle (Organic Independents), Brenda Rogers (Minnesota Crop Improvement Association), Margaret Scoles (Independent Organic Inspectors Association), Connie Sperling (Oregon Tilth Certified Organic), Steve Walker (Midwest Organic Services Association). *Photos courtesy of the Montana Department of Agriculture.*

In accordance with the Americans with Disabilities Act, an alternative form of communication is available upon request. TTY: 1-800-6237-3529. This institution is an equal opportunity provider.