

C. Inspection Guide for Handlers

Inspectors verify the accuracy of your Handling Organic System Plan. They look at product profiles and ingredients, processing product flow, quality control, sanitation system and materials, pest control operations and raw and finished product storage. They look at packaging, lot numbering and organic labeling. In addition, inspectors do a sample audit of your organic production and will also tour the production facilities.

Inspectors report on your operation and identify issues of concern. Areas of concern for inspectors are those that have potential for contamination or commingling in receiving, raw ingredient storage, sanitation, pest control, process scheduling and organic process production.

If you're well organized and have a fairly straightforward operation, plan on a 3 to 5 hour inspection. Personnel who are responsible for various aspects of the organic operation should be available on the day of inspection. Allow more time for your first inspection or if you have a complex operation (wide variety of organic products, complex procedures, distant facilities).

HANDLERS

- Review and outline changes to previously submitted forms and documents (maps, product profiles, ingredients, equipment and product flow descriptions). This includes changes in suppliers. Be prepared to update the inspector on such changes.
- Have verification/documentation on how the previous year's conditions/requirements set by MOSA or any other organic certification agent have been addressed.
- Be prepared to respond to any Initial Review letter items needing attention at inspection.
- For Product Profiles: have labels, receipts, ingredient information, organic certification verification or affidavits for all inputs including organic ingredients, nonorganic ingredients, non-agricultural ingredients, flavors and processing aids.
- Have audit trail documentation accessible, showing how products are tracked from ingredient receiving through processing/handling, storage, product sale and shipping. Personnel that keep documentation at each stage of production need to be available at the inspection.
- Have support documentation available: pest management and employee training logs; quality assurance protocols and procedures; sales invoices; and composition and source information for pest control products, boiler chemicals, cleansers and sanitizers. Have verification of current organic certification for all certified organic ingredients and organic products received for further handling.
- Have current verification to show compliance with any National List restrictions for any nonorganic ingredients or processing aids.
- If organic and nonorganic products are handled in the same operation (parallel or split production), have records that show there is no commingling or contamination.
- Have current versions of the National Organic Standards and the MOSA Program Manual.
- Be prepared with the total dollar amounts of net sales (gross sales less cost of organic goods) made on certified products or services.
- Have current or proposed retail and non-retail labels for all products making an organic claim.
- Have current licenses and/or permits as required by other regulatory authorities.