

B. Recordkeeping Requirements for Producers

AUDIT TRAIL

Your audit trail refers to the records you keep that can trace a certified product from seed to market shelf. Creating and maintaining these records is required for certification. All records are to be maintained for five years and available at the time of your inspection.

MAPS OF LAND AND CROP STORAGE OR LIVESTOCK FACILITIES

Maps can be hand drawn or “official” (FSA/NRCS). Field maps need to have field numbers, acreages, boundaries, and adjoining land use clearly labeled. Indicate all areas that will require a buffer with a colored pencil or highlighter. Have maps for all fields under your management including conventional or transitional fields, both rented and owned. A separate map is preferred showing all facilities for crop/feed storage and livestock areas (both indoors and outdoors), but this may be indicated on the field maps if it can be clearly understood.

FIELD HISTORIES/PRIOR LAND USE DECLARATIONS

You need to have information in your file for the past three years’ inputs on land you’re requesting for certification. If you’re a new applicant and have managed the land for the past three years, you need to complete a *Three Year Field History* form and a *Crop Summary/Current Year Field Plan*. Conventional and transitional fields should be listed on all field documents. If you’re requesting certification for crops grown on land that has not been under your management for three years and the land was certified by another agency or no seeds were planted or off-farm inputs applied, a *Prior Land Use Declaration* may be used to describe the past three years of field histories. Pastures, in-ground greenhouse areas, maple woods, and wild cropped areas must be included on field histories.

FIELD ACTIVITY LOG

Field activity logs will vary depending on the type of operation you are managing. Logs should include all field activities with dates (plowing, soil preparation, planting and cultivation), application of inputs such as fertilizers, foliar feedings, pesticides, manure (with dates and rates); harvests and amounts harvested; and general observations on crops. Calendars, daily planners, notebooks or computers all work – whatever you prefer to keep the necessary information.

BUFFER MANAGEMENT RECORDS

If you harvest in a buffer zone, you need to keep a record of the harvest date(s), amount(s) and what you do with the buffer harvest(s). This can be done as part of a Field Activity Log or by using the *Nonorganic Crop Usage* form. If no prohibited applications are currently used on the cropped, pastured, or residential land adjacent to your organic cropland or pasture, and your neighbor signs a *Verification of Adjoining Land Use* form, no buffer is needed.

SEEDS, SEEDLINGS AND PLANTING STOCK

List all seed, annual seedlings, and planting stock on the *Seed Table* form. Vegetable producers may compile this information in an alternative format provided that all information requested on the *Seed Table* form is included. Your records will also need to include proof of organic status as applicable; receipts for all seed, seedlings, and planting stock showing the quantity purchased; tags or bags showing variety and treated/untreated status; and ingredient information for all inoculants or treatments not previously approved by MOSA.

If nonorganic seed or planting stock is used, complete an *Organic Search* form or have the catalogs you consulted (at least three) available for your inspector to view. For all nonorganic seed and planting stock, untreated documentation and non-GMO statements for all crops with GMO potential will also be verified by your inspector.

CROPS/INPUTS

A crop input is anything besides seeds, on-farm manure, or on-farm compost that is applied to land or crop, whether as fertilizer, inoculants, potting mix, foliar applications, lime or other minerals, or any product used on stored crops or feed. You need to provide MOSA with a *Crop Input Inventory* form listing all products used. List the exact brand name and manufacturer’s name for each input listed on your input inventory. If a product has not been approved by MOSA,

ingredients information needs to be provided prior to use. For fertilizers, we need an ingredients list, not analysis. Have all purchase records for inputs available at inspection. Keep a copy of your *Crop Input Inventory* for your records, updating as necessary.

CLEANING DOCUMENTATION

If any equipment or storage is used for both organic and nonorganic crops, you need to record how, when and who cleaned or purged before organic use or storage. This documentation must be completed for any buffer harvests and transportation of organic feed or crops. Your Field Activity Log or *Cleaning Log* form may be used.

STORAGE DOCUMENTATION

If you sell crops or feed your crops to livestock and also have conventional or transitional crops on the farm, a system must be used to identify the areas in which crops are stored on the farm and to keep track of quantities in storage. All bins, cribs, bunkers or other storage areas should have an identification (ID) number, letter or name, and be indicated on the farm maps and on the *Organic System Plan*. If many different crops are being stored in bins over the course of a season, the storage records should identify the field or fields from which the crops originated. A *Bin Inventory* form is available for your use. If you only raise organic crops for your own organic livestock, you also need to have all storage areas identified on your facility maps. Your harvest records should be sufficient to document how much feed went into storage. Have feed ration records available at inspection time.

LOT NUMBER SYSTEM

If you sell crops, you need a lot numbering system. Lot numbers assigned by you are used on your field or storage records, sales records and outgoing documents to maintain the tracking of your crop from seed to sale. The lot number should clearly identify the year of production, your initials, the last location of the crop (field # if sold directly from a field, or bin ID# if sold from a storage bin), the crop and the date it was shipped. If more than one load is shipped in a day, this could also be indicated. The lot number should be used on all weigh tickets, bills of lading, and invoices. Here is an example of a lot number which includes this information: 15-JD-5-C-1114-2

15	JD	5	C	1114	2
Year of Production	Producer Initials	Storage Bin or Field #	Crop = Corn	Shipped = Nov 14	Load #

SALES RECORDS

Sales records should include sales receipts, clean transportation verification, bills of lading (BOL) and other applicable documentation. Receipts and BOL should include the date of transaction, your name or farm name and the type of crops sold. Be sure to distinguish between organic crops and nonorganic crops. The receipt should also include the dollar amount for which the crop sold. You need to keep sales records for all crops grown in split production. This means you must keep sales records on conventional and transitional crops as well as the organic crop. The *Audit Control* form may be helpful in keeping these records. We will verify your sales annually at inspection.

LIVESTOCK/LIVESTOCK PRODUCTS

The records you keep must be able to trace an individual animal’s lineage and verify everything that goes in or on that animal.

INDIVIDUAL HERD HEALTH RECORDS

Individual herd health records must be established for each dairy animal that receives treatment. An index card or page in a notebook with corresponding animal ID (number, photo or name) can be used to record all lineage information, treatments, reproductive information, general comments, and ship or cull dates. These records are to be established at birth and kept for five years after the animal leaves the farm. Slaughter stock must have health records with reproductive information and specific treatments noted for individually identified animals or group treatment or events. Whole herd treatments such as vaccinations, physical alterations, and treatments given at the same stage of lactation or development can be recorded as whole herd health events. We require a list of the livestock (except

poultry) requested for certification with your initial application and that the list be updated annually thereafter at inspection.

POULTRY

Poultry operations should maintain records of hatching dates and source of chicks, proof of organic certification for purchased birds, batch records with corresponding batch number, vaccination schedule, treatments, mortality, production records and dates of provision for outdoor access.

FEED RATION

Record your overall rations and supplements and note when ration changes are made. Use seasonal feeding records to document pasture intake. Keep and have available at inspection, all records of purchased feed.

LIVESTOCK PURCHASES

Keep records of, and have available at inspection, any purchases of livestock for organic production. If you have split production of livestock or livestock products (such as both organically and conventionally raised slaughter animals of the same type), record any conventional purchases as well.

LIVESTOCK INPUTS

A livestock input is anything, besides the feed you grow or purchase, that goes in or on your livestock. This includes feed supplements, minerals, additives or inoculants; pest treatments; wound treatments; health treatments or preventatives; or cleaning products. Provide MOSA with ingredients information for any product used. List the exact brand name and manufacturer's name for each input listed on your input inventory. If a product has not been approved by MOSA, ingredients information needs to be provided prior to use. Keep a copy of the *Livestock Input Inventory* form for your records and keep it up-to-date.

LIVESTOCK SALES

Keep all sales records for organic livestock and livestock products and have available for inspection. If you sell both organically and conventionally, keep records for both. When you sell an animal that was treated with a prohibited substance, keep records of these sales and remember to contact the office to report use.