



Handler Organic System Plan

Account # _____

Name: _____

Date: _____

Year: _____

GENERAL INFORMATION NOS §205.406(a)

1. If you are the contract or subcontract operator for others, what services do you provide and to whom? *Examples include on-farm processing, feed processing, meat processing, co-manufacturing, etc. Note NA if not applicable.*

2. Describe government permits/licenses/inspections that are in effect for your operation. *Certified organic operations must comply with all applicable Federal, State, and local regulations.*

3. INTERNATIONAL REQUIREMENTS

Imported organic products have a higher organic integrity risk. Additional audit trail documentation will be required to verify organic status and to show that products were not treated upon entry to the US. *Import certificates are required for all imports as of March 19, 2024.*

Imported and/or exported organic products may fall under an Organic Equivalency Arrangement and have additional requirements.

Do you purchase or are you the first certified organic operation in the US to receive any imported organic ingredients or products grown or processed outside of the US? *Import certificates are required for all imports as of March 19, 2024. Be sure to add import information to your Organic Ingredients and Processing Aids (OIPA) form.*

☐ Yes ☐ No

4. If yes, are you ever the importer of record?

☐ Yes
☐ No, I solely purchase ingredients from importers or suppliers.

5. Are importers/suppliers located in the US? Note: *you must maintain audit trail documentation back to the last certified organic entity. Import certificates will be required for all imports as of March 19, 2024.*

☐ Yes, located in US
☐ No, located outside US

6. Is the importer certified organic? *Importers must be certified by March 19, 2024.*

☐ Yes
☐ No
☐ Both

7. If you export organic products, how do you verify that they meet international or other additional verification requirements? *You must ensure that all certificates are current and complete, listing the specific products you source and any applicable export market compliance.*

8. For all organic products exported, how do you verify that the product labels are compliant with a trade arrangement or the country’s labeling requirements?

9. **CONTRACT HANDLERS:**

Do you use Contract Handlers?

☐ **Yes** ☐ **No**

10. If yes, check all that apply.

Exempt Contract Handlers: Exempt handlers include operations that receive organic product enclosed in a sealed, tamper-evident package or container, and do not repackage or otherwise handle the product. Exempt handlers do not need to be certified. Complete and submit the **Exempt (formerly Excluded) Handler form** or *upload a copy to your MyMOSA files.*

Certified Contract Handlers: Contract handlers who provide most types of handling or processing services to your company **must** be certified organic. Examples of handling activities that need to be certified include selling, processing, packaging, trading, facilitating sale or trade on behalf of a seller, importing, exporting for sale, combining, aggregating, culling, conditioning, treating, packaging, containerizing, repacking, labeling, storing, receiving or loading. *Submit a current copy of the handler's certificate.*

☐ **Exempt Contract Handlers**

☐ **Certified Contract Handlers**

11. Provide the name, phone number, certification agency (unless exempt, see above and indicate n/a), and type of process/handling service each contract handler provides in the table below.

*All products stored must be listed on the table in the storage section of your OSP.

Contract Handlers

Name and Phone Number	Certifier	Type of processing/handling*

Additional Comments:

24HANDOSP1F.doc

Handler OSP

Effective Date: 1/1/2024

MONITORING SUPPLIERS and ORGANIC PRODUCT COMPOSITION NOS

§§205.103, .105, .301 .302, .605, .606

The National Organic Standards require that all raw or processed agricultural products sold, labeled or represented as "100 percent organic," "organic" or "made with organic (specified ingredients or food group(s))," and all organic ingredients in multi-ingredient agricultural products with less than 70% organically produced ingredients must be handled in compliance with all applicable organic standards. For processed products labeled as "organic" on the principal display panel, all agricultural ingredients must be certified organic or on the National List. Nonorganic ingredients and processing aids used must be allowed on the National List per §205.605 and §205.606, and must not comprise more than 5% of the finished product (excluding water and salt). All annotations and restrictions for ingredients used from the National List must be followed, and commercial unavailability documented when applicable.

Products making "100% organic," "organic" or "made with..." claims may not contain ingredients or processing aids subject to ionizing radiation or genetically engineered organisms and their derivatives, nor ingredients produced using sewage sludge. National Organic Standard §205.301 outlines other label-claim-specific and product composition requirements. National Organic Standard §205.2 defines an ingredient as any substance used in the preparation of an agricultural product that is still present in the final commercial product as consumed.

12. **INGREDIENTS:** Submit completed **Organic Product Profiles** for multi-ingredient products requested for certification. All organic ingredients, and single-ingredient products requested for certification must be listed on the **Organic Ingredient and Processing Aids (OIPA)** form. Ingredient labels and/or specification sheets, as applicable, must also be provided for all ingredients.

What is your procedure for sourcing organic agricultural ingredients?

13. How do you verify certification of organic ingredients (including necessary supply chain documentation)?

14. How often do you switch suppliers, add new suppliers, or do spot purchasing to prevent shortages?
Frequent changes may result in increased audit trail verification at inspection.

15. How frequently do you review organic certificates for existing suppliers to ensure they are complete and current? *Operations must review certificates annually for active suppliers, at a minimum.*

16. Do you purchase organic ingredients from exempt suppliers (E.g. operations that only receive, store, and/or prepare for shipment products that are in sealed, tamper-evident packages or containers, but do not otherwise handle organic agricultural products)? *Sourcing through exempt suppliers requires additional audit trail verification at inspection. Supply chain verification must be provided back to the last certified handler.*

☐ **Yes** ☐ **No**

17. If yes, how will you ensure that only certified organic ingredients are sourced by the exempt supplier? *Submit an Organic Ingredients and Processing Aids form listing all suppliers. Audit trail records must link directly back to the last certified operation.*

Check all that apply

- ☐ **I do not place an order until the certified supplier is identified by the exempt handler and I have determined the organic certificate is legitimate and complete.**
- ☐ **For any delivery that cannot be traced back to the certified supplier, I refuse or hold shipment until the certified supplier is verified.**
- ☐ **Other**

18. If "other," explain:

19. How do you verify that ingredients and other inputs used have not been produced using genetic engineering, sewage sludge, or ionizing radiation and that National List annotations are followed?

20. Do any nonorganic ingredients used have annotations/restrictions for their use on the National List?

- ☐ **Yes**
- ☐ **No**
- ☐ **NA**

21. If "yes," describe how you meet compliance. *If you are uncertain about how to meet these requirements, please contact MOSA.*

22. **PROCESSING AIDS:** Reference the definition of Processing Aid in NOS §205.2. Processing aids must be noted on the **Organic Product Profile** submitted for each product requested for certification. Submit processing aid labels and/or specification sheets, as applicable.

Do you use processing aids? *If no processing aids are used, skip to the Other Materials Section.*

- ☐ **Yes** ☐ **No**

23. If "yes," list what processing aids are used, and describe how and why they are used.

24. If any processing aids used have annotations/restrictions for their use on the National List, describe compliance.

25. Are any processing aids **not** on the National List? If "yes," explain.

26. How do you verify that processing aids used have not been produced using genetic engineering, sewage sludge, or ionizing radiation and that National List annotations are followed?

27. **WATER:** Water used in processing/handling must meet potable water standards. For products that use culinary steam, boiler additives must not contaminate the organic products. List boiler additives on the **Handler Input Inventory** and submit product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA.

How is water used in processing? *Check all that apply.*

- | | |
|---|--|
| <input type="checkbox"/> not used | <input type="checkbox"/> organic product cleaning |
| <input type="checkbox"/> ingredient | <input type="checkbox"/> equipment cleaning |
| <input type="checkbox"/> processing aid | <input type="checkbox"/> other |
| <input type="checkbox"/> cooking | |
| <input type="checkbox"/> cooling | |
| <input type="checkbox"/> product transport | |

28. If "other," explain.

29. List all sources of water (e.g. municipal, on-site well). *Submit a **water test** for Coliform bacteria and nitrates for nonmunicipal water sources.*

30. List any known water contaminants.

31. What on-site water treatment processes are used? (e.g. filtration (specify type), chlorination (specify where used), softening.)

32. Do you use water conservation strategies?

☐ **Yes** ☐ **No**

33. How, and how often, do you monitor water quality?

34. Is culinary steam used that has contact with organic product, processing equipment, or packaging? *If yes, submit a label listing active ingredients for all boiler chemicals in use.*

☐ **Yes** ☐ **No**

35. Are any of the following used to prevent and/or monitor contamination from boiler additives? *If volatile boiler chemicals are used, submit documentation from the chemical manufacturer that the chemical does not carry over in the steam. Check all that apply.*

- ☐ **steam filters**
- ☐ **condensate traps**
- ☐ **testing of condensate**
- ☐ **testing of finished products**
- ☐ **other (blow-down process, turning off chemical injection system, purging the system, etc.)**

36. If "other," explain.

ORGANIC MANUFACTURING AND HANDLING PRACTICES (product flow, sanitation) NOS §§205.201, .272

Procedures, processes, storage and equipment must prevent risk of commingling organic and nonorganic products, and prevent contamination from prohibited substances present in the facility. Procedures used

to maintain organic integrity must be documented. Organic Control Points (OCPs) are areas in the production system where organic integrity may be compromised. Your organic system plan must determine where contamination is most likely to occur and show how contamination will be prevented.

37. PRODUCT FLOW:

Provide a written description below showing how and where ingredients/products are received, stored, processed, packaged, and warehoused, and identifying all equipment used, storage areas, and where ingredients are added or processing aids used. Include OCPs in the product flow description. A schematic product flow chart may be submitted to provide this information. If you have a formal OCP plan that contains information beyond what we ask here, please submit that plan.

38. EQUIPMENT: To prevent commingling and contamination, all equipment used in organic production or handling must be free of nonorganic product and prohibited materials. Equipment used for both organic and nonorganic processing or handling must be cleaned and/or flushed prior to use on organic products. Keep records of cleaning and flushing activities. Submit facility **map(s)** showing equipment location and areas used for organic processing, packaging, or storage.

Describe cleaning methods for equipment used in processing (including sweeping, scraping, vacuuming, compressed air, manual washing, clean in place (CIP), steam cleaning, sanitizing) used prior to organic production runs (or submit Sanitation Standard Operating Procedures (SSOPs) if desired). *Products used for equipment cleaning and sanitation must be listed on the **Handler Input Inventory**. Submit product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA.*

39. Describe purge procedures, quantities purged, and purging documentation. If no equipment purging is done, note "N/A".

40. Are all surfaces that contact organic products food grade?

☐ **Yes** ☐ **No**

41. If "no," explain.

42. GENERAL SANITATION: Good sanitation practices must be used throughout the facility. Residues from cleaning materials must not contaminate organic products. List all cleansers and sanitizers used in the processing facility on the **Handler Input Inventory** and submit product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA.

How is sanitation handled?

- ☐ **in-house**
☐ **by outside contractor**
☐ **both**

43. Provide the name of your in-house sanitation officer or contract cleaning service, and their contact information including address and phone number.

44. Describe general facility sanitation methods used prior to organic production runs (or attach SSOPs if applicable).

45. Are any cleansers/sanitizers listed as restricted or prohibited by the National List? *List inputs on the Handler Input Inventory.*

☐ Yes ☐ No

46. What measures are in place to ensure that the residues of cleanser/sanitizers and/or nonorganic food matter do not remain on processing equipment and/or containers when organic processing occurs?

Check all that apply.

- ☐ **pH testing of rinsate**
- ☐ **residue testing on food contact surfaces**
- ☐ **use of sanitizer with ingredients on the National List**
- ☐ **purge/flush**
- ☐ **mechanical cleaning**
- ☐ **other**

47. If "other," explain.

48. If testing is done, describe the type of test(s) and sensitivity level(s) of testing materials.

49. How, and how often, is general sanitation monitored?

50. Where are cleaning/sanitizing materials stored?

ORGANIC MANUFACTURING AND HANDLING PRACTICES (transport) NOS

§§205.201, .272

51. INCOMING TRANSPORT:

Records must demonstrate prevention of commingling and contamination during transportation.

In what forms are incoming products received? *Check all that apply.*

- | | |
|---|---|
| <input type="checkbox"/> dry bulk | <input type="checkbox"/> cardboard drums |
| <input type="checkbox"/> liquid bulk | <input type="checkbox"/> paper bags |
| <input type="checkbox"/> tote bags | <input type="checkbox"/> foil bags |
| <input type="checkbox"/> tote boxes | <input type="checkbox"/> pails |
| <input type="checkbox"/> metal drums | <input type="checkbox"/> plastic crates |
| | <input type="checkbox"/> cardboard cases |
| | <input type="checkbox"/> mesh bags |
| | <input type="checkbox"/> other |

52. If "other," explain.

53. How are incoming products transported?

- ☐ **tanker**
- ☐ **trailer**
- ☐ **common carrier**
- ☐ **rail**
- ☐ **self**
- ☐ **barge/ship**
- ☐ **other**

54. If "other," explain.

55. Who arranges incoming product transportation?

56. How do you ensure that incoming transport units were cleaned prior to loading organic products?

57. Is this inspection/cleaning process documented?

- ☐ **Yes** ☐ **No**

58. Are incoming transport units used to carry any prohibited substances?

- ☐ **Yes** ☐ **No**

59. Have transport companies been notified of organic handling requirements?

- ☐ **Yes** ☐ **No**

60. Are organic products shipped at the same time as nonorganic in the same transport units?

- ☐ **Yes** ☐ **No**

61. What steps are taken to segregate organic products? *Check all that apply.*

- ☐ **dedicated organic only**
- ☐ **pallets**
- ☐ **pallet tags**
- ☐ **organic product shrink-wrapped**
- ☐ **separate area in transport unit**
- ☐ **other**

62. If "other," explain.

63. **IN-PROCESS TRANSPORT:**

How are in-process products safeguarded from contamination/commingling? *Check all that apply.*

- ☐ **dedicated organic production**
- ☐ **organic production run first thing**
- ☐ **organic production on specific days**
- ☐ **separate production lines**
- ☐ **dedicated organic transport**
- ☐ **dedicated organic storage**
- ☐ **other**

64. If other, explain.

65. How do you ensure that in-process transport units are cleaned prior to loading organic products?

66. Is this inspection/cleaning process documented?

☐ **Yes** ☐ **No**

67. Do organic products leave your facility for further processing?

68. Are unpackaged products transloaded between carriers during transport? *Any transloading where loads are split, combined, treated, sorted, containerized, packed/repacked, opened, enclosed, labeled/relabelled, or otherwise handled must be certified. Transloading of your shipment between modes of transport equipment may not need to be certified if your load and only your load is moved from one form of transport to another.*

☐ **Yes Provide organic certificate(s) for transloading operations.**

☐ **No**

69. Are interim labels used while the product is in process of production? (job#/work orders or other labels applied)

70. If nonorganic production occurs at the same time as organic production how do you prevent contamination or commingling?

71. **OUTGOING FINISHED PRODUCT TRANSPORT:**

In what form are finished products shipped? *Check all that apply.*

☐ **dry bulk**

☐ **liquid bulk**

☐ **tote bags**

☐ **tote boxes**

☐ **paper bags**

☐ **foil bags**

☐ **metal drums**

☐ **mesh bags**

☐ **cardboard drums**

☐ **cardboard cases**

☐ **plastic crates**

☐ **pails**

☐ **other**

72. If "other," explain.

73. How are outgoing products transported? *Check all that apply.*

☐ **tanker**

☐ **trailer**

☐ **common carrier**

☐ **rail**

☐ **self**

☐ **other**

74. If "other," explain.

75. Who arranges outgoing product transportation?

76. How do you ensure that outgoing transport units are clean prior to loading organic products?

77. Is this inspection/cleaning process documented?

☐ Yes ☐ No

78. Are outgoing transport units used to carry any prohibited materials?

☐ Yes ☐ No

79. Have transport companies been notified of organic handling requirements?

☐ Yes ☐ No

80. Are organic products shipped at the same time as nonorganic in the same transport units?

☐ Yes ☐ No

81. What steps are taken to segregate organic products? *Check all that apply.*

- ☐ **dedicated organic only**
- ☐ **pallets**
- ☐ **pallet tags**
- ☐ **organic product shrink-wrapped**
- ☐ **separate area in transport unit**
- ☐ **other**

82. If "other," explain.

ORGANIC MANUFACTURING AND HANDLING (storage, quality assurance) NOS §§205.201, .272

83. **STORAGE INFORMATION:** Provide information for all storage areas/facilities in use. Off-site storage facilities must be certified organic, or exempt from certification. A storage facility that receives organic products that are enclosed in sealed, tamper-evident packages or containers and does not repackage or otherwise handle the product does not need to be certified. The **Exempt (formerly Excluded) Handler** form must be completed for such facilities. Storage areas must be indicated on facility **map(s)**. Contact MOSA to determine if storage qualifies for exemption.

List all storage areas in the table below.

Under "Location" note if it is on-site or off-site and list the name of the off-site handler, as applicable.

Handler storage information

Use/Product Stored	Location	Type of storage	Certified Under	For organic use only?	How is contamination prevented in this area?

Additional Comments:

84. **WASTE MANAGEMENT PLAN:** Waste products sold as organic must be certified. Some examples of waste products include whey from cheese making, grain cleanings from seed conditioning, meal from oilseed processing, or water used in processing or cleaning.

Will any waste or by-products from production be sold as certified organic? *If "yes," submit an **Organic Product Profile** for each product.*

☐ **Yes** ☐ **No**

85. How do you manage waste from expiration, spoilage, or inadequate quality testing? *Check all that apply.*

- | | |
|--|--|
| <input type="checkbox"/> on-site dumpster | <input type="checkbox"/> daily pickup of waste |
| <input type="checkbox"/> material recycling | <input type="checkbox"/> sediment ponds |
| <input type="checkbox"/> water recycling | <input type="checkbox"/> application to organic land |
| <input type="checkbox"/> water filtering | <input type="checkbox"/> application to nonorganic land |
| <input type="checkbox"/> smokestack filters | <input type="checkbox"/> other |
| <input type="checkbox"/> composting | |

86. If "other," explain.

87. What organic waste products are generated by your operation, and what records are used to track the type/volume of waste product?

88. How do you account for organic waste product loss, and/or adjust inventory to reflect organic waste?

89. How do you account for organic product shrinkage and how much volume (in %) is lost during production? (Such as during milling, maple syrup production, etc.)

90. **EDUCATION AND TRAINING:** All personnel should receive appropriate training to maintain food safety and organic integrity.

How many people are employed at your organic production facility(s)?

91. Describe procedures ensuring personnel have appropriate training in organic handling practices and general food handling/protection.

92. Is this training documented?

☐ **Yes** ☐ **No**

93. **QUALITY ASSURANCE:**

Do you have a QA program in place? If so, which program do you use (HACCP, HARPC, TQM, etc.)?

94. Are any outside quality assessment services used? If so, list name of assessment company.

95. Indicate type(s) of product testing used. *Check all that apply.*

- ☐ **ingredients prior to purchase**
- ☐ **finished product**
- ☐ **product during production**
- ☐ **ingredients upon receipt**
- ☐ **none**

96. Are ingredient samples retained? If so, for how long?

97. Are finished product samples retained? If so, for how long?

98. Indicate any other means to monitor product quality and/or the effectiveness of your organic management plan.

99. Describe product recall system, or attach product recall plan.

100. Do you anticipate any changes to your quality assurance system? If yes, describe.

101. Specify any type(s) of environmental testing conducted.

102. **ADDITIONAL PRECAUTIONS:**

Are any other means not described above taken to ensure that organic integrity is maintained?

☐ **Yes** ☐ **No**

103. If "yes," list organic compliance plans and organic integrity protection methods.

PEST MANAGEMENT NOS §§205.201, .271, .272

The National Organic Standards require that pest management is primarily handled by preventive methods as noted in NOS §205.271. When these are not effective, non-synthetic or synthetic substances allowed for organic processing and handling may be used. If prevention and allowed materials are not effective, any substance may be used for pest management, provided it is used in compliance with legal restrictions, and provided the operator and MOSA agree on the substance used, methods of application, and measures taken to maintain organic integrity. Substances must be applied in a manner that prevents contamination of ingredients or finished products to be sold, labeled or represented as organic. All treatments used must be justified. A pest management plan must be in place for each facility operated, and a program of regular preventive monitoring must be a part of this plan to show that a previously allowed material is still needed.

104. **GENERAL INFORMATION:**

How is pest control handled?

- ☐ **in-house**
- ☐ **outside contractor**
- ☐ **both**

105. Provide the name of your in-house pest control officer or contract pest control service, and their contact information including address and phone number. How do you work with your pest control provider to ensure the required steps have been followed?

106. What pest problems do you generally have? *Check all that apply.*

- | | |
|--|---------------------------------------|
| <input type="checkbox"/> flying insects | <input type="checkbox"/> mice |
| <input type="checkbox"/> crawling insects | <input type="checkbox"/> other |
| <input type="checkbox"/> spiders | |
| <input type="checkbox"/> birds | |
| <input type="checkbox"/> rats | |

107. If "other," explain.

108. **PEST MANAGEMENT PRACTICES:** Submit a facility **map** showing the location of traps and monitors. List all pest control products on the **Handler Input Inventory**. Submit product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA.

Check all pest management practices used. *Check all that apply.*

- | | |
|--|--|
| <input type="checkbox"/> good sanitation | <input type="checkbox"/> mechanical traps |
| <input type="checkbox"/> removal of exterior habitat/food sources | <input type="checkbox"/> scare eye balloons |
| <input type="checkbox"/> cleanup of spilled product | <input type="checkbox"/> nitrogen |
| <input type="checkbox"/> sealed doors and/or windows | <input type="checkbox"/> freezing treatments |
| <input type="checkbox"/> exclusion | <input type="checkbox"/> heat treatments |
| <input type="checkbox"/> repair of holes, cracks, etc. | <input type="checkbox"/> vacuum treatments |
| <input type="checkbox"/> screened windows, vents, etc. | <input type="checkbox"/> carbon dioxide |
| <input type="checkbox"/> sheet metal on sides of building exterior | <input type="checkbox"/> vitamin baits |
| <input type="checkbox"/> physical barriers | <input type="checkbox"/> pyrethrum |
| <input type="checkbox"/> mowing | <input type="checkbox"/> ryania |
| <input type="checkbox"/> air curtains | <input type="checkbox"/> rotenone |
| <input type="checkbox"/> air showers | <input type="checkbox"/> boric acid |
| <input type="checkbox"/> positive air pressure in facility | <input type="checkbox"/> disodium octaltetrahydrate |
| <input type="checkbox"/> monitoring | <input type="checkbox"/> diatomaceous earth |
| <input type="checkbox"/> ingredient inspection for pests | <input type="checkbox"/> precipitated silica |
| <input type="checkbox"/> inspection zones around interior perimeter | <input type="checkbox"/> fumigation |
| <input type="checkbox"/> ultrasound/light devices | <input type="checkbox"/> fogging |
| <input type="checkbox"/> sticky traps | <input type="checkbox"/> crack and crevice spray |
| <input type="checkbox"/> beneficials/natural predators | <input type="checkbox"/> other |
| <input type="checkbox"/> electrocutors | |
| <input type="checkbox"/> pheromone traps | |

109. If "other," explain.

110. Are your pest prevention methods and structural pest management system effective to prevent or control pests?

☐ **Yes** ☐ **No**

111. If "no," explain.

112. Are records kept of your monitoring activities?

☐ **Yes** ☐ **No**

113. How often do you inspect your pest prevention system?

114. What changes do you anticipate to your pest management system?

115. **PESTICIDE USE:** List all pest control substances including baits, sprays, pesticides, or fumigants on the **Handler Input Inventory**. Submit product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA.

Are pesticides used? *If "no," skip to Audit Trail and Inventory Control System Section.*

☐ **Yes** ☐ **No**

116. Are any products used which are prohibited by the National List?

☐ **Yes** ☐ **No**

117. If "yes," did you contact MOSA for approval prior to product use?

☐ **Yes** ☐ **No**

118. Indicate type of pesticide management records maintained, including pesticide applications.

119. Describe methods to prevent pesticide contamination of organic ingredients, finished products, or packaging materials.

120. Describe your plan to reduce or prevent pest control product use in the future.

121. Where are pest control substances stored?

AUDIT TRAIL AND INVENTORY CONTROL SYSTEM NOS §§205.103, .201

Audit trail and inventory control procedures must be adequate to trace all ingredients and products from the last certified organic operation through the entire handling system, including packaging and storage, and on through distribution, sales and transport, using labeling, lot numbers, date codes, or a similar product tracking system. Organic handlers must retain valid proof of certification for all organic ingredients. Amounts of organic finished products must balance with purchased certified organic and other allowed ingredients (loss to shrinkage or spoilage should be documented). External audit trail documentation must identify organic products as "100% organic," "organic," or "made with organic (specified ingredients or food group(s))," as appropriate. Operations may use abbreviations or acronyms to identify products, provided that the abbreviations or acronyms are easily understood. Documents in your audit trail must be able to link to those preceding and following them in the record system. If lot

numbers and/or other unique identifiers on documents change as products move through your operation, documents must remain auditable so product is traceable.

122. What documents do you use to track ingredients and products at **receiving**? *Check all that apply. Please have all records identified in this section available at inspection. Submit sample records needed to show traceability.*

- | | |
|---|---|
| <input type="checkbox"/> purchase orders | <input type="checkbox"/> receiving summary log |
| <input type="checkbox"/> bills of lading | <input type="checkbox"/> invoices |
| <input type="checkbox"/> certificates of analysis | <input type="checkbox"/> organic certificates |
| <input type="checkbox"/> receiving records | <input type="checkbox"/> sales receipts |
| <input type="checkbox"/> customs forms | <input type="checkbox"/> quality test results |
| <input type="checkbox"/> organic import certificates | <input type="checkbox"/> scale tickets |
| <input type="checkbox"/> phytosanitary forms | <input type="checkbox"/> clean transport |
| <input type="checkbox"/> transaction certificates | <input type="checkbox"/> inspection forms |
| | <input type="checkbox"/> shipping logs |
| | <input type="checkbox"/> receiving manifests |
| | <input type="checkbox"/> other |

123. If "other," explain.

124. What documents do you use to track ingredients and products while **in process**? *Check all that apply.*

- | | |
|---|---|
| <input type="checkbox"/> sanitation logs | <input type="checkbox"/> quality assurance reports |
| <input type="checkbox"/> production summary logs | <input type="checkbox"/> equipment cleaning logs |
| <input type="checkbox"/> blending reports | <input type="checkbox"/> other |
| <input type="checkbox"/> packaging reports | |
| <input type="checkbox"/> production reports | |
| <input type="checkbox"/> ingredient inspection forms | |

125. If "other," explain.

126. What documents do you use to track ingredients and products while in **storage**? *Check all that apply.*

- | |
|--|
| <input type="checkbox"/> ingredient inventory report |
| <input type="checkbox"/> finished product inventory reports |
| <input type="checkbox"/> other |

127. If "other," explain.

128. What documents do you use to track ingredients and products at **shipping**? *Check all that apply.*

- | |
|--|
| <input type="checkbox"/> shipping logs |
| <input type="checkbox"/> sales receipts |
| <input type="checkbox"/> other |

129. If "other," explain.

130. Describe your lot numbering or unique identification system and your use of any abbreviations or acronyms.

131. Describe how lot numbers and/or other unique identifiers link documents to enable traceability.

132. Does your outgoing shipping documentation identify the organic products as "100% percent organic," "organic," or "made with organic (specified ingredients or food group(s))"?

☐ **Yes** ☐ **No**

133. What other types of records do you maintain? *Check all that apply.*

☐ **ingredient verifications**

☐ **input labels/composition list**

☐ **equipment cleaning records**

☐ **labor records**

☐ **inventory**

☐ **pest control log**

☐ **documentation showing lack of commercial availability**

☐ **waste records**

☐ **residue tests**

☐ **other**

134. If "residue tests" or "other," explain.

135. Can your recordkeeping system track the finished product in the marketplace back to all ingredients?

☐ **Yes** ☐ **No**

136. Can your recordkeeping system balance organic product in and organic product out?

☐ **Yes** ☐ **No**

137. Can your recordkeeping system verify prevention of contact with prohibited substances?

☐ **Yes** ☐ **No**

138. If you answered no to any of the above three questions, what changes will you make to ensure these areas can be tracked/verified?

139. The National Organic Standards require that you keep a copy of all certification documents for a minimum of 5 years. How do you intend to maintain these records?

☐ **hard copy**

☐ **electronically**

☐ **both**

PACKAGING AND LABELING NOS §§205.201, .272, .303 - .311

The National Organic Standards require that packaging materials be free of prohibited substances and must not contaminate the organic product. Organic product labels must meet State and Federal labeling requirements as well as requirements specifically outlined in NOS §205.303-.311. All labels making an organic claim must be approved prior to use. Submit color labels if colored labeling is used.

Nonretail labels must identify the product as organic, and include the production lot number, shipping identification, or other unique identification that links the container to audit trail documentation on all containers and packages, regardless of shape, size, or use, used to ship or store organic products. Nonretail labeling requirements do not apply to nonretail containers used to ship or store agricultural products packaged for retail sale with organic identification visible on the retail label.

Retail products labeled as "100% organic," "organic," "made with organic (specified ingredients or food group(s))," or livestock feed products, must identify the certified handler or product distributor on the information panel, followed below by "Certified Organic by MOSA." Organic ingredients must be identified as organic in ingredient listings on products labeled "100% organic," "organic" or "made with organic (specified ingredients or food group(s))." See the NOS for complete labeling requirements/options and contact MOSA as needed for clarification.

140. PACKAGING:

What types of packaging material are used? *Check all that apply.*

- | | |
|---|---|
| <input type="checkbox"/> bulk | <input type="checkbox"/> waxed paper |
| <input type="checkbox"/> paper | <input type="checkbox"/> aseptic |
| <input type="checkbox"/> cardboard | <input type="checkbox"/> natural fiber |
| <input type="checkbox"/> wood | <input type="checkbox"/> synthetic fiber |
| <input type="checkbox"/> glass | <input type="checkbox"/> other |
| <input type="checkbox"/> metal | |
| <input type="checkbox"/> foil | |
| <input type="checkbox"/> plastic | |

141. If "other," explain.

142. Are all packaging materials food grade?

☐ **Yes** ☐ **No**

143. Where are packaging materials stored?

144. Have any packaging materials been exposed to materials such as sanitizers, fungicides, preservatives, fumigants or pest control materials in storage, contained in material, or otherwise? If so, describe exposure. *Indicate materials used on the Handler Input Inventory or NOIPA form as appropriate.*

145. Are packaging materials reused? If so, describe how these are cleaned prior to use. *All recycled packaging materials must be thoroughly cleaned prior to use and pose no risk to organic integrity.*

146. What changes do you anticipate in your packaging?

147. **LABELING:** All labels making an organic claim must be approved by MOSA prior to use. Submit copies of new labels and label changes to MOSA for review and approval. Submit color labels if colored labeling is used.

Do you use or plan to use labels that make an organic claim?

☐ **Yes** ☐ **No**

148. Will labels making an organic claim and bearing your business name be applied at a facility other than your certified operation?

☐ **Yes** ☐ **No**

149. If Yes, provide the operation(s) that will be applying your labels that make an organic claim. *Facilities that apply labels that make an organic claim must be certified organic. Submit organic certificates as applicable.*

150. If you make/use labels for organic products, describe the type of labels used (retail, nonretail, etc.).
Note N/A if not applicable.

151. Describe your system for verifying that all labels making an organic claim comply with the National Organic Standards. *Note N/A if not applicable.*

152. Do you use or plan to use the USDA seal and/or the MOSA logo on product labels or marketing information?

☐ **Yes** ☐ **No**

153. Where do you make or plan to make an organic claim or use the USDA seal or logo?

- ☐ **website**
- ☐ **brochures**
- ☐ **signs**
- ☐ **advertising materials**
- ☐ **other**
- ☐ **none**

154. If other, explain.

155. **PRIVATE LABELING:** Private label arrangement authorization is required if MOSA is listed as the certifier on the label and the company on the label is not MOSA certified. Private label arrangement authorization requires an administrative fee and submission of the **Private Label Arrangement** form. *Such labels may not be applied at a facility that MOSA does not directly certify.*

Do you have any private labeling plans?

☐ **Yes** ☐ **No**

156. If "yes," list what company(s) will be displayed on the label(s), and what certifier(s) will be displayed on the label(s). *All labels making an organic claim must be submitted to MOSA and approved prior to use. Submit color labels if colored labeling is used.*

157. **OTHER MATERIALS:** Disclose any materials or inputs used in your organic production that may contact organic products or equipment used for organic production that are not otherwise disclosed in other sections of this OSP. (ex: contact substances)

158. **COMPLETE:** Is your Organic System Plan complete?

☐ **Yes** ☐ **No**