



Non-Processing Handler Organic System Plan

GENERAL INFORMATION NOS §205.406(a)

Complete this form if you are seeking certification as a broker, trader, wholesaler, brand holder, distributor, importer or exporter of organic products that you do not process, repack (combine or split), label, relabel or apply any substance to.

If you are involved in additional handling activities such as processing, packaging, labeling, transloading of bulk product, or storing product in permeable packaging, then a different form (Handler Organic System Plan) is required.

1. Select all that describe your business:

- Broker**
- Trader**
- Wholesaler**
- Distributor**
- Private Label Brand Holder or Private Label Owner**
- Importer and/or exporter of packaged organic product in sealed containers**
- Importer and/or exporter of unpacked organic product in bulk vessels**
- Exclusive sales agent for _____**
- Other**

2. If "Exclusive sales agent," note operation name here:

3. If "other," explain:

4. Select all that describe your organic product handling activities:

- I take title to/ownership of organic products**
- I take physical possession of organic products**
- I drop ship organic products to customers directly from suppliers**
- I arrange sales of organic product between buyers and sellers without taking title or possession of organic products**
- Other**

5. If "other," explain:

6. Describe your activities in detail:

7. Describe required government permits/licenses/inspections for your operation. *Certified organic operations must comply with all applicable federal, state, and local regulations.*

8. CONTRACT HANDLERS:

Do you use Contract Handlers?

- Yes** **No**

9. 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**

10. 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:

11. INTERNATIONAL REQUIREMENTS

Imported organic products have a higher organic integrity risk. Additional audit trail documentation will be required to verify the organic status and to show that products were not treated upon entry to the US. Import certificates will be 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? Be sure to add import information to your OIPA form. *Import certificates will be 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**
- Both**

12. If yes, are you the importer of record?

- Yes**
- No, I purchase ingredients from importers or suppliers**
- Both**

13. 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
 Both

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

- Yes**
 No
 Both

15. 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.*

16. 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?

MONITORING SUPPLIERS and ORGANIC PRODUCT COMPOSITION NOS §§205.103, .105, .301 .302

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 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.

17. Are you responsible for ingredient procurement or formulation of products that you sell?

If yes, answer questions 18 and 19 below

If no, skip to question 20 below

- Yes** **No**

18. Please describe your process for verifying that organic and nonorganic ingredients are compliant.

19. Describe what ingredient verification information (organic certificates, nonorganic ingredient verification) you are responsible for supplying to your copacker.

20. Who at your company is responsible for approving new organic suppliers? *Prior to purchasing, you must verify certification of the supplier, unless exempt, and the organic status of the ingredient(s) or product(s).*

21. 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.*

22. 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.*

23. 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**

24. 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

25. If "other," explain:

ORGANIC HANDLING PRACTICES (product flow, integrity maintenance) 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.

26. PRODUCT FLOW:

Provide a written description below showing how and where ingredients/products are received, stored, packaged, and warehoused. *Include OCPs in the product flow description. A schematic product flow chart may be submitted to provide this information.*

27. TRANSPORT:

Records must demonstrate prevention of commingling and contamination during transportation.

In what forms are ingredients and/or products transported? *Check all that apply.*

dry bulk

liquid bulk

tote bags

tote boxes

metal drums

cardboard drums

cardboard cases

plastic crates

paper bags

foil bags

pails

mesh bags

other

28. If "other," explain:

29. How are products transported?

tanker

trailer

common carrier

rail

self

barge/ship

other

30. If "other," explain:

31. Are unpackaged products transloaded between carriers during transport? *Any transloading where loads are split, combined, treated, sorted, containerized, packed/repacked, opened, enclosed, labeled/re-labeled, 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

32. Who arranges product transportation?

33. How do you ensure that transport units are cleaned prior to loading organic products?

34. Is this inspection/cleaning process documented (Ex: Clean Truck Affidavit)?

Yes **No**

35. Are transport units used to carry any prohibited substances?

Yes **No**

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

Yes **No**

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

Yes **No**

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

dedicated organic-only **organic product shrink-wrapped**

pallets **separate area in transport unit**

pallet tags **other**

39. If "other," explain:

40. **STORAGE INFORMATION:** Provide information for storage areas. Off-site storage facilities must be certified organic or eligible as 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. Contact MOSA to determine if storage qualifies for exemption. The **Exempt (formerly Excluded) Handler** form must be completed for such facilities. Storage areas must be indicated on facility **map(s)**.

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.*

Non-Processing Storage Areas

Use/Product Stored	Location	Offsite Location Contact/Address	Certified Under	For organic use only?	How is contamination prevented in this area?

Additional Comments:

41. **WASTE MANAGEMENT PLAN:** Waste products sold as organic must be certified. Will any waste products be sold as certified organic?

- Yes No

42. If "yes," please describe the waste product.

43. 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 | |

44. If "other," explain:

45. What records do you maintain on your waste volume?

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

Describe procedures and documentation ensuring personnel have appropriate training on your Organic System Plan.

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 operation that is responsible for handling or transporting organic ingredients or product, and a program of regular preventive monitoring must be a part of this plan to show that a previously allowed material is still needed.

47. What type(s) of pest management is used at this facility?

- in-house
 contract pest control service
 none

48. If "in-house," give name of responsible person.

49. If "contract pest control service," give name, address, and phone number.

50. Are pesticides used?

If "Yes," Submit a Handler Input Inventory form listing all pest control substances including baits, sprays, pesticides, or fumigants in use, product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA, and a pest management facility map.

- Yes
 No
 Not applicable, I do not take possession of the product.

51. Indicate the type of pesticide management records maintained, including pesticide applications.

52. **GENERAL SANITATION:** Good sanitation practices must be used throughout the facility. Residues from cleaning materials must not contaminate organic products.

Are Sanitation materials used?

If "Yes," Submit a Handler Input Inventory form listing all cleansers and sanitizers used in the facility, and product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA

- Yes**
 No
 Not applicable, I do not take possession of the product

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 sold/distributed products must balance with certified organic products received (loss to spoilage or inadequate supply chain documentation 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.

53. What documents do you use to track organic products? *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"/> receipts |
| <input type="checkbox"/> bills of lading | <input type="checkbox"/> quality assurance reports |
| <input type="checkbox"/> certificates of analysis | <input type="checkbox"/> scale tickets |
| <input type="checkbox"/> receiving records | <input type="checkbox"/> equipment cleaning logs |
| <input type="checkbox"/> customs forms | <input type="checkbox"/> shipping logs |
| <input type="checkbox"/> organic import certificates | <input type="checkbox"/> sales receipts |
| <input type="checkbox"/> phytosanitary forms | <input type="checkbox"/> input labels/composition list |
| <input type="checkbox"/> transaction certificates | <input type="checkbox"/> labor records |
| <input type="checkbox"/> inspection forms | <input type="checkbox"/> pest control log |
| <input type="checkbox"/> receiving summary log | <input type="checkbox"/> residue tests |
| <input type="checkbox"/> invoices | <input type="checkbox"/> clean transport |
| <input type="checkbox"/> organic certificates | <input type="checkbox"/> receiving manifests |
| | <input type="checkbox"/> other |

54. If "other," explain:

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

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

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

- Yes** **No**

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

- Yes** **No**

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

60. 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**
- electronic**
- 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.

61. **LABELING:** For label brand holders or label owners, all labels you are responsible for that make 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. (Note: if you plan to apply labels at your operation, you must fill out the Handler OSP.)

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

- Yes**
- No**

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

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

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

- Yes**
- No**

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

- Website**
- Brochures**
- Signs**
- Advertising materials**
- Other**
- None**

66. If "other," explain:

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

- Yes**
- No**