

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 include field numbers, acreages, and biodiversity features; buffers and adjoining land use must be clearly labeled. Have maps for all fields under your management including conventional or transitional fields, both rented and owned. A separate map showing all facilities for crop/feed storage and livestock areas (both indoors and outdoors) is preferred, but facilities may also be included on the field maps if they can be clearly understood.

Field Histories/Prior Land Use Declarations

Three years of field history information, including seeds and inputs used, is required for all land requested for certification, including pastures, in-ground greenhouse production areas, maple woods, and wild-cropped areas. If you are a new applicant and have managed the land for the past three years, you need to complete a 3 Year Field History form to document your management. If you are requesting certification for land that has not been under your management for three years, a Prior Land Use Declaration form must be completed by the previous manager(s) to document their management.

Field Activity Log

Field activity logs will vary depending on the type of operation you are managing. Records 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, storage and/or use of crops, and general observations on crops. Calendars, daily planners, notebooks or computers are acceptable – use whatever works best for you and can be easily audited by your inspector.

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 if 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 - Producer form or have the catalogs you consulted (at least three companies that carry organic seed or planting

stock) along with your reasons for purchasing nonorganic seed 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.

Crop Inputs

A crop input is anything other than seeds, on-farm manure, or on-farm compost that is applied to land or crops as fertilizer, inoculant, potting mix, foliar application, 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. Be sure to list the exact brand name and manufacturer's name for each input listed. If a product has not been approved by MOSA, ingredient information needs to be submitted for review prior to use. For fertilizers, we need a complete list of ingredients, not an analysis. Have all purchase records for inputs available at inspection. Keep a copy of your Crop Input Inventory form for your records, updating it as necessary.

Cleaning Documentation

If any equipment or storage areas are used for both organic and nonorganic crops, you need to keep complete cleaning records. Records should include the date, the cleaning method used, and the name of the individual who performed the purge or cleaning prior to 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 organic crops or feed your organic crops to livestock and also have conventional or transitional crops on the farm, a system for preventing commingling and contamination must be in place. All bins, cribs, bunkers and other storage areas must be clearly identified with an identification (ID) number, letter, or name, listed in the Farm Organic System Plan, and identified on farm maps. Storage areas used for both organic and nonorganic crops must be cleaned prior to organic use. If many different crops are being stored in bins over the course of a season, the storage records should identify the field(s) 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 still 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 storage 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 for lot number 21-JD-5-C-1114-2:

Year of Production	Producer Initials	Storage Bin or Field #	Crop	Shipped Date	Load #
2021	JD	5	<u>C</u> orn	Nov 14	2

Sales Records

Sales records are verified annually during your inspection. Sales records should include the following for both organic and nonorganic product sold: type of product sold, quantity sold, organic status, sales date, sales amount, clean transport verification, and other documentation as applicable. The Audit Control form may be helpful in keeping these records.

Additional Recordkeeping Requirements for Livestock/Livestock Products

Your livestock recordkeeping system must enable animal lineage to be tracked from birth to slaughter, including purchase information, mortality, shipping, and sales. Records must also encompass all aspects of your management system including health management, feeds and supplements, outdoor access, and temporary confinement. Records must be retained for five (5) years, even for animals that have died or were sold.

Animal Identification

We require a list of the livestock (except poultry) requested for certification with your initial application and that list is updated annually thereafter at inspection. The list must include the animal identification (ID; name and/or number), date of birth, organic slaughter eligibility, and pertinent information such as purchase source.

Health Records

Large animals must be individually identified and have individualized records of lineage and treatment. Herd health records should include animal ID (number, photo or name), lineage information, health treatments, reproductive information, general comments, and ship or cull dates. Individual health records must be established for each dairy animal that receives treatment. 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.

Poultry, rabbits, and other small animals are to be tracked by flock, litter, lots, or other applicable units when all individuals receive the same inputs and treatment. General flock, litter, or group health records must be maintained for these animals.

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 numbers, your vaccination schedule, treatments, mortality, production records, confinement records, and dates of provision for outdoor access. Poultry operations should also maintain records of how much synthetic methionine is in the feed ration, and operations purchasing pullets need to be able to show how much methionine was fed while the flock was at the pullet raising operation.

Feed Rations

Record your overall rations and feed supplements and note when ration changes are made. Receipts and proof of certification must be kept for all purchased feed. For ruminants, use the

Livestock Winter & Summer Rations form to document seasonal rations and calculate pasture intake.

Livestock Purchases

Keep records of any livestock purchases 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

Livestock inputs include feed supplements, minerals, additives or inoculants, pest treatments, wound treatments, health treatments or preventatives, bedding materials, and cleaning products. You need to provide MOSA with a Livestock Input Inventory form listing all products used. Be sure to list the exact brand name and manufacturer's name for each input listed, as well as your intended use. If a product has not been approved by MOSA, ingredient information needs to be submitted for review prior to use. Have all purchase records for inputs available at inspection. Keep a copy of your Livestock Input Inventory form for your records, updating it as necessary.

Livestock Sales

Keep complete sales records for organic livestock and livestock products and have them available for inspection. Sales records should identify the organic slaughter eligibility status of the animals as applicable. If you sell both organically and conventionally, keep complete records for both types of production. If you must treat an animal with a prohibited substance, contact MOSA immediately to report the treatment and keep records of the livestock sale.