# Retail Organic System Plan

Complete all sections of this plan if you are seeking certification as an organic retail handler. Use this form to describe your operation. If a question does not apply, indicate "none" or "N/A" if not applicable.

Attach a current schematic retail flow chart or written description of how products move through the store, store map, pest management map, and appropriate supporting documentation as noted within the form.

## GENERAL INFORMATION

1. What type of retail store are you requesting certification for?
   - [ ] Independent supermarket
   - [ ] Natural products supermarket
   - [ ] Natural products cooperative
   - [ ] Independent single health/natural products store
   - [ ] Other

2. If "other," explain.

3. List government permits/licenses/inspections in effect for your operation.

4. CERTIFICATION REQUEST OVERVIEW:
   Please estimate the percentage of the products sold in your store which make an organic claim.

5. What is the square footage of your store?

List retail store departments and indicate which departments you are requesting certification. Include department additions or changes you anticipate making in the table below.

Please verify the lines below. Use the table to add new items. If there isn't enough room, attach a separate list with the same column layout.

<table>
<thead>
<tr>
<th>Retail Departments</th>
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<tr>
<td>Department</td>
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Additional comments, including anticipated department changes.

7. What is the total square footage of departments for which certification is requested? This should include total square footage of all certified departments and parts of the store related to those areas, such as storage/back stock and checkout areas.
8. Submit a schematic product flow chart or written description showing how and where products are received, stored, prepared, packaged, and warehoused, and identify all pieces of equipment, and storage.

9. Submit a facility map showing location of all departments and storage areas. Please note if off-site facilities are in use. Off-site facilities, including some storage facilities, may need to be separately inspected and/or certified. An Excluded Handler form may be submitted for off-site facilities that handle packaged or otherwise enclosed organic products. Contact MOSA for details.

10. Are multi-ingredient products processed on-site and represented as organic? Submit an Organic Product Profile for each product.
   Yes  No

11. ORGANIC CONTROL POINTS: OCP’s, similar to Hazard Analysis Critical Control Points (HACCP), are points in the handling system where the integrity of the organic product may be compromised. Factors to consider include physical proximity, inadequate storage, equipment labeling, and employee training. Examples of compromised integrity include commingling with nonorganic products, contamination by sanitizers or pesticides, and improper cleaning of equipment prior to running organic products.

Do you have an Organic Control Point program in place to address areas of potential contamination?
   Yes  No

If "yes," the remaining sections of this form should help you describe Organic Control Points you have identified in each department for which certification is requested. Also submit a copy of any separately documented Organic Control Point Program.

If "no," do you have plans to implement an Organic Control Point program?
   Yes  No

Question(s) not listed are for office use only.

EMPLOYEE TRAINING NOS §§205.201, 272
MOSA requires that organic handlers, supervisors and employees should receive appropriate training in proper organic handling techniques. Submit copies of training program protocols and forms used.

15. Do you have an organic training program?
   Yes  No

16. If "no," describe how you prevent commingling and contamination with organic products.

17. Is your training program written down (e.g. employee manual)? If no, describe how training consistency and completeness is ensured.

18. How is individual employee training documented/verified?
   □training log  □personnel files  □resumes  □other

19. If "other," explain.

20. Does your training program include training on the proper handling of organic products?
   Yes  No

21. How often must training be updated/refresher?

22. Which departments that are requested for certification have individualized training?

23. Do your employees understand the National Organic Standards, and regulations for labeling products as organic?
   Yes  No

24. Do your employees understand basic certified organic production methods?
   Yes  No

25. Are employees empowered to re-label organic food as nonorganic in the event that commingling or contamination has occurred?
   Yes  No

26. Do affidavits or other documents verify that individual employees understand the responsibilities in maintaining organic product integrity?
   Yes  No

27. How is employee training and skill monitored?
   □observation/supervision  □periodic evaluations  □training log  □testing  □other

28. If "other," explain.

Question(s) not listed are for office use only.
WATER USE AND SANITATION NOS §205.105, .201, .272
Water coming in contact with organic products must meet drinking water standards as established by the Safe Water Drinking Act. MOSA requires an initial Coliform bacteria and nitrate water test and may require subsequent tests. Water contacting conventionally produced raw agricultural products must not contact raw or finished organic products.

31. How is water used in the retail store? Check all that apply.
☐ no water usage ☐ misting organic product in display areas ☐ cooling organic product in display areas
☐ cooling organic product in preparation ☐ cooling organic product in storage ☐ ingredient in prepared foods ☐ cooking organic foods
☐ washing organic product ☐ cleaning equipment ☐ cleaning facility ☐ other

32. If "other," explain.

33. What are your sources of water (e.g. municipal, on-site well)? Submit a water test for Coliform bacteria and nitrates for nonmunicipal water sources.

34. List any known water contaminants.

35. What on-site water treatments are used (e.g. additives, softening, distillation, reverse osmosis)?

36. If filters are used, how often are they replaced or cleaned?

37. If chlorine materials are added as a water treatment for water used in food preparation and/or contacting organic food, what is the residual chlorine level in the water?

GENERAL SANITATION: Certified organic handlers must comply with all applicable Federal and State regulations, as well as additional requirements for protection of organic integrity. Good sanitation practices must be used throughout the facility and residues from cleaning materials must not contaminate organic products. List all cleansers/sanitizers on the Handler Input Inventory form. Provide product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA.

Describe cleaning methods used throughout facility in the table below.

Please verify the lines below. Use the table to add new items. If there isn't enough room, attach a separate list with the same column layout.

<table>
<thead>
<tr>
<th>Sanitation Program</th>
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<tbody>
<tr>
<td>Cleaning method</td>
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Additional Comments

39. Describe general facility sanitation methods used prior to organic production (or submit SSOPs if applicable).
40. Are any cleansers/sanitizers listed as restricted or prohibited by the National List?  
   ☐ Yes   ☐ No

41. What measures are in place to ensure that the residues of cleaners/sanitizers and/or nonorganic food matter do not remain on processing equipment and/or containers when organic processing occurs?  
   ☐ pH testing of rinseate  ☐ residue testing on food contact surfaces  ☐ use sanitizer with ingredient on the National List  ☐ purge/flush  
   ☐ mechanical cleaning  ☐ other

42. If "other," explain.

43. How, and how often, is general sanitation monitored?  
   ☐ SOP  ☐ cleaning log  ☐ supervision  ☐ other  ☐ daily  ☐ weekly

44. If "other," explain.

45. Where are cleaning/sanitizing materials stored?

46. If both organic and nonorganic materials are handled using the same equipment (e.g., in preparation of foods, raw food display), describe procedures followed in switching from handling nonorganic to organic products.

Question(s) not listed are for office use only.

PEST MANAGEMENT NOS §§205.105, .201, .271, .272

The NOS 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 consistent with allowed materials 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.

49. GENERAL INFORMATION:
   How is pest control handled?
   ☐ in-house  ☐ outside contractor  ☐ both

50. Provide the name of your in-house pest control officer or contract pest control service. If a contract pest control service is used provide their contact information including address and phone number.

51. What pest problems do you generally have? Check all that apply.  
   ☐ flying insects  ☐ crawling insects  ☐ spiders  ☐ birds  ☐ rats  ☐ mice  ☐ other

52. If "other," explain.

53. PEST MANAGEMENT PRACTICES:
   Check all pest management practices used. Submit facility map(s) showing locations of traps and monitors.  
   ☐ good sanitation  ☐ removal of exterior habitat/food sources  ☐ cleanup of spilled product  ☐ sealed doors and/or windows  ☐ exclusion  
   ☐ repair of holes, cracks, etc.  ☐ screened windows, vents, etc.  ☐ sheet metal on sides of building exterior  ☐ physical barriers  ☐ mowing  
   ☐ air curtains  ☐ air showers  ☐ positive air pressure in facility  ☐ ingredient inspection for pests  ☐ monitoring  
   ☐ inspection zones around interior perimeter  ☐ ultrasound/light devices  ☐ release of beneficials  ☐ sticky traps  ☐ electrocutors  
   ☐ pheromone traps  ☐ mechanical traps  ☐ scare eye balloons  ☐ freezing treatments  ☐ heat treatments  ☐ vacuum treatments  
   ☐ carbon dioxide  ☐ nitrogen  ☐ vitamin baits  ☐ pyrethrum  ☐ rotenone  ☐ boric acid  ☐ disodium octahydrate  
   ☐ diatomaceous earth  ☐ precipitated silica  ☐ fumigation  ☐ fogging  ☐ crack and crevice spray  ☐ other

54. If "other," explain.

55. Are your pest prevention methods and structural pest management system effective? If not, explain why.

56. Are records kept of your monitoring activities?  
   ☐ Yes   ☐ No

57. How often do you inspect your pest prevention system (daily, weekly, monthly, etc.)?

58. What changes do you anticipate to your pest management system?
59. Are any products used which are prohibited by the National List?

☐ Yes  ☐ No

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

☐ Yes  ☐ No

61. Indicate what type of pesticide application records are maintained.

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

63. Describe measures to reduce or prevent pest control product use in the future.

64. Where are pest control substances stored? Submit a facility map showing locations of traps and monitors. List pest control products on the Handler Input Inventory form. Provide product label and ingredient information for inputs not OMRI listed or previously approved by MOSA.

65. WASTE MANAGEMENT:
   How do you manage waste at your facility? Check all that apply.
   ☐ on-site dumpster  ☐ material recycling  ☐ water recycling  ☐ water filtering  ☐ composting  ☐ daily pickup of waste  ☐ other.

66. If "other," explain.

Question(s) not listed are for office use only.

PRODUCE DEPARTMENT  NOS §§205.201, .272, .301 - .311

69. Do you carry organic produce in the store? If "no," skip to the Bulk Foods, Herbs and Spices Department Section.

☐ Yes  ☐ No

70. Provide the name of the Department Manager or employee in charge of the Produce Department.

71. ORGANIC PRODUCE SOURCES/RECEIVING:
   How is the source and certification status of organic produce verified?

72. Is received produce compared to an invoice to check accuracy of shipment?

☐ Yes  ☐ No

73. If produce is not properly labeled, how is this corrected?

74. What type of quarantine protocol occurs if product is improperly labeled, damaged or infested?

75. Is produce inspected and are fumigant slips, pads, sulfite slips, and/or other types of liners removed?

☐ Yes  ☐ No

76. If "no," explain.

77. STORAGE:
   List all types of storage used for produce (e.g. walk-in cooler, dry storage areas) including the square footage and temperature of each area.

78. How are organic and nonorganic storage areas separated (e.g. signs, dedicated areas, dividers)?

79. How is organic produce labeled in storage areas?

80. Are fumigant slips, pads, sulfite slips, and/or other types of liners used in produce storage? If yes, list liner and produce type(s). List all inputs on the Handler Input Inventory.

81. How do you protect the integrity of organic produce that is stored and displayed in proximity to nonorganic products, prohibited materials, and/or other potential contaminants?
82. FRESH PRODUCE PREPARATION AREAS:
Do you maintain separate areas and equipment for organic and nonorganic produce preparation?
- Yes  - No

83. If "no," how do you ensure that organic integrity is maintained?
- cleaning of equipment and food preparation surfaces
- prep all organic produce first, prior to prepping nonorganic produce
- maintain sanitation schedules  - cleaning logs  - other

84. If "other," explain.

85. When organic produce is washed, is the water fresh and clean, and is the sink area clean prior to use? If no, please explain.

86. If packaging materials are not clean and free of dyes and chemicals, explain.

87. If packaging materials are recycled for re-use between organic and nonorganic produce, how is organic integrity protected?

88. FRESH PRODUCE DISPLAY AREAS:
How is continued accuracy of produce labels and/or marketplace information monitored?

89. Are organic and nonorganic produce displayed in distinctly separate areas?
- Yes  - No

90. Is any unwrapped organic produce displayed next to nonorganic produce?
- Yes  - No

91. Are specific shelf liners, containers, baskets and other display items dedicated for organic use?
- Yes  - No

92. Are shelf liners washed between use on nonorganic and organic display areas?
- Yes  - No

93. Are individual organic produce items labeled "organic"?
- Yes  - No

94. In wet display areas, how do you ensure nonorganic produce does not touch or drip on organic produce?

95. How can the customer easily distinguish between organic and nonorganic produce?

96. How is produce commingling by customers prevented?

97. Describe any other identified Organic Control Points, or changes made (or planned) to protect organic integrity in the Produce Department.

Question(s) not listed are for office use only.

BULK FOODS, HERBS, AND SPICES DEPARTMENT NOS §§205.201, .272, .301 - .311

100. Do you have a bulk foods, herbs, and/or spices department in the store? If "no," skip to the Meat Department Section.
- Yes  - No

101. Provide the name of the Department Manager or employee in charge of the Bulk Foods, Herbs and Spices Department.

102. ORGANIC PRODUCT SOURCES/RECEIVING:
How is the source and certification status of organic bulk food, herbs and spices verified?

103. Is received product compared to an invoice to check accuracy of shipment?
- Yes  - No

104. If product is not properly labeled, how is this corrected?

105. What type of quarantine protocol occurs if product is improperly labeled, damaged or infested?
106. **STORAGE:**
List all types of storage used (e.g. walk-in cooler, dry storage areas) including the square footage and temperature of each area.

107. How are organic and nonorganic storage areas separated (e.g. signs, dedicated areas, dividers)?

108. How is organic product labeled in storage areas?

109. When organic product is partially used and returned to storage, how is the unused portion sealed and labeled?

### BULK FOODS, HERBS AND SPICES PREPARATION AREAS:
Do you maintain separate areas and equipment for organic and nonorganic bulk food re-packing?

- [ ] Yes
- [ ] No

111. If "no," how do you ensure that organic integrity is maintained?
- [ ] cleaning of equipment and food preparation surfaces
- [ ] re-pack all organic products first, prior to re-packing nonorganic product
- [ ] maintain sanitation schedules
- [ ] cleaning logs
- [ ] use only food-grade gloves
- [ ] other

112. If "other," explain.

113. If packaging materials are not food grade, clean and free of dyes and chemicals, explain.

114. If packaging materials are recycled for re-use between organic and nonorganic products, how is organic integrity protected?

### BULK FOODS, HERBS AND SPICES DISPLAY AREAS:
How can product in bulk containers be tracked back to the source (e.g. documentation, lot numbers, code)?

116. How is continued accuracy of product labels and/or marketplace information monitored?

117. Do all organic bulk food bin labels meet the NOS requirements for organic claim statements ("100% organic", "organic", "made with organic...")?
- [ ] Yes
- [ ] No

118. Are all organic ingredients listed on the label’s ingredient section?
- [ ] Yes
- [ ] No

119. How are bulk bins used for organic products cleaned prior to use?

120. Are organic and nonorganic bulk bins displayed in distinctly separate areas?
- [ ] Yes
- [ ] No

121. How can the customer easily distinguish between organic and nonorganic products?

122. What means prevent customers from spilling nonorganic bulk food into or on the cover of an organic bulk food item?

123. How is product commingling by customers prevented?

124. Describe any other identified Organic Control Points, or changes made (or planned) to protect organic integrity in the Bulk Foods, Herbs and Spices Department.

**Question(s) not listed are for office use only.**

### MEAT DEPARTMENT NOS §§205.201, .272, .301 -. .311

127. Do you have a meat department in the store? If "no," skip to the Prepared Foods Department Section.
- [ ] Yes
- [ ] No

128. Provide the name of the Department Manager or employee in charge of the Meat Department.

129. Do you have a HAACP or other quality control program in place?
- [ ] Yes
- [ ] No
130. Do you have any off-site processing or storage of organic meat products? If yes, please contact the MOSA office and provide details on the facility. Additional forms and fees may apply.
☐ Yes ☐ No

131. What type of meat products are sold? Check all that apply.
☐ beef ☐ chicken ☐ turkey ☐ lamb ☐ pork ☐ bison ☐ other

132. If "other," explain.

133. How are meat products sold?
☐ prepackaged fresh or frozen in self-serve display case ☐ ground organic meat products in self-serve display case ☐ fresh organic meat cuts behind glass ☐ ground organic meat products behind glass ☐ other

134. If "other," explain.

135. Are any organic meat products further processed or ground on the premises? If yes, describe applicable products and processing.

136. ORGANIC PRODUCT SOURCES/RECEIVING:
How is the source and certification status of organic meat verified?

137. Are received products compared to an invoice to check accuracy of shipment?
☐ Yes ☐ No

138. If product is not properly labeled, how is this corrected?

139. What type of quarantine protocol occurs if product is improperly labeled or damaged?

140. STORAGE:
List all type(s) of meat storage used (e.g. walk-in cooler, walk-in freezer) including the square footage and temperature of each area.

141. How are organic and nonorganic storage areas separated (e.g. signs, dedicated areas, dividers)?

142. How is organic product labeled in storage areas?

143. MEAT PREPARATION AREAS:
Do you maintain separate areas, tubs and equipment for organic and nonorganic meat preparation?
☐ Yes ☐ No

144. If "no," how do you ensure that organic integrity is maintained?
☐ cleaning of equipment and food preparation surfaces ☐ prop all organic product first, prior to prepping non-organic product ☐ maintain sanitation schedules ☐ cleaning logs ☐ other

145. If "other," explain.

146. If packaging materials are not food grade, clean and free of dyes and chemicals, please explain.

147. MEAT DISPLAY AREAS:
How is continued accuracy of meat labels and/or marketplace information monitored?

148. Do labels show "certified organic" for organic meat products?
☐ Yes ☐ No

149. Are organic and nonorganic meat products displayed in distinctly separate areas?
☐ Yes ☐ No

150. Is any organic meat stored next to nonorganic meat? If yes, how is organic integrity protected with respect to touching, dripping, and/or commingling?

151. Are specific case trays, containers and other display items dedicated for organic use?
☐ Yes ☐ No

152. Are trays washed between use for nonorganic and organic meat products?
☐ Yes ☐ No
153. How can the customer easily distinguish between organic and nonorganic meat products?

154. How is product commingling by customers prevented?

155. Describe any other identified Organic Control Points, or changes made (or planned) to protect organic integrity in the Meat Department.

*Question(s) not listed are for office use only.*

**PREPARED FOODS DEPARTMENT** NOS §§205.105, .201, .272, .301 -.311

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. Submit Organic Product Profiles for each multi-ingredient product processed on-site and represented as organic.

158. Do you have a Prepared Foods Department in the store? If “no,” skip to the Prepackaged Grocery Foods Department Section.

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<th>Yes</th>
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159. Provide the name of the Department Manager or employee in charge of the Prepared Foods Department.

160. **ORGANIC PRODUCT SOURCES/RECEIVING:**

How is the source and certification status of organic ingredients verified?

161. Is received product compared to an invoice to check accuracy of shipment?

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162. If product is not properly labeled, how is this corrected?

163. What type of quarantine protocol occurs if product is improperly labeled, damaged or infested?

164. If organic products are taken from other store departments, how is this product transfer documented?

165. **STORAGE:**

List all types of storage used (e.g. walk-in coolers, dry storage areas) including the square footage and temperature of each area.

166. How are organic and nonorganic storage areas separated (e.g. signs, dedicated areas, dividers)?

167. How is organic product (ingredients and finished) labeled in storage areas?

168. Are prepared organic food products stored in distinctly separate areas from prepared nonorganic food products?

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169. **PREPARATION AREAS:**

Do you maintain separate areas and equipment for organic and nonorganic food product preparation?

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170. If no, how do you ensure that organic integrity is maintained?

- [ ] cleaning of equipment and food preparation surfaces
- [ ] prepare all organic product first, prior to preparing nonorganic product
- [ ] maintain sanitation schedules
- [ ] cleaning logs
- [ ] other

171. If "other," explain.
172. When organic produce is washed, is the water fresh and clean, and is the sink area clean prior to use? If not, please explain.

173. On the prep table and shelves, are nonorganic ingredients clearly separated from the organic ingredients?
   - Yes
   - No

174. If packaging materials are not food grade, clean and free of dyes and chemicals, explain.

175. If packaging materials are recycled for re-use between organic and nonorganic products, how is organic integrity protected?

176. **NONORGANIC INGREDIENT VERIFICATION:** Nonorganic ingredients and processing aids used must be allowed on the National List. All annotations and restrictions for ingredients used from the National List must be followed, and commercial unavailability documented when applicable.

   Are all ingredients non-GMO, produced without the use of sewage sludge, and non-irradiated? If not, please explain.

177. If yes, do you have verification?
   - Yes
   - No

178. Do processing aids meet the NOS requirements (see NOS §205.301(f))? If not, please explain.

179. How do you ensure that the same ingredients in both organic and nonorganic form are not used in the same product?

180. **PREPARED FOODS DISPLAY AREAS:**

   How is continued accuracy of product labels and/or marketplace information monitored?

181. Do all prepared foods labels meet the NOS requirements for organic claim statements ("100% organic", "organic", "made with organic...")?
   - Yes
   - No

182. Are all organic ingredients listed on the label's ingredient section? Submit Organic Product Profiles for all food items prepared in the store.
   - Yes
   - No

183. Are any organic products that are not individually wrapped displayed next to nonorganic products?
   - Yes
   - No

184. Are shelf liners, bowls, serving containers, baskets and other display items cleaned prior to organic use?
   - Yes
   - No

185. Are dividers used between organic and nonorganic display areas?
   - Yes
   - No

186. Are individual organic product items labeled "organic"?
   - Yes
   - No

187. How can the customer easily distinguish between organic and nonorganic products?

188. How is product commingling by customers prevented?

189. Describe any other identified Organic Control Points, or changes made (or planned) to protect organic integrity in the Prepared Foods Department.

**Question(s) not listed are for office use only.**

**PREPACKAGED GROCERY FOODS DEPARTMENT NOS §205.272**

192. Do you have a prepackaged grocery foods department in the store? *If "no," skip to the Audit and Inventory Control System Section.*
   - Yes
   - No

193. Provide the name of the Department Manager or employee in charge of the Prepackaged Grocery Foods Department.

194. **ORGANIC PRODUCT SOURCES/RECEIVING:**

   Is received product compared to an invoice to check accuracy of shipment?
   - Yes
   - No

195. For new products, are brand name ID, name of certifying agent and seal use checked?
   - Yes
   - No

196. If product is not properly labeled, how is this corrected?
197. What type of quarantine protocol occurs if product is improperly labeled, damaged or infested?

198. **STORAGE:**
List all types of storage used (e.g. walk-in cooler, walk-in freezer, dry storage areas) including the square footage and temperature of each area.

199. How are organic and nonorganic storage areas separated (e.g. signs, dedicated areas, dividers)?

200. How is organic product (ingredients and finished) labeled in storage areas?

201. Are prepackaged organic food products stored in distinctly separate areas from prepackaged nonorganic food products?

202. **GROCERY DISPLAY AREAS:**
How is continued accuracy of product labels and/or marketplace information monitored?

203. How can the customer easily distinguish between organic and nonorganic products?

204. Describe any other identified Organic Control Points, or changes made (or planned) to protect product organic integrity in the Prepackaged Grocery Foods Department.

*Question(s) not listed are for office use only.*

**AUDIT 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 supplier(s) through the entire handling system, including packaging and storage, and on through distribution, sales and transport using a product tracking system such as lot numbers, date codes, or similar. Organic handlers must retain valid proof of certification for all organic ingredients.

207. Provide an audit trail **flow chart** or written description for each department showing how all documents in your record system work together to enable traceability. Identify all records used, by name or by record type, for tracking products at receiving, in-process, in storage, and in shipping.

208. Can your documentation system track all organic products from receiving through sales?

| ☐ Yes | ☐ No |

209. For products that are processed on-site and represented as organic, can your recordkeeping system balance organic ingredients in with finished organic product out?

| ☐ Yes | ☐ No |

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

| ☐ Yes | ☐ No |

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

212. Describe your product recall system:

213. What other records do you maintain?

<table>
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<tr>
<th>☐ ingredient verifications</th>
<th>☐ material safety data sheets</th>
<th>☐ equipment cleaning records</th>
<th>☐ labor records</th>
<th>☐ pest control log</th>
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<tbody>
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<td>☐ documentation showing lack of commercial availability</td>
<td>☐ residue tests</td>
<td>☐ other</td>
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</tbody>
</table>

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

215. 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?

How do you intend to maintain these records?

| ☐ hard copy | ☐ electronically | ☐ both |

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

| ☐ Yes | ☐ No |

*Question(s) not listed are for office use only.*