|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Operator #:** |  | **Operation Name:** | |  | | | | **Date:** |  | |
|  |  |  | |  | | | |  |  | |
| **A. Product Flow** | | | | | | | | | | |
| 1. Attach a complete written description or schematic product flow chart that shows the movement of all organic products, from incoming/receiving through any labeling/packaging processes to outgoing/shipping. All equipment and storage areas must be identified. In the case of a handler facilitating the movement of product, the flowchart must show the movement of the products from their initial source, through any storage facilities, on to their destination (flowchart can be general and does not need to indicate specific sources and destination).  Attached | | | | | | | | | | |
| **B. Organic Control Points** | | | | | | | | | | |
| Similar to Hazard Analysis Critical Control Points (HACCP), Organic Control Points (OCP) are points in a handling system where the integrity of the organic product may be compromised. Examples are improper handling of bulk organic product, resulting in commingling with non-organic product, or use of a prohibited pesticide when organic product is present, resulting in contamination by a prohibited substance. OCPs should be noted on the product-movement flow chart. | | | | | | | | | | |
| 1. Do you have an Organic Control Point program in place to address areas of potential commingling and/or contamination?  YES  NO  If **NO**, do you have plans to implement an Organic Control Point program?  YES  NO | | | | | | | | | | |
| 2. If you have employees, are they trained on organic regulations (including organic handling requirements for transport and storage and organic status verification) and is this training documented?  YES  NO  If **YES**, please explain how they are trained and the documentation that is maintained for the training. | | | | | | | | | | |
| **C. Co-Packers** | | | | | | | Not Applicable; co-packers not used | | | |
| 1. Does your operation use co-packers to produce any products?  YES  NO  If **YES**, provide the following information and provide a copy of the co-packers organic certificate.  A separate list may be submitted as long as all information in the table is listed.  List Attached | | | | | | | | | | |
| **Name of Co-Packer** | | | **Certification Agency** | | **Products co-packed** | | | | | |
|  | | |  | |  | | | | | |
|  | | |  | |  | | | | | |
|  | | |  | |  | | | | | |
|  | | |  | |  | | | | | |
| 2. Please describe the business arrangement with the co-packer(s), including which entity owns the recipes/formulations for the products co-packed, which entity creates the labeling, and which entity buys the ingredients for the products? | | | | | | | | | | |
| **D. Off-site Storage** | | | | | | Not Applicable; product shipped directly to buyer | | | | |
| 1. Please list all off-site storage facilities in the table below. | | | | | | | | | | |
| **Off-site Storage Facility**  **(Name and address)** | | | | | | | | | | **Is facility certified organic?** |
|  | | | | | | | | | | YES  NO |
|  | | | | | | | | | | YES  NO |
|  | | | | | | | | | | YES  NO |
|  | | | | | | | | | | YES  NO |
|  | | | | | | | | | | YES  NO |
| 2. If off-site storage facilities are not certified organic, are off-site storage affidavits in place?  YES  NO  Not Applicable | | | | | | | | | | |
| 3. Please describe how products are transported from grower to off-site facility, then from off-site facility to buyer. | | | | | | | | | | |
| 4. What documentation is maintained to ensure clean transport in those legs of the journey? | | | | | | | | | | |
| 5. **NOP** - Please explain how label compliance under 205.307 will be maintained. Please include a summary of any SOPs that have been developed, employee training, how the operation will label the shipping containers or ensure the transport/shipping companies are informed of these requirements, what documentation will be maintained with the audit trail to show each shipment was labeled correctly (e.g. if the operation does not complete the labeling, photos of the container for each shipment):  *§205.307: (a) Nonretail containers used to ship or store certified organic agricultural products must display: (1) Identification of the product as organic; and (2) The production lot number, shipping identification, or other unique information that links the container to audit trail documentation. (b) Audit trail documentation for nonretail containers must identify the last certified operation that handled the agricultural product.*    ***SOPs and other documentation must be available at inspection.*** | | | | | | | | | | |
| 6. Are any reconditioning or repacking services used while product is at a warehouse?  YES  NO  If **YES**, please provide the name of the company who provides the services:  Also attach a copy of their organic certificate and a copy of the contract with the company.  Attached | | | | | | | | | | |
| **E. Recordkeeping** | | | | | | | | | | |
| Organic standards require that records disclose all activities and transactions of the operation, be maintained for 5 years, demonstrate compliance with the programs for which certification is being sought, and be available for review. Organic products must be tracked through the facility/final destination and back to the original source. The actual amounts of organic products must balance with the amounts that have been handled. All relevant documents must identify products as “organic” and specify the certification program. | | | | | | | | | | |
| 1. Please explain how your audit trail system allows you to trace the movement of organic products from the source and on to its final destination. | | | | | | | | | | |
| 2. How long do you keep your records? | | | | | | | | | | |
| 3. Do you maintain a complaint log?  YES  NO | | | | | | | | | | |
| 4. Which of the following records do you maintain for organic handling?  purchase orders  contracts  invoices  receipts  bills of lading  customs forms  scale tickets  quality test results  Certificates of Analysis  receiving records  copies of organic certificates  receiving summary log (12 mo.)  inventory records  shipping log  transport unit inspection/cleaning forms  sales orders  sales invoices  phytosanitary certificates  export declaration forms  shipping summary log  Transaction Certificates  sales summary log  audit control register  NOP Import Certificates  other (specify): | | | | | | | | | | |
| 5. Do you ensure that all invoices, BOLs and other sales documents indicate a lot number, a reference to the organic status of the product, and for EU/Swiss/UK shipments-only: the name of the certifier?  YES  NO | | | | | | | | | | |
| 6. What records do you maintain to ensure the organic status of products you broker? | | | | | | | | | | |
| 7. Are any abbreviations (e.g. ORG) or acronyms used to identify products (either in your system or on labels or containers) as organic?  YES  NO  If **YES**, please explain: | | | | | | | | | | |
| 8. Organic operators are required to ensure that their day-to-day policies and procedures directly reflect the policies and procedures stated in their Organic System Plan. Please describe how you ensure your operation has implemented the Organic System Plan and is following the policies and procedures laid out in your Plan and provide information on how often you perform monitoring of your day-to-day operations to ensure they adequately reflect the management practices noted in your Plan. | | | | | | | | | | |
| **F. Organic Fraud Prevention Plans** | | | | | | | | | | |
| 1. Do you have a written organic fraud prevention plan in place? *Please note this is a requirement of NOP.*  YES  NO  If **YES**, did you utilize an industry private initiative, method, or tool?  GFSI Requirements  FSMA/FDA Traceability Requirements  OTA Organic Fraud Prevention Solutions  other (specify):  ***Fraud prevention plans must be available during inspections and provided upon request.*** | | | | | | | | | | |
| 2. Do you have an established organic fraud prevention point person and/or team?  YES  NO | | | | | | | | | | |
| 3. How often is a vulnerability assessment conducted? | | | | | | | | | | |
| 4. Have you conducted at least one organic fraud vulnerability assessment?  YES  NO | | | | | | | | | | |
| 5. Please indicate the components of your organic fraud prevent plan:  Map and/or inventory of the organic supply chain  Identified organic critical control points (hot spots) in your organic supply chain where organic fraud or loss of organic status is most likely to occur.  Supplier and product verification process to confirm, on an ongoing basis, the approved organic status of any supplier and/or product used  Description of traceability plan and key data elements to trace products  Organic mitigation measures to mitigate vulnerabilities  Supplier monitoring system, including verification activities  Described method to review fraud incidents and general market incidents  Description of training program for employees that includes organic fraud prevention  Practices and tools to assess effectiveness of Plan  Mechanism to report suspected fraud  Management Review & Sign Off | | | | | | | | | | |