



## OSP Processor - Handler

**Important:**

- Save a copy of this form to your desktop and complete via Acrobat Reader. DO NOT attempt to complete this form using Mac Preview or in your internet browser (e.g. Chrome, Firefox, Safari); it will not save.
- Save the document as a PDF. DO NOT "Print to PDF" as this renders an unreadable form.
- Send the completed PDF to PCO.

**Instructions:** Complete this form if you Process and/or Handle organic product(s).

- Processing: Cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring or otherwise enclosing food in a container.
- Handle: To sell, process, or package agricultural products, including but not limited to trading, facilitating sale or trade on behalf of a seller or oneself, importing to the United States, exporting for sale in the United States, combining, aggregating, culling, conditioning, treating, packing, containerizing, repackaging, labeling, storing, receiving, or loading. Handlers/Handling operations include (Marketers, Traders, Brokers, Distributors, Importers).

**SECTION 1 - General Information** **§205.201**

If you are a new applicant, attach a completed OSP General Information form. Do not leave any applicable sections blank. Write "none" or "not applicable" where appropriate. If you are a renewing client, use the General Information Form for reference only and complete an "Annual Update" form each year you renew.

General Information Form attached

Business Name:

First Name:

Middle Initial:

Last Name:

Phone:

1.1 Provide a description of activities your operation conducts:

1.2 Does your operation include an organic production facility or facilities?

- No (Skip to question 1.3)
- Yes

a) Attach map of the facility identifying organic production areas (including equipment and storage areas) and pest control device locations, as applicable.

- Map(s) attached

1.3 Is this operation:

- Organic only (Skip to Section 2)
- Organic and nonorganic

1.4 Do you process or handle nonorganic products identical to organic products?

- No (Skip to Section 2)
- Yes

a) List products:

1.5 Do you process or handle (sell, pack/repack, label/relabel, etc.) organic and non-organic product(s) on the same day?

- No (Skip to Section 2)
- Yes

a) How is organic product designated from non-organic product?

§205.201 requires that your OSP contain a list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable. See §205.301 for information on composition requirements pertaining to your final proposed product label claim. Salt and water are excluded from organic percentage calculations. Genetic modification, ionizing radiation, and sewage sludge must not be used in the production of any ingredients or processing aids.

2.1 Fill out enclosed Master Ingredient List, Master Product List and Formulation Sheet (Food or Feed, as applicable) for each organic product requested for certification. The product label(s) and documents to verify the organic status or compliance with the National List of Allowed and Prohibited Substances of the ingredient (e.g. organic certificate, import certificate, specification sheet, etc.) must be submitted to PCO for approval PRIOR to selling or marketing the product as organic.

- |   |   |
|---|---|
| <input type="checkbox"/> Master Ingredient List & Master Product List forms attached  | <input type="checkbox"/> Non-organic ingredient verification documentation attached (e.g. PCO Verification of Non-organic Ingredient Status Form, PCO Verification of Natural Flavor Form, PCO Commercial Availability Form, Manufacturer Specification Sheet, Safety Data Sheet, and/or Label, as applicable). |
| <input type="checkbox"/> Formulation Sheet (Food or Feed, as applicable) for each organic product attached                    |   |
| <input type="checkbox"/> Label(s) for each organic product attached   |   |
| <input type="checkbox"/> Organic certificate(s) for each organic product and/or ingredient (issued within 18 months) attached |   |

## 2.2 Co-Packing Clients

If you are a co-packer (i.e. you manufacture or package products on behalf of another company/brand owner), complete the table below for those who contract your organic processing/handling services. If clients are certified organic, attach a copy of their organic certificate(s). If your co-packing client is 1. An uncertified (exempt) private label company or 2. a private label company certified by another certifier, and their label(s) list their operation name in the handler/distributor statement and PCO is identified as the certifier in the "certified organic by..." statement, they must complete a [Private Label Agreement](#).

- N/A - do not co-pack for others  
 Organic certificate(s) attached.  
 Private Label Agreement attached.

Client	Address	Phone	Certifier (If client is uncertified write N/A)

Client	Address	Phone	Certifier (If client is uncertified write N/A)

Note: If additional space is needed attach an OSP Processor-Handler Addendum

OSP Processor-Handler Addendum attached

**2.3 Product Processing / Co-Packing Vendors**

If you use co-packers (*i.e. another company manufactures or packages products on behalf of your company*), list their names and certifiers, and attach a copy of their organic certificate.

N/A - do not use co-packers

Organic certificate(s) attached

Co-packer	Address	Phone	Certified by

Note: If additional space is needed attach an OSP Processor-Handler Addendum

OSP Processor-Handler Addendum attached

*Procedures, processes, storage and equipment must not present contamination risk to organic products from co-mingling with other non-organic products, sanitation products, pest management products or prohibited materials. Procedures used to maintain organic integrity must be documented.*

### PRODUCT FLOW

3.1 Attach a schematic product flow chart or written description that details where and how the product is received, stored, processed, packaged, and warehoused, identifying all pieces of equipment, storage areas and where ingredients are added or processing aids used. Submit a separate flow chart or description for each production type.

Product Flow Chart schematic and/or description attached

### 3.2 Equipment

If processing or handling unpackaged product(s), list all equipment in use. If additional space is needed attach an OSP Processor-Handler Addendum

N/A, I do not process unpackaged organic products (skip to Section 4)

OSP Processor-Handler Addendum attached

Name of equipment	State if equipment is dedicated organic or, if not, how it is cleaned prior to organic runs.	Rinsed? (Yes or No)	If rinsed, list final rinse material and amount used:	Do you document cleaning? (Yes or No)

Name of equipment	State if equipment is dedicated organic or, if not, how it is cleaned prior to organic runs.	Rinsed? (Yes or No)	If rinsed, list final rinse material and amount used:	Do you document cleaning? (Yes or No)

3.3 If equipment is purged, list and describe purge procedures, quantities purged, and documentation:

## ION EXCHANGE SYSTEM

3.4 Do you use an ion exchange filtration system in your organic production?

- No (Skip to section 4)
- Yes (Answer questions a-d below)

a) Describe how ion exchange filtration is used in your organic production:

b) Describe what contamination prevention practices you use (e.g. routine maintenance, testing, adherence to GMP's, etc):

c) Recharge substances used in your ion exchange filtration system must be listed on your Master Ingredient List and Master Product List forms and Formulation Sheet (Food or Feed, as applicable)

- Master Ingredient List, Master Product List and Formulation Sheet (Food or Feed, as applicable) attached.

d) Resins used in your ion exchange filtration system must be listed on your Materials Used Form.

- Materials Used Form attached

4.1 Is water used in direct contact with organic products or added to organic products (e.g. wash water, as an ingredient)? *Water used in food production must meet Safe Drinking Water Act (SDWA) standards.*

- No (Skip to question 4.4)  
 Yes

4.2 Do you add any substances or treat water (i.e. RO, UV) used in direct contact with organic products?

- No (Skip to question 4.3)  
 Yes (Answer questions a & b below)

a) Substances must be listed on Materials Used Form

- Materials Used Form (attached)

b) Describe your water treatment process:

4.3 Do you add chlorine to water that directly contacts organic products?

- No (Skip to question 4.4)  
 Yes (Answer questions a & b below)

a) Records or SOP used for monitoring chlorine must be attached and will be verified by your inspector.

- Records and/or SOP attached.

b) Do products undergo a final fresh water rinse? (Residual chlorine levels in water at the last point of contact must not exceed the maximum residual disinfectant limit under the SDWA.)

- Yes  
 No (If No, you are stating that chlorine was never added to water above SDWA limits.)



4.4 Is water that is used in processing (e.g. chilling, washing, floating, brining) of conventional products reused during processing of organic products?

- Yes
- No
- N/A, no conventional production

4.5 If steam is in use, does steam contact organic products or packaging?

- N/A, (Skip to Section 5)
- No (Skip to Section 5)
- Yes

4.6 Are boiler chemicals in use?

- No (Skip to Section 5)
- Yes

a) List each boiler chemical that is not turned off prior to organic production on your Materials Used Form and attach an ingredient statement for each.

- Each listed on Materials Used Form with ingredient statement(s) for each attached.

4.7 If volatile boiler chemicals are in use, describe how you prevent contact with volatile boiler chemicals when processing organic products?

- Explanation attached
- Explanation below

4.8 If non-volatile boiler chemicals are used, are they injected into the steam header?

- No (Skip to Section 5)
- Yes

a) You must demonstrate that the product does not end up in the steam.

- Documentation (i.e. test results showing levels of dissolved solvents in condensate) attached.

*An audit trail is documentation that is sufficient to determine the source, transfer of ownership, and transportation of any organic agricultural product. A successful recordkeeping audit trail will use receiving dates, lot numbers, batch dates, etc. to link incoming ingredients/inputs through all handling steps to final sale or distribution. Records used in an audit trail include and are not limited to purchase invoices, contracts, storage records, labels, sales invoices, organic certificates, bills of lading, and other transport documents. Additionally, §205.403 requires that two types of audits are conducted at each inspection:*

- *Mass-balance: to verify that the quantities of organic product and ingredients produced or purchased account for organic product and ingredients used, stored, sold and transported (i.e. inputs account for outputs)*
- *Traceback: A successful recordkeeping audit trail will use dates, lot numbers, field names, herd lists, etc. to link incoming livestock or products/inputs from initial purchasing by your operation, through all production steps (birth or acquisition of animals), and to final sale or distribution. Records used in an audit trail include and are not limited to purchase invoices, birth records, healthcare records, feed storage records, labels, sales invoices, organic certificates, bills of lading, hauling records.*

*An operation's recordkeeping system, as required by §205.103, must be sufficient to support the required audits conducted during the on-site inspection. Operations should review §205.103 of the organic regulations for specific recordkeeping requirements. If you have questions about what is required, contact PCO.*

5.1 How do you ensure that you maintain audit trail documentation that is sufficient to determine the source, transfer of ownership and transportation of organic products?

5.2 Does your audit trail documentation identify agricultural products on these records as "100% Organic" or "Organic"?

- Yes  
 No

5.3. Does your audit trail documentation contain information (e.g. Production lot number, shipping identification or other unique information) that links to your nonretail labels?

- Yes  
 No  
 N/A, nonretail labels not used

5.4 Does your audit trail documentation associated with a nonretail container identify the last certified operation that handled the product?

- Yes  
 No

5.5 Do you maintain recordkeeping to document quantities of organic products purchased or produced by your operation?

- Yes
- No

5.6 Do you maintain recordkeeping to document quantities of organic products used, stored, sold, transported or distributed by your operation?

- Yes
- No

5.7 Which of the following do you use to track organic products at this operation? Note: Records must be kept to track all activities and transactions and be adapted to the particular business of the certified operation.

**Incoming:**

- Purchase orders
- Contracts
- Invoices
- Receipts
- Bills of lading
- Customs forms
- Scale tickets
- Quality test results
- Certificates of Analysis
- Transaction Certificates
- Organic Certificates
- Import Certificates
- Exempt Handler Affidavits
- Receiving records
- Receiving summary log (12 mos.)
- Other (specify):

**In process:**

- Ingredient inspection forms
- Blending reports
- Production reports
- Equipment cleanout logs
- Sanitation logs
- Packaging reports
- Quality Assurance reports
- Production summary records (12 mos.)
- Other (specify):

**Storage:**

- Ingredient inventory reports
- Finished product inventory reports
- Other (specify):

**Outgoing:**

- Shipping logs
- Sales invoices
- Other (specify):

5.8 Do you utilize a lot coding system (i.e. system by which you assign numbers to different product batches in order to trace product(s)?

- No (Skip to question 5.9)
- Yes

a) Describe:

5.9 Do you have a product recall system in place?

- No (Skip to question 5.10)
- Yes

a) Describe:

5.10 Describe how you monitor the effectiveness of your Record Keeping System:

5.11 How often do you conduct Record Keeping System monitoring?

- Weekly
- Monthly
- Annually

- As needed
- Other (specify):

*Good sanitation practices must be used throughout the facility and residues from cleaning materials must not contaminate organic products. Your standard operating procedure for sanitization must be available at inspection.*

N/A, I do not have a facility that processes or handles organic product(s) (skip to Section 7).

6.1 Check all cleaning methods used:

- |   |   |
|---|---|
| <input type="checkbox"/> Sweeping       | <input type="checkbox"/> Clean in Place (CIP) |
| <input type="checkbox"/> Scraping       | <input type="checkbox"/> Steam cleaning       |
| <input type="checkbox"/> Vacuuming      | <input type="checkbox"/> Sanitizing           |
| <input type="checkbox"/> Compressed air | <input type="checkbox"/> Other (specify):     |
| <input type="checkbox"/> Hand washing   |   |

6.2 Describe your cleaning program (Note: List all cleansers/sanitizers on Materials Used Form and indicate whether they are rinsed):

Materials Used Form attached

6.3 How do you ensure no residues from prohibited materials (e.g. quaternary ammonia) remain on organic contact surfaces?

N/A, no prohibited materials used  
Rinsing  
Complete drying of alcohol-based sanitizers

Residue Testing:  
pH  
Quaternary Ammonia (if used, a residue testing procedure is required)  
Other testing (specify):

6.4 Describe how you monitor the effectiveness of your sanitation program:

6.5 How often do you conduct Sanitation program monitoring?

- Weekly
- Monthly
- Annually

- As needed
- Other (specify):

Complete this section to describe pest control practices and materials used in any facility where organic products are produced and/or stored, including but not limited to storage areas, loading docks, warehouses and packing areas. Note: Questions in this section are still required for operations using contracted pest control companies.

N/A, I do not warehouse, distribute, or store organic products (Skip to Section 8).

7.1 Check which facilities you use for your organic products:

N/A. I have no buildings/facilities that are used for any portion of my organic operation (Skip to Section 8)

Storage areas

Loading docks

Warehouses

Packing areas

Production areas

7.2 Attach facility map showing location of pest traps and monitoring devices.

Map Attached

7.3 Who is responsible for pest control in your facility?

In-house

Contracted pest control service (name):

7.4 Which of the following management practices do you use to prevent pests? (Must use at least one)

Remove pest habitat, food sources, and breeding areas

Other (specify):

Prevent access to handling facilities

Manage environmental factors to prevent pest reproduction (temperature, light, humidity, atmosphere, air circulation)

7.5 Which of the following practices do you use to control pests in organic production and storage areas? (Must check at least one)

N/A, the preventative practices used in 7.4 above are sufficient to control pests

Mechanical or physical controls, including traps, light or sound

Lures and repellents using non-synthetic or synthetic substances consistent with the National List of Allowed and Prohibited Substances.

List lures and repellents that you apply in organic production and storage areas on your Materials Used Form.

Materials Used Form attached



7.6 If the measures listed in 7.4 and 7.5 above are not sufficient to prevent or control pests, do you use any of the following: (Note: List all pest control input materials that you apply in organic production and storage areas on your Materials Used Form.)

- |  |  |
|--|--|
| <input type="checkbox"/> N/A, measures listed in 7.4 and 7.5 are sufficient to prevent and control pests | <input type="checkbox"/> Boric acid                          |
| <input type="checkbox"/> Carbon dioxide  | <input type="checkbox"/> Diatomaceous earth                  |
| <input type="checkbox"/> Nitrogen gas  | <input type="checkbox"/> Soap products                       |
| <input type="checkbox"/> Vitamin D3 bait   | <input type="checkbox"/> Other non-synthetic input materials |
|  | <input type="checkbox"/> Other synthetic input materials*    |

*\*Note: A Synthetic Facility Pest Management Agreement form may need to be completed in order to use certain synthetic input materials. This form must be submitted to PCO PRIOR to the use of those input materials. Check with PCO to determine if this form is required.*

7.7 How do you prevent pest control input materials from contacting organic products, ingredients, and packaging materials?

- |  |  |
|--|--|
| <input type="checkbox"/> N/A, no pest control input materials used             | <input type="checkbox"/> Cover equipment used for food handling  |
| <input type="checkbox"/> Remove product and packaging from areas to be treated | <input type="checkbox"/> Purge equipment with nonorganic product |
| <input type="checkbox"/> Wash and rinse food contact surfaces after treatment  | <input type="checkbox"/> Other (specify):                        |

7.8 Where do you record pest control input material use and measures taken to protect organic products or packaging?

- |   |   |
|---|---|
| <input type="checkbox"/> N/A, no pest control input materials used                | <input type="checkbox"/> Purge log        |
| <input type="checkbox"/> Pesticide Use Log  | <input type="checkbox"/> Other (specify): |
| <input type="checkbox"/> Log describing removal/reentry of products and packaging |   |

7.9 Describe monitoring (including frequency) used to determine the effectiveness of management practices above:

Packaging materials must be free of prohibited substances and must not contaminate the organic product. Organic product labels must meet National Organic Program labeling requirements.

- We are not responsible for packaging organic products (i.e. you do not package and/or have oversight of packaging materials such as purchasing). If checked you must provide an explanation then you may skip to the LABELING questions in this section. Explanation:

**PACKAGING:**

8.1 Check types of packaging material used:

- |                                    |  |
|------------------------------------|--|
| <input type="checkbox"/> Paper     | <input type="checkbox"/> Plastic         |
| <input type="checkbox"/> Cardboard | <input type="checkbox"/> Waxed paper     |
| <input type="checkbox"/> Wood      | <input type="checkbox"/> Aseptic         |
| <input type="checkbox"/> Glass     | <input type="checkbox"/> Natural fiber   |
| <input type="checkbox"/> Metal     | <input type="checkbox"/> Synthetic fiber |
| <input type="checkbox"/> Foil      | <input type="checkbox"/> Other(specify): |

8.2 Are all packaging materials food grade?

- Yes
- No

8.3 Are all packaging materials free of prohibited materials (e.g. fungicides, preservatives, fumigants)?

- Yes
- No

8.4 Are packaging materials returnable?

- No (Skip to the LABELING questions in this section)
- Yes

a) How are they cleaned?

## LABELING

Labels used to represent products as organic must meet the requirements established in §205.300-311. Refer to the [PCO Organic Labeling Guide](#) for guidance on organic regulatory labeling requirements.

- We are not responsible for labeling organic products. (This includes labels identifying your brand, labels being applied by your operation on your behalf, labels being applied on your behalf by another operation, and/or labels you apply on behalf of another brand/company). If checked you must provide an explanation below then you may skip to Section 9.

Explanation:

8.5 Are any retail labels in use (i.e. used on packages for the final consumer) that either identify your operation or are applied by your operation?

- No (Skip to question 8.6)  
 Yes

a) Attach a color copy of the label(s) (including all sizes, inner packaging, etc.)

Label(s) attached). Retail label(s) must:

- Identify the ingredients as organic in the ingredient statement
- Identify PCO as the certifier directly below the contact info of the operation using the phrase “Certified Organic by PCO” or a similar phrase (*NOTE: If your labels list another operation as the distributor, their organic certifier may be listed. If they are not certified, a Private Label Agreement may be needed.*)

8.6 Are any nonretail labels (i.e. used on packages for shipping or storing, including wholesale) that either identify or are applied by your operation in use?

- No (Skip to questions 8.7)
- Yes

a) Attach a color copy of the label(s)

Label(s) attached). Nonretail label(s) must include:

- Identification of the product as organic
  - Nonretail containers used to ship organic products that are labeled for retail sale with organic identification visible on the retail label do not require additional identification of the product as organic on the nonretail label
- Production lot number, shipping identification or other unique information that links the nonretail container to the audit trail documentation

8.7 Are any labels for products in other than packaged form (e.g. twist ties, PLU stickers, etc.) used?

- No (Skip to question 8.8)
- Yes

a) Attach a color copy of the label(s)

Label(s) attached).

8.8 Are any labels (including tags) for livestock feed that either identify or are applied by your operation in use?

- No (Skip to question 8.9)
- Yes

a) Attach a color copy of the label(s)

Label(s) attached). Livestock feed labels must:

- Identify PCO as the certifier directly below the contact info of the operation using the phrase “Certified Organic by PCO” or a similar phrase (*NOTE: If your labels list another operation as the distributor, their organic certifier may be listed. If they are not certified, a Private Label Agreement may be needed.*)
- Comply with other Federal agency or State feed labeling requirements as applicable.

8.9 Do you use or plan to use any marketing information for your organic products?

- No (Skip to question 8.10)
- Yes

a) Describe the types of marketing information (e.g. website, social media, farm market signs, brochures, etc.) you use:

8.10 Do you use or plan to use the USDA organic seal on product labels or marketing materials?

No (Skip to question 8.11)

Yes

a) Do you intend to use the black and white version or color version?

Black and white

Color

8.11 Do you use or plan to use the PCO organic logo on product labels or marketing materials?

Yes

No

*No commingling or contamination of organic products may occur during storage. All storage sites must be properly documented and organic products clearly identified in storage. Off-site storage areas may need to be inspected and certified.*

- We are not responsible for storage of organic products (i.e. you do not store any ingredients and/or products on or off-site and/or don't arrange and have oversight over storage activities). If checked you must provide an explanation below then you may skip to Section 10.

Explanation:

#### 9.1 Storage information:

Use	Where Stored?	Type/Capacity	Dedicated Organic? (Indicate Yes or No)	Identification
Ingredient Storage			<input type="checkbox"/> yes <input type="checkbox"/> no	
Packaging Material Storage			<input type="checkbox"/> yes <input type="checkbox"/> no	

Use	Where Stored?	Type/Capacity	Dedicated Organic? (Indicate Yes or No)	Identification
In-Process			<input type="checkbox"/> yes <input type="checkbox"/> no	
Finished Product Storage			<input type="checkbox"/> yes <input type="checkbox"/> no	
Off-Site Storage* (complete 9.2)			<input type="checkbox"/> yes <input type="checkbox"/> no	

9.2 \*If there is off-site storage, provide name, address, phone number and contact person:

N/A, no off-site storage



*Transport* (movement of product(s) on a transportation vehicle e.g. moving organic grain or organic livestock from certified organic farms to a certified handling or slaughter facility) and *transloading* (moving products between transportation vehicles) do not require certification. Any other transportation adjacent activities including, but not limited to: combining, splitting, labeling/relabeling, loading/unloading unpackaged products into or from storage facility, etc. are considered handling and require certification, unless covered by exemptions 205.101(e) or (f). Certified organic operations responsible for organic products that are transported must: maintain sufficient records (for audit trail and traceability); demonstrate prevention of commingling; fully describe transportation practices in OSP; and have transportation records available at inspection.

Transporters/haulers must be certified if they engage in the following activities:

- buying/selling organic ingredients or products (unless they meet the exemption at 205.101(f))
- non-exempt handling activities such as combining lots of organic ingredients or products
- loading or unloading unpackaged organic ingredients or products at uncertified locations

- We are not responsible for transportation of organic products (i.e. you do not transport any ingredients and/or products and/or don't arrange and have oversight over transportation activities). If checked you must provide an explanation below then you may skip to Section 11.

Explanation:

10.1 Do you use a third party transportation company to haul/transport organic ingredients or product(s)?

- No (Skip to RECEIVING questions in this section)  
 Yes (Answer questions a-c below)

a) Provide the name(s) of the persons/companies used to transport/haul ingredients or products:

b) Is the third party transporter/hauler certified organic?

Yes. Organic certificate attached.

No

c) Describe any activities that transporters/haulers you use engage in regarding your products beyond transportation (e.g. brokering or facilitating trade, applying labels, etc.):

N/A (transportation only)

**RECEIVING**

We are not responsible for receiving/receipt of organic products (including arranging and/or having oversight over receiving activities). If checked you must provide an explanation below then you may skip to the SHIPPING questions in this section below.

Explanation:

10.2 Do you ever receive organic and non-organic products at the same time or in the same vehicle?

- No (Skip to question 10.3)
- Yes

a) What steps are taken to prevent commingling of organic and non-organic products?

- Labeled pallets
- Organic product sealed or shrink
- Designated organic and nonorganic areas wrapped
- Other (specify):

10.3 Do any products arrive unsealed or in permeable packaging (e.g. clamshells, open boxes, trucks) or in reusable containers/vehicles (e.g. RPCs, tankers, railcars)?

- No (Skip to SHIPPING questions in this section)
- Yes

a) How do you ensure contamination and commingling were prevented during transport (e.g. protection from sanitizer residue, gases, liquids)? Check all that apply.

Note: Transporter records must be available for review at inspection, e.g. bill of lading, manifest, transaction certificate, shipping and delivery records, invoices, chain of custody, truck and trailer numbers, lot number.

- Clean truck affidavit
- Cleaning and sanitizing material records
- Certified supplier provides documentation
- Truck cleaning procedures
- Wash tags
- Tanker Seals
- Other (specify):

**SHIPPING**

- We are not responsible for shipping/shipment of organic products (including arranging and/or having oversight over shipping activities). If checked you must provide an explanation below then you may skip to the MONITORING questions in this section below.

Explanation:

10.4 How do you prevent commingling of outgoing organic and nonorganic products?

- |   |  |
|---|--|
| <input type="checkbox"/> Organic never shipped with nonorganic    | <input type="checkbox"/> Separate areas in vehicle |
| <input type="checkbox"/> Clearly labeled packages/pallets         | <input type="checkbox"/> Other (specify):          |
| <input type="checkbox"/> Organic product sealed or shrink wrapped |  |

10.5 Are any products shipped in unsealed or permeable packaging (e.g. clamshells, open boxes, trucks) or in reusable containers/vehicles (e.g. RPCs, tankers, railcars)?

- No (Skip to MONITORING questions in this section)  
 Yes

a) How do you ensure contamination and commingling will be prevented during transport (e.g. protection from sanitizer residue, gases, liquids)? (Check all that apply).

*Note: Transporter records must be available for review at inspection, (e.g. bill of lading, manifest, transaction certificate, shipping and delivery records, invoices, chain of custody, truck and trailer numbers, lot number, clean truck affidavits, wash tags, etc.)*

- |  |   |
|--|---|
| <input type="checkbox"/> Clean truck affidavit                     | <input type="checkbox"/> Wash tags        |
| <input type="checkbox"/> Cleaning and sanitizing material records  | <input type="checkbox"/> Tanker Seals     |
| <input type="checkbox"/> Certified supplier provides documentation | <input type="checkbox"/> Other (specify): |
| <input type="checkbox"/> Truck cleaning procedures                 |   |

**MONITORING**

10.6 Describe how you monitor the effectiveness of your Organic Transportation Plan in maintaining the organic integrity of organic products.

10.7 How often do you conduct Organic Transport monitoring?

- |                                   |   |
|-----------------------------------|---|
| <input type="checkbox"/> Weekly   | <input type="checkbox"/> As needed        |
| <input type="checkbox"/> Monthly  | <input type="checkbox"/> Other (specify): |
| <input type="checkbox"/> Annually |   |

N/A, My operation does not sell any waste products as organic, or have a waste management system. (Skip to Section 12)

11.1 Will any waste products from certified organic ingredients be sold as certified organic?

- No (Skip to question 11.2)  
 Yes

a) Complete a Formulation Sheet (Food or Feed, as applicable) for each product.

Formulation Sheet (Food or Feed, as applicable) attached

11.2 Check all aspects of your waste management system that apply:

- |   |   |
|---|---|
| <input type="checkbox"/> On-site dumpster   | <input type="checkbox"/> Composting                 |
| <input type="checkbox"/> Material recycling | <input type="checkbox"/> Daily pickup of waste      |
| <input type="checkbox"/> Water recycling    | <input type="checkbox"/> Sediment ponds             |
| <input type="checkbox"/> Water filtering    | <input type="checkbox"/> Field application of waste |
| <input type="checkbox"/> Smokestack filters | <input type="checkbox"/> Other (specify):           |

§205.201(a)(3) requires that the Organic System Plan (OSP) of a certified operation include a description of the monitoring practices and procedures to verify suppliers in the supply chain and organic status of agricultural products received, **and to prevent organic fraud, as appropriate to the certified operation's activities, scope, and complexity.**

Fraud prevention plans must describe practices that verify the organic status of suppliers and organic products, including how an operation verifies organic status back to the last certified operation in the supply chain (including transporters and exempt handlers within the supply chain). This supports the record keeping and audit trail requirements at §205.103(b)(2) and allows certifiers to verify compliance during on-site inspections and supply chain traceability audits. Consider your operation's sourcing and selling of organic products and develop a plan that pertains to your operations' activities, including scope and complexity.

12.1 Do you work with any exempt handlers (i.e. uncertified handlers - cold storage facilities, seed dealers, etc.)?

No (Skip to question 12.2)

Yes (Answer questions a & b below)

a) Check the types of activities the exempt handlers you do business with provide for your operation (check all that apply):

Storage/Warehousing\*

Brokering\*

Wholesaling\*

Distributing\*

Trading\*

Transporting/transloading

Licensed customs brokering (as defined per [19 CFR 111.1](#))

Logistics brokering (e.g. freight forwarding)

Other (specify)\*:

b) \* The asterisk (\*) indicates activities that require a completed Exempt Handler Affidavit (EHA). If the operation you work with conducts any of these activities identified with an asterisk (\*), they must complete the EHA.

Exempt Handler Affidavit(s) attached (Skip to question 12.2)

N/A, activities above do not contain an asterisk (Answer question c below)

c) Does the exempt handler provide full traceability\*\* back to the last certified operation for each shipment?

Yes

No, explain:

**\*\*Note:** Full traceability includes the following, as applicable:

- Identification of product as organic on nonretail containers
- Current organic certificate of the last certified organic operation
- Documents generated by the last certified operation to the exempt handler proving purchase, delivery and/or transfer
- Purchase invoices, receipts, bills of lading or other audit trail documentation
  - Other audit trail documentation must designate the product as organic, include a description of the product, date of transaction and amount transferred, and list the last certified operation and/or lot numbers applied by the last certified operation. (must match lot numbers on exempt handler audit trail documentation)

12.2 Describe the areas in your supply chain where:

- fraud is most likely to occur;
- where you are most likely to notice if purchased ingredients or products do not have organic certification; and
- integrity of the organic product may be compromised (e.g. co-mingling with non-organic products, contamination by sanitizers or pesticides)

(Note: These are often referred to as “critical organic control points”)

A large, empty rectangular box with a black border, intended for the user to describe the areas in their supply chain where fraud is most likely to occur, where they are most likely to notice if purchased ingredients or products do not have organic certification, and where the integrity of the organic product may be compromised.



12.3 How do you prevent fraud and ensure your supply chain is compliant? Check all that apply:

- I participate in an existing Fraud Prevention Plan or Program (e.g. GFSI Food Fraud Vulnerability Assessment, OTA Organic Fraud Prevention Solutions)
- I've created a map or inventory of my supply chain that identifies suppliers
- I identify critical organic control points in my supply chain where organic fraud or loss of organic status are most likely to occur
- I conduct an assessment to identify weaknesses in my procedures to ensure my suppliers and products I purchase are organic
- I have practices for verifying the organic status of any product I acquire and/or use prior to use
- I have a process to verify suppliers and minimize supplier risk to organic integrity prior to using a supplier
- I initiate mitigation measures to correct vulnerabilities and minimize risks (as identified in my assessment)
- I have regular monitoring practices and verification tools to assess the effectiveness of my mitigation measures
- Other (specify):

12.4 Describe the practices you use to verify the organic status of suppliers:

12.5 Describe the practices you use to verify the organic status of products acquired/used:

12.6 How do you monitor the effectiveness of your fraud prevention plan?

- |   |   |
|---|---|
| <input type="checkbox"/> Residue test results | <input type="checkbox"/> Internal audits  |
| <input type="checkbox"/> GMO test results     | <input type="checkbox"/> Other (specify): |
| <input type="checkbox"/> Mock recall          |   |

12.7 How often do you monitor the effectiveness of your fraud prevention plan?

- |                                   |   |
|-----------------------------------|---|
| <input type="checkbox"/> Weekly   | <input type="checkbox"/> As needed        |
| <input type="checkbox"/> Monthly  | <input type="checkbox"/> Other (specify): |
| <input type="checkbox"/> Annually |   |

12.8 Describe your process for reporting suspected organic fraud to PCO and/or the NOP:



13.1 If your operation is a livestock auction facility you must complete and attach a Livestock Auction Facility OSP Supplement

- N/A, my operation is not an auction facility.
- Livestock Auction Facility OSP Supplement attached.

13.2 If your operation/facility slaughters organic livestock you must complete and attach a Slaughter Facility OSP Supplement.

- N/A, my operation is not a slaughter facility
- Livestock Slaughter Facility OSP Supplement attached.

13.3 If your operation imports or exports organic product(s) you must complete and attach an International Trade OSP Supplement.

- N/A, my operation does not import or export organic product(s)
- International Trade Supplement attached

SECTION 14 - Additional Comments:

[Empty box for additional comments]