

Recordkeeping Requirements - Handlers

AUDIT TRAIL: An audit trail refers to records that track a certified product, from receiving ingredients to shipping finished product to the marketplace. Developing and maintaining these records is required for certification, and enables a faster inspection and file review, saving time and money. Read the following for tips on maintaining effective records, which must be maintained for 5 years and available at inspection. The audit trail elements described below are not necessarily the only records you need; records must be adapted to your operation. Formats may differ, but records must demonstrate a complete and unbroken audit trail. Contact MOSA with questions.

LOT NUMBERING SYSTEM: All organic products must be traceable back to their origin. **Lot numbering systems** are commonly used to meet this requirement. Incoming product/ingredient lot numbers should be noted and linked to any new lot number you assign. Lot numbers are utilized in receiving, production, storage and sales records, and on outgoing retail products and shipping documents to maintain traceability of a product and its components throughout the entire process.

INSPECTOR SAMPLE AUDIT: At your inspection, the inspector will conduct a sample audit to test your audit trail system. This sample audit could take different forms. A *trace-back* audit starts with a finished product and traces the audit trail back to the raw organic ingredients. A *trace-forward* audit does the reverse, with the inspector deciding what quantity of raw product to trace forward. A *balance in-balance out* audit will look at ingredients coming into the system and finished product going out of the system over a time period chosen by the inspector. Batch records may be compared to Organic Product Profiles submitted. Sample audits can be randomly selected from any organic production date and are not chosen prior to the inspection.

INGREDIENTS DOCUMENTATION: *The MOSA Ingredients Monitoring Spreadsheet helps you monitor current certification or other compliance verification for various ingredients, especially if you have a large number of ingredients to track.*

Organic Ingredients: Proof of current certification for all organic ingredients is required. A copy of the supplier's annual organic certificate, a Transaction Certificate (TC), or a statement from the supplier's organic certifier must be kept on hand to verify organic status. The verification of current certification should clearly identify the ingredient by name.

Non-Organic Agricultural Ingredients: When non-organic *agricultural* ingredients are used in organic processing, **non-organic ingredient compliance documentation** must be obtained to verify the ingredients were not derived from genetically modified organisms (GMOs), produced using sewage sludge as a fertilizer, or treated with ionizing radiation. *The MOSA Non-GMO Verification form* may be used for this purpose. Also, for products labeled as "organic," any nonorganic agricultural ingredients used must be on the National List at section 205.606, and an **organic ingredient search** must be conducted and documented to verify that organic ingredients were not commercially available.

Non-Agricultural Ingredients: Non-agricultural ingredient compliance documentation must be obtained to verify the ingredients' compliance with National Organic Standards annotations. Documentation requirements vary depending on the type of ingredient, so check the National List or the OMRI listing for specific compliance verifications needed.

OTHER AUDIT TRAIL RECORDS REQUIRED FOR CERTIFIED OPERATIONS:

Purchase records: The purchase dates and quantities of ingredients and processing aids used in your organic processing operation must be documented. Keep invoices, receipts, BOLs, contracts, and other purchase records.

Receiving log: A receiving summary log should list product lot numbers as well as receiving dates and quantities for all incoming ingredients.

Production records: Track the amounts and lot numbers for ingredients used in organic products and link specific ingredients to their final product. The MOSA Audit Control Summary Sheet may be used to track ingredients.

Sales records: These include sales invoices, BOLs, purchase orders, and/or TCs. Sales records should include date of transaction, product lot number, operation's name, type of product sold, and purchase price. Describe the product as "organic" on the BOL and invoice. To track net sales for calculating user fees, records must show gross organic sales (including fees charged for organic processing services), and your cost for certified organic ingredients used as inputs. You must keep sales records that show the inspector and reviewer that organic products are not commingled with the same conventional product you manufacture, and that conventional product is not sold as organic.

EQUIPMENT, STORAGE, AND TRANSPORT DOCUMENTATION:

Equipment cleaning before organic product contact occurs must be documented, especially if equipment is used for nonorganic production. Sanitation logs may be used to document cleaning prior to organic production, or *the Cleaning Log form may be used*. Documentation of clean transportation, such as **clean truck affidavits** both for incoming ingredients and outgoing product, should be maintained. *The MOSA Off-Site Transportation Cleaning Affidavit may be*

used for this purpose. If any transport units are used during the production process (e.g. tubs, carts, etc.) and are not dedicated for organic use, they must also be documented as clean.

Storage inventory records must be maintained and at minimum should include: storage unit identification for bulk raw product, product lot number, amount and date of incoming product, amount and date of outgoing product, the disposition or destination of the product, and current balance of product. If bulk storage units or silos are not dedicated organic, they must be cleaned before storing organic products, and cleaning needs to be documented on a **storage cleaning log or sanitation log** that indicates the date, storage unit ID, method of cleaning, and signature or initials of the person responsible for the cleaning.

DOCUMENTATION OF MATERIALS USED IN ORGANIC PRODUCTION:

Materials include pesticides, cleansers, boiler additives, or other products necessary for processing. **Materials records** used to verify compliance include all labels, receipts, and ingredient listings for these types of inputs. Labels or receipts should provide the supplier's name and contact information, and a complete ingredient listing. *MOSA's Handler Materials Inventory form can be used to list these materials and how they're used.* **Input usage logs** include sanitation and pest control logs in a form suited to your operation. They must contain complete information on application and use. **Monitoring records** should also be kept as part of the audit trail. Monitoring records include water tests and other product quality tests.

If cleaners/sanitizers will be in contact with organic product, they may contain only active ingredients that are allowed on the National List. Other cleaners and sanitizers may be used if you can document that these materials do not contact organic product or food contact surfaces, or that there is an intervening event sufficient to remove residues. Sufficient intervening events include rinsing or allowing the material to dry, followed by documented residue testing indicating no residues remain. Materials such as quaternary ammonia that leave a persistent residue are more problematic but may be allowed if you can verify, such as through residue testing, that these materials do not contaminate organic product.

For pest control, follow the steps outlined in National Organic Standards section 205.271. Preventive management practices must be used first. If those practices are shown to be ineffective, you may use materials that are allowed in the Standards. *Use of pest control materials that are prohibited in the Standards are only allowed if you can document that preventive practices and allowed materials are insufficient to control pests, and if the use of such materials is part of your approved organic pest management plan .*

OTHER SUPPORTING DOCUMENTATION:

Develop a **facility map** with all areas of the operation clearly labeled. Facility maps should identify all features of importance (equipment, receiving areas, storage locations, etc.). Be sure to show all areas under your management on the facility maps, including all conventional areas.

Develop a complete written description or schematic product **flow chart** that shows the movement of all organic products, from incoming/receiving through production to outgoing/shipping. Indicate where ingredients are added and/or processing aids are used. All equipment and storage areas must be identified. Organic Control Points (OCPs) should be noted on the processing flow chart. OCPs are points in a production system where the integrity of the organic product may be compromised if proper management is not in place. Examples include improper cleaning of a piece of equipment prior to running organic product, resulting in commingling with non-organic products left in the equipment, or use of a prohibited pesticide when organic product is present, resulting in contamination by a prohibited substance.

Facility pest maps should indicate the locations of all traps, bait stations, and other pesticide applications.

All operations certified by MOSA are required to keep a **complaint log**, even if no complaints are received. *The MOSA Complaint Log form* can be used for tracking complaints and how they were addressed.

LABELING REQUIREMENTS: *ALL organic product retail labels MUST be reviewed and approved by MOSA prior to use in the marketplace. Retail labels must include the statement "Certified organic by MOSA" or similar phrase, placed below or immediately next to the information identifying your company, and identify all organic ingredients in the ingredients statement with the word "organic" or with an asterisk or other reference mark and the word "organic." ALL non-retail labels MUST include the lot number. Other label elements are optional, provided they follow guidelines in the Standards, including specifics related to the category of product ("100% Organic," "Organic," or "Made with Organic...").*

RESOURCES:

Free information for the Upper Midwest: MOSES (www.mosesorganic.org/715-778-5775)

Free information and custom research for the USA: ATTRA (www.attra.ncat.org/800-346-9140)

Organic processing information: Organic Processing <http://www.organicprocessing.com/magazine.htm/> 310-745-0941

Industry information and advocacy: Organic Trade Association: (<http://www.ota.com/> 413-774-7511)

Sourcing organic ingredients and services: Organic Pages Directory (www.theorganicpages.com/topo/index.html)