Operation Name: _____   **Date:** _____

Certified operations shall maintain records concerning the production, harvesting, and handling of cannabis and nonmanufactured cannabis products. The records shall fully disclose all activities and transactions in enough detail to be readily understood and audited. Records shall be sufficient to demonstrate compliance with OCal regulations, kept for at least five (5) years, and made available for inspection.

A. Records Kept

1) Based on the activities described in your OCal System Plan (OSP), does your operation:

   - Maintain all records needed to verify compliance, and
   - Keep these records for at least 5 years, and
   - Make them available during inspections

   ☐ Yes

2) Per 3 CCR §10105 (b), I attest that all fertilizers requested for approval are registered with the state of California pursuant to 3 CCR § 2320.3, which states that fertilizing materials making claims of compliance to the NOP standards or claims for use in organic crop and food production shall be registered as an organic input material with the California Department of Food and Agriculture.

   ☐ Yes

Records needed to verify compliance include, but are not limited to, the following:

If you do this:	Maintain this type of record:
Grow cannabis	• Planting records (crop, location, date, acreage, etc.) • Records of crop rotation or practices in lieu of rotation (container production) • Documentation of natural resource and biodiversity conservation practices & monitoring • Documentation of preventative pest management practices • Production equipment also used for non-OCal/non-organic: cleaning records or Standard Operating Procedures (SOPs)
Use seed or planting stock	• Purchase receipts or other records documenting source, treated/untreated status and , non-GMO verification • Commercial availability records • OCal certificates or on-farm production records
Use crop input materials (fertilizers, pesticides, etc.)	• Purchase receipts or other records documenting source • Application records (material name, date, rate, location) • Compost/compost tea/vermicompost produced by your operation: production records
Have OCal parcels with adjacent non-organic/non-OCal production	• Documentation of preventative measures to reduce drift risk • If growing cannabis in buffer zones: harvest and sales documentation verifying separation
Responsible for harvest and/or transport	• Harvest/transport equipment also used for non-OCal: cleaning records or SOPs • Harvest records or field tags (date, crop, quantity, location) • Transport or shipping records, if applicable
Store crops	• Storage records • Storage at your own facility: facility pest management records
Simple post-harvest handling	• Records of handling activities, including facility pest management
Use another operation's facility for post-harvest handling	• Documentation of transactions (e.g. receiving, sales)
Source OCal cannabis products from another operation	• Transaction and shipping/receiving records • OCal certificates for suppliers
Sell OCal cannabis products (even if not represented as OCal)	• Shipping or sales records (e.g. BOLs, delivery receipts, receiving documents, grower statements, etc.) • Identify within the Department of Cannabis Control Track-and-Trace system, in a manner specified by the DCC regulations

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3 CCR § 10104, 10105

RECORD KEEPING

OSP SECTION: **OCal C8.0**

Find all forms at www.ccof.org/documents. Send completed forms to inbox@ccof.org.

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B. Sample Audit Trail

1) Attach a sample audit trail to demonstrate your recordkeeping system from harvest through sale.

   *An audit trail is a set of documents that tracks all activities occurring from **harvest** through **sale** of an OCal product and is sufficient to trace OCal cannabis and nonmanufactured cannabis products back to their production (in the field, or supplier). A complete sample audit trail may include, but is not limited to, the harvest, shipping, and sales records described above in section A.*

   *If you are new to OCal production and do not have existing OCal audit trail records, you **must** provide an **example** of the audit trail you plan to maintain. Sample recordkeeping forms can be found at www.ccof.org/recordkeeping.*

   ☐ Sample audit trail attached

2) How do your audit trail records link to track OCal cannabis from the source (field/growing location, or supplier) to the final sale? Mark all that apply.

   ☐ Field numbers or names   ☐ Farm name, if the operation is all OCal with only one field   ☐ Julian date codes

   ☐ Lot numbers (describe lot numbering system): _____

   ☐ Other (describe): _____

C. Split Operation Record Keeping

*A split operation is an operation that produces or handles **both OCal and non-OCal cannabis/nonmanufactured cannabis products**.*

1) Mark all of the following that apply to your operation:

   ☐ Grow both OCal and non-OCal cannabis

   ☐ Sell OCal and non-OCal nonmanufactured cannabis products, including any that you source from other operations

   ☐ Sell **identical** OCal and non-OCal nonmanufactured cannabis products, including any that you source from other operations

   ☐ None of the above. Stop, this form is complete.

2) How do your input records distinguish between materials used on OCal and non-OCal/nonorganic crops?

3) How do your harvest, shipping, and sales records distinguish between OCal and non-OCal cannabis/nonmanufactured cannabis products?

4) Do you source OCal nonmanufactured cannabis products from uncertified brokers, traders, wholesalers, or distributors?

   Sourcing from uncertified handlers requires additional audit trail verification at inspection and will incur additional fees.

   ☐ No. Stop, this form is complete.

   ☐ Yes, attach an **OCal Uncertified Handler Affidavit** (OCal UHA) for each uncertified supplier refer to the **Guide to OCal Handler OSP Forms** to complete applicable form for other handling or distribution services.

   a) How do you ensure that only certified suppliers are used by the uncertified handler? Check all that apply.

   Your OSP must list all certified suppliers, including products sourced through uncertified handlers. Audit trail records must link directly back to the last certified operation.

   ☐ Do not place order until certified supplier is identified by uncertified handler and approved by CCOF

   ☐ For any delivery that cannot be traced back to the certified supplier, refuse or hold shipment until the certified supplier is verified.

   ☐ Other (describe): _____

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