



**Operation Name:** \_\_\_\_\_ **Date:** \_\_\_\_\_

*Certified operations must maintain records of the production, harvesting, and handling of organic crops that fully disclose all activities and transactions in enough detail to be readily understood and audited.*

*Records must span the time from production (or purchase or acquisition) to sale or transport to the next certified operation and must be traceable back to your operation.*

*Records must be sufficient to demonstrate compliance with organic regulations, kept for at least five years, and made available for inspection.*

**A. Records Kept**

1) Based on the activities described in your Organic 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, my operation does the above.

*Records needed to verify compliance include, but are not limited to, the following. **Optional sample recordkeeping forms you may use to document many of the activities below can be found at [www.ccof.org/recordkeeping](http://www.ccof.org/recordkeeping).***

If you do this:	Maintain this type of record:
Grow crops	<ul style="list-style-type: none"> <li>• Planting records (crop, location, date, acreage, etc.)</li> <li>• Records of crop rotation or practices in lieu of rotation (perennials, container crops)</li> <li>• Documentation of natural resource and biodiversity conservation practices &amp; monitoring</li> <li>• Documentation of preventative pest management practices</li> <li>• Production equipment: cleaning records or Standard Operating Procedures (SOPs)</li> </ul>
Use seed, annual seedlings (transplants), or planting stock	<ul style="list-style-type: none"> <li>• Purchase receipts or other records documenting source &amp; treated/untreated status</li> <li>• Seed/planting stock: organic certificates OR commercial availability &amp; non-GMO records</li> <li>• Annual seedlings: organic certificates or on-farm production records</li> </ul>
Use crop input materials (fertilizers, pesticides, seed treatments, etc.)	<ul style="list-style-type: none"> <li>• Purchase receipts or other records documenting source</li> <li>• Application records (material name, date, rate, location)</li> <li>• Compost/compost tea/vermicompost produced by your operation: production records</li> <li>• Records to demonstrate compliance with any restrictions (e.g. nutrient testing, etc.)</li> </ul>
Have organic parcels with adjacent nonorganic production	<ul style="list-style-type: none"> <li>• Documentation of preventative measures to reduce drift risk</li> <li>• If growing crops in buffer zones: harvest and sales documentation verifying separation</li> </ul>
Responsible for harvest and/or transport	<ul style="list-style-type: none"> <li>• Harvest/transport equipment: cleaning records or SOPs</li> <li>• Harvest records or field tags (date, crop, quantity, location)</li> <li>• Transport or shipping records, if applicable</li> </ul>
Store crops	<ul style="list-style-type: none"> <li>• Storage records, organic certificates</li> <li>• Storage at your own facility: facility pest management records</li> </ul>
Simple post-harvest handling	<ul style="list-style-type: none"> <li>• Records of handling activities, including facility pest management and material use</li> </ul>
Send crops to another operation for handling/processing	<ul style="list-style-type: none"> <li>• Documentation of transactions (e.g. receiving, sales)</li> <li>• Organic certificate for handler/processor</li> </ul>
Source organic crops from another operation	<ul style="list-style-type: none"> <li>• Transaction and shipping/receiving records, organic certificates</li> <li>• If sourcing from uncertified (exempt) operation: records linking back to the last certified operation in the supply chain</li> </ul>
Sell or transfer ownership of organic crops (even if not sold as organic)	<ul style="list-style-type: none"> <li>• Shipping or sales records (e.g. BOLs, delivery or receiving records, grower statements, Farmers' Market load lists, contracted value for contract crop production, etc.)</li> </ul>
Export from Mexico to the US (my operation is the "Exporter of Record" responsible for shipments)	<ul style="list-style-type: none"> <li>• NOP Import Certificates (request prior to export: <a href="http://www.ccof.org/export">www.ccof.org/export</a>)</li> <li>• Records to demonstrate that exported products were not treated or exposed to a prohibited substance, fumigated with a prohibited substance, or exposed to ionizing radiation at any point in the product's movement across country borders.</li> </ul>



**B. Audit Trail**

An "audit trail" documents the **harvest** of organic crops (or purchase/acquisition from a certified organic supplier), any **storage** and/or **post-harvest handling**, and **transport** or **sale** of the crop to the buyer. A complete audit trail typically includes, but is not limited to the harvest, shipping, and/or sales records described above in section A.

Audit trail records must contain linking elements to trace organic products back to their source (your operation's organic field/parcel, or the certified organic supplier if sourced from another operation).

Audit trail records must identify crops/products as organic.

Your audit trail system must include the lot number, shipping identification, or other unique identification printed on nonretail containers as they move through the supply chain.

- 1) Attach a sample audit trail showing how you plan to meet the audit trail requirements above.
  - Highlight or clearly mark the linking elements to show how the documents connect in sequence.
  - Show how you will identify the organic status of the crop/product(s) on each type of document.
  - For nonretail containers that move through the supply chain (from your operation to the next operation): indicate where in your audit trail system the nonretail container's lot number, shipping identification, or other unique identification will appear.
  - **If you are new to organic production, you must provide an example of the audit trail records you plan to maintain.**

Sample audit trail attached.

- 2) Describe the lot numbering used to link to your audit trail and track organic crops/products once they leave your operation.

Not applicable, no lot numbering used.

My operation assigns lot numbers. Describe your lot numbering system:

EXAMPLE: Lot Number: 23123010				
Code	23	123	O	10
Signifies	Year: 2023	Julian date: harvest	Organic	Parcel ID

Lot Number:				
Code				
Signifies				

**C. Split Operation Record Keeping**

A **split operation** is an operation that produces or handles **both organic and nonorganic** products.

- 1) Mark all of the following that apply to your operation:
  - Grow both organic and nonorganic crops
  - Grow **identical** crops organically and nonorganically
  - Sell organic and nonorganic crops/products, including any that you source from other operations
  - Sell **identical** organic and nonorganic crops/products, including any that you source from other operations
  - None of the above. Skip to section D.
- 2) How do your input records distinguish between materials used on organic and nonorganic crops?

- 3) How do your harvest, shipping, and sales records distinguish between organic and nonorganic crops/products?



## D. Monitoring & Fraud Prevention

*Organic fraud is the deceptive representation, sale, or labeling of nonorganic agricultural products as organic.*

*You must implement practices and procedures to effectively monitor and verify the organic status of crops/products you produce or source, to prevent organic fraud. The scale and scope of your fraud prevention plan should reflect the complexity of your activities. See our [Fraud Prevention Plan worksheet](#) for more details. CCOF may request that you complete Handler OSP forms and/or a [Fraud Prevention Plan worksheet](#) if indicated by the complexity of your activities.*

4) Mark all of the following that apply:

- My operation purchases certified organic seed, annual seedlings (transplants), and/or planting stock (including spawn or ready-to-use blocks for mushroom production).

*Describe activities in [G3.0 Seeds & Planting Stock](#) (or [G3.2 Mushroom Production](#)).*

- My operation sources certified organic crops or products (e.g. for CSA or Farmers Market, for other distribution or re-sale by your operation).

*Describe activities in [G6.5 Sourcing & Direct Marketing](#).*

- My operation sends certified organic crops to another operation for storage, handling, or processing (prior to sale of the crop or value-added product).

*Describe activities in [G6.1 Harvest & Transport](#) and/or [G6.2 Storage](#).*

- My operation packs into brands/labels owned by other certified operations.

*Describe activities in [G7.0 Labeling](#).*

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

5) For each of the scenarios you indicated in question 1, how do you verify current organic status?

*Certificates must be current (issued within the last 15 months) and complete (listing the product sourced or produced/handled, with brand, if any). Records must link back to the last certified organic operation.*

- Current organic certificate reviewed with each shipment or transaction.

- Certificate reviewed periodically, indicate frequency:  Monthly  Quarterly  Annually

- Other (describe): \_\_\_\_\_

6) How do you monitor the effectiveness of your certificate verification practices and procedures?

*Should you suspect organic fraud please visit: [www.ccof.org/faq/#how-do-i-address-organic-complaints-and-problems-in-the-marketplace](http://www.ccof.org/faq/#how-do-i-address-organic-complaints-and-problems-in-the-marketplace).*

- Standard procedure requires sign-off from more than one employee for each transaction

- Periodic review of records for quality control

- Other, describe: \_\_\_\_\_