



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.**

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





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: 23123O10				
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.

1) 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.

2) 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): _____

3) 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.

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

Periodic review of records for quality control

Other, describe: _____

