Organic Handler Inspection Preparation Checklist

Thorough preparation leads to an efficient inspection and saves you money on the inspection bill. Please check each item below carefully and have all applicable requested records available. Your Inspector may request additional records as needed, per NOP §205.103.

Please see the cancellation policy below*

✓ **Review and update your Organic System Plan (OSP)**

The OSP is the central document of organic certification. It must be accurate and current. Minor updates can be made directly on the existing version. For significant updates or changes, you can start from scratch for any individual section. Visit Resources to find OSP forms and reference the Handler OSP Update Guide. **Be sure to have access to your OSP and copies of updated OSP forms at inspection.** You can access your current, approved OSP in MyCCOF.

✓ **Review Compliance Reports from CCOF**

Your inspector will review the status of all issues or reminders. If you ever wonder what is due to CCOF and why, log in online to MyCCOF and check your most recent Compliance Report. In MyCCOF's Action Item Tracker, you can respond to requests and produce a compliance report at any time.

✓ **Certification Standards**

Certification requirements are based on the standards and policies in CCOF Certification Manuals.

✓ **Supplier List**

- Email your inspector your current supplier list (H2.0A or H2.6) at least one week before the inspection. Highlight new suppliers in yellow and removed suppliers in blue, following the key in the Excel sheet. For any new suppliers with brands or products not listed in the operation's OID profile, provide current certificates, including product addendums.
- Your inspector will review these materials in preparation for the inspection. Be prepared to demonstrate how you verify a new or existing supplier is compliant before you source from them. Not sending your supplier list at least one week before your inspection may result in a higher cost inspection due to the additional time spent onsite to review.

✓ **Products**

- Review your Certificate Client Profile addendum in MyCCOF, H2.0 Organic Products or H2.5 Brokered Products, H2.0B Product Formulations (if applicable), and OSP Materials List. Are they current regarding organic products you produce, co-packers/storage facilities you work with, and nonorganic processing aids or ingredients?
- Labels: Are all currently used labels in your OSP, including nonretail labels used for shipping or storage? Send any updated labels to CCOF for review. Using new labels without CCOF preapproval may result in noncompliance and reprinting.

This guideline is intended to assist operators prepare for an efficient organic inspection. This is not a comprehensive list. Records requested for review will vary by circumstance.

***Please note:** If an inspection is cancelled by the operation within **5 or less business days** before the confirmed scheduled date, or the client fails to appear for a scheduled inspection, CCOF CS charges for **all time and expenses** (Including travel related expenses) incurred by the inspector after initial contact regarding scheduling, plus a $100 penalty. Additionally, at the second request to schedule an inspection, the client has 5 business days to respond or else CCOF CS may bill a $50 penalty. Annual inspections are efficiently planned to minimize travel costs. Cancellation may result in a costlier inspection for your operation at a later time and impact expenses shared by your organic neighbors initially scheduled with you.

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- Organic certificates for co-packers and certified private label brand owners: Are they all current (issue date within one year prior to purchasing) and do they list the products you produce?
- New products: Complete the Product Application and send labels for any new products (brokers update H2.6 and do not send labels); also send an H2.0B Product Formulation for any new multi-ingredient organic product you wish to process. All new products must be reviewed by CCOF before production begins. **Your inspection cannot include a review of new products that were not already approved by CCOF.** Production of products without preapproval by CCOF will result in Noncompliance and may require products to be relabeled as nonorganic.

✓ **Organic Facility**

- Are there any new facilities? Submit new H2.3 Organic Facility, H4.0 Organic Practices, H5.0 Record Keeping for Handlers, and Organic Fraud Prevention Plan forms to CCOF. Your inspector cannot inspect any new facility unless it is already preapproved by CCOF.
- Are there any changes to equipment, flow chart, processes? New equipment must be approved by CCOF prior to inspection.

✓ **Organic Practices (H4.0 and OSP Materials List)**

- Are descriptions of receiving, storage, packaging, and shipping practices current?
- Are all wash water additives included on your OSP Materials List and described on your H4.0?
- Are all equipment cleaners and sanitizers included on your OSP Materials List as Generic listings and described on your H4.0?
- If National List pesticides are used in food storage or handling areas, are they included on your OSP Materials List as Generic listings and described on your H4.0?
- If non-National List pesticides are applied in food storage or handling areas, are they included on your OSP Materials List as Generic listings, and do you have justification for usage?

✓ **Product Tracking Records (H5.0, Audit Trail Traceback)**

Your inspector will choose at least one product to track from sales back to ingredients, testing for traceability. Think of this like a mock product recall. Audit trail documentation must be maintained to facilitate supply chain traceability, including identification of products as organic on documents. Please note that your inspector must choose the sample while on site. A typical audit trail includes records such as:

- Final Product Documents: orders, shipping documents, sales invoices.
- Processing Records: batch sheets, packing records, fermentation records, case counts.
- Ingredients/Receiving: purchase invoices, organic certificates, shipping and receiving documents.
- Uncertified Operations: Audit trail documentation must be traceable back to the last certified operation and must identify (link to) the last certified operation, even if product passes through uncertified handlers such as transporters or storage facilities. Audit trail documentation must include documents generated by the last certified operation proving purchase, delivery, and/or transfer.

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- Import documents (if you are the Importer of Record): NOP Import Certificates, Import Permits, US customs entry documents (ex: CBP 7501 and 3461). If issued for your shipments: USDA APHIS Inspection certificates, Phytosanitary certificates, Certificates of Origin, shipping manifests, marine surveyor reports, exporter BOLs, domestic BOLs, and results from any and all residue, GMO, quality, or other analytical testing performed by anyone in the supply chain.
- If you export from Canada or Mexico to the US, have your NOP Import Certificate tracking logs available.

✓ **In/Out Mass Balance Audit:** This required inspection step is used to assess whether Sales amounts balance with Incoming Products and Ingredients. Your inspector will choose at least one organic product over a given time period to audit. Depending on the product, this may require ending and starting inventories. Please have sales, purchases, production, loss, and inventory records available.

✓ **Exempt Uncertified Suppliers:** If you source organic ingredients from exempt uncertified brokers, traders, wholesalers, or distributors, your inspector will choose at least one shipment from each uncertified supplier to see if records directly link back to a certified supplier. Organic ingredients sourced from an exempt uncertified supplier must be sealed in tamper-evident final retail packaging. Refer to the Exempt Handler Affidavit for records that must be available for each delivery.

✓ **Organic Fraud Prevention Plan:** Your OSP must describe monitoring practices and procedures to prevent organic fraud, as appropriate to your operation's activities, scope, and complexity. Be prepared to discuss your plan with your inspector. Refer to CCOF's OFPP for elements that may be part of your OFPP.

✓ **Verification of your total annual Organic Production Value:** Your inspector will need the gross organic sales for the previous calendar year and the purchase cost of the organic ingredients that went into those sales. The total organic sales, minus the purchase cost of organic ingredients and service fees charged by certified organic co-processors, is the amount on which your annual fee is based. If you provide a value-added service, the production value is based on the total revenue for the service you provide with regard to that specific organic product. Additional details on calculating your Organic Production Value can be found in the CCOF Certification Services Manual at www.ccof.org.

Thank you for your effort!

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