

## NOP§ 205.103

**RECORD KEEPING** 

Page 1 of 2

OSP

Date:

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

## **Operation Name:**

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 be sufficient to demonstrate compliance with organic regulations, kept for at least five (5) 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:

If you do this:	Maintain this type of record:
Grow crops	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
	<ul> <li>Production equipment also used for nonorganic: cleaning records or Standard Operating Procedures (SOPs)</li> </ul>
Use seed, annual seedlings	Purchase receipts or other records documenting source & treated/untreated status
(transplants), or planting stock	Nonorganic seed/planting stock: commercial availability records, non-GMO verification
	Annual seedlings: organic certificates or on-farm production records
Use crop input materials (fertilizers,	Purchase receipts or other records documenting source
pesticides, etc.)	Application records (material name, date, rate, location)
	Compost/compost tea/vermicompost produced by your operation: production records
Have organic parcels with adjacent	Documentation of preventative measures to reduce drift risk
nonorganic production	• If growing crops in buffer zones: harvest and sales documentation verifying separation
Responsible for harvest and/or	Harvest/transport equipment also used for nonorganic: cleaning records or SOPs
transport	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 organic crops from another	Transaction and shipping/receiving records
operation	Organic certificates for suppliers
Sell organic crops (even if not represented as organic)	<ul> <li>Shipping or sales records (e.g. BOLs, delivery receipts, receiving documents, grower statements, Farmers' Market load lists, produce stand inventory lists, etc.)</li> </ul>

## 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 organic product and is sufficient to trace organic crops 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 organic production and do not have existing 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

NOPB33, V1, R9, 9/21/2021

Page 1 of 2

≁Cert	ified						
	NOP§ 2	05.103			RECORD KEEPING	OSP SECTION:	G8.0
	Find al	II forms at <u>ww</u>	/w.ccof.org/documen	<u>ts</u> . Send completed forn	ns to <u>inbox@ccof.org</u> .		Page 2 of 2
<ul> <li>2) How do your audit trail records link to track organic crops from the source (field/growing location, or supplier) to the all that apply.</li> <li>☐ Field numbers or names</li> <li>☐ Farm name, if the operation is all organic with only one field</li> <li>☐ Julian date cod</li> </ul>							ale? Mark
	Lot numbers	(describe lot	numbering system):				
	Other (descr	ibe):					
<b>C.</b> <i>A s</i> 1) 2)	Mark all of the f Grow both o Grow identi Sell organic Sell identica None of the	an operation ollowing that a rganic and not cal crops orga and nonorgan al organic and above. Stop, t	that <b>produces or han</b> apply to your operation norganic crops unically and nonorganic ic crops/products, inclu nonorganic crops/prod his form is complete.	ally uding any that you source	from other operations ou source from other operatic	ins	
3)	How do your ha	arvest, shipping	g, and sales records di	stinguish between organio	c and nonorganic crops/produ	icts?	
4)	Sourcing from u	<i>uncertified han</i> is form is com	dlers requires addition olete. 🗌 Yes, attach	an Uncertified Handler	s, or distributors? <i>inspection and will incur add</i> <u>Affidavit</u> (UHA) for each unco d handler? Check all that app	ertified supplie	

Your OSP must list all certified suppliers, including products sourced through uncertified handlers. Audit trail records must lin
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	y delivery that cannot be traced back to	the certified supplier, re	fuse or hold shipment until t	he certified supplier is
verified	d.			
Other (	(describe):			