



## Handler Organic System Plan

Status:  
Contact:  
Subject:  
Date:  
Type: 2016

Comments

Use this form to describe your operation. If a question does not apply, indicate "none" or "N/A" if not applicable.

Your organic management plan includes this form and required additional information as indicated throughout the form. Any alternative forms of providing organic plan information should be indicated in related section(s) of this form. Pay particular attention to italicized directions which require additional action or documentation.

### GENERAL INFORMATION NOS §205.406(a)

1. If you are a contract operator for on-farm processing, contract feed processing, or contract meat processing, provide the name of your customer (MOSA certified client). Note NA if not applicable.

2. If organic processing will occur at any additional facilities, provide facility locations and describe their role. Depending upon the additional facilities' products and services provided, additional information and fees may be required.

3. Identify all programs for which you are requesting certification and/or verification. (Additional fees may apply for additional verifications.)

US-EU Organic Equivalence Arrangement     US-Japan Organic Equivalence Arrangement  
 US Taiwan Export Arrangement     US-Canada Organic Equivalence Arrangement     Other

4. If you selected any programs in the previous question, list the products.

5. How do you verify that ingredients and other inputs used meet international or other additional verification requirements (e.g. certificates showing international compliance, full composition information)?

6. Describe government permits/licenses/inspections that are in effect for your operation. Certified organic handlers must comply with all applicable Federal, State, and local regulations.

#### 7. CERTIFICATION REQUEST OVERVIEW:

Give a brief description of your process/handling experience, and reason(s) for choosing organic management practices.

8. In general, what types of organic products are produced and/or organic services are provided by your company? If organic production has not yet begun provide your best estimate.

9. Provide your total estimated annual production in units and/or services provided, **and** provide the anticipated percentage that is organic?

10. List (or submit a list) of all products and/or services requested for organic certification.

11. **CONTRACT HANDLERS:** Contract handlers who receive organic product packaged or otherwise enclosed in a container, and do not repackage or otherwise process the product do not need to be certified. However, such handlers must complete and submit the **Excluded Handler** form. Contract handlers who provide other types of handling or processing services to your company do need to be certified organic.

Provide the name, phone number, certification agency and process/handling service provided for each contract handler used. Have a current copy of the handler's certificate at inspection.

**Question(s) not listed are for office use only.**

## ORGANIC PRODUCT COMPOSITION NOS §§205.105, .301 .302

The National Organic Standards require that all raw or processed agricultural products sold, labeled or represented as "100 percent organic," "organic" or "made with organic (specified ingredients or food group(s))," and all organic ingredients in multi-ingredient agricultural products with less than 70% organically produced ingredients must be handled in compliance with all applicable organic standards. For processed products labeled as "organic" on the principal display panel, all agricultural ingredients must be certified organic or on the National List. Nonorganic ingredients and processing aids used must be allowed on the National List and must not comprise more than 5% of the finished product (excluding water and salt). All annotations and restrictions for ingredients used from the National List must be followed, and commercial unavailability documented when applicable. Products making "100% organic," "organic" or "made with..." claims may not contain ingredients or processing aids subject to ionizing radiation or genetically engineered organisms and their derivatives, nor ingredients produced using sewage sludge. National Organic Standard §205.301 outlines other label-claim-specific and product composition requirements. National Organic Standard §205.2 defines an ingredient as any substance used in the preparation of an agricultural product that is still present in the final commercial product as consumed.

14. **INGREDIENTS:** Submit completed **Organic Product Profiles** for all organic products requested for certification. Ingredient labels and/or specification sheets, as applicable, must also be provided for all ingredients.

What is your procedure for sourcing organic agricultural ingredients?

15. How do you verify certification of organic ingredients?

16. How do you verify that ingredients and other inputs used have not been produced using genetic engineering, sewage sludge, or ionizing radiation and that National List annotations are followed?

17. Do any nonorganic ingredients used have annotations/restrictions for their use on the National List?

Yes  No

18. If "yes," describe how you meet compliance. If you are uncertain about how to meet these requirements, please contact MOSA.

19. **PROCESSING AIDS:** Reference the definition of Processing Aid in NOS §205.2. Processing aids must be noted on the **Organic Product Profile** submitted for each product requested for certification. Submit processing aid labels and/or specification sheets, as applicable.

Do you use processing aids? If no processing aids are used, skip to the Contact Substances Section.

Yes  No

20. If "yes," list what processing aids are used, and describe how and why they are used.

21. If any processing aids used have annotations/restrictions for their use on the National List, describe compliance.

22. Are any processing aids **not** on the National List? If "yes," explain.

23. Check if any processing aids have been produced, processed with or exposed to the following. Check all that apply.

ionizing radiation  sewage sludge  genetic engineering  none of these

24. If "none," do you have verification?

Yes  No

25. **CONTACT SUBSTANCES:** Contact substances are defined by the FDA as "any substance intended for use as a component of materials used in manufacturing, packing, packaging, transporting, or holding food if such use is not intended to have a technical effect in such food." Note contact substances on the **Handler Input Inventory**.

Are any contact substances used during organic or nonorganic processing?

Yes  No

26. Any contact substances must have documentation to show that they meet the FDA definition. How is this documentation provided to MOSA?

27. **WATER:** Water used in processing/handling must meet potable water standards. For products that use culinary steam, boiler additives must not contaminate the organic products. List boiler additives on the **Handler Input Inventory** and submit product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA.

How is water used in processing? *Check all that apply.*

not used    ingredient    processing aid    cooking    cooling    product transport    organic product cleaning  
 equipment cleaning    other

28. *If "other," explain.*

29. *List all sources of water (e.g. municipal, on-site well). Submit a **water test** for Coliform bacteria and nitrates for nonmunicipal water sources.*

30. *List any known water contaminants.*

31. *What on-site water treatment processes are used? (e.g. filtration (specify type), chlorination (specify where used), softening.)*

32. Do you use water conservation strategies?

Yes    No

33. *How, and how often, do you monitor water quality?*

34. Is culinary steam used in the processing of organic products?

Yes    No

35. Which of the following are used to ensure boiler additives are not a contamination threat?

steam filters    condensate traps    testing of condensate    testing of finished products    other

36. *If "other," explain.*

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**ORGANIC MANUFACTURING AND HANDLING PRACTICES (product flow, sanitation) NOS §§205.201, .272**

Procedures, processes, storage and equipment must prevent risk of commingling organic and nonorganic products, and prevent contamination from prohibited substances present in the facility. Procedures used to maintain organic integrity must be documented. Organic Control Points (OCPs) are areas in the production system where organic integrity may be compromised. Your organic system plan must determine where contamination is most likely to occur and show how contamination will be prevented.

**39. PRODUCT FLOW:**

*Provide a written description below showing how and where ingredients/products are received, stored, processed, packaged, and warehoused, and identifying all equipment used, storage areas, and where ingredients are added or processing aids used. Include OCPs in the product flow description. A schematic product flow chart may be submitted to provide this information. If you have a formal OCP plan that contains information beyond what we ask here, please submit that plan.*

**40. EQUIPMENT:** *To prevent commingling and contamination, all equipment used in organic production or handling must be free of nonorganic product and prohibited materials. Equipment used for both organic and nonorganic processing or handling must be cleaned and/or flushed prior to use on organic products. Keep records of cleaning and flushing activities. Submit facility **map(s)** showing equipment location and areas used for organic processing, packaging, or storage.*

*Describe cleaning methods for equipment used in processing (including sweeping, scraping, vacuuming, compressed air, manual washing, clean in place (CIP), steam cleaning, sanitizing) used prior to organic production runs (or submit SSOPs if desired). Products used for equipment cleaning and sanitation must be listed on the **Handler Input Inventory**. Submit product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA.*

41. *Describe purge procedures, quantities purged, and purging documentation. If no equipment purging is done, note "N/A".*

42. Are all surfaces that contact organic products food grade?

Yes    No

43. If "no," explain.

44. **GENERAL SANITATION:** Good sanitation practices must be used throughout the facility. Residues from cleaning materials must not contaminate organic products. List all cleansers and sanitizers used in the processing facility on the **Handler Input Inventory** and submit product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA.

How is sanitation handled?

in-house  by outside contractor  both

45. Provide the name of your in-house sanitation officer or contract cleaning service, and their contact information including address and phone number.

46. Describe general facility sanitation methods used prior to organic production runs (or attach SSOPs if applicable).

47. Are any cleansers/sanitizers listed as restricted or prohibited by the National List? List inputs on the **Handler Input Inventory**.

Yes  No

48. What measures are in place to ensure that the residues of cleanser/sanitizers and/or nonorganic food matter do not remain on processing equipment and/or containers when organic processing occurs? Check all that apply.

ph testing of rinsate  residue testing on food contact surfaces  other  
 use sanitizer with ingredients on the National List  purge/flush  mechanical cleaning

49. If "other," explain.

50. If testing is done, describe the type of test(s) and sensitivity level(s) of testing materials.

51. How, and how often, is general sanitation monitored?

52. Where are cleaning/sanitizing materials stored?

53. What methods are used to maintain employee hygiene?

**Question(s) not listed are for office use only.**

### ORGANIC MANUFACTURING AND HANDLING PRACTICES (transport) NOS §§205.201, .272

56. **INCOMING TRANSPORT:**

In what forms are incoming products received? Check all that apply.

dry bulk  liquid bulk  tote bags  tote boxes  metal drums  cardboard drums  paper bags  
 foil bags  pails  other

57. If "other," explain.

58. How are incoming products transported?

tanker  trailer  common carrier  rail  self  other

59. If "other," explain.

60. Who arranges incoming product transportation?

61. How do you ensure that incoming transport units were cleaned prior to loading organic products?

62. Is this inspection/cleaning process documented?

Yes  No

63. Are incoming transport units used to carry any prohibited substances?

Yes  No

64. Have transport companies been notified of organic handling requirements?

Yes  No

65. Are organic products shipped at the same time as nonorganic in the same transport units?

Yes  No

66. What steps are taken to segregate organic products? *Check all that apply.*

dedicated organic only  pallets  pallet tags  organic product shrink-wrapped  separate area in transport unit  
 other

67. If "other," explain.

**68. IN-PROCESS TRANSPORT:**

How are in-process products transported?

69. How do you ensure that in-process transport units are cleaned prior to loading organic products?

70. Is this inspection/cleaning process documented?

Yes  No

**71. OUTGOING FINISHED PRODUCT TRANSPORT:**

In what form are finished products shipped?

dry bulk  liquid bulk  tote bags  tote boxes  paper bags  foil bags  metal drums  mesh bags  
 cardboard drums  cardboard cases  plastic crates  other

72. If "other," explain.

73. How are outgoing products transported?

tanker  trailer  common carrier  rail  self  other

74. If "other," explain.

75. Who arranges outgoing product transportation?

76. How do you ensure that outgoing transport units are clean prior to loading organic products?

77. Is this inspection/cleaning process documented?

Yes  No

78. Are outgoing transport units used to carry any prohibited materials?

Yes  No

79. Have transport companies been notified of organic handling requirements?

Yes  No

80. Are organic products shipped at the same time as nonorganic in the same transport units?

Yes  No

81. What steps are taken to segregate organic products? *Check all that apply.*

dedicated organic only  pallets  pallet tags  organic product shrink-wrapped  separate area in transport unit  
 other

82. If "other," explain.

**Question(s) not listed are for office use only.**

**ORGANIC MANUFACTURING AND HANDLING (storage, quality assurance) NOS §§205.201, .272**

**STORAGE INFORMATION:** Provide information for storage areas. Off-site storage facilities must be certified organic, or excluded from certification. A storage facility that receives organic packaged product or otherwise enclosed in a container, and does not repackage or otherwise process the product does not need to be certified. Contact MOSA to determine if storage qualifies for exclusion. The **Excluded Handler** form must be completed for such facilities. Storage areas must be indicated on facility **map(s)**.

List all storage areas in the table below.

Please verify the lines below. Use the table to add new items. If there isn't enough room, attach a separate list with the same column layout.

**Handler storage information**

Use	Location	Type of storage	Capacity	For organic use only?	How is contamination prevented in this area?
Off-site					


Additional Comments

86. List products stored off-site, and contact information for off-site storage location.

87. **WASTE MANAGEMENT PLAN:** Waste products sold as organic must be certified. Some examples of waste products include whey from cheese making, grain cleanings from seed conditioning, meal from oilseed processing, or water used in processing or cleaning.

Will any waste products from certified organic ingredients be sold as certified organic? *If "yes," submit an **Organic Product Profile** for each product.*

Yes  No

88. How do you manage waste from processing? *Check all that apply.*

on-site dumpster  material recycling  water recycling  water filtering  smokestack filters  composting  
 daily pickup of waste  sediment ponds  application to organic land  application to nonorganic land  other

89. If "other," explain.

90. Do you have records on your waste volume?

Yes  No

91. **EDUCATION AND TRAINING:** All personnel should receive appropriate training to maintain food safety and organic integrity.

How many people are employed at your organic production facility(s)?

92. Describe procedures ensuring personnel have appropriate training in organic handling practices and general food handling/protection.

93. Is this training documented?

Yes  No

94. **QUALITY ASSURANCE:**

Do you have a QA program in place? If so, which program do you use (HACCP, HARPC, TQM, etc.)?

95. Are any outside quality assessment services used? If so, list name of assessment company.

96. Indicate type(s) of product testing used. *Check all that apply.*

ingredients prior to purchase  finished product  product during production  ingredients upon receipt  none

97. Are ingredient samples retained? If so, for how long?

98. Are finished product samples retained? If so, for how long?

99. Indicate any other means to monitor product quality and/or the effectiveness of your organic management plan.

100. Describe product recall system, or attach product recall plan.

101. Do you anticipate any changes to your quality assurance system? If yes, describe.

102. Specify any type(s) of environmental testing conducted.

**103. ADDITIONAL PRECAUTIONS:**

Are any other means not described above taken to ensure that organic integrity is maintained?

Yes  No

104. If "yes," list organic compliance plans and organic integrity protection methods.

**Question(s) not listed are for office use only.**

**PEST MANAGEMENT NOS §§205.201, .271, .272**

The National Organic Standards require that pest management is primarily handled by preventive methods as noted in NOS §205.271. When these are not effective, non-synthetic or synthetic substances allowed for organic processing and handling may be used. If prevention and allowed materials are not effective, any substance may be used for pest management, provided it is used in compliance with legal restrictions, and provided the operator and MOSA agree on the substance used, methods of application, and measures taken to maintain organic integrity. Substances must be applied in a manner that prevents contamination of ingredients or finished products to be sold, labeled or represented as organic. All treatments used must be justified. A pest management plan must be in place for each facility operated, and a program of regular preventive monitoring must be a part of this plan to show that a previously allowed material is still needed.

**107. GENERAL INFORMATION:**

How is pest control handled?

in-house  outside contractor  both

108. Provide the name of your in-house pest control officer or contract pest control service, and their contact information including address and phone number.

109. What pest problems do you generally have? Check all that apply.

flying insects  crawling insects  spiders  birds  rats  mice  other

110. If "other," explain.

111. **PEST MANAGEMENT PRACTICES:** Submit a facility **map** showing the location of traps and monitors. List all pest control products on the **Handler Input Inventory**. Submit product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA.

Check all pest management practices used. Check all that apply.

good sanitation  removal of exterior habitat/food sources  cleanup of spilled product  
 sealed doors and/or windows  exclusion  repair of holes, cracks, etc.  screened windows, vents, etc.  
 sheet metal on sides of building exterior  physical barriers  mowing  air curtains  air showers  
 positive air pressure in facility  monitoring  ingredient inspection for pests  
 inspection zones around interior perimeter  ultrasound/light devices  sticky traps  beneficials/natural predators  
 electrocutors  pheromone traps  mechanical traps  scare eye balloons  nitrogen  freezing treatments  
 heat treatments  vacuum treatments  carbon dioxide  vitamin baits  pyrethrum  ryania  rotenone  
 boric acid  disodium octaltetrahydrate  diatomaceous earth  precipitated silica  fumigation  fogging  
 crack and crevice spray  other

112. If "other," explain.

<p>113. Are your pest prevention methods and structural pest management system effective to prevent or control pests?  <input type="checkbox"/> Yes   <input type="checkbox"/> No</p>
<p>114. If "no," explain.</p>
<p>115. Are records kept of your monitoring activities?  <input type="checkbox"/> Yes   <input type="checkbox"/> No</p>
<p>116. How often do you inspect your pest prevention system?</p>
<p>117. What changes do you anticipate to your pest management system?</p>
<p>118. <b>PESTICIDE USE:</b> List all pest control substances including baits, sprays, pesticides, or fumigants on the <b>Handler Input Inventory</b>. Submit product labels and ingredient information for inputs not OMRI listed or previously approved by MOSA.</p> <p>Are pesticides used? If "no," skip to Audit Trail and Inventory Control System Section.  <input type="checkbox"/> Yes   <input type="checkbox"/> No</p>
<p>119. Are any products used which are prohibited by the National List?  <input type="checkbox"/> Yes   <input type="checkbox"/> No</p>
<p>120. If "yes," did you contact MOSA for approval prior to product use?  <input type="checkbox"/> Yes   <input type="checkbox"/> No</p>
<p>121. Indicate type of pesticide application records maintained.</p>
<p>122. Describe methods to prevent pesticide contamination of organic ingredients, finished products, or packaging materials.</p>
<p>123. Describe measures to reduce or prevent pest control product use in the future.</p>
<p>124. Where are pest control substances stored?</p>
<p><b>Question(s) not listed are for office use only.</b></p>
<p><b>AUDIT TRAIL AND INVENTORY CONTROL SYSTEM NOS §§205.103, .201</b>  Audit trail and inventory control procedures must be adequate to trace all ingredients and products from the supplier(s) through the entire handling system, including packaging and storage, and on through distribution, sales and transport, using lot numbers, date codes, or a similar product tracking system. Organic handlers must retain valid proof of certification for all organic ingredients. Amounts of organic finished products must balance with purchased certified organic and other allowed ingredients (loss to shrinkage or spoilage should be documented). All relevant documents should identify products as "organic". Documents in your audit trail must be able to link to those preceding and following them in the record system. If lot numbers and/or other identification codes on documents change as products move through your operation, documents must remain auditable so product is traceable.</p>
<p>127. What documents do you use to track ingredients and products at <b>receiving</b>? Check all that apply. Please have all records identified in this section available at inspection. Submit sample records needed to show traceability.  <input type="checkbox"/> purchase orders   <input type="checkbox"/> bills of lading   <input type="checkbox"/> certificates of analysis   <input type="checkbox"/> receiving records   <input type="checkbox"/> customs forms  <input type="checkbox"/> transaction certificates   <input type="checkbox"/> receiving summary log   <input type="checkbox"/> invoices   <input type="checkbox"/> organic certificates   <input type="checkbox"/> receipts  <input type="checkbox"/> quality test results   <input type="checkbox"/> scale tickets   <input type="checkbox"/> other</p>
<p>128. If "other," explain.</p>
<p>129. What documents do you use to track ingredients and products while <b>in process</b>? Check all that apply.  <input type="checkbox"/> sanitation logs   <input type="checkbox"/> production summary logs   <input type="checkbox"/> blending reports   <input type="checkbox"/> packaging reports   <input type="checkbox"/> production reports  <input type="checkbox"/> ingredient inspection forms   <input type="checkbox"/> quality assurance reports   <input type="checkbox"/> equipment cleaning logs   <input type="checkbox"/> other</p>
<p>130. If "other," explain.</p>
<p>131. What documents do you use to track ingredients and products while in <b>storage</b>? Check all that apply.  <input type="checkbox"/> ingredient inventory report   <input type="checkbox"/> finished product inventory reports   <input type="checkbox"/> other</p>



132. If "other," explain.

133. What documents do you use to track ingredients and products at **shipping**? Check all that apply.

shipping logs  sales receipts  other

134. If "other," explain.

135. Describe your lot numbering system.

136. Describe how lot numbers and/or other specific identification used link documents to enable traceability.

137. What other types of records do you maintain? Check all that apply.

ingredient verifications  input labels/composition list  equipment cleaning records  labor records  
 pest control log  documentation showing lack of commercial availability  residue tests  other

138. If "residue tests" or "other," explain.

139. Can your recordkeeping system track the finished product in the marketplace back to all ingredients?

Yes  No

140. Can your recordkeeping system balance organic product in and organic product out?

Yes  No

141. Can your recordkeeping system verify prevention of contact with prohibited substances?

Yes  No

142. If you answered no to any of the above three questions, what changes will you make to ensure these areas can be tracked/verified?

143. The National Organic Standards require that you keep a copy of all certification documents for a minimum of 5 years. How do you intend to maintain these records?

hard copy  electronically  both

**Question(s) not listed are for office use only.**

### **PACKAGING AND LABELING NOS §§205.201, .272, .303 - .311**

The National Organic Standards require that packaging materials be free of prohibited substances and must not contaminate the organic product. Organic product labels must meet State and Federal labeling requirements as well as requirements specifically outlined in NOS §205.303-.311. All labels making an organic claim must be approved prior to use. Submit color labels if colored labeling is used. Production lot numbers are required on non-retail containers, used to ship or store organic products. For products labeled as "100% organic," "organic," "made with organic (specified ingredients or food group(s))," or livestock feed products, the certified handler or product distributor must be identified on the information panel, followed below by "Certified Organic by MOSA." Organic ingredients must be identified as organic in ingredient listings on products labeled "100% organic," "organic" or "made with organic (specified ingredients or food group(s))." See the NOS for complete labeling requirements/options and contact MOSA as needed for clarification.

#### **146. PACKAGING:**

What types of packaging material are used? Check all that apply.

bulk  paper  cardboard  wood  glass  metal  foil  plastic  waxed paper  aseptic  
 natural fiber  synthetic fiber  other

147. If "other," explain.

148. Are all packaging materials food grade?

Yes  No

149. Where are packaging materials stored?

150. Have any packaging materials been exposed to fungicides, preservatives, fumigants or pest control materials (in storage, contained in material, or otherwise)? If so, describe exposure, including name of products used.

151. Are packaging materials reused? If so, describe how these are cleaned prior to use. All recycled packaging materials must be thoroughly cleaned prior to use and pose no risk to organic integrity.

152. What changes do you anticipate in your packaging?

153. **LABELING:** All labels making an organic claim must be approved by MOSA prior to use. Submit copies of new labels and label changes to MOSA for review and approval. Submit color labels if colored labeling is used.

Do you use or plan to use labels that make an organic claim?

Yes  No

154. If you make/use labels for organic products, describe the type of labels used (retail, non-retail, etc.). Note N/A if not applicable.

155. Describe your system for verifying that all labels making an organic claim comply with the National Organic Standards. Note N/A if not applicable.

156. Do you use or plan to use the USDA seal and/or the MOSA logo on product labels or marketing information?

Yes  No

157. **PRIVATE LABELING:** Private label arrangement authorization is required if MOSA is listed as the certifier on the label and the company on the label is not MOSA certified. Private label arrangement authorization requires an administrative fee and submission of the **Private Label Arrangement** form.

Do you have any private labeling plans?

Yes  No

158. If "yes," list what company(s) will be displayed on the label(s), and what certifier(s) will be displayed on the label(s). All labels making an organic claim must be submitted to MOSA and approved prior to use. Submit color labels if colored labeling is used.

159. **COMPLETE:** Is your Organic System Plan complete?

Yes  No

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SAMPLE ONLY  
DO NOT COMPLETE