



Handler Organic System Plan

Use this form to describe your operation. If a question does not apply, indicate "none" or "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.

Status:
Contact:
Subject:
Date:
Type:

Comments

GENERAL INFORMATION NOS §205.406(a)

1. *If this is an on-farm processing, contract feed mill, or contract meat processor facility that will be included on a MOSA producer's certificate, provide the producer's name.*

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, describe the products.*

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

6. *When do you anticipate having your operation ready for inspection?*

7. Describe your contact and inspection timing preferences:

- Contact - Morning Contact - Afternoon Contact - Evening Inspect - Morning Inspect - Afternoon
- Inspect - Evening

8. *If you are currently certified by another agency, provide agency name:*

Attach a copy of your last certification letter from that agency. When available, provide a copy of prior noncompliance notifications or certification denials, and describe and provide evidence of actions taken to correct the noncompliance issues.

9. *If you intend to certify with another agency this year, provide agency name:*

10. *If you have ever been inspected or certified by another agency, provide agency name:*

Attach a copy of your last certification letter from that agency. When available, provide a copy of prior noncompliance notifications or certification denials, and describe and provide evidence of actions taken to correct the noncompliance issues.

11. 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.

12. Check here if you are a new certification applicant:
 New certification applicant

13. If you are an updating client, refer to your most recent Certification Determination Letter. Did it outline any conditions/requirement for continued certification?
 Yes No

14. If conditions were outlined in your most recent Certification Determination letter, explain what they were and how they were (or will be) addressed.

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

16. In general, what types of organic products are produced and/or organic services are provided by your company?

17. Describe estimated annual total production and/or services provided, and percent that is organic.

18. List or attach a list of all products and/or services requested for organic certification:

19. What additions or changes have you made to your organic plan since the last time this form was submitted? What changes do you anticipate making in your product and/or service line this year?

20. 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. Contract handlers who provide other types of handling/processing services to your company do need to be certified.

Provide the name, phone number, certification agency and process/ handling service provided for each contract handler used:

Organic Product Composition §205.105, .301 .302

The NOS 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, you need to show efforts to obtain certified organic ingredients whenever possible. Non-organic ingredients and processing aids used must be allowed on the National List and must not comprise more than 5% of the total of the finished product (excluding water and salt). 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. NOS §205.301 outlines other label-claim-specific product composition requirements.

Reference the definition of Ingredient in NOS §205.2.

Attach 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.

21. INGREDIENTS

What is your procedure for sourcing organic agricultural ingredients?

22. How do you verify that ingredients and other inputs used meet verification requirements?

23. How do you verify certification of organic ingredients?

24. Do any non-organic ingredients used have annotations/restrictions for their use on the National List?

Yes No

25. If you answered Yes, describe compliance. If uncertain how to meet these requirements, please contact MOSA.

26. Are any non-organic ingredients designated on the National List as prohibited materials?

Yes No

27. Check if any non-organic ingredients have been produced, processed with or exposed to the following:

Ionizing radiation Genetic engineering Sewage sludge None of these

28. If you answered None above, do you have verification?

Yes No

29. 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. Attach processing aid labels and/or specification sheets, as applicable.

Do you use processing aids?

Yes No

30. If you answered Yes, describe how and why processing aids are used.

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

32. Are any processing aids NOT on the National List? If yes, explain.

33. Check if any processing aids have been produced, processed with or exposed to the following:

Ionizing radiation Sewage sludge Genetic engineering None of these

34. If you answered None, do you have verification?

Yes No

35. **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 Materials Inventory**.

Are any contact substances used during organic or non-organic processing?

Yes No

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

37. **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 Materials Inventory** and attach product information.

Attach available water test results.

How is water used in processing?

Not used Ingredient Processing aid Cooking Cooling Product transport
 Organic product cleaning Equipment cleaning Other

38. If you checked Other above, please explain.

39. List all sources of water (i.e. municipal, on-site well, etc.)

40. List any known water contaminants:

41. What on-site water treatment processes are used? (ex. softening, filtration (specify type), chlorination (specify where used) etc.)

42. Do you use water conservation strategies?

Yes No

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

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

Yes No

45. 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

46. If you checked **Other** above, explain:

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

ORGANIC MANUFACTURING AND HANDLING PRACTICES NOS §§205.201, .272

Procedures, processes, storage and equipment must prevent risk of commingling organic and non-organic 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.

62. PRODUCT FLOW

Provide a written description 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.

A schematic product flow chart may be attached to provide that information. If you have a formal OCP plan that contains information beyond what we ask here, please attach that plan.

63. EQUIPMENT

To prevent commingling and contamination, all equipment used in organic production or handling must be free of non-organic product and prohibited materials. Equipment used for both organic and non-organic processing or handling must be cleaned and/or flushed prior to use on organic products. Keep records of cleaning and flushing activities. Attach 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 attach SSOPs if desired).

Products used for equipment cleaning and sanitization must be listed on the Handler Materials Inventory. Attach product

information for each product listed.

64. Describe purge procedures, quantities purged, and purging documentation. If no equipment purging is done, indicate "n/a".

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

Yes No

66. If you answered No, explain:

67. **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 Materials Inventory** and attach product information for each product listed.

How is sanitation handled?

In-house By outside contractor

68. If you checked outside contractor, list the name of the contractor:

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

70. Are any cleansers/sanitizers listed as restricted or prohibited by the National List?

Yes No

71. What measures are in place to ensure that the residues of cleanser/sanitizers and/or non-organic food matter do not remain on processing equipment and/or containers when organic processing occurs?

pH testing of rinsate Residue testing on food contact surfaces Other

72. If you checked Other, explain:

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

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

75. Where are cleaning/sanitizing materials stored?

76. What methods are used to maintain employee hygiene?

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

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

91. INCOMING TRANSPORT

In what forms are incoming products received?

- Dry bulk Liquid bulk Tote bags Tote boxes Metal drums Cardboard drums Paper bags
 Foil bags Pails Other

92. If you checked *Other* above, explain:

93. How are incoming products transported?

- Tanker Trailer Common carrier Rail Self Other

94. If you checked *Other*, explain:

95. Who arranges incoming product transportation?

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

97. Is this inspection/cleaning process documented?

- Yes No

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

- Yes No

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

- Yes No

100. Are organic products shipped at the same time as non-organic in the same transport units?

- Yes No

101. What steps are taken to segregate organic products?

- Dedicated organic only Pallets Pallet tags Organic product shrink-wrapped
 Separate area in transport unit Other

102. If you checked *Other*, explain:

103. IN-PROCESS TRANSPORT

How are in-process products transported?

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

105. Is this inspection/cleaning process documented?

Yes No

106. 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

107. If you checked Other, explain:

108. How are outgoing products transported?

Tanker Trailer Common carrier Rail Self Other

109. If you checked Other, explain:

110. Who arranges outgoing product transportation?

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

112. Is this inspection/cleaning process documented?

Yes No

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

Yes No

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

Yes No

115. Are organic products shipped at the same time as non-organic in the same transport units?

Yes No

116. What steps are taken to segregate organic products?

Dedicated organic only Pallets Pallet tags Organic product shrink-wrapped
 Separate area in transport unit Other

Yes No

135. **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)?

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

137. Is this training documented?

Yes No

138. **QUALITY ASSURANCE**

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

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

140. Indicate type(s) of product testing used.

Ingredients prior to purchase Finished product Product during production Ingredients upon receipt None

141. How do you ensure ingredients have not been produced using genetic engineering, sewage sludge, or ionizing radiation? Examples could include GE/GMO testing, verification letters from producers, etc.

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

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

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

145. Describe product recall system, or attach product recall plan:

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

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

148. ADDITIONAL PRECAUTIONS.

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

Yes No

149. 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 NOS 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.

161. GENERAL INFORMATION.

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

162. What pest problems do you generally have?

Flying insects Crawling insects Spiders Birds Rats Mice Other

163. If you checked *Other*, describe:

164. PEST MANAGEMENT PRACTICES

Attach facility map showing location of traps and monitors.

Check all pest management practices used:

- 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

165. If you checked *Other*, describe:

166. Are your pest prevention methods and structural pest management system effective to prevent or control pests?
 Yes No

167. *If no, explain here.*

168. Are records kept of your monitoring activities?
 Yes No

169. *How often do you inspect your pest prevention system?*

170. *What changes do you anticipate to your pest management system?*

171. PESTICIDE USE INFORMATION

*List all pest control substances including baits, sprays, pesticides, or fumigants on the **Handler Materials Inventory**.*

Attach product composition and/or label information, if applicable.

Are pesticides used? If no, skip to Audit Trail and Inventory Control System.

Yes No

172. Are any products used which are prohibited by the National List?
 Yes No

173. If you answered Yes, did you contact MOSA for approval prior to product use?
 Yes No

174. *Indicate type of pesticide application records maintained:*

175. *Describe methods to prevent pesticide contamination of organic ingredients, finished products, or packaging materials:*

176. *Describe measures to reduce or prevent pest control product use in the future:*

177. *Where are pest control substances stored?*

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

AUDIT TRAIL AND INVENTORY CONTROL SYSTEM NOS §§205.103, .201

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".

189. 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.

Provide an Audit Trail Flow Chart or written description showing how all documents in your record system work together to enable traceability from receiving to shipping. **Identify all records used, by name or by record type**, for tracking products at receiving, in-process, in storage, and in shipping:

190. Describe your lot numbering system:

191. Describe how lot numbers and/or other specific identification used on documents enable traceability.

192. What types of records do you maintain?

Please have all records as noted below available for inspections. Submit sample records needed to show traceability.

- Labels and/or full ingredients and source information for all ingredients, processing aids, sanitizers used
 Input labels/composition list Equipment maintenance records Labor records Pest control log
 Documentation showing lack of commercial availability Residue analyses other

193. If you checked Residue analyses or Other, please specify:

194. Can your record keeping system track the *finished product in the marketplace* back to all ingredients?

- Yes No

195. Can your record keeping system balance organic product in and organic product out?

- Yes No

196. Can your record keeping system verify prevention of contact with prohibited substances?

- Yes No

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

198. 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 NOS 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. 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," or a similar phrase. 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.

210. PACKAGING

What types of packaging material are used?

- Bulk Paper Cardboard Wood Glass Metal Foil Plastic Waxed paper Aseptic
 Natural fiber Synthetic fiber Other

211. If you checked other, describe:

212. Are all packaging materials food grade?

- Yes No

213. Where are packaging materials stored?

214. 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.

215. Are packaging materials reused? If so, describe how these are cleaned prior to use:

216. What changes do you anticipate in your packaging?

217. LABELING

Do you expect to create labels for organic products? If so, describe type(s) and estimated timeframe for development: Attach samples if available.

218. Describe your system for verifying that all labels making an organic claim comply with the National Organic Standards.

219. 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 Questionnaire**. See the private label policy in the MOSA Program Manual for details.

Do you plan any private labeling?

Yes No

220. If you answered 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.

221. Please list the amount of net organic sales or income from organic sales. Net organic sales are gross sales less the cost of organic ingredients. No deduction to gross sales is made for ingredients (such as salt) that are not certified organic, or for other costs such as packaging, trucking, or production.

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

Yes No

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SAMPLE