



# Documentation Forms for Organic Crop and Livestock Producers

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There are three types of documentation that enable accredited certifying agents (certifiers) to verify a producer’s compliance with the National Organic Program (NOP) Regulations:

- a) The producer’s records of farm/livestock operation activities
- b) The Organic System Plan (OSP)
- c) Audit trail documents (e.g., purchase invoices, organic certificates, contracted custom application or harvest records, soil test results, sales invoices, etc.)

This publication provides a set of documentation forms to help producers of organic crops and livestock record their on-farm practices and production activities. These sample forms provide templates to help farmers organize the records that will be reviewed at inspection.

### The Organic Certification Process, in Summary

To become certified, organic crop and livestock producers must demonstrate to an accredited certification agency (certifier) that their operation complies with the National Organic Program Regulations. The process includes completion of an Organic System Plan (OSP), which accompanies the application for certification. The OSP describes how crop and livestock production will comply with the NOP Regulations by detailing the practices, the input materials, and the monitoring procedures that will be used. If the OSP and its accompanying materials indicate that the operation appears to be able to comply with organic regulations, the certifier sends an inspector to conduct an on-site inspection. The purpose of the inspection is to verify that farming or ranching practices are consistent with the OSP and compliant with NOP regulations. It is the inspector’s responsibility to review the producer’s recordkeeping system, including audit trail documents and records kept by the producer to demonstrate compliance with organic regulations. The inspector identifies any areas of concern, and submits a report to the certifier.

For more information, see the ATTRA publication *Organic Certification Process* at [http://attra.ncat.org/attra-pub/organic\\_certification.html](http://attra.ncat.org/attra-pub/organic_certification.html)

## Use of Documentation Forms

The forms in this set provide templates that may be used as they are presented or adapted to individual operations for documenting on-farm practices and input-application activities to demonstrate compliance with organic regulations. The forms can be stored wherever production activities occur, such as the truck, packing or storage area, barn, milk house, or machinery shed. These forms provide ideas for organizing information about your production (and on-farm handling) activities. They are primarily intended to help producers understand how to show compliance with the NOP Regulations for organic certification, but they also foster good business management. Use only those forms that are useful to you and your operation. You may download the entire publication or select individual forms.

**Please note that these are not required forms.** These forms are provided as templates that can be adapted according to individual business needs. Many certifiers provide documentation/record-keeping forms, and some strongly prefer the use of their own forms. Please check with your certifier in advance of using the forms provided here.

Many farmers and livestock producers find that once they are familiar with the actual language and requirements of the National Organic Program Regulations, it is easier to complete the OSP and implement and track production activities in a way that is readily verifiable. For that reason, ATTRA developed these sets of excerpts to assist producers in finding and understanding the sections of the organic regulations that apply to particular types of operations:

- *Organic Standards For Crop Production: Highlights Of The USDA's National Organic Program Regulations*, [http://attra.ncat.org/attra-pub/nopstandard\\_crops.html](http://attra.ncat.org/attra-pub/nopstandard_crops.html)
- *Organic Standards For Livestock Production: Excerpts Of USDA's National Organic Program Regulations*, [http://attra.ncat.org/attra-pub/nopstandard\\_livestock.html](http://attra.ncat.org/attra-pub/nopstandard_livestock.html)
- *Organic Standards For Handling (Processing): Highlights Of USDA's National Organic Program Regulations*, [http://attra.ncat.org/attra-pub/nopstandard\\_handling.html](http://attra.ncat.org/attra-pub/nopstandard_handling.html)

## National Organic Program (NOP) Regulations: Recordkeeping Requirements for Organic Certification

NOP Regulations require certified organic producers to keep records that are “adapted to the operation ... disclose all activities and transactions ... [are] maintained for not less than 5 years ... and [are] sufficient to demonstrate compliance” (NOP § 205.103). While NOP regulations require that all producers keep certain kinds of records, and that accredited certifiers verify that information, the regulations do not specify *how* producers must keep records. The format of organic-production records is flexible. Ultimately, records should provide a complete picture of the farming activities and be readily understood by the certifier. They may also be useful for tracking the production activities and business management of the individual operation. It is important, for example, to keep audit-trail documentation that is sufficient to determine the source, transfer of ownership, and transportation of any organic product.

During an inspection, the inspector reviews records of actual practices and compares those to the practices described in the producer’s OSP. Some examples of the types of records that need to be available for review at inspections include audit-trail documents such as seed, fertilizer, and soil amendment documents; pesticide purchase receipts; feed receipts; shipping records; sales invoices; and soil-, tissue-, or water-test results, if applicable.

These sets of documentation/recordkeeping forms are optional. They provide templates for producers to record details about actual practices. For producers who do not elect to use these forms, they remain a useful resource by identifying important and even essential contents for producers to include in their own records. Producers may download these forms and use them as they are or customize them to meet the needs of individual operations. Producers may create their own forms or design an alternative template or format from another source. That said, many certifiers favor a certain type of format and prefer that their certified clients use selected forms.

### Rewards of Recordkeeping

Clear records serve multiple functions. These forms are designed to foster recordkeeping by farmers and ranchers seeking to do the following:

- Meet compliance requirements for organic certification to NOP regulations (and some international organic standards, as applicable) by providing templates for documenting required information.

- Improve farm and business management by tracking and organizing relevant information about production activities, including whole-farm, crop, or enterprise planning and budgeting.
- Develop a farming systems approach. Many producers note that keeping records helps them to organize their observations, recognize patterns in relationships across the farm, solve problems, and develop sound plans.

## Areas of Recordkeeping Required

The NOP standards for crop and livestock production require that recordkeeping systems (§ 205.103) be adapted to the particular business that the certified operation is conducting and fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited. This may include a description of production activities and practices and their frequency; input substances or material applications—composition, source, and location(s) used; documentation of commercial availability, as applicable; transactions (harvest and sales records); monitoring practices and procedures and their frequency; and management practices and physical barriers to prevent commingling and contamination.

### Input Materials

Crop production materials are generally thought of as fertilizers, soil amendments, and pest-management materials, and they also include seeds and planting stock, annual transplants, seed treatments, and inoculants. Livestock production materials may include vaccines, biologics, disinfectants, sanitizers, topical medications, teat dip, anesthetics, parasitocides or homeopathic remedies, cleansers, or structural pest-control materials. The ATTRA publication *Organic Materials Compliance* (<http://attra.ncat.org/attra-pub/organicmaterials.html>) provides information about how to ensure that the materials considered for use are allowed (i.e., on OMRI or WSDA Products list, has the NOP seal on the label, or is certifier reviewed and approved). In general, for both crop and livestock production, materials must be either “natural” (and not listed as a prohibited nonsynthetic), or synthetic and specifically allowed for use in organic crop or livestock production or handling (see National List § 205.600-606). When describing a material to be used, include the complete product name and formulation (as applicable). It is necessary to correctly identify the manufacturer (who formulates, manufactures, and packages a product) in order for you and the certifier to verify that a product is allowed for use in organic production. Be careful to note the manufacturer (distinct from the distributor—a business from which you purchase a product but that does not make it). Identify the purpose for which it will be used (e.g., soil fertility or pest and disease management). Some materials, for example, are allowed for pest management but not as a soil amendment.

Some materials are allowed only for certain purposes and/or under certain circumstances. Complete documentation for the use of annotated or restricted materials includes the circumstances and timing of use and documentation (e.g., documentation of a nutrient deficiency to justify the use of synthetic micronutrients on crops, and preventive livestock health practices and parasite monitoring to justify the use of parasiticides at times other than during the last third of the gestation of organic offspring or during lactation).

### Production Audit Trail

The audit trail consists of records that track crops and livestock from their production and management in the field through harvest, transport, and sale. The farmer or livestock producer is responsible for keeping documentation of this journey as long as he or she owns the product. The audit trail is complete when the producer relinquishes custody of the product. Several versions of crop harvest and sales forms are provided in this publication,

each one useful in a specific application. Use the harvest- and sales-record forms that best meet the needs of your type of operation, whether your sales are made in larger quantities—such as several boxes to retail stores or wholesale customers—or in small quantities, such as those sold directly to consumers. Some records, such as direct-marketing records, can serve the dual purpose of harvest and sales records.

### ***Prevention of Commingling and Contamination***

Organic producers should be aware of potential sources of product mixing or contamination, also referred to as threats to organic integrity, and take measures to prevent and avoid each potential problem. Some risks may be under a producer's direct control in a split operation, where conventional production is under his or her management. Other risks call for risk-management measures such as notification, establishment of communication, and making requests for the cooperation of others—among them neighbors, county road departments, and utility companies—to minimize opportunities for contamination. The method of cleaning should be appropriate to the material that needs to be removed (how it adheres) and to the equipment (whether surfaces are smooth or rough and/or have corners or crevices). Cleaning methods may be either wet, utilizing spray equipment (rinsing, washing, or scrubbing), or dry (wiping, sweeping, or blowing with compressed air). Some types of equipment can be effectively cleaned by running them empty. For equipment that has no practical means of cleaning, a purge procedure may be the best approach. Several different types of forms are provided for different types of applications. As with other types of recordkeeping, documentation should be available for inspection to support the information recorded by producers. In the case of contamination prevention, these may include letters or statements regarding procedures from businesses providing contract services.

### ***Dry Matter Intake for Ruminant Livestock***

Producers need to document that organic ruminant livestock obtain, on average, at least 30% of their Dry Matter Intake (DMI) from grazing during the grazing season (NOP § 205.2, § 205.237, and § 205.240). The grazing season must be at least 120 days long, but it need not be continuous. Producers may choose and describe their methods for estimating Dry Matter Demand (DMD) and calculating DMI. In order to complete a DMI calculation, producers need the following:

- DMD estimates for class(es) of livestock produced. These may be found in tables on the NOP website, in livestock production manuals, and on certifier websites.
- Grazing records (dates livestock are on pasture throughout the year).
- Dry matter content of feeds—may be actual feed test results or values obtained from a chart of average dry matter contents.
- Feeding records for each ration period / class of livestock—type of feed, amounts, and dates fed.

Worksheets A and B below offer one DMI-calculation method. Several certifiers offer similar sample forms to facilitate DMI calculations.

See Appendix A: Dry Matter Intake Calculation Resources for Ruminant Livestock Producers for a more detailed explanation and reference information regarding Dry Matter Intake (DMI) calculations.

## **Available Templates: Select Forms that Work for Your Operation**

The attached recordkeeping/documentation forms are grouped according to the type of information they track. They include different options for diverse types of crop and livestock

producers to record how the descriptions in the OSP were implemented in practice. Choose or adapt the forms that best help you fulfill the main areas of required documentation.

## Included Forms

The following forms are included in this publication:

### Crops

#### *Land Use Records*

NOP § 205.202 Land Requirements

- Field History / Previous Land Use Record: Use this form to document NOP land requirements to establish a date of last application of prohibited materials and determine eligibility for organic certification.
- Land Use History Verification: Use this form to request the land's prior manager to describe the materials that were used.

#### *Activity Records*

NOP § 205.2 Records, Crop Rotation; § 205.103 Recordkeeping by Certified Operations; § 205.201 Organic Production and Handling System Plan

- Activity Log: Use this form as one option for recording all types of farm or ranch activities and making notes about various observations.
- Activity Calendar: Use this form as one option for recording all types of farm or ranch activities and making notes about various observations.

#### *Planting and Harvest and Crop Rotation Records*

NOP § 205.2 Crop Rotation; § 205.205 Crop Rotation Practice Standard

- Planting and Harvest Record: Use this form to record crop acreage and location, planting and harvest dates, yield, and sales.
- Crop Rotation Record: Use this form to document crop rotations, including harvested crops, cover crops, green manures, and forage crops.

#### *Input Material Records*

NOP § 205.2 Agricultural Input, Compost; § 205.203 Soil Fertility and Crop Nutrient Management Practice Standard; § 205.205 Crop Rotation Practice Standard; § 205.601 Synthetic Substances Allowed for Use in Organic Crop Production; § 205.602 Nonsynthetic Substances Prohibited for Use in Organic Crop Production

- Input Material Application Record: Use this form to record inputs, including manure, compost, soil amendments, fertilizers, potting soil, mulch, and pest-management materials.
- Compost Production Record: Use this form to describe how compost-production meets NOP requirements.
- Manure Application / Food Crop Harvest Interval Record: Use this form to document that the NOP-required interval of 90 or 120 days has passed between the application of raw manure and the harvest of a food crop.

#### *Seed and Planting Stock Records*

NOP § 205.204 Seeds and Planting Stock Practice Standard; NOP § 205.2 Commercially Available

- Organic Seed Nonavailability Records

- Suppliers of Seed or Planting Stock: Use this form to list the names and contact information of seed- and/or planting-stock suppliers who handle organic products.
- Nonorganic Seed or Planting Stock: Use this form to document the search for organic seed and planting stock as well as the reasons if they are unavailable. Also use this form to document how nonorganic seeds and/or planting stock qualify for an exemption per NOP and have been verified as untreated and non-GMO.
- Documentation of Allowability of Seed Treatments, Coatings, or Inoculants: Use this form to record seed treatments and coatings or inoculants.
- Seed Saving and Plant Propagation Record: Use this document to record the crop, field location, and storage location of harvested seeds and planting stock.

### ***Harvest, Inventory/Storage, Sales, and Transaction Records***

NOP § 205.103 Recordkeeping by Certified Operations; § 205.201 Organic Production and Handling System Plan

- Harvest Record: Use this form to track the harvest and sale of organic crops.
- Farmers Market Load List or Farm Stand Sales Record: Use this form to record the crops marketed and sold.
- Harvest Plan and Record “Pick List”: Use this form to record specific crop harvests and their quantities and sales destinations.
- CSA Weekly Harvest and Cost Summary: Use this form to record weekly harvest and sales to CSA members.
- Harvest Instructions / Record: Use this form to record directions for detailed harvest operations that vary with changes of season.
- Total Farm Sales Record: Use this form to summarize sales over the course of a season or a year.
- Storage Inventory Record: Use this form to track product storage and inventory.

### ***Prevention of Commingling and Contamination Records***

NOP § 205.201(a) (5 and 6) Organic Production and Handling System Plan; § 205.103 Recordkeeping by Certified Operations; § 205.272, Commingling and Contact with Prohibited Substance Prevention Practice Standard

- Equipment Cleaning Log: Use this form to document the cleanliness or cleaning of all application, harvest, and transport equipment that is not dedicated to organic use.
- Clean Transport Affidavit: Use this form to record verification that transport vehicles used for nonorganic materials are inspected and adequately cleaned.
- Buffer Crop Disposition Records: Use this form to document what happens to crops that are grown on buffer land that may be exposed to contamination from neighboring operations.
- Sample Neighbor Notification Letter: Use this form to request that neighboring landowners complete the Adjoining Land Use form.
- Adjoining Land Use Verification: Use this form for adjoining landowners to list the materials they use in their operations and/or to identify themselves as organic producers.

## Livestock

### ***Livestock Origin Records (Ruminant or Non-Ruminant Livestock)***

NOP § 205.236 Origin of Livestock

- Livestock List: Use this form to list all livestock for which organic certification is sought.

### ***Livestock Feed Records and Feed Additive and Supplement Records (Ruminant or Non-Ruminant Livestock)***

NOP § 205.237 Livestock Feed

- Livestock Feeding Record: Use this form to record feed rations fed on each date to each type and class of livestock.
- Livestock Additive and Supplement Use Record: Use this form to record feed additives and supplements provided to each type and class of livestock.

### ***Livestock Feed / Grazing and Pasture Management Records (Ruminant Livestock)***

NOP § 205.237 Livestock Feed, § 205.240 Pasture Practice Standard

- Grazing Days / Grazing Season Record: Use this form to record the days that livestock graze on pasture and the number of days in the grazing season.
- Pasture Rotation / Grazing Schedule / Animal Movement Record: Use this form to track the movement of animals and the rotation schedule of pastures.
- Ruminant Dry Matter Intake (DMI)—Calculation Methods Description and Summary of DMI Calculations from Feed and Grazing for All Ruminant Livestock in the Operation: Use this form to describe the methods of estimating Dry Matter Demand and summarize DMI percentages.
- Dry Matter Intake (DMI) Calculation Worksheet for Ruminants
  - Worksheet A – DMI from Non-pasture Feed Sources and from Grazing During Each Ration Period: Use this form to document DMI during the grazing season.
  - Worksheet B – Calculating the Average DMI from Pasture for the Grazing Season: Use this form to calculate the average DMI from grazing for each type and class of animal over the grazing season.

### ***Livestock Health Records (Ruminant and Non-Ruminant Livestock)***

NOP § 205.238 Livestock Health Care Practice Standard

- Livestock Health Record—Individual Animal: Use this form to record various aspects of individual animal management.
- Livestock Health Record—Poultry Flock: Use this form to record various aspects of poultry flock management.
- Livestock Materials List: Use this form to list specific materials for the care of organic animals and their environment.

### ***Livestock Living Conditions—Outdoor Access and Temporary Confinement Records (Ruminant or Non-Ruminant Livestock)***

NOP § 205.239 Livestock Living Conditions

- Non-Ruminants: Temporary Confinement / Outdoor Access Restriction Record: Use this form to describe the circumstances and reasons for actual temporary confinement of animals.

- Ruminants: Temporary Confinement / Outdoor Access and/or Pasture Grazing Restriction Record: Use this form to describe the circumstances and reasons for temporary confinement of animals and/or reasons animals are denied outdoor access or the ability to graze.

## A Note about Tracking Time and Money

While not required by NOP regulations, many of these recordkeeping/documentation forms could easily be adapted to include space or information fields for recording time (management and labor) and financial information. For some, adding those fields may offer the convenience of consolidating information on one form to facilitate the budgeting of time and money. Others prefer to keep financial information and budgeting separate from organic compliance.

## Feedback Invited for Ongoing Improvement of Forms

A great deal of work with certified organic farmers and ranchers, inspectors, and certifiers has gone into developing these forms. Even so, learning is an ongoing process. Farmers and ranchers find better ways of doing things every day, including keeping records. The National Center for Appropriate Technology (NCAT) welcomes practical feedback and suggestions for improving these forms by phone through its ATTRA project at 800-346-9140 or by email at [askanag@ncat.org](mailto:askanag@ncat.org).

## Acknowledgments

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## Disclaimer

As with all matters of organic compliance for certification, always check with your certifier to verify that the forms you plan to use constitute sufficient documentation for the activity.

For more information, please contact the  
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