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## **Instruction Recordkeeping**

### **1. Purpose**

This instruction outlines recordkeeping requirements under the NOP and provides examples of the types of records that should be maintained in conjunction with a certified operation's organic system plan (OSP).

### **2. Scope**

This instruction applies to all accredited certifying agents (certifying agents) and certified operations.

### **3. Background**

Section 205.103 of the NOP regulations requires that certified operations maintain records. Such records must fully disclose all activities in sufficient detail and in a format that can be readily understood, audited, and available for inspection. Certified operations must make records available for review by the NOP, the applicable State program's governing State official, and the certifying agent during normal business hours (§ 205.103(c)).

Section 205.201 requires certified operations to describe the recordkeeping system that will be implemented in accordance with § 205.103 as part of the OSP for their operation. The OSP serves as a management and verification tool specific to the unique characteristics of each operation and should reflect the practices, procedures, inputs, and recordkeeping approach that will be used by an operation.

Maintenance of records enables certified operations to meet the requirements for continuing their organic certification. On an annual basis, certified operations must submit to their certifying agent an updated OSP, which includes documentation of any deviations in the practices, procedures, and inputs from what was specified in the previous year's OSP and any changes to the previous year's OSP that will be undertaken in the coming year (§ 205.406(a)(1)(i-ii)). Documenting such changes allows certifying agents to verify an operator's compliance with the NOP.

### **4. Policy**

Certified operations can demonstrate compliance with the recordkeeping requirements under the NOP regulations by ensuring that the records maintained are up to date and sufficiently document the practices, procedures, and inputs used by the operation. Many certifying agents provide recordkeeping forms and sample OSPs specific to crops, livestock, handling, and retail



operations that may be suitable for documenting the activities and transactions of a certified operation. Certified operations and certifying agents can also consider the records listed when establishing their recordkeeping approach.

The records listed below are examples of records that can be used to demonstrate compliance with the recordkeeping requirements in the NOP regulations. Records maintained by the certified farm, ranch, handler or processor to demonstrate compliance with the NOP regulations need to be listed in the organic system plan. Check with your certifying agent to ensure that you are maintaining appropriate records to demonstrate compliance. Other records not listed below may also be useful to verify compliance with the NOP regulations.

## **5. Procedure**

### **5.1 Organic Crop Producer Records**

1. Seeds and Transplants – including cover crop and pasture seeds
  - a. Receipts of seeds and transplants delivered to farm
  - b. Invoices of seeds and transplants purchased
  - c. Seed packages and labels
  - d. Phone logs of attempts to obtain organic seeds and transplants
  - e. Seed catalogs
  - f. Letters from seed suppliers concerning the availability of organic seeds
  - g. Organic certificates for organic seeds purchased
  - h. For seed savers - Harvest records showing production of organic seed
  - i. Seed treatment records
  - j. Verification from supplier that non-organic seed is not genetically modified. This is only necessary for seeds that have commercially available GMO seeds (e.g. corn, soybeans, sugar beets)
2. Material Application Records
  - a. Fertilizer and soil amendments - application records for fertilizers, manure, compost, soil amendments, and synthetic micronutrients
  - b. Pest control products – application records for pesticides, acidifiers, spreader/stickers and other spray adjuvants
  - c. Crop production aids – application records for foliar sprays, gibberellic acid, kelp or other approved products
  - d. Invoices or receipts for all materials purchased including custom applicator invoices
3. Production Records
  - a. Farm activity log
  - b. Invoices for contracted services (e.g. seeding, mowing, spreading manure, etc.)
  - c. Recommendations from pest consultants or other field persons
  - d. Soil, water and tissue analysis reports
  - e. Records of cultivation practices, weeding and planting dates
  - f. Compost production records



4. Field History Records
  - a. Cropping history or land use for the previous three years
  - b. Material application records for the previous three years
  - c. A copy of the organic certificate if the land was previously certified under another producer's certificate
  - d. Lease Agreements
  - e. Maps
  
5. Harvest and Storage Records
  - a. Yield records (e.g. pounds harvested, weigh tickets, boxes harvested)
  - b. Receipts from processor or warehouse for delivery of organic product
  - c. Custom harvest records
  - d. Clean truck affidavits
  
6. Sales Records
  - a. Deposit records, ledgers, receipts
  - b. Purchase orders
  - c. Invoices
  - d. Sales summaries from wholesalers or processors

## **5.2 Organic Livestock Producer Records**

1. Origin of Livestock Records
  - a. Breeding, birthing, and weaning records (e.g. calendar, chart, notebook, veterinary documents)
  - b. Invoices, receiving records, and organic certification verification for all purchased animals
  
2. Feed Records
  - a. Organic verification for all purchased feed, including grain, hay or silage (e.g. copy of organic certificates)
  - b. Grain invoices with weights from your grain company
  - c. Records of purchased feed supplements, and animal health care products
  - d. Feed supplements and additive ingredient labels and purchase records
  - e. Feeding records
  - f. Harvest and storage records for feed grown on farm, feed labels, and organic certificates
  
3. Animal Health Care Records
  - a. Loss/cull records
  - b. Medication records
  - c. Vaccinations
  - d. Somatic cell counts



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4. Livestock Living Conditions and Pasture Records
    - a. Animal Identification records
    - b. Grazing records
    - c. Records of inclement weather
    - d. Records of when animals were temporarily confined with description of what allowable condition existed
    - e. Pasture rotation records
  
  5. Production Records
    - a. Date and weight at slaughter
    - b. Milk production records
    - c. Egg production records

### **5.3 Organic Handler & Processor Records**

1. Receiving Records – records that verify that product received was organic and records that verify the amount of organic product received
  - a. Organic certificate for each organic product or organic ingredient received
  - b. Clean truck affidavit for bulk product– verifies that truck was cleaned prior to hauling organic products
  - c. Invoices, purchase orders, bills of lading, scale tickets
  - d. Handler organic certificates and contracts
  - e. Certificates of analyses or Product Specification Sheets
  - f. Raw product inventory reports and records
  - g. Weigh tickets, receipts, and tags
  
2. Storage and Production Records – records that describe handling and processing activities
  - a. Non-organic ingredient records
  - b. Equipment clean-out logs
  - c. Product specification sheets and ingredient inspection forms
  - d. Recipes and product formulations
  - e. Ingredient usage reports and production logs
  - f. Quality Control reports
  - g. Records as to reconditioning, shrinkage, and dumping, container, storage and processing area clean- out and reuse
  - h. Purchased inputs, including ingredients, sanitizers, food contact substances, packaging, pest management materials
  - i. Inventory reports for ingredients and finished products
  - j. Packaging reports
  - k. Pest control and sanitation logs
  
3. Shipping Records – records that verify type and amount of organic product shipped
  - a. Pallet/tote tickets and scale tickets
  - b. Certificates of analyses
  - c. Purchase orders and sales journals



- d. Finished product inventory reports and records
- e. Shipping logs and bills of lading
- f. Export records and transaction certificates
- g. Sales, accounts payable, accounts receivable, and cash disbursement journals
- h. Broker's contracts and statements
- i. Phytosanitary certificates

## 6. References

### § 205.2 Terms Defined

*Audit trail.* Documentation that is sufficient to determine the source, transfer of ownership, and transportation of any agricultural product labeled as "100 percent organic," the organic ingredients of any agricultural product labeled as "organic" or "made with organic (specified ingredients)" or the organic ingredients of any agricultural product containing less than 70 percent organic ingredients identified as organic in an ingredients statement.

*Certified operation.* A crop or livestock production, wild-crop harvesting or handling operation, or portion of such operation that is certified by an accredited certifying agent as utilizing a system of organic production or handling as described by the Act and the regulations in this part.

*Certifying agent.* Any entity accredited by the Secretary as a certifying agent for the purpose of certifying a production or handling operation as a certified production or handling operation.

*Inspection.* The act of examining and evaluating the production or handling operation of an applicant for certification or certified operation to determine compliance with the Act and the regulations in this part.

*Organic system plan.* A plan of management of an organic production or handling operation that has been agreed to by the producer or handler and the certifying agent and that includes written plans concerning all aspects of agricultural production or handling described in the Act and the regulations in subpart C of this part.

*Records.* Any information in written, visual, or electronic form that documents the activities undertaken by a producer, handler, or certifying agent to comply with the Act and regulations in this part.

### **NOP Regulations (as amended to date)**

7 CFR § 205.103 Recordkeeping by certified operations....

(c) The certified operation must make such records available for inspection...

(6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations...

7 CFR § 205.201 Organic production and handling system plan...

7 CFR § 205.406 Continuation of certification.



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- (a) To continue certification, a certified operation must annually pay the certification fees and submit...
- (1) An updated organic production or handling system plan which includes:
- (i) A summary statement, supported by documentation...
  - (ii) Any additions or deletions to the previous year's organic system plan...

Approved on July 22, 2011