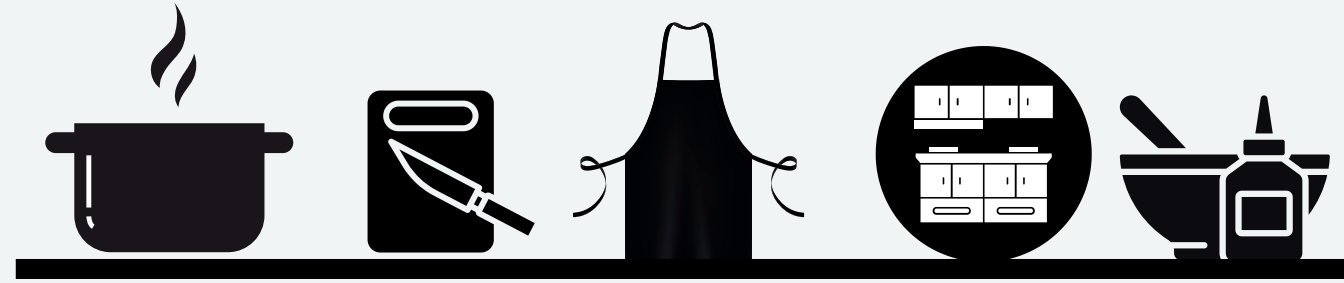


Organic Processing & Handling

A Recordkeeping Checklist



Ingredient, Supply Chain, Product Composition, Labeling



- Certificates of organic status (organic certificates) are on file for all ingredients received from suppliers to include supplier name, product, date received, quantity, and lot number
- Records verify that non-organic ingredients used are only those permitted under §§ 205.605 or 205.606 of the National List
- Purchase invoices and bills of lading are maintained for all organic inputs and ingredients
- Records of non-organic ingredient purchases are maintained, including type, source, and total amount used
- For imported organic products, records confirm the shipment was accompanied by an NOP Import Certificate and had no contact with prohibited substances since export
- Records document how each product's organic content percentage was calculated for labeling purposes
- Product formulations are on file showing the organic and nonorganic ingredients for each finished product SKU, consistent with the label claim used ('100% organic,' 'organic,' or 'made with organic')
- Records document that the certifying agent's name and address appear on all certified product labels

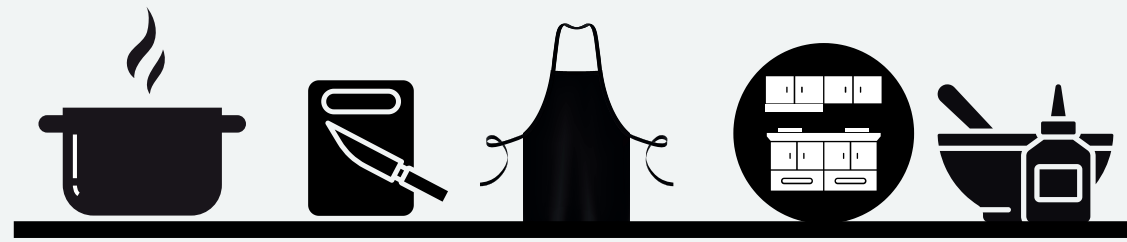
Handling, Commingling & Prohibited Substances



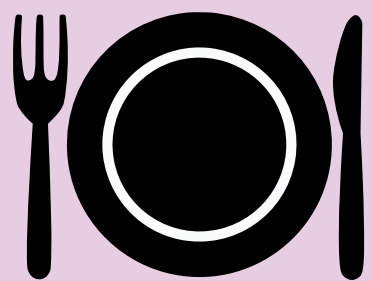
- Records document that only allowed mechanical or biological methods are used (e.g., cooking, baking, drying, grinding, fermenting, freezing, packaging, canning)
- Records demonstrate that nonagricultural substances and nonorganic ingredients used are permitted under § 205.605 & § 205.606 (National List)
- Records confirm that no excluded methods (e.g., genetic engineering), ionizing radiation, or prohibited substances were used in processing
- Records document practices used to prevent commingling of organic and nonorganic products during all stages of handling, processing, storage, and transport
- Records document practices to prevent contact of organic products with prohibited substances, including cleaning and sanitation protocols for shared equipment
- Equipment cleaning logs are maintained, noting cleaning agents used, dates, and sign-off by responsible staff

Organic Processing & Handling

A Recordkeeping Checklist



Pest Management



- Records document facility sanitation practices used to manage pests, including preventive mechanical and physical controls
- If pesticides are used, records confirm they are applied according to the product label and that no prohibited substances came into contact with organic products
- Records of any pest control applications include product name, EPA registration number, date and location of application, and applicator information
- Pest control logs are maintained and available for certifying agent review
- Organic Facility Pest Management Practice Standard ([see graphic here](#))

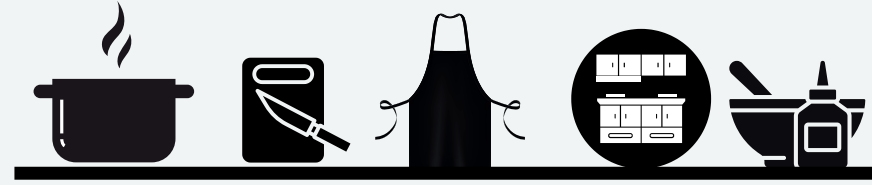
Mass Balance, Traceability, & Audit Trail



- Mass balance records account for all organic ingredients purchased and received versus the quantity of organic products produced, stored, sold, or transported
- Batch production records link organic ingredients through processing to finished organic products and allow complete traceability from purchase to final sale or transport
- Finished product sales records, including shipping documents, invoices, and bills of lading, are maintained and cross-referenced to batch or lot numbers
- Audit trail is sufficiently detailed to allow the certifying agent to trace any organic product back to its certified source

This checklist serves as an organic certification record keeping reference. Use it to stay organized throughout the year and prepared for inspections. You may not need every record listed—focus on those that reflect your operation's activities. Consult the current version of 7 CFR Part 205 at ecfr.gov and your Accredited Certification Agency (ACA) to understand which records are necessary for your ACA and inspector to fully understand your operation. This document does not substitute for legal advice or official regulatory guidance.

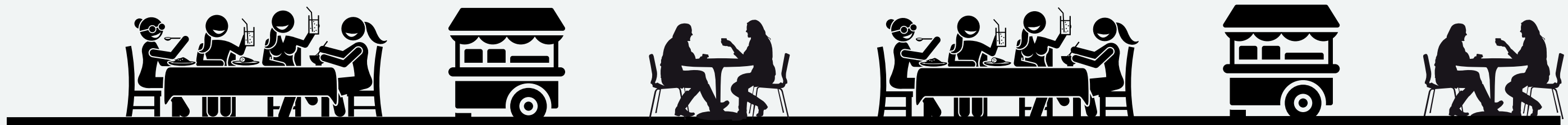
Organic Processing & Handling



General Recordkeeping, Certification, & Compliance



- Update your Organic System Plan annually by due date
- Complete the certification fee reimbursement application (usually through FSA or Dept of Ag)
- Gather all records for your annual organic inspection ahead of time
- Retain all records for at least 5 years
- Records fully disclose all activities and transactions of the certified operation in sufficient detail to be readily understood, audited and are applicable to NOP regulations
- Records are made available for inspection and copying during normal business hours upon request by USDA, the applicable State program's governing official, and the certifying agent
- Records are kept to record what methods are used (e.g., cooking, baking, drying, grinding, fermenting, freezing, packaging, canning) and what containers are used to process and prepare the product for market



United States Department of Agriculture
Agricultural Marketing Service
National Organic Program
Transition to Organic Partnership Program

