

Organic Handler Tip Sheet

New to organics? Use this tip sheet as a quick guide to some of the relevant regulations for handlers and processors. This sheet is **not** intended as a full overview of organic regulations, only as a helpful guide as you orient yourself to the regulatory framework.

You can find the full text of the National Organic Program regulations online: [eCFR 7 Part 205](http://www.ecfr.gov/title7/part205).

For further information, please see the below resources:

- [NOP Certification Manual](#)
- [National Organic Program Handbook](#)

Important National Organic Program (NOP) Regulations

Regulation	Key Takeaways - Click the Regulation for Full Text
National List of Allowed and Prohibited Substances §205.600-606	Also called The National List, this section covers the actual substances, not branded products, that are allowed or prohibited in organic production.
Organic System Plans §205.201	In order to be certified to the USDA Organic standard, you must create and maintain an Organic System Plan (OSP). An OSP is a complete record of your operation that outlines all your practices.
Recordkeeping §205.103	Certified organic producers are required to maintain records of their operation for 5 years. A good rule to keep in mind: if it happens on your operation, write it down and keep it.
Organic Handling Requirements §205.270	These requirements govern the methods and inputs that can be used to prepare and preserve organic products, as well as the use of nonagricultural products in organic food.
Organic Integrity §205.272	The organic operation must prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. These measures must be described in the Organic System Plan (OSP).

Facility Pest Management §205.271	<p>Organic facilities must take a tiered pest control approach, starting with management, sanitation, and mechanical methods. When those don't work, NOP approved substances may be used.</p>
Prevention of Commingling and Contamination §205.272	<p>Measures must be implemented to prevent the commingling of organic and nonorganic products and make sure organic products are not contaminated by prohibited substances.</p>
Labeling §205.300-305	<p>There are specific labeling requirements depending on the percentage of organic ingredients in your product. Labels must be submitted for pre-approval by QCS.</p>

This document is a general summary of the NOP regulations. It is **not** intended as a substitute for a complete reading and understanding of the law. More information can be accessed from the National Organic Program [website](#). The full text of the USDA organic standards can be accessed online here: <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205>

QCS is a USDA accredited certifying agent. QCS cannot provide consultation services to our clients, other than to ensure that their OSP is in compliance with the National Organic Program standards. QCS maintains a list of consultants on [their website](#). Note: it is not required to use an organic consultant and QCS cannot make recommendations on consultants.

A Note on Inputs: The National List & Material Review Organizations

Many new organic producers are anxious to use only approved substances on their operations – with good reason! The National List provides information on the individual substances that are allowed and prohibited in organic production. Third party, independent institutions known as material review organizations (MRO) are responsible for auditing branded products for compliance with the National List.

QCS recognizes four MROs: Organic Material Review Institute ([OMRI](#)), California Department of Food and Agriculture ([CDFA](#)), Pennsylvania Certified Organic ([PCO](#)), and Washington State Department of Agriculture ([WSDA](#)).

Always confirm that an input is approved for organic production **prior** to use by calling Quality Certification Services at 352-377-0133 and speaking with your certification reviewer or updating your inputs in your Client Portal.

Documents Required at Inspection

Please note: this is not an exhaustive list and additional documents may be requested by your inspector.

1. A copy (physical or digital) of your up-to-date organic system plan.
2. Completed organic product profiles and product formula documentation.
3. Supplier information for all ingredients in "100% organic/organic/made with organic" products.**
4. Purchase, shipping, and receiving records for incoming organic ingredients.***
5. Ingredient and final product storage/inventory records.
6. Production flow information and up-to-date facility maps.
7. Shipping/sales records for outgoing organic product.
8. Example of final packaging/labeling to be used on organic products.
9. Facility cleaning, sanitation, and pest control SOPs, records, and MSDS's.
10. If running a split operation, conventional production records may be requested as a part of the audit process.
11. Documentation of calculations pertaining to most recently completed QCS Gross Sales Assessment
12. Any other records or documents that may be needed to verify compliance

* While we'll typically be reviewing records pertaining to the current and previous years' production, please be aware that NOP regulations require that records be maintained for not less than 5 years beyond their creation.

** If sourcing organic product through excluded (uncertified) handlers under §205.101(b), be sure that records can trace all purchases back to the last certified organic handler or producer in the supply chain.

*** If you are directly importing raw ingredients/products into the US, or if imports are brokered by an excluded (uncertified) handler, include all related import documentation, i.e. Transaction Certificates/NOP Import Certificates, phytosanitary certificate(s), bills of lading, receiving records, etc.

Additional Resources

[QCS's Frequently Asked Questions](#) - answers to general questions about certification.

[QCS's External Resource Page](#) - links to external education and resources.

[Florida Organic Growers \(FOG\)](#) - FOG provides resources to organic operations in Florida and beyond.

[Organic Materials Review Institute \(OMRI\)](#) - an MRO with a wide array of products approved for use in organics.

[USDA Sustainable Agricultural Research and Education \(SARE\)](#) - Farmer-driven innovations in agriculture that improve profitability, stewardship and quality of life

[USDA Transition to Organic Partnership Program \(TOPP\)](#) - Resources for producers seeking to transition to organic production practices.

[Organic Trade Association](#) - A national members-based trade organization that provides resources to organic producers and advocates for organics at a national level.

[Organic Certification Cost Share Program](#) - Organic operators based in the US can apply for cost share reimbursement for 75%, up to \$750, for organic certification costs incurred from October of the previous year to September of the current year.