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| **OHP 06: Recordkeeping For Handlers** | USDA Organic Regulations §205.103  Regulation (EU) 2018/848 |
| *Certified operations must maintain records of the production, management, and handling of agricultural products intended to be sold, labeled, or represented as organic. Records must fully disclose all activities and transactions of your operation in enough detail to be readily understood and audited.*  *Records must span the time from purchase or acquisition through production to sale or transport and records must be traceable back to your operation or the last certified operation.*  *Records must be sufficient to demonstrate compliance with the organic regulations,* ***kept for at least five years****, and made available for inspection, including records related to conventional production, if applicable.* | |
| 1. **LOCATION OF RECORDS**   *Please provide details on the location where all organic records can be reviewed during inspection. If the location of records is identical to the physical location address provided in OSP 01: General Application, skip to Section B.*  Identical to physical location address in OSP 01   |  |  |  |  | | --- | --- | --- | --- | | Address: | | | | | City: | State: | Zip/Postal Code: | Country: | | Phone: | | Fax: | | | |
| 1. **RECORDKEEPING SYSTEMS** 2. Which of the following records do you currently or plan to use to track organic products? Check all that apply. **Optional**: Attach recordkeeping templates for reference.  **Attached**   **Incoming Records**   |  |  |  |  | | --- | --- | --- | --- | | Purchase orders  Contracts  Invoices  Receipts | Bills of lading  Customs forms  Scale tickets  Certificates of Analysis | Transaction certificates  Receiving records  Import certificates  Organic certificates  Exempt Handler Affidavits | Purchase and sales records for brokered or resold products  Other. Please specify: |   **In Process:**   |  |  |  |  | | --- | --- | --- | --- | | Ingredient inspection forms  Sanitation logs | Blending reports  Packing reports | Production reports  Equipment cleanout logs | QA reports  Other. Please specify: |   **Storage:**   |  |  |  |  | | --- | --- | --- | --- | | Ingredient inventory reports | Finished product inventory reports | Other. Please specify: |  |   **Outgoing:**   |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Purchase orders  Sales orders  Sales invoices | Shipping summary logs  Scale tickets  Transaction certificates | | Sales summary logs  Organic certificates | Export declaration forms  Other. Please specify: | | |  | |  | | |  1. What methods do you use to keep records? Check all that apply.   Paper/notebooks  Computer software/spreadsheet  Phone app  Online/Cloud program  Other. Please describe:   1. Do you maintain records for a minimum of 5 years?  Yes  No. Please explain: | |
| 1. **AUDIT TRAIL DOCUMENTATION**   *An audit trail is documentation that is sufficient to determine the source (certified supplier), purchase or acquisition, transfer of ownership, physical possession, receipt, handling, production, processing, sale, and transportation of organic products****.*** *Audit trail records include but are not limited to purchase invoices, contracts, storage records, labels, sales invoices, organic certificates, bills of lading, and other transport documents.*  *Audit trail documentation must:*   * *identify products and ingredients as “100% Organic”, “Organic”, or “Made with Organic…”* * *link back to the last certified operation in the supply chain that handled the organic product* * *be linked to the product label via lot number, shipping identification, or other unique identification printed on the label* * *be sufficient to determine the source, transfer of ownership, and transportation of the organic product* | |
| 1. Describe or attach a diagram of how your audit trail system tracks finished products from the last certified operation (ingredient purchasing) through transport, storage, receiving, production or packing to final outbound shipping or invoice.  **Attached**        1. Describe the records and system used to track inventory of ingredients and products (in/out balance), including how often inventory is conducted and recorded. You may attach sample documents to illustrate system (e.g., monthly log of beginning and ending inventory).  **Attached**      1. Does your audit trail documentation identify all agricultural products as “100% Organic”, or “Organic”?  Yes  No 2. If using lot numbers, describe below your lot numbering system used to link your audit trail and track organic crops/products.   *N/A, I do not use lot numbers*   |  |  |  |  |  | | --- | --- | --- | --- | --- | | ***EXAMPLE: Lot Number: 24281O06*** | | | | | | ***Code****:* | *24* | *281* | *O* | *06* | | ***Signifies:*** | Year: 2024 | *Julian date of production* | *ORGANIC* | *Plant location* | | ***Lot Number:*** | | | | | | **Code**: |  |  |  |  | | **Signifies:** |  |  |  |  |  1. Do you purchase organic ingredients or organic products from uncertified (exempt) handlers (e.g., brokers, traders, distributors)?  Yes. *Submit a completed* ***Exempt Handler Affidavit*** *for each uncertified handler.*  No    1. If yes, how do you ensure records are traceable back to the last certified operation in the supply chain? 2. Does the audit trail documentation for nonretail containers identify the last certified operation that handled the agricultural product?  Yes  No | |