

Module 6A Recordkeeping and Labels for Nonprocessors

This Module is to be completed by operations that are Nonprocessors. Nonprocessors are operations that do not produce, pack, label, or otherwise process organic items. Examples of such operations are sellers, brokers, traders, distributors, brand owners, and storage facilities. Operations must describe their recordkeeping system that has been implemented to comply with the requirements established in § 205.103. (§ 205.201(a)(4)).

Operation Name:	
Date:	

SECTION I: General Principles and Labels

A. General Principles	
1. Do all audit trail documents identify agricultural products as “100% Organic,” “Organic,” or “Made with Organic (Specified Ingredients or Food Groups)” for organic items? Such identification may be by use of abbreviations or acronyms.	<input type="checkbox"/> Yes.
2. Does this operation understand that: <ul style="list-style-type: none"> ➤ It must make the records available during the inspection and upon request by the certifying agent (such requests may include requests to see financial records or records related to nonorganic handling). ➤ The recordkeeping system must fully disclose activities and transactions in sufficient detail to be readily understood and audited. ➤ All records related to organic handling must be maintained for a minimum of five (5) years. ➤ All operations must maintain access to the USDA NOP regulations either physically or electronically and maintain a copy of their application Modules (and attachments) as submitted to Americert. 	<input type="checkbox"/> Yes.
B. Labels	
1. Does this operation distribute, broker, or trade products that carry labels (on retail or nonretail containers or packaging) that: <ul style="list-style-type: none"> ➤ Carry a “Certified Organic by Americert” phrase or carry the Americert seal? ➤ Carry this operation’s name as manufacturer or distributor? 	<input type="checkbox"/> No. <input type="checkbox"/> Yes. Attach copies of all such labels.
2. Does this operation operate as a Brand Owner that has other operations package any products for them into its branded packaging or labels (either retail or nonretail) on its behalf?	<input type="checkbox"/> No. <input type="checkbox"/> Yes. Attach copies of all such labels.

SECTION II: Traceability (§ 205.103(b)(2) and (3))

Traceability examines the audit trail for an operation’s organic products. It follows a product through the entire process at, with, or through the operation. A trace-back starts with one lot of finished products and follows it backwards through the entire chain of records to the product purchased or received. Traceability may be conducted on any organic items brokered, traded, or stored by this operation. Certified operations are responsible for traceability within their operation, back to their suppliers, and forward to their customers. Trace-backs generally involve tracing a shipment of randomly selected product from this operation’s end customer back to the warehouse where stored (if applicable) to the original copacker or supplier solely through the use of records obtained and maintained by this operation.

Operations must have systems in place to enable traceability back to the last certified organic source and forward to the next step in the supply chain. Systems must be sufficient to trace through uncertified operations in supply chain, if any. Operations receiving/purchasing/brokering/distributing organic products from uncertified suppliers must keep

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records demonstrating how the uncertified operation maintained organic product integrity. This may require keeping records from several uncertified operations in sequence; in all cases, the records must show an audit trail back to the last certified operation. Operations can demonstrate an audit trail by using various types of documentation that are typically used during sale, purchase, and transfer, such as receipts, invoices, shipping, or receiving manifests, shipping logs, bills of lading, or transaction certificates.

NOTE: While there is some overlap with product recall exercises, please note that **TRACEABILITY IS NOT THE SAME AS A PRODUCT RECALL**. While a recall focuses on consumer safety and recalling a product line(s), a successful traceability requires the ability to successfully connect a specific product to a specific organic item purchased or received.

A. Overview	
<p>1. Audit Trail/Supply Chain Map. Describe this operation’s audit trail. List any uncertified entities in the purchasing or warehousing supply chain. Identify the supply chain moving from suppliers this operation receives, brokers, distributes, or purchases from through storage (if any) and to customer, buyer, or the next step in the supply chain.</p> <p>For example: This operation purchases from Certified Operation X, receives product at this operation’s warehouse via an uncertified transporter, stores product, and ships product out to final retail establishments via uncertified transporters.</p>	Describe or attach a diagram:
<p>2. Does this operation have systems in place so that randomly chosen organic items brokered, traded, or distributed by this operation can be traced from sale or transport of organic items back to purchase or acquisition of organic items to determine the last certified organic source and date purchased or acquired?</p>	<input type="checkbox"/> Yes.
<p>3. What unique traceability identifiers are used in this operation’s audit trail to link (using records alone) each step of the supply chain from the end customer back through the audit trail to the original supplier/copacker and the date that organic item was purchased or received? [SELECT ALL THAT APPLY]</p>	<input type="checkbox"/> Supplier lot numbers <input type="checkbox"/> Lot number assigned by this operation <input type="checkbox"/> PO numbers <input type="checkbox"/> Transaction/Order numbers <input type="checkbox"/> Invoice numbers <input type="checkbox"/> Container numbers <input type="checkbox"/> Product lot numbers <input type="checkbox"/> Shipping Identification Numbers <input type="checkbox"/> Other:
B. Outbound Documents.	
<p>1. Sales. Does this operation maintain documentation of sales or distributions (such as Sales Invoice, Sales Order, Outbound Shipping Log, or Customer Purchase Order)?</p> <p>Note: All organic handlers must maintain records of products sold, serviced, and shipped from their facility, their contracted storage facility, or their supplier (if brokering, distributing, trading) that is made contemporaneously with the sales event. Such records must link back towards the receiving at the warehouse/storage (if used) and to the supplier and incoming/initial transport, as well as forward to arrival at the customer.</p>	<input type="checkbox"/> Yes.
<p>2. Delivery/Outbound/Distribution/Shipping Records. Does this operation maintain documentation of outbound shipping (such as BOL, trip tickets, manifest detail, shipping logs, packing list)?</p>	<input type="checkbox"/> N/A as product is shipped directly from last certified organic source to buyer/customer. <input type="checkbox"/> Yes.

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<p>Note: All organic handlers must maintain records of products shipped from their facility, their contracted storage facility (or copacker), or their supplier (if brokering, distributing, trading) that is made contemporaneously with the shipping event. Such records must link back towards the receiving at the warehouse/storage (if used) and to the supplier and incoming/initial transport, as well as forward to arrival at the customer.</p>	
<p>3. Delivery. Does this operation maintain delivery confirmation that documents the customer receiving shipment (such as delivery tracking confirmation, payment of invoice used as proof of delivery, or signature on outbound BOL)?</p>	<input type="checkbox"/> Yes.
<p>Note: Delivery confirmation can be documentation the final customer received the shipment, a signature of receiver on BOL, or by using the invoice payment as proof of delivery.</p>	
<p>C. Inbound Documents.</p>	
<p>1. Does this operation maintain a receiving log, records, or notifications of organic items received at this operation's location?</p>	<input type="checkbox"/> N/A, organic items are not physically received at this operation's location. <input type="checkbox"/> Yes.
<p>2. If this operation receives organic items at a contracted offsite storage, does this operation maintain notifications the contracted storage or warehouse has received the load?</p>	<input type="checkbox"/> N/A, no offsite storage is used. <input type="checkbox"/> Yes.
<p>3. Inbound, Purchase, or Acquisition Shipping. Does this operation maintain documentation of initial/inbound shipping (such as BOL, trip tickets, manifest detail, packing list)?</p>	<input type="checkbox"/> Yes.
<p>Note: Records must be maintained about the incoming/initial transport of all organic ingredients, crops, products, or materials received, brokered, traded, or distributed from the last certified organic source. If offsite storage is utilized, such records may include bills of lading or receiving records (such as receiving report or invoice or bill issued by warehouse/storage facility) of products received by the storage facility or warehouse.</p>	
<p>4. Purchase/Acquisitions. Does this operation maintain purchase orders, purchase invoices, or notification from the ingredient sourcer, contracted party, or organic item broker/distributor that notifies this operation of the pending inbound load?</p>	<input type="checkbox"/> Yes.
<p>Note: Records must be maintained of all purchases/acquisitions of organic items. Purchase documents could also be a document from or to the supplier showing purchase or other payment arrangements, fees, commissioned sales, product transactions, etc.</p>	
<p>5. Organic Certificates. Does this operation have a current organic certificate on hand for the last certified organic source listing the product brokered or ingredient purchased?</p>	<input type="checkbox"/> Yes.
<p>Note: The copacker is considered the last certified organic source for distributed copacked product.</p>	
<p>6. Uncertified Operation Affidavits. If uncertified operations are in the supply chain, does this operation have a current Uncertified Operation Affidavit for each?</p>	<input type="checkbox"/> N/A, no uncertified operations in purchasing or acquisition supply chain. <input type="checkbox"/> N/A, the only uncertified operation(s) selling or otherwise providing organic items to this operation is/are retail establishments. <input type="checkbox"/> Yes.
<p>7. Retail Establishments. If retail establishments are in the supply chain, does this operation maintain these MANDATORY records for trace-back purposes?</p>	<input type="checkbox"/> N/A, no retail establishments in supply chain. <input type="checkbox"/> Purchase receipts or invoices noting the date purchased, amount purchased, product purchased, and some indication (such as abbreviation "OG") of the organic status of the product. <input type="checkbox"/> Photographs of a representative unit of each product purchased (such as one carton of milk from twelve cartons purchased on a specific date) that clearly shows the front label and the back label, including a clear image of the identification of the handler/distributor and COB statement; <input type="checkbox"/> Photographs of a representative unit of each product purchased (such as one carton of milk from twelve cartons purchased on a specific date) showing the product is sealed in a tamper-evident way such that it was not produced or processed by the exempt operation; <input type="checkbox"/> A receiving log or other methods of recording the supplier lot numbers for the items purchased/brokered; and <input type="checkbox"/> A method of assigning a unique internal lot number to the items purchased/brokered.

SECTION III: Mass Balance

Mass balance audits evaluate whether this operation received or purchased enough organic items to support the amounts of organic items shipped and sold. Mass balances require the ability to demonstrate sales, purchases, or receipts over a given period balance with the amount of product shipped by the supplier, copacker, or warehouse during that same time period. Americert (or its Inspectors) may conduct an exercise on amounts physically received, amounts this operation has on hand in offsite storage, and/or amounts purchased and distributed during a specific time period to verify amounts purchased/received against amounts shipped and amounts sold.

Mass Balance	
<p>1. Product Inventories. Does this operation conduct, document, or maintain an actual physical count of the amounts of product on hand in current inventory (held onsite or at an offsite storage facility on this operation's behalf) at least twice per year?</p> <p>Note: Operations must generally maintain product inventories, conducted at least twice a year, of product on hand at this operation's physical location or at the offsite storage used by this operation. An actual physical count at least twice per year of inventory (product and amounts) held at the warehouse on an operation's behalf must be conducted and documented.</p>	<p><input type="checkbox"/> N/A, as this operation does not store organic items (either offsite or onsite). This may happen in situations where organic items received or purchased are only to meet specific customer orders and distributed/sold in full prior to next receipt or purchase of organic products.</p> <p><input type="checkbox"/> N/A, this operation has a limited activity period each year that begins with zero inventory and returns to zero inventory at the end of the season or production event.</p> <p><input type="checkbox"/> Yes.</p>
<p>2. Additions and Deductions from Inventory. Does this operation maintain records of all additions to and removals from inventory for all organic products?</p> <p>Note: All organic handlers receiving organic items (physically or at an offsite warehouse) must record all additions to and removals from the product inventory. Additions to inventory may be from receiving products or ingredients or from returns added back to inventory. Deductions from inventory may be from products sold, shipped, destroyed, donated, given as samples or promotional giveaways, taken for personal or other in-house uses, employee comps, discarded, expired, or diverted to use in nonorganic production or sales.</p>	<p><input type="checkbox"/> Yes</p>
<p>3. Describe the records and system this operation uses to track inventory of organic items (in/out mass balance):</p>	

SECTION IV: Attestation

I attest this information is accurate and complete.	<input type="checkbox"/> Yes
Date Completed:	
Name of Person Completing Form:	