



## AMERICERT INTERNATIONAL

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### Guidance on Completing Handler Organic System Plan Modules: Module 7 Physical Facility

03/10/24

Module 7 is to be completed by operations with a physical facility at which they receive organic items. Operations must provide a description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances. §205.201(a)(5).

This module provides operations the opportunity to describe the handling activities that take place at their physical facility with regard to organic and nonorganic items. Physical facilities must provide a Site Map and Process Flow; disclose certain information related to packaging, storage, and processing; and disclose their pest control plan for the organic production and storage areas.

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#### Section 1: General Instructions

1. The majority of the questions are “Yes/No” or “Select All That Apply.” To complete a checkbox for your chosen answer, move your mouse cursor over the desired box and click it to select the desired box.
2. Other questions are fill in the blank or ask you to provide a brief response. Please type in your response in the spaces provided.
3. If a question in a Module tells you to “Skip” to another part of the Module, please do so. For example, here is one question from a Module.

1. Is this operation a private label brand owner/marketer that contracts an independently certified copacker to produce, pack, manufacture, process, or handle organic items into this operation's brand packaging?
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- |   |
|---|
| <input type="checkbox"/> No. <b>Skip to Part C.</b> |
| <input type="checkbox"/> Yes.                       |

If you answer “No” to this question, follow the instructions within the question and “Skip to Part C.”

4. For “Select All That Apply” questions, please do not merely submit SOPs instead of answering the questions in the Modules. Each question and answering options are there for a reason. You may, however, submit SOPs in addition to answering the questions.
  5. For fillable text answers, if the space provided is insufficient, please write “See Attached” and attach a document containing your response. For example, in the Pest Control section, you can attach a list of the pest control products used, listing name and manufacturer.
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### **Section 2: Site Map and Process Flow**

#### A. Site Map.

Operations must provide an accurate site map with all organic processing and storage areas identified as organic and with all equipment used in organic handling listed and identified as organic. This map must identify all organic processing and storage areas (such as receiving dock, storage, staging area, processing room, packing room, finished product storage, etc.). It must also list or identify as organic all equipment used in organic handling (such as dedicated organic pumps, organic conveyor, packing tables, grinders, fillers, dump or dunk tanks or bins, roasters, ovens, fill station, mixers, coolers, freezers, labeling station, scoops, molds, etc.). The facility diagram must be accurate and updated as needed. This diagram must be submitted to the certifying agent and will be reviewed for accuracy during onsite inspections.

#### B. Process Flow.

Operations must submit an accurate schematic product flow chart or a written description which shows or describes each step of how organic ingredients and products are handled and processed and that indicates where such activities take place. Operations with more than one type of process must be sure to submit a process flow for each process type. The process flow should include all organic events and production steps (including receiving, storage, processing, packaging, labeling, and warehousing). The process flow should also include all equipment and utensils used at each step and any machinery used. The process flow should describe the event, where it takes place, any record generated for that event/step, and any substances used in contact with organic items at that stage. A process flow diagram is similar in some ways to a facility diagram but is narrative in form and includes a greater amount of detail. The process flow description must be accurate and updated as needed. This process flow description must be submitted to the certifying agent and will be reviewed for accuracy during onsite inspections.

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### **Section 3: Packaging and Processing**

A. Nonretail Containers and Packaging. Nonretail containers used in storage or transport of organic items must be identified as organic and must have a traceability identifier (such as a unique lot number, shipping identification, or other unique identifier that links to the audit trail). Organic identification of nonretail containers can be accomplished in a variety of ways:

- By using the word “organic” or USDA seal on the container.
- By using abbreviations or acronyms (such as “OG”) on the container.
- By using temporary labels or signage on the container or storage area for container.
- By having the nonretail container contain retail product that has organic status clearly indicated on the retail unit.
- By using some other method approved by Americert in advance. This alternative method must be approved by Americert prior to implementation and must be described in Module H7.

#### B. Processors.



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1. Processors must have a practice to verify packages or containers packed into are free of prohibited materials (such as fungicides, preservatives, or fumigants) which may interact with organic items. For example, processors may need to maintain documentation from the packaging manufacturer that the material is food grade.
2. If containers or packaging are reused, operations must describe in Module H7 how organic integrity is maintained for reused packaging or containers (such as by cleaning/sanitizing them prior to use in organic production or by dedicating them for organic use only).
3. Any packaging aids used in packaging (such as popsicle sticks, nitrogen gas, CO<sub>2</sub>, desiccant in packaged inserts, etc.) MUST be listed and disclosed in Module H8 Materials Used.
4. “Active Packaging” that emits or releases chemicals into organic products (such as ethylene scavengers, antimicrobials, or antioxidants) are likely prohibited because active agents migrate into the organic product.
5. If equipment used in organic production or processing is not dedicated for use with organic ingredients and products only, measures must be implemented to protect against contamination and commingling. Such measures include such procedures as purging or flushing equipment prior to organic production or cleaning equipment prior to organic production. If purges or flushes are used, details must be included in Module H7 of the procedures, what is used to purge/flush, the amount used, how that amount was determined to be sufficient, where purged product goes, and how the purge is documented. If cleaning events are not documented in a cleaning log or SOP, details must be included in Module H7 explaining how cleaning is known to be completed.

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### **Section 4: Pest Control**

Pests can cause serious problems for those who manage organic facilities. Complications range from economic hardship to health concerns. It is important to practice pest management strategies in order to maintain pest populations below economically damaging levels, as well as minimize the harmful effects that come with pest control on human health and environmental resources. Under organic management, facilities must use a tiered approach, exhausting certain methods of pest management prior to using others. All pest management activities must be described in Module H7 and documented on an on-going basis.

§205.271 of the USDA NOP Organic regulations governs all pest control practices **used in organic production and storage areas**. Pest control practices are assigned a level running from Level 1 Pest Control Measures through Level 4 Pest Control Measures. Level 1 must be implemented. Higher levels, such as Levels 2-4, can only be used if the lower levels have been effectively implemented and proven ineffective to control pests as documented through continued pest sightings. Any pest control substances used must be used in a manner that does not lead to contamination of organic items, packaging materials, or food contact surfaces.



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### **§ 205.271 Facility Pest Management Practice Standard.**

(a) The producer or handler of an organic facility must use management practices to prevent pests, including but not limited to:

- (1) Removal of pest habitat, food sources, and breeding areas;
- (2) Prevention of access to handling facilities; and
- (3) Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction.

(b) Pests may be controlled through:

- (1) Mechanical or physical controls including but not limited to traps, light, or sound; or
- (2) Lures and repellents using nonsynthetic or synthetic substances consistent with the National List.

(c) If the practices provided for in [paragraphs \(a\)](#) and [\(b\)](#) of this section are not effective to prevent or control pests, a nonsynthetic or synthetic substance consistent with the National List may be applied.

(d) If the practices provided for in [paragraphs \(a\)](#), [\(b\)](#), and [\(c\)](#) of this section are not effective to prevent or control facility pests, a synthetic substance not on the National List may be applied: *Provided*, That, the handler and certifying agent agree on the substance, method of application, and measures to be taken to prevent contact of the organically produced products or ingredients with the substance used.

(e) The handler of an organic handling operation who applies a nonsynthetic or synthetic substance to prevent or control pests must update the operation's organic handling plan to reflect the use of such substances and methods of application. The updated organic plan must include a list of all measures taken to prevent contact of the organically produced products or ingredients with the substance used.

(f) Notwithstanding the practices provided for in [paragraphs \(a\)](#), [\(b\)](#), [\(c\)](#), and [\(d\)](#) of this section, a handler may otherwise use substances to prevent or control pests as required by Federal, State, or local laws and regulations: *Provided*, That, measures are taken to prevent contact of the organically produced products or ingredients with the substance used.

Operations must document pest control activities and protection of organic items. If pest control substances are used in the facility, documentation must be maintained that records what was applied, when it was applied, and where it was applied. Pest sighting logs must be maintained documenting what, when, and where the pest activity was observed.

Pest management for organic producers and handlers who have storage and/or processing facilities is a multi-tiered system. The escalating levels of pest control in organic facilities are as follows:

Level	Examples	Prerequisites or Restrictions
Level 1 Prevention and Exclusion § 205.201(a)  The first step is using management practices to prevent problems before they occur.	<ul style="list-style-type: none"> <li>• Remove pest habitats, food sources, and breeding areas.</li> <li>• Prevent access to handling facilities.</li> <li>• Maintain good refuse and trash management.</li> <li>• Ensure pest exclusion</li> <li>• Manage environmental factors (such as humidity, atmosphere, temperature, air curtains, or air circulation) to prevent pest reproduction.</li> </ul>	<ul style="list-style-type: none"> <li>• Mandatory Implementation</li> </ul>



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	<p>Keeping facilities sanitary, removing exterior habitat and food sources, mowing, sealing doors and windows, and creating physical barriers to prevent pests from entering are some examples of pest prevention practices.</p>	
<p>Level 2 Mechanical and Physical Controls § 205.201(b)</p> <p>If problems persist in spite of the operator’s best prevention efforts, Level 2 measures may be used.</p>	<ul style="list-style-type: none"> <li>• Mechanical or physical controls (such as physical traps, light, sound, glue traps, electrical traps, ultraviolet, ultrasonic)</li> <li>• Non-pesticide repellants (such as natural oils, etc.)</li> <li>• Pheromone lures and repellants using non-synthetic or synthetic substances consistent with National List</li> </ul> <p>Pest controls such as sticky, mechanical, or pheromone traps may be used. Lures and repellents using nonsynthetic or synthetic substances consistent with the National List may also be used. (Note that if the mode of action is to kill the pest, the substance is not a lure or repellant, it is a pesticide.)</p>	<ul style="list-style-type: none"> <li>• Must use Level 1 prior to use of Level 2</li> <li>• If Non-pesticide repellents or pheromone lures and repellents are used, the product name and manufacturer must be disclosed in Module H7, along with SDS for the product. If a Level 2 substance is used, the exact product name and manufacturer must be disclosed to Americert, so that Americert can confirm it is a Level 2 substance.</li> </ul>
<p>Level 3 Pesticides Specifically Listed in the NOP Regulations</p> <p>When prevention and mechanical/physical control methods are not enough, nonsynthetic and synthetic pest control materials that are consistent with the National List may be used.</p>	<ul style="list-style-type: none"> <li>• Ammonium carbonate</li> <li>• Boric acid</li> <li>• Botanical pesticides (e.g., botanical oils)</li> <li>• Carbon dioxide</li> <li>• Diatomaceous earth</li> <li>• Nitrogen gas</li> <li>• Non-synthetic baits or lures</li> <li>• Pyrethrums/Pyrethrins (does not include pyrethroids, which are synthetic and addressed in Level 4)</li> <li>• Vitamin D3 for rodent control</li> </ul> <p>Even though a substance may be allowed for pest control, it may not be approved to come into direct contact with certified organic products. It is therefore important that the operator discuss their plan and methods of using these substances with Americert prior to use. Americert allows the use of bait boxes outside the facility, if there is no risk of contamination of organic products.</p> <p>Level 3 products are most* substances which are natural and non-synthetic AND also any synthetic substance that is specifically listed in § 205.601 or 205.605 of the organic regulations. (*Natural substances listed in § 206.602 of the regulations are not permitted, including arsenic, strychnine, and tobacco dust/nicotine sulfate.)</p>	<ul style="list-style-type: none"> <li>• Must implement Level 1 and Level 2 practices first and have determined that Level 1 and 2 are insufficient to control pests, as documented through continued pest sightings</li> <li>• Must explain to certifier how the product will be used in a manner which will not lead to contamination of organic products and ingredients and receive advance approval for use</li> <li>• For Level 3 pesticides, the active ingredient must be disclosed in Module H7, and the SDS attached. Use of Level 3 substances is approved by active ingredient, not by specific product name and manufacturer.</li> <li>• Cannot be used as a preventative. If approved, can only be used in response to documented pest sightings.</li> </ul>



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<p>Level 4 Other Pesticides Not Listed in National List</p> <p>If Levels 1-3 are not effective in preventing or controlling pests, a synthetic substance not on the National List may be used, provided that the certified operator and Americert agree on the substance, method of application, and measures to be taken to prevent contamination of certified products.</p>	<p>All other synthetic substances/pesticides</p> <p>Level 4 products are anything that is synthetic and not specifically listed in the organic regulations. When in doubt, it is safer to consider a product a Level 4 substance until determined otherwise.</p> <p><b>Any active ingredient not specifically listed above as a Level 2 or 3 substance should be considered a Level 4 substance.</b></p> <p>Even though a substance may be allowed for pest control, it may not be approved to come into direct contact with certified organic products. It is therefore important that the operator discuss their plan and methods of using these substances with Americert prior to use. Americert allows the use of bait boxes outside the facility, if there is no risk of contamination of organic products.</p>	<ul style="list-style-type: none"><li>• Must implement Levels 1-3 practices first and have determined that Level 1-3 are insufficient to control pests, as documented through continued pest sightings</li><li>• Must explain to certifier how the product will be used in a manner which will not lead to contamination of organic products and ingredients and receive advance approval for use</li><li>• For Level 4 substances, the active ingredient must be disclosed in Module H7, and the SDS attached. Use of Level 4 substances is approved by active ingredient, not by specific product name and manufacturer.</li><li>• Cannot be used as a preventative. If approved, can only be used in response to documented pest sightings.</li></ul>
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