



Organic Policy Statement Organic System Plan Requirements

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REQUIREMENTS OF AN ORGANIC SYSTEM PLAN TO BE CERTIFIED UNDER THE NATIONAL ORGANIC PROGRAM

**Pertinent NOP rule sections: § 205.400
General requirements for certification;
§ 205.201 Organic production and
handling system plan.**

§ 205.400 - General requirements for certification requires that any person seeking to receive or maintain organic certification under the regulations in this part must establish, implement, and update annually an organic production or handling system plan (OSP) that is submitted to an accredited certifying agent as provided for in §205.200.

§ 205.201 Organic production and handling system plan – subsequently states that The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent.

An organic production or handling system plan must include:

- 1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;
- 2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will

be used, and documentation of commercial availability, as applicable;

- 3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented;
- 4) A description of the recordkeeping system implemented to comply with the requirements established in §205.103;
- 5) 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; and
- 6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.

The OSP is the cornerstone of organic certification. The OSP is how the producer/processor communicates to the certifying agent what is going to take place at their operation and how they will meet the requirements of the National Organic Program (NOP) rules. Since the certifying agent is typically only at the operation once per year, it is critical that the OSP is complete and accurate. Therefore the OSP must be a comprehensive description of everything to be performed at your operation in explicit detail.

During the review for initial certification, the OSP is the first impression of the operation for the certifying agent and the document the certifying agent must use to determine if the operation appears to be able to comply with the NOP rules. If it is not sufficiently detailed, the certifying agent will stop the approval process and ask for more information.

The OSP must be reflective of current practices at your operation. One of the primary components of the on-site inspection is to verify that the OSP accurately reflects the practices that are being performed. If the OSP does not accurately represent the practices that are taking place at the operation, the preliminary decision made as the result of the initial review may have been incorrect. If the on-site inspection finds discrepancies between the OSP and the actual practices being performed, at a minimum the OSP will have to be modified. It could also result in a noncompliance being issued or denial of initial certification or proposed suspension of an active certification.

The OSP is also a living document and may be modified frequently to address changes in your operation. The certifying agent understands and expects this, particularly with very complex operations. Any changes that could impact the operations ability to comply with the NOP rules must be immediately reported to the certifying agent so they can determine if the operation is still compliant with the NOP rules. Examples of changes in an operation that require immediate notification of the certifying agent include: adding a new fertility input, changing ingredients in a product and changes in animal feed suppliers. These changes must be provided in writing.

It is critical that the OSP is comprehensive, accurate and kept up to date to ensure your organic certification is not compromised.

Disclaimer: This policy statement is provided as guidance to organic producers/handlers and is not to be used a substitute for or in place of the National Organic Program rules.