



# Organic Policy Statement

## Organic Control Points

### IDENTIFYING ORGANIC CONTROL POINTS TO PREVENT COMMINGLING AND CONTAMINATION IN ORGANIC PRODUCTION AND HANDLING

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#### **Pertinent NOP Rules:**

**§ 205.201 Organic production and handling system plan**

**§ 205.272 Commingling and contact with prohibited substance prevention practice standard**

#### **Background**

The National Organic Program (NOP) regulation at 7 CFR § 205.201 requires that the OSP describe the management practices and physical barriers employed to prevent commingling of organic and nonorganic products on an organic or a split operation. Protective practices to prevent organic products from contacting prohibited substances that could compromise the integrity of the organic products are required under § 205.272.

#### **What are Organic Control Points?**

Organic Control Points (OCPs) are any point or procedure in an organic system where loss of organic integrity may occur through commingling with nonorganic product or contamination with prohibited substances.

Production and handling operations need to identify and address their commingling and contamination risks, or Organic Control Points, in their OSP. This applies to both all organic and section operations.

#### **A. Crop and pasture OCPs could include:**

1. Types of crops grown nearby (e.g. genetically modified crops)
2. Pest management material used on nonorganic farms nearby and how materials are applied (e.g. backpack, airplane, fumigation, spray)
3. Pest and weed management of adjoining public roads and areas
4. Environmental conditions, such as prevailing winds, land slope and their impact on the adequacy of buffer zones between organic and adjoining nonorganic areas.
5. Any other potential point or non-point sources of contamination.

#### **B. Livestock operation OCPs could include:**

1. Management of any livestock treated with prohibited substances
2. Origin and verification of compliance of new animals
3. Verification and compliance of off-farm feed sources, such as bales of hay and bins of grain.

#### **C. Process and handling operation OCPs could include:**

1. Sanitation and pest control management materials and practices
2. Organic and adjoining nonorganic areas
3. Reuse of boxes and transportation areas
4. Adequacy of equipment and storage unit cleaning and purging
5. Receiving inputs and ingredients

6. Transportation unit clean-out, documentation and inspection
7. Use of outside trucking services to transport organic product to market

**What steps do certified operations need to take to adhere to the NOP Rules and Policy regarding Organic Control Points?**

1. Identify: Organic or split operations must clearly describe each point or procedure where organic integrity could be compromised. Often times these are found on maps, flow charts and throughout the OSP.
2. Prevent: Establish preventive measures and specific management practices for each OCP to avoid contamination and/or commingling.
3. Address: Operations must have procedures to address Organic Control Points in their OSP.
4. Action: Corrective actions for all products which have lost organic integrity.
5. Document: Effective recordkeeping must be in place to document each step in the process which must be available for the onsite inspection or added into the OSP for review.

**What is the role of The CDA regarding Organic Control Points?**

The CDA is responsible for verifying that certified operations have sufficient management practices in place to prevent the commingling and contamination of organic products with nonorganic products and prohibited substances.

The CDA must confirm during the initial review of the OSP that the operation summarizes their risks or Organic Control Points and the risk prevention and avoidance measures implemented throughout their operation.

Organic inspectors should assess the risks and verify the adequacy and actual implementation of the described practices and procedures. Evaluation of records and on-site inspections may also include the review of nonorganic

activities and areas of the certified operation to verify compliance with the NOP regulations.

**Definitions**

*Organic Integrity*: The quality of an organic product or system which is achieved through verified adherence to organic standards from farm production through all points of handling and processing to the point of final sale to the consumer.

*Commingling*: Physical contact between unpacked organically produced and nonorganically produced agricultural products during production, processing, transportation, storage or handling, other than during the manufacture of a multi-ingredient product containing both types of ingredients.

*Organic system plan*: A management plan of an organic production and handling operation that has been agreed to by the producer or handler and the certifying agent and that includes written plans concerning all aspects of agricultural production or handling described in the Act and the regulations in the subpart C of this part.

*Split operation*: An operation that produces or handles both organic and nonorganic agricultural products.

**Additional Information on Organic Control Points can be found at:**

[www.ams.usda.gov](http://www.ams.usda.gov) USDA-NOP Guidance 5025: Commingling and Contamination Prevention in Organic Production and Handling

[www.attra.org](http://www.attra.org) ATTRA: National Sustainable Agriculture Information Service

[www.ota.com](http://www.ota.com) Organic Trade Association

[www.fda.gov/foodsafety](http://www.fda.gov/foodsafety) FDA Hazard Analysis & Critical Control Points (HACCP)