



Organic Policy Statement Record Keeping Requirements

RECORDKEEPING REQUIREMENTS FOR CERTIFIED OPERATIONS UNDER THE NATIONAL ORGANIC PROGRAM

Pertinent NOP Rules:
§ 205.103 Recordkeeping by certified operations; § 205.201 Organic production and handling system plan.

A major requirement of organic certification under the National Organic Program (NOP) is the maintenance of all records related to organic production and handling. These records must be available during an inspection and must be easily understood. An audit of your records will be conducted during an organic inspection to verify certification requirements have been followed. Complete and accurate records must be kept that track the organic products from seed to harvest, or from receiving through final sale and shipping. It is critical that an organic operation set up a comprehensive record keeping system prior to seeking certification.

The NOP rules state:

§ 205.103 Recordkeeping by certified operations.

- a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)).”
- b) Such records must:
 - 1) Be adapted to the particular business that the certified operation is conducting;

- 2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;
 - 3) Be maintained for not less than 5 years beyond their creation; and
 - 4) Be sufficient to demonstrate compliance with the Act and the regulations in this part.
- c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.

§ 205.201 which provides requirements for what must be in the organic production and handling system plan states in part(a)(4); that the operation must provide a description of the recordkeeping system implemented to comply with the requirements established in §205.103. This provides the certifying agent with the types of records that the operations keeps as well as the form they are kept in (paper, electronic, etc.). Computer records are acceptable as long as they can be viewed by the inspector and copies made if needed.

Insufficient recordkeeping is one of the most common problems of operations wanting to begin or continue their organic certification. If the records don't fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited certification cannot be granted or continued. Since the certifying agent cannot be continually on site to observe activities this is the

primary means of verifying compliance with the Act and rules.

Operations that are involved in both organic and nonorganic activities have a particularly critical need for excellent recordkeeping. These operations generally have inputs, ingredients, cleaning materials, etc. that are prohibited in organic products. The operation must have excellent records of both the organic and nonorganic production activities. During the audit, the inspector will ask to see documentation of use of prohibited inputs to verify they were not used in organic production. The documentation must verify that amounts purchased equal the amounts used, minus quantities still on hand. The world wide web has a huge number of examples of recordkeeping forms for every type of record that needs to be kept for organic certification. Generally these can be easily adapted to any specific operation.

The more organized your records are when the inspector arrives the less time that will be required to conduct the inspection and audits. Remember the records must fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited

By providing all of these records during the certification process, some operations are rightfully concerned with the confidentiality of the information. However, certifying agents are held to strict requirements to maintain any business-related information confidential and to not disclose it to third parties.

Additional Information on Organic Recordkeeping can be found at:

Organic Regulation, Certification, Transition & History
<http://www.attra.ncat.org/organic.html#overview>

NCAT's Organic Crops Workbook
<http://newattra.ncat.org/attra-pub/PDF/cropsworkbook.pdf>

Organic Field Crops Documentation Forms
<http://www.attra.ncat.org/attra-pub/cropforms.html>
<http://www.attra.ncat.org/attra-pub/PDF/cropforms.pdf>

Organic Orchard, Vineyard, and Berry Crop Documentation Forms
<http://www.attra.ncat.org/attra-pub/orchardforms.html>
<http://www.attra.ncat.org/attra-pub/PDF/orchardforms.pdf>

Creating an Organic Production & Handling Systems Plan: A Guide to Organic Plan Templates
<http://www.attra.ncat.org/attra-pub/handlingsys.html>

Organic Farm Plan <http://www.attra.ncat.org/attra-pub/organicfarmplan.pdf>

Organic Farm Plan Update
<http://www.attra.ncat.org/attra-pub/organicfarmplanupdate.pdf>

Organic Handling Plan
<http://www.attra.ncat.org/attra-pub/organichandlingplan.pdf>

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.