

Organic Handling Plan for Traders/Brokers/Importers

Complete this plan if you are requesting organic certification for product produced for you at a certified copacker or for product that you relabel or resell without processing or repackaging. If you repackage or process products in any way, fill out the Organic Handling Plan.

Note: the sections of this plan are not sequential because this plan omits sections of the Organic Handling Plan that do not apply to traders, brokers, or importers. See the Application Checklist for any additional documentation and forms needed.

SECTION 1: General Information			205.201, 205.401	
Applicant/company name:		Date:		Organic certification number:
Owner:	Primary Contact for certification:		Primary Contact's Numbers (office/mobile):	
Primary Contact's Email Address:			Company Website:	
List Other Authorized Contacts with their Titles and Contact Information (email/phone number):				
Mailing Address:		City:	State/province:	Postal/zip code:
Physical Address:		City:	State/province:	Postal/zip code:
Legal status: <input type="checkbox"/> Sole proprietorship <input type="checkbox"/> Corporation <input type="checkbox"/> Cooperative <input type="checkbox"/> Trust or non-profit <input type="checkbox"/> LLC <input type="checkbox"/> Legal partnership (federal form 1065) <input type="checkbox"/> Other (specify)				
Year company began:		Number of employees:		
1-1. Please list the federal, state and/or municipal licenses and registrations you must carry for food handling:				
Do you have a copy of the Baystate Program Manual or a copy of the current organic standards? <input type="checkbox"/> Yes <input type="checkbox"/> No				
1-2. What general categories of organic products are handled or planned to be handled? <i>Provide a complete list of products requested for certification in Section 2: Product Composition and Labeling.</i>				
<input type="checkbox"/> I have attached a separate list of all organic products for certification				
1-3. Preferred time for inspection visit: <input type="checkbox"/> Morning <input type="checkbox"/> Afternoon <i>Fill out Direction Sheet and attach to this application.</i>				
1-4. Type of operation (i.e. distributor, brand owner, broker, etc.):		Is your operation: <input type="checkbox"/> Primary <input type="checkbox"/> Contract vendor		Estimated annual total production % organic % nonorganic
1-5. List additional buildings and locations:				
Address		City		State
1-6. If you use co-packers or contract vendors, give the following information:				
Name of Co-Packer or Contract Vendor	Address		Phone No.	Certified By
1-7. List or attach a list stating the general categories of nonorganic products produced by your company.				

There are four categories of organic products: "100% Organic", "Organic", "Made with Organic (specified ingredients or food group(s))", and products with less than 70% organic ingredients. The % of organic ingredients is calculated by dividing the total net weight or volume (excluding salt and water) of combined organic ingredients by the total weight or volume of all ingredients (excluding salt and water). All ingredients identified as "organic" in the ingredient list must be certified organic. Ingredients sourced from non-certified exempt or excluded operations must not be identified or used as organic ingredients.

Products labeled "100% organic" must contain 100% organic ingredients, including any processing aids. Products labeled "organic" must contain at least 95% organic ingredients; nonorganic ingredients must not be commercially available in an organic form; and all synthetic ingredients and processing aids must be on the National List. Products labeled "made with organic (specified ingredients or food group(s))" must contain at least 70% organic ingredients. For "100% organic," "organic," and "made with ..." products, both organic and nonorganic ingredients must not be produced using excluded methods, sewage sludge, or ionizing radiation. Products labeled "organic" or "made with..." must not include organic and nonorganic forms of the same ingredient, except that a nonorganic ingredient in a product labeled "made with..." may contain organic and nonorganic forms of the same ingredient, but the ingredient must not be labeled as "organic" on the ingredient statement or be counted in the calculation of the product's organic percentage. Products with less than 70% organic ingredients can only identify organic ingredients in the information panel. Refer to Section 205.605 and 205.606, to determine which nonagricultural substances and nonorganically produced agricultural ingredients are allowed in or on products labeled "organic" or "made with..."

The Organic Standards have specific requirements for principal display panel information relating to the use of the term "organic", depending on the % of organic ingredients in the finished product. For all products, organic ingredients must be identified in the ingredient information panel. Up to three ingredients or food groups can be listed on the principal display panel for products labeled as "made with organic (ingredients or food group(s))". The term "organic" cannot be used to describe a nonorganic ingredient in a product name. Water and salt cannot be identified as "organic". The name of the certifying agent must be identified on the information panel below the name of the handler or distributor, preceded by the statement, "Certified organic by..." or similar phrase. The address and telephone number of the certifying agent may be displayed.

The USDA seal can be used on "100% organic" or "organic" products, but not on products labeled "made with...". Baystate Organic Certifiers seal or logo can be used on "100% organic," "organic" or "made with...". Products with less than 70% organic ingredients cannot use either the USDA seal or BOC's seal or logo. Baystate Organic Certifiers seal cannot be displayed more prominently than the USDA seal. Use of either the USDA or BOC's seal is voluntary and not required by the NOP.

Attach a Single Ingredient Product Profile to list all single ingredient products and/or an Organic Product Profile for each multi-ingredient product requested for certification. Include examples of all labels used for each product.

2A. Products Labeled as "100% Organic" None

(All ingredients are certified to 100% organic, including processing aids.)

2A-1. List all products labeled or planned to be labeled as "100% Organic" and check the appropriate boxes.

Name of Product	Non-Retail Product? (Yes or No)	Organic Ingredients Identified in the Information Panel (Yes or No)	Baystate Identified on Label? (Yes or No)	USDA Seal on Label? (Yes or No)	Baystate Seal on Label? (Yes or No)

2B. Products Labeled as "Organic" (at least 95% certified organic ingredients) None

2B-1. List all products labeled or planned to be labeled as "Organic" and check the appropriate boxes.

Name of Product	Non-Retail Product? (Yes or No)	Organic Ingredients Identified in the Information Panel (Yes or No)	Baystate Identified on Label? (Yes or No)	USDA Seal on Label? (Yes or No)	Baystate Seal on Label? (Yes or No)

SECTION 2. Labeling and Product Composition (cont.)

2B-2. Are any nonorganic agricultural ingredients used in products labeled as “Organic”? Yes No

If yes, list all organic products which contain nonorganic agricultural ingredients:

If yes, are these ingredients listed in section 205.606 of the standards? Yes No

Submit a list of all sources checked for the organic ingredient, the results of your search, and the contact information for the source for each non-organic agricultural ingredient not available as organic.

For every non-organic agricultural ingredient used, I have attached proof that I searched for the ingredient organically.

Yes No N/A

2B-3. Do any products labeled “organic” show the percentage of organic ingredients on the label? Yes No

If yes, list all products so labeled.

Does the size of the percentage statement exceed one-half the size of the largest font size on the panel on which the statement is displayed? Yes No

Does the percentage statement appear in its entirety in the same font size/style/color without highlighting? Yes No

Is the percentage rounded down to the nearest whole number? Yes No

2C. Products Labeled As “Made with Organic (Specified Ingredients or Food Group or Groups)” None
(At least 70% certified organic ingredients; up to 3 ingredients or food groups can be listed, see Section 20.304 of the standards)

2C-1. List products to be labeled “Made with Organic (ingredients or food group(s))” and check the appropriate boxes.

Name of Product	Non-retail Product? (Yes or No)	Number of Ingredients or Food Groups Identified in the Made with Organic Statement?	List Each Ingredient or Food Group ¹ Identified as Organic on the Principal Display Panel	Organic Ingredients Identified as Organic in the Information Panel? (Yes or No)	Baystate Identified on Label? (Yes or No)	Baystate Seal on Label? (Yes or No)

2C-2. Does the "made with organic" statement on the principal display panel exceed one-half the size of the largest font size on the panel? Yes No

2C-3. Does the "made with organic" statement on the principal display panel appear in its entirety in the same font size/style/color without highlighting? Yes No

2C-4. Does any “made with organic” packaging show the percent of organic ingredients in the product? Yes No

If yes, is the percentage statement font size larger than half of the largest font on the display panel? Yes No

Does the percentage statement appear in its entirety in the same font size/style/color without highlighting? Yes No

Is the percentage rounded down to the nearest whole number? Yes No

2D. Products with Less Than 70% Organic Ingredients (organic ingredients listed only on the information panel)

2D-1. List all products which contain less than 70% organic ingredients: None

2E. By-Products

2E-1. Will any by-products from certified organic products be sold as certified organic? Yes No N/A

If yes, list all organic products manufactured from by-products:

List each organic by-product on a Single Ingredient Product Profile.

¹ Choose from the following listings: beans, fish, fruits, grains, herbs, meats, nuts, oils, poultry, seeds, spices, sweeteners, vegetables, or processed milk products
 Organic Handling Plan – Trader/Brokers/Importers 3.4

The Organic Standards require handling practices and procedures present no contamination risk from commingling with non-organic products or contact with prohibited substances. Packaging materials and storage containers must not have contained synthetic fungicides, preservatives or fumigants. Reusable containers must be clean and pose no risk to the integrity of organic products. Procedures used to maintain organic integrity must be documented.

3A. PRODUCT FLOW

Attach a complete written process flow description showing the movement of organic products from ingredient and/or product purchase through storage, relabeling (if applicable), shipment to the co-packer (if applicable) and shipment from copacker to storage (if applicable) to shipment to customers. All locations where ingredients and products pass through must be identified. The description must show each step, the frequency of each activity and any records kept. All equipment and storage areas must be identified. Include a flow chart demonstrating this if needed.

I have submitted a written Process Flow Description and/or Flow Chart for my organic production: Yes No

3B. ORGANIC INTEGRITY

3B-1. Do you have an organic integrity plan in place to address areas of potential commingling of organic and non-organic ingredients and/or contamination of organic ingredients by prohibited substances? Yes No

If yes, have you submitted a copy of your organic integrity plan? Yes No

If no, when will that plan be implemented?

3C. MONITORING

The Organic Standards requires organic operations describe the monitoring practices and quality assurance steps they intend on taking are being followed and implemented.

3C-1. Do you have a Quality Assurance program in place? Yes No

If yes, what program do you use? ISO HACCP TQM other (specify)

3C-2. Are any outside quality assessment services used (e.g. AIB)? Yes No

If yes, name of company:

3C-3. Do you arrange for any ingredient testing for pesticide residues or GMOs? Yes No

If yes, include test results with your application.

3C-4. In your products to be certified, if you use non-organic ingredients, how do you prevent the use of ingredients produced using excluded methods (genetic engineering), sewage sludge, or ionizing radiation? (Check all that apply)

GE testing letters from manufacturers other (specify)

3C-5. Are ingredient samples retained? Yes No

If yes, how long?

3C-6. Are finished product samples retained? Yes No

If yes, how long?

3C-7. Do you have a product recall system in place? Yes No

Describe the last product recall you performed.

3C-8. How do you monitor the implementation of your organic system Plan, including recording the frequency of your monitoring? (Check all that apply.)

Updating of certification certificates for organic ingredients Annually other (specify)

Updating compliance documentation for non-organic ingredients Annually other (specify)

Updating of Organic Handling Plan and Profiles Annually other (specify)

Conducting Ingredient Inventory Annual Twice a year Monthly other (specify)

Conducting Finished Product Inventory Annual Twice a year Monthly other (specify)

Pest control monitoring internal Daily Weekly Monthly other (specify)

Do you keep records of your internal pest control monitoring? Yes No

Pest control monitoring by outside contractor Daily Weekly Monthly other (specify)

Do you have records of the activities of your pest control contractor? Yes No

Auditing your own recordkeeping Annually Monthly other (specify)

Do you keep records of your internal audits? Yes No

QA or supervisory checks on procedures Daily Weekly Monthly other (specify)

Do you keep records of QA Supervisory Checks? Yes No

Mock Product Recalls Annually Monthly other (specify)

Do you keep records of your mock product recalls? Yes No

Other Annually Monthly other (specify)

Describe records being kept:

3H. TRANSPORT OF ORGANIC PRODUCT

INCOMING PRODUCT Not Applicable

3H-1. In what forms are incoming ingredients received? dry bulk liquid bulk tote bags tote boxes
 metal drums cardboard drums paper bags foil bags other (specify)

3H-2. Are all incoming organic ingredients packaged so they can't be contaminated in shipping? Yes No N/A

3H-3. Are bulk shipments of organic ingredients palletized on their own pallets or shipped on their own trucks or in their own bulk containers? Yes No N/A

3H-4. Do you maintain a receiving record that shows that all organic ingredients were received in good condition and were not damaged or contaminated in shipment? Yes No

3H-5. Do you arrange incoming ingredient transport? Yes No
If yes, have transport companies been notified of organic handling requirements? Yes No

3H-6. Are transport units used to carry nonorganic ingredients or prohibited substances? Yes No
If yes, how do you ensure that inbound transport units are cleaned prior to loading organic products?

Is the inspection/cleaning process documented? Yes No

3H-7. Are organic ingredients shipped at the same time as nonorganic in the same transport units? Yes No
Check all steps taken to segregate organic products: organic product sealed in impermeable containers
 separate pallets pallet tags labeled "organic" organic product shrink-wrapped
 separate area in transport unit other (specify)

OUTGOING FINISHED PRODUCT

3H-8. In what form are finished products shipped? dry bulk liquid bulk shrink wrapped pallets
 other (specify)

3H-9. Are all outgoing products shipped in packaging and packed in cases so that the finished products cannot be contaminated or commingled during shipment? Yes, skip to next section. No

3H-10. How are outgoing products transported?

3H-11. Do you arrange outgoing product transport? Yes No N/A
Have transport companies been notified of organic handling requirements? Yes No

3H-12. Are transport units used to carry nonorganic products or prohibited materials? Yes No N/A
If yes, how do you ensure that outgoing transport units are cleaned prior to loading organic products?

Is the inspection/cleaning process documented? Yes No

3H-13. Are organic products shipped at the same time as nonorganic in the same transport units? Yes No N/A
Check all steps taken to segregate organic products: organic product sealed in impermeable containers
 separate pallets pallet tags labeled "organic" use shrink-wrap separate area in transport unit
 other (specify)

The Organic Standards require records disclose all activities and transactions, be maintained for 5 years, and demonstrate compliance with the NOP Rule. Organic ingredients must be verified as certified organic. Products must be tracked from receipt of incoming ingredients to sale of finished products. Finished product amounts must balance with organic ingredients purchased. All relevant documents must identify products as "organic", and all records must be accessible to the inspector.

5-1. Which of the following records do you keep for organic processing/handling?

INCOMING:

- purchase orders contracts invoices bills of lading Certificates of Analysis Transaction Certificates
 receiving records scale tickets Organic Certificates verification ingredients not produced using sewage sludge
 customs forms quality test results receipts verification ingredients produced/handled without ionizing radiation
 commercial availability documentation for nonorganic ingredients in "organic" labeled products NOP import certificates
 fumigation at port of entry records non-GMO ingredients verification phytosanitary certificates
 other (specify)

5-2. Are you purchasing from a non-certified distributor? Yes No

If yes, list non-certified distributors:

Do your records indicate the certified source of the ingredient purchased from the non-certified distributor? Yes No

IN-PROCESS: Not Applicable

- ingredient inspection forms blending reports production report/batch sheet equipment clean-out logs
 packaging reports sanitation logs QA reports production summaries (12 mos.) other (specify)

STORAGE:

- ingredient inventory reports finished product inventory reports other (specify)

OUTGOING:

- shipping log purchase orders sales orders/invoices transport unit inspection forms bills of lading
 scale tickets Organic Certificates export declaration forms Transaction Certificates sales summary log
 phytosanitary certificates shipping summary log audit control register complaint log other (specify)

5-3. Lot number tracking of ingredients is required by the organic standards. List out the points in your recordkeeping where the lot numbers are documented (purchase, receiving, production, storage, etc.):

5-4. Describe your lot numbering system for finished products:

5-5. The organic standards require non-retail (master or wholesale) cases used to pack or store product to have lot numbers for organic products. If you use master cases, are lot codes on them? Yes No N/A

5-6. Can your recordkeeping system track each lot of finished product back to the certified supplier's lot number for each lot of ingredient or incoming product used? Yes No

5-7. Can your recordkeeping system balance quantities of organic ingredients or incoming products in with quantities of finished products out? Yes No

5-8. How long do you keep your records? *(The Organic Standards require records be kept for 5 years.)*

SECTION 6: Certification Status, Canadian Equivalency, and the Export and Import of Products and Ingredients

Has this operation, or a responsible party (owner, manager) connected to this operation, ever previously held organic certification? Yes No

List previous years certified organic and name of accredited certifying agency:

List current organic certification by other accredited certifying agencies:

Has organic certification ever been denied, suspended, or revoked? Yes No n/a

If yes, describe the circumstances and attach a list of all non-compliances noted by the certifying agent issuing the decision, and corrective actions you took to address the non-compliances:

I have attached non-compliances and corrective actions.

If you were ever certified, or are currently certified, by another agency, submit your last certificate issued, the last post-inspection letter received, any non-compliances cited, and corrective actions you took to fix the non-compliances.

I have attached non-compliances and corrective actions.

I have attached current certification certificate, and last post-inspection letter.

Do you plan on shipping any of your finished organic products to Canada? Yes No

If yes, do you have proof that all USDA/NOP compliant organic agricultural ingredients have not been produced hydroponically and have been produced without using Sodium (chilean) nitrate and that all livestock products have been produced according to the terms of the US-Canada Organic Equivalency Arrangement? Yes No

If yes, list all products you intend on shipping to Canada. You may attach as separate list of products shipping to Canada:

Do you plan on accompanying shipments to Canada with a full copy of your Certification Certificate which includes the statement "Certified in accordance with the terms of the US-Canada Organic Equivalency Arrangement"? Yes No

Explain any special circumstances:

The National Organic Program requires adherence to various international arrangements concerning the trade of organic feed, ingredients and finished products. Specific documentation is required to be obtained with each shipment into, or out of, the US. Organic products must be able to be tracked from the source to the destination, and all products must be verified as certified organic. All relevant documentation must be collected in a timely manner and records of incoming and outgoing shipments must be accessible to the certifier and inspector.

Do you plan on using ingredients, raw materials, feed, processing aids, etc. that have been imported from any foreign country/region? Yes No

If yes, please list all ingredients/materials and all source location(s):

Are you the direct importer for these ingredients and materials? Yes No

I have retained all documentation received with each shipment, including the following (specify):

Are you using an organic certified importer(s)/distributor(s)? Yes No

I have the distributor(s) current organic certificate documentation.

If you are importing ingredients, feed, or finished products from any foreign country/region, import documentation completed by the appropriate certifying agency is required. Do you retain the proper import documentation showing everything imported from any of these countries has been approved by the correct certifying agency? Yes No

If you are importing product through an uncertified distributor, confirm that you are obtaining and keeping the proper import documentation on file. Yes No

If you are importing ingredients, feed, or finished products from any other foreign country/region that may be subject to phytosanitary screening, do you verify that they have not been treated with a prohibited substance at the port of entry? Yes No

Do you plan on shipping/exporting finished products to any foreign country/region except Canada? Yes No

If yes, please list all export destinations for your product:

If yes, list all products that you plan on exporting and their respective country or countries of export. You may attach a separate list of products with their respective destinations:

If yes, list the documentation sent with each shipment.

Are you in compliance with the requirements for exporting organic products covered by Equivalency Trade Arrangements? (For a full list of these Arrangements see our Program Manual) Yes No

If yes, describe how you are in compliance.

I affirm that all statements made in this application are true and correct. I understand my facility may be subject to inspection and/or residues sampling at any time deemed appropriate to ensure compliance with the Organic Foods Production Act of 1990 and NOP Rules and Regulations. I understand acceptance of my application for organic certification in no way implies granting of certification by Baystate Organic Certifiers. I agree to provide further information as required by Baystate Organic Certifiers.

Furthermore, I agree to abide by the following general requirements for certification as specified in section 205.400 of the National Organic Standards. A person seeking to receive or maintain organic certification must:

1. Comply with the Organic Food Productions Act and all applicable regulations specified in the National Organic Standards and with all Baystate Organic Certifiers certification requirements as outlined in the Program Manual.
2. Establish, implement, and update annually an organic production or handling system plan that is submitted to Baystate Organic Certifiers.
3. Permit on-site inspections by Baystate Organic Certifiers with complete access to the production or handling operation, including noncertified production and handling areas, structures, and offices.
4. Maintain all records applicable to the organic operation for not less than 5 years beyond their creation and allow authorized representatives of the Secretary of Agriculture, and Baystate Organic Certifiers access to such records during normal business hours for review and copying to determine compliance with the Organic Food Productions Act and all applicable regulations specified in the National Organic Standards.
5. Submit applicable fees according to the Baystate Organic Certifiers' Fee Schedule.
6. Immediately notify Baystate Organic Certifiers concerning any application, including drift, of a prohibited substance to any field, production unit, site, facility, livestock, or product that is part of an operation; and notify Baystate of any change in a certified operation or any portion of a certified operation that may affect its compliance with the Act and the regulations in this part.
7. Submit all labels used to market organic produce, meat, or products to Baystate Organic Certifiers for review and approval prior to using these labels to market the produce, meat, or products.

Signature of Owner/Manager: _____ Date _____

I have made copies of this Organic Handling Plan and other supporting documents for my own records.

Application forms may be emailed to: applications@baystateorganic.org.

Submit copies, fees, and supporting documents to:

Baystate Organic Certifiers, c/o Don Franczyk, 1220 Cedarwood Circle, N. Dighton, MA 02764