



Operation Name: _____ Date: _____

- ▶ Certified operations must maintain records that fully disclose all activities and transactions in enough detail to be readily understood and audited. These records must be available for review at inspections.
- ▶ Records must span the time from production (or purchase or acquisition from the last certified operation) to sale or transport to the next certified operation and must be traceable back to your operation.
- ▶ Records should be sufficient to demonstrate compliance with organic regulations and kept for at least five years.

A. Location of Records

Location where all organic records can be reviewed during inspection. If identical to the physical location address provided on your [CCOF Certification Contract](#). Identical to physical location address on contract.

Address: _____

City: _____ State/Province: _____ Zip/Postal Code: _____ Country: _____

Contact(name/title): _____

Phone: _____ Fax: _____ Email(s): _____

B. Required Records

1) Based on the activities described in your Organic System Plan (OSP), does your operation:

- Maintain all records needed to verify compliance, and
- Keep these records for at least 5 years, and
- Make them available during inspections?

Yes, my operation does the above.

Records needed to verify compliance include, but are not limited to, the records listed in the table below:

The table below lists activities that may pertain to your operation. For each activity below, ensure that the indicated records are maintained that correspond with your operation's practices. Sample record-keeping forms can be located at [the NOP's website and https://www.ccof.org/page/recordkeeping-tools](http://theNOPswebsiteandhttps://www.ccof.org/page/recordkeeping-tools).

If you do this:	Maintain this type of record:
Purchase: <ul style="list-style-type: none"> • organic feed • feed supplements • organic roughages to be used for bedding 	<ul style="list-style-type: none"> • Purchase records (e.g. receipts, invoices, weight tags, and shipping documents) • Documentation must demonstrate that the transaction occurred directly between two certified operations. If sourcing from an uncertified (exempt) operation, records linking back to the last certified operation in the supply chain. (Uncertified operations must be approved by CCOF). • Organic certificate for the supplier(s) • Labels for all purchased feed and feed supplements
Store organic feed	<ul style="list-style-type: none"> • Inventory records for feed produced on-farm and for purchased feed • Current organic certificates for offsite storage operations
Make changes to the approved feed ration	<ul style="list-style-type: none"> • Feed amounts as fed that identify specific commodities, the quantity provided, and to how many animals
Graze ruminant livestock	<ul style="list-style-type: none"> • Pasture access records (e.g. rotational grazing documentation) • Calculations showing Dry Matter Intake from pasture for all production groups • The start and end of your grazing season
Temporarily confine livestock for allowed reasons	<ul style="list-style-type: none"> • Document each period of temporary confinement and list animal(s) confined, start and end date(s) of confinement, reason(s) for confinement, and weather data for all dates of confinement (if applicable)
Raise replacement animals on-farm	<ul style="list-style-type: none"> • Birth and/or hatching records
Purchase new animals	<ul style="list-style-type: none"> • See form: New Livestock Application for a description of records that must be maintained.
Administer health care materials to organic animals	<ul style="list-style-type: none"> • Health care treatment logs, including vaccination records • Health care and veterinary product purchase records
Raise a herd of ruminant animals	<ul style="list-style-type: none"> • Herd list including birth date, traceability to dam and/or purchase information, transitional status, organic slaughter eligibility status



If you do this:	Maintain this type of record:
Have nonorganic breeder stock on-site	<ul style="list-style-type: none"> Breeding and birthing records that demonstrate the dates of the progeny's last third of gestation Transportation records with the date nonorganic breeder stock arrived on-site All applicable records to demonstrate the breeder stock were managed organically during their progeny's last third of gestation through nursing of their offspring, including confinement records, medical treatment records, feeding and grazing records, and weaning records
Transport organic animals or products	<ul style="list-style-type: none"> Transportation records that include the location of pick-up, number of animals, total travel time on vehicle, and delivery to destination. If applicable, verification that commingling of certified organic animals was prevented during transport (e.g. animal identification records) Records indicating the organic status of livestock in a shipment
Produce organic product (e.g. eggs, milk)	<ul style="list-style-type: none"> Production log showing date and quantity of product produced (ex: quantity of eggs or milk) Cleaning logs and SOPs for product handling (e.g. egg washing), facility equipment cleaning, and other handling activities as applicable.
Sell livestock and/or livestock product, even if not sold as organic	<ul style="list-style-type: none"> Shipping or sales records (e.g. delivery receipts, receiving documents, Farmers' Market load lists, etc.) Contracted and/or sales value for livestock and/or livestock products
Contract with another certified operation for processing	<ul style="list-style-type: none"> Organic certificates for certified handlers you use to process product that you own (e.g. slaughter, cut and wrap operations) Records documenting when and how much product was provided to you, e.g. invoices and shipping records. (You are not required to request production logs from your co-packer).

C. Audit Trail

An audit trail is a set of documents that tracks all activities occurring from **origin** through **sale/transfer of ownership** of organic livestock and their products and is sufficient to trace organic products back to their production (eggs tracing to a flock, milk tracing to a herd). Per NOP §205.2, an audit trail consists of documentation that is sufficient to determine the source, transfer of ownership, and transportation of any agricultural product labeled as organic.

Audit trail records must contain linking elements to trace organic products back to their source or the certified organic supplier if sourced from another operation. Audit trail records must identify livestock/products as organic.

- 1) Attach a sample audit trail showing how you plan to meet the audit trail requirements above.
 - Highlight or clearly mark the linking elements to show how the documents connect in sequence.
 - Show how you will identify the organic status of the livestock/product(s) on each type of document.
 - For nonretail containers that move through the supply chain (from your operation to the next operation): indicate where in your audit trail system the nonretail container's lot number, shipping identification, or other unique identification will appear.
 - **Even if you are new to organic production, you must provide an example of the audit trail records you plan to maintain.**
- Sample audit trail attached.



2) In the table below, describe the lot numbering used to link to your audit trail and track organic products once they leave your operation.

Not applicable, no lot numbering used. Other unique identifier, (such as individual animal ID), is used. Describe below (or state where this is described elsewhere in your OSP):

My operation assigns lot numbers prior to shipment to next operation (e.g. uncertified (exempt) handler, certified organic buyer or handler). Describe your lot numbering system:

EXAMPLE: Lot Number: 23123010				
Code	23	123	0	10
Signifies	Year: 2023	Julian date: Egg Harvest	Organic	Flock ID

Lot Number:				
Code				
Signifies				

D. Split Operation Record Keeping

A split operation is an operation that produces or handles both organic and nonorganic animals &/or products.

1) Mark all of the following that apply to your operation:

- Raise both organic and nonorganic livestock of different species
- Raise **animals of same species** organically and nonorganically
- Sell organic and nonorganic livestock/products, including any that you source from other operations
- Sell **identical** organic and nonorganic livestock/products, including any that you source from other operations
- None of the above, I solely raise organic animals and have organic livestock products. Skip to Section E.

2) How do your production and transaction documents distinguish between organic and nonorganic livestock/products? (Examples include health care treatments, purchase and sales records, transportation records, etc.)

E. Monitoring & Fraud Prevention

Organic fraud is the deceptive representation, sale, or labeling of nonorganic agricultural products as organic.

You must implement practices and procedures to effectively monitor and verify the organic status of livestock/products you produce or source, to prevent organic fraud. The scale and scope of your fraud prevention plan should reflect the complexity of your activities. See our [CCOF Organic Fraud Prevention Plan](#) worksheet for more details. CCOF may request that you complete Handler OSP forms and/or a [CCOF Organic Fraud Prevention Plan](#) worksheet if indicated by the complexity of your activities.

1) Mark all of the following that apply:

- a) My operation purchases certified organic animals and/or animal products.
Describe animal purchasing activities in [L6.0 Origin of Livestock](#) and [L6.1 Livestock Suppliers](#). Ensure [L7.1 Suppliers](#) describes products purchased for reselling/brokering.
- b) My operation purchases certified organic feed and/or roughages for bedding (packaged in retail packaging and/or unpackaged/bulk feed).
Describe activities in [L7.1 Suppliers](#).
- c) My operation sends certified organic feed and/or products to another operation for storage.
Describe activities in [L8.1 Storage for Livestock Producers](#).
- d) My operation sends certified organic animals to other operations for custom grazing and/or management.
Describe activities in a [Custom Grazing and Management Affidavit](#).
- e) My operation packs into brands/labels owned by other certified operations (e.g. eggs).
Describe activities in [L7.0 Labeling](#).
- f) None of the above. **Stop, this form is complete.**



- 2) For each of the scenarios you indicated in question 1, how do you verify current organic status?

Certificates must be current (issued within the last 15 months) and complete (listing the product sourced or produced/handled, with brand, if any). Records must link back to the last certified organic operation, and source of the animal as applicable to determine the eligibility of the animal(s) purchased.

- My [G8.0 Record Keeping](#) describes my complete activities for verifying organic status of operations I work with.
- Current organic certificate reviewed with each shipment or transaction.
- Certificate reviewed periodically, indicate frequency: Monthly Quarterly Annually
- Other (describe): _____

- 3) How do you monitor the effectiveness of your certificate verification practices and procedures?

Should you suspect organic fraud please visit: www.ccof.org/faq/how-do-i-address-organic-complaints-and-problems-marketplace.

- My [G8.0 Record Keeping](#) describes my complete activities for ensuring my monitoring practices are effective.
- Standard procedure requires sign-off from more than one employee for each transaction.
- Periodic review of records for quality control.
- Other (describe): _____

- 4) What is your process for reporting credible evidence of organic fraud? Select all that apply:

- Report to [CCOF](#)
- Report to supplier's [certifying agent](#)
- Report to USDA [NOP](#)
- Report to California Department of Food and Agriculture (CDFA) [State Organic Program](#) for operations in CA
- Other (describe): _____

- 5) Attach a map of your supply chain, beginning with the certified operations before you in the supply chain (operations you buy from) and ending with certified operations that you sell or ship organic products to. Consider the following:

- a) Certified organic animals, feed, and/or products received by your operation from outside sources.
- b) Off-farm storage locations
- c) Off-farm processing/post-harvest handling facilities and activities
- d) Destination of animals/products: when ownership changes, to whom items are sold.
- Supply chain map attached.