Organic Handler Certification Support Package

This packet was created to help you find resources, understand certification issues, maintain compliance with organic standards, and ensure your continued certification with CCOF. It contains information about the organic certification process, answers to common questions, and sample forms to assist you with meeting record keeping requirements. The sample forms can be copied and included as part of your Organic System Plan (OSP) and/or used throughout the year and made available at your inspection for review. Feel free to adapt them as necessary to meet the specifics of your operation.

Basic requirements for Processor/Handler certification

Organic certification is like links in a chain. Every step, from farm to table, must be included in a certified link.

In Processor/Handler certification both a product and the facility within which it is processed, packaged, or labeled must be certified. This may all be done under a single certification or fall into a number of different certification links, e.g., product owner, co-packer, distributor, etc.

There are two primary levels of certification for processed products:
• In order to carry the USDA logo at least 95% of the ingredients in a product must be certified organic and uncertified ingredients must be specifically allowed under the National Organic Program standards.
• Products that contain 70% to 94% certified organic ingredients and don’t contain any ingredient prohibited certified organic products can be certified, and will carry their certifier’s logo but not the USDA logo.

The USDA NOP has specific labeling requirements for both of these levels of certification. You can find those requirements in the Organic Labeling Flyer in this support packet.

For a facility to be certified to process, package, or label organic products it must have policies, practices, and procedures in place to ensure there is no comingling or cross-contamination with any non-certified ingredient or material from the time the individual ingredients are received until the final product is fully processed and packaged.

Contents:

1. Certification Tips for Success
2. Develop Compliant Organic Labels
3. Organic Labeling Flyer
4. Frequently Asked Questions (FAQ) For more information see www.ccof.org/faqs
   • How much does organic certification with CCOF cost?
   • How do I control certification costs?
   • How long does organic certification take?
   • What is the Organic System Plan (OSP)?
   • Why do I need an Organic Inspection?
   • Where can I find organic ingredients for my products?
   • What is the “National List” for processed products?
   • What non-organic ingredients/materials can I use in or on my organic product?
   • Can I make a certified organic product in an uncertified facility?
   • I process organic and non-organic products. What additional measures do I need to take?
   • What cleaners or sanitizers can I use?
   • How do I control pests in my facility?
   • What is an audit trail?
   • How can I prepare for the audit trail portion of my inspection
   • What is a lot number?
5. Organic Consultants
6. Recordkeeping Tools
   • Equipment Cleaning Log
   • Agricultural Ingredient Commercial Availability Search Record
   • Pest Control Material Usage Justification Letter
   • Sample Audit Trail (Invoice, Batch Record, Bill of Lading, Monthly Inventory)

Updated September 2019
Organic Processors/Handlers

CERTIFICATION TIPS FOR SUCCESS

Notify CCOF of changes to your Organic System Plan that may affect compliance.

Organic System Plan (OSP) changes may include new locations, labels or products, types of processing, application of prohibited substances, or positive residue tests. Submit changes to processes, procedures, or practices where you are unsure if you are meeting organic standards by updating your forms or contacting us. Minor updates can be made at inspection. Search for OSP forms at www.ccof.org/documents.

(NOP § 205.400)

Keep organic certificates for approved suppliers onsite.

Remember to look for:

» An issue date from within the last year
» Reference to “NOP” or “USDA organic standards”
» A current “profile” or “summary” listing specific products and brands, if applicable

(NOP § 205.201; 205.404; 205.406(d))

Always submit labels for review before printing.

Use CCOF’s helpful labeling tools:
www.ccof.org/documents/develop-compliant-organic-labels
www.ccof.org/documents/organic-labeling-guidelines

(NOP § 205 Subpart D)

Record all organic activities and keep documents for at least five years.

Your inspector will review your records to verify purchases, production, and sales that demonstrate compliance with organic standards.

(NOP § 205.103)

See other side for grower/producer tips »
ORGANIC LABELING GUIDELINES

For All Labels
For complete organic labeling regulations, please refer to Sections §205.303, §205.304, §205.307 and §205.311 of the USDA Organic Standards. All labels must be approved by CCOF.

For Retail Labels
Refer to this chart:

IF YOUR PRODUCT IS...

Made With Organic

Organic

100% Organic

<5,000 Organic Income; <70% Organic Content; Broker, Trader, Retailer

» CANNOT include “Certified Organic by (CCOF name/logo)” below handler/distributor name and information
» MAY describe organic ingredients as organic in ingredient statement
» CANNOT include USDA seal
» CANNOT include Certifier seal
» MAY include Percent Organic Content on Information Panel

Small Operations & Retailers MAY include “Organic” claim on Principal Display Panel

>70% Organic Content, Allowed Processing Aids

» MUST include “Certified Organic by (CCOF name/logo)” directly below handler/distributor name and information
» MUST describe organic ingredients as organic in ingredient statement
» CANNOT include USDA seal
» MAY include Certifier seal
» MAY include “Made with Organic (specified ingredients)” claim
» CANNOT include “Made with Organic Ingredients”
» MAY include Percent Organic Content on Information Panel and/or Principal Display Panel; but only if specified ingredients claim above is used
» CANNOT include “Organic” claim
» CANNOT include “100% Organic” claim

>95% Organic Content; Allowed Nonorganic Ingredients and Processing Aids

» MUST include “Certified Organic by (CCOF name/logo)” directly below handler/distributor name and information
» MUST describe organic ingredients as organic in ingredient statement
» MAY include USDA seal
» MAY include Certifier seal
» MAY include Percent Organic Content on Information Panel and/or Principal Display Panel
» MAY include “Organic” claim
» CANNOT include “100% Organic” claim

All 100% Organic Content, Only Organic Processing Aids

» MUST include “Certified Organic by (CCOF name/logo)” directly below handler/distributor name and information
» MAY describe organic ingredients as organic in ingredient statement
» MAY include USDA seal
» MAY include Certifier seal
» MAY include Percent Organic Content on Information Panel and/or Principal Display Panel
» MAY include “Organic” claim
» MAY include “100% Organic” claim

For Wine Labels

For Nonretail Containers
Nonretail containers include produce boxes, bulk products, etc. The following applies to containers for products certified as either “Organic” or “100% Organic.”

» MUST display production lot number if the operation uses a lot numbering system.
» MAY include “Certified Organic by CCOF,” the USDA seal, the Certifier seal, and/or the appropriate organic claim. Use of these elements is encouraged to ensure identification of organic products.

1Only applies to products with <70% organic content, if they also identify ingredients as organic. §205.303(a)(2), §205.305(a)(2)
2For products with 70% or more organic content, §205.303(a)(2), §205.305(a)(2)
3The size of the percentage statement must not exceed one-half the size of the largest type on the panel and which appears in its entirety in the same type size, style, and color without highlighting. §205.304(a)(1)
4The USDA seal must replicate the form and design as shown above and must be printed: on a white background with a brown outer circle and with the term, “USDA,” in green overlaying a white upper semicircle and with the term, “organic,” in white overlaying the green lower half circle; or on a white or transparent background with black outer circle and black “USDA” on a white or transparent upper half of the circle with a contrasting white or transparent “organic” on the black lower half circle. The green or black lower half circle may have four light lines running from left to right and disappearing at the point on the right horizon to resemble a cultivated field. §205.311(b)
5If displaying both the USDA seal and the Certifier seal, the USDA seal must be more prominent. §205.303(a)(5)
6Nonorganic Ingredients and Processing Aids

4

3

2

1

www.ccof.org | ccof@ccof.org | (831) 423-2263
Six Simple Steps to

DEVELOP COMPLIANT ORGANIC LABELS

Understanding Common Labeling Issues

The USDA labeling standards were formally implemented in the fall of 2002. These rules dictate how you may design your certified product label. Some of the most common labeling mistakes CCOF sees include:

- Wrong USDA seal color
- Incorrect size of USDA and certifier seals
- Incorrect product claims
- Not listing organic ingredients
- Certifier name missing or in the wrong location
- Printing before certifier has approved the label

Labeling noncompliances add unnecessary costs such as a longer inspection, staff time to respond to noncompliances, changing printing plates, and regulatory exposure of the brand and company. Severe labeling issues can include the cost of disposing of noncompliant label stock, or labor costs associated with modifying existing labeling stock. Lastly, major issues can result in substantial fines or suspension of certification.

1. The Product’s Composition Determines the Claim

The USDA has defined three categories of organic products: “100% Organic,” “Organic,” and “Made with Organic ... .” Before you create your label, your company must calculate the exact organic composition for each of your product formulations. The actual organic content of each ingredient must be taken into account. Salt and water are excluded from the calculation and the final percentage is rounded down.

Your product can make the following claim only if it meets these criteria:

- **100% Organic**
  - Each ingredient in the product must be 100% organic
  - Processing aids used in the manufacturing process must be organic

- **Organic (≥95%)**
  - Organic content must be at least 95%
  - Non-organic ingredients must be on the National List
  - Processing aids must be on list of allowed materials

- **Made With Organic (≥70%)**
  - Organic content must be at least 70%
  - Processing aids must be on list of allowed materials

2. Identify the Organic Certification Agency

The USDA NOP standards require that the name of the certifier of the product be displayed on the information panel.

- Copy should include “Certified Organic by (Certifier).” You can use the certifier’s full name or their recognized acronym. Or, you can use the certifier’s seal, instead of their name, preceded by the language “Certified Organic by (seal image).”

This statement must be placed directly below the name of the final product handler.

7.15.14
Identify the Organic Ingredients on the Ingredient Panel

For product formulas that are organic (≥95%), you must identify each organic ingredient in the finished product on the ingredient panel.

- The word “organic” can be included before each ingredient listed. Or, to save space, you can use an asterisk next to each organic ingredient and include a key beneath the list.
- If your product is 100% organic, you are not required to list each ingredient as organic on your label.

Correctly Format Percentage Statement and Claims*

Some companies choose to include a percentage statement of organic ingredients on the label. Of course, the percent statement must not be more than the actual organic content. You can include additional graphic design treatments such as banners or starbursts. However, you must adhere to the following graphic requirements:

- Font size must not exceed 1/2 the size of the largest type size on the panel. For example, if your logo type face is 24 point on the panel, your percent statement must be 12 point or smaller.
- Font must be uniform size, style, and color within the claim.
- If you are using a percentage statement on the front panel of a “Made with Organic ...” product, the “Made with Organic ...” claim must appear on the same panel.

- The “Made with Organic ...” statement can be anywhere on the label. The graphics must:
  - Not exceed 1/2 the size of the largest type size on the panel.
  - Be uniform size, style, and color within the claim.

- The statement “Made with Organic” must be followed by:
  - Up to three ingredients.
  - Up to three food groups.

- In the “Made with Organic ...” statement, the named ingredients or all ingredients in the food groups must be organic.

Step 4 is optional, or only applies to products of a certain composition. Read the step carefully and skip it if it doesn’t apply to your product.
Show Correct USDA and Certification Agency Seals

» If Using the USDA Seal
The USDA seal (optional) is only allowed on products with a “100% Organic” or “Organic” (≥95%) claim. It cannot be used on products labeled “Made with Organic (specified ingredients).” The USDA seal can be displayed anywhere on the package.

The USDA four color seal must be on a white background.
- Brown = PMS 175
- Green = PMS 348

If you do not use the colored seal, you can use the black seal. The black seal is the only other approved color and must be on a background that is white or transparent.

» If Using the Certifier Seal
You may display the certifier seal on any product with a “100% Organic,” “Organic,” or “Made with Organic (specified ingredients)” claim (optional). The certifier seal can be placed anywhere on the label, but must not be more prominent than the USDA seal.

CCOF green and yellow seal (preferred).
- Green = PMS 357
- Yellow = PMS 130

CCOF one color seal can be any color.

Send Labels to the Certification Agency for Approval

All labels must be approved by CCOF. Once your label is designed, you must submit it to CCOF or your certifier for their review, and obtain their approval before you order prints. If your certifier requests changes, you must re-submit the revised label for approval. Also, it is a good practice to request final approval in writing and place a copy in your records. Following these steps will help you avoid printing labels with mistakes.

Other Product Labeling Information & Resources

» NonRetail Bulk Labels
You are required to display a production lot code to enable traceability. It is optional to include the following: organic composition claim; “Certified Organic by” statement; certifier seal; USDA seal. CCOF recommends that you indicate “organic” on bulk packaging so handlers downstream can help maintain organic integrity of the product.

» Alcoholic Beverages
Alcoholic beverages do not require ingredient statements. There are specific alcohol labeling guides on the CCOF website and the NOP website.

» Promotional Materials
The same labeling rules apply to signage, store displays, promotional fliers, and your website. If your retailers or creative partners are responsible for producing these, be sure they know the requirements.

Additional Information & Resources
Visit www.ams.usda.gov for information on:
- USDA NOP Label Standards §205.300 to 205.311: NOP Subpart D - Labels, Labeling, and Market Information
- Watch for changes to the “Made with Organic” regulations: USDA NOP

About Our Partners
These guidelines were created in collaboration with Organic Education Solutions LLC, who offers training programs and services to support organic businesses, and Foerstel, a strategic branding and design firm who designed the mock labels.

Visit www.ccof.org/education to learn about CCOF’s organic education programs.
Frequently Asked Questions - Organic Processors and Handlers

Additional FAQs can be found online at www.ccof.org/faqs
Stay informed on certification news: www.ccof.org/certification-news

Q: How much does organic certification with CCOF cost?

A: CCOF certification is priced to provide superior value and to allow new farms, processors, and other businesses to easily enter the organic marketplace. Ongoing certification costs are based on an annual fee and the cost of the annual inspection. There is also a one-time, non-refundable application fee.

Small farms and processors are routinely certified for between $600 and $1,800. Please contact us for an individual estimate. Additional detailed information can be found in our certification fees and renewal information: www.ccof.org/certification/fees
If you need help paying for certification please read our financial assistance page: www.ccof.org/certification/fees/financial-assistance

Q: How do I control certification costs?

A: CCOF certification offers comprehensive services at a minimal cost to our clients. We understand that keeping certification costs down is important to our clients. The following tips are great ways to save time and money:

- Have your paperwork organized and prepared for your annual inspections.
- Respond to CCOF Request for Information letters in a timely manner to avoid noncompliance fees.
- Pay your annual fees on time.
- Submit your annual renewal contract on time.
- Submit paperwork for adding new acreage or facilities at least 90 days in advance of the date certification is needed.
- Submit updates to your OSP 3 weeks in advance of your need for a response to eliminate the need for rush review fees.

Q: How long does organic certification take?

A: Certification typically requires six to ten weeks; less for special cases. We generally recommend that you begin the process at least 90 days before harvest or launch of your organic line.

The length of time depends on a number of factors:

- How complete the application is when submitted
- The complexity of your operation
- How quickly you respond to any requests for information that arise during the review process

CCOF understands that you may be pressed for time or require certification by a certain deadline. In these cases, we are pleased to pull out all the stops and provide expedited services that meet your deadline. Please review our Expedited Certification Program (www.ccof.org/documents/expedited-certification-program) if you are short on time. In many cases we have reduced the timeline by several weeks and ensured the client's success.

Q: What is the Organic System Plan (OSP)?

A: The certification application is called an Organic System Plan (OSP). A complete OSP is required by the National Organic Program (NOP). The OSP is a detailed description of the practices and procedures used by your operation to produce organic goods. Clients update their OSP as changes occur.

CCOF has developed a straightforward, comprehensive OSP as part of our organic certification application. The OSP leads you through the standards and addresses common production questions and concerns.
This document acts as an agreement between you and CCOF. It defines how you remain in compliance with organic standards and explains what you do, how you do it, and what you use to do it with. During your pre-certification and annual inspections, your CCOF inspector will verify that what you do in practice matches what is in your OSP.

Q: Why do I need an Organic Inspection?
A: Organic inspections confirm that your operation meets the NOP standards and regulations both before you are certified and every year after for as long as you remain certified. Inspectors do this by confirming that what you say in your application, called an Organic System Plan (OSP), is what you are doing in practice. A CCOF-qualified inspector will conduct the inspection in an efficient manner and will file an inspection report with CCOF, which follows your OSP line by line.

Preparing for Organic Inspection is an excellent, low-cost publication from NCAT’s Sustainable Agriculture Project (https://attra.ncat.org) that includes checklists and other resources for those seeking assistance with inspection preparation.

You can reduce and control the cost of inspections in a variety of ways.

- **Inspections for New Applicants**
  - In your Organic System Plan (OSP), you explain what you do, how you do it, and what you use to do it. Once CCOF receives and reviews your application, an experienced inspector in your area is assigned to your inspection. Your inspector will contact you to set up a mutually agreeable time for your inspection.
  - The inspector will verify that your practices comply with the National Organic Program (NOP) and any international requirements you request. This is done by verifying that your OSP accurately depicts your practices and procedures.

- **Inspections for Existing Clients**
  - Currently certified operations will be annually assigned an inspection. If you are concerned about when your inspection will occur or who your inspector is, contact your Certification Service Specialist.

Q: Where can I find organic ingredients for my products?
A: Looking for organic ingredients? You can find the products produced and processed by CCOF members in our searchable online Organic Directory: www.ccof.org/directory

The following resources will help guide you in finding other sources of organic ingredients, growers, and manufacturers as well as organic suitable ingredients.

- **Organic Trade Association-The Organic Pages** www.theorganicpages.com/topo/index.html
  - Organic Trade Association (OTA) is a membership-based business association that focuses on the organic business community in North America
  - One of the largest international databases concerning biological production
- **Natural Food Network** www.naturalfoodnet.com
  - Publisher of the annual "Certified Organic Food Directory"
- **Non-GMO Report** www.non-gmoreport.com
  - Information for sourcing non-GMO products
- **Prepared Foods Wellness Directory** www.preparedfoods.com
  - Ingredient listing for natural products industry
- **Institute of Food Technologists Healthful Foods Directory** www.buyersguide.ift.org/cms
  - Natural products industry buying guide
- **606 Organic** www.606organic.com
  - Listing of available ingredients which are listed in NOP section §205.606
- **Natural Sourcing** www.naturalsourcing.com/products_organic.asp
  - Natural Sourcing supplies over 500 different organic and conventional oils, butters, essential oils and other cosmeceutical ingredients sourced from reputable manufacturers around the world
Q: What is the ‘National List’ for processed products?

A: The National List is the list of non-organic materials you are allowed to use as ingredients, additives, or processing aids in your organic products. For processors this includes materials such as yeast, citric acid, baking soda, diatomaceous earth, and others. Only non-organic ingredients and processing aids included on the National List may be used in and on your products. CCOF must approve the use of all ingredients and processing aids prior to use to protect you from inadvertent and costly mistakes.

The National List for processed products can be found in sections 205.605 and 205.606 of the National Organic Program Standards (www.ccof.org/documents/nop-standards-manual). 205.605 is a list of non-agricultural materials that may be used in or on organic products. 205.606 is a list of non-organic agricultural ingredients that may be used if they are not commercially available as organic. The National List is also available by visiting the National Organic Program website www.ams.usda.gov/AMSv1.0/nop

- To be eligible for an “Organic” label claim, a product must contain less than 5% of materials found on the National List.
- To be eligible for a “Made with Organic (specific foods or food groups)” label claim, a product must contain less than 30% non-agricultural materials included on 205.605 and any non-organic agricultural ingredient. 205.606 does not apply to products in this label category.

To demonstrate that an agricultural ingredient listed on 205.606 is not commercially available in organic form you may visit the CCOF Organic Directory (www.ccof.org/directory), 606 Organic commercial availability website (www.606organic.com), or Organic Trade Association Organic Pages directory (www.theorganicpages.com/topo/index.html). Contact inbox@ccof.org if you have more questions on how to determine if a non-organic material can be used in your product.

Q: What non-organic ingredients/materials can I use in or on my organic processed product?

A: The National List is the definitive source for allowed materials. However, several agencies and organizations create comprehensive lists of brand name products and ingredients that may be used in organic processing. Among them are the Organic Materials Review Institute (OMRI) and the Washington State Department of Agriculture. All materials must be approved by CCOF before use.

Section 205.605 of the National List lists the non-agricultural items that can be used in organic products. Some items listed on the National List appear with restrictions or “annotations” that must be followed. Non-organic ingredients and processing aids used in organic products must be produced or handled without the use of genetically engineered organisms, irradiation, or sewage sludge and must not contain prohibited materials. Furthermore section 205.606 of the National List lists the agricultural items that can be used in an “organic” labeled product when deemed not commercially available in an organic form.

Q: Can I make a certified organic product in an uncertified facility?

A: No, products labeled as organic must be produced in an inspected and certified organic facility. If you own or lease the facility, you can easily add an uncertified facility location to your own certification. If you contract with the facility to produce your products, the facility will need to apply for a separate organic certification with CCOF.

Independent businesses (not leased or owned by the certificate holder) that take possession and further process, handle, or produce organic products must be independently certified. If you would like to manage your contracted facility’s organic certification, including receiving all correspondence and invoices, please contact your Certification Service Specialist to learn more about our Contract Partner Program.

All facilities where organic product is made must be inspected and approved by your certifier before product may be sold as organic.


Q: I process organic and non-organic products. What additional measures do I need to take?

A: You must protect organic integrity during receiving, storage, processing, packaging, and transportation. Many certified operations process both organic and non-organic products without any difficulty. These operations are referred to as “mixed” operations. Mixed operations are responsible for protecting organic ingredients and products throughout
production. This is done by preventing commingling of organic and nonorganic ingredients and contamination of organic ingredients with prohibited sanitizers, processing aids, and pest control materials.

CCOF’s H4.0 Organic Practices form (www.ccof.org/documents/h40-organic-practices) asks specific questions about how you will protect organic integrity. This is often accomplished by separate storage shelving or storage rooms, clear signage, labels, cleaning records, and other system-level approaches in the facility. Some operations do a thorough cleaning or purging in between runs or have dedicated organic runs prior to non-organic.

Q: What cleaners or sanitizers can I use?

A: CCOF cannot recommend any specific cleaners or sanitizers. Processors/handlers are permitted to use any sanitizer allowed for cleaning food contact surfaces as long as the sanitizer does not leave a residue and does not come in contact with organic products. Sanitizers that contact organic products must be on the National List (205.605). The National List (205.600-205.606) is available by visiting the National Organic Program website (www.ams.usda.gov/AMSv1.0/nop) or by downloading the USDA National Organic Standards, 7 CFR Part 205 www.ccof.org/documents/nop-standards-manual.

There are a few sanitizing agents listed specifically on 205.605 as allowed for cleaning of equipment and/or direct food contact. Chlorine, peroxyacetic acid, hydrogen peroxide and ozone are a few with particular annotations.

All sanitizers and cleaners must be reviewed by CCOF before use. To have a sanitizer or cleaner reviewed by CCOF, submit a label listing the ingredients to inbox@ccof.org. Once approved by CCOF, the material should be added to your Organic System Plan (OSP).

Q: How do I control pests in my facility?

A: The National Organic Program (NOP) outlines a specific order of pest control methods in areas where organic products are processed, handled, or stored.

1. First use preventative measures such as good sanitation, then mechanical measures, such as mechanical, sticky, or pheromone traps.
2. If preventative and mechanical measures do not adequately control pests, you may use NOP allowed materials from the National List, including carbon dioxide, nitrogen, Vitamin D3 bait, boric acid, diatomaceous earth, or soap products.
3. If preventative, mechanical and National List materials are not effective, you may use synthetic pesticides. You must notify CCOF before you use synthetic pest control materials by providing the following information:
   - Product labels for all pest control materials used in organic production or storage areas.
   - A letter of justification from your pest control company for its use explaining why you are unable to use National List materials.

All pest control plans and materials must be approved by CCOF before implementation. Pest control records should be onsite and available for inspection. There are no NOP restrictions on the use of synthetic materials outside your facility or in non-organic production areas. Once approved by CCOF, the material should be added to your Organic System Plan (OSP).

Q: What is an audit trail?

A: The best way to imagine an audit trail is to think of a food safety product recall. If you found out that a specific lot of an organic ingredient was contaminated, you would use your recordkeeping system to determine which final batches of product that ingredient went into. An audit trail is the collection of documents that would allow you to do that.

Your audit trail documents should show the purchase and use of organic products in addition to showing how much finished product was produced and sold. Records should disclose all of your activities and transactions with enough detail to be readily understood and audited.

Records must be available onsite during normal business hours so that authorized state and certifying agents can verify your compliance with the National Organic Program standards. You must maintain records for a minimum of five years.
Q: How can I prepare for the audit trail portion of my inspection?

A: Your inspector will probably focus on records from the past year, but records for five years should be accessible as well.

- Growers should prepare a copy of your Organic Farm Input Report (OFIR) to show all inputs going back to the last inspection. If there are many redundant input applications, you may prepare a summary OFIR that lists each material applied.
- Mixed operations (organic and non-organic) should separate organic records so they are more accessible and easy to understand.
- Processors and handlers must be prepared to track final products back through processing stages to starting ingredients.

The inspector must understand the audit trail before s/he can test it. Frequently, inspectors have asked a lot of questions to understand an audit trail. Be prepared to explain how your audit trail works. Prepare a flow chart if your audit trail is complex. Teach the inspector how your records work; this will make their job easier and faster.

Q: What is a lot number?

A: A lot number is a tracking system that links the organic product back to the farmer or incoming ingredient. The lot numbering system provides critical information regarding the origin of the products being used by processors/handlers, especially in the age of increased food safety requirements.

Both incoming and outgoing products should include lot numbers to allow both recall and ingredient tracking throughout the system. Common outgoing lot numbers include production dates, roasting or best by dates, and sequential numbering systems.

- Outgoing lot numbers should be linked to production logs or batch sheets.
- Production logs or batch sheets should link to incoming ingredients through incoming ingredient lot numbers.
- Incoming ingredient lot numbers may be created by the manufacturer and listed on the package, or you may need to develop your own system.
- Incoming ingredient lot numbers should link to packing slips, BOL, PO, or other documents associated with incoming ingredients. If lot numbers are not listed on the documentation, you must maintain a record that links lot numbers to the original packing slip, BOL, or PO.
Organic and Food Safety Consultants

Need outside help? CCOF cannot actively consult with its clients regarding organic certification compliance. We do offer a list of organic consultants and agricultural advisors as a resource. This list includes names and contact information as well as a description of the services each consultant provides. Organic consultants work in a variety of areas and can help with preparation of your Organic System Plan and addressing complicated regulatory issues. Visit www.ccof.org/certification/help/consultants-ag-advisors for the most current list of consultants.

Organic Consultants

<table>
<thead>
<tr>
<th>Name and Description</th>
<th>Contact Information</th>
</tr>
</thead>
</table>
| **BiOrganic Solutions Mexico**  
Apoyo y gestión de Certificaciones y/o inspecciones orgánicas, desarrollo de Plan de Manejo Orgánico, Gestión de Registro y auditorias; Revisión y registro de Insumos (Fertilizantes y Plaguicidas) Acreditación de OMRI, CDFA, etc; Soluciones a la medida. Vinculación con el sector orgánico. Acreditación orgánica.  
Conduct Organic Certifications and/or Inspections, Development of Organic System Plan, carry out audits or inspections; Input Review and registration (Fertilizers & Pesticides) OMRI, CDFA, etc; Tailored Solutions. Organic Networking. Organic Accreditation.  
**Specialization:** Certificaciones y Registros; USDA-NOP, LOOA-SAGARPA rules  
Languages in addition to English: Español | **René Anguiiano Uribe**  
Guadalajara, Mexico  
(333) 579-7668  
rene@biorganics.com.mx  
bioorganics.com.mx  
**Service Area:** México, Estados Unidos, Centro y Sur América |
| **Cannabis Ag Advisors**  
I have been involved in organic ag for nearly twenty years (both growing and inspecting), as well as working closely with cannabis production for the last 10 years, and now with hemp as a viable crop! I offer organic certification help and consulting for hemp, as well as SOP’s and complaint practices for cannabis production. Also, how to maintain biodiversity within hemp and cannabis operations.  
**Specialization:** Grower, Processor/Handler | **Seth Rosmarin**  
(530) 559-3552  
cannabisagadvisors@gmail.com  
**Service Area:** Anywhere or via phone or video chat |
<table>
<thead>
<tr>
<th>Name and Description</th>
<th>Contact Information</th>
</tr>
</thead>
</table>
| **Christie Organic Consultants, Inc.**  
Having worked both for major organic certification agencies as an inspector, reviewer, and certification representative, and as an independent organic consultant with a prominent consulting firm, anything from the most humble farm to the most complex multi-ingredient processing and packing operations, Lois Christie has seen it all from both sides, making Christie Organic Consultants uniquely qualified to assist you with all things organic. Lois is well versed in the regulations and requirements for the USDA National Organic Program (NOP), as the international standards such as Canada, the EU, Japan and Switzerland. We will train you and your staff, prepare your application and update existing forms and systems or create new ones, as needed. We will also assist with material reviews, extensive or complex responses, mediations and/or appeals.  
*Después de haber trabajado para los principales organismos de certificación orgánica como un inspector, revisor y representante de certificación y como consultor independiente orgánico con una consultoría prominente, Lois Christie ha visto todo de diversas perspectivas, desde la más humilde granja hasta el más complejo procesamiento de multi-ingredientes al igual que operaciones de empaque; esto hace Christie Organic Consultants este capacitada especialmente para ayudarte con todo su manejo orgánico. Lois está altamente capacitada en los reglamentos y requisitos para el programa orgánico nacional (NOP) del USDA, así como muchas normas internacionales tales como Canadá, la UE, Japón y Suiza. Capacitaremos a su personal, prepararemos su solicitud y actualizaremos las formas y sistemas existentes o crear nuevos procesos según sea necesario. También le ayudaremos con materiales y opiniones; respuestas extensas o complejas, mediaciones y/o apelaciones.*  
**Specialization:** Grower, Livestock, Processor, Trader, Co-Packer, Retail, Restaurant, USDA National Organic Program, Mexico (Reglamento de Productos Orgánicos/SAGARPA), Biodynamic, Non-GMO Certification, NSF 305 Body Care Certification, Material Registration (Review, OMRI, WSDA, CDFA)  
**Languages in addition to English:** Spanish | **Lois Christie**  
1119 S. Mission Rd. #245  
Fallbrook, CA 92028  
(760) 723-3775  
lois@christieorganic.com  
www.christieorganic.com  
**Service Area:** Worldwide, specializing in the U.S. and Mexico |
| **Daniel Giacomini**  
Independent nutritional and dairy management consultant for 25 years focusing on both conventional and certified organic dairy operations. Developed a process to customize nutritional and management programs for dairy farmers and the dairy feed industry while working to create a greater interface between industry and the dairy farmer - particularly certified organic dairy farmers.  
**Specialization:** Livestock (dairy) | **Daniel Giacomini**  
P.O. Box 354  
Middletown, CA 94561  
(707) 987-9184  
dg.giacomini@gmail.com |
| **Dr. Joe Montecalvo**  
Specializes in all aspects of handler and food processing certification requirements for USDA-NOP, EU and export to Japan and Canada compliance requirement. Have served as both an inspector and consultant to the organic food processing industry since 1993. Also specialize in organic food safety, HACCP assessments and optimization of plant sanitation operations and employee training in all areas of organic food safety.  
**Specialization:** Processor/Handler | **Joe Montecalvo, PhD**  
510 Fresno Ave.  
Morro Bay, CA 93442  
(805) 772-3574  
montecalvo@charter.net  
**Service Area:** U.S. and international |
| **Four Seasons Ag Consulting**  
Farming organically ourselves since 1989, we help develop Farm Plans and OSPs. We also provide full-service monitoring and recommendations for pest, disease and weed management and fertility needs.  
**Specialization:** Grower | **Cindy Lashbrook, Bill Thompson**  
12230 Livingston Cressey Rd.  
Livingston, CA 95334  
(209) 761-0081  
foursea@clearwire.net  
**Service Area:** Central and Northern California |
| **Full Circle Consulting LLC**  
20 years of experience in the organic industry, with food safety emphasis [GFSI, GMP, HACCP]. Services include organic compliance assessment, organic system plan development, certification application, employee training, inspection support, supplier/co-packer audits.  
**Specialization:** Processor/Handler, Broker/Trader, Co-Packer/Private Labeler, Retailer | **Patti Bursten Deutsch**  
P.O. Box 165  
Viroqua, WI 54665  
(608) 206-6499  
pattibd@gmail.com  
**Service Area:** North America |
<table>
<thead>
<tr>
<th>Name and Description</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Independent Organic Services, Inc.</strong></td>
<td><strong>Garth Kahl</strong></td>
</tr>
<tr>
<td>Consulting and assistance in all areas of organic production, processing and certification. Over 20 years working in organic certification. Accredited organic inspector, former certification program manager for a large national certifier. Trained in HACCP, ISO 9001:2001. Experienced with NOP, JAS, COR and EU organic standards.</td>
<td>14941 Lobster Valley Rd. Alsea, OR 97324 (541) 486-4400 / (541) 602-2156 <a href="mailto:gkahl@peak.com">gkahl@peak.com</a> <a href="http://www.independentorganic.com">www.independentorganic.com</a></td>
</tr>
<tr>
<td>Consultoría y asistencia en todas las áreas de producción, procesamiento y certificación orgánica. Más de 20 años trabajando en certificación orgánica. Inspector orgánico acreditado, ex gerente del programa de certificación para un gran certificador nacional. Formado en HACCP, ISO 9001: 2001. Experiencia con NOP, JAS, COR y los estándares orgánicos de la UE. <strong>Specialization:</strong> Farming, Livestock, Processor/Handler, apiculture, community grower groups, and transition to Organic (agricultura, ganado, manipulación/procesamiento, apicultura, grupos comunitarios y la transición a producción orgánica) <strong>Languages in addition to English:</strong> Spanish</td>
<td><strong>Service Area:</strong> Global</td>
</tr>
</tbody>
</table>

| **Integrated Organic Services, Inc.** | **Cara Smiley** |
| Based in Mexico, we provide evaluation, development, training and verification to the following international organic standards to companies located in the USA, Mexico and Central and South America: NOP, COR, EU, JAS, IFOAM and CAAQ. We evaluate inputs for compliance to the NOP and translate the documentation required to obtain OMRI registration. We put our bilingual organic expertise at your disposal. Basado en México, proveemos evaluación, desarrollo, capacitación y verificación a las siguientes normas orgánicas internacionales a empresas ubicadas en los EEUU, México y Centro y Sur América: NOP, COR, EU, JAS, IFOAM y CAAQ. Evaluamos el cumplimiento de insumos al NOP y traducimos la documentación requerida para obtener el registro OMRI. Review & translation of documents required to obtain OMRI registration of inputs & materials. Internal on-site inspections. Development & review of Standard Operating Procedures & Logs (receiving, production, pest control, sanitation, etc.). Training programs. Review of ingredients & materials. Development & review of audit tracking systems. Revisión y traducción de documentos requeridos para obtener registro OMRI para insumos y materiales. Inspecciones internas de instalaciones. Desarrollo y revisión de Procedimientos Estandarizados Escritos y Bitácoras (recepción, producción, control de plagas, limpieza, etc.). Programas de capacitación. Revisión de ingredientes y materiales. Desarrollo y revisión de sistemas de rastreo. **Specialization:** Grower (including greenhouse), Processor/Handler, Retail **Languages in addition to English:** Spanish | Oaxaca, Oaxaca, Mexico +52 1-951-228-3386 csmiley@integratedorganic.com www.integratedorganic.com |

| **Karlin Strategic Consulting LLC** | **Marni Karlin** |
| With over 15 years experience in private/non-profit sectors, and all three branches of federal government, Karlin Strategic Consulting offers persuasive and effective regulatory and policy advocacy, political strategy, and coalition building for the organic food and agriculture sector. Former VP of Government Affairs/General Counsel for the Organic Trade Association. | 2107 S Street NW Unit M Washington, D.C. 20008 (202) 236-7473 marni@karlinstrategic.com www.karlinstrategic.com |
| **Specialization:** Regulatory and policy assistance; strategic advice and counsel | **Service Area:** Worldwide |

<p>| <strong>Keep It Simple: Organic Solutions</strong> | <strong>Benjamin Lewis</strong> |
| Because all operations are unique, I am dedicated to designing compliance systems that are tailored to meet the needs of your operation while being practical, manageable and above all simple. Because if it doesn’t work for you, it doesn’t work. As a full time organic inspector since 2006, I have completed over 1,200 inspections, encompassing grower, handler/processor, livestock and dairy operations. From trace-back audits to dry matter calculations, I have the necessary expertise to reduce your paperwork burden while providing solid systems of documentation that will keep your certification efforts as efficient and hassle-free as possible. | 204 J St. Davis, CA 95616 (530) 574-1407 <a href="mailto:SimpleOrganicSolutions@gmail.com">SimpleOrganicSolutions@gmail.com</a> <a href="http://www.KeepItSimpleOrganicSolutions.com">www.KeepItSimpleOrganicSolutions.com</a> |
| <strong>Specialization:</strong> Grower, Livestock, Processor/Handler | <strong>Service Area:</strong> Worldwide |</p>
<table>
<thead>
<tr>
<th>Name and Description</th>
<th>Contact Information</th>
</tr>
</thead>
</table>
| Mark Chass | Mark Chass  
P.O. Box 2161  
Sebastopol, CA 95473  
(707) 824-9544  
cell (707) 217-6351  
markchass@comcast.net  
**Service Area:** San Francisco Bay Area and Northern California |
| **ORG&NICS** | **Vickie Natale**  
San Clemente, CA  
(949) 481-9900  
vickie@orgnics.com  
www.orgnics.com  
**Service Area:** Worldwide |
| The ORG&NICS online course is a rapid, simplified walk-through to best prepare you, your employees and your facility for the USDA Organic Certification audit and continued compliance. No matter your product, whether it's energy bars, a great new line of skincare or the best herbal remedy, this course has all the required regulatory preparation and details ready for you. You just customize and fill in the blanks while guided each step of the way (including live one-on-one help) to being fully prepared for your first successful USDA Organic Audit.  
**Specialization:** Personal Care and Food Products for Manufacturers, Processors |
| **Organic Consulting Firm, The** | **Karen Troxell, Shannon Murphy**  
30520 Rancho California Road Suite 107-101  
Temecula, CA 92591  
(951) 676-4395  
info@theocf.com  
www.TheOCF.com  
**Service Area:** Offices located in Southern California, traveling globally, specializing in the U.S., and Canada |
| Let The Organic Consulting Firm (The OCF) do the work for you! The OCF is an international company providing full-service evaluation, development, training, and verification to organic standards, including USDA, JAS, Canada, EU, and others. The founders are active in today’s organic certification industry. The OCF will integrate organic compliance into existing procedures to create a complete customized Organic System Plan.  
**Specialization:** Grower, Livestock, Processor/Handler, Retail |
| **Organic Education Solutions (OES), LLC** | **Krista Wanser**  
P.O. Box 104  
Dwight, NE 68635  
(608) 206-6499  
support@organiceducationsolutions.com  
www.organiceducationsolutions.com  
**Service Area:** Worldwide |
| Organic Education Solutions offers premier trainings, products and consulting services to organic and food safety operators. Our goal is to increase your company’s compliance to industry requirements. We offer critical knowledge of best practices to improve the performance of your team and system and prevent common and costly mistakes. Visit us at our website and try our training kit, "Keep It Organic" for organic processing employees.  
**Specialization:** Qualified for national and international organic and food safety programs for growers, livestock and processors |
| **Organic Help** | **Carol Cripe**  
32902 Lilac Road  
Valley Center, CA 92082  
(760) 550-0519  
lilacoaksranch@gmail.com  
**Service Area:** Southwest U.S. |
| Organic certification consultant specializing in crops and processing. Services include assessment to USDA NOP and international standards compliance. Offering complete Application and Organic System Plan development. Consulting with emphasis on support and education for the producer and staff.  
**Specialization:** Grower, Processor/Handler |
| **Organic Integrity International** | **Rick Martinez**  
908 W. Virginia Ave  
Tampa, FL 33603  
(813) 765-0282  
organicintegrity@msn.com  
**Service Area:** Worldwide |
| Over 35 years of experience in organic handling, farming and consulting/training. Have worked in over 40 countries with governments, many of the largest organic companies in the world down to small start-ups. I am sure we can assist in bringing success to your certified organic endeavors.  
**Specialization:** Grower, Grower Groups, Processor/Handler (simple and complex manufacturing), Retail  
**Languages in addition to English:** Spanish |
| **Organic Systems International, Inc.** | **Stanley Edwards**  
1665 N. 1770 E  
Logan, UT 84341  
(208) 354-4467  
stanley_edwards@comcast.net  
**Service Area:** Worldwide |
| Specialist in farm and handler organic, food safety and quality compliance consulting and training. Quick delivery of high quality plans, streamlined and customized to the company's needs. 20 years experience in organic audits. Currently enrolled at Utah State University for a Masters in Food Safety and Quality.  
**Specialization:** Grower, Livestock, Processor/Handler  
**Languages in addition to English:** French |

2155 Delaware Avenue, Suite 150, Santa Cruz, CA 95060 • (831) 423-2263 • fax (831) 423-4528 • ccof@ccof.org • www.ccof.org
<table>
<thead>
<tr>
<th>Name and Description</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Richard D. Siegel Law Offices</strong>&lt;br&gt;Agricultural lawyer in Washington, DC, for over 30 years, specializing in legal counsel and Federal government representation for organic food &amp; fiber companies, ingredient companies, fertilizer and seed companies, associations and certifiers.&lt;br&gt;<strong>Former Deputy Assistant Secretary, USDA.</strong>&lt;br&gt;<strong>Specialization:</strong> Regulatory Assistance</td>
<td><strong>Richard Siegel</strong>&lt;br&gt;600 New Hampshire Ave. NW #500&lt;br&gt;Washington, D.C. 20037&lt;br&gt;(202) 518-6364&lt;br&gt;fax (202) 234-3550&lt;br&gt;<a href="mailto:rseigel@rdslaw.net">rseigel@rdslaw.net</a>&lt;br&gt;www.rdslaw.net&lt;br&gt;<strong>Service Area:</strong> U.S. and international</td>
</tr>
<tr>
<td><strong>Rick Falkenberg, Ph.D.</strong>&lt;br&gt;We simplify the certification process for you, no matter if you are experienced or a beginning organic producer, processor, trader, distributor, retailer or restaurateur. We can assist you in assuring that your organic facility, ingredient and product suppliers are fully compliant to standards such as the USA NOP 7 CFR Part 205, the European Union EEC 2092/91, the Japan JAS and IFOAM.&lt;br&gt;<strong>Specialization:</strong> Processor/Handler, Retail</td>
<td><strong>Rick Falkenberg, Ph.D.</strong>&lt;br&gt;Turlock, CA 95382&lt;br&gt;(831) 596-3652&lt;br&gt;fax (888) 867-4137&lt;br&gt;<a href="mailto:falkenberg@sbcglobal.net">falkenberg@sbcglobal.net</a>&lt;br&gt;<strong>Service Area:</strong> California and Pacific Northwest</td>
</tr>
<tr>
<td><strong>Sheila Linderman</strong>&lt;br&gt;Organic certification and products specialist, with expertise in processing, farming, and personal care/cosmetics.&lt;br&gt;<strong>Specialization:</strong> Grower, Processor/Handler, Personal Care Products, Retail&lt;br&gt;<strong>Languages in addition to English:</strong> French, German, Italian, Spanish</td>
<td><strong>Sheila Linderman</strong>&lt;br&gt;5265-1 Newcastle Avenue&lt;br&gt;Encino, CA 91316&lt;br&gt;(818) 578-3786&lt;br&gt;cell (818) 235-2232&lt;br&gt;<a href="mailto:sheila@sheilalinderman.com">sheila@sheilalinderman.com</a>&lt;br&gt;www.sheilalinderman.com&lt;br&gt;<strong>Service Area:</strong> U.S., Canada, EU (particularly France, Germany, Italy, Spain, UK), Morocco</td>
</tr>
<tr>
<td><strong>Simple Organic Solutions</strong>&lt;br&gt;Experts in processing and handling. SOS knows the regulations, understands the processing industry and can accommodate to your unique needs.&lt;br&gt;<strong>Specialization:</strong> Personal Care Products, Processor/Handling</td>
<td><strong>Bob Durst</strong>&lt;br&gt;1873 Bullevard&lt;br&gt;Philomath, OR 97370&lt;br&gt;(541) 740-6490&lt;br&gt;fax (509) 991-5660&lt;br&gt;<a href="mailto:BobD@SimpleOrganicSolutions.com">BobD@SimpleOrganicSolutions.com</a>&lt;br&gt;www.simpleorganicsolutions.com&lt;br&gt;<strong>Service Area:</strong> Primarily Western U.S.</td>
</tr>
<tr>
<td><strong>Solstice Solutions</strong>&lt;br&gt;Solstice Solutions specializes in regulatory and certification assistance for the mushroom farming, processing and retail industries. Whether you are just starting your operation, or need assistance transitioning to a Certified Organic status, we have a solution for you! We are experts in mushroom farming, organic certification, and MGAP systems.&lt;br&gt;<strong>Specialization:</strong> Grower, Processor/Handler, Broker, Private Label, Retail/Restaurant, Split-Operations</td>
<td><strong>Krysta Froberg</strong>&lt;br&gt;P.O. Box 10182&lt;br&gt;Spokane, WA 99209&lt;br&gt;(509) 994-7611&lt;br&gt;(667) 713-9556&lt;br&gt;<a href="mailto:krysta@solsticesolutionsllc.com">krysta@solsticesolutionsllc.com</a>&lt;br&gt;www.solsticesolutionsllc.com&lt;br&gt;<strong>Service Area:</strong> Worldwide</td>
</tr>
<tr>
<td><strong>Soporte Tecno comercial de México SC/Agrosupport of Mexico</strong>&lt;br&gt;Experience in all aspects of handler and crop certification requirements for USDA-NOP, Organic Food Safety, HACCP assessments and optimization of plant sanitation operations, as well as employee training in all areas of organic food safety.&lt;br&gt;<strong>Specialization:</strong> Technical and commercial support in the whole agricultural supply chain&lt;br&gt;<strong>Languages in addition to English:</strong> Spanish</td>
<td><strong>Eduardo Medina</strong>&lt;br&gt;Batría de Churubusco 1870-1 Col. Chapultepec&lt;br&gt;Culiacán, Sinaloa, Mexico 80040&lt;br&gt;(667) 713-9592 / (667) 713-9556&lt;br&gt;(667) 755 0676&lt;br&gt;<a href="mailto:emedina@agsm.mx">emedina@agsm.mx</a>&lt;br&gt;www.agsm.mx&lt;br&gt;<strong>Service Area:</strong> U.S., Mexico, and South America</td>
</tr>
<tr>
<td>Name and Description</td>
<td>Contact Information</td>
</tr>
<tr>
<td>----------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td>Stephen V. Bird</td>
<td>Stephen V. Bird</td>
</tr>
</tbody>
</table>
| Let me help you to organize your organic documentation for an initial application or your next inspection. I have over 15 years of experience in organic growing, consulting, and inspections for growers, handlers, and processors. I can save you time and money; creating your organic system plan (OSP), training your staff to lead inspections, preparing for your next inspection (mock inspection), or solving issues of concern identified on your last inspection. I know what it takes to get through inspections efficiently. Assisting clients in California and the western states. **Specialization:** Grower, Processor/Handler, Food Safety (GLOBALG.A.P., Ranch, Harvest Crew, Cold Storage, Processing w/ HACCP, & MGAP) | 10 Raymond Court  
Logan, UT 84321  
(916) 214-3954  
stevenvbird@gmail.com  
www.organicandfoodsafetytraining.com  
Service Area: California and Western States |
| Sustainable Strategies | Robert Anderson     |
| Advisors in Food and Agriculture. Bob Anderson is a recognized authority and has hands-on experience in all aspects of organic agriculture, organic processing, organic certification, marketing, government relations and international trade. He also serves as an advisor to OTA, the USDA, NOP, Foreign Agriculture Service, USTR and U.S. Department of State. Until 2000, he was president of Walnut Acres Organic Farms, America’s original organic farm and first value added processor. **Specialization:** Processor/Handler and International/foreign certifications and trade agreements as well as Organic Strategies and Livestock production, including Animal Welfare. | 206 Harris Avenue  
Boalsburg, PA 16827  
(814) 574-1063  
bobanderson1217@yahoo.com  
Service Area: Worldwide |
| Todd Linsky Consulting | Todd Linsky        |
| Todd Linsky Consulting, an organic brand management company, offers a balanced approach and a quality of service not currently available. TLC focuses on serving the comprehensive needs of growers, retailers, and wholesalers worldwide by building brands and increasing supplies while maintaining the integrity of the natural products industry. **Specialization:** organic brand management; bridging the gap between the grower, the wholesaler, and the retail community | (661) 342-3409  
todd@toddlinsky.com  
www.toddlinsky.com  
Service Area: Worldwide |
| Wolf, DiMatteo & Associates, Inc. | Bill Wolf - President, Sandy Mays - Partner, Operations & Certification Support, Katherine DiMatteo - Managing Partner, Client Services, Sue Wagner - Associate, Input Reviews and Compliance | Experts in organic regulations, policy, compliance, strategy, production, and handling. NOSB petitions; certification assistance, Organic System Plans for NOP, EU, COR; input reviews and OMRI, WSDA, CDFA approvals. Helping people with strategic plans, sustainable development, and triple bottom line mission for over 30 years. Network of associates worldwide. **Specialization:** Grower, Livestock, Processor/Handler, Retail, Wild Harvest | 49 Race Street  
P.O. Box 458  
Newcastle, VA 24127  
(540) 864-5107  
fax (540) 864-5161  
info@organicspecialists.com  
www.organicspecialists.com  
Service Area: Worldwide |

### Food Safety Consultants

<table>
<thead>
<tr>
<th>Name and Description</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAFF (Community Alliance with Family Farmers)</td>
<td>Kali Feiereisel</td>
</tr>
</tbody>
</table>
| The Community Alliance with Family Farmers advocates for CA family farmers and sustainable agriculture. CAFF’s food safety services to farmers include: Workshops to assist growers in understanding what GAPs are and what growers need to do to follow/adopt GAP principles; One-on-one field visits to help identify areas of concern and where possible practical solutions to food safety concerns; Review of food safety plans for third party audit preparation and assistance for preparing documentation for an audit; Mock audits for ensuring preparedness for a 3rd party audit; and food safety resources for farmers. CAFF members receive reduced rates for these services. A description of CAFF’s food safety services can also be found at www.caff.org/programs/foodsafety. **Specialization:** Food safety for family farms | CAFF (Community Alliance with Family Farmers)  
(530) 756-8518 ext. 135  
foodsafety@caff.org  
www.caff.org  
Service Area: California |
<table>
<thead>
<tr>
<th><strong>Name and Description</strong></th>
<th><strong>Contact Information</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Cathy Carlson</td>
<td>Cathy Carlson</td>
</tr>
</tbody>
</table>
| Cathy Carlson is a private consultant for on farm food safety programs of all sizes. She brings to farmers a diverse background of program management, regulatory experience and sustainable farming as a Farm Fellow with the Ecological Farming Association. She has spent the past few years working as a Quality Assurance and Food Safety Manager for the fresh cut produce industry in the Central Coast area. Prior to that she worked for state and federal agencies as a policy regulator and agriculture research aide. She has been the project manager on diverse projects ranging from residential construction to sustainable small-scale farming. Her mission is to diversify a simple, low cost food safety plan to assist and advise family farmers as the requirements of the food safety modernization act are unveiled. **Specialization:** Fresh Cut Produce (Leafy Greens) | Carlson Food Safety Consulting  
(831) 818-4109  
carlsonfsconsulting@gmail.com  
www.linkedin.com/in/cathycarlson |
| Gary Rohman              | Gary Rohman            |
| Gary Rohman’s career spans over 30 years in agriculture and ranch operations. In 2009, Rohman began Farm to Fork, LLC, which specializes in food safety compliance consulting. Rohman builds food safety programs for growers that walk them through the requirements of the food safety standards, simplifying the audit process for each grower while teaching them the importance of food safety. Rohman understands the complexities of farming in the 21st century, and can offer many cost/time saving ideas to meet food safety compliance. **Specialization:** Food Safety Compliance Services | Farm to Fork, LLC  
(559) 804-6113  
gary@farmtoforkservices.com  
Service Area: California and Idaho |
| Juli Ogden of The Farm Plan | Juli Ogden             |
| Juli Ogden is pioneering a way of doing things that is within reach of every farm, no matter how large or how small. The Farm Plan is available in a variety of formats, and training and services offered include public workshops, group consulting and 1 on 1. Her training is highly practical, and participants in public training courses walk away having completed much of their food safety program. For group and 1-on-1, services are tailored to the crop and individual circumstances. The Farm Plan covers GLOBALG.A.P, IFA, HPSS and Organic programs, allowing farmers to save time and money through a single program. Service areas: Based in Washington State, but we serve farmers all over the U.S **Specialization:** GlobalG.A.P., Organic | The Farm Plan  
100 Malaga Alcoa Hwy  
 Wenatchee, WA 98801  
(509) 662-7600  
juli@thefarmplan.com  
www.thefarmplan.com  
Service Area: United States |
| Stephen V. Bird          | Stephen V. Bird        |
| Let me help you to simplify navigating food safety rules under an organic management system. I can save you time and money; creating a food safety plan, preparing for your next audit (mock audits), meeting FSMA requirements, training your staff to lead audits, and/or solving issues of concern noted in previous audits. I know what it takes to get through audits efficiently. Lead Instructor: FSPCA Preventive Controls for Human Food, FSMA Produce Rule, & HACCP. (Please visit my website for information on current trainings). **Specialization:** Grower, Processor/Handler, Food Safety (GlobalGap, Ranch, Harvest Crew, Cold Storage, Processing w/ HACCP, & MGAP) | 10 Raymond Court  
Logan, UT 84321  
(916) 214-3954  
stephenvbird@gmail.com  
www.organicandfoodsafetytraining.com  
Service Area: California and Western States |

**Ag Advisors**

<table>
<thead>
<tr>
<th><strong>Name and Description</strong></th>
<th><strong>Contact Information</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Agricultural Consulting, Inc.</td>
<td>James Mose</td>
</tr>
</tbody>
</table>
| We have been in business for 15 years offering field scouting, IPM program design, and beneficial insects for growers. Our concentration is in avocados and citrus, of which we currently scout about 2500 acres in San Diego and Riverside counties, of which about 450 acres is organic. Jim Davis has held PCA license # 2759 since 1984 and has also worked in vegetables, herbs, cut flowers, nursery, and turf. | Selma, CA  
(559) 285-7757  
mosebug@hotmail.com |
| American Insectaries, Inc | James Davis            |
| We have been in business for 15 years offering field scouting, IPM program design, and beneficial insects for growers. Our concentration is in avocados and citrus, of which we currently scout about 2500 acres in San Diego and Riverside counties, of which about 450 acres is organic. Jim Davis has held PCA license # 2759 since 1984 and has also worked in vegetables, herbs, cut flowers, nursery, and turf. | Escondido, CA  
(760) 747-2920 |
<table>
<thead>
<tr>
<th>Name and Description</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ATTRA/NCAT</strong>&lt;br&gt;The National Center for Appropriate Technology (NCAT) manages the ATTRA project — the National Sustainable Agriculture Information Service. ATTRA provides free information in English and Spanish about organic farming and marketing. These resources help guide certifiers and producers through transition, certification, and production for a wide range of crops and livestock.</td>
<td><strong>Rex Dufour, Marisa Alcorta</strong>&lt;br&gt;Davis, CA&lt;br&gt;(530) 792-7338&lt;br&gt;<a href="mailto:rexd@ncat.org">rexd@ncat.org</a>&lt;br&gt;<a href="mailto:marisaa@ncat.org">marisaa@ncat.org</a>&lt;br&gt;www.ncat.org</td>
</tr>
<tr>
<td><strong>Crop Production Services, Inc.</strong>&lt;br&gt;At Crop Production Services we are focused on one thing and one thing only – providing our customers with the products and services they need to grow the best crops possible. We do this farm by farm, nursery by nursery and customer by customer by leveraging our global experience. With more than 30 staffed facilities in California our strength in “Matching Science and Technology to Grower Needs” is the benchmark for superior agricultural sales and service to California’s diverse grower community. At C.P.S. we recognize the importance of organic farming and carry a wide selection of organic products.</td>
<td><strong>David Goodrich</strong>&lt;br&gt;Santa Maria, CA&lt;br&gt;(805) 928-8277&lt;br&gt;<a href="mailto:david.goodrich@cpsagu.com">david.goodrich@cpsagu.com</a>&lt;br&gt;<strong>Glenn Feenstra</strong>&lt;br&gt;Riverside, CA&lt;br&gt;(951) 203-4995&lt;br&gt;<a href="mailto:glenn.feenstra@cpsagu.com">glenn.feenstra@cpsagu.com</a>&lt;br&gt;<strong>Ryan Vieira</strong>&lt;br&gt;Fresno, CA&lt;br&gt;(559) 349-9508&lt;br&gt;<a href="mailto:ryan.vieira@cpsagu.com">ryan.vieira@cpsagu.com</a>&lt;br&gt;www.cpsagu.com</td>
</tr>
</tbody>
</table>
## Equipment Cleaning Log

If you grow or handle both organic and non-organic products, equipment must be cleaned according to protocol set forth in your organic system plan (OSP) in order to maintain the organic integrity of your product. To ensure that this is done properly, keep this form near each piece of equipment that is cleaned and update it every time.

**Operation Name:** ________________________________  **Year:** ________________  

<table>
<thead>
<tr>
<th>Type of Equipment</th>
<th>Date Cleaned</th>
<th>By</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Additional Notes and Observations:**

Reproducible versions of this recordkeeping tool can be found at [www.ccof.org/documents](http://www.ccof.org/documents)
# Search Record: Commercial Availability of Organic Agricultural Ingredient

Use this form to document your search as required on the H2.7 Commercial Availability form.

<table>
<thead>
<tr>
<th>Operation Name:</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ingredients name as it appears on the National List 205.606 (ex: lecithin)</th>
<th>Suppliers contacted to request organic ingredient</th>
<th>Dates Contacted</th>
<th>Method of Contact</th>
<th>Supplier Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Pest Control Material Justification

Justification is required when pest control materials that are not on the National List are used in organic production and storage areas. See the H4.0 Organic Practices form for more information.

Operation Name: ____________________________ Date: ______________

Pest Control Manager: ____________________________

Materials used in organic production and storage areas that are not on the National List:

________________________________________________________________________

________________________________________________________________________

Why are National List materials ineffective at preventing or controlling pests? This may include prior experience with National List materials used at other locations.

________________________________________________________________________

________________________________________________________________________

What approved measures (preventative, mechanical and materials on the National List) have been explored prior to the use of these materials?
Sample Audit Trail for an Organic Product

You will need to develop an audit trail that is specific to your operation. Consider using documents associated with your procedure for a food safety product recall, if applicable.

This is an example of the type of information you might submit to accompany the H5.0 Audit Trail for Handlers form. This sample audit trail includes an invoice, a batch record, a receiving log, a bill of lading and an inventory record that are linked by lot numbers.

Contents:

A. Outgoing Invoice
   The invoice from the organic handler to the buyer shows the lot number of the finished product.

B. Batch Record
   The batch record shows both ingredient and finished product lot numbers.

C. Receiving Log
   The receiving log shows the ingredient lot numbers.

D. Incoming Bill of Lading
   The bill of lading for organic ingredients shipped from the supplier to the organic handler shows the ingredient lot numbers.

E. Inventory
   Finally, the inventory record shows on-hand inventory of both ingredients and finished products, and includes their lot numbers. When maintained regularly, it can be used to show that the quantity of organic ingredients you receive supports the quantity of organic product you sell.
Great Organics
All Organic, All The Time!
[Street Address]
[City, ST ZIP]
Phone: [000-000-0000]
Fax: [000-000-0000]

BILL TO
Smart Choices Food Store
[Street Address]
[City, ST ZIP]
[Phone]

<table>
<thead>
<tr>
<th>DESCRIPTION</th>
<th>TAXED</th>
<th>AMOUNT</th>
</tr>
</thead>
<tbody>
<tr>
<td>200 units Essential Organic Product</td>
<td>xx</td>
<td>xxx</td>
</tr>
</tbody>
</table>

SUBTOTAL $ -
Taxable $ -
Tax rate xx
Tax due xx
Shipping xx
TOTAL Due xxx

Make all checks payable to Great Organics

If you have any questions about this invoice, please contact [Name, Phone #, E-mail]

Thank You For Your Business!
Great Organics Batch Record

Batch Number: 082712Org  Date: 8/27/2012
Product Name: Organic Essential
Production Manager:

<table>
<thead>
<tr>
<th>Ingredient</th>
<th>Ingredient Lot No.</th>
<th>Amount Used</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td>abc</td>
<td>xxx</td>
<td></td>
</tr>
<tr>
<td>Y</td>
<td>82512</td>
<td>xx</td>
<td></td>
</tr>
<tr>
<td>Z</td>
<td>1234WPO1</td>
<td>xx</td>
<td>Used up last of this lot</td>
</tr>
<tr>
<td>Total Produced</td>
<td></td>
<td>xxx</td>
<td></td>
</tr>
</tbody>
</table>

Number of units produced: ________

Purge or Cleaning details: ________________________________
<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Vendor</th>
<th>BOL #</th>
<th>Lot #</th>
<th>Product Name</th>
<th>Amount Received</th>
<th>Initials/Date</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>8/20/2012</td>
<td>x:xx</td>
<td>Organic Ingredients, Inc.</td>
<td>101</td>
<td>abc</td>
<td>Ingredient X</td>
<td>1 box</td>
<td>Jane Receiver</td>
<td></td>
</tr>
<tr>
<td>8/20/2012</td>
<td>x:xx</td>
<td>Organic Ingredients, Inc.</td>
<td>101</td>
<td>82512</td>
<td>Ingredient Y</td>
<td>2 boxes</td>
<td>Jane Receiver</td>
<td></td>
</tr>
<tr>
<td>8/20/2012</td>
<td>x:xx</td>
<td>Organic Ingredients, Inc.</td>
<td>101</td>
<td>1234WPO1</td>
<td>Ingredient Z</td>
<td>1 box</td>
<td>Jane Receiver</td>
<td></td>
</tr>
</tbody>
</table>
Organic Ingredients Inc.

Bill of Lading

No.: 101

<table>
<thead>
<tr>
<th>FROM</th>
<th>TO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>Name</td>
</tr>
<tr>
<td>Joe Shipper</td>
<td>Jane Receiver</td>
</tr>
<tr>
<td>Basic Ingredients Warehouse 1</td>
<td>Great Organics</td>
</tr>
<tr>
<td>Date</td>
<td>City, State</td>
</tr>
<tr>
<td>08/20/12</td>
<td></td>
</tr>
</tbody>
</table>

Number of Packages | Kind of Package, Description of Articles, Special Marks, and Exceptions | Weight (Subject to Change) | Reference Numbers |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1 box Ingredient X</td>
<td></td>
<td>abc</td>
<td></td>
</tr>
<tr>
<td>2 boxes Ingredient Y</td>
<td></td>
<td>82512</td>
<td></td>
</tr>
<tr>
<td>1 box Ingredient Z</td>
<td></td>
<td>1234WPO1</td>
<td></td>
</tr>
</tbody>
</table>

Shipping Instructions | For Shipping Use Only
Check One | Payment | Method | Date |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Next Day</td>
<td>Shipper</td>
<td>Bill No.</td>
<td></td>
</tr>
<tr>
<td>Second Day</td>
<td>X</td>
<td>Shipped By</td>
<td></td>
</tr>
<tr>
<td>Routine</td>
<td>Recipient</td>
<td>Ship. Cost</td>
<td>Dept. Chgd</td>
</tr>
<tr>
<td></td>
<td>Third Party</td>
<td>COD Amt Due</td>
<td></td>
</tr>
</tbody>
</table>

Delivered by: Date
Received by: Date # Boxes

COMMENTS
Great Organics
Inventory Date:
Counted By:

This inventory sheet may be used to monitor your inventory of organic ingredients and/or finished products as required on the H5.0 Audit Trail for Handlers form Section A2.

Complete this sheet monthly or more frequently.

<table>
<thead>
<tr>
<th>Item</th>
<th>Ingredient</th>
<th>Product</th>
<th>Lot No</th>
<th>Unit</th>
<th>Unit Price</th>
<th>Inventory On Hand</th>
<th>Total $</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td>x</td>
<td>abc</td>
<td>box</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Y</td>
<td>x</td>
<td>82512</td>
<td>box</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Z</td>
<td>x</td>
<td>1234WPO1</td>
<td>box</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Essential</td>
<td>x</td>
<td>082712Org</td>
<td>8oz pack</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>