



CCOF

Organic Certification Education & Outreach Political Advocacy Promotion

Uncertified Handler Affidavit

This form applies to uncertified storage facilities used by CCOF operations to store unsealed product or product in permeable packaging.

This form also applies to uncertified brokers, traders, wholesalers, or distributors who take title or physical possession of organic products supplied to CCOF certified operations. It is not required for commission/fee brokers who do not take title or physical possession of organic products. It is not required for uncertified handlers supplying organic product in sealed, impermeable containers with final retail labeling that identifies the organic status and original certified producer. CCOF operations must work with their purchasing department to determine if uncertified suppliers are used.

- ▶ The uncertified handler must answer the questions below. If there is any change in the future, including a change in management of the uncertified handler, a new form must be submitted.
- ▶ Copies of the Uncertified Handler Affidavit (UHA) must be kept by both the CCOF certified operation and the uncertified handler. This form and any sample audit trail records will become part of the CCOF certified operation's Organic System Plan (OSP).
- ▶ CCOF certified operations will be billed an initial and annual fee for each Uncertified Handler Affidavit, outlined in the CCOF Certification Services Program Manual. CCOF certified operations can avoid this fee by sourcing from certified handlers.

Brokers, traders, wholesalers, distributors, and storage facilities are considered handlers per USDA NOP § 205.2 "Handle, Handler". NOP § 205.101(b)(1) and [NOP Guidance 5031](#) requirements for handling unpackaged organic products do not require certification of broker/trader/wholesaler/distributor/storage facilities if organic products are packaged or otherwise enclosed in a container prior to being received or acquired. Organic products must remain in the same package or container and may not be repacked or re-labeled while in the control of the uncertified handler.

CCOF operation using this uncertified handler: _____

Uncertified Handler: _____

Manager/Owner: _____

Email: _____

Phone: _____ Website: _____

Address: _____

Type of uncertified handler (check all that apply): Dry storage Cold storage Freezer storage Broker Trader
 Wholesaler Distributor Other (Describe): _____

A. Uncertified Handler Eligibility

CCOF can approve uncertified handlers only if the uncertified handler qualifies for the exclusion from certification requirements and audit trail information traces the product back to the last certified organic operation. For uncertified brokers, traders, wholesalers, or distributors who use uncertified storage locations, answers below must reflect activities at uncertified storage locations as well as your own activities. If unclear, CCOF may require that your uncertified facility complete this form.

- | | Yes | No |
|---|--------------------------|--------------------------|
| 1. Do you ever handle any organic products that are not enclosed in a package or container when you receive them? | <input type="checkbox"/> | <input type="checkbox"/> |
| a. If yes, describe: _____ | | |
| 2. Do you ever combine or split loads of bulk/unpackaged products? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Do you ever open packages or containers of organic products? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Do you ever relabel, package, or apply any label that obscures the original label or lot number/code? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Do you ever repack, sort, recondition, cull, ice, hydro cool, hydro vacuum, or otherwise process organic product in any way? <i>Repacking includes placing product into other packaging.</i> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Do you ever apply any substance to the organic product including water, ethylene, or controlled atmosphere treatment? | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Does organic product ever contact cleaners, sanitizers, pest control materials, nonorganic products, water that has contacted nonorganic products, or other prohibited materials while under your control? | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. Is the organic product packaged or enclosed in a container prior to being received and does it remain in that enclosed container while under your control? | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Broker, trader, wholesaler, distributor – Describe how frequently you change organic suppliers:
_____ | | |





CCOF

Organic Certification Education & Outreach Political Advocacy Promotion

Yes No

10. Do your audit trail records for each shipment include the information described below? You may attach sample documents to demonstrate your system; all records must be provided to the CCOF certified operation. If you have an alternative way to provide a complete traceback to the last certified handler, attach a description. * Yes No

To be excluded from certification, the answer to questions 1-7 must be "NO", questions 8 and 10 must be "YES." Question 9 must be complete for brokers, traders, wholesalers, and distributors.

* CCOF certified operations may only source from uncertified handlers who provide full supplier traceability back to the last certified operation for each shipment. CCOF considers the following to be essential for traceability:

- Purchase invoices, BOL, and other audit trail records must designate products as organic and include a description of the product and amount transferred.
- The last certified operation must be listed on invoices and/or lot numbers applied by the last certified operation must match lot numbers on uncertified handler audit trail records.
- For each delivery, uncertified handlers must provide a complete, current organic certificate for the last certified operation.
- Documents generated by the last certified operation proving purchase/delivery/transfer to the uncertified handler must be provided to the CCOF certified operation. Uncertified handler audit trail records must link directly back to the last certified operation, including transport, storage, processing/handling, shipping, and/or distribution.
- All certified suppliers must be approved by CCOF as part of the certified operation's Organic System Plan (OSP).

CCOF certified operations must maintain records sufficient to demonstrate compliance, verified at inspections. If CCOF inspectors cannot track organic product back to the last certified operation, sourcing organic products from the uncertified handler may be considered a noncompliance if issues are not resolved.

B. Uncertified Handler Statement

I, the owner or legally authorized representative, attest that I am qualified to assess the validity of the statements in this affidavit and the statements are true and accurate to the best of my knowledge.

I acknowledge the above requirements for audit trail records and disclosure to the CCOF certified operation and understand that failure to meet the audit trail record requirements or disclose records to the CCOF certified operation may be cause for CCOF to rescind approval of my operation as an approved uncertified organic handler and may be cause for compliance action against the CCOF certified entity.

Name (Manager/Owner of Uncertified Handler)	Signature	Date
---	-----------	------

Certification of broker/trader/wholesaler/distributor/storage facilities is straightforward and allows you to protect the identity of your suppliers. Visit www.ccof.org to apply for certification. Questions about the certification process? Email getcertified@ccof.org.

CCOF reserves the right to inspect any facility storing or handling organic product owned by a CCOF certified operation per NOP 205.400. If the uncertified handler misrepresents policies or procedures as stated on this affidavit or acts in a manner that might jeopardize organic integrity or tracking of the organic product, the CCOF client using the uncertified handler will be notified. The CCOF client will be held responsible for correcting any noncompliance issues. CCOF will report uncertified handlers who are not excluded to the USDA NOP for investigation and potential civil penalties.

CCOF Decision:

- Requires certification. Not approved until certificate provided.
- Excluded supplier; certification not required. Must provide full audit trail for each shipment. \$150 annual fee
- Excluded storage location, certification not required. \$50 annual fee

