

NOSB ITEM FOR PUBLIC COMMENT

The National Organic Standards Board (NOSB) is seeking public comment on recommendations regarding “**Organic Handling Plan**” until November 29, 2002. With respect to receipt of comments by the NOSB during the comment period, the following provisions have been established to ensure that your comment has the greatest probability of being received and reviewed by the Board:

- **Mail:** Persons may submit comments on listed Board recommendations by mail to: The National Organic Standards Board; c/o Katherine Benham; Room 4008 - South Building; 1400 and Independence Avenue, SW; Washington, D.C. 20250-0001.
 - **E-mail:** Comments may be sent via internet to respective Board committees by submitting an E-mail to Board committee E-mail accounts provided with each recommendation.
 - **Fax:** Comments may be submitted by fax to (202) 205-7808.
 - Clearly indicate if you are for or against the Board recommendation or some part of it and why. Include recommended wording changes as appropriate.
 - Include a copy of articles or other references that support your comments. Only relevant material should be submitted.
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Organic Handling Plan

Many certifying agents and handling operations have expressed a need for guidance concerning organic production and handling requirements. In an effort to meet organic industry needs, guidance documents have been developed to assist the certification of handling operations.

Recommendation:

The Processing Committee recommends this Organic Handling Plan be forwarded to the National Organic Program for posting on the NOSB page of the NOP website as a guidance document for the certification of organic handling operations.

Organic Handling Plan

Please fill out this questionnaire if you are requesting organic handling certification. This form or an update short form may be used for continuation of certification, depending on the policies of the certifying agent. Attach an Organic Product Profile sheet for each product requested for certification, and a current schematic product flow chart and facility map for each facility which will handle organic products. Use additional sheets if necessary.

SECTION 1: General Information				NOP Rule 205.201 and 205.401	
Applicant/company name			Organic certification number		
Owner/manager		Primary contact person		For office use only	
Address				Date received	
				Date reviewed	
				Reviewer initials	
City	State/province	Postal/zip code	Country		Fees received
Inspector					
Legal status: <input type="checkbox"/> Sole proprietorship <input type="checkbox"/> Corporation <input type="checkbox"/> Cooperative <input type="checkbox"/> Trust or non-profit <input type="checkbox"/> Legal partnership (federal form 1065) <input type="checkbox"/> Other (specify)					
Year company began	Number of employees	Name of person overseeing organic production		Government permits/licenses	
Do you have a copy of current organic standards? <input type="checkbox"/> Yes <input type="checkbox"/> No			Do you understand the current organic standards? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Do you have a copy of the current National List? <input type="checkbox"/> Yes <input type="checkbox"/> No			<input type="checkbox"/> Yes <input type="checkbox"/> No		
What general categories of organic products are manufactured or planned to be manufactured? <i>Provide a complete list of products requested for certification in Section 2: Product Composition and Labeling.</i>					
List all noncompliances from last year's certification and state how the noncompliances have been addressed. <input type="checkbox"/> Not applicable					
List previous years certified organic and name of certifying agent.			List current organic certification by other agents.		
Has certification ever been denied, suspended, or revoked? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe the circumstances. <i>Attach a description of the actions taken to correct noncompliances.</i>					
Preferred time for inspection visit: <input type="checkbox"/> Morning <input type="checkbox"/> Afternoon Give directions to the processing facility.					
Type of processing/handling operation, e.g. grain cleaning, canning, freezing		Is your operation a: <input type="checkbox"/> Primary, or <input type="checkbox"/> Contract vendor		Estimated annual total production _____ % organic _____ % nonorganic	
IF YOU USE CONTRACT VENDORS, GIVE THE FOLLOWING INFORMATION:					
NAME OF CONTRACT VENDOR	ADDRESS		PHONE NO.		CERTIFIED BY
List or attach a list stating the general categories of nonorganic products produced by your company.					

The NOP Rule has 4 categories of products which can use the word "organic". These are "100% organic", "organic", "made with organic (specified ingredients or food group(s))", and products with less than 70% organic ingredients. The % of organic ingredients is calculated by dividing the total net weight or volume (excluding salt and water) of combined organic ingredients by the total weight or volume of all ingredients (excluding salt and water). All ingredients identified as "organic" in the ingredient list must be certified by an accredited certifying agent. Ingredients sourced from non-certified exempt or excluded operations must not be identified or used as organic ingredients.

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

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

The USDA seal can be used on "100% organic" or "organic" products, but not on products labeled "made with...". A certifying agent's seal, logo or other identifying mark can be used on "100% organic," "organic" or "made with...". Products with less than 70% organic ingredients cannot use either the USDA seal or the certifying agent's name, seal or logo. The certifying agent's seal cannot be displayed more prominently than the USDA seal.

Attach an Organic Product Profile sheet and examples of all labels used for each product requested for certification.

A. PRODUCTS LABELED AS "100% ORGANIC" (All ingredients are certified 100% organic, including processing aids.)

List all products labeled or planned to be labeled as "100 % Organic" and check appropriate boxes. None

NAME OF PRODUCT	ORGANIC INGREDIENTS IDENTIFIED IN INFORMATION PANEL (✓)	CERTIFYING AGENT NAME IDENTIFIED ON LABEL (✓)	USE USDA SEAL ON LABEL (✓)	USE CERTIFYING AGENT SEAL/LOGO ON LABEL (✓)

B. PRODUCTS LABELED AS "ORGANIC" (at least 95% certified organic ingredients)

List all products labeled or planned to be labeled as "Organic" and check appropriate boxes.

None

NAME OF PRODUCT	ORGANIC INGREDIENTS IDENTIFIED IN INFORMATION PANEL (✓)	CERTIFYING AGENT NAME IDENTIFIED ON LABEL (✓)	USE USDA SEAL ON LABEL (✓)	USE CERTIFYING AGENT SEAL/LOGO ON LABEL (✓)

SECTION 2: Labeling and Product Composition B. PRODUCTS LABELED AS "ORGANIC" (continued)

Are any nonorganic agricultural ingredients used?

Yes No

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

If yes, describe your attempts to source organic ingredients.

Are sulfites, nitrates, or nitrites added during the production or handling process?

Yes No

If yes, list all organic products produced with sulfites, nitrates, or nitrites.

Do any products labeled "organic" show the percentage of organic ingredients on the label?

Yes No

If yes, list all products so labeled.

Does the size of the percentage statement exceed one-half the size of the largest type size on the panel on which the statement is displayed?

Yes No

Does the percentage statement appear in its entirety in the same type size, style, and color without highlighting?

Yes No

Is the percentage rounded down to the nearest whole number?

Yes No

C. PRODUCTS LABELED AS "MADE WITH ORGANIC (SPECIFIED INGREDIENTS OR FOOD GROUP(S))" (At least 70% certified organic ingredients; up to 3 ingredients or food groups can be listed)

List all products to be labeled "Made with organic (ingredients or food group(s))" and check appropriate boxes.

None

NAME OF PRODUCT	HOW MANY INGREDIENTS OR FOOD GROUPS ARE LISTED ON THE LABEL?	LIST EACH INGREDIENT OR FOOD GROUP ¹ SHOWN ON THE PRINCIPAL DISPLAY PANEL	ORGANIC INGREDIENTS IDENTIFIED IN INFORMATION PANEL (✓)	CERTIFYING AGENT NAME IDENTIFIED ON LABEL (✓)	CERTIFYING AGENT SEAL/LOGO ON LABEL (✓)

Does the "made with organic ingredients" statement on the principal display panel exceed one-half the size of the largest type size on the panel?

Yes No

Does the "made with organic ingredients" statement on the principal display panel appear in its entirety in the same type size, style, and color without highlighting?

Yes No

Do any products labeled "made with organic ingredients" show the percentage of organic

¹ Choose from the following food group listings: beans, fish, fruits, grains, herbs, meats, nuts, oils, poultry, seeds, spices, sweeteners, vegetables, or processed milk products.

ingredients in the product?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does the size of the percentage statement exceed one-half the size of the largest type size on the panel on which the statement is displayed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the percentage statement appear in its entirety in the same type size, style, and color without highlighting?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the percentage rounded down to the nearest whole number?	<input type="checkbox"/> Yes <input type="checkbox"/> No

D. PRODUCTS WITH LESS THAN 70% ORGANIC INGREDIENTS (organic ingredients listed only on the information panel)

List all products which contain less than 70% organic ingredients. None

SECTION 2: Labeling and Product Composition (continued)

E. BY-PRODUCTS

Will any by-products from certified organic products be sold as certified organic? Yes No Not applicable

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

*Include information on organic by-products as applicable on this Organic Handling Plan.
Attach an Organic Product Profile sheet for each product.*

F. WATER

Check ways water is used in processing: None used

ingredient processing aid cooking cooling product transport cleaning organic products
 cleaning equipment other (specify)

Source of water: municipal on-site well other, specify

Does the water meet the Safe Drinking Water Act? Yes No

Attach copy of water test, if applicable.

What on-site water treatment processes are used? None

Is steam used in the processing or packaging of organic products? Yes No

If yes, describe how steam is used.

If steam has direct contact with organic products, do you use: No direct contact

steam filters condensate traps testing of condensate testing of finished products
 other (specify)

List products used as boiler additives. No boiler additives used

Attach MSDS and/or label information for boiler additives, if applicable.

Describe how you monitor water quality.

How often do you conduct water quality monitoring? weekly monthly annually as needed
 other (specify)

SECTION 3: Assurance of Organic Integrity NOP Rule 205.201(a), 205.270 and 205.272

NOP Rule requires that handling practices and procedures present no contamination risk to organic products from commingling with nonorganic products or contact with prohibited substances. Packaging materials, bins, and storage containers must not have contained synthetic fungicides, preservatives, or fumigants. Reusable bags or containers must be clean and pose no risk to the integrity of organic products. Procedures used to maintain organic integrity must be documented.

A. PRODUCT FLOW

Attach a complete written description or schematic product flow chart which shows the movement of all organic products, from incoming/receiving through production to outgoing/shipping. Indicate where ingredients are added and/or processing aids are used. All equipment and storage areas must be identified.

B. ORGANIC INTEGRITY

Do you have an organic integrity program in place to address areas of potential commingling and/or contamination? Yes No

If yes, list specific control points you have identified in your process and state how you have addressed them to protect organic integrity, or *attach a copy of your organic integrity program.*

If no, do you have plans to implement an organic integrity program? Yes No

C. MONITORING

Do you have a Quality Assurance program in place? Yes No

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

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

If yes, name of company

Product testing: (Check all that apply)

- ingredients tested prior to purchase ingredients tested upon receipt products tested during production
- finished products tested other (specify)

SECTION 3: Assurance of Organic Integrity C. MONITORING (continued)

How do you prevent the use of ingredients produced using excluded methods (genetic engineering), sewage sludge, or ionizing radiation? (Check all that apply)

- GE testing letters from manufacturers other (specify)

Are ingredient samples retained? Yes No

If yes, how long?

Are finished product samples retained? Yes No

If yes, how long?

Do you have a product recall system in place? Yes No

D. EQUIPMENT

List all equipment used in processing.

EQUIPMENT NAME	CAPACITY	CHECK IF EQUIPMENT IS CLEANED PRIOR TO ORGANIC PRODUCTION (✓)	CHECK IF CLEANING IS DOCUMENTED (✓)	CHECK IF THE EQUIPMENT IS PURGED PRIOR TO ORGANIC PRODUCTION (✓)

If equipment is purged, list and describe purge procedures, quantities purged, and documentation.

E. SANITATION

Attach MSDS and/or label information for cleaning and sanitizing products, if applicable.

Check all cleaning methods used:

- sweeping scraping vacuuming compressed air manual washing clean in place (CIP)
- steam cleaning sanitizing other (specify)

Provide information on your cleaning program and products used.

AREA	TYPE OF CLEANING	CLEANING EQUIPMENT USED	PRODUCTS USED	FREQ	CHECK IF CLEANING IS DOCUMENTED (✓)
Receiving area					
Ingredient storage					
Product transfer					
Production area					
Production equipment					
Packaging area					
Finished product storage					
Loading dock					
Building exterior					
Accidental spills					
Other (specify)					

Are all surfaces which contact organic products food grade? Yes No
Do you test food contact surfaces or rinsate for cleaner/sanitizer residues? Yes No
Where are cleaning/sanitizing materials stored?

SECTION 3: Assurance of Organic Integrity (continued)

F. PACKAGING

Check types of packaging material used: paper cardboard wood glass metal foil
 plastic waxed paper aseptic natural fiber synthetic fiber other (specify)

Where are packaging materials stored?

Are any fungicides, fumigants, or pest control products used in this storage area? Yes No
 If yes, describe use and list specific products.

Have any packaging materials been exposed to synthetic fungicides, preservatives, or fumigants? Yes No
 If yes, describe exposure, including name of products used.

Are packaging materials reused? Yes No
 If yes, describe how reusable packaging materials are cleaned prior to use.

G. STORAGE

Provide information on your storage areas by completing the following table.

USE	LOCATION	TYPE/CAPACITY	IDENTIFICATION NAME OR NUMBER	IS STORAGE UNIT DEDICATED ORGANIC ? (✓)	COMMENTS ON POTENTIAL FOR CONTAMINATION OR COMMINGLING PROBLEMS
Ingredient storage					
Packaging material storage					
In-process storage					
Finished product storage					
Off-site storage*					
Other (specify)					

***If there is off-site storage, give name, address, phone number, contact person and type of products stored at off-site facility.**

H. TRANSPORTATION OF ORGANIC PRODUCTS

Incoming:

In what forms are incoming products received?

- dry bulk liquid bulk tote bags tote boxes metal drums cardboard drums paper bags
 foil bags other (specify)

How are incoming products transported?

Do you arrange incoming product transport?

Yes No

If you use transport companies, have they been notified of organic handling requirements?

Yes No

Are transport units used to carry nonorganic products or prohibited substances?

Yes No

If yes, how do you insure that inbound transport units are cleaned prior to loading organic products?

Is the inspection/cleaning process documented?

Yes No

Are organic products shipped at the same time as nonorganic in the same transport units?

Yes No

If yes, check all steps taken to segregate organic products:

- use of separate pallets pallet tags identifying "organic" organic product shrink wrapped
 separate area in transport unit organic product sealed in impermeable containers
 other (specify)

SECTION 3: Assurance of Organic Integrity H. TRANSPORTATION (continued)

In-Process:

How are in-process products transported?

How do you insure that in-process transport units are cleaned prior to loading organic products?

Is the inspection/cleaning process documented?

Yes No

Outgoing Finished Product:

In what form are finished products shipped?

- dry bulk liquid bulk tote bags paper bags foil bags metal drums cardboard drums
 mesh bags cardboard cases plastic crates other (specify)

How are outgoing products transported?

Do you arrange outgoing product transport?

Yes No

If you use transport companies, have they been notified of organic handling requirements?

Yes No

Are transport units used to carry nonorganic products or prohibited materials?

Yes No

If yes, how do you insure that outgoing transport units are cleaned prior to loading organic products?

Is the inspection/cleaning process documented?

Yes No

Are organic products shipped at the same time as nonorganic in the same transport units?

Yes No

If yes, check steps taken to segregate organic products:

- use of separate pallets pallet tags identifying "organic" organic product shrink wrapped
 separate area in transport unit organic product sealed in impermeable containers other (specify)

SECTION 4: Pest Management**NOP Rule 205.271**

NOP Rule requires management practices to prevent pests, such as removal of pest habitat, food sources, and breeding areas, and prevention of access to handling facilities. Environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, may be used to prevent pests. Pests may be controlled using mechanical or physical means, such as traps, light, or sound. Lures and repellents may be used if they do not contain prohibited substances or products produced using excluded methods (genetically engineered). If these measures are not effective, a synthetic substance not on the National List may be used provided the certifying agent approves use of the substance, method of application, and measures taken to prevent contact with ingredients or organic products. Use of pest control products must be documented and included as part of the Organic Handling Plan.

Attach a facility map showing the location of traps and monitors, and submit MSDS and/or label information for substances used for pest control, if applicable.

What type of pest management system do you use?

- in-house: name of responsible person
 contract pest control service: name, address, phone number

Check all pest problems you generally have:

- flying insects crawling insects rats mice spiders birds other (specify)

Check all pest management practices you use:

- good sanitation removal of exterior habitat/food sources clean up spilled product exclusion
 sealed doors and/or windows repair of holes, cracks, etc. screened windows, vents, etc.
 physical barriers sheet metal on sides of building exterior mowing air curtains air showers
 positive air pressure in facility monitoring incoming ingredient inspection for pests
 inspection zones around interior perimeter ultrasound/light devices release of beneficials sticky traps
 electrocutors pheromone traps mechanical traps scare eye balloons freezing treatments
 heat treatments vacuum treatments carbon dioxide nitrogen vitamin baits pyrethrum
 ryania rotenone boric acid disodium octal tetrahydrate diatomaceous earth
 precipitated silica fumigation fogging crack and crevice spray other (specify)

SECTION 4: Pest Management (continued)**Are records kept of your pest monitoring activities?** Yes No**Check all aspects of your waste management system that apply:**

- on-site dumpster material recycling daily pick-up of waste composting field application of waste
 other (specify)

Does your waste management system provide habitat and/or food sources for pests? Yes No

If yes, please describe.

Pesticide use information for the last 12 months:

SUBSTANCE	TARGET PEST	LOCATION WHERE USED	METHOD OF APPLICATION	DATE OF LAST APPLICATION

Are records kept of all pesticide applications? Yes No
 If a pest control substance is used, list all measures taken to prevent contact with organic products, ingredients or packaging materials.

Are any substances used which are prohibited according to the National List? Yes No
 If yes, did you contact the certifying agent for prior approval before using? Yes No
 If prohibited pest control products were used, what measures are you taking or planning to take to prevent their use in the future?

Are there any substances intended for use which are not listed above? Yes No
 If yes, list substances intended for use:

SECTION 5: Record Keeping

NOP Rule 205.103

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

Which of the following records do you keep for organic processing/handling?

Incoming:

- purchase orders contracts invoices receipts bills of lading Customs forms scale tickets
- quality test results Certificates of Analysis Transaction Certificates
- copies of Certificates of Organic Operation verification of non-GMO ingredients
- verification of ingredients produced not using sewage sludge
- verification of ingredients produced/handled without ionizing radiation
- documentation that organic ingredients are not commercial available, when using nonorganic ingredients in products labeled as "100% organic" and/or "organic"
- receiving records receiving summary log (12 mos.) other (specify)

In-Process:

- ingredient inspection forms blending reports production reports equipment clean-out logs
- sanitation logs packaging reports QA reports production summary records (12 mos.)
- other (specify)

Storage:

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

Organic Product Profile

Applicant/company name		Date	Name of Product Requested for Certification						Percentage of Organic Ingredients²	%
Check which labeling category this product meets. <i>Attach samples of labels for all products for which this Organic Product Profile is used.</i> <input type="checkbox"/> "100% organic" <input type="checkbox"/> "organic" (≥95% organic ingredients) <input type="checkbox"/> "made with organic (ingredients or food group(s)) (≥70% organic ingredients)										
Product Composition: Complete the information for all ingredients contained in this product. Although water and salt are not considered when determining the percentage, include information about these ingredients.										
INGREDIENT ³ (INCLUDE ADDITIVES)	CHECK IF INGREDIENT IS CERTIFIED ORGANIC (✓)	SUPPLIER	CERTIFYING AGENT	IF NON-AGRICULTURAL, CHECK IF INGRED. IS ON THE NATIONAL LIST (✓)	HAVE YOU VERIFIED THAT THE NONORGANIC INGREDIENT WAS NOT PRODUCED USING ANY OF THE FOLLOWING (✓):			CHECK IF YOU HAVE DOCUMENTATION THAT THE NONORGANIC AGRICULTURAL INGREDIENT WAS NOT COMMERCIALY AVAILABLE ⁵ IN ORGANIC FORM (✓)	% OF FINISHED PRODUCT	
					EXCLUDED METHODS ⁴	SEWAGE SLUDGE	IONIZING RADIATION			
Does this product include organic and nonorganic forms of the same ingredient?⁶								<input type="checkbox"/> Yes	<input type="checkbox"/> No	
If yes, list the specific organic and nonorganic forms of the same ingredient.										
Processing Aids: Provide complete information about all processing aids used in the manufacture of this product.										
PROCESSING AID	CHECK IF PROCESSING AID IS CERTIFIED 100% ORGANIC ⁷ (✓)	IF NONORGANIC, CHECK IF PROCESSING AID IS ON THE NATIONAL LIST? (✓)			SUPPLIER	CERTIFYING AGENT				

² Calculate the percentage of organic ingredients by dividing the total net weight or volume of combined organic ingredients (excluding water and salt) by the total weight or volume of all ingredients (excluding water and salt).

³ All products labeled "100% organic" or "organic" and all ingredients identified as "organic" in an ingredient statement must not be produced using: excluded methods; sewage sludge; ionizing radiation; a processing aid not on the National List; or sulfites, nitrates or nitrites added during the production or handling process (except that wine containing added sulfites may be labeled "made with organic grapes").

⁴ Excluded methods include cell fusion, microencapsulation and macroencapsulation, and recombinant DNA technology, (gene deletion, gene doubling, introducing a foreign gene, and changing the positions of genes when achieved by recombinant DNA technology).

⁵ For products labeled as "100% organic" and "organic", handlers are required to source organic ingredients when commercially available. Commercial availability is determined by three factors: appropriate form, quality, or quantity. This is not required for products labeled as "made with....".

⁶ Products labeled "organic" or "made with..." must not include organic and nonorganic forms of the same ingredient, except that a nonorganic ingredient in a product labeled "made with..." may contain organic and nonorganic forms of the same ingredient. This ingredient must not be labeled "organic" on the ingredient statement or be counted in the calculation of the product's organic %.

⁷ Required for products labeled as "100% organic".