



TS34 (EC-NOP) v05 en - Information for OSP-Unit Description



Organic System Plan (OSP) – NOP Unit Description – EOS

Information and documents required



According to **§ 205.401 (a) in the USDA NOP standard**, an operation seeking for certification must submit an **organic production or handling system plan (OSP)** and, once certified, shall annually, as applicable, send to the certifying agent an updated OSP as required in **205.406 (a)**.

According to **chapter (B) 1 & 2 of Title VIII** of the ECOCERT Organic Standard, a certified operation shall update, as applicable, any change in the **unit description or concerning practical measures taken to ensure compliance with the organic production rules**.

According to **§ 205.406 (a) (3) in the USDA NOP**, when applicable, an update on corrective actions for minor non-compliances previously identified must be sent to the certifying agent.

**Any change to your OSP or Unit Description must be notified to Ecocert.
In case the changes are only noted during the inspection,
this is to be reported in the notice of non-compliance.**

An OSP/Unit description shall include all information and documents that are necessary for the verification of the possible conformity of your organic operations before the inspection. An OSP must meet the requirements set forth in **§205.201**. You will find below a non-exhaustive list of information and documents to be included in the Organic System Plan / Unit description according to your activities:

1. Description of practices and procedures
2. List of all substances used.
3. Description of monitoring practices & procedures
4. Recordkeeping system
5. Management practices to prevent commingling and contamination
6. Other information deemed necessary.

The implementation of the procedures described within the OSP/Unit Description will be verified during the inspection.

Please find below the details about information and documents to provide to ECOCERT when applicable.

1. Description of practices and procedures

- Practices to protect and promote biodiversity
- Procedures for notifying neighbors and road departments to prevent contamination of organic crops
- Tillage practices
- Cultivation practices
- Crop rotation practices
- Pest management practices
- Procedures for obtaining organic seeds
- Wild crop management practices
- Livestock health care practices

- Harvest and transportation practices including equipment cleanout to prevent contamination
- Storage practices
- Processing methods including equipment cleanout to prevent contamination
- Labeling procedures
- Procedures for obtaining organic ingredients
- Derogation request for use of non-organic seeds/vegetative propagating material (VPM) or ingredients when applicable

2. List of all substances used

A list of each substance to be used as a production or handling input must be included:

- Composition
- Source
- Location where it will be used
- Commercial availability
- Compost
- Manure
- Fertilizer/Soil amendments
- Crop production aids
- Pest control inputs
- Livestock feed
- Livestock feed additives and supplements
- Livestock health care products
- Post-harvest materials
- Food additives and processing aids
- Flavors, microorganisms
- Agricultural ingredients
- Cleaning agents
- Seeds/VPM/seedlings

3. Description of monitoring practices & procedures

Organic operation should explain in the OSP the practices they use to manage their activity. It is particularly important to describe all management and control practices, called monitoring practices, used to prevent occurrence of problems.

For example, apple growers may have plans to monitor codling moth, and asparagus growers may have plans to manage asparagus aphids. Also, crop growers may have and keep soil test results as a means of monitoring the effects of the farming practices.

Below are some other examples of monitoring practices that may be used by organic operations depending on its activity:

- Regular field visits to identify soil and/or plant problems
- Soil testing (e.g. testing for organic matter content)
- Monitoring soil moisture or monitoring water quality
- Product quality testing
- Monitoring crop or pasture quality

- Use of body conditioning scores for monitoring herd health
- Pest monitoring
- Procedures used to monitor chlorine levels in the wash water

Organic operation should describe all its monitoring practices, including the frequency with which they will be performed, to verify that the system plan is effectively implemented.

4. Recordkeeping system

Organic operations must maintain a transparent and traceable recordkeeping system.

a) The farm map:

- It must be accurate
- Borders/ boundaries are clearly marked by fence signs roads, etc.
- Shape and size accurate
- Must clearly identify adjoining land use
- Uncultivated (e.g. woods)
- Conventional (identify crop)
- Buffer zones: If necessary should be on the map, indicated by size of buffer zone and whether there are any mitigating factors (e.g. row of trees)

b) Records for verification of land use history:

- Evidences of non-application of prohibited inputs
- Evidences permitting to verify the history of the land/fields

c) Records for organic crop production:

- Seeds & Transplants (including cover & pasture)
- Receipts of seeds & transplants delivered to farm
- Invoices for seeds & transplant purchases
- Phone logs of attempts to obtain organic seed & transplants
- Seed catalogs
- Letters from seed suppliers related to availability of organic seed
- Organic certificates for organic seeds, VPM and seedling purchased
- Non treatment attestation for non organic seeds and propagating materials
- Non GMO, non-irradiation and non-sewage sludge attestations when applicable for all non-organic inputs to be used

For seed savers:

- harvest records showing production of organic seed
- Seed treatment records
- Verification from supplier that non-organic seed is not genetically modified. (Only for seeds that have commercially available GMO seeds . . . e.g. corn, soybeans, sugar beets)

d) Records for organic crop production and harvest/storage:

- Farm activity log
 - o Fertilizers : date of application, type and amount, parcels concerned
 - o Plant protection products : reason and date of treatment, type of product, method of treatment, parcels concerned
- Invoices for contracted services (e.g. seeding mowing, spreading manure)
- Records of cultivation practices, weeding and planting dates

- Compost production records
- Yield records (e.g. pounds harvested, weight tickets, boxes harvested)
- Receipts from processor or warehouse for delivery of organic product
- Custom harvest records

e) Clean transport affidavit:

- Attestation from transport companies
- Recording of cleaning activities

f) Records for organic crop production- Sales Records:

- Deposit records, ledgers, receipts
- Purchase orders
- Invoices
- Sales summaries from wholesalers or processors

g) Records for organic livestock production

Feed records:

- Organic verification for all purchased feed, including grain, hay, or silage (copy of organic certification)
- Grain invoices
- Records of purchased feed supplements, and animal health care products
- Feeding records
- Harvest & storage records for feed grown on farm, labels & purchase records

Origin of Livestock Records:

- Breeding, birthing and weaning records (e.g. calendar, chart, notebook)
- Invoices, receiving records, and organic certification for all purchased animals
- Identification of livestock (individually, by batch)

Animal health care records:

- Loss/cull records
- Medication records (type and date of treatment, veterinary prescription, details of diagnosis, posology, active pharmacological substances used, withdrawal period)
- Vaccinations

Livestock Living Conditions & Pasture Records:

- Animal Identification records
- Grazing records
- Records of inclement weather
- Temporary confinement records (with description of what allowable condition existed)
- Pasture rotation records
- Periods of access to free range areas (pasture), periods of transhumance
- Calculation of DMD and DMI
- Manure spreading plan

Production Records:

- Date, age & weight at slaughter
- Milk production records
- Egg production records

h) Organic handler & processor records:

Receiving Records: (records that verify product received as organic and amount)

- Organic certificate for each product/ingredient received

- Clean truck affidavit for bulk product (verify truck was clean prior to hauling)
- Invoices, PO's, bill of lading, scale ticket
- Handler organic certificates and contracts
- Certificates of Analysis or Product Specification Sheets (additive, processing aids...)
- Raw Product inventory reports and records
- Weight tickets, receipts, tags

Storage & Production Records: (describe handling and processing activities)

- Non-organic ingredient records
- Recipes & product formulation
- Ingredient usage reports & production logs
- Quality control records
- Reconditioning, shrinkage, & dumping records
- Container, storage and processing area records
- Purchased inputs, including ingredients, sanitizers, food contact substances, packaging, pest management materials
- Inventory reports/Packaging reports
- **Labels of certified products**

Shipping Records - verify type & amount of organic product shipped

- Pallet/tote tickets & sale tickets
- Certificate of analysis
- Purchase orders & sale journals
- Finished product inventory report & records
- Shipping logs & bills of lading
- Export records & certificates of inspection and/or of transaction
- Sales, accounts payable, accounts receivable, and cash disbursement journals
- Broker's contracts and statements
- Phytosanitary certificates

5. Management practices to prevent commingling and contamination

- Buffer zones to prevent contamination
- Establishment of a physical barrier (e.g. row of trees) to prevent drift of prohibited substances.

Management practices should show verification of adjoining land:

- Adjoining land use
- Natural areas and non-cultivated areas – no buffer required
- How pesticides are applied in adjoining land can determine the size of buffer zone
- Backpack sprayer
- Boom sprayer
- Airblast or speed sprayer
- Aerial application
- Type of materials applied
- Mosquito control often uses fogging sprays that are designed to drift
- Procedures for notification of neighbors and road departments
- Procedures for identifying organic products during harvest, post-harvest handling, shipping, processing and distribution

6. Other information deemed necessary

This may include:

- Name(s) of previous certifying agent(s) and years applied.
- Results of previous applications for certification. (Copies of denial of certification, non-compliances, and/or other adverse action notices).
- A description of actions taken to correct non-compliances, plus evidence of corrective action.
- Any other information deemed necessary to verify the compliance of your organic operations.

Any change to your OSP or Unit Description must be notified to ECOCERT.

Each new label or changes to labels must be sent to Ecocert for approval before being used on products.

CONTACT & INFORMATION

You will find more information on **ECOCERT** homepage: www.ecocert.com (EOS, guidelines, certification, certified inputs, other activities...)

The **United States Department of Agriculture** (USDA) for information about NOP certification: <https://www.ams.usda.gov/about-ams/programs-offices/national-organic-program>

The **European community website:**

http://ec.europa.eu/agriculture/organic/splash_en will give you all important information about the EC organic production (EC regulations, European Logo and its use, database about organic seeds suppliers,...)

The **Organic Europe** homepage will provide statistics, reports about organic agriculture, information on each EC country and many useful addresses. <http://www.organic-europe.net/>

If you need further information, we stay at your disposal for technical questions.