



Guideline No 7 preparation of NOP audit

TS07(NOP)V05en

According to the USDA National Organic Program (NOP)



This guideline does not replace the current Regulation.
It provides some explanations on main requirements for organic handling and labeling.
To know the main organic requirements, it is necessary to download and read carefully
the NOP Regulation available on the USDA website:

<http://www.ams.usda.gov/AMSV1.0/NOP>



A certified operation must maintain records concerning the production, harvesting, and handling of organic products (§ 205.103). These records must be adapted to the business conducted, and fully disclose all activities and transactions in sufficient detail as to be readily understood and audited.

To facilitate the **auditor's work**, please keep the following documents – as far as applicable - ready for your audit. Many of these documents are also part of the Organic System Plan.

I. AUDIT OF CROP

- Field maps indicating contamination risks and buffer zones
- Maps of storage sites
- Field history with information about all inputs used during the last three years (for a first inspection)
- Rotation plan (if applicable)
- Field records describing all on-farm activities
- Harvest records
- Analysis results of soil or product samples (if done)
- Input documentation (purchase of seeds, fertilizers, etc.)
- Sales documentation (products, quantities, clients, labeling)

II. AUDIT OF WILD CROP

Prior to the first audit, operator responsible for the project must draw out a full description of the project, its unit, and operations (including conventional operations located in the same area) **by filling in the Organic System Plan**. The form shall be updated and sent to Ecocert every year before the following campaign, however any change in the project all along the year (e.g. collection of new plants, new collection areas, change in the list of collectors or collection centers) shall be notified in due time.

Documents to be provided are as follows:

A. Collection areas description:

- Identification and/or codification of the collection areas
- Localization and details of landscape (mountains, plains,) and type of habitats (forest, fields, meadows ..).
- A chronological description of the collection area, i.e., detailing the specific use allocated to the land **or aquatic area** and the treatments for the past 3 years (an attestation by a reliable third party confirming the absence of treatment with non-allowed substances on the collection area will have to be provided).

Cross contamination risk factor: pesticides or other chemicals, hydrocarbons, heavy metal etc.

Plans: surface areas, detailed maps (scale 1:25 000 to 1:50 000) with definition of boundaries of the collection areas (pathway, road sides, hedges, villages), neighbouring sources of contamination (industries, motorway, conventional field crop, ...), buffer zones if applicable, sketches of the store houses, transformation facilities and collection centers. Where in the area, some parts are not eligible for certification (contamination, treatment, protected zone, ...), they shall be clearly indicated on the map.

B. Collected plants description

- Plant name (local, English, scientific name), plant end-use (medical, food, ...), harvesting dates and plant growth stage at the time of harvesting
- Details on protected varieties and potential ban or restrictions applicable in the collection area (CITES lists, red lists)
- Details on local and national rules on collection, official permit if applicable; name of local authority granting permission, if applicable

C. Preservation measures of the collected plants/sustainable collection management

- List of all plant parts being collected, of plant parts ensuring the recovery that should remain untouched (e.g. 20 to 30% of seeds/fruits)
- Measures taken to ensure long-term stability of the natural habitat during harvesting (e.g., rotation on collection areas), action plan to prevent destructive collection practices,
- Definition of the potential or the area and portion (%) of plants to be collected
- Other simultaneous harvesting operations for the same type of plant in the same location (overexploitation),
- Harvesting methods.

D. Collection organization: collectors' identification and traceability system

- Number of collectors for each area (only mention one harvest worker, when collecting as a family)
- Exhaustive list and potential codification of registered collectors per areas + training attestation.

The list shall be approved by Ecocert before the beginning of the collection campaign. Only listed people may supply organic plants (see model of list in Annex 1).

- List of potential intermediaries: Collection centers (with mention of the responsible person and of the concerned collectors/ center), store houses, processing units.
- Training of collectors on:
 - ✓ Compliance of the collection within the designated area
 - ✓ Sustainable collection techniques
 - ✓ Classification and recognition of plants
 - ✓ Organic production basics
 - ✓ Measures of identification and no mixing/non contamination by non-allowed inputs during collection, storage, transport or processing.

- **written commitment** from collectors (see model in Annex 2)

Each collector shall sign a contract with the operator responsible for the project in which he commits to :

- ✓ Collect only within the designated area
- ✓ Collect only the defined plants according to the sustainable collection methods for which he has been trained.
- ✓ Not outsource the collection by people not registered by the operator responsible for the project.
- ✓ Warn in case of detection of any source of contamination on the collection area
- ✓ Not handle the same products in conventional and organic quality
- ✓ Work exclusively with the operator responsible for the project for a given type of plants

Allow inspections and sampling by Ecocert and give access to the collection area, stores and processing facilities.

E. Documentary accounts

- **Purchase register** kept by the Collection center for each plant (see model in Annex 3): date of receipt, identification of the collector and the collection area, quantities, possible lot number
- Sales documentation (products, quantities, clients, labelling)

III. AUDIT OF LIVESTOCK OPERATIONS

- Identity and origin of organically managed animals
- Identification of edible and nonedible animal products produced on the operation
- Description of the total feed ration and amount of each type of feed fed for each type and class of animal (see § 205.237 (d))
- Document on changes made to rations throughout the year in response to seasonal grazing changes
- Description of the method for calculating Dry Matter Demand and Dry matter Intake
- Health care practices : date of treatment, details of the diagnosis, the posology, type of treatment product, veterinary prescription
- Description of livestock living conditions and historic of access to outdoor areas and pasture
- Pasture plan (see Guidelines TS 03 (NOP) “Livestock production”)

IV. AUDIT OF HANDLING

- Layout of the plant including storage facilities
- Organization chart
- Flow chart
- Description of the lot number system
- Detailed recipes including all ingredients and processing aids
- Analysis results (if done)
- Input documentation (purchase of ingredients incl. updated NOP certificate, processing aids, packaging materials, labels, etc.)
- Sales documentation (products, quantities, clients, labeling)

You will find all information about the NOP on the USDA-NOP homepage:

<http://www.ams.usda.gov/AMSV1.0/nop>

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

ACT FOR A SUSTAINABLE WORLD

ANNEX I

COLLECTORS LIST

Collection Area :

Collection Center :

Collection year :

Code	Name	Address	Nb of family members	Date of training

ANNEX 2

CONTRACT TEMPLATE

Important notice: *this is a standard contract to be used as a template. However, any other document drafted for contract purpose may also be used by the Project responsible to seal contractual agreements with collectors. In any case, the document should be duly signed by the collector.*

Contract

Between

..... (Collector)

And

..... (Responsible of the project: Collection center or Main operator)

The Collector hereby commits:

- To collect only within the designated area
- To collect only the defined plants according to the sustainable collection methods for which he has been trained.
- Not to outsource the collection by people not registered by the operator responsible for the project.
- To warn in case of detection of any source of contamination on the collection area
- Not to handle the same products in conventional and organic quality
- To work exclusively with the operator responsible for the project for a given type of plants
- To allow audits and sampling by Ecocert and give access to the collection area, stores and processing facilities.

The Responsible of the project commits:

To co-ordinate the organic collection of plants project

To co-ordinate the organic audits

To train the collector on sustainable collection techniques and provide the necessary elements (detailed maps of collection areas, list of defined plants).

Place :

Date :

Collector's name :

Signature :

For (Project responsible name)

Signature :

ANNEX 3

PURCHASE REGISTER

Collection center :

Plant :

Date of receipt	Collector/Code	Collection area	Quantity	Lot number

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