



2025 HANDER ORGANIC SYSTEM PLAN for BROKER/TRANSPORTERS

1. CERTIFICATION

205.100; 205.201(a)(3); 205.400

Date:

Customer ID:

Legal Business Name:

DBA:

Legal Business Name:

☐ Trust/non-profit

☐ Corporation

☐ LLC

☐ Legal

☐ Sole Proprietorship

☐ Cooperative

☐ Partnership

☐ Other

Primary Contact Name:

Phone:

e-mail:

Main site address (physical address):

Official mailing address:

Website address:

Are all facilities located at the same address (Including storage, cleaning, handling, etc.)?

☐ Yes

☐ No. Attach a list that includes all site addresses and include additional Site Registrations form ([OCP.F.39](#)) for each

Provide a detailed description of your operation:

Items Requested for Certification (Items to be listed on your 2025 certificate, [OCP.F.35](#))



Do you understand the organic certification requirements outlined in the National Organic Program Regulations, as they impact your operation? (ams.usda.gov/rules-regulations/organic)

☐ Yes

☐ No

Do you utilize the Organic Integrity Database? (<https://organic.ams.usda.gov/integrity/>)

☐ Yes

☐ No. *It is the applicant's responsibility to understand how to verify the organic status of suppliers and to understand many options exist when selecting a certification agency.*

Year first certified with any certifier:

Prior certifier(s) and products certified: *Applicants must disclose all organic certifiers they have worked with in the past or currently work with.*

Have you ever been denied organic certification or had your certification suspended or revoked?

☐ Yes

☐ No

Which category(ies) describes your business?

☐ Sell Products ☐ Trading ☐ Broker ☐ Importer ☐ Containerizing Products
☐ Exporter ☐ Combining Products ☐ Transporting ☐ Labeling Products
☐ Storing Products ☐ Receiving Products ☐ Loading Products

Are you an exempt operation according to 205.101? Describe which exemption applies:



2. FRAUD PREVENTION PLAN

205.103(b)(2); 205.201(a)(3)

NOP requires all certified operations have an Organic Fraud Prevention Plan. This plan should aim to describe:

A. Vulnerability Assessment	<i>Self- assessment that evaluates and identifies weaknesses in a system. Ex: product being misrepresented on a certificate, uncertified suppliers.</i>
B. Mitigation Measures	<i>Help to anticipate potential risks and develop strategies for prevention and mitigation. Ex: only order from reputable or certified suppliers.</i>
C. Monitoring/ Continuous Improvement	<i>Verification of the effectiveness of the plan. How often is the plan reviewed? How have you determined your plan is adequate? How do you train employees?</i>
D. Incident Response/Reporting	<i>Reporting system may include creating a process to document problems. Have a system in place to preserve evidence. What is the process of reporting suspected fraud to ODA and NOP?</i>

Each Fraud Prevention Plan must be designed to meet your operation's distinctive activities, scope of operation, and complexity. Plans will look different based on each operation's individual needs. Acceptable plans will be made on your current OSP (below), using form OCP.F.40, or attaching a completed plan. A Supply Chain map or chart is needed to complete your plan.

☐ I will be using this OSP form.

☐ I will attach a copy to this OSP.

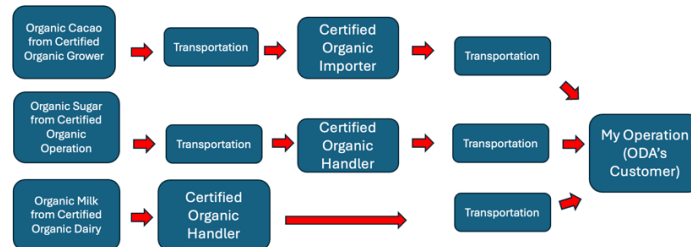
List the person(s) responsible for creating, maintaining, implementing, and monitoring your operations Fraud Prevention Plan:

Name	Operation Role



Describe/Map your Supply Chain: *Identify all incoming organic items. Option to list, draw or provide a flow chart. Items can be grouped into categories rather than mapping each item.*

Example:



Vulnerability assessment and mitigation measures: *(Assess where your operations weak points, where it is possible for fraud to occur?)*

Describe how you will be monitoring and making continuous improvement to your Fraud Prevention Plan:

Describe your incident response/reporting plan for your Fraud Prevention Plan:

How do you monitor the organic status of your suppliers? *(Be specific, include organic certificates).*

How are organic products received?

☐ Bins ☐ Totes ☐ Boxes ☐ Pails ☐ Retail Packages ☐ Drums ☐ Bulk ☐ Other

Please describe how incoming organic products are protected from contamination and commingling with non-organic products: *(Applicable only to parallel production and bulk plant materials).*



Are products labeled by your company? All labels must be submitted and approved by ODA prior to use.

☐

No

☐

Yes

If products are stored or shipped in a bulk, nonretail container, a bulk label is required.

Label must identify what the product is, that it is organic and include a lot number or other information connecting the product to audit trail documentation.

3. GENERAL INFORMATION

205.201; 205.401

Do you subcontract any activities to other operations while the product is still owned by your operation?

☐

No

☐

Yes. Describe below:

Subcontractor Name	Address	Phone Number	Subcontracted Activity	Organic Certifier

Attach additional sheets as necessary.

Do you handle both organic and conventional products?

If yes, which products?

4. SUPPLIERS:

205.103(b)(2); 205.201(a)(3)(6)

How do you monitor the organic status of your customers?

How does your company receive organic products (loose/baled hay, packaged products, company does not physically receive products, etc.)?



4. EQUIPMENT/CLEANING

205.105; 205.103; 205.272

What cleaning methods are used?

☐ Purging ☐ Compressed Air ☐ Scraping ☐ Sanitizing ☐ Sweeping
☐ Vacuuming ☐ Steam Cleaning ☐ None ☐ Other

Equipment: List equipment used for in your operation:

Equipment	Used in both organic and conventional?	Is it cleaned prior to use in organic?	Is cleaning documented?

Attach additional sheets as necessary.

List cleaning of equipment and products:

<u>Area</u>	<u>Cleaning Type</u>	<u>Cleaned Prior to Organic Production?</u>	<u>Cleaning Products Used</u>	<u>Frequency</u>	<u>Is Cleaning Documented?</u>
Receiving					
Storage					
Transfer					
Production					
Packaging					
Loading Dock					
Building Exterior					
Accidental Spills					
Other					



5. STORAGE

205.270; 205.272; 205.307

How do you ensure organic products are not contaminated or comingled with non-organic products during storage? (Fill out table below)

<u>Use</u>	<u>Location</u>	<u>Type/Capacity</u>	<u>ID Name/Number</u>	<u>Dedicated Organic?</u>	<u>Potential Contamination Issues?</u>
<u>Product Storage</u>					
<u>Packaging Materials</u>					
<u>In-process Storage</u>					
<u>Off-site Storage</u>					

6. SHIPPING/TRANSPORTATION

205.270; 205.272; 205.307

What type of packaging are products packaged, stored, and shipped in?

☐ Paper ☐ Glass ☐ Aseptic ☐ Cardboard ☐ Metal ☐ Wood ☐ Plastic
☐ Wax Paper ☐ Foils ☐ Bulk ☐ Natural Fiber ☐ Other

Are all packaging and shipping materials food grade?

☐ No
☐ Yes

How do you ensure outgoing transport units are clean prior to loading?

☐ N/A ☐ Clean-out Records ☐ Clean Truck Affidavit ☐ Other

How do you ensure any packaging, storage, or shipping containers have not been exposed to synthetic fungicides, preservatives, or fumigants?



Please indicate what shipping or sales documents are maintained:

- ☐ Pallett/Tote Ticket ☐ Contracts ☐ COA's ☐ Bills of Lading ☐ Invoice
☐ Scale Tickets ☐ Clean Truck Affidavit ☐ Other

Are packaging or shipping materials reused?

- ☐ No
☐ Yes. *Describe how organic product is protected from contamination:*

How do you identify products as organic (needs to be on all documents):

Are organic products shipped in the same transport units as non-organic products?

- ☐ No
☐ Yes. *How are organic products segregated:*
☐ Separate Pallet ☐ Sealed, Impermeable Containers ☐ Other

Does your company arrange outgoing transportation?

- ☐ No
☐ Yes

7. IMPORT/EXPORT

205.201(a)(6); 205.273

Do you export products?

- ☐ No
☐ Yes. *Fill out the below:*

List products planned for export:

What countries are products exported to?

At what point do you no longer own the product? And list all companies in the supply chain between ownership and export:



Explain how you verify exported products comply with the country of destination's organic regulations:

8. QA AND RECORDKEEPING

205.103

Do you have standard operating procedures for your organic processing/handling?

☐

No

☐

Yes. *Please attach.*

Do you have a recall system in place?

☐

No

☐

Yes

Does your company conduct internal audits?

☐

No

☐

Yes

Indicate all types of records kept:

☐

Purchase Orders

☐

Contracts

☐

Bills of Lading

☐

Customs Forms

☐

Invoices

☐

Receipts

☐

Transaction Certs

☐

Receiving Logs

☐

Production Reports

☐

Equipment Clean Out Records

☐

Packaging Reports

☐

QA Reports

☐

Supplier Organic Certs

☐

Sales Orders

☐

Phytosanitary Certs

☐

Other:

What records are maintained to track the volume of organic products handled by your operations?

Records must track organic integrity from sale of organic final product to invoices of incoming organic product (e.g.: Sale of final product back to harvest, planting, and purchase of planting stock). Please describe how your recordkeeping system meets these requirements.



The NOP requires records related to an organic product be maintained for five years.
Please describe your system for maintaining records related to organic products.

Name	Title	Date
<i>I affirm that all statements made in this Organic System Plan are true and correct to the best of my knowledge.</i>		

NOTE: When there are changes to your operation, you must supply an updated OSP (this form) to ODA. Submitting this OSP does NOT complete your application. You must include:

- OCP.F.04 Application and fee for Organic Certification 2025
- OCP.F.09-25b Input Inventory and Review - Handler 2025
- OCP.F.35 Handler Products for Certification
- Any labels, product formulations, and site registrations, if applicable.

All materials can be found at: [ODA's Organic Program website](#).