



2025 HANDER ORGANIC SYSTEM PLAN

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:

Organic Certification 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:

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

Product Name	100% Organic, Organic or Made with Organic	Product Formulation Submitted?	Label Submitted?	Projected Production Amount



Do you handle (an) organic product(s) that can be certified organic in the year you are applying for certification

☐ Yes

☐ No. ODA may review your application as a transitional operation (transitional has the same fee schedule and review requirements, but an organic certificate is not issued). Documentation still must be kept for traceback and mass balance exercises during an inspection.

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 ☐ Process Products ☐ Package Products ☐ Trading ☐ Brokering ☐ Importer
☐ Exporter ☐ Combining Products ☐ Culling Products ☐ Repacking Products ☐ Labeling Products
☐ Storing Products ☐ Receiving Products ☐ Loading Products ☐ Conditioning Products
☐ Containerizing Products ☐ Aggregating Products

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

Is your business in physical contact with organic products?

☐ Yes

☐ No. Explain:

If your business is not in physical contact with organic products, please use the Transporters/Brokers Organic System Plan (OCP.F.41)



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.

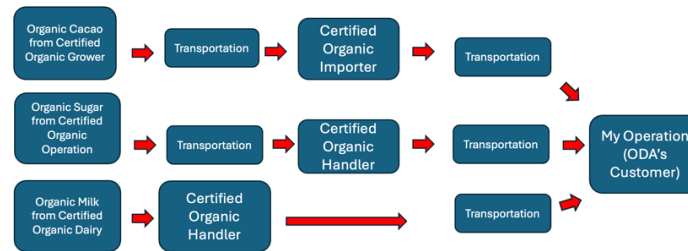
- ☐ I will be using this OSP form.
☐ I will use Form OCP.F.40.
☐ I will attach a completed plan.

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 do you source and monitor the status of incoming organic materials?



How do you prevent the use of ingredients produced using excluded methods (genetic engineering, sewage sludge, and ionizing radiation)?

- | | |
|---|-------------------------------------|
| <input type="checkbox"/> Certified Organic Ingredients Only | <input type="checkbox"/> GE Testing |
| <input type="checkbox"/> Letters from Manufacturers | <input type="checkbox"/> Other |

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).

Please check all that apply to your operation:

- ☐ On-site Storage ☐ Packing House ☐ Repacking of Products ☐ Off-site Storage ☐ Retail Sales ☐ Bulk Sales
☐ Processing Facility ☐ Distributor ☐ Import ☐ Exporting ☐ Seed Cleaning ☐ Brokering/Trading ☐ Retail Labeling
☐ Non-retail Labeling ☐ Private Labeling ☐ Parallel Production (organic/non-organic) ☐ Freezing ☐ Baking ☐ Canning
☐ Individual Quick Freezing ☐ Multi-ingredient Product Production ☐ Labeling of Non-packaged Products
☐ Purchase/Production of Products Produced Using Hydro/Aero/Aquaponics

How do you source organic ingredients?

Is an internal lot code assigned to organic ingredients?

- ☐ No
☐ Yes. Describe your lot code system:

Are products labeled? 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 of the following out to other operations while the product is still owned by your operation?

☐ No

☐ Yes. Describe below:

☐ Processing

☐ Cleaning

☐ Packing

☐ Storage

☐ Transportation

☐ Distribution

☐ Other

Is exposed, unpackaged, bulk, or loose organic product handled by these subcontractors?

☐ No

☐ Yes. How do you prevent contamination/comingling?

Subcontractor Name	Address	Phone Number	Subcontracted Activity	Organic Certifier

Attach additional sheets as necessary.

4. EQUIPMENT/CLEANING

205.105; 205.103; 205.272

What cleaning methods are used?

☐ Purging

☐ Compressed Air

☐ Scraping

☐ Sanitizing

☐ CIP

☐ 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.

Is the use of cleansers followed by a potable rinse or other intervening step?

☐ No

☐ Yes

Are any products containing quaternary ammonia used?

☐ No

☐ Yes

Does your facility test for residues?

☐ No

☐ Yes



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. Production

205.201(a)(6)

What type of production records are maintained?

- ☐ Ingredient Usage Report ☐ Shrinkage Log ☐ Waste Log ☐ Product Spec Sheet ☐ Label Use
☐ Ingredient Inventory ☐ Production Log ☐ QC Reports ☐ Finished Inventory ☐ Batch Recipes
☐ Ingredient Inspection Report ☐ Packaging Reports ☐ Other

How are products identified as organic on production documents?

Are packaging/processing lines dedicated to organic?

- ☐ Yes
☐ No. Describe how you prevent contamination/comingling with non-organic product:

How are partial pallets/boxes/drums of organic products handled and how do you ensure they are protected from comingling with non-organic products during packaging or processing?

What type of post-harvest materials are used at your facility?

- ☐ None ☐ Anti-microbials ☐ Anti-foaming Agents ☐ Sanitizers ☐ Waxes ☐ Floatation Agents
☐ Anti-fungal Agents ☐ Sprout Inhibitors ☐ Other:

What type of processing aids are used at your facility?

- ☐ None ☐ Enzymes ☐ Anti-stick Agents ☐ Anti-caking Agents ☐ Filtering Agents ☐ Other



6. WATER

205.103; 205.200; 205.272; 205.601; 205.605

How is water used at your operation?

☐ None ☐ Product Transportation ☐ Cleaning ☐ Cooking ☐ Cooling ☐ Ingredient ☐ Other

Indicate all water sources at your operation:

☐ None ☐ On Site Wells ☐ Municipal/County ☐ River/Creek/Pond
☐ Irrigation District ☐ Spring ☐ Other

How and at what frequency is the water quality monitored?

Does the water quality meet the Safe Drinking Water Act Standards?

☐ No
☐ Yes. *How is this monitored?*

Is water treated on-site?

☐ No
☐ Yes

Is chlorine, calcium hypochlorite, chlorine dioxide, or sodium hypochlorite used?

☐ No
☐ Yes

If chlorine products are used, how and where is water tested to ensure chlorine levels in contact with the product or product contact surfaces are at or below 4 ppm?

Is steam used in processing or packaging of food products?

☐ No
☐ Yes. *Complete below:*

☐ **Does steam have direct contact with organic foods?**

☐ No

☐ Yes. *Do you use:*

☐ Testing of Condensate ☐ Steam Filters ☐ Condensate Traps
☐ Testing of Finished Product ☐ Other:

Are boiler additives used?

☐ No
☐ Yes. *Does the steam contact the product?*



7. 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>Ingredient Storage</u>					
<u>Packaging Materials</u>					
<u>In-process Storage</u>					
<u>Finished Product Storage</u>					
<u>Off-site Storage</u>					

8. PEST CONTROL

205.271

Who is responsible for pest control *(Name and contact information):*

Does your operation have written pest control management procedures?

☐ No

☐ Yes. *Attach procedures.*

What pest control problems do you have at your facility?

Are records of pest monitoring kept?

☐ No

☐ Yes

Are records of all pesticide applications kept?

☐ No

☐ Yes

Check all pest management practices used:

☐ Good Sanitation ☐ Screened Windows/Vents ☐ Diatomaceous Earth* ☐ Boric Acid*

☐ Fogging* ☐ Crack and Spray* ☐ Tin Cats ☐ Vitamin Baits* ☐ Fumigation* ☐ Carbon Dioxide*

☐ Repair Cracks/Holes ☐ Sealed Doors/Windows ☐ Air Curtains ☐ Clean Up Spoiled Product

☐ Remove Exterior Habitat ☐ Incoming Ingredient Inspection ☐ Physical Barriers ☐ Sticky Traps

☐ Temperature Treatments ☐ Ultrasound/light Devices ☐ Electronics ☐ Pheromone Traps*



**The use frequency and method of application of these materials must be included on the Input Inventory ([OCP.F.09-25b](#)) and be given prior approval by the ODA. The Input Inventory must be updated and submitted prior to the use of new materials.*

Application of pest control materials first requires implementing physical means of pest prevention and elimination. If pest control materials are utilized, please explain how preventative measures and physical controls are insufficient.

If materials are used, please explain preventative measures to prevent contact with organic equipment, products, ingredients, and packaging.

9. Biodiversity

205.201(a)(6)

☐ NA

If lands around the facility are certified organic:

What practices are used to support biodiversity?

☐ Vegetated Swales ☐ Rain Gardens ☐ Vegetated Filter Strips ☐ Other:

What practices are used to prevent erosion?

☐ Native Landscaping ☐ Vegetative Cover ☐ Mulch ☐ Other:

10. 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

11. IMPORT/EXPORT

205.201(a)(6); 205.273

Do you import organic ingredients?

☐ No

☐ Yes. Complete the following and attach your import certificate from [Organic Integrity Database](#).

List imported ingredients:

Are products directly imported, or imported through a broker/distributor?

What countries are organic ingredients imported from?

What type of labels are used to identify imported products (retail, bulk, etc.) and is an organic seal from the country of import present on bulk and/or retail labels?

How do you verify product has not been fumigated, irradiated, or treated with other prohibited substances upon entry into the United States?

At what point do you legally own the product? And list all companies in the supply chain between import and ownership:

How do you verify imported products comply with the USDA organic regulations and how often is verification performed?



Do you export products?

☐ No

☐ Yes. *Fill out the below:*

List products planned for export:

What form/packaging are products exported?

What countries are products exported to?

Does bulk packaged product display the statement “Organic product, do not fumigate or treat with irradiation”?

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:

12. QA AND RECORDKEEPING

205.103

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

☐ No

☐ Yes. *Please attach.*

Do you have a Quality Assurance program in place?

☐ No

☐ Yes. *What type:*

☐ ISO ☐ HCAAP ☐ Total Quality Management ☐ Other:

Are outside quality assessment services used?

☐ GlobalGAP ☐ PrimusGFS ☐ SQF ☐ BRC ☐ USDA GAP/GHP

☐ USDA HGAP/HGAP Plus+ ☐ Other

Does your company conduct product testing?

☐ No

☐ Yes. *What type of tests?*

Are ingredient samples retained?

☐ No

☐ Yes



Are finished product samples retained?

☐ No

☐ Yes

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 ☐ Test Results ☐ Transaction Certs ☐ Receiving Logs

☐ Production Reports ☐ Equipment Clean Out Records ☐ Blending Report

☐ Packaging Reports ☐ QA Reports ☐ Supplier Organic Certs

☐ Complaint Log ☐ Sales Orders ☐ Phytosanitary Certs ☐ Other:

Supplier Ingredient Verification for:

☐ Non-GMO

☐ No sewage sludge

☐ No ionizing radiation

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). Organic ingredients must be verified as certified organic. Please describe how your recordkeeping system meets these requirements.

Amounts of organic ingredients in finished products must balance with certified organic ingredients purchased. 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](#).