

Record-Keeping for Organic Certification Applicants

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If you're new to organic certification, the record-keeping requirements can feel daunting. This article intends to outline why record-keeping is emphasized in the organic certification process and how you, as an applicant, can meet the requirements and maintain certification. Specific attention will be given to the records needed to complete mass balances and audit trail exercises at the initial onsite inspection for applicants.

Why do I need to keep records?

In short, it's a requirement outlined in the Organic Food Production Act (OFPA), as well as in NOP §205.103, which states, in full:

§ 205.103 Recordkeeping by certified operations.

(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."

(b) Such records must:

- (1) Be adapted to the particular business that the certified operation is conducting;
- (2) Fully disclose all activities and transactions of the certified operation, in sufficient detail as to be readily understood and audited; records must span the time of purchase or acquisition, through production, to sale or transport and be traceable back to the last certified operation;
- (3) Include audit trail documentation for agricultural products handled or produced by the certified operation and identify agricultural products on these records as "100% organic," "organic," or "made with organic (specified ingredients or food group(s))" or similar terms, as applicable;
- (4) Be maintained for not less than 5 years beyond their creation; and
- (5) Be sufficient to demonstrate compliance with the Act and the regulations in this part.

(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.

The longer answer, with more context, is that organic certification, more than anything else, is a process that we at MCS need to monitor at every step along the way for all producers who choose to enter the certification program. Whether your motivations to certify as an organic producer are market-driven, philosophical or a combination of the two, the USDA's focus on the process ensures that the practices used by any operation will allow entry into the organic market for their products and maintain consumer confidence.

Much of what is referred to as the "integrity" of the process pivots on record-keeping. Since an inspector will only typically visit you once or twice a year, MCS' monitoring ability is obviously limited and, therefore, relies on producer records that our inspectors and staff can review to address any questions or concerns that may come up during the annual certification process. We review records to verify that producers are doing what they claim to be doing in the annually submitted Organic System Plan (OSP). This means that records related to all production practices, sanitary procedures, pest control and marketing need to be maintained and made available to the inspector during the annual onsite visit or to any member of MCS staff who might request records from you.

Ok. So how do I keep all these records?

This is a trickier question. You can see above that NOP §205.103 leaves a lot open to interpretation. Records must "fully disclose ... in sufficient detail ... to demonstrate compliance ..." etc. What do the words "fully," "sufficient" and "demonstrate" actually mean? What does it mean to have "readily understood and audited" records?

We wrestle with these types of questions

every day in our role as a USDA-accredited organic certifier and, to make our lives — as well as yours — easier, we have created and compiled a set of record-keeping templates on the MCS website at the following address: mofgacertification.org/record-keeping-for-organic-producers. We intend to add more templates to our website for other applicable scopes and scenarios.

If you're feeling lost as an applicant trying to keep records, print these off to get started and modify them as you see fit to adapt them to the "particular business" you are engaged in as a certified producer.

Additionally, MOFGA has an entire department called farmer programs intended to help producers meet the requirements of certification, among other things. Contact farmer programs if you need help with your records and a staff member will work with you to figure out the best approach to complying with NOP §205.103.

Great, but what's this I've heard about a mass balance and audit trail? They sound stressful.

Yes, the stress is real, but they are, after all, designed as "stress tests" on your record-keeping system. Inspectors are required to perform each exercise annually at the onsite inspection for specific reasons. First, the audit trail/trace back audit is intended to track a randomly selected product from "seed to sale" or from "sale to seed." This exercise should demonstrate that products are listed as "organic" throughout the record-keeping system, so as to distinguish them from any non-certified or conventional production occurring, as well as to help the inspector identify any "control points" in your production process that are (or are not) being addressed through your practices, sanitary or otherwise.

Secondly, the mass balance is designed to mitigate fraud throughout the organic supply chain by auditing production and sales for a single product category over a specific period of time. This exercise is