*This OSP is to be completed for operations requesting organic certification without a physical facility.*

Choose one:

First time applicant.

This is an **update** of an Organic System Plan already submitted to Primus Auditing Ops.

SECTION 1: General Information

(NOP Rule 205.201 and 205.401)

**1a. Organization Name:**

**1b. dba Name (if applicable):**

**1c. Address:**

**1d. City:**

**1e. State:**

**1f. Zip code**:

**1g. Country**:

**1h. Billing information:**  Same as Physical address

**Address:**

**City:**

**State:**

**Zip code**:

**Country:**

**1i. Legal Representative:**

**Name:**

**Email:**

**Phone:**

**1j. Authorized Contacts:**

**Name:**

**Email:**

**Phone:**

**Name:**

**Email:**

**Phone:**

**Name:**

**Email:**

**Phone:**

**1k. Organization Legal status:** Choose an item.

**If other, specify:**

**1l. Do you obtain a State registration?**  Yes  No

**If yes, List state registration # (if applicable):**

*Attach a copy of your current State certificate.*

**1m. Do you have a copy of current NOP organic standards?**  Yes  No

**1n. Write a description of your operation’s activities:**

**1o. Months of Production**:

**1p. Business hours:**

**1q. Inspection language preference:**

**1r. What language is your documentation?**

**1t. What does your operation produce or handle:**

Choose an item.

**1u. Give clear driving directions to the operation requested for organic certification for the inspector, or confirm the GPS will get you to the operation location:**

**When are you available to contact?**

Choose an item.

**When are you available for inspection?**

Choose an item.

**1v. Does your operation’s projected gross agricultural income from organic sales total $5,000 or less annually?**

Yes  No

**If yes**, do you intend to sell your products to anyone that will resell them as “organic” or use as an ingredient in an “organic” product?

Yes  No

**1w. Is this a renewal? If so, has anything changed within your Operation System Plan since your last certification**?

Yes  No

**If yes**, summarize the changes:

**1x. Have you conducted an organic self-audit?**

Yes  No

**If yes,** indicate the date:

SECTION 2: Prior Organic Certification and/or Noncompliance

(NOP Rule 205.405 (e))

This section is not applicable to my operation

(For first time applicants only. Renewing applicants may skip this section)

**2a. Has this organization ever been denied certification, suspended or revoked?**

Yes  No

**If yes**, list the certifier name and provide all documentation:

**2b. Is this organization currently certified organic with another agency?**

Yes  No

**If yes**, attached a copy of your current organic certificate

**2c. For first time auditees, has this organization ever been certified organic?**

Yes  No  N/A

If yes, attach a copy of your previous organic certificate.

**2d. List all non-compliances from your last certification and state how the non-compliances have been addressed.**

N/A  Non-Compliances:

*Attach documentation that verified non-compliances have been addressed.*

SECTION 3: International Markets

This section is not applicable to my operation

(§205.201, §205.273, 205.300 (b) (c))

3a. **Select all that applies:**

Import Directly

Import Indirectly

Export Directly

Export Indirectly

*If any of these options are applicable, you must request and complete the International Markets OSP Addendum.*

SECTION 4: Operation Information

(NOP Rule 205.201 and 205.401)

**4a. Do you manage other office sites other than the address in Section 1?**  No  Yes

If yes, complete the following for ALL locations managed by the Organization (non-organic & organic sites):

|  |  |  |  |
| --- | --- | --- | --- |
| **Site/ID Name** | **Site Address:**  **City, State, Zip** | **Contact Name and Phone Number** | **Description of Site activities and responsibilities:** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

**4b. Operation Flow Diagram Attached:**  Yes  No

*\* Provide a schematic or written description of the process flow from receiving records through to product shipping records.*

**4c. Projected percentage of total production of organic and non-organic products:**

% Non-organic:

% Organic:

*If non-organic product is handled, submit a list of the non-organic product handled at this operation.*

**4d. Does your operation have any certifications besides Organic?**  Yes  No

**If yes**, list auditing company and scheme(s):

SECTION 5: Products – To Be Listed on Certificate by ID Mark & Market

(NOP Rule 205.201(a) & 205.300)

## Type of Marketing

## 5a. Select all that apply:

## Farmers market direct to retail CSA/subscription service wholesale on-farm retail

Bulk commodities to processor  contract to buyer  other:

**5b. Complete a Master Supply Chain and Product List to include all products/ingredients and suppliers. Is this document attached?**

Yes  No

**5c. Do you require your organic certificate to list all ID Marks?**

Yes  No

**If yes,** ensure they are all listed in the second column in 5d.

\*If product is received packaged and no re-packing or re-purposing is conducted, the phrase “as previously packed by certified supplier” may be used in the ID Mark column\*

**5d. Complete the table below.**

***Add more rows if needed by hovering over the bottom left corner of the last row and clicking on the plus symbol. Copy and paste the fillable fields.***

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Product**  **Requested for Certification** | **ID Mark**  **(Labels)** | **Specify Label Type:**  **Select all that apply.** | **Organic**  **or**  **100% Organic?** | **International Market?**  **Specify Equivalency Request:** |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |
|  |  | Retail  Non-Retail  Private Label |  |  |

***Complete a Master Supply Chain and Product List to include all products/ingredients and suppliers.***

***Complete a Private Label Agreement for each ID Mark that you do not own.***

***Complete an International Market Addendum for any additional market request.***

***Complete a Formulation Sheet for any multi-ingredient products.***

SECTION 6: Biodiversity & Natural Resources

(NOP Rule 205.200 & 205.270)

**6a. Describe your biodiversity program:**

**6b. Describe the natural resources within and/or surrounding your operation:** (Including those that may extend beyond your property boundaries, yet which impact/are impacted by your trader operation)

**Waste Management**

**6c. Describe any practices in place used for waste management:**

**6d. Do you recycle waste materials?**  Yes  No

Describe:

**Energy Conservation & Air Quality**

**6e. Describe any practices in place used for energy conservation (i.e. solar, wind):**

**6f. Describe any practices in place used for air quality management:**

**Water Use:**

This section is not applicable to my operation

**6c. What is your water source?** (i.e., on-site well, river, pond, municipal, county, etc.)

**6d. Attach a copy of the water analysis verifying portability if water is from a non-municipal source. Is the document attached?**  Yes  No

Name of document:

**6e. Describe any practices in place used to conserve water:**

**6f. In what capacity is water used? (i.e., cleaning and sanitation, cooking, cooling, transport, processing, etc.)**

SECTION 7: Maintenance of Organic Integrity

(NOP Rule 205.270, 205.272, 205.300, 205.101(b) and 205.605)

**Storage & Shipping**

This section is not applicable to my operation

**7a. Describe the operations being utilized for storage:**

\*Must complete the Master Supply Chain and Product list document.

**7b. Is your organization responsible for the transportation of the organic product?**

Yes  No

**If yes,** please list the company:

\*Be aware some transportation companies are required to be certified organic.

**7c. In what form are organic products received?**

(ie, field bins or boxes, bulk tankers, totes, drums, bags, boxes, etc)

**7d. In what form are finished products shipped?**

*(for example: tote bags, cardboard drums, plastic crates, etc)*

**Quality Testing**

This section is not applicable to my operation

7e. Are products ingredients sampled for quality or testing?  Yes  No

If yes, are sampling tools dedicated for organic use only?  Yes  No

**If no,** describe how sampling equipment is cleaned prior to organic sampling and or attach your procedure:

**Packaging**

This section is not applicable to my operation

**7f. What type of packaging material is used?**

*(for example: cardboard, wood, glass, metal, plastic, etc)*

**7g. Is packaging documented to be free of any packaging materials, storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant?**  Yes  No

**If no,** explain*:*

*If yes, attach documented evidence.*

**7h. What type of packaging is used?** (ie, aseptic, cardboard, glass, metal, synthetic fiber, paper, plastic, etc)

**7i. Is all packaging food grade?**  Yes  No

**7j. Are packaging materials and/or containers ever re-used?** (i.e. totes, bins, cardboard cartons)

Yes  No  N/A

**If yes,** indicate what the previous use was:

**If packaging materials are re-used, describe the cleaning procedure performed prior to reuse:**

SECTION 8: Record-Keeping System

(NOP Rule 205.103 & 205.400)

**Traceback/Supply Chain**

**8a. Describe how records track products back to the receiving or acquiring date through the sale or transport, and allow the traceability back to the last certified operation (or list the name of attached procedure):**

**8b. How do you ensure the production lot number, shipping identification, or other unique information that links the container/product to the audit trail documentation is included in the records you maintain?**

**8c. Do traceability records identify the organic product with its applicable claim (i.e. 100% organic, organic, made with organic, etc.)?**

Yes  No

**If no,** explain how you identify the organic with non-organic product:

**Records**

**8d. Which records do you keep for organic production?** (You may submit a supporting document with a list, specify name of that document here)

**8e. Are all records that verify organic compliance maintained for a minimum of 5-years beyond creation?**

Yes  No

**8f. Which records do you keep for non-organic production?**

Not applicable, organic only  Same as the records listed in 8d

Other:

**8g. Describe the monitoring practices and procedures to be performed by your organization, identified in this Organic System Plan and operation practices.**

**8h. How are these monitoring practices and procedures effectively implemented and how frequently are they performed?**

**Organic Fraud Prevention**

**8i. Describe your organic fraud prevention program.**

**8j. List the documents you maintain for your organic fraud prevention program and submit them.**

**8k. How do you monitor the effectiveness of the organic fraud prevention program?**

SECTION 9: Trace back and Mass Balance

(NOP Rule 205.103 & 205.400(g)(8)(9))

During the on-site inspection, inspectors are expected to conduct thorough trace-back audits and mass balance audits to verify traceability and record-keeping requirements (§205.103). Please make sure to have the documentation available needed to complete a mass balance and trace back during the onsite audit. Please note that the inspector will pick a product to conduct a traceback and choose the time frame to conduct a mass balance (may range from 1 month- 1 year).

## What is a trace back?

## A trace back is a trail of documentation that can be used to trace the origin of product and material inputs. The system should also show that it can trace forward and indicate which customer(s) received the product. This is usually accomplished by lot coding materials throughout a process and recording these lot codes at different points in the process.

**What is a mass balance?**

A mass balance is defined as a reconciliation of the volume of incoming raw material against the amount used in the resulting finished products, taking into account process waste and rework. The purpose is to verify that the organic inputs purchased and used by the operation are sufficient in quantity to produce the organic products that were sold.

Each operation’s record system keeping is distinctive, however example of documents that can be used to complete a mass balance are:

* Ingredients receiving records and purchase invoices
* Inventory records for raw and finished goods
* Harvest logs
* Sales and shipping records for finished goods

**References**: NOP Guidance 2602 Instruction Recordkeeping: <https://www.ams.usda.gov/sites/default/files/media/2602.pdf>

SECTION 10: Affirmation

(NOP Rule 205.406 & 205.403(b))

# **I affirm that all statements made in this application are true and correct. No prohibited products have been applied to any of my organically managed fields during the three-year period prior to projected harvest. I understand that the operation may be subject to unannounced inspection and/or sampling for residues at any time as deemed appropriate to ensure compliance with the Organic Foods Production Act of 1990 and National Organic Program Rules and Regulations. I understand that acceptance of this questionnaire in no way implies granting of certification by the certifying agent. I agree to provide further information as required by the certifying agent.**

**In submitting this signed application, the above named organization is declaring its commitment to compliance with the principle requirements of the USDA National Organic Program. This declaration also includes the commitment to pay all fees imposed by the NOP Program and the fees and expenses incurred by Primus Auditing Operations as the Certifying Agent in the performance of the inspection and certification activities. This includes paying the non-refundable registration fee, as disclosed in the Fee Schedule.**

**I affirm that I am aware of unannounced inspection, in which I am aware that they may be additional inspections based on random selection, high risk(s), complaints, and/or investigations.**

**I affirm that I am aware that supply chain audits may be conducted due to the organic certifiers’ established risk-based criteria.**

**I affirm to taking full responsibility of compliance that all operators involved in my supply chain, including exempt operations and I have completed the Master Supply Chain and Product List.**

**\*electronic signature is accepted\***

Name of Person completing this OSP:

Signature of Authorized Person:

Date: