



OSP GUIDELINE FOR HANDLING/TRADER OPERATIONS

At the top right hand corner of each section on the OSP, you will find in reference to the NOP rule. Please use this as a guidance if you have any questions pertaining to each sections requirements.

Choose one:	First time applicant This is an update of an Organic System Plan already submitted to Primus Auditing Ops.	Mark the box if your applying for the first time with Primus Auditing Ops Mark the box if this is your annual re-certification request.
Section 1: General Information (\$205.201 & \$205.401)		
Question#	Question	Expectation
1a	Organization Name:	The name of your operation that you are requesting to be listed on your organic certificate, which must match the name that is listed on your business license. As noted in NOP policy memo 2603, only one operation per organic certificate. Each certified operation must have its own organic certificate.
1b	dba Name (if applicable):	The dba of your operation if applicable. This would be listed on your organic certificate to accompany your operation name. If not applicable, you may indicate "N/A".
1c-1g	Address:	The address that will be listed on your organic certificate and is the address where the physical inspection will take place.
1h	Billing information:	The billing address for your operation, if different from physical address. If same as physical address, please check the box.
1i	Legal Representative:	The legal owner of the operation and may be different from the representative completing the organic certification paperwork.
1j	Authorized Contacts:	The best contact(s) for the organic certification matters, including scheduling of the organic audit, filling out the OSP, and responding to information requested by PAO. All contacts listed on this section will be copied in any correspondence involving certification.
1k	Organization Legal Status:	The status of your operation such as LLC, Inc., etc. If your classification is not listed under the boxes available, please mark other and specify.
1l	Do you obtain a State registration?	Certain states require an organic registration in addition to certification. All California certified organic operations are required to obtain a food establishment registration with CDFA or CDPH. If yes , list state registration # and attach a copy of your current State certificate. If not required to obtain organic registration, please submit proof of a business license. California operators may refer to the CDFA Commodity Code List & CDPH Commodity Code List below to determine which requirement fits your operation: http://www.cdfa.ca.gov/is/docs/New_and_Amend_Organic_Registration.pdf http://www.cdph.ca.gov/pubs/forms/forms/CFRdForms/cdph8593.pdf
1m	Do you have a copy of current NOP organic standards?	Please ensure that you are familiar with the organic standards, and obtain a copy for your records. The link below will take you to the current electronic code of Federal Regulations, part 5 National Organic Program (NOP). https://www.ecfr.gov/current/title-7/part-205 https://www.ecfr.gov/current/title-7/part-205
1n	Write a description of your operation's activities:	Describe a comprehensive overview of the day-to-day functioning of your business or organization. This description should encompass various aspects such as the nature of your products or services, key processes involved, target audience or clientele, organizational structure, distribution channels, technological infrastructure, and any other pertinent details that contribute to the operation's overall functionality
1o	Months of Production:	The months that your operation is in production and/or handling, selling.
1p	Business hours:	The contact hours that your operation is available for organic inspection. Please also indicate here, if applicable, the specific hours or days that organic product is handled or packed.
1q	Inspection language preference:	The language that you prefer the auditor to conduct your organic inspection in.
1r	What language is your documentation?	The language pertaining to your operation paperwork that will be sent to PAO to accompany the organic system plan.
1s	What does your operation produce or handle:	The status of your handling operation and indicate whether or not you are you a parallel/split operation, handling both conventional and organic product, or a dedicated organic facility.
1t	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:	Any specific driving directions for the inspector to find your exact meeting location, and if none, confirm that GPS will advise clearly. Additionally, indicate which portions of the day you are available for contact and inspection.
	When are you available to contact:	Hours of availability or business hours.
	When are you available for inspection:	Availability of specific days of the week and times.
1u	Does your operation's projected gross agricultural income from organic sales total \$5,000 or less annually?	Indicate whether or not your operations organic sales alone fall below \$5,000 per year, and if "yes" will you sell the product to anyone that will resell and identify the product as "organic"? Per <i>NOP regulations §205.101 Exemptions and exclusions from certification</i> , if you answer yes to the first question, and no to the second, you are exempt from certification and from submitting an organic system plan for acceptance or approval under §205.201, but must comply with the applicable organic production and handling requirements of subpart C of §205.101 and the labeling requirements of §205.310. If this is applicable to your operation, please pause completing the OSP and contact PAO.
1v	Is this a renewal? If so, has anything changed within your Operation System Plan since your last certification?	If so, has anything changed within your Operation System Plan since your last certification? If yes , summarize the changes.
1w	Have you conducted an organic self-audit?	If yes , provide the date(s) conducted. The Checklist to conduct the self-audit can be found in our Primus Auditing Ops webpage under the National Organic Program Documents section.
Section 2: Prior Organic Certification and/or Noncompliance (\$205.405(e))		
Question #	Question	Expectation
Note:	This section may not apply to your operation if you are applying for organic certification for the first time.	
2a	Has this organization ever been denied certification, suspended or revoked?	If you have ever been denied certification, suspended or revoked, mark yes and identify the name of the certifier (including PAO if applicable) and provide all documentation.
2b	Is this organization currently certified organic with another organic agency?	Indicate whether or not you are currently certified, and if so, attach your current certificate and identify the certification agency used.
2c	For first time auditees, has this organization ever been certified organic?	Indicate whether or not you have ever been certified organic in the past, and if so, attach your previous certificate. If applicable, also identify the previous certification agency used.
2d	List all non-compliances from your last certification and state how the non-compliances have been addressed.	Indicate whether or not you had any non-compliances from your last certification; this includes non-compliances issued to you anytime within the process of submitting your annual OSP or post annual audit. Check the box Non-Compliances if any, state how they were addressed & resolved, and indicate if you have attached the pertaining documents. If you had no Non-Compliances , check the box N/A .
Section 3: International Markets (\$205.201, \$205.273, \$205.300 (b)(c))		
Question #	Question	Expectation
Check if applicable	This section is not applicable to my operation	Indicate whether or not you directly import or export organic product from or to any countries outside of the United States. If yes , please do not mark this box, then list the import and/or export countries, and move on to question 3a. If no , please mark this box and move on to question 4a. Important note: If you have marked yes here, you must request the International Markets Addendum form from PAO to fill out.
3a	Select all that apply: Import Directly Import Indirectly Export Directly Export Indirectly	Check all that apply to your operation. If any of these options apply, you must also request the International Markets OSP Addendum form from PAO to fill out. If you have marked no here and are not the final exporter, but still wish to request equivalencies, you must also complete the International Markets Addendum and additionally list the market under section 5 of this OSP.
Section 4: Operation Information (\$205.201, \$205.401)		
Question #	Question	Expectation

4a	Do you manage other sites other than the site address in section 1?	Indicate whether or not you manage any other sites, both non-organic(conventional) and organic. If no , skip to question 4d. If yes , complete the following table for ALL locations managed by the Organization (non-organic & organic sites):
Section 4a Column 1	Site/ID Name	Name of the site requested for Organic certification. May be the name on legal records or a code provided by the local government office.
Section 4a Column 2	Site Address: City, State ZIP	The physical address or legal description of the site/area, City and state along with zip code.
Section 4a Column 3	Contact Name and Phone Number	Provide the name and phone number of the person who can be contacted for further information or assistance.
Section 4a Column 4	Description of Site Activities and Responsibilities:	A detailed description outlining the activities and responsibilities associated with the specific site in question.
4b	Operation Flow Diagram Attached:	The flow chart or process diagram of your operation needs to be submitted along with this OSP. Provide a schematic or written description of the process flow from receiving through to product shipping. Include equipment, all areas where processing aids are used, and any areas that are critical to maintaining organic integrity.
4c	Projected percentage of total production of organic and non-organic products:	The approximate breakdown percentage of organic vs non-organic product, in your operation.
4d	Does your operation have any certifications besides Organic?	Indicate if your operation has any certifications besides Organic. If yes , list the auditing company and scheme(s).

Section 5: Products - To be listed on Certificate by ID Mark and Market (\$205.201(a) & \$205.300)

Question#	Question	Expectation
Type of Marketing		
5a	Select all that apply: Farmers Market Direct to retail CSA/subscription service Wholesale Wn-farm retail Bulk commodities to processor Contract to buyer Other	Select all marketing types that apply to your operation. If you select Other, please provide an explanation of the type of marketing.
5b	Complete a Master Supply Chain and Product List to include all products/ingredients and suppliers. Is this document attached?	Complete a list of all suppliers and products/ingredients used/handled by your operation and attach to this OSP. Indicate if this document is attached.
5c	Do you require your organic certificate to list all ID Marks?	If yes, ensure they are all listed in the second column in 5d.
Section 5d column 1	Product Requested for Certification	The products that you are requesting for certification. If one product has more than one label, ID mark or market, list them separately (one per line).
Section 5d column 2	ID Mark (labels)	The ID mark identification that appears on the label used, or the label name by market. If you receive & distribute only, do not manipulate product or are not requesting ID marks to be identified in your certificate, list here "As previously packaged by certified supplier" .
Section 5d column 3	Specify Label Type: Select all that apply.	The correct label type, either retail, non-retail or both. Mark private if you are repacking or packing the product in any manner, under a label that is not owned by your operation. If you are using a private label, please contact PAO to obtain the private label agreement form. <i>Please note</i> that any ID marks listed on your OSP must be confirmed through your suppliers such as being identified on the organic certificates themselves. To ensure that you have marked the correct box for retail or non-retail, please refer to regulations \$205.303 & \$205.307.
Section 5d column 4	Will your operation be packing product with this ID Mark?	Will you be packing with the label/Idmark identified in column 2; yes or no.
Section 5d column 5	Organic or 100% Organic	The category given to the product. This can be found in the Organic certificate accompanied with the product received.
Section 5d column 6	International Market? Specify equivalency request:	This section of the OSP should be consistent to 3a; where you indicated if you export any product outside of the USA. Please ensure that you complete and submit an International Markets Addendum to PAO each year, for any ongoing or added equivalencies.
		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. If you plan on packing product with the labels indicated above, submit the supporting documents (artwork, supplier cert, and private label agreement).

Section 6: Biodiversity & Natural Resources (\$205.200 & \$205.207)

Question#	Question	Expectation
6a	Describe your biodiversity program:	A detailed description outlining the biodiversity program, the organization demonstrates its commitment to environmental stewardship, sustainability, and corporate social responsibility. This information also helps stakeholders understand the organization's role in biodiversity conservation and its contributions to the broader goals of ecosystem protection and
6b	Describe the natural resources within and/or surrounding your operation:	Include those that may extend beyond your property boundaries, yet which impact/are impacted by your handling operation.
Waste Management		
6c	Describe any practices in place used for waste management:	Provide details about the methods and procedures implemented to manage and handle waste within your operation. The question is seeking information on how an organization, or system deals with waste, including any established practices, protocols, or initiatives aimed at proper waste disposal, recycling, or minimizing environmental impact. The description should encompass the overall approach and specific measures taken for effective waste management.
6d	Do you recycle waste materials?	Indicate whether or not you recycle waste materials; examples of waste include packaging materials, reject product, etc. For traders, it may be appropriate to indicate any recycling practices within your operation. Please request a Trader/Broker OSP.
Energy Conservation & Air Quality		
6e	Describe any practices in place used for energy conservation (i.e. solar, wind):	Describe any practices in place for conserving energy. Such as but not limited to providing a comprehensive description of energy conservation practices, the organization demonstrates its commitment to environmental sustainability, resource efficiency, and corporate social responsibility.
6f	Describe any practices in place used for air quality management:	Describe any practices in place for air quality management practices, the organization demonstrates its commitment to environmental stewardship, public health, and corporate social responsibility. This information also helps stakeholders understand the organization's efforts to minimize air pollution impacts and contribute to cleaner, healthier air for communities and ecosystems.

Water Use

Check if applicable	This section may not be applicable to my operation	This portion may not apply to your operation.
6g	What is your water source? (i.e., on-site well, river, pond, municipal, county, etc.)	Identify the water source(s) used. For municipal sources or "other", list the name and any applicable information.
6h	Attach a copy of the water analysis verifying portability if water is from a non-municipal source.	Verify that if water is sourced from non-municipal, and indicate if you have attached the water test or analysis.
6i	Describe any practices in place used to conserve water:	Describe any practices in place to conserve water within your operation.
6j	In what capacity is water used? (i.e., cleaning and sanitation, cooking, cooling, transport, processing, etc.)	Indicate all uses of the water in your operation.

Section 7: Maintenance of Organic Integrity (\$205.270, \$205.272, \$205.300, \$205.2101(b), \$205.605)

Question #	Question	Expectation
Storage & Shipping		
Check if applicable	This section is not applicable to my operation	This portion may not apply to your operation.
7a	Describe the operations being utilized for storage :	Indicate and describe what operation are used for storage.
7b	Is your organization responsible for the transportation of the organic product?	If the organization is indeed responsible for transportation, a straightforward "yes" would suffice. Alternatively, if the organization does not handle transportation directly, the response would be "no," accompanied by an explanation of the entity or entities responsible for transportation, whether it's outsourced to a third-party logistics provider or managed by another department or partner organization.
7c	In what form are organic products received? (i.e., field bins or boxes, bulk tankers, totes, drums, bags, boxes, etc.)	"In what form are organic products received?" is to provide a description of the various forms or packaging in which organic products are typically received by the organization.
7d	In what form are finished products shipped? (for example: tote bags, cardboard drums, plastic crates, etc.)	In what form are finished products shipped? is to provide a description of the various forms of packaging in which finished products are typically shipped by the organization.

Quality Testing

	This section is not applicable to my operation	This portion may not apply to your operation.
7e	Are products ingredients sampled for quality or testing?	Indicate whether or not organic products and/or ingredients are sampled. If yes , indicate whether or not the sampling tools are dedicated to organic use only. If no , and they are shared between organic & conventional, indicate how the tools are cleaned prior to sampling organic product and/or attach your procedure.
	If yes , are sampling tools dedicated for organic use only?	
	If no , describe how sampling equipment is cleaned prior to organic sampling and or attach your procedure:	
Packaging		
7f	What type of packaging material is used?	Indicate which types of packaging are used for organic product. For example, aseptic, cardboard, glass, metal, synthetic fiber, paper, 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? If no Explain:	Indicate whether or not the packaging materials are free from synthetics. Describe how it is verified that packaging is free from synthetics. Note: any packaging materials that are used by your operation for direct contact to the product require an accompanying letter of guarantee from the manufacturer indicating that such packaging is free of synthetics.
7h	What type of packaging is used?	Indicate which types of packaging are used for organic product. For example, aseptic, cardboard, glass, metal, synthetic fiber, paper, plastic, etc.
7i	Is the packaging food grade?	Indicate whether or not the packaging materials are food grade. Note: any packaging materials used by your operation for direct contact to the product, require an accompanying letter of guarantee from the manufacturer indicating that such packaging is food grade.
7j	Are packaging materials and /or containers ever re-used? (i.e. totes, bins cardboard cartons)	Indicate whether or not packaging or containers are ever re-used; such materials may include totes, bins, cardboard cartons, plastic clamshells, etc. If yes , indicate what the previous use was and describe the cleaning procedure performed prior to reuse.
Section 8: Record-Keeping System (§205.103 & §205.400)		
Question #	Question	Expectation
Traceback/Supply Chain		
13a	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):	Describe how your recordkeeping system is use to track the final product back to the original purchase or receiving. Indicate any pertaining records that you use to traceback product.
13b	Describe your lot and or numbering system (or list the name of attached procedure):	Describe the lot or numbering system of your operation, and the relation of the lot or numbering used, to the traceability of the product. It may be appropriate to provide a sample lot or traceability number and describe the linking agents.
13c	How do you ensure the lot number is placed on the product packaging?	The lot number or code system equivalent is crucial for traceability and quality control purposes. To ensure it's accurately placed on the product packaging, does your operation have established standard operating procedures (SOPs) that detail the exact location and method of application for the lot number. Is your staff trained to follow these procedures meticulously, and do you conduct regular checks to verify compliance.
13d	Do traceability records identify the organic product with its applicable claim (i.e. 100% organic, organic, made with organic, etc.)?	The traceability records associated with organic products must clearly indicate the specific organic claim associated with each product. The response should describe how the traceability system is structured to accurately link each product to its corresponding organic claim, such as "100% organic," "organic," "made with organic," or any other relevant designation. This may include details about labeling practices, documentation procedures, or database entries that ensure the organic claim is accurately recorded and tracked throughout the supply chain.
Records		
13e	What records do you keep on file for organic production?	List and or provide the specific records and documents that are kept on file to demonstrate compliance with organic certification standards and regulations. This may include, but is not limited to: Organic certification documents: Copies of organic certification certificates, renewals, and correspondence with certifying agencies. Crop production records: Documentation of planting dates, seed sources, crop rotations, field maps, and harvest yields for organic crops. Livestock management records: Records of animal health treatments, feed sources, pasture management, and livestock movements for organic livestock production. Input usage records: Records of all inputs used in organic production, including fertilizers, pesticides, herbicides, and soil amendments, along with their organic certification status. Traceability records: Documentation of product traceability throughout the supply chain, including purchase invoices, sales records, and shipping documents. Soil and water testing results: Records of soil fertility tests, water quality assessments, and any remediation efforts undertaken to maintain organic soil and water quality standards. Organic handling and processing records: Documentation of procedures and practices for handling, processing, and labeling organic products, including cleaning protocols, equipment maintenance logs, and packaging materials used. Inspection and audit reports: Records of internal audits, third-party inspections, and corrective action plans implemented to address any non-compliance issues identified during inspections.
13f	Are all records that verify organic compliance maintained for a minimum of 5-years beyond creation?	Confirm whether the individual or organization adheres to the requirement of retaining records related to organic compliance for a specific duration, typically at least 5 years from the date of creation.
13g	Which records do you keep for non-organic production?	Check the box pertaining to the records that you keep on file for non-organic production. If other , list here. If you do not have non-organic production, check the box Not applicable .
13h	Describe the monitoring practices and procedures to be performed by your organization, identified in this Organic System Plan and operation practices.	Describe the detailed methods and protocols used to monitor and oversee organic production activities as outlined in the Organic System Plan (OSP) and operational practices.
13i	How are these monitoring practices and procedures effectively implemented and how frequently are they performed?	A detailed explanation of how the monitoring practices and procedures outlined in the Organic System Plan (OSP) and operational practices are put into action and the frequency at which they are carried out.
Organic Fraud Prevention		
13j	Describe your organic fraud prevention program.	Describe a comprehensive overview of the measures and protocols implemented by the organization to prevent and mitigate the risk of organic fraud. Organic fraud prevention programs are designed to safeguard the integrity of organic products and ensure compliance with organic certification standards and regulations. This may include, but is not limited to: Risk Assessment: Description of the process used to assess potential risks of organic fraud within the organization's supply
13k	Describe the documents you maintain for your organic fraud prevention program.	You should submit the documents you maintain for your organic fraud prevention program. This may tie in with the previous question. Describe the documents maintained by the organization to support its efforts in preventing and mitigating organic fraud. These documents are essential for demonstrating compliance with organic certification standards and regulations, as well as for internal monitoring and auditing purposes.

13l	How do you monitor the effectiveness of the organic fraud prevention program?	<p>Describe how you obtain information on the methods and processes used by your organization/operation to assess the performance and efficacy of its organic fraud prevention efforts. This may include, but is not limited to:</p> <p>Performance Metrics: Description of key performance indicators (KPIs) or metrics used to evaluate the effectiveness of the organic fraud prevention program. This may include metrics related to the frequency and severity of fraud incidents, compliance with organic certification standards, and the success rate of corrective actions implemented.</p> <p>Monitoring Activities: Explanation of the monitoring activities conducted to assess the program's effectiveness, such as regular inspections, internal audits, and third-party certification audits. This may also include ongoing review of documentation, records, and reports related to organic fraud prevention.</p> <p>Data Analysis: Discussion of how data collected from monitoring activities and performance metrics is analyzed to identify trends, patterns, and areas for improvement in the organic fraud prevention program. This may involve conducting root cause analysis to determine the underlying causes of fraud incidents and implementing targeted interventions to address them.</p> <p>Stakeholder Feedback: Explanation of how feedback from internal stakeholders, such as employees and management, as well as external stakeholders, such as suppliers and customers, is solicited and incorporated into the monitoring process to enhance the program's effectiveness.</p> <p>Continuous Improvement: Description of how findings from monitoring activities and data analysis are used to drive continuous improvement in the organic fraud prevention program. This may involve revising policies and procedures, updating training programs, implementing new control measures, and refining monitoring protocols to address identified weaknesses and emerging threats.</p>
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Section 9: Traceback and Mass Balance (§205.103 & §205.400(g)(8)(9))

Please take the time to carefully read through this section of the OSP and ensure that you are prepared to conduct these exercises for the inspector at the time of your organic inspection. Please keep in mind that if you are not prepared with the necessary records for the onsite inspection a re-inspection or denial of your organic certification may occur.

	List any inputs used, including but not limited to cleaners, disinfectants, sanitizers, harvest fungicides or insecticides, waxes, coats, seals, wash water additives, pest control, etc.	The list should encompass a wide range of substances, such as cleaners, disinfectants, sanitizers, harvest fungicides or insecticides, waxes, coats, seals, wash water additives, pest control measures, and any other materials applied or introduced as part of the processes or activities under consideration.
Section 9 column 1	Input Utilized For:	Details about the function or role of the input in the processes or activities with in the operation. Whether it's a substance, material, or component, the description should clarify how the input is utilized, its significance, and the specific objectives it serves within the operation.
Section 9 column 2	Brand Name (List specific formulation)	This involves specifying the unique compositions or ingredients that make up each product associated with the mentioned brand names.
Section 9 column 3	Ingredients (Including any inserts, additives, preservatives, coadjuvants, inoculants, etc.)	Active ingredient(s), concentration levels, inert ingredients, and any other relevant details that define the composition of the product.
Section 9 column 4	Direct Contact With Food or Food Contact Surfaces?	List any direct contact between a particular item, substance, or material and food or food contact surfaces within a specific context.
Section 9 column 5	Compliance Approval by:	Describe if the component was verified for compliance approval by an agency such as OMRI, WSDA, CDFA or other.
Section 9 column 6	Label and Compliance Approval Documentation Attached	The label and compliance approval records for each component/input.
Section 9 column 7	If Product Has Restrictions (Allowed in the National List but with annotations), Describe How You Comply with this NOP Rule Annotation	A detailed description of how the organization complies with NOP rule annotations for products with restrictions, the organization demonstrates its commitment to upholding the integrity and transparency of organic production practices and ensuring compliance with regulatory requirements.

Section 10: Affirmation (§205.406 & §205.403(b))

Please read the affirmation and upon agreeing, sign & date below. Please note that the OSP must contain both the date and the name of the individual completing it. OSPs lacking this information will not be accepted.



