



## Handler and Processor Organic System Plan – WSDA Organic Program

**Business Name:** \_\_\_\_\_ **Cert No:** \_\_\_\_\_

### Section A: Product Flow

**205.201**

This Organic System Plan (OSP) is the foundation for your organic certification. This document must accurately describe your business and practices. WSDA Organic Program will evaluate the plan to determine your business' compliance with USDA organic regulations (7CFR Part 205). Once certified, the OSP should be considered an agreement between your business and WSDA Organic Program on how you will maintain the integrity of organic products handled by your business.

Your OSP must be reviewed regularly by your staff and employees. Relevant sections must be updated and submitted to WSDA for review when changes occur within your business or handling activities.

**OSP section update forms are available on the WSDA Organic Program website at:**  
<https://agr.wa.gov/departments/organic/forms-and-applications>

**Handle.** To sell, process, or package agricultural products, including but not limited to trading, facilitating sale or trade on behalf of a seller or oneself, importing to the United States, exporting for sale in the United States, combining, aggregating, culling, conditioning, treating, packing, containerizing, repackaging, labeling, storing, receiving, or loading.

1. Provide an overview of your business and handling activities. Include a summary of the type of products you handle in a nonorganic form as well as the products you plan on handling in an organic form.
  - Separate list of products attached.

2. Does your business only handle organic products on a seasonal basis?
  - Yes, seasonal activities are detailed in the table below.
  - No, all organic handling activities are consistent year-round.

2a. If yes, provide an estimate for when organic handling activities generally occur:

Organic Activity	Estimated Start Date	Estimated End Date
<i>Example: Packing apples, pears</i>	<i>August 15</i>	<i>April 1</i>



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3. Attach a **schematic flow chart** for each organic handling activity, showing organic products brokered, traded, stored, processed, or otherwise handled by your business. Your flow charts must:
- **Show** the movement of organic products, from incoming acquisition/receiving through processing, packing, and storage to outgoing sale/shipping.
  - **Identify** where organic products leave and enter your system (e.g. custom storage, contract handling, or co-processing).
  - **Indicate** at what step post-harvest materials are applied, or ingredients and processing aids are added.

Product flow charts attached.

4. Provide the **floor plan** for your facility(s). Your floor plans must:
- Identify all **storage areas** associated with organic products, including incoming inventory, partially packed products, packaging material, and finished product. Identify non-organic products storage as well.
  - Identify all **equipment** used with organic products.
  - Identify where **prohibited input materials** may be applied (i.e. in storage areas or on equipment shared with both organic and non-organic products).

Floor plans attached.

Not Applicable – My business does not take physical possession of any organic products.



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### Section B: Harvest

205.103, 205.270, 205.272

1. Does your business provide or return harvest containers to growers for use with organic crops?

Yes

No - *Skip to next question.*

1a. If yes, what type of material are harvest containers made of? *Check all that apply.*

Plastic

Metal

Cloth

Wood

Cardboard

Other: \_\_\_\_\_

1b. Are all harvest containers **permanently** and clearly stamped with an organic designation?

Yes

No

1bi. If no, how do you ensure harvest containers do not contaminate organic crops?

Containers made of plastic, metal, or cloth are thoroughly cleaned after use with nonorganic crops.

Containers made of cardboard have not been exposed to prohibited materials.

Containers made of wood are completely lined with plastic.

Other - *Describe below.*

1bii. What record is provided to the grower to verify the harvest containers do not pose a risk?

Seasonal attestation is provided regarding how containers are cleaned prior to distribution.

Seasonal attestation is provided confirming the container and organic crop will not be submerged in a dump tank after harvest.

Other - *Describe below.*

**The use or reuse of any bin, box, or container that was exposed to a prohibited material in the past is not allowed for use with organic crops**, unless the container can be and has been thoroughly cleaned and no longer poses a risk of contamination.

**Containers made of porous materials**, such as wood or cardboard, **cannot be adequately cleaned** after exposure to prohibited materials.

**Records must be available** at inspection to demonstrate there is not a risk of contamination from the reuse of a container that was previously drenched, fumigated, or otherwise exposed to prohibited organic materials.



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2. Does your business arrange for, or is your company responsible for the harvest of organic crops?

Yes

No

2a. If yes, is harvest equipment dedicated to organic crops?

Yes, complete 2ai below.

No, complete 2aai below.

2ai. If yes, describe how you identify the dedicated equipment and list the records you provide to growers to confirm your equipment does not pose a risk to organic crops:

2aai. If no, describe the cleaning records you provide to growers to verify nondedicated or shared equipment is thoroughly cleaned and/or purged prior to use with organic crops:







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3. How are incoming organic products received at your business' physical location/facility? *Check all that apply.*

- My business does not take physical possession of organic products. *Skip to next section.*
- Sealed, impermeable retail package
- Sealed, impermeable non-retail container
- Permeable package with tamper evident seals
- Boxes, bins, or otherwise unsealed containers
- Bulk truck or trailer
- Other: \_\_\_\_\_

4. What **unique identifier** links incoming product to acquisition and receiving records?

- Non-retail containers arrive labeled with unique identifiers (e.g. lot numbers) that also appear on accompanying records.
- Bulk transport units have unique identifiers (e.g. container numbers) that also appear on accompanying records.
- Individual retail units of packaged product are clearly described on receipts.

Additional details regarding the unique identifiers:

5. How is the **organic status displayed** on incoming organic products?

- Non-retail containers labeled "organic", "ORG" or similar (*describe*): \_\_\_\_\_
- Temporary signage identifies bulk transport units as "organic", "ORG" or similar (*describe*): \_\_\_\_\_
- Retail packaging makes organic claims.

Additional details regarding how the organic status is displayed:

6. Describe the steps for receiving and verifying organic products upon arrival at your facility. *Include details about the department or position responsible for each step and note how each step is recorded.*



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7. Describe your steps for holding or rejecting products if the organic status cannot be verified upon arrival. *Include details about how employees are notified, how the status of the product is identified physically and in records, and where the product is stored.*
8. Do you unload organic product from bulk transport vehicles at your business' physical location/facility?
- Yes
- No
- 8a. If yes, describe how you prevent unpackaged organic product from contact with non-organic product or prohibited residues during receiving:





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Business Name: \_\_\_\_\_ Cert No: \_\_\_\_\_

### Section E: Imports - International Trade

205.103, 205.300, 205.273

1. Which of the following organic import activities is your business involved in? *Check all that apply.*
  - My business purchases organic products from foreign suppliers.
  - My business brokers or otherwise facilitates the import of organic shipments.
  - My business is the importer of record on organic shipments into the U.S.
  - My business is the first organic operation in the US to physically receive imported organic products.
  - None of the above - *Skip to next section.*
  
2. Describe how you verify imported organic products and/or ingredients were not treated with prohibited substances or irradiated during transport/entry to the United States.  
*Include details about how product is packaged, what organic claims are made on labels and all documentation, and how you are notified of any treatments during transportation.*
  - All imported products are imported in retail-labeled, impermeable packages.
  
3. Describe any specific practices or records your business implements to verify incoming imported organic products.
  - Verification practices are the same for international and domestic receiving and fully described in the **Incoming Products** section of my Organic System Plan.
  
4. Does your business import (as the importer of record), or facilitate the import of, organic products into the U.S.?
  - Yes
  - No - *Skip to the next section.*

**Both the exporter in a foreign country and the importer must be certified** to bring agricultural products into the U.S. with organic claims. Buying – even small quantities of retail-packaged products – from a foreign supplier is importing. For more information: <https://www.cbp.gov/trade/basic-import-export>

**A valid NOP Import Certificate, issued by the exporter's organic certification agency, must accompany every organic import transaction.** The importer is responsible for ensuring the NOP Import Certificate is presented to U.S. Customs & Border Protection through the **Automated Commercial Environment (ACE) system.**



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5. Complete the following table for *each country* you source organic products or ingredients from:

Country of Export	Certification Standard						Documentation accompanying each shipment						
	USDA NOP 7 CFR Part 205	USDA NOP 7 CFR Part 205 with Canadian Equivalency	Canadian Organic Standards CAN/CGSB-32.310 - 2020 with US equivalency	Reg (EU) No. 2018/848 (European Union)	Reg (EC) No. 837/2007 (United Kingdom)	Other (Specify)	NOP Import Certificate	Phytosanitary Certificate	Transaction Certificate	Bill of Lading	Country of Origin Certificate	Invoice	Other (Specify)
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

6. Describe how you ensure the NOP Import Certificate and other standard import documentation is uploaded to ACE for each shipment. *Include details about any customs brokers or logistics operations that complete this requirement on your behalf.*



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### Section F: Post-Harvest & Processing Input Materials 205.105, 205.272

Not Applicable – My business does not take physical possession of any organic products (e.g. brokers and traders). *Skip to next section.*

1. Does your business apply any inputs directly to any crops or products at this facility? *Consider all inputs applied directly to either organic or non-organic product during receiving, storage, handling, or processing.*
  - Yes
  - No - *Skip to next section.*
  
2. Indicate **all** type(s) input materials used in direct contact on products (non-organic **or** organic) at your facility:
 

<input type="checkbox"/> Anti-foaming agents	<input type="checkbox"/> Anti-fungal agents	<input type="checkbox"/> Anti-microbial agents
<input type="checkbox"/> Anti-ripening agents	<input type="checkbox"/> Antioxidants	<input type="checkbox"/> Feed antibiotics
<input type="checkbox"/> Feed coccidiostats	<input type="checkbox"/> Flootation agents	<input type="checkbox"/> Packaging gases
<input type="checkbox"/> Preservatives	<input type="checkbox"/> Release agents	<input type="checkbox"/> Ripening agents
<input type="checkbox"/> Sanitizers – washes	<input type="checkbox"/> Sprouting inhibitors	<input type="checkbox"/> Waxes – coatings
<input type="checkbox"/> Other: _____		
  
3. Does your operation use input materials on non-organic products that are **not** used on organic products?
  - Yes
  - No, only organically approved inputs are used at this facility.

3a. If yes, complete the following table detailing the **inputs used exclusively on non-organic products** and how you prevent contact with organic products.

Input type & active ingredient in input	Non-organic product treated	Application method and Location	Practices used to prevent contamination of organic crops or products <i>Your preventative practices must be documented, and the records must be available for review during an inspection.</i>
Example: Fruit wax with fludioxonil	Apples	Wax spray bar – pack line	Clean entire line, use dedicated organic brushes. Organic brushes are identified with a yellow stripe.
Example: DPA	Apples	Drencher	Use of clean, plastic harvest bins for organic. Trucks never haul organic and conventional harvest on same load.



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- 3b. How do you monitor that your practices are sufficient to prevent contamination of organic products from prohibited post-harvest or processing inputs? *Include details about the frequency of your monitoring and any testing of products that may occur.*

4. Use the table below to describe how your business records each direct application of input materials to both organic or non-organic products handled at your facility.

*Records must detail the specific input material used, date and location applied, and the specific product treated.*

Record Name	Activity Documented	Responsible Position Title or Service Provider Name



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### Section G: Processing, Packing Activities

205.103, 205.270, 205.272

1. Does your business work with a third-party to process, pack, label, treat, mix, or otherwise custom handle organic ingredients or products on your behalf?

Yes - An [Additional Facilities and Third-Parties \(AGR 2519\)](#) form is attached.

No

- 1a. If yes, describe how you verify the operation is certified according to USDA organic standards for the service and products:

- 1b. How frequently do you verify the third-party's organic certification status?

With every order    Monthly    Annually

Other: \_\_\_\_\_

2. Does your business process, pack, or otherwise handle organic products at your physical location/facility?

Yes

No, my business does not take physical possession of any organic products. *Skip to next section*

3. Do **all** organic products arrive and remain in the same container or package throughout your control?

Yes - *Skip to next section.*

No

4. Does your business remove organic products for reconditioning and pack them back into their original container or package?

Yes

No

- 4a. If yes, describe your reconditioning process and how these steps are recorded.



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5. Describe how production staff select, verify and stage raw materials, ingredients, or processing aids for organic packing or processing.

6. Describe how partial pallets/boxes/drums of organic products and ingredients are labeled, identified on records and placed back in inventory.

7. Do you store organic work-in-progress product (e.g. roasted coffee prior to packaging, base mixes, partially processed product during fermenting or proofing step)?

Yes

No

7a. If yes, complete the following table for each possible work-in-progress product:

Product Stage	How Product is Identified During Storage	Length of Time
<i>Example: Bulk roasted coffee</i>	<i>In red, dedicated bins. Labeled with roast batch code (includes "O" for organic, origin, and date)</i>	<i>1-3 days</i>



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8. Are packages or containers reused?

Yes

No

8a. If yes, what material are reused containers made of? *Check all that apply.*

Plastic     Metal     Cloth     Wood     Cardboard

Other (*specify*): \_\_\_\_\_

8b. Are all reused containers **permanently** and clearly stamped with an organic designation?

Yes

No

8bi. If no, how do you ensure reused containers do not contaminate organic products?

Containers made of plastic, metal, or cloth are thoroughly cleaned after use with nonorganic products.

Containers made of cardboard have not been exposed to prohibited materials.

Containers made of wood are completely lined with plastic.

Other - *Describe below.*

8bii. For reused wood bins, what information is provided to customers to ensure organic integrity is maintained upon receipt?

Not applicable, my business does not reuse wood bins or containers.

Instructions informing the customer that the lined wood bin should not be submerged in a dump tank.

Other *Describe below.*

**The use or reuse of any bin, box, or container that was exposed to a prohibited material in the past is not allowed for use with organic products**, unless the container can be and has been thoroughly cleaned and no longer poses a risk of contamination.

**Containers made of porous materials**, such as wood or cardboard, **cannot be adequately cleaned** after exposure to prohibited materials.



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Business Name: \_\_\_\_\_ Cert No: \_\_\_\_\_

### Section H: Water

205.103, 205.272, 205.105

- Not Applicable – My business does not take physical possession of any organic products (e.g. brokers and traders). *Skip to next section.*
- Not Applicable – All organic products are received in a container and remain in the same container throughout my control and subsequent shipping. *Skip to next section.*

1. How is water used in organic handling at your facility?

- No water used – *Skip to next section.*     Cleaning equipment     Cleaning organic products  
 Cooling     Heating     Ingredient  
 Product transport (fruit floating)     Other: \_\_\_\_\_

2. Source of water:

- Municipal     On-site well     Other: \_\_\_\_\_

3. Is water treated on-site (e.g. UV, carbon filtration, water softeners, pH adjustment)?

- Yes  
 No

3a. If yes, is treated water still considered potable (meets Safe Drinking Water Act standards)?

- Yes  
 No

3b. Describe how you manage your water system for safe drinking and quality purposes.

*Include details about your water monitoring practices.*

4. Are chlorine materials used in wash water or flume water during organic handling?

- Yes  
 No - *Skip to next question.*





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4a. If yes, complete the following table detailing how chlorine products are used:

Location	Organic Product(s)	Chlorine Rate	Rinse Step
<i>Example: Dump tank</i>	<i>Apples</i>	<i>100-200 ppm</i>	<i>Potable water at spray bar 1</i>

4b. How do you monitor the rinse step is sufficient to reduce chlorine levels on the organic product below Safe Drinking Water Act (SDWA) standards of 4 ppm Cl<sub>2</sub> or 0.8 ppm ClO<sub>2</sub>?

*Include what tests you use, where in the process you test the rinse, how often you conduct tests, and how you document results.*

N/A, chlorine is never used above SDWA levels (4 ppm Cl<sub>2</sub> or 0.8 ppm ClO<sub>2</sub>)

5. Do you use steam in direct contact with any of the following:

- Yes, on organic products.
- Yes, on surfaces used in organic handling.
- Yes, on packaging used in organic handling.
- No, none of the above.

5a. If yes, describe how you prevent boiler additives from contacting organic products.

- No boiler additives are used.
- The boiler water additives used are not volatile amines, ammonium hydroxide, or trisodium nitrilotriacetate.
- Volatile boiler additives are used but are shut off prior to organic processing using the following procedures. *Describe how you determined the shut-off procedure is sufficient and the names of records used to document this practice.*



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### Section I: Outgoing Products

205.103, 205.270, 205.272

1. Check all activities that apply to your business:
  - My business sells or markets organic products
  - My business physically distributes or ships organic products
  - My business arranges sales of organic products between buyers and sellers without taking title or possession.
  
2. Does your business **arrange** the transloading or cross-docking of any organic products with a third-party?
  - Yes - An [Additional Facilities and Third-Parties \(AGR 2519\)](#) form is attached.
  - No
  
3. What type of packaging is used for organic products you sell or ship? *Check all that apply.*
  - Not applicable – My business *only* arranges sales without taking title or possession. *Skip to next section.*
  - Sealed, impermeable retail packaging
  - Sealed, impermeable non-retail containers
  - Permeable packaging with tamper-evident seals
  - Unsealed pouches, clamshells, or other retail packaging that is not tamper-evident
  - Bulk truck or trailer loads
  - Other: \_\_\_\_\_
  - 3a. If tamper-evident seals are used, describe the type of seal(s) used and how the seal works.
    - Photo attached that demonstrates how the seal appears when broken or tampered with.
  
4. What **unique identifier** links the physical product to outgoing audit trail documents?
  - Non-retail containers are labeled with unique identifiers (e.g. lot numbers) that also appear on accompanying records.
  - Bulk transport units have unique identifiers (e.g. container numbers) that also appear on accompanying records.

Note any additional details regarding the unique identifiers:



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5. How is the **organic status displayed** on outgoing organic products?
- Non-retail containers labeled “organic”, “ORG” or similar:
  - Temporary signage identifies bulk transport units as "organic", “ORG” or similar:
  - Retail packaging makes organic claims.
- Note any additional details regarding how the organic status is displayed:
- 
- 
6. Describe your steps for shipping organic products. *Include details about what position is responsible for each step and how each step is recorded.*
- 
- 
- 
- 
- 
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- 
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- 
7. Are organic products shipped in the same transport units as non-organic products?
- Yes
  - No
- 7a. If yes, indicate what steps are taken to segregate organic products.
- Organic product sealed in impermeable containers
  - Organic product shrink wrapped
  - Separate area in transport unit
  - Use of separate pallets
  - Other: \_\_\_\_\_
8. Do you **physically load** organic product into bulk transport vehicles?
- Yes
  - No
- 8a. If yes, how does your business verify outgoing transport units are cleaned prior to loading organic?
- Clean truck / equipment affidavits
  - Clean out records
  - Other: \_\_\_\_\_



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### Section J: Exports - International Trade

205.103, 205.300, 205.272

Organic products must be labeled in accordance with the destination market requirements.

Review the WSDA Organic Program **Guide to International Markets (AGR 4010)** for information on additional requirements for organic products. This helpful guide and instructions for requesting required export certificates is on WSDA Organic Program's website: <https://agr.wa.gov/departments/organic/resources/international>

1. Do you sell, ship or label any products that **do not** meet US organic labeling requirements because they are labeled for an international organic market?

Yes

No

- 1a. If yes, how do you ensure the **shipping containers** are clearly marked "For Export Only"?

- 1b. List the corresponding **shipping records** that are clearly marked "For Export Only".

2. Do you produce or trade any organic products which may be exported to **Canada**? *Consider both products you export directly, as well as products you represent to customers as eligible for export to Canada.*

Yes

No - *Skip to next question.*

- 2a. If yes, how do you verify organic products you handle qualify for export to Canada?

Supplier certificates for ingredients or products include the statement, "Certified in accordance with the terms of the US-Canada Organic Equivalency Arrangement."

Growers provide annual affidavits that affirm crops were not grown using sodium nitrate or hydroponic/aeroponic production methods.

Non-ruminant livestock producers provide annual affidavits that affirm animals were managed in accordance with livestock stocking rates set out in Canadian organic regulations.

Other: \_\_\_\_\_



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2b. Are **all** organic products you handle eligible for export to Canada?

- Yes, the verification above is performed for all incoming organic products.  
 No, only some products are verified as eligible to export to Canada.

2bi. If no, how do you track the Canadian eligibility of organic products internally?

2c. How do you communicate to your customers which organic products are eligible for export to Canada?

2d. How do you ensure an organic certificate with the required attestation statement accompanies each shipment to Canada?

- Not applicable, my business does not ship or sell directly to Canada.  
 My business' organic certificate is included in the audit trail records provided to the Canadian customer for each transaction.  
 Other: \_\_\_\_\_

2e. How are organic products packaged for export?

- Not applicable, my business does not ship or sell directly to Canada.  
 Bulk, unpackaged shipments  
 Non-retail containers  
 Packaged product, labeled for retail sale  
 Other: \_\_\_\_\_

3. Do you sell, ship or label any organic products for export to **any other international market**?

- Yes  
 No – *Skip to next section.*



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4. Do you sell, ship or label any organic products for export to **Mexico**?
- Yes
- No – *Skip to next question.*
- 4a. If yes, how is the final handling certified to Mexico's Organic Product Law (LPO)?
- My business is LPO-certified and a copy of the LPO certificate is attached. List LPO certifier here: \_\_\_\_\_
- My business works with an LPO-certified exporter and a copy of their LPO certificate is attached. List the LPO certifier here: \_\_\_\_\_
- Other: \_\_\_\_\_
5. Do you sell, ship or label any organic products for export to **Japan**?
- Yes
- No - *Skip to next question.*
- 5a. If yes, how are organic products packaged for export?
- Bulk, unpackaged shipments
- Non-retail containers
- Packaged product, labeled for retail sale
- Other: \_\_\_\_\_
- 5b. How do you ensure organic products display the required JAS logo?
- Not applicable, products exported to Japan are not currently regulated by JAS.
- Exported products are further processed or labelled in Japan by a JAS certified importer and a copy of the importer's JAS certificate is attached.
- My business applies the required JAS logo under contract with a JAS-certified customer and a copy of the co-packing contract and my customer's JAS certificate is attached.
- My business is JAS certified by a JAS accredited certification agency and a copy of my business' JAS certificate is attached.
- Other: \_\_\_\_\_
- 5c. How do you ensure the required TM-11 export document accompanies each shipment to Japan?
- Not applicable, my business is JAS certified by a JAS accredited certification agency.
- Not applicable, my business only labels products for export; the TM-11 is the exporter's responsibility.
- As the exporter, my business completes the WSDA Organic Program application for a TM-11 prior to each shipment to Japan.
- Other: \_\_\_\_\_
6. Do you sell, ship or label any organic products for export to **Taiwan**?
- Yes
- No - *Skip to next question.*
- 6a. If yes, how do you verify products **derived from livestock** qualify for export to Taiwan? *Livestock products must be derived from animals not treated with antibiotics, or systemic use of pain killers or analgesics, including the use of Lidocaine.*
- My business does not export organic livestock products to Taiwan.
- Other: \_\_\_\_\_



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- 6b. How do you ensure the required TM-11 export document accompanies each shipment to Taiwan?
- Not applicable, my business only labels products for export; the TM-11 is the exporter's responsibility.
  - As the exporter, my business completes the WSDA Organic Program application for a TM-11 prior to each shipment to Taiwan.
  - Other: \_\_\_\_\_
7. Do you sell, ship or label any organic products for export to the **European Union** or **Great Britain**?
- Yes
  - No - *Skip to next question.*
- 7a. If yes, how are organic products packaged for export to the European Union or Great Britain?
- Bulk, unpackaged shipments
  - Non-retail containers
  - Packaged product, labeled for retail sale
  - Other: \_\_\_\_\_
- 7b. How do you ensure the required Certificate of Inspection (COI) is issued for each shipment **prior to leaving the US**?
- Not applicable, my business only labels products for export; the COI is the exporter's responsibility.
  - The importer in the EU or Great Britain drafts the COI and my business emails the supporting documents to WSDA Organic Program at least 2-3 business days prior to shipment.
  - As the exporter, my business drafts the COI and emails the supporting documents to WSDA Organic Program at least 2-3 business days prior to shipment.
  - Other: \_\_\_\_\_

**Wine handlers** must also have an [EU Wine Application](#) on file with WSDA for each wine that may be exported.

8. Do you sell, ship or label any organic products for export to **Korea**?
- Yes
  - No - *Skip to next question.*
- 8a. If yes, how are organic products packaged for export?
- Bulk, unpackaged shipments
  - Non-retail containers
  - Packaged product, labeled for retail sale
  - Other: \_\_\_\_\_
- 8b. How do your products meet the Korean definition of a "processed food"?
- Not applicable, my business is certified by a Korean accredited certification agency and a copy of my business' Korean organic certificate is attached.
  - Organic products are multi-ingredient.
  - Organic products include food additive(s) other than salt.
  - Organic products are transformed (e.g. grinding or cutting) until the original form of the raw material is no longer recognizable.



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Other: \_\_\_\_\_

8c. How do you ensure the required NAQS export document accompanies each shipment to Korea?

Not applicable, my business exports under our Korean organic certification.

Not applicable, my business only labels products for export; the NAQS is the exporter's responsibility.

As the exporter, my business completes the WSDA Organic Program application for a NAQS document prior to each shipment to Korea.

Other: \_\_\_\_\_

9. Do you sell, ship or label organic products for export to **any other international market**, not mentioned above?

Yes

No - *Skip to next section.*

9a. If yes, list market(s) below:

9b. How do you ensure exported organic products meet any additional requirements of the destination country?

**Additional resources on destination country requirements are available at [globalorganictrade.com](http://globalorganictrade.com).**







## Handler and Processor Organic System Plan – WSDA Organic Program

2. Do you perform a full cleaning of these surfaces and equipment prior to handling organic products?
- Yes  
 No
- 2a. If no, describe the steps you take to ensure organic ingredients and products are not exposed to nonorganic ingredients or products and prohibited substances.
3. Describe the differences in chemicals or procedures used to clean or purge equipment prior to organic vs non-organic handling.
- Not Applicable - All equipment is dedicated for use with organic crops or products only.  
 Not Applicable - The same cleaning materials and procedures are used regardless of organic status.
4. What cleaning methods are used on surfaces and equipment that come in direct contact with organic products? *Check all that apply.*
- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Clean in place        | <input type="checkbox"/> Compressed air | <input type="checkbox"/> Manual washing |
| <input type="checkbox"/> Purging of equipment* | <input type="checkbox"/> Sanitizing     | <input type="checkbox"/> Scraping       |
| <input type="checkbox"/> Soap and water        | <input type="checkbox"/> Steam cleaning | <input type="checkbox"/> Sweeping       |
| <input type="checkbox"/> Vacuuming             | <input type="checkbox"/> Other: _____   |   |
- \*For all equipment cleaned using a purge of organic products, submit documentation outlining your procedures and how you determined purge quantities are adequate for the capacity of the equipment.
- Equipment purge amounts and procedures attached.
5. Do you use any residual sanitizers (e.g. quaternary ammonium) on surfaces or equipment that come in direct contact with organic products?
- Yes  
 No
- 5a. If yes, describe how you **remove residual sanitizers** prior to organic handling.



## Handler and Processor Organic System Plan – WSDA Organic Program

- 5b. Describe the testing protocol used to verify **no residual sanitizers remain** prior to handling organic products. *Include the type and range of test strips used, and how the results are documented.*



## Handler and Processor Organic System Plan – WSDA Organic Program

6. Complete the table below to **identify the records used to document equipment is cleaned or purged** prior to organic handling and how these records link or correlate to production records.

Document Name	Activity Record Describes	How does record link to production records?

7. Does your business rely on a **third-party** to clean containers or equipment used during organic handling or processing (e.g. reusable plastic containers, mobile bottling lines, bulk liquid trucks)?

Yes

No

- 7a. If yes, describe the arrangement and the records provided by the third-party to verify residual sanitizers (e.g. quaternary ammonium products) are not used:



## Handler and Processor Organic System Plan – WSDA Organic Program

Business Name: \_\_\_\_\_ Cert No: \_\_\_\_\_

### Section L: Storage

205.307, 205.272

1. Do you contract with any third parties to store organic ingredients or products on your behalf?
- Yes – An [Additional Facilities and Third-Parties \(AGR 2519\)](#) form is attached.
- No

#### Records must track the movement of organic ingredients and products through third-party storage.

2. Does your business physically store any organic ingredients or products?
- Yes - storage occurs at my business' primary location/facility.
- Yes – storage occurs at an additional location/facility under control by my business.
- No - *Skip to next section.*
3. Are all organic crops or products stored in sealed, impermeable packages?
- Yes
- No
- 3a. If no, how do you prevent organic products from contamination by prohibited substances and commingling with non-organic crops during storage?
- Organic crops are stored in rooms **permanently dedicated for organic use only.**
- Organic crops are stored in rooms that are cleaned and **dedicated for organic use for the entire season.**
- Packaged organic products are stored in area/shelf designated with organic signage.
- Other - *Describe:*
- 3b. What records document where organic crops and bulk organic products are stored and how the area was cleaned for organic use?
- Not applicable – All organic products are packaged in storage.



## Handler and Processor Organic System Plan – WSDA Organic Program

3c. Describe how bulk organic products display a unique identifier or lot number and the product's organic status **while in storage**:

Not applicable – my business does not store bulk, unpackaged organic products.

4. Do you store labels, packaging and containers intended for use with organic products?

Yes

No

4a. If yes, how do you protect these materials from contact with prohibited substances during storage?

4b. If yes, where are labels, packaging and containers stored?



## Handler and Processor Organic System Plan – WSDA Organic Program

**Business Name:** \_\_\_\_\_ **Cert No:** \_\_\_\_\_

### Section M: Pest Management

**205.271**

Not Applicable. My business does not take physical possession of any organic products (e.g. brokers and traders). *Skip to next section.*

1. What type of pest management system does your facility use?

In-house

Contract pest control service. Business name: \_\_\_\_\_

**You must notify all outside pest control services that your business handles organic products.**

**A pest control plan suitable for organic production must be in place and described in your business' organic system plan. All pest management records must be readily available for inspection.**

2. Check all potential pest problems at your facility:

Birds       Crawling insects       Flying insects

Rodents       Stored product pests       Other: \_\_\_\_\_

3. Describe the practices used to monitor and manage pest pressures.

*Include frequency of monitoring and how these practices are documented.*

4. Check all pest management practices used:

**Preventative:**

Clean up spilled product

Good sanitation and clean-up

Incoming ingredient inspections

Monitoring

Physical barriers

Removal of exterior habitat/food sources

Screened windows/vents

Sealed doors and/or windows

Other: \_\_\_\_\_

**Physical Controls, Lures and Repellants:**

Electrocutors

Freezing treatments

Heat treatments

Mechanical or sticky traps

Release of beneficials

Pheromone traps

Ultrasound/light devices

Other: \_\_\_\_\_

**Pest Control Materials – On National List or Nonsynthetic**

Boric acid

Diatomaceous earth

Pyrethrum

Vitamin baits

Other: \_\_\_\_\_



## Handler and Processor Organic System Plan – WSDA Organic Program

### Pest Control Materials – Not on National List

- |                                       |  |
|---------------------------------------|--|
| <input type="checkbox"/> Bait station | <input type="checkbox"/> Crack and crevice spray |
| <input type="checkbox"/> Fogging      | <input type="checkbox"/> Fumigation              |
| <input type="checkbox"/> Other: _____ |  |

### **Pest control materials used in areas where organic ingredients and products are handled, processed or stored must be included on your Input Materials List.**

5. Describe how bait stations are used at your business' facility.
- No bait stations are used.
  - All bait stations are located on the exterior perimeter, outside of areas used for organic handling.
  - Stations are only baited with a nonsynthetic or organically allowed input material.
  - Other - *Describe the type of bait used and where bait stations are located.*
6. Describe how organic products and packaging are protected from contact with pest control materials.
- Not applicable, no pest control materials are used in organic handling or storage areas.
7. Prior to using a synthetic pest control material not on the National List, describe how you will first determine an allowed material is not effective to control the targeted pest(s).
- Not applicable, my business does not plan to use a synthetic input in organic handling or storage areas.





## Handler and Processor Organic System Plan – WSDA Organic Program

Business Name: \_\_\_\_\_ Cert No: \_\_\_\_\_

### Section N: Product Development

205.301, 205.303, 205.307

1. Describe, or attach, your business' internal procedures to ensure a new product is added to your certification prior to marketing, labeling or distribution. *Include details about your internal product development process and at what point in your process a product application packet is submitted to WSDA.*  
 New organic product certification procedures attached.

Follow the instructions in the **Handled Product Application (AGR 2524)** or **Processed Product Application (AGR 2523)** forms to collect and submit the information needed for WSDA Organic Program to review and approved any new organic product for organic certification.

**All product forms are available on the WSDA Organic Program website at:**  
<https://agr.wa.gov/departments/organic/forms-and-applications>

### Labeling

2. Which of the following organic labeling activities is your business involved in? *Check all that apply.*  
 Organic labels display my business' brand.  
 Organic labels identify my business as the final handler, distributor or importer.  
 My business physically packs and applies organic labels.  
 My business designs organic labels.  
 My business coordinates the packing and sale of organic packaged products.  
 None of the above - *Skip to next sub-section – Composition.*
3. Describe, or attach, the procedures used to ensure drafts of all new and revised organic labels are submitted and approved by WSDA Organic Program prior to use. *Include steps for submitting labels to WSDA Organic Program, recording WSDA's review decision, and checking physical labels against approved artwork.*  
 New and revised label approval procedures attached.



## Handler and Processor Organic System Plan – WSDA Organic Program

4. How does your business ensure the correct labeling and packaging is used each production run?
5. Describe how your business' records track which specific labels are used in organic production.
6. Do any labels identify an organic certification agency **other than** WSDA Organic Program below the distributor information?
- Yes
- No
- 6a. If yes, the distributor displayed on the label must be certified by the displayed agency for each specific brand name product.
- How frequently do you request updated certificates to verify the displayed distributor maintains their certification of the finished product?
- Annually
- Prior to each use of the label
- Other: \_\_\_\_\_



## Handler and Processor Organic System Plan – WSDA Organic Program

### Composition

7. Does your business produce or formulate organic processed products?  
 Yes  
 No - *Skip to next section.*
8. Describe, or attach, the procedures that ensure all new and revised formulations are submitted and approved by WSDA Organic Program prior to use by your business:  
 New and revised formulation approval procedures attached.
9. Describe how your recordkeeping system keeps track of the specific ingredients and processing aids used in organic production:
10. Do you use non-organic agricultural ingredients, flavors, or yeast in products labeled “organic”?  
 Yes  
 No
- 10a. If yes, how often do you attempt to source a suitable organic version?  
 Annually  
 Prior to each use of the label  
 Other: \_\_\_\_\_
- 10b. How do you record your attempts to source or trial organic ingredients before using an approved non-organic version?



## Handler and Processor Organic System Plan – WSDA Organic Program

**Business Name:** \_\_\_\_\_ **Cert No:** \_\_\_\_\_

### Section O: Recordkeeping System

**205.103**

Certified operations must maintain detailed records that fully disclose all activities. A certified business' recordkeeping system must include a complete **audit trail** or documentation sufficient to determine the source, transfer of ownership, and transportation of organic products. Records must be maintained regarding the purchasing or acquisition of organic ingredients or products, through handling or processing, and transport or sale.

Records must also include a **unique identifier or link** that connects one record to the next document in the audit trail. Unique identifiers or links may change throughout the audit trail, provided the change is documented and tracked within records.

In addition to **providing traceability**, your recordkeeping system must be sufficient to demonstrate that your business is able to **balance quantities** of organic products sold or distributed with quantities of organic ingredients acquired and handled during a given time period.

- Complete the table below, or attach a diagram, illustrating how your records link together to trace organic handling from **purchasing or acquisition** through **handling or processing** to outbound **shipping or sale**.

*Note: All audit trail records must clearly identify the organic status of the product. Attach additional sheets if necessary.*

Audit trail or recordkeeping diagram attached.

Document Name	Generated Externally	Activity Record Describes	Unique identifier or link to previous and next document in audit trail
	<input type="checkbox"/>		
	<input type="checkbox"/>		
	<input type="checkbox"/>		
	<input type="checkbox"/>		
	<input type="checkbox"/>		
	<input type="checkbox"/>		
	<input type="checkbox"/>		
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	<input type="checkbox"/>		
	<input type="checkbox"/>		
	<input type="checkbox"/>		
	<input type="checkbox"/>		
	<input type="checkbox"/>		

- Attach a sample packet of the records identified in the table to demonstrate a complete audit trail.

Sample packet of audit trail records attached.



## Handler and Processor Organic System Plan – WSDA Organic Program

3. Describe your business' **lot numbering system**, including a key for any codes. *If your lot numbers change as ingredients are processed into finished products, be sure to describe each format of lot number and when they change.*
4. How is the finished product lot number displayed on outgoing shipment records?
- Printed on Invoice or Bill of Lading
  - Included on Packing List or Shipping Manifest
  - Other: \_\_\_\_\_
5. How do shipping, sales or brokerage records identify each product's organic status?
6. Describe your system for tracking **inventory and storage** of organic crops, products, or ingredients.
- Not applicable – My business does not store or arrange storage of organic products. *Skip to next question.*
- 6a. How often do you record (and retain for >5 years) inventory of **incoming** organic products and ingredients?
- Not applicable – all organic handling is seasonal with inventory zeroing out every year.
  - Not applicable – incoming raw is processed immediately upon arrival.
  - Not applicable – no distinction between incoming and outgoing products.
  - Monthly
  - Annually
  - Other: \_\_\_\_\_



## Handler and Processor Organic System Plan – WSDA Organic Program

- 6b. How often do you record (and retain for >5 years) inventory of **outgoing** organic products?
- Not applicable – all organic handling is seasonal with inventory zeroing out every year.
  - Not applicable – finished product is shipped immediately upon packing.
  - Monthly
  - Annually
  - Other: \_\_\_\_\_

A WSDA organic inspector will **audit your business' handling and financial records** during each annual inspection. All records must be made available for review and copy if necessary. Knowledgeable staff involved in completing and maintaining records must also be available during all announced inspections.

7. Are all records maintained at your primary location/facility?

- Yes
- No

- 7a. If no, where else are records kept and what type of records are maintained at that location?

8. Is the primary contact for your business able to access all records pertaining to organic sourcing, handling, distribution, and finances?

- Yes
- No

- 8a. If no, who else is responsible for maintaining and accessing records? *Include the type or names of records that are not readily available to the primary contact associated with your organic certification.*

Read more about USDA organic recordkeeping requirements in WSDA's **Organic Recordkeeping factsheet**.

All organic related factsheets can be found on the Resource page of the WSDA Organic Program website:  
<https://agr.wa.gov/departments/organic/resources#Factsheets>



## Handler and Processor Organic System Plan – WSDA Organic Program

Business Name: \_\_\_\_\_ Cert No: \_\_\_\_\_

### Section P: Quality Assurance and Fraud Prevention

205.201, 205.272

Certified operations are required to **implement monitoring practices and procedures** to evaluate that their business’ organic system plan is effectively implemented. Operations are also responsible for using appropriate and effective means to **prevent organic fraud in the supply chain**. Your business’ fraud prevention plan should reflect the activities, scope, and complexity of your supply chain.

1. Does your business have standard operating procedures (SOPs) for organic handling?
  - Yes, a copy of my business’ organic handling SOPs are attached.
  - No
  
2. How does your business ensure the practices described **in this organic system plan** and any attached SOPs are consistently implemented? *Select all that apply.*
  - Established employee training program includes organic handling topics. Frequency: \_\_\_\_\_
  - Procedures are documented within the activity records so employees attest to specific steps.
  - Procedures require a second employee to verify completed tasks.
  - Records are reviewed to verify accuracy and completeness. Frequency: \_\_\_\_\_
  - Employee observations and evaluations include organic practices. Frequency: \_\_\_\_\_
  - Deviations and corrective actions are documented.
  - Other - *Describe below:*
  
3. Does your business conduct internal audits?
  - Yes
  - No
  - 3a. If yes, describe the scope and frequency of the internal audits.



## Handler and Processor Organic System Plan – WSDA Organic Program

4. Does your business take samples of organic products or ingredients and analyze them for prohibited pesticide residues?
- Yes  
 No
- 4a. If yes, describe your business' internal sampling system. *Include details about how your business determines which products to sample, the frequency samples are pulled, and the screening or analysis performed.*
- 4b. Describe how your business responds when pesticide residues are detected. *Include details about how you determine the source of contamination and whether the product maintains its organic status, who is notified and involved in the investigation, and how this response is documented.*
5. Detail how your business evaluates and approves organic suppliers or other certified organic businesses you may work with? *Include details about how you monitor previously approved suppliers and service providers.*
- Organic supplier approval procedures are attached.





## Handler and Processor Organic System Plan – WSDA Organic Program

6. Prior to harvest or sourcing, what steps are taken? *Select all that apply.*
- Verify the supplier's organic certificate was issued prior to purchase/receiving and includes the specific organic products sourced from them.
  - Verify supplier is currently listed as certified in the [USDA Organic Integrity Database](#).
  - Verify the supplier participates in third party food safety audits (GFSI or other schemes outside of organic certification) and has a passing score that will be provided to my business annually.
  - Verify the supplier can meet my quality and quantity demands.
  - Comparisons of yield estimates to certified acreage.
  - Review supplier business structure and history.
  - Review supplier's organic certification history (suspensions, surrenders, changes in certifier).
  - Supplier agrees to provide fertilizer and/or pesticide input application records.
  - Supplier agrees to meet product specifications for each shipment of product.
  - Supplier agrees to provide timely organic certification updates when changes occur.
  - Supplier agrees to provide product residue sampling results.
  - Supplier agrees to immediately provide written notification of any positive residue results.
  - Supplier agrees to on-site inspection(s) by a representative of my business.
  - Other - *Describe below:*

Your business must maintain records that verify all incoming organic crops, products, and ingredients were certified according to the USDA organic regulations. Receiving and purchasing records must clearly trace back to the organic certificate issued to the supplier or source.

Read more about USDA organic sourcing requirements in WSDA's **Sourcing Organic Products factsheet**.

All organic related factsheets can be found on the Resource page of the WSDA Organic Program website:  
<https://agr.wa.gov/departments/organic/resources#Factsheets>

7. How does your business verify the organic certification of the specific organic ingredients, products, or services you source or receive?

- Obtain organic certificates that connect to the ingredient or product.
- Print or save certification record from USDA Organic Integrity Database.
- Print or save certification record from the supplier's certification agency website.
- Other: \_\_\_\_\_

7a. How often do you complete and record this verification step?

- With each shipment
- Monthly
- Annually
- Quarterly
- Other: \_\_\_\_\_



## Handler and Processor Organic System Plan – WSDA Organic Program

In general, any business involved in the organic supply chain must be certified. There are only narrow exemptions for retail establishments and some handlers of tamper-evident packaged products. WSDA must be able to verify any uncertified operation in your supply chain qualifies for an exemption under section 205.101 of the USDA organic regulations.

Read more about USDA organic certification requirements in WSDA's **Who Must be Certified factsheet**.

All organic related factsheets can be found on the Resource page of the WSDA Organic Program website:  
<https://agr.wa.gov/departments/organic/resources#Factsheets>

8. Do you purchase organic products from a retail establishment?

Yes

No

8a. If yes, describe how the products are packaged and labeled prior to acquisition:

8b. If yes, how do records supplied by the retailer trace the product back to an organic certificate and verify no additional handling (e.g. re-packing, transloading, etc.) took place?

9. Do you purchase or receive organic products from any uncertified business other than an exempt retailer?

Yes

No

9a. If yes, please describe: *This supply chain may be denied or require additional information.*

10. How often do you switch suppliers, add new suppliers, make one-off purchases or do "spot purchasing"?

Daily or weekly\*

Annually

Monthly or quarterly\*

Rarely or never

*\*Frequent changes may result in increased risk of receiving fraudulent products.*



## Handler and Processor Organic System Plan – WSDA Organic Program

**Organic fraud** is defined as the “deceptive representation, sale, or labeling of nonorganic agricultural products or ingredients as organic.” Any person or responsibly connected person that commits organic fraud can face civil penalties outlined in [7 CFR Part 3.91\(b\)\(1\)\(xxxvi\)](#) per violation.

11. Describe your business’ criteria for reporting suspected organic fraud and providing credible evidence to WSDA Organic Program or USDA National Organic Program. *Credible evidence may include: photos, website screen shots, audit trail records, correspondence records, residue sample results, GMO sample results, etc.*

*Select all that apply.*

- My business will report all positive sample results linked to organic products.
- My business will report instances of potential fraudulent activity in my supply chain.
- My business will report instances where the quantity of organic product received from a supplier exceeds their known production capacity.
- My business will report instances where an organic product is being offered for sale below market price without reasonable explanation.
- Other - *Describe below.*

Complaints or potential fraudulent activity involving a certified WSDA organic business should be reported directly to WSDA Organic Program at 360-902-1805 or [organic@agr.wa.gov](mailto:organic@agr.wa.gov).

Complaints or potential fraudulent activity involving an uncertified business or a business certified by a different USDA organic certification agency should be reported to USDA National Organic Program:  
<https://www.ams.usda.gov/services/enforcement/organic/file-complaint>.

Records must be maintained regarding any potential fraud or complaints within your supply chain. These records must be available for review during scheduled inspections.

**Contact the WSDA Organic Program team with any questions about the Organic System Plan or the requirements for certification. We are here to assist you and your business!**