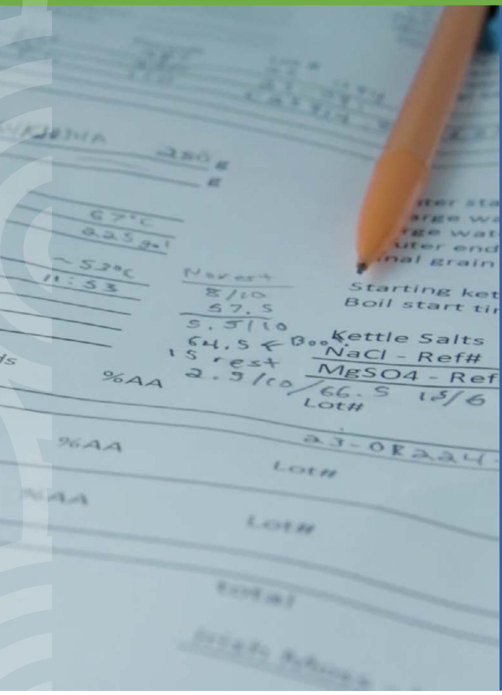
Recordkeeping Requirements for Organic Handlers

Recordkeeping is the backbone of organic certification. It is how a certified handler proves that they maintained organic integrity from the moment ingredients arrived at the door to the moment finished products left. Organic recordkeeping does not require building an entirely new system from scratch. This article grounds the requirements in the actual regulation, explains what they mean in practice, and shows through real-world examples that most of what is required is simply good business recordkeeping with organic designation added.



What You'll Learn

- The purpose of organic recordkeeping and how records are used during inspections.
- What recordkeeping requirements are found in the regulations and what is up to you to decide when it comes to meeting those requirements.
- The difference between your Organic System Plan and day-to-day operational records.
- What information your records need to capture from receiving through final sale.
- What records must be retained, how long to keep them, and how readily they must be available for inspection.
- Your responsibility when working with uncertified suppliers, warehouses, or other uncertified operations.

Organic recordkeeping is how certified handlers demonstrate that products have remained in compliance with organic requirements while they were under their control. Your annual organic inspections will look backward, asking what happened over the past year. Your records provide answers and present evidence that your operation met organic standards during that time. They show, for example, that the ingredients you purchased were organic, that the products you processed followed approved formulas, that cleaning or purging happened between nonorganic and organic runs, and more.

Fortunately, organic recordkeeping is largely just good business recordkeeping. Most of the records required to demonstrate compliance with USDA organic regulations are records that many businesses already need to maintain for other programs such as food safety. These include: what ingredients came in, how much was received, who supplied them, how many units of products were made, and how many units were sold. The difference with organic is that these records must clearly identify organic products, document any critical control points that ensure organic integrity, and create a traceable chain of documents that can verify organic status from receiving through final sale.

"The recordkeeping that organic requires, most of it is records that you want to keep no matter what … The only difference with organic is that they require it, and … you must keep these records."

Mike Dill
Director of Advocacy and Sustainability
Organically Grown Company

Records Organic Certification Adds to Standard Food Tracking Recordkeeping

	Standard Food Tracking	+	Additional Organic Layer
Receiving	• What product arrived • When it arrived • Quantity received • Who supplied it	+	• Organic status of product clearly stated on receiving documentation • Organic certificate of supplier on file • Documentation tracing product to last certified handler (if other than your supplier) • Supplier lot code • Proof of clean transportation vessel or other method of preventing commingling (if needed)
Production	• What was made • Day it was made • Ingredients used • Quantity produced	+	• Organic status of finished product • Lot code for finished product • What ingredients are organic • Ingredient lot codes that trace back to receiving • What time of day the product was made (if needed) • Appropriate use of sanitizers (if needed) • Required cleaning or purging (if needed)
Inventory	• What is in storage (ingredients and finished product) • Quantity on hand	+	• What products are organic • Finished product lot code(s) that tie back to production records
Sales & Shipping	• What is sold • When it is shipped • Quantity shipped • Where it was sent	+	• Whether product is "100 percent organic," "organic," or "made with organic" • Finished product lot code(s) that tie back to inventory and production records • Proof of clean transportation vessel or other method of preventing commingling (if needed)

RECORDKEEPING REQUIREMENTS

While the USDA organic regulations give handlers flexibility in how records are organized and maintained, there are several specific recordkeeping requirements to keep in mind when designing a system for your operation.

1. **All certified organic handlers must maintain records for all organic products,** whether they are sold as "100 percent organic," "organic," or "made with organic."[1] This is true for all certified handlers, whether you process, store, distribute, or fall into some other classification of handling.

2. **Record keeping systems must be "adapted to the particular business."**[2] The USDA organic regulations deliberately avoid prescribing a specific recordkeeping format. A small tea packer and a regional grain mill will have very different recordkeeping systems, and both can be compliant. The key is that your records fit the needs and workflow of your business.

3. **Your records must tell the complete story of what happened to organic products while they were under your control.**[3] They must document activities and transactions from purchase or receipt, through production and storage, to sale or transport. Records must contain enough detail that someone unfamiliar with your operation, such as an inspector visiting for the first time, can readily understand and audit them.

This requirement "from purchase" includes traceability back to the last certified operation that handled the product before it entered your control. In many cases, this is straightforward because the supplier you received the product from is certified. In other cases, the supplier you work with may be exempt from certification, which means additional documentation is needed to maintain a complete chain of records back to the last certified operation that handled the product. You'll need to collect documentation that goes back one, two, three, even potentially more operations without any gaps so that your purchase can be traced back to the last certified operation. Later in this article, we'll go into more detail about recordkeeping requirements when working with uncertified suppliers.

4. **Organic records must identify products by their composition category,** namely "100% organic," "organic," or "made with organic."[4] Abbreviations such as "O" or "MWO" can also be used in appropriate cases. This requirement extends beyond finished product labels and applies to records such as receiving documentation, production batch records, and shipping records. This clear identification ensures that organic products remain distinguishable from nonorganic products throughout the supply chain.

5. **Organic records must be retained for a minimum of five years from the date they are created.**[5] This requirement is based on the creation date of the record, not the end of the calendar year or the date of inspection like some food safety programs.

6. **Your records must provide enough information for an inspector to determine that your handling activities comply with the USDA organic regulations.**[6] A recordkeeping system that is organized but incomplete does not meet this requirement. Individual records are important, but it is the complete system that demonstrates compliance and preserves organic integrity.

WATCH OUT

Some handlers confuse the organic five-year record retention requirement with shorter retention periods used in food safety programs. Make sure to keep all records involved in your organic audit trail for a full five years from when they were created.

7. **A certified operation must have records available for inspection** and copying by authorized representatives of the USDA, the applicable state organic program, and the certifying agent during normal business hours.[7]
   The phrase "normal business hours" is important. Your records must be accessible, organized, and readily available for review. They should not be buried in a filing system that only one employee understands or stored offsite in a way that makes them difficult to retrieve. If an inspector conducts an unannounced inspection, they should be able to review the requested records without significant delay.

8. **You must provide a description of the recordkeeping system you will use to comply with the organic regulations in your Organic System Plan (OSP).**[8] In other words, before you become certified, you commit in writing how records will be created, maintained, and organized. During inspections, the inspector compares that written plan to your actual records. If you change your recordkeeping practices, you must update your OSP to reflect those changes.

OSP DOCUMENTS VS OPERATIONAL RECORDS

That last requirement highlights an important distinction between planning and implementation. Your OSP describes the system you intend to follow, while your operational records demonstrate what *actually happened*.

Your OSP is the governing document for your organic operation. It describes how you will receive, handle, store, process, and ship organic products; what materials you plan to use; and how you will prevent contamination and commingling. When your certifier reviews your OSP, they are evaluating whether your plans and procedures are capable of complying with the organic regulations.

On the other hand, operational records capture activities as they occur. These may include receiving logs, production and batch records, sanitation logs, pest control records, inventory counts, and shipping records. When an inspector reviews your operational records they will see when and how you carried out your procedures.

An organic inspector will review both your OSP and your operational records. The OSP helps them understand how your system is supposed to work. The records allow them to verify that it actually worked that way.

For example, your OSP may state that receiving staff verify supplier organic certificates and record lot numbers for incoming organic ingredients. The inspector will then review your operational records, in this case maybe a sampling of receiving logs, supplier invoices, and organic certificates, to confirm that ingredients identified as organic on finished product labels were in fact organic.

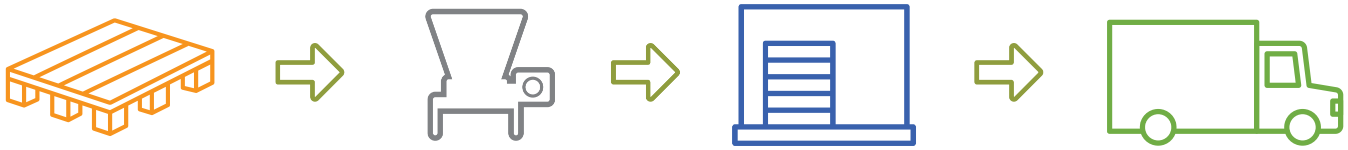
Info called for in the OSP	Related Operational Record*
Pest control methods and materials to be used	**Pest control log showing date, material, location, and applicator**
Receiving procedures for organic ingredients	**Receiving records showing supplier, product, lot number, quantity, and organic verification**
Production procedures and batch controls	**Production records showing ingredient lots used, quantities produced, and finished product lot numbers**

** These are examples and not an exhaustive list of recordkeeping requirements.*

THE PRODUCT LIFECYCLE: CREATING AN AUDIT TRAIL

The regulations require records to span from "the time of purchase or acquisition, through production, to sale or transport."[3] In practice, this means that an inspector must be able to follow an organic product from the moment it enters your operation until it leaves.

Examples of Records Across a Product Lifecycle



Receiving

- Supplier invoice
- Bill of lading (BOL)
- Organic certificate
- Proper transport checks

Production/Handling

- Batch record
- Production record
- Blend sheet
- Work order
- Cleaning logs

Storage/Inventory

- Inventory log
- Inventory reconciliation records
- Lot number tracking

Outgoing/Sales

- Sales invoice
- Bill of lading (BOL)
- Packing slip
- Shipping records identifying product as organic

Ingredient Lot Numbers Link Across (Receiving and Production/Handling)

Finished Product Lot Numbers, Production Dates, Expiration Dates, or Other Code Link Across (Production/Handling through Outgoing/Sales)

At Receiving

The first step in the audit trail is verifying the organic status of incoming products.[3,4,6] Records collectively demonstrate who supplied the product, whether the supplier was certified, what product was received, the organic status of the product and lot code, how much was received, and when it arrived.

This information may be documented across several records, which could include:

- Supplier organic certificates
- Purchase orders or invoices identifying the product as organic
- Bills of lading identifying the product as organic
- Receiving logs documenting quantities, dates, and lot numbers

Together, these records establish the starting point of the organic audit trail within your operation.

During Production and Handling

Production batch records document what happened to products after they were received. These records identify the ingredient lots used, quantities of ingredients incorporated into production, production dates, final product counts, and assign a finished product lot number. Depending on how product flows through your operation, this may be captured by one batch record filled out on a distinct production day or span multiple forms each filled out over days, weeks, or months of processing a single batch of product.

These records serve as the critical internal link in the audit trail. They connect incoming ingredients and their supplier lot numbers to the finished products that ultimately leave your facility.

Depending on what type of handling your operation does, these records could include:

- Pick lists
- Batch records
- Packaging logs
- Production count sheets
- Prep logs
- Mix sheets
- Quality control logs

Inventory Records

Inventory records are required for certified organic operations and must track both ingredients and finished products while they are in storage. These records must include enough detail about product quantities to support inventory reconciliation and mass-balance checks during inspection. Organic products must be clearly identified and distinguished from nonorganic products. This requirement is especially important in mixed-use facilities handling both organic and nonorganic products.

While the USDA organic regulations do not prescribe how often physical inventory counts must be performed, certified operations are required to maintain an inventory system that allows inspectors to evaluate inventory quantities and compare them against other operational records to confirm that those quantities are accurate and consistent throughout the system.

At Sale and Shipment

The final step in the audit trail is verifying the organic status of outgoing organic products. Sales invoices, shipping records, and bills of lading must identify products as organic and include their lot number to connect them back to your inventory and production records.

Notice that organic designations such as "100% organic," "organic," or "made with organic" must appear on audit trail documents, not just on retail product labels.[4] Sales and shipment records complete the chain of documentation and allow an inspector to trace a product from its sale back through inventory, production, and receiving records to the last certified operation that handled it before you.

RECORDKEEPING RESPONSIBILITIES WHEN WORKING WITH UNCERTIFIED OPERATIONS

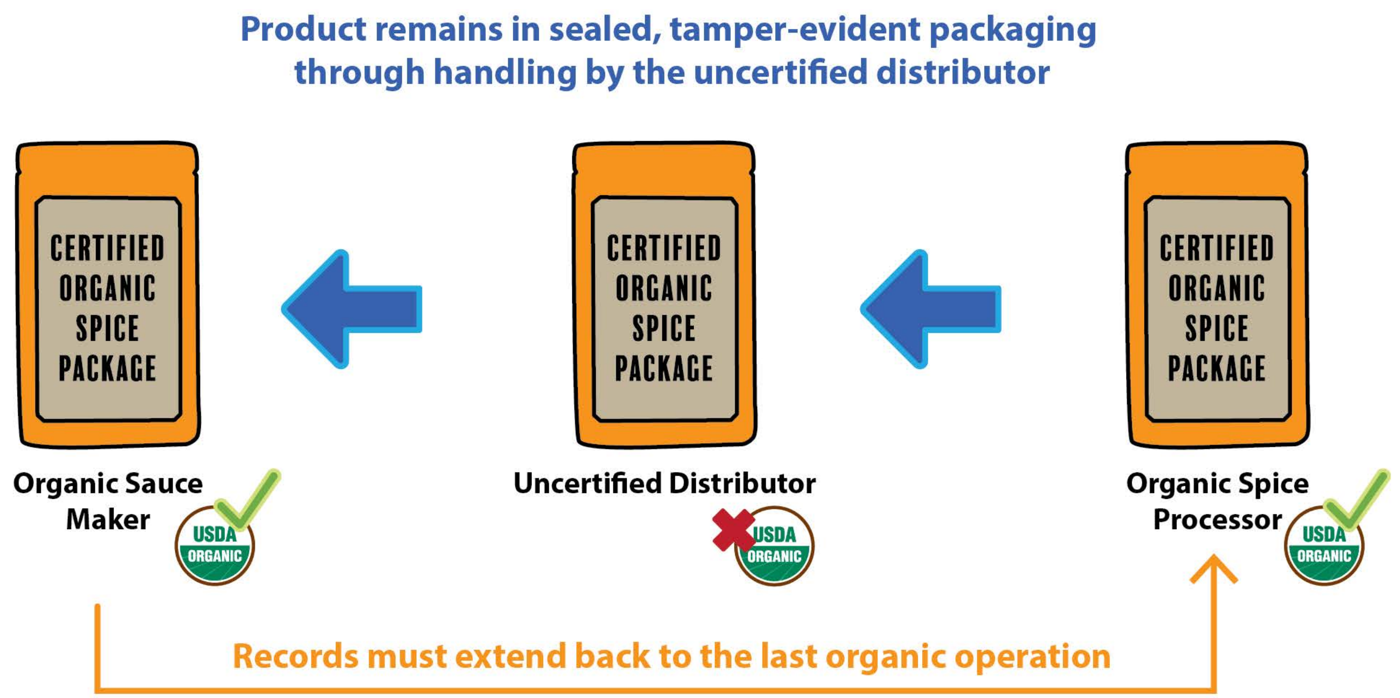
It is a common misconception that if your organic product's supply chain includes an uncertified operation, that there are no recordkeeping obligations related to that step of the product lifecycle. In reality, the opposite is true. Let's look at two examples often found in a product's supply chain: an uncertified ingredient supplier and an uncertified third party logistics company.

Uncertified Supplier

If you purchase an organic ingredient from an uncertified supplier, you are responsible for maintaining the records needed to trace that product back to the last certified operation that handled the product before your operation.[3] If that certified source is two or three operations before your supplier, you would need documentation that links lot codes across those operations to the last certified one. *As the certified operation, it is your responsibility to make sure these records are collected and retained.*

All the records must identify the product, designate it as organic, and include the quantities transferred. Purchase invoices, bills of lading, lot number records, organic certificates, and other audit trail documents may all play a role. It is key that the last certified operation can be identified through the documentation, either directly by name or through traceable lot numbers.[3]

For example, a certified organic sauce maker purchases sealed packages of organic spices from an uncertified distributor. The distributor never opens, repacks, or relabels the spices; it simply purchases them in sealed, tamper-evident packages from an organic spice processor, stores them, and ships them. In this case, the sauce maker must collect more than just the records showing they purchased the spices from the distributor. They must also collect the records showing that the distributor purchased the spices from the organic spice processor. If the documentation cannot identify and connect the spices back to the organic spice processor, the organic status of the spices cannot be fully verified.

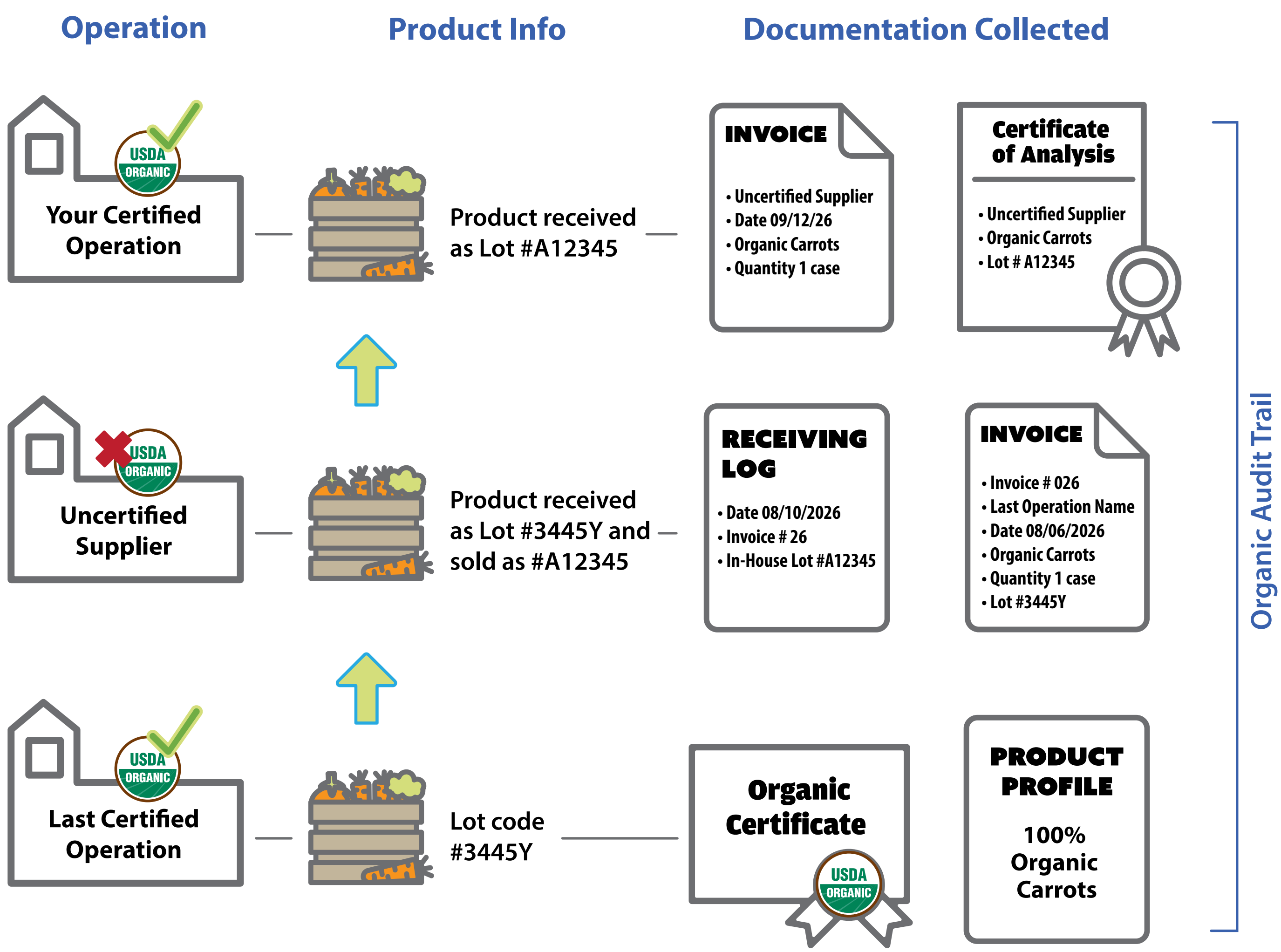


Uncertified Logistics Company

Similarly, if you use an uncertified operation as your third-party logistics (3PL) partner, you are still responsible for ensuring that you collect and maintain the records needed to demonstrate organic compliance. This includes inventory records, sales records, and shipping documentation sufficient to support full traceability through your supply chain. Inventory documentation must include the level of detail described in the Inventory Records section of this article, and all sales and shipment records generated by the 3PL must support accurate identification and tracking of organic products.

For example, an organic coffee company may use an uncertified 3PL provider to warehouse and fulfill all of its orders. In this case, the certified organic coffee company remains responsible for obtaining and retaining compliant inventory records from the 3PL, including documentation that tracks quantities and lot codes held and shipped on its behalf. The company must also ensure that outbound shipping and sales documents clearly identify products as organic and maintain lot code traceability through to the customer. The coffee company will need to be able to identify what lot code of product was shipped out to fulfill a particular order. If the 3PL is generating the pick lists, shipping records, or other fulfillment documentation that notes those lot numbers, the coffee company must collect and retain them so they are available for inspection and audit review.

Tracing Records Through Uncertified Suppliers



Even when one or more suppliers are exempt from certification, the audit trail must still connect the product back to the last certified operation. Certified handlers are responsible for maintaining the records needed to verify that connection.

BUILD ON THE RECORDS YOU ALREADY KEEP

One of the most effective ways to develop an organic recordkeeping system is to start with the records you already maintain and identify how they can be adapted to meet organic requirements. Often, the path to compliance is not creating new records, but modifying existing ones so they capture the additional information needed to demonstrate organic integrity.

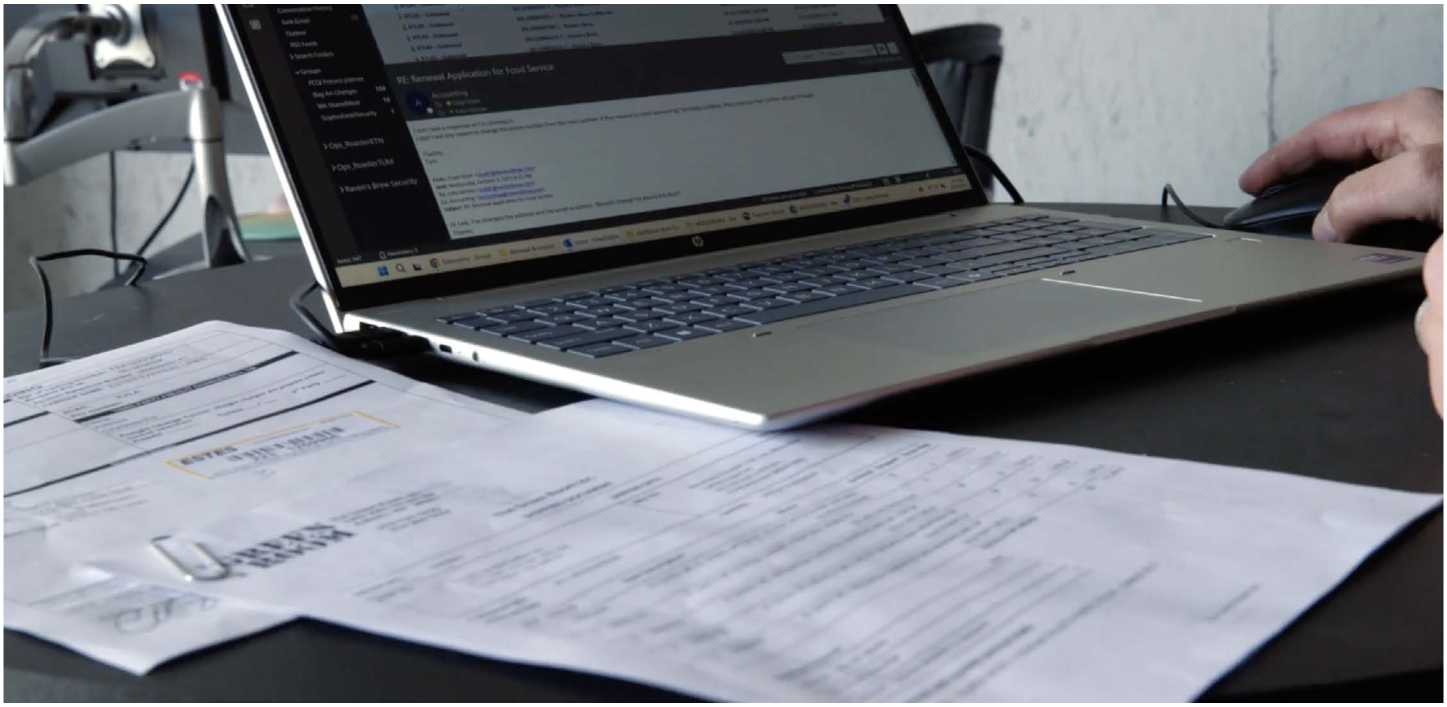
For example, a food manufacturer may already generate production batch records to meet food safety requirements. Rather than completely redesigning this form, they incorporate a few modifications that capture the additional information needed to build an organic audit trail. They update their current batch record to identify the finished product and ingredients as organic, add spaces to record ingredient lot numbers, and insert a field for recording the finished product lot number that will link the batch to inventory and shipping records.

"Structuring your process and system … without overly inflating that production process into too much complexity or too many checks and balances … is going to be really critical for success."

Johanna Phillips
Director of Business Development and Regulatory Affairs
Strengthening Organic Systems

CONCLUSION

Organic recordkeeping is ultimately about being able to demonstrate compliance. During an inspection, your records become the evidence that organic products were sourced from approved suppliers, handled according to your Organic System Plan, protected from commingling and contamination, and accurately represented as organic when sold. The specific forms and records used will vary from operation to operation, which is why it is important to understand the underlying recordkeeping requirements and approach any single format or template as a starting point. With that knowledge in hand, you are ready to build and maintain a recordkeeping system that demonstrates compliance and creates a complete, understandable, and auditable record of what happened to organic products while they were under your control.



ACTION ITEMS

- Audit your existing records for organic gaps. What are you already tracking that just needs an organic layer added?
- Make sure every record identifies products as organic, not just your labels.
- Confirm your records span from receiving all the way through to final sale.
- Assign and track lot numbers at every stage: receiving, production, and shipping.
- If you use uncertified suppliers, collect the records that trace back to the last certified operation.
- If you use a 3PL, make sure you're collecting and keeping their fulfillment records.
- Describe your recordkeeping system in your OSP and keep that description current.
- Set a reminder to retain all organic records for a full five years from creation date.

SOURCES CITED

1. USDA National Organic Program, 7 CFR §205.103(a).
2. USDA National Organic Program, 7 CFR §205.103(b)(1).
3. USDA National Organic Program, 7 CFR §205.103(b)(2).
4. USDA National Organic Program, 7 CFR §205.103(b)(3).
5. USDA National Organic Program, 7 CFR §205.103(b)(4).
6. USDA National Organic Program, 7 CFR §205.103(b)(5).
7. USDA National Organic Program, 7 CFR §205.103(c).
8. USDA National Organic Program, 7 CFR §205.201(a)(4).

United States Department of Agriculture
Agricultural Marketing Service
National Organic Program