Organic Recordkeeping Requirements

Recordkeeping is a critical aspect of any business. Organized and complete records are also an important part of your organic certification, and help show compliance from the sourcing of seed or ingredients to final marketing.

USDA organic regulations require certified farms and facilities to use a recordkeeping system that is adapted to their business and verifies compliance with the USDA organic regulations. Records must detail the operation’s activities and transactions and must be easily understood and audited by an inspector. Records pertaining to organic production and handling must be kept for five years. 7CFR §205.103

One Step Forward, One Step Back
Certified operations have the flexibility to create a recordkeeping system adapted to their business. Regardless of how simple or complex your system is, it must be sufficient to demonstrate your compliance with organic regulations AND must be able to accurately trace organic products one step forward to the buyer and one step back to the source of the ingredient or field where the crop was harvested.

Document Your Practices
During an inspection, your records must be available for review. Records must be maintained for each activity involving an organic crop or product. The inspector will also use records to evaluate if your operation had enough land, inputs, and production or handling capacity to account for the crops or products that were distributed with an organic claim.

If your farm or facility produces both certified organic and non-certified crops or products, records about your non-certified practices must also be available at your inspection.

Link Activities and Records
Your records must be able to link one step forward to the next activity and one step back to the last activity. Include unique identifiers to accurately track your products and link activities within your records. Dates, quantities, consistent product names, field numbers, animal tags, lot numbers or a combination of these items will ensure your records contain the necessary links and traceability.
Crop Production Records

Below are examples of common records that may be helpful to verify compliance. Additional records may be requested by your inspector. A record should exist for each activity involving an organic crop. Your records must also link back to the last activity and forward to the next activity.

**Prepare your Organic Field**
Records may include:
- Seed invoices, packages, labels
- Organic certificates
- Attempts to source organic
- Use of untreated seed or compliant seed coating
- Non-GMO verification

**Seed & Transplant**
Records may include:
- 36 months of material applications
- Previous land use declaration
- Organic certificate if certified
- Lease agreements/contracts
- Maps or aerial images
- Maps/records from other agencies

**Apply Materials**
Records may include:
- Material applications
- Invoices or receipts for materials
- Receipts for custom applications
- Ingredient lists for inputs not listed with WSDA or OMRI
- Compost production records
- Farm consultant recommendations

**Harvest**
Records may include:
- Yield/count records
- Shipping/delivery receipts
- Custom harvest records
- Buffer harvest/diversion records
- Equipment cleaning logs

**Market**
Records may include:
- Direct market/wholesale records
- Sales invoices and receipts
- Farmers market sales receipts
- CSA share reports
- Income summaries
- Pool closings

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Handling/Processing Records

Below are examples of common records that may be helpful to verify compliance. Additional records may be requested by your inspector. A record should exist for each activity involving an organic product. Your records must also link back to the last activity and forward to the next activity.

Receive Products or Ingredients
Records may include:
- Product specification sheets/ingredient inspection forms
- Full ingredient disclosure
- Non-GMO verification: nonorganic ingredients/processing aids
- Attempts to source organic
- Recipes/product formulations
- Product testing/QC reports
- Production logs/packaging reports

Process Products
Records may include:
- Organic supplier certificates
- Ingredient labels/compliance affidavits from manufacturers
- Field/Bin tickets
- Clean truck affidavit/cleaning logs
- Invoices/purchase orders/bills of lading/scale tickets
- Contracts
- Product specification sheets

Clean Facilities or Store Products
Records may include:
- Standard operating procedures
- Staff training and instructions
- Cleaning/sanitation records
- Preventative practices and application of pest materials
- Inventories of ingredients and finished products

Ship or Market Products
Records may include:
- Pallet/tote/scale tickets
- Certificates of analysis
- Purchase orders and invoices
- Shipping logs and bills of lading
- Export/transaction certificates
- Sales/income reports
Livestock Production Records

Below are examples of common records that may be helpful to verify compliance. Additional records may be requested by your inspector. In addition to the records for your crop or pasture, your livestock farm must maintain records on animals. Livestock production records must link back to the last activity and forward to the next activity.

When is a record not required?

In general, all activities involving an organic product should include a record that verifies your practices. However, if an activity does not impact organic integrity, or does not connect activities within your system, a unique record may not be necessary for that activity. For example, a cleanout record specific to equipment that is steam cleaned and dedicated to organic products may not be needed. Consider the risks that exist at your farm or facility to help determine if compliance can be verified without the generation of a specific record.

Additional Resources

WSDA Organic Resources for New Operations
https://agr.wa.gov/departments/organic/apply-for-certification/resources-for-new-applicants

National Organic Program Recordkeeping Instruction 2602

ATTRA Documentation Forms for Organic Crop and Livestock Producers