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| --- | --- | --- | --- |
| **Operation Name:** |       | **Date:** |        |

► Complete this form if you manufacture, process, label, or physically handle organic products; broker, trade, or resell organic products; or contract with another certified operation to process and package organic products with your brand or label (private label owner/marketer).

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|  **NOP §205.105, §205.273, and §205.300-311** require that an operation intending to sell, label, or represent agricultural products as 100% Organic, Organic, or Made with Organic must develop an Organic System Plan (OSP) that includes a description of all products, formulations, ingredients, and labels seeking certification to ensure compliance. Organic ingredients may only be imported by certified operations and must be accompanied by an NOP Import Certificate.  |

3.1 GENERAL INFORMATION

Describe specific handling activities included by this Organic System Plan (OSP) (i.e., juice production, nut hulling, cooling, cereal manufacturing, animal slaughter, etc.):

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**3.2 ORGANIC PRODUCTS AND INGREDIENTS**

1. Attach a **Master Product List (MPL-01)** that lists all organic products you produce, or that are produced for you.

[ ]  Master Product List is attached.

1. Attach a **Master Ingredient List (MIL-03)** including all organic and non-organic ingredients / processing aids and the suppliers of each if your services include formulating or processing multi-ingredient products, **OR** if you purchase, or supply ingredients as part of your service. *Private label brand owners / Marketers who do not source, or physically handle ingredients are not required to submit those ingredients for review.*

 [ ]  Master Ingredient List is attached. [ ]  N/A, no ingredients are sourced, only finished products.

1. For ingredients listed in the **Master Ingredient List (MIL-03)**, does your company source these ingredients and materials?

[ ]  Yes [ ]  No [ ]  N/A, no ingredients sourced.

If no, indicate the source(s) of the ingredients or materials:

1. Attach a **Product Formulation Sheet Form (PFS-02)** for each multi-ingredient product. *Private label brand owners/Marketers who do not control formulations are not required to submit them for review but should instead provide a spec sheet or ingredient statement from the co-packer.*

[ ]  Product Formulation Sheet is attached. [ ]  N/A, single ingredient or finished products only. [ ]  No products at this time.

1. Do you own the formulations for the products? [ ]  Yes [ ]  No [ ]  Some
2. If no or some, indicate who owns or manages the formulations you do not own:
*Note, you must submit any formulation updates or changes to OTCO for review and approval prior to making the product with a formulation other than what is approved in your OSP.*
3. How do you verify that all supplier/ingredient organic certificates are current for all ingredient/products?

[ ]  Maintain valid certificates onsite, updated annually.

[ ]  Maintained by a certified organic co-packer*.*

[ ]  Other (Explain):

1. How do you verify that only compliant ingredients are used?

[ ]  Submit ingredients to OTCO for review and approval prior to use.

[ ]  Maintained by certified organic co-packer*.*

[ ]  Other (Explain):

1. Does your operation purchase organic agricultural ingredients/products through uncertified suppliers/brokers?

[ ]  No

[ ]  Yes, Submit an Uncertified Handler Affidavit (UHA) for each uncertified supplier.

1. Does your company utilize co-packers or co-manufacturers to produce branded products on your behalf?

[ ]  No.

[ ]  Yes, list all co-packers on the MPL and provide an organic certificate listing your branded products.

1. How do you verify that all co-packers’ organic certificates are current for all organic products being co-packed?

[ ]  N/A, no products are being co-packed.

[ ]  Maintain onsite, valid certificates listing specific branded products which are updated annually.

[ ]  Other (Explain):

1. For finished products labeled “organic” that contain non-organic agricultural ingredients as defined by §205.606, or non-organic non-agriculturalingredients with annotations requiring organic sourcing pursuant to §205.605, complete a **Commercial Availability** **Form** for each ingredient.

[ ]  Commercial Availability Form(s) attached [ ]  Form H11 attached for non-organic flavors used

[ ]  N/A, no ingredients requiring commercial availability are being used.

* 1. **LABELING**

Organic labeling guidelines are available on OTCO’s website. All labels should be submitted to OTCO for review *prior to printing*.

1. What types of products are you labeling? [ ]  Retail [ ]  Non-retail/bulk
	1. If yes for Non-retail/bulk: Do all labels identify the product as organic and include a lot number or other identifier in compliance with **§205.307?** [ ]  Yes [ ]  No (explain)
2. How do you verify that only compliant **labels** are used for organic products?

[ ]  N/A: no labels used. Explain:

[ ]  Submit to OTCO for review and approval prior to printing.

[ ]  Other (Explain):

1. Do you package any products for private label / marketer customers? [ ]  Yes [ ] No

If Yes, is the Brand Owner certified organic?

 **[ ]**  Yes. The Brand Owner’s current organic certificate is attached.

 [ ]  No. A **Private Label Agreement Form (PLA)** is attached.

1. Attach all labels with application.

**[ ]**  All labels in use are attached. **[ ]**  Labels will be submitted for review *prior to printing*.

* 1. **INTERNATIONAL LABELING AND COMPLIANCE**

Export labeling guides and Equivalency Arrangement requirements are available on our website. IMPORTANT: All labels must be submitted to OTCO for review prior to printing. OTCO will NOT be responsible for any costs associated with the reprinting of labels that an operation printed prior to review and that were subsequently found to be noncompliant.

1. Does your operation import or export organic ingredients or products from other countries, or otherwise require Canadian Equivalency?

 [ ]  Yes [ ]  No. End here.

1. From which of the following countries does your operation **import** organic ingredients or products?

[ ]  Canada [ ]  Japan [ ]  European Union [ ]  India [ ]  Other (Identify):

[ ]  Mexico [ ]  South Korea [ ]  Switzerland [ ]  N/A, no import

* 1. How does your operation ensure that the appropriate import documentation is collected for all products from the countries selected above?

[ ]  NOP Import Certificate for each shipment is maintained on-site.

[ ]  Documentation is maintained by a certified organic co-packer.

1. To which of the following countries does your operation **export** organic ingredients or products?

 [ ]  Canada [ ]  Japan [ ]  European Union [ ]  India [ ]  Other (Identify):

 [ ]  Mexico [ ]  South Korea [ ]  Switzerland [ ]  N/A, export and do not require equivalency.

 [ ]  N/A, no export but Canadian Equivalency is required to support my US, domestic sales.

* 1. How does your operation verify that only compliant labels are used for products exported to the countries selected above?

[ ]  Labels are submitted to OTCO for review and approval *prior to printing.*

[ ]  Other (Explain)

* 1. How does your operation ensure that the appropriate **export documentation** accompanies products sent to the countries selected above?

[ ]  Documentation for each shipment is maintained on-site.

[ ]  Other (Explain):

* 1. How does your operation ensure that the relevant equivalency arrangements are met for products sent to the countries selected above?

[ ]  Equivalency arrangements are submitted to OTCO for review and approval *prior to exporting.*

[ ]  Other (Explain):