



GUIDANCE ON IMPLEMENTING AN AUDIT TRAIL

The audit trail permits the producer and outside auditor to trace a certified product from seed to sale or birth to butcher. It is a cornerstone of an organic producer's guarantee to the consumer, and it can protect you from liability for someone else's errors. Having a good record keeping system in place, audit trail included, will reduce the length and cost of your annual inspection. It will also reduce the time spent handling and reviewing your file.

Developing these records and maintaining them over the years is an integral part of organic management and a requirement for certification. Many organic operators find that the records they use for organic production gives them a much better understanding of their operation and thus makes them a better and more productive manager.

Using the guidance that follows, create and maintain the records that apply to your operation. TCO Cert has created several forms that you may wish to use as part of your audit trail (e.g., Field Management Summary, Buffer strip record, Adjoining land use affidavit, etc.) Contact your Chapter Administrator or Certification Coordinator with any questions you may have.

Field Records

- Develop a detailed sketch **field map** with all fields' boundaries, acreage amounts, and identification numbers clearly labeled. Each distinct field or pasture should be numbered or labeled. The boundaries and numbers should remain consistent from year to year. Field maps should also identify all adjoining land uses (as conventional, organic, industrial, etc.), buffers (crop strips, trees, field roads, hedges, etc.) and other features of importance (waterways, buildings, fence lines, etc.). Be sure to show all fields under your management on field maps, including all conventional or transitional fields. If necessary, also maintain a map that shows an overview of all fields in relation to one another.
- Document three years of **field histories** on the *Field Management Summary*. Include additional years if necessary to show a rotation of longer duration. Field histories should list field numbers, acreage amounts, the crop grown (including cover crops and plowdowns), and any inputs applied to the field – including dates and rates of applications. Please feel free to use more than one line per field. Field numbers should match those used on field maps. Information must clearly correspond to the appropriate year. Be sure to include all fields you manage, including conventional and transitional fields that will eventually be requested for organic certification. For any land that has been under your management for less than three years, a *Prior Land Use Affidavit (PLUA)* will be required.
- Organic crops must be protected from contamination from adjoining land. Producers have two options to do this. The first is to maintain a sufficient buffer as per CAN/CGSB 32.310-2015 par 5.2.2, which is either 8 m/26 ft 3 inches wide (or in some cases more) or the maintenance of a permanent hedgerow or barrier or other adequate physical barrier. If the buffer is cropped, it must be managed organically, but the harvest must be considered non-organic. A **buffer strip record** must show the disposition of the crop as non-organic. The second method to ensure contamination of organic crops from adjoining fields does not occur is to obtain an **Adjoining Land Use Affidavit (ALUA)**. This is a statement from the owner of the adjoining non-organic land attesting that prohibited materials have not been used on the neighboring land, and it is agreed that prohibited material will not be used within 25 feet of the certified producer's organic field. If an ALUA is obtained, then buffers in the organic field will not be required. This form must be signed annually.

- **Harvest/production records** indicate harvest dates, estimated yields, and the storage unit or sale destination (whichever is applicable) of all crops. Each field or unit should be listed separately. Harvest records may be included in field histories or kept as a separate document.
- **A field activity log** can vary greatly depending on the type of operation you are managing. Logs should include all field and farm activities with dates and descriptions of plowings, soil preparation, plantings, cultivations, applications of fertilizers, foliar feedings, pesticide applications, harvests and amounts harvested, general observations on crops, etc. Spacious calendars or daily planners work for some producers, while other may find notebooks placed at key locations such as in each tractor or at the dinner table more accessible. Whatever is used and wherever it is placed, it is essential that this recordkeeping tool be used. Your field activity log will help you complete the other required audit trail documents.

Input Documentation

- **Input records** are used to verify a product's compliance with the Standards. The acquisition and use of all products used on your farm operation must be documented. Keep all labels, MSDS, receipts, Transaction Certificates, supplier statements, or other appropriate records for all inputs used. Input records include receipts/invoices/labels for seeds, feed, fertilizers, beneficial insects, pest control products, soil mix ingredients, inoculants, feed supplements, livestock medications, etc., as well as statements verifying the compliance of the input. The labels or receipts should provide the supplier's name and contact information, and a complete ingredient listing. Seed records should list the variety, developer, treatments, and so forth. A guaranteed analysis or OMRI certificate is not sufficient documentation for compliance verification, as TCO Cert must independently verify the eligibility of an input based on the product's *ingredients*.

Before using a product, it must be approved by TCO Cert. Input records can be submitted as review documentation. You can also keep a log of this information on TCO Cert's *Farm Input Record*.

- Non-organic seed is only allowed in the case that organic seed is not commercially available (available in an adequate quantity, quality, and variety). Most certification programs allow the use of non-organic seed, provided that attempts have been made to obtain organic versions first. Anytime non-organic seed is used, documentation must be maintained verifying at least two attempts made to procure organic seed. Keep an **Organic seed search/purchase record** to document these attempts. As well, a statement from the supplier of the non-organic seed verifying that the seed was untreated must be maintained in your files. In the case that the seed has been treated or inoculated with any substance be sure you have written documentation from TCO Cert that the treatment has been approved before you procure the seed.
- Genetically Modified Organisms are not allowed for use in organic production. If a crop is available in GMO varieties, documentation must be provided verifying the non-GMO status of the seed (or other input) used. **Non-GMO affidavits** must be signed by the suppliers of the seed/product.
- If manure is composted on your farm for use on organic crops, **compost production records** must be maintained in order to verify that manure has been adequately converted to compost. These records document the temperature, duration of decomposition and, if applicable, turning. If records are not

maintained to verify the manure has been transformed into compost, then dates and rates of material applications must be documented to verify compliance with CAN/CGSB 32.310-2015 par 5.5.2.

- All **monitoring records** should be kept as part of the audit trail. Monitoring records include soil tests, tissue tests, water tests, and other quality tests. Certain monitoring records are required to verify the need for inputs (soil test when using micronutrients), or to comply with the specific standards. Please be aware that the COR requires all operators to follow the laws of the land in their respective region, e.g., requirements for pest control, irrigation and fresh produce wash water.

Equipment, Storage, and Transport Documentation

- If any harvest, handling, production, and/or transport equipment is not dedicated to organic production (i.e., is used for buffer zone, transitional, and/or conventional crops), you must document the cleaning of the equipment prior to its use on organic product. **Farm Equipment Clean Out Record** should indicate, at minimum: the date, type of equipment cleaned, method of cleaning, field or lot number prior to which the equipment was cleaned, and the signature of the responsible person.
- The transport of organic product is a critical area in protecting the integrity of organic products. If transport is not dedicated organic, you must maintain **Off Farm Transportation Cleaning Record**, or utilize the clean truck portion of the TCO Cert Bill of Lading to document the cleanliness of transport prior to loading organic crop. Please be aware of the information required on certain transport documents in the COR standards, CAN/CGSB 32.310-2015 par 8.4.2 (a. through d).
- A system must be used to document the storage of crops on the farm. **Storage inventory records** must be maintained and should include at minimum: storage unit identification, source (field), crop lot number, amount and date of incoming product, the disposition or destination of the crop, amount and date of outgoing product, and current balance of product (crop). All storage bins, cribs, etc. should have an identification (ID) number, letter, or name that can be used in storage records. If many different crops are being stored in bins during the course of a season, a **Bin register** should be used. The bin register should list the storage IDs at the top as well as the operation's name and the bin's capacity. This list register can be left at the bin on a clipboard so that information can be added as product enters or exits the bin. In addition to storage unit IDs, if organic and non-organic crops are stored at the same site, storage units must be clearly identified as either organic or conventional (such as with magnetic signs or a painted "O" or "C").
- If storage facilities are not dedicated organic, clean-outs must be implemented prior to storing organic commodities in order to avoid contamination of organic product from non-organic products or prohibited materials. These clean-outs should be documented on a **storage clean-out log** that indicates the date, storage unit ID, method of cleaning, and signature or initials of the person responsible for the cleaning.

Lot Number System

- All organic products must be fully traceable back to their origin. A **lot numbering system** must be developed to meet this requirement. Lot numbers are assigned at the farm, are used on your field or storage records, sales records, and outgoing documents to maintain the tracking of your crop after

sale. Processors and handlers are required to maintain an audit trail of each individual farmer's incoming load and need these farmer-assigned lot numbers to identify each delivery. Having your delivery identified in a clear manner protects your product from being confused with another of lesser quality.

A lot number of only one number can be very confusing down the line and should be avoided. Instead, the lot number should clearly identify the year of production, a personal identifier, the last location of the crop (sold directly from a field or sold from a storage bin), the commodity, and the load number. The storage and field records should identify the field or fields from which the crops originated, and the shipments lot number should be included when noting an outgoing load on the storage or field records. The lot number should be used on all weigh tickets, bills of lading (BOLs), invoices, and Transaction Certificates. Here is an example of a lot number that includes this information.

07	JD	5	C	2
Year of production	Your initials	Bin #5	Corn	Load 2

Whatever lot number system you choose to use must be referenced in your records and remain consistent for each sale.

Sale and Transportation Records

- **Sale and transport records** could be receipts, BOLs, scale tickets, and/or Transaction Certificates. Sales records should include the date of transaction, lot number, your name or farm name, and the type of crops sold. Please be aware of the requirements in COR standards, CAN/CGSB 32.310-2015 par 8.4.2 (a through d). Be sure to distinguish between organic products and conventional products on the receipt (i.e., do not omit “organic” on the receipt of an organic product). The receipt should also include the amount for which the crop sold. You are responsible for keeping sales records on all crops grown in parallel production (i.e., the same crop grown both organically and conventionally or transitionally). The Verification Officer or file reviewer may need to see your sales records for conventional and transitional crops, as well as the organic crop.
- All operations certified by TCO Cert are required to keep a record of any complaints that are received concerning certified products or processes. This means that whenever an operation learns of a complaint regarding a product, activity, or process certified by TCO Cert, and the complaint relates to compliance with a certification standard, operations must maintain a record of it. The **Complaint Log Form** can be used for tracking complaints. The use of this *Log* is not required if the same information concerning complaints is recorded by some other method. The log should be kept with the other audit trail records and must be provided whenever TCO Cert or one of the accreditors requests to see it. Verification Officers will check to see that this log is a part of the audit trail records.

Additional Records for Livestock

- **Livestock origin records** must be maintained if the animals were brought onto the operation. Purchase records and an organic certificate or Transaction Certificate verify the organic status of the animals. Animals born on the operation can be verified by birth records, which are often included in the health records.

- Individual, herd, or flock **health records** must be established for all livestock. An index card or page in an animal's notebook with corresponding ID tag is a sufficient place to record all treatments and events. These records should include dates and doses for all vaccines, medications and homeopathics administered to the animals, all reproductive information, and general comments such as weaning dates. These records must be maintained, however small or large the herd.

Poultry operations should maintain flock records with corresponding flock number, information, comments, treatments, etc.

- Organic livestock must be fed certified organic feed. **Feeding records** document the sources of all feed and feed supplements and the dates and amounts fed to livestock to verify compliance with this requirement. In addition to the feed record, **feed source documentation** such as an organic certificate, Transaction Certificate, or supplier statement must be kept on hand to verify the organic status of the product. Source documentation for bedding should be maintained, as well.

Unless animals are restricted from accessing buffer areas, obtain **Adjoining Land Use Affidavits** to ensure that animals in pastures or other fields do not come into contact with prohibited substances applied to neighboring land.

- **Sales and transport records** could be receipts, BOLs, scale tickets, and/or Transaction Certificates. Sales records should also include the date of transaction, animal ID numbers, your name or farm name, and the type of livestock sold. Be sure to distinguish between organic and conventional livestock on the documents. The receipt should also include the amount for which the animals are sold.
- If meat is sold as organic, **slaughter records** must be maintained. These records must show that slaughter occurred at a certified-organic facility and should include the animal or flock ID along with the live weight of the animals and dressed weight of the meat.
- **Dairy and egg production records** will be required if this type of production is occurring. These records should include animal or flock IDs, production dates and quantities, mortalities, as well as **equipment cleaning records** (e.g., a dairy equipment cleaning log).
- Keep all labels, receipts, supplier statements, or other type of **input records** for all products used in livestock production. Common inputs used in livestock production include feed supplements such as salt and mineral, homeopathic medications, and dairy sanitizers.

The above-described audit trail components are not necessarily the only documents you will need to keep, and some may not be necessary for your type of operation. You may have to develop other records necessary to properly document your organic operation.

TCO Cert recommends that you organize all audit trail documents in an easily accessible location. Some records may need to be submitted as part of your application, but all must be available for verification at the time of your inspection. Failure to have these records on hand can result in a delay or even denial of your certification.