



GUIDE TO PREPARE FOR SEED CLEANER INSPECTIONS

This document serves as a pre-inspection guide that certified organic producers can refer to for the inspection of the custom seed cleaning service provider being used that does not have an Attestation of Compliance to the COR.

The inspection will be conducted under the application of the TCO Cert operator as part of the annual inspection. This guide lists topics that will be addressed at the time of inspection and information that will need to be provided to the Verification Officer for review at the time of inspection. It also refers to the records and documents to be reviewed at the time of inspection.

As the owner of the organic product, it is the responsibility of the TCO Cert organic certified operator to ensure that your organic product is protected from contamination and commingling while being handled by the contractual service provider.

Questions to ask prior to the seed cleaner inspection - this information should be forwarded to the appropriate TCO Cert Certification Coordinator and/or chapter administrator.

1.	Does the custom seed cleaner maintain a current “Attestation of Compliance” to the COR? If yes, a copy of the current Attestation and Addendum documents need to be available at the time of your annual inspection. If no, does the seed cleaner operator agree to an inspection of the facility to be conducted under the application of the TCO Cert certified organic producer? NOTE: It is the responsibility of the producer to contact the seed cleaner to arrange for the inspection and to provide them with pre-inspection guidance.
2.	Has the seed cleaner already been inspected by a TCO Cert Verification Officer this year?
3.	If the seed cleaning operation does not agree to be inspected, would the plant operator be willing to sign a “Seed Cleaner Affidavit” verifying that the plant was cleaned prior to cleaning the seed?
	NOTE: Organic seed cleaned in a facility that does not have Attestation of Compliance or has not been inspected by a TCO Cert Verification Officer will not be eligible to be sold with an organic claim.

Information that will be confirmed by the Verification Officer at the time of inspection:

ACTIVITIES OF THE SEED CLEANER	
1.	Organic and non-organic product(s) cleaned and handled at the seed cleaning facility.
2.	Activities carried out at the facility.
3.	If the facility is not a “single-line” operation, explain and demonstrate how organic and non-organic runs are separated by place or time.
4.	Does the custom service provider perform any packaging or labelling as part of the custom service provided to organic operators?

HANDLING OF ORGANIC PRODUCTS	
5. a.	Showing how the segregating of organic and non-organic products are received, stored and shipped to prevent commingling and contamination.
b.	Show how the organic products are identified.
6.	Equipment used in handling the organic products.
7. a.	Procedures of how equipment is cleaned prior to the handling of organic products.
b.	Records that are kept that record these activities.
c.	Brand names of any cleaning and sanitizing products used inside the facility
8.	If seed treatments (ie. Inoculant) are added to the organic product, need complete brand names of the products used.
PEST MANAGEMENT	
9. a.	Is pest management controlled in-house or is it contracted out?
b.	The records kept that record these activities.
c.	Brand names of all pest control products that are used inside the facility.
10.	The measures in place to prevent the pest control products or other materials from contaminating the organic products.
STORAGE	
11.	Type of storage units.
12.	Storage and disposition of any products (ie. Screenings) or discarded materials from the cleaning.
STAFF	
13.	Training of employees in organic protocols and records of the training.
TRANSPORTATION	
14.	Responsible person/people for incoming and outgoing product transportation.
15. a.	The measures in place to ensure the integrity of the product is maintained during transport.
b.	Clean transportation documentation maintained.
TRACKING METHODS	
16.	The lot number, identification or tracing procedure of the organic product used and preserved throughout the entire cleaning process.
17.	Record keeping that allows for an in-out balance of organic products.
18.	Identifying records kept for organic seed cleaning and handling in the facility.
DOCUMENTS/RECORDS	
ACTIVITIES OF THE SEED CLEANER	Flow Chart* Facility Map*
HANDLING OF ORGANIC PRODUCTS	Equipment clean-out logs* Copies of labels for seed treatments, if applicable* Production records
PEST MANAGEMENT	Pest management records
STORAGE	Bin storage records*
TRANSPORTATION	Bills of Lading and Transport unit inspection/clean-out affidavit* (if seed cleaner is responsible for the transportation)
TRACKING METHODS	Scale tickets* Audit control register

*Records and documents that need to be available at the time of inspection.