



# Organic Food Federation

## Explanatory Note 320

*These notes are intended to help applicants comply with the USDA National Organic Program standards. They are not exhaustive and are for explanation only. In cases of doubt the current version of the NOP Regulatory Text must be consulted.*

### EXPORTING TO THE USA?

To export organic products to the United States your production facilities, the products that you export and the products that you purchase for the purpose of exporting must be certified as compliant with the United States Department of Agriculture National Organic Program (NOP) Standard.

### Preparing your Organic Systems Plan (OSP) §205.201

1. This is an important document which must be drawn up and agreed with us before you can even be inspected (*unless we agree that your existing documentation of organic procedures already complies with NOP requirements and is already acceptable..... you must not assume that it is!*)
2. Compliance with your OSP is one of the measures by which you will be assessed at future inspections and it must not be modified in any way without announcing your intention to do so and obtaining prior approval from us to implement any changes.
3. As a minimum, your OSP must include:-
  - a. Details of your production and/or processing practices in the production and/or manufacture or handling of the products and details of the organic products that are being produced, processed or handled.
  - b. Details of the substances to be used, these must include what they are, where they come from, who grew or made them, who certified them and the quantities used in your operation. This applies to the seeds, plants or stock that you start with or the basic raw materials that you purchase and use in product recipes.
  - c. Details of the monitoring system in use to ensure that your OSP is being fully implemented.
  - d. Details of the records kept that verify compliance with your OSP and the NOP Standard. §205.103
  - e. You must identify the non-organic ingredients of agricultural and non agricultural origin including synthetic and non-synthetic substances which are included in the composition of your manufactured products and verify that they are not prohibited substances. This applies to processing aids as well as additives (Refer to the NOP National List) §205.601, §205.602, §205.603, §205.605 §205.606
  - f. You need to detail the methods by which you ensure that organic materials are not contaminated with prohibited substances or permitted to be in contact with non-organic agricultural materials. §205.272 (*In the US they use the very specific term “co-mingling” when organic and non-organic materials are in contact during storage*)

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- g. You must identify the materials and methods, where appropriate, to be used for: - soil fertility, soil improvement, stock treatment, pest control and hygiene. You need to specify the procedures that are conducted for the prevention of contact of organic materials or products with any of these substances.
  - h. If any additional measures have to be taken we will require that they are included in your OSP before you are inspected for the first time.
4. If you need to change your OSP, for example a formulation change, a procedural change or even a temporary change, your proposal must be submitted to us and agreed by us in writing before it can take effect. Failure to do this could result in a non compliance resulting in sanctions.

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