



## Organic System Plan - IMPORTS & EXPORTS

NOFA-NY Certified Organic, LLC

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### 1. IMPORTS (includes direct imports or through uncertified distributors/brokers)

Not Applicable

▶ Be sure to review the country of origin's trade and/or equivalency arrangement with the USDA NOP and collect and organize necessary records for each shipment. (Example: Most equivalency arrangements require USDA NOP import certificate).

#### NOFA-NY Import Policies

- If any organic products/ingredients are imported (directly or through uncertified suppliers/brokers), complete audit trail records must be maintained back to the last certified entity demonstrating clear chain of custody. Along with the organic supplier certificate, this could include purchase records, shipping documents, transaction certificates, receiving records, bills of lading, labels, organic certificate of the source farm(s), etc. as applicable.
    - Records should list lot numbers, volume, name of last certified operation, etc. so product can be traced through the supply chain.
    - In addition, records confirming organic integrity was maintained with respect to transport, fumigation and/or irradiation should be maintained such as phytosanitary certificates.
- A. Provide details for products and/or ingredients imported from outside of the United States or imported product obtained from uncertified supplier:
- See Master Supplier List (must contain information below).

Products / Ingredients Imported	Country Imported from:	Supplier:	Organic Certificate Type: (NOP, EU, COR, Swiss, etc.)

- B. Describe procedures for verifying how organic integrity of imported products is maintained in the supply chain beyond obtaining organic certificate: (For example, how do you verify the validity of import documentation, organic certificates and certifiers; How do you verify no fumigation with prohibited substances and/or irradiation; etc.)

- C. Is a broker/distributor being used?  Yes  No

1. If yes, indicate the broker/distributor status:  Certified Organic  Uncertified, see below

NOFA-NY certified operations may only source from uncertified handlers who provide full traceability back to the last certified operation for each shipment. The following may be needed for complete traceability:

- For each delivery, uncertified handlers should provide a complete, current organic certificate for the last certified operation.
- Documents must be obtained linking directly back to the last certified operation, providing purchase / delivery / transfer to the uncertified handler.

- Purchase invoices, Bill Of Lading (BOL), and other audit trail records must designate products as organic and include a description of the product and amount transferred.
- The last certified operation must be listed on invoices and/or lot numbers applied by the last certified operation must match lot numbers on uncertified handler audit trail records.
- All certified suppliers must be approved by NOFA-NY as part of the certified operation's Organic System Plan (OSP). If an uncertified supplier has a new certified source, that must be added to the OSP/Master List.

D. Has compliance with import requirements been verified?  Yes  No

2. EXPORTS

Not Applicable

NOFA-NY will review your operation for compliance with the requirements of equivalence arrangements between the USDA National Organic Program (NOP) and various foreign governmental bodies. Certified operations can be reviewed to equivalencies with Canada, the EU, Japan, Korea and Switzerland.

A. GENERAL INFORMATION:

1. Which foreign markets are you planning to export to, directly or indirectly (through brokers / traders, etc.)?

Canada  The EU  Japan  Korea  Switzerland

other:

2. What products or crops do you plan to export directly or indirectly to these foreign markets?

All  Limited, please describe:

3. Do you have systems in place to separate ingredients and finished products that meet different organic standards, to avoid commingling?

NA, all products meet identical standards.

Yes, systems in place. Please describe:

B. LABELING AND PRODUCT IDENTIFICATION

► All labels used for exported products must meet the labeling requirements of the importing country. The US, the EU, Canada, Japan, Korea and Switzerland have different labeling requirements. Please review requirements and submit all labels for approval.

1. Do you intend to use any additional labels for exported products, other than the labels that have been approved by NOFA-NY?

No  Yes, attach all additional labels

C. SUPPLIER VERIFICATION

► If you are exporting products produced or manufactured by other operations, you will need to demonstrate that the entire supply chain is compliant or equivalent to the destination market.

1. Do you have documentation that all suppliers (including raw produce, ingredients, and processed products) meet the critical variances described in section D for the applicable standard?

► For products exported to destination markets with no critical variances listed in section D, additional documentation is not required.

Yes:

Certificates or affidavits on file for any suppliers not certified by NOFA-NY.

Self-attestation made for Canadian Equivalency, documents maintained on-site.

NA, I do not plan to export products produced or manufactured by others.

NA, I plan to export products to markets with no critical variances.

D. CRITICAL VARIANCES BETWEEN US NOP AND EXPORT MARKETS

1. Do you use sodium (Chilean) nitrate to grow crops?

NA

RESTRICTION: Prohibited in Canada

No, I do not use sodium nitrate

Yes, I use sodium nitrate for ALL crops

Yes, I use sodium nitrate for some crops but not others. Please describe:

2. Do you handle crops that are grown with hydroponic or aeroponic methods?  NA  
 RESTRICTION: Prohibited in Canada  
 No, hydroponic/aeroponic methods are not used  
 Yes, hydroponic/aeroponic methods are used for ALL crops  
 Yes, hydroponic/aeroponic methods are used for some crops but not others. Please describe:

3. Do all organic non-ruminant livestock and livestock products meet the livestock stocking rates set forth in the Canadian Standards?  NA  
 RESTRICTION: Required for Canada  
 No, non-ruminant livestock do not meet the stocking rates set forth in the Canadian Standard  
 Yes, all non-ruminant livestock / products meet the stocking rates  
 Some non-ruminant livestock / products meet the stocking rates, some do not. Please describe:

4. Do you export wine to the EU or Switzerland, or produce wine that may be exported to the EU or Switzerland?  
 RESTRICTION: Required for EU and Switzerland.  
 No, I do not produce wine.  
 Yes, I make wine. ► Contact the office for additional requirements.

5. Do you plan to export raw or unprocessed products?  
 RESTRICTION: Prohibited in Korea  
 No, I do not plan to export raw or unprocessed products  
 Yes, all of the products I plan to export are raw or unprocessed  
 Yes, some products I plan to export are raw or unprocessed. Please describe:

**3. AUDIT TRAIL**

A. Indicate all records being kept regarding importing/exporting:

Invoices/Purchase Orders (identifying specific product(s), lot numbers, quantities and supply chain entities)	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Shipping Documents (booking sheets/bills of lading with lot number, volume, handling instructions, the name of last certified organic operation, etc.)	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Organic Certificates	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Weight Tickets, Receipts and/or Tags	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Clean Truck / Container Affidavits / Transport Unit Inspection Forms	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Receiving Records (showing organic status, quantity of organic product received, and source of product)	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certificates of Analysis / Product Specification Sheets	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
NOP Import Certificates / Certificates of Inspection	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
TraceNet Certificates (applies to products certified in India to the USDA organic standards)	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Attestation Statements (applies to products certified to the Canadian organic standards)	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Phytosanitary Certificates	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Customs Forms	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Product Inventory / Storage Records	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Transaction Certificates	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Export Declaration Forms	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Fumigation Verification	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If fumigated, is product sold as non-organic?	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Other: <input type="text"/>	<input type="checkbox"/> NA	<input type="checkbox"/> Yes	<input type="checkbox"/> No