

B. ORGANIC PLAN (310 CLAUSE 3)

CANADIAN ORGANIC STANDARDS*

4. ORGANIC PLAN

4.1 “The operator shall prepare an organic plan outlining the details of transition, production, preparation and management practices.”

4.2 “The organic plan shall be updated annually to address changes to the plan or management system, problems encountered in executing the plan, and measures taken to overcome such problems.”

COG'S GUIDE TO THE STANDARDS

4.1 The purpose of record-keeping on organic farms is to track everything that takes place or is used on the organic operation. It sounds like a huge job but most farms already keep very good records to monitor their productivity and to track income and expenses for tax purposes. By adding documentation about the products that are used and a daily log of farm activities, they have the basics for a solid recordkeeping program.

The first organic plan is essentially the initial application for organic certification. For farms, the organic plan includes information about field histories, crops (including pasture and forage) to be grown, the size of the operation, detailed maps, location, water sources and use, neighbouring activities, seeds, planting stock, soil amendments and other inputs used to produce the organic crops, as well as production practices and intended markets. The program for crop protection, post-harvest handling and nutrient management program (including a soil-building plan) need to be described. For specialty crops, the certifier will want to know the details of the practices and inputs being used to bring the organic crop to market.

For preparation, the plan will include (i) details of the composition of all organic products, (ii) use of additives or processing aids, and (iii) the measures in place to ensure the integrity of the organic products is maintained through to packaging, labelling and final sales.

For livestock operations, records on the origin of livestock as well as their inventory identification numbers, health records and sales, must be maintained. Once you have organized your records, it is easy to use the same system every year and to track inventory from year to year.

4.2 The annual update to the organic plan is completed at the beginning of the second year and every following year. Changes are recorded and new strategies to deal with problems are identified.

*Organic production systems: general principles and management standards. CAN/CGSB-32.310-2020. Canadian General Standards Board. Dec. 2020. www.publications.gc.ca/site/eng/9.854643/publication.html.

**See the Q&As from the Standards Interpretation Committee at organicfederation.ca/final-questions-and-answers-canadian-organic-standards.

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4.3 “The organic plan shall include a description of the internal record-keeping system, with documents sufficient to meet traceability requirements as specified in 4.4.2 and other record-keeping requirements.”

4.4.1 “The operator shall maintain records and relevant supporting documentation such as visual aids (for example, maps, work-flow charts) concerning inputs and details of their use, production, preparation and transport of organic crops, livestock and products. The operator shall maintain the organic integrity of products and shall fully record and disclose all activities and transactions in sufficient detail to be easily understood and sufficient to demonstrate compliance with this standard.”

4.4.2 “Records shall make it possible to trace

- a) the origin, nature and quantity of organic products that have been delivered to the production unit or operation;
- b) the nature, quantity and consignees of products that have left the production unit;
- c) any other information for the purposes of verification, such as the origin, nature and quantity of inputs, ingredients, additives and manufacturing aids delivered to the production unit, and the composition of processed products;
- d) activities or processes that demonstrate compliance with this standard.”

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4.3 A record-keeping system must be developed (and described in the organic plan) which enables an inspector to be able to track a product from final sale back to the field and seed which produced it– this is traceability.

4.4.2 This describes in more detail the specific records necessary to ensure traceability (also called the “audit trail”), such as:

- a) receipts, invoices and expense journals for all materials or products used in production or preparation.
- b) invoices, copies of receipts, bills of lading, sales journals and financial (tax) records. In particular, sales records must ensure the traceability of the product, including such information as batch or lot numbers, production dates, label SKU, livestock tags and slaughterhouse documentation, or any other invention that will allow the purchaser (and further consumers in the supply chain) of a product to identify the origin of the product.

The records identified in a) and b) also facilitate an “input/output” verification; that is, to ensure that an operation has not produced more “organic” product than is possible from the organic ingredients it purchased. Records should allow an inspector to compare the volume of crop produced to the volume of crop sold. For example, a farmer might show that enough land was planted in carrots to grow 500 kg of carrots. If the sales records show that 1000 kg of carrots were sold, the farmer will need to provide a credible explanation.

- c) These records allow the certifying body to evaluate a product to ensure that it has been produced according to these standards and allow the inspector to carry out a mass balance exercise using one or more organic ingredients

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4.4.3 “An identification system shall be implemented to distinguish organic and non-organic crops, livestock (for example, general appearance, colour, variety and types) and products.”

4.4.4 “The operator shall design and implement a risk management plan to prevent GE contamination which may include strategies such as physical barriers, border rows, delayed planting, testing of seeds, isolation distances and equipment and storage sanitation protocols.”

4.4.5 “Records shall be maintained for at least five years beyond their creation.”

4.4.6 “If a pest control substance that is not listed in CAN/CGSB-32.311 is used under any mandatory government program, the operator shall monitor and document its use.”

“NOTE: In the event of emergency pest outbreak, Canadian operators are required to notify their certification body immediately of any change that may affect organic product certification.”

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purchased to make an organic product.

4.4.3 In the case of a split operation where a farm has both organic and non-organic production (of crops, livestock or products, even production for home use), an identification system must be in place to ensure that the separation between organic and non-organic is maintained. For example, ear tags can separate livestock. Exterior permanent numbers on grain storage bins can ensure that the organic crop is kept separate. When a genetically engineered crop of the same crop type is stored on the farm, there is an additional requirement of a sign identifying the bin as organic; this is critical to ensure that the two crops are not commingled (see Clause 8.1.5.g).

Manufactured organic products must be distinguishable from non-organic products. The most common way to achieve this is through the use of product labels. Bulk organic products must be labelled in such a way that they cannot be confused with non-organic products.

4.4.4 A GE risk management plan requires the maintenance of records that demonstrate the success or failure of the plan. If seed or crop testing is done, records of the tests must be kept. If the farmer has contacted neighbours to learn the planting date of an adjacent GE crop, a note should be written up in the daily log. If delayed planting is used, recording the two planting dates is required. Equipment and storage sanitation protocols need to be noted in the daily log.

Vulnerable crops, such as corn, will retain their organic status if a certifier determines that the farm has implemented well-timed and well-designed risk mitigation strategies.

4.4.6 If a government-mandated spray program takes place on an organic operation, the affected area will require a 36-month re-transition period.

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