

Companion Guide
for the
Apiary Organic Compliance Plan



Quality Assurance International

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Thank you for choosing QAI as your certification agency.

Welcome. This booklet is being provided to assist you to successfully complete the QAI certification application process and to understand the requirements of the National Organic Program (NOP). Here we provide QAI’s guidelines for how you can demonstrate compliance to the NOP. This Companion Guide is for your reference and we hope you find it helpful.

Using this Booklet

You will notice that each numbered section in this booklet corresponds to the same numbered question on the QAI Apiary Organic Compliance Plan. If you need clarification regarding a question asked, you can quickly find the answer within this booklet.

Following is an example on how to use this booklet.

This is a question from the Compliance Plan:

A) Apiary Map

1. Has an accurate map of the apiary and forage zone been attached? <i>NOP 205.201(a)(6)</i>	YES <input type="checkbox"/> NO <input type="checkbox"/>
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Here is the reference from the Guidance Booklet:

A. Apiary Map	
1. Farm & Facilities <i>205.201(a)(6)</i>	QAI requires clients to supply an accurate map of the apiary operation requesting certification and the surrounding forage zone. Make sure to include all organic and non-organic cropland, wild areas, water sources, hives, honey extraction facilities and other major structures. Indicate the type of activities that take place in the forage zone, including sources of potential contamination.

Application Check List

Before you send in your completed application package, please review the following checklist and remember to include these items:

- ✓ Application for Organic Certification completed and signed.
- ✓ Apiary Organic Compliance Plan completed.
- ✓ Facility Maps – Include all major equipment in this diagram.
- ✓ Flow Chart – All functions of the apiary operation must be represented.
- ✓ Individual Forage Zone Profile (IFZP) – A complete IFZP must be submitted for each different location on which colonies are maintained. Please include a Forage Area Map for all significant land uses within a 4 mile radius of the hives.
- ✓ Colony Health Profile (CHP) – Please complete for each colony you maintain.
- ✓ Individual Product Profile (IPP) – A complete IPP must be submitted for each organic product included on the Organic Certificate. Please include product labels with your IPPs.
- ✓ **If any crops grown on your operation** are intended to be sold as an organic commodity please complete a Producer Organic Compliance Plan.

If you continue to have questions, please do not hesitate to contact our corporate office.

This page corresponds directly with the QAI Application and/or Limited Application for Organic Certification.

Certification Issue

Guidance

General Information

205.401 (b)

If your operation controls the marketing and/or sale of products seeking certification you are allowed application as a Primary Applicant Certified Entity (C.E.).

If your location contributes to the overall certification of a C.E. operation, you may be asked to complete the Limited Application for Organic Certification. The C.E. must agree to take liability for your organic compliance. Likewise, your organic certification is limited to those activities carried out for the C.E.

The ownership and control of the facility is important in discerning whether the location is considered by QAI as an extra location or an additional participant under the certified entity.

A. Certification History

1. Current Certification

205.401(c)

If another certification agent certified your company organic, please provide all details of that application and resulting certification to QAI for review.

2. Previous Certification

205.401(c)

In compliance with the regulation, all previous applications for certification and the results of those applications must be fully disclosed to QAI.

B. Description of the Operation Seeking Certification

Briefly provide a list of all the types of organic production, organic products, and brands that will be represented under this certification. Supplying existing documents such as your price list or inventory schedules may provide this information.

C. International Marketing

International access may require involvement in other QAI programs. By providing your market information, QAI can advise you on options regarding compliance for international access.

The following pages correspond directly with the QAI Apiary Organic Compliance Plan.

Certification Issue

Guidance

A. Facility Map

1. Apiary Map *205.201(a)(6)*

QAI requires clients to supply an accurate map of the apiary operation requesting certification and the surrounding forage zone(s). Make sure to include all organic and non-organic cropland, wild areas, water sources, hives, honey extraction facility and other major structures. Indicate the type of activities that take place in the forage zone, including sources of potential contamination.

B. Flow Chart

1. Production steps *205.201(a)(1)*

As part of the description of practices and procedures performed by certified operations, clients need to supply a flow chart showing each of the steps in the production of organic products through to the sale of finished goods, including: source of hive components and bees, management activities, extraction, processing, packaging, and distribution of apiculture products.

C. Organic Compliance Plan Overview

205.201

Under the USDA National Organic Program (NOP), any producer or handler who intends to sell, label or otherwise represent goods with any organic claim must develop an organic plan that is approved by an accredited certifying agent, in this case, QAI. The content of this organic plan is mandated by the NOP and must include the information described below. Any changes you make to your organic compliance plan need to be documented and approved by QAI prior to implementation.

1. Practices & Procedures *205.201(a)(1)*

First, you will need to provide a general overview of the activities and processes your operation conducts. Make sure to include the expected volume and frequency of honey production runs and the number, species and location of colonies to be certified. Indicate all management activities such as supplemental feeding, hive movement, and health care practices.

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|---|--|
| <p>2. Individual Forage Zone Profile (IFZP), Colony Health Profile (CHP), Individual Product Profile (IPP)
<i>205.201(a)(2)</i></p> | <p>When completed for each location where bee colonies are maintained, the IFZP will satisfy the requirement that sufficient organically managed forage, or forage that meets the NOP criteria for wild crops is provided.</p> <p>The CHP will indicate the species and number of hives maintained, and sources of any supplemental feeds, health care materials, or other inputs used to manage the colony.</p> <p>When completed for each product, the Individual Product Profiles, or IPPs, fulfill requirements for product composition and ingredient compliance.</p> |
| <p>3. System review
<i>205.201(a)(3)</i></p> | <p>A description of how, and how often, you will review your own apiculture production and handling system to ensure that the organic plan is being implemented effectively. Describe all quality monitoring practices such as brood inspection, honey analysis, forage evaluation and other regular quality tests, and include how often they are performed.</p> |
| <p>4. Documents
<i>205.201(a)(4)</i></p> | <p>A record keeping system that records all organic production activities and verifies your compliance with the NOP is also necessary.</p> |
| <p>5. Organic integrity protection
<i>205.201(a)(5)</i></p> | <p>The final part of the compliance plan summary is a general description of the management practices and barriers in place to prevent the commingling of organic and non-organic commodities and prevent the contact of your organic commodities with prohibited materials at each step in your control.</p> |

D. Origin of Bees

- | | |
|---|---|
| <p>1. Bee Source
<i>NOSB 2-5/240(a)</i></p> | <p>Documents should be maintained that indicate the source of bees and when they were introduced to the hives or moved to forage areas that comply with the NOP requirements, such as invoices and activity logs. Under recommendations from the NOSB, replacement bees from non-organic sources should be introduced at least 60 days before the expected start of a honey flow.</p> |
|---|---|

- 2. Continuous Organic Management
NOSB 205.240(j)(7) If organically managed hives are moved, you need to maintain documentation that all forage zones comply with the NOP requirements.
- 3. Identity Preservation
NOSB 205.240(c) Your records need to show which colony was maintained on which forage zone at any given time. These records should be sufficient to indicate which specific colony was the source of any given lot of honey or other apiculture products.

E. Bee Forage and Feeding

- 1. Forage Requirements
NOSB 205.240(d)&(e) You should maintain current certificates for all organically managed land on which bees will forage. In addition, documentation should show that surrounding forage areas, up to a radius of 4 miles from the colony location, comply with NOP wild crop requirements. Specifically, forage areas must be verified to have no prohibited substances applied for a period of 3 years preceding the start of honey flow. In addition, possible sources of contamination such as golf courses, landfills, and industrial facilities should not be located within 4 miles of the colony.
- 2. Supplemental Feed
NOP 205.238 (a)(2) Documentation should be kept showing the source of any supplemental feed, including certificates for organic honey, sugar syrup, and/or pollen substitutes, as well as other supplements that are permitted under NOP section 205.603. It is recommended by the NOSB that you not provide organic sugar syrup less than 30 days prior to the harvest of honey to be sold, labeled or represented as organic.

F. Apiary Health Care Practice Standard

- 1. Species Selection and Location
NOSB 205.240(i)(1) A large part of organic management is preventative practices, including the selection of bee stocks, hive densities, and colony locations with regard to suitability for site-specific conditions and resistance to prevalent diseases and parasites.
- 2. Adequate Nutrition
NOSB 205.240(i)(3) Providing sufficient forage as well as honey and pollen reserves is essential to maintaining colony health. Sufficient supplies should be left in hives to allow the colony to survive the dormancy period without requiring supplemental feeding, which should be documented in activity logs.

3. Hive Sanitation
NOSB 205.240(i)(4)

Practices that prevent the spread of diseases and parasites, such as ensuring that foundation wax is free of contamination, and destruction of equipment and bees found to be contaminated with diseases and pests, are essential to colony health maintenance. Receiving records or invoices for foundation wax and activity logs may be used to document these practices.
4. Health Management Practices
NOSB 205.240(i)(6)

Other methods, such as modifications to equipment to prevent entry of bee disease vectors or pests, regular examination of brood chambers, and similar practices should be documented in activity logs.
5. Therapeutic Substances
NOSB 205.240(i)(8)

When pests or diseases are observed, or are known to be present in the region, synthetic substances that are allowed for such use on the National List (NOP section 205.603), or non-synthetic substances that are not prohibited in NOP section 205.604 may be used.
6. Diseased Colonies and Smokers
NOSB 205.240(j)(1), (5),(6)

Producers are expected to take measures to restore the health of a diseased or infected colony, even if this results in the loss of its organic status. If a colony must be treated with a prohibited substance, you should immediately notify QAI of the treatment and affected colony.

Materials used in bee smokers should not be of synthetic origin or treated with synthetic substances. Substances burned in bee smokers should also not include manure or other non-synthetic materials that are prohibited for use in organic production in NOP section 205.604.

G. Hive Construction Materials

1. Untreated Lumber

Hives may only be treated with substances approved for wood treatment on the National List. It is recommended that hive bodies be constructed of wood or other natural materials and painted with non-lead based paint. If plastic foundation is used, it should be dipped in organic beeswax and mounted on a wooden frame.

H. Record Keeping (Audit Trail)

1. Contract handlers

205.103(a)

205.101(b)(1)

Those producers that use the services of contract warehouses, co-packers and storage companies or other handling facilities must make sure that those facilities are capable of maintaining the organic integrity of the goods they handle. Any such facility should either be certified independently or inspected under your certification.

An exception to this rule exists when your products are sealed in containers or if no packaging or repacking occurs at the contracted facility. In these instances, it is allowable to have the facility operator complete a "Warehouse Affidavit" which verifies that the handler is knowledgeable about the practices required to maintain the integrity of the organic goods and that appropriate record keeping practices are in place.

2. Records, specific

205.103(b)(2)(4)

The record keeping requirements mandated in the NOP are general in nature and broad in scope. QAI recognizes that great diversity exists among organic producers, and that a wide variety of record keeping systems may be compliant with the NOP regulations. While a record keeping system is required by the NOP, QAI is responsible for determining which specific information, documentation or records are necessary to evaluate compliance with the regulations of the NOP.

Some system for ensuring audit trail clarity, such as linking lot numbers from one document to the next, is necessary. A traceable lot numbering system ensures that organic product can be linked to the origin. Apiculture products sold or otherwise transferred with organic representation must be accompanied by documentation that clearly identifies them as organic. Bills of lading and invoices, for example, must clearly identify the organic honey included.

In many instances, sample copies of relevant records may be collected at the inspection or during the review process to allow QAI to verify compliance with the NOP. All documentation and records relating to organic production, and parallel conventional production as it relates to your organic operation, must be maintained in an organized and retrievable format and available for review during each inspection.

Additionally these records must be available for review by representatives of USDA or your State organic program.

Producers of organic honey are required to maintain records of all activities and transactions involving organic inputs and products. Your records system must be sufficient to ensure that all organic honey and other apiculture products can be tracked through to the final sale. In the case of purchased supplemental feed, current organic certificates from a USDA Accredited certifying agent for each organic input used or purchased will need to be on file and available for review by QAI and the inspector.

Depending on the nature, size and scope of your operation, other necessary records may include: receiving logs, weight certificates, grading logs, processing records, invoices and other documents relating to the production, handling and sale of goods. QAI, based on the information provided by the inspector, will assess the ability of your records to adequately track all organic goods sold.

3. Five year rule
205.103(b)(3)

All records, logs, and documents relating to the production, handling and sale of organic milk must be kept on file for no less than five years after their creation.

I. Honey Handling

1. Ingredients
205.301(f)(7)

This question is intended to verify that the same ingredient is not included in both organic and conventional forms in the same product. One couldn't use both organic sage and conventional sage in organic sage honey, for example.

2. Commingling & Contamination
205.272(a)

QAI recognizes that the methods used to protect the integrity of organic goods are quite varied and may be tailored to fit only a single operation. Still, maintaining the organic integrity of ingredients and products handled at your facility may be divided into two broad categories:

- The practices followed to prevent the mixing or commingling of organic ingredients and products with their non-organic counterparts (if you have a mixed operation)
- The practices followed to prevent the contamination of organic ingredients and products with prohibited substances, again at every step in the process.

Your procedures need to include a written description of these management practices.

Commingling In operations handling organic and non-organic goods, there are several opportunities for accidental commingling to occur. QAI requires that receiving records be kept at your facility that include the organic status of the incoming goods and their incoming identification (lot codes).

Mixed operations require more systems to ensure that organic honey is not commingled with conventional honey.

Contamination Take special care when using prohibited sanitation and pest management materials in or around the facility, as well as when using prohibited boiler additives that may contaminate organic goods through contact with hot water or steam. In cases where State or Federal health and safety regulations dictate that prohibited substances remain on food contact surfaces, operators, in most cases, need to purge the system before packaging organic goods.

Water When organic ingredients, products, or food contact surfaces are exposed to water, that water must be potable, meeting the Safe Drinking Water Act. You will need verification of this point for review at the inspection. When municipalities provide your water, QAI assumes the water quality is compliant, while operations using wells or other private water sources must have analyses on file showing compliance when water is used in organic production. Levels of residual chlorine at the point of last contact with organic goods may not exceed 4 parts per million, as annotated in the National List.

Cleaners & Sanitizers In the case of cleaners and sanitizers, operators need to make sure that all residues are removed prior to introducing organic ingredients into the flow. Depending on the processes involved, this may include sweeping, vacuuming, washing, rinsing, or purging the equipment prior to the introduction of organic goods. Sanitizer residue or pH tests or other similar means of verification are required to verify on an appropriate routine schedule that food contact surfaces are free from contaminants.

The inspector will review the sanitation standard operating procedures (SSOP's) and other records or logs documenting that all appropriate steps have been taken.

3. Transport
205.272(a)

When organic goods are stored in bulk tanks or other containers while in transport, care must be taken to protect the integrity of the organic goods.

Procedures must be in place and followed to prevent:

- 1) the commingling or mixing of organic ingredients and products with their non-organic counterparts and
- 2) the contamination of organic ingredients and products with prohibited substances, especially the residues of cleaners, sanitizers and pest control materials.

The inspector may verify that cleaning records, trucker affidavits and/or other documentation are required for vehicles to verify that the bulk containers were adequately cleaned, and that remaining non-organic goods were not present when the organic goods were loaded.

J. Handling Facility Pest Management

1. Structural pest control
205.271(a)(b)

A structural pest management program must be in place that emphasizes sanitation and management of other environmental factors to lessen the pest and rodent pressure on the facility. A basic description of the preventative measures implemented needs to be provided for inspection and review by QAI. Any lures or repellents used must be consistent with the National List. Traps should be numbered for easy reference on activity logs.

2. Listed materials
205.271(c)

If, after sanitation and other preventative measures are attempted, pests are still a problem in the facility, pest control substances consistent with the National List may be used, *provided* that there are clear records of the attempts and negative results of the non-chemical measures. The inspector and QAI will review these records each year to verify compliance with the NOP.

3. Non-Listed materials
205.271(d)(e)

If other methods are ineffective and those supporting records are adequate, the client may propose a limited list of substances not included on the National List to be used in the facility, provided that QAI agrees to those substances, application methods, and the methods used to prevent contact with organic goods.

4. Regulatory override
205.271(f)
- In cases where local, State or Federal regulations dictate the use of prohibited pest control substances, clients need to provide written verification from the appropriate regulatory agency testifying to that fact. Even in these instances, measures must be in place to prevent contact by prohibited substances with organic goods or packaging.
5. Pest control records
205.201(a)
205.271
- Part of the requirement of the organic system plan is the provision for records relative to pest control activities conducted on site. A current, accurate map needs to be available for inspection that includes the locations of all bait stations, traps, and monitoring devices. All stations and traps should be numbered and so indicated on the map for easy reference on logs that record pest or rodent activity.

The use of any pest control substances such as sprays, fogs, fumigants, and rodent bait needs to be recorded on pest control or incident logs, with reference to the date, material and specific location where each material was used.

Very often, but not always, contracted Pest Control Operators will record their activities while on site. It is important to convey in writing to the contracted company, as well as to the technician directly, that organic goods are handled at your facility and that special precautions may be required to maintain the organic integrity of those goods. Moreover, it is important to ensure that the records left by the technician include the necessary information for the inspector and QAI to verify compliance with the applicable sections of the NOP.

K. Handling Facility Sanitation

1. Sanitation program
205.201(a)(5)
205.272(a)
- Your sanitation program needs to be implemented in such a way as to protect all organic ingredients, works in progress, and finished goods in storage from contact with sanitizers and cleaners. Sanitation records need to be kept to verify this point.

2. Food surfaces
205.272(a)(2)

It is important that all cleaner and sanitizer residues are removed prior to introducing organic ingredients to food contact surfaces. Depending on the equipment involved, this may include sweeping, vacuuming, washing, rinsing, or purging the equipment prior to the introduction of organic goods. The inspector will review the sanitation standard operating procedures (SSOP's) and other records or logs documenting that all appropriate steps have been taken. Sanitizer residue or pH test results are required to verify, on an appropriate routine schedule, that food contact surfaces are free from contaminants.

3. Container use &
re-use
205.272(b)(2)

Some operations use or re-use various containers for temporarily holding ingredients, works in progress, or finished products prior to the next step in the production flow. Of course, all such containers need to be designed and approved for food contact use. When using these containers, you will need to make sure that all cleaning or sanitizing substances are completely removed prior to using them to hold organic goods. Removal by rinsing, sweeping or other means needs to be documented each time unless these activities are part of a formal, documented standard operating procedure. Both the inspector and QAI will review all such records and SOP's.

4. Packaging materials
205.272(b)(1)

When selecting packaging materials, storage containers, bags, boxes, holding bins and the like for use in your production system, make sure to choose those that do not contain any synthetic fungicides, preservatives, or fumigants. Such containers and packaging materials are strictly prohibited for use with organic goods.

L. Quality Assurance

1. NOP compliance
205.103(b)(4)
205.201(a)(1-6)

Your quality management system needs to take into account your organic processing activities and ensure that those activities are compliant with all organic regulations as noted in the NOP. The records that you keep will be reviewed during each inspection to verify compliance with the NOP. When completed and agreed to by QAI, the Organic Compliance Plan Overview, described in part C, will describe the quality systems in place at your facility that ensure compliance with the NOP.

2. Management system
205.103(b)(4)
205.201(a)(1-6)
- Some operations have instituted programmatic quality assurance programs such as Total Quality Management, Hazard Analysis and Critical Control Point, or ISO 9000 series systems. These systems follow a formal series of steps to ensure a desired level of quality in the process and products. Many, if not most, operations have designed and implemented general Quality Assurance programs that address process and product quality. In most instances where an existing conventional processor begins developing organic products, the QA program will need to be amended to include monitoring and oversight of sourcing, handling, processing, and storage of organic ingredients and products.
3. Complaint
documentation
205.103(b)(4)
205.201(a)(1-6)
- The inspector will review your systems for documenting and addressing all complaints that relate to organic compliance.
- M. Application
Explanation**
- This section is provided for the producer to record detailed explanations of all “No” responses in the Dairy Organic Compliance Plan and/or Individual Forage Zone Profile (IFZP) or Individual Colony Profile (ICP) form(s).

The following page corresponds directly with the QAI Individual Forage Zone Profile (IFZP)

Individual Forage Zone Profile

205.237(a)

- A. Forage Area Identification** Forage area identification may take the form of a name, location or other code that clearly and individually identifies each distinct area used for forage. The location of each forage area, including town, county, state or province, and any additional pertinent details should be included.
- B. Owner/Custodian** The individual or entity, such as a government agency, that manages each land area used for forage must be identified.
- C. Acreage** Please tell us the total acreage for the bee forage area represented on this Individual Forage Area Profile.
- D. Forage Dates** Providing the estimated forage date(s) assists QAI in scheduling your inspection at the appropriate time.
- E. Forage Zone Map** For each separate forage area a map is needed that shows forage areas that are under organic management or that have had no prohibited materials applied within the previous 3 years. Maps are to be of sufficient scale to locate the parcels in the area and identify each parcel by its individual designation. The map must include identification of different areas according to the organic, transitional, wild or conventional status of each, the acreage, the forage plants grown that year, hive location(s), boundary markings, public and private roads, buffer zones, water sources and buildings. Topographical features, prevailing wind direction, the nature of surrounding land uses, and any known or suspected potential sources of contamination located within 4 miles of a colony must also be noted on the map.
- F. Forage Plants** Please indicate the type of plants that are planted or managed organically, acreage, and expected dates of bloom. Documentation of the organic status of these plants should be maintained in the form of current certificates. If the organic land is managed as part of your operation, please complete a Producer Organic Compliance Plan.
- Please indicate the bee forage plants that are expected to bloom in areas that have been free of prohibited materials for at least 3 years from the first expected bloom date.

Documentation, such as affidavits from owners, should be maintained to show that no prohibited materials have been applied to these areas.

**G. Sources of
Potential
Contamination**

Please list any sites within 4 miles of colony location(s) that may constitute potential sources of contamination, such as conventionally managed fields, golf courses, landfills, and industrial facilities. Note mitigating factors, such as barriers, prevailing winds, timing of preferred forage bloom, etc.

This page corresponds directly with the QAI Colony Health Profile (CHP).

- A. Colony Identification** Please indicate how this colony is identified.
- B. Colony Description** Species of bees, number and size of hives, and materials used in the construction of the hives should be noted here.
- C. Colony Health Management** Please provide a list of all health inputs you have used in the previous season or plan to use on your organic colony, including the brand name and reason for use. In addition, the inspector will verify that you have sufficient documentation to show that each particular treatment is compliant with NOP and its annotation (if applicable).
- Please provide a list of all organic honey, sugar syrup, pollen, and similar supplements you intend to feed the colony, including brand name and amount to be fed.
- Please provide an explanation for the use of each treatment or supplement.
- Additionally you need to verify that you have documented the treatment is compliant with the National List.
- Specific situations**
205.603 Many specific situations may be unique to a particular operation. Issues arising from unique uses of materials and ingredients are handled and reviewed on a case-by-case basis. Prior to including a synthetic material, processing aid, or ingredient in your organic products, please refer to NOP section 205.603 to ensure its inclusion on the list of allowed synthetics and your use of any such material is consistent with the annotations provided.

The following pages correspond directly with the QAI Individual Product Profile (IPP).

Individual Product Profile

- A. Products**
205.103(b)(2)
205.201(a)(2)
- A completed and current Individual Product Profile (IPP) along with a product label for each product seeking certification is required to be filed with the QAI application and will be reviewed for accuracy by the inspector. When requesting certification of a new product after initial certification, you need to submit for approval a completed IPP, including labels and supporting documentation for each new product prior to sale.
- B. Volume**
- This is the place to indicate the projected sales volumes for each product.
- C. Brand Names**
- Part C asks for a list of the brand names that you own or control.
- D. Private Labels**
- Part D asks for those brand names of products that are produced and packaged at your facility but are private labels for another company.
- E. Processing Aids**
205.605
- This is a list of all processing aids used in the product identified. Processing aids are 1) substances added to a food that are later removed, 2) a substance that is converted into food, or 3) is present in the final product at insignificant levels, having no technical or functional effect in the food (e.g., filtering aids, flow agents, emulsifiers, anti-foaming agents, etc.).
- F. Label claims**
205.300-311
- This part asks you to clearly identify which label claim this product will be making, '100% Organic', 'Organic', or 'Made with Organic...'
- G. Product Use**
- Indicate here whether this product will be sold for human consumption or for another purpose (e.g., nutritional supplement, health & beauty aid, fiber product). Please contact QAI for the appropriate form for Livestock Feed. Livestock feed must comply with NOP 205.237.
- H. International**
- By providing your market information, QAI can review products regarding compliance for international access.

I. Product Composition
205.605

This is a key component of your application; the list of ingredients is reviewed thoroughly prior to certification. It is vital that the table is complete and accurate. It needs to include each ingredient, the supplier, the certifier of the ingredient, and the ingredient's percentage in the final product. Be sure to exclude water and salt (sodium chloride) from the percentage calculation. Please refer to NOP 205.302 for instructions on calculating the percentage of organically produced products.

Take note, under the NOP, only ingredients, whether domestic or imported, that are certified by USDA-Accredited certification agents will be acceptable in QAI-certified products.

J. Product Representation
205.300-311

There are three categories of organic labeling allowed under organic standards:

- 100% Organic
- Organic
- Made with Organic

Each organic product can apply for only one labeling category. Each category has specific limitations and requirements regarding the ingredients and how the product can be referenced as organic on the label. The requirements are addressed below.

In order to qualify for organic certification, either a "yes" or a "not used" response is required for each question asked under the chosen category.

100% Organic claims

If the label(s) indicates the product is "100% Organic" then it must include the language "Certified Organic by Quality Assurance International" or "Certified Organic by QAI" This statement should appear on the information panel, below the information identifying the handler or distributor of the product. Including the QAI logo and USDA seal is optional.

Each ingredient needs to be certified as 100% Organic to be included in this type of product. The organic certificates, from your supplier, listing these ingredients must specify their 100% organic status. Alternately, the certifier of the ingredient may provide a different verification of the 100%.

If any processing aids, such as a pan release agent are used,

these processing aids will need to be certified as Organic (95% or more) in order to make a 100% Organic claim.

Organic claims

If the label(s) indicates the product(s) is “Organic” then it must clearly identify the name of the final handler of the product. The language “Certified Organic by Quality Assurance International” or “Certified Organic by QAI” must also be present. This statement should appear on the information panel, below the information identifying the handler or distributor of the product. For products labeled as “Organic” each organic ingredient in the ingredient statement must be identified with the word organic an asterisk or other reference mark, which is defined below the ingredient statement to indicate that the organic ingredient is organically produced. Including the QAI logo and USDA seal is optional.

These products must include at least 95% organic ingredients and use non-organic ingredients in the remaining 5% only when organic ingredients are not commercially available. You will need to record your attempts to source all organic ingredients before opting to use a non-organic one. Please be aware, that these recorded attempts will need to be reviewed and accepted prior to using the non-organic ingredients.

If any non-agricultural ingredients are used (such as flavors, yeast, leavening agents, etc.), they must appear on the list of allowed non-agricultural ingredients in section 205.605 of the rule.

Non-organic agricultural ingredients may be used as part of the non-organic portion of the product provided all agricultural products are produced using only materials approved on the National List. For example, agricultural products may not be produced using a volatile synthetic solvent or other synthetic processing aid not allowed under 205.605. If you are using a non-organic agricultural ingredient that is listed in section 205.606 of the regulation (such as cornstarch, pectin, etc.) specific annotations must be met.

Made with Organic claims

If the label(s) indicates the product(s) is “Made with Organic” then it must clearly identify the name of the final handler of the product. The language “Certified Organic by Quality Assurance International” or “Certified Organic by QAI” must also be present. This statement should appear on the information panel, below the information identifying the handler or distributor of the product. The ingredient panel must indicate which ingredients are organic.

Please note, the QAI logo may be used to represent the product, but the USDA seal is not allowed in connection with “Made with Organic” products.

When you make this claim, you may include three items or food groups in the list of “made with” ingredients on your principle display panel; for example, you may say: “Made with organic carrots, barley, and potatoes.” Please be aware that these statements may not appear in letters that exceed one-half the size of the largest type size on the panel and must appear in their entirety in the same size, style, and color without highlighting. Each organic ingredient in the ingredient statement must be identified with the word organic an asterisk or other reference mark, which is defined below the ingredient statement to indicate that the organic ingredient is organically produced.

If any non-agricultural ingredients are used (such as flavors, yeast, leavening agents, etc.), they must appear on the list of allowed non-agricultural ingredients in section 205.605 of the rule.

Non-organic agricultural ingredients may be used as part of the non-organic portion of the product. If you are using a non-organic agricultural ingredient that is listed in section 205.606 of the regulation (such as cornstarch, pectin, etc.) specific restrictions included in this section must be met.

K. Excluded methods
205.105(e)

For all labeling categories, you will need to verify that each *non-organic* ingredient in your product was produced and handled without the use of:

- genetically engineered organisms (“GEO’s”),
- irradiation, or
- sewage sludge.

Acceptable letters from suppliers including this information is an example of adequate verification. QAI is aware of the difficulty in acquiring this type of documentation from growers and suppliers of non-organic ingredients. We make every effort to be reasonable and accommodating while maintaining the organic integrity of organic goods.

L. Bulk Labeling
205.307

Product identification for non-retail products must be apparent in the form of a lot number or other tracking device. Also, all organic ingredients must be distinguished.

Specific situations
205.605

Many specific situations may be unique to a particular operation. Issues arising from unique uses of materials and ingredients are handled and reviewed on a case-by-case basis. Prior to including a synthetic material, processing aid, or ingredient in your organic products, please refer to NOP section 205.605 to ensure its inclusion on the list of allowed synthetics and your use of any such material is consistent with the annotations provided.

Preparing for the Inspection

Congratulations. You have completed your application. So, what happens next?

After your application is reviewed by QAI, an on-site inspection will be scheduled. In order to facilitate the inspection process, the following documents need to be available to the inspector for review. Having these documents ready for the inspector will allow for the inspection to go quickly. Also, these will help prevent the need for your sending further information to QAI during the review process.

Documentation Requirements for the On-Site Visit:

- ✓ Extraction Records – These may be in the form of yield logs or other documents. .
- ✓ Storage and Inventory Records – Please have available any inventory logs and movement records applicable to your operations.
- ✓ Colony Health Management Records – Specific records including all medical treatments and procedures should be available for every individual colony.
- ✓ Bee Replacement Procurement Records – The inspector will verify when all replacement bees are received and introduced to the colony.
- ✓ Production and Batch Records – Specific records related to the combination and/or processing of organic honey and ingredients will be verified by the inspector.
- ✓ Distribution Records – Shipping logs, BOLs, and sales records must be available to verify the representation of the outbound organic milk or livestock shipments. Please make available any "Clean Truck Affidavits" used to verify the status of shipping vehicles.

We hope this guidance booklet was useful in completing the certification process. We look forward to providing you with continued service for all of your certification needs.

Appendix

The National Organic Program regulation has been provided to you in an appendix booklet. It is also available on the NOP web site at www.ams.usda.gov/nop. Please read and familiarize yourself with this regulation, these are the standards and requirements your operation must comply with.