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November 5, 2012

Miles McEvoy, Deputy Administrator
U.S. Department of Agriculture National Organic Program
1400 Independence Avenue, SW
Room 2646-So. (Stop 0268)
Washington, DC 20250

Dear Miles:

The Accredited Certifiers Association convened a Working Group to identify the issues of particular interest in the certification of parallel production of organic products. Accredited Certifying Agents certify a variety of production operations, including those that may produce certified organic, transitional and conventional products of the same variety at the same location. In our discussions it was noted that ACAs do provide additional scrutiny of parallel production operations in order to insure the integrity of the organic products.

The EU definition of Parallel Production formed the basis for our discussions:

Parallel Production is the production of visually indistinguishable varieties of commodities.

The EU regulation stipulates that visually indistinguishable EU organic and conventional products have to be grown in separate holdings. Holdings are defined as “all the production units operated under a single management...” In the US, parallel production is viewed mainly at the production level, not at the holding or management level.

ACAs gather information through the Organic System Plan (OSP) of the applicant – be it a producer or a handler. The OSP is reviewed for completeness and then an on-site inspection is conducted. Additionally, if inconsistencies are found, ACAs conduct extensive audits of the operation. Our outline below provides an overview of the types of information addressed in the Organic System Plan, during the inspection, and issues that may trigger in depth auditing of the operation.

If you have questions on this information, please feel free to contact me.

Sincerely,

Patricia Kane
ACA Coordinator

Parallel Production of Organic Products

The following information is obtained through the Organic System Plan

From Producers

- a) List of products that are grown organically, transitionally and conventionally, including projected yields
- b) Field Maps indicating the location, size of organic, transitional and conventionally managed fields, and indicating buffer zones
- c) Field History for all land under producers' management
- d) For greenhouse production, location and size of all greenhouses must be map. Description of system for prevention of drift through ventilation and/or watering systems.
- e) Identification of equipment that is dedicated to organic production
- f) Clean out practices for equipment that is not dedicated to organic production
- g) List of pest, disease, and weed management farm inputs used for organic, transitional and conventional production
- h) Details regarding separate storage facilities for farm inputs if producing organic, transitional and conventionally produced crops. Are storage areas labeled.
- i) Details of whether records of farm activities for organic, transitional and conventionally produced products are maintained
- j) Details of whether separate containers are used for harvest and transport of organic, transitional and conventionally produced products
- k) How the producer ensures separation in post harvest handling
- l) Details of harvest records maintained for organic, transitional and conventionally produced crops, and crops from buffer zone areas
- m) Details of transportation practices – type of packaging, inspection and cleanout of transport vehicle prior to loading
- n) Details of sales records, including lot numbering system, proper identification of crops and livestock products (organic, transitional, conventional)
- o) Details of training procedures for employees
- p) For livestock operations, information on the type (organic, transitional, conventional) of animals on the operation and identification system utilized
- q) Plan for keeping the organic herd/flock separate and distinct from a conventional herd/flock
- r) Identification method used to differentiate between an animal being treated / managed organically and an animal being managed conventionally. If organic animals are treated with prohibited materials how are they identified and / or segregated
- s) If processing livestock feed on farm, how is the equipment cleaned prior to processing organic feed
- t) Description of storage areas for organic and conventional feeds; description of storage capacity

The following information is obtained through the Organic System Plan (cont.)

From Handlers

- a) Specific question in OSP regarding whether parallel production occurs.
- b) Facility maps indicating movement of all products, from receiving through production to outgoing/shipping. Off-site facilities are also included. Include storage areas for ingredients.
- c) Description of sanitation practices both for production equipment and facility.
- d) A description of the measures in place to prevent commingling, including if products produced in parallel production are separated by time and place.
- e) Description of production and sales records, including records maintained for organic and conventional products.
- f) Description of lot numbering system for both organic and conventional processed products.
- g) Description of storage areas for organic and conventional finished products, including whether identified in some manner.
- h) Description of transport practices, clean out procedures and procedures used to prevent manipulation or substitution.
- i) Description of procedures used to identify the product on the bill of lading.
- j) Details of training procedures for employees

Inspection Practices for Parallel Production Operations

- a) Inspection reports include a section for review of parallel production operations.
- b) Inspectors review and observe the following areas to verify that OSP reflects practices actually used: (usually a mirror of the OSP section)
 - Verification of products produced organically, transitionally, and conventionally
 - Verification of separation of production and processing
 - Verification of separation of inputs (farm and/or handling)
 - Verification of cleaning practices (harvest equipment, processing equipment, transport equipment)
 - Verification of practices used to prevent commingling
 - Verification of separation of storage facilities
 - Verification of maintenance of production records for organic, transition and conventionally produced products
 - Verification of sales records for organic, transitional and conventionally produced products
 - For livestock operations, verification of herd records including breeding, purchase, sale and health records. Verification of pasture use. Verification of separation of organic and conventional herd. Verification of separation and labeling of feed storage areas.
- c) Inspectors indicate any discrepancies from the information provided in the OSP.
- d) Inspectors indicate whether or not they were provided with access to all organic and nonorganic production and handling areas, including fields, buildings, storage facilities, offices and record keeping.

Auditing of Parallel Production Operations

A review of production and sales records is a requirement in the organic inspection. In parallel production operations inspectors pay particular attention to the sales records of the operation in relation to production capacity. A full production audit (detailed review of all records) is initiated in the following instances:

- if the organic system plan is not being followed with regard to recording parallel production information
- high sales volumes of organic products relative to production acreage
- suspicion of incomplete/inconsistent information provided by producer
- complaints about producer
- positive results for pesticide residue
- lack of clear separation in post harvest handling and storage
- evidence that employees do not understand the difference between organic and conventional production

The types of records reviewed include:

For farm operations:

seed purchase records	clean out logs
farm inputs purchase records	harvest records
livestock health records	packing records
livestock breeding records	storage records
livestock sales records	transport records
livestock feed purchase records	sales records
daily activity logs	

For handling operations:

ingredient purchase records	sanitation practices
storage records for ingredients	storage records for finished products
production records	review of in/out balance sheets
equipment cleaning records	