Types of recordkeeping reviewed and verified during a food safety audit or organic inspection:

<table>
<thead>
<tr>
<th>Topic</th>
<th>FEDERAL REGULATIONS</th>
<th>GUIDANCE DOCUMENTS AND APPLICABILITY</th>
<th>ORGANIC</th>
<th>CO-COMPLIANCE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>FEDERAL REGULATIONS</strong></td>
<td>Law: Food Safety Modernization Act (FSMA)</td>
<td>Regulation: Final Rule on Produce Safety, Standards for Growing, Harvesting, Packing and Holding Produce for Human Consumption</td>
<td><em>USDA Organic Regulations</em></td>
<td>Developers should be familiar with and follow USDA Organic and FDA Produce Safety Rule, as applicable to their food production, handling and sales activities.</td>
</tr>
<tr>
<td><strong>GUIDANCE DOCUMENTS AND APPLICABILITY</strong></td>
<td>Exemption: Producers not eat rare, few, and produce for personal consumption</td>
<td>Exemption: Producers with annual organic production of less than $5,000 are exempt from certification, but must follow all other organic regulations, including recordkeeping.</td>
<td>USDA NOP Handbook</td>
<td>Keep records to show how your operation meets exemption criteria AND complies with applicable regulations.</td>
</tr>
<tr>
<td><strong>WRITTEN PLANS</strong></td>
<td>FHA Produce Safety Rule recommends, but does NOT require, a Food Safety Plan</td>
<td>An Organic System Plan (OSP) is required and based on content as described in USDA organic regulations:</td>
<td>Plans are farm management tools helpful for establishing operations. A producer must review and update the OSP &amp; FSP at least annually.</td>
<td>USDA NOP Handbook</td>
</tr>
<tr>
<td><strong>RECORD-KEEPING</strong></td>
<td>Each subpart of the regulation has its own recordkeeping requirements.</td>
<td>A complete audit trail includes OSP practice descriptions &amp; material lists and:</td>
<td>Plans, Records and Documents are all critical recordkeeping components that show implementation of good organic and food safety practices.</td>
<td>USDA NOP Handbook</td>
</tr>
<tr>
<td><strong>LAND</strong></td>
<td>FHA Produce Safety rule recommends, but does NOT require, a farm to carry out an operational assessment</td>
<td>Must not be used prohibited materials (synthetic fertilizers, pesticides, sewage sludge, etc.) for 36 months before harvest of a certified organic crop</td>
<td>Production and use history assessment must address both substances prohibited for use in organic systems, and risks to food safety.</td>
<td>USDA NOP Handbook</td>
</tr>
<tr>
<td><strong>WORKER HEALTH AND HYGIENE</strong></td>
<td>Training is required.</td>
<td>Maintain or improve the natural resources of the operation, including soil, water, wetlands, woodlands, and wildlife.</td>
<td>Monitor crop production and handling areas for evidence of domestic or wild animal intrusion.</td>
<td>USDA NOP Handbook</td>
</tr>
<tr>
<td><strong>NATURAL RESOURCES, DOMESTICATED &amp; WILD ANIMALS</strong></td>
<td>Must be incorporated 90 days prior to harvest.</td>
<td>Require proper recordkeeping, monitoring, and monitoring plans</td>
<td>Recordkeeping, monitoring, and monitoring plans</td>
<td>USDA NOP Handbook</td>
</tr>
<tr>
<td><strong>CROP NUTRITION AND PLANT PROTECTION MANAGEMENT</strong></td>
<td>Required: D: Supplier letters of guarantee that materials do not present a contamination risk to crops or soil</td>
<td>Producers must verify that all material is allowed for use in organic production, AND</td>
<td>A complete audit trail includes tracking of all substances used. Although FDA Produce Safety Rule does not specifically require input applications in the audit trail, many third party auditors require both input material and application method.</td>
<td>USDA NOP Handbook</td>
</tr>
<tr>
<td>1. Fertilizer and Soil Amendments of Animal Origin</td>
<td>No requirement for recordkeeping.</td>
<td>Must be in the producer’s OSP and approved for their intended use by the certifier</td>
<td>Required: D: Approved material’s list</td>
<td>USDA NOP Handbook</td>
</tr>
<tr>
<td>2. Biological Soil Amendments of Animal Origin</td>
<td>Bio solids and Sewage Sludge are NOT permitted</td>
<td>Producers should be familiar with and follow USDA Organic and FDA Produce Safety Rule, as applicable to their food production, handling and sales activities.</td>
<td>USDA NOP Handbook</td>
<td>Bio solids and Sewage Sludge: Certified organic producers are prohibited from using these materials.</td>
</tr>
</tbody>
</table>

**FOOD SAFETY**

*FDA Produce Safety Rule*

**Regulation:** Final Rule on Produce Safety, Standards for Growing, Harvesting, Packing and Holding Produce for Human Consumption

**Exemption:** Producers not eat rare, few, and produce for personal consumption

- Any farm or mixed farm facility that has a $25,000 annual average sales or less of covered produce during the previous 3-year period
- Qualified Exemption (see criteria in text box)**

**WRITTEN PLANS**

FHA Produce Safety Rule recommends, but does NOT require, a Food Safety Plan

**RECORD-KEEPING**

Each subpart of the regulation has its own recordkeeping requirements.

- Sales records to prove and maintain a qualified exemption, kept 4 years.
- Water test records, kept 4 years or longer.
- Other records must be kept for 2 years
- Some records must be signed by the person responsible for food safety.

A complete audit trail includes OSP practice descriptions & material lists and:

- Sales records;
- Harvest records;
- Input application records;
- Crop production and rotation;
- All documents and records must be kept for at least 5 years

**LAND**

FHA Produce Safety rule recommends, but does NOT require, a farm to carry out an operational assessment

**WORKER HEALTH AND HYGIENE**

Training is required.

- Supervisor or responsible party must successfully complete an FDA-approved training in food safety and personal health and hygiene
- Personnel and volunteers must receive basic training in principles of food safety & importance of personal health and hygiene
- Harvesting employees crop must be trained on pre-harvest inspections of produce and harvest equipment and packaging materials

This topic is not addressed directly by USDA organic regulations.

**NATURAL RESOURCES, DOMESTICATED & WILD ANIMALS**

- Monitor crop production and handling areas for evidence of domestic or wild animal intrusion.
- Prevent contamination of produce by pathogens from animals, both domesticated and wild, and the environment.

- Must maintain or improve the natural resources of the operation, including soil, water, wetlands, woodlands, and wildlife.
- Prevent contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances

- Producers must verify that all material is allowed for use in organic production, AND
- Must be in the producer’s OSP and approved for their intended use by the certifier

**CROP NUTRITION AND PLANT PROTECTION MANAGEMENT**

- Producers should be familiar with and follow USDA Organic and FDA Produce Safety Rule, as applicable to their food production, handling and sales activities.

- Producers with annual organic production of less than $5,000 are exempt from certification, but must follow all other organic regulations, including recordkeeping.

- Production and use history assessment must address both substances prohibited for use in organic systems, and risks to food safety.

- Land use document should meet both food safety and organic requirement; Include site map showing boundaries and buffers.

- Producers must verify that all material is allowed for use in organic production, AND
- Must be in the producer’s OSP and approved for their intended use by the certifier

- Producers should be familiar with and follow USDA Organic and FDA Produce Safety Rule, as applicable to their food production, handling and sales activities.

- FSMA’s Produce Safety Rule does not conflict with, or duplicate regulations of other federal agencies (including USDA NOP) that support natural resource management and conservation practices.
This chart intends to provide farmers with the understanding they need to design, implement, and document compliant practices with federal regulations for both food safety and organic certification. ALBA/NCAT’s On-Farm Food Safety and Organic Certification Guide for Crop Producers, parallels this chart to provide more detailed explanation.

**The FSMA Qualified Exemption**

Growers are eligible for a qualified exemption for a calendar year from FSMA rules if the following are true in the past 3 years:

1. The average food sales sold to qualified end users (direct to consumer, restaurant, or retail) is more than the average sales of covered produce to non-qualified end users;
2. The average sales were less than $500,000; and
3. The average sales were adjusted to inflation using 2011 as the baseline year.

*FSMA exempt farms still must follow Subparts A, D, R, & R. In addition, exempt producers must adhere to standards in §112.8 labeling requirements for direct markets and §112.7 annual review to verify continued eligibility for qualified exemption.*

Disclaimer regarding Food Safety and Organic Compliance:

Before using any of these sample templates or forms, please check with your intended certifier. Although content is based on regulations, the format or terminology of specific forms required may vary between certification agencies.