Recordkeeping for Certified Operations

1. Purpose

This instruction outlines recordkeeping requirements under the OCal Program and provides examples of the types of records that should be maintained as verification of information in a certified operation’s OCal system plan (OSP) and used to demonstrate compliance with the OCal regulations.

2. OCal Regulations

Title 3 California Code of Regulations (3 CCR)

3 CCR § 10000. Definitions.

3 CCR § 10104. Recordkeeping by certified operations.

3 CCR § 10201. OCal cultivation and distribution system plan (OCal system plan).

3 CCR § 10506. Continuation of certification.

3. Policy

Certifying agents verify an operator’s compliance with the OCal regulations by reviewing the OSP and certification records.

Certified operations demonstrate compliance with the OCal regulations by ensuring appropriate records are maintained, up to date and sufficiently document the practices, procedures, and inputs used by the operation.

Certified operations and registered certifying agents may consider which records are needed for a specific operation when establishing their recordkeeping approaches.

Registered certifying agents may provide their certified operations with an OSP or recordkeeping forms for use or as examples.

Records maintained by a certified operation to demonstrate compliance with the OCal regulations must be listed in the OSP.
4. Procedure

Following are examples of records that can be used to demonstrate compliance with the OCal recordkeeping and documentation regulations. Records not listed below may also be used to verify compliance. A certified operation should check with its registered certifying agent to make sure it is maintaining appropriate records and documentation to demonstrate compliance.

4.1. OCal Cultivator Records

a. Seeds and Transplants – including Cover Crop
   1. Receipts of seeds and transplants delivered to operation
   2. Invoices of seeds and transplants purchased
   3. Seed packages and labels
   4. Phone logs of attempts to obtain OCal seeds and transplants
   5. Seed catalogs
   6. Letters from seed suppliers concerning the availability of OCal seeds
   7. Copies of OCal certificates from suppliers of OCal seeds
   8. For seed savers - harvest records showing production of OCal seed
   9. Seed treatment records
   10. Verification from supplier that non-OCal seed is not genetically modified.

b. Material Application Records
   1. Fertilizer and soil amendments - application records for fertilizers, manure, compost, soil amendments, and synthetic micronutrients
   2. Pest control products – application records for pesticides, acidifiers, spreader/stickers and other spray adjuvants
   3. Crop production aids – application records for foliar sprays, gibberellic acid, kelp or other approved products
   4. Invoices or receipts for all materials purchased including custom applicator invoices

C. Production Records
   1. Operation activity log
   2. Invoices for contracted services (e.g. seeding, mowing, spreading manure, recycling etc.)
   3. Recommendations from pest consultants or other field persons

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4. Soil, water and tissue analysis reports
5. Records of cultivation practices, soil or nutrient recycling, and weeding and planting dates
6. Compost production records
7. Post-harvest processing equipment use and cleaning, containers, and storage and processing areas clean-out and reuse

d. Field History Records
1. Cropping history or land use for the previous three years
2. Material application records for the previous three years
3. A copy of the organic or OCal certificate if the land was previously certified under another cultivator’s organic or OCal certificate
4. Lease agreements
5. Maps

e. Track-and-Trace Records
1. Harvest
2. Storage
3. Inventory reports for finished products
4. Packaging reports
5. Sales
6. Receipts/invoices
7. Transport manifests
8. OCal tracking
9. Certificates of analyses
10. Other Track-and-Trace records that verify the amounts harvested and sold

f. Other Records
1. Clean truck affidavit for bulk products transported by transport-only distributor
2. Sales summaries from processors or distributors

4.2. OCal Distributor Records

a. Track-and-Trace records
1. Receiving and distribution manifests
2. Receipt of products
3. Inventory reports
4. Packaging reports
5. Storage
6. Sales records
7. Receipts/invoices
8. Transport manifests
9. OCal tracking
10. Other Track-and-Trace records that verify the amount received and distributed

b. Other Receipt and Distribution Records
   1. OCal certificate for each OCal product received
   2. Clean truck affidavit for bulk products transported by transport-only distributor
   3. OCal cultivator certificate
   4. Certificates of analyses or product specification sheets
   5. Sales, accounts payable, accounts receivable, and cash disbursement journals

c. Storage and Production Records – Records That Describe Handling and Processing Activities
   1. Quality control reports
   2. Records regarding reconditioning, shrinkage, dumping, container, packaging, storage and processing area clean-out and reuse
   3. Purchased inputs, including sanitizers, pest management materials
   4. Pest control and sanitation logs