

Recordkeeping for Organic Handlers

Jill Brockman-Cummings (00:18):

Those are something else. Okay. Those are Decembers. Let's look at November 1st. Okay.

Ellen Rawley (00:24):

The biggest challenge in the certification process is really implementing the recordkeeping.

Harold Wilken (00:30):

I, well, I call it a paperwork colonoscopy, but I want to make sure it's done, you know?

Griffin Berger (00:37):

Okay, so recordkeeping, that's the big scary word that everybody's afraid of. How do we keep records? We are held to the same standard and responsibility to keep and maintain records as the largest multimillion, multibillion dollar organization. So you just have to get over that and decide you love recordkeeping.

Jill Brockman-Cummings (01:00):

Document everything you do. From everything you bring into your facility, everything you produce, document it, dates, weights, everything. I can't say enough, you just got to document. You have to have a paper trail with everything you do.

Mike Dill (01:17):

You have to be able to demonstrate that the ingredients that you purchased were organic. You have to demonstrate that you maintained organic status as those products were in your possession. And then when you finish your product and you're sending it out, that you've maintained that organic integrity the whole time. So the recordkeeping that organic requires, most of it is records that you want to keep no matter what. As a business, I want to know what ingredients are coming in, how much, where they're coming from. I want to know how many units we made or moved through our facility. I want to know how many we sold, how much we sold them for. I mean, these are all basic records that any business should be keeping. The only difference with organic is that they require it and we must keep these records.

Amanda James-Martin (02:12):

If I were just starting out, I think a good place to get information would be from really multiple certifiers. Almost every certifier has a lot of information on their sites about how to get started. A lot of them even have, like, training materials that you can download out of there.

Jessica Jones (02:28):

And they almost certainly have prebuilt spreadsheet templates for your organic ingredients and processing aids inventory, for your handler input inventory, for your product profiles. Use the systems that naturally flow out of the materials they give you, and then it gets really easy.

Chad Olson (02:47):

And when you read into the organic regulations, there's no set manner in which to do things. They don't give you a log book and tell you to use this log book. You can make your own on a spiral notebook. You can go to Excel and type it up yourself, and you just need to make what you need to use.

Ellen Rawley (03:06):

Don't just give it to your certifiers like, "This is what we're going to use for a week." Implement them in your operation and see what worked about it and what didn't. Kind of fill in and flush out that system by actually using it. What can I do? What can I not do? What other information would be helpful to have?

Nate Powell-Palm (03:28):

If you have any gaps where you're like, "It's just a black box. I don't really know how we got from this ingredient to this finished product," you have identified a hole in the system that needs to be addressed. So prepping your system by just auditing your own recordkeeping system and asking, "Can I do this exercise on my own?"

Ellen Rawley (03:46):

It takes three years to really dial in a system. And that shouldn't be scary. That should be like, "Oh, okay. I don't have all this pressure on me upfront to get it completely right." And then of course, I might change something about my operation and I'm going to start tweaking it again. It can be a process.

Jessica Jones (04:04):

Setting it up is difficult and just is a lot of attention to detail. But once that detail is put in place, it provides the canvas for you to do all of the beautiful things you're doing with your organic ingredients and be compliant.

Nate Powell-Palm (04:29):

Definitely in the beginning, I think having a third-party consultant who can handhold throughout the process is a great investment. Like you're really never going to regret that.

Michelle Pusateri (04:38):

When I had that first inspection, it was a mess. Like, I didn't know what I was doing. And then I got a suggestion from a peer, "Hey, I'm using this person who helps me with audits. You should really contact them." And I did, and it was like one of the best things that I could do. So if you have that



opportunity and availability and cashflow to hire somebody on, it is expensive, but it's also like you have an extra set of eyes before every inspection.

Nate Powell-Palm (05:09):

Also those folks I think are really primed to help build out your team, train your team, prep your team to one day not need their services. They're going to help you get through your first organic inspection, maybe your second, but they're also hopefully going to be educators and help you understand how to internalize this sort of quality control, so that you can do it yourselves.

Genevieve Albers (05:35):

Standardization, documentation, and traceability. So as long as you're consistent, and accurate, and complete, I think you're in business.

Griffin Berger (05:48):

And recordkeeping is easy if you're always doing it. If you're always on top of it and you have it a part of your everyday function or as things show up. It's really hard to find records and keep all the information together at the last minute right before your inspection. Every single log book should be located in a place where it's actually going to be used and findable. If you have all your books in one place or all your files in one place, nobody's ever going to find it. Nobody's going to use it. You're going to not have great recordkeeping.

Joey Smyser (06:17):

Get yourself a good file system, because one of the key things in any inspection is being able to breeze through and locate what you need in a timely manner. Being efficient and effective with how you label and how you do things is key.

Ellen Rawley (06:31):

If your systems are pretty haphazard and it takes you a really long time to access the information, then your inspection's just going to be longer. And depending on who you're certified with, possibly costs you more.

Humberto Maldonado (06:46):

Make the system work for you. Do not create a system so complicated that you work for the system.

Johanna Phillips (06:52):

If you create complexity in your system, you have to comply with your complexity. So if you do that, it's going to suck. Complexity does not equal compliance.

Ellen Rawley (07:10):

There's folks that they really still like paper records. If that's you, then stick with that.



Kaylee Pickering (07:17):

Our recordkeeping is super old school. We utilize paper and pen as much as we can.

Jessica Jones (07:24):

The worst thing about organic certification is that I have to use a spreadsheet. I don't like spreadsheets.

Joey Smyser (07:32):

We keep it paper just because that's how we've always done it. It's a lot easier to track on our end because there's just so many moving parts.

Griffin Berger (07:40):

And then on the 12th of October, it went out to processing. You get one of these from Office Depot, you print them out, you put everything in order. It just makes everything look clean, neat, and tidy and you can fit it in. And if you can't fit it into one book, you just get two books, piece of cake. In the case of a power outage or a software update, we know that we have got everything on hand. If we're drying, then that's a dry dehydration log. If we're grinding, then we have a separate grinding log. If somebody's doing an activity, I want them to be writing it down. I don't want to be recording it. I don't want them hopping on their phone, logging into an app, writing something down, and then while they're there, they're checking their email, they're sending text messages, they're taking selfies, or have to have an iPad attached to a wall and is it charged? Does it have enough power? For me, in our operation, this makes the most sense of just having paper copies printed out. I have my book situated where regardless of who walks through the door, whether it's the FDA, USDA, or the organic department, I am ready for an audit because everything's in the same place. So for me, that really simplifies things.

Ellen Rawley (08:49):

Don't try to complicate it by now using technology that you don't really know how to use, that you might lose information and all that stuff. I don't think there's any reason, especially depending, I should say, on your size to not use paper records. They can totally work.

Jill Brockman-Cummings (09:11):

You know, it was the earliest it would've been would be October, so. So before we had QuickBooks for this, and we had a spreadsheet for that, and I had binders for this. Now it's all in one system. And a steep learning curve, but I can tell already that, like, <laugh> it's going to be so much easier. It's called Acumatica. It was customized to us and it's still being customized to us. So then that lot will get transferred to that person's invoice. So there's the traceability right there. Knowing now how quickly we grew and how much manual entry it took, I would have said, "Let's get a software system five years ago." Because in the end, we paid for it anyway through payroll.



Aileen Mannion (09:57):

So when I was first doing the organic certification, we didn't have an ERP system. So everything is paper. And it can be really hard to do traceability when employees, you can't read sometimes their handwriting. <laugh> And also, if the entry is not accurate.

Ellen Rawley (10:17):

Do you want to take some of the key information from those paper records and put it into some sort of spreadsheet on your computer so you can more quickly track, say, lot codes?

Michael Gutschenritter (10:29):

I'm a huge fan of Google Sheets and the whole Google Suite. You have better data than just a quick glance at a piece of paper, which ends up getting colored on by the kids and coffee spilled on it. <laugh>

Amanda James-Martin (10:41):

So our recordkeeping system is all in Google Drive, which is super easy and can be shared with other people, which is awesome. It made the whole audit a breeze.

Genevieve Albers (10:52):

The amount of paperwork for just a single product to go from farm to shelf is staggering. A lot of things that used to be paper-based are now on like an iPad, and every step along the way is checked off on it's called Red Zone.

Sophia Miguel (11:11):

The person who is pulling that material will have their iPad, and they'll be able to pull up their truck inspection form, packing slip. They'll take pictures of all of the information, what the number of the truck is, when it arrived. And then we'll give this back. They opened a data sheet. Just letting you know. <laugh>

Amanda James-Martin (11:32):

Our vendor monitoring system is Document Compliance Network. We picked it out because it's very user-friendly, both for the people auditing the records, like us, and then also our growers and vendors when they're uploading documents. It's a lot easier than other systems that we've seen. So the other system that we use is Produce Pro, and we use that for more of our product-based paperwork. So it's going to be things like invoices, and BOLs, and those kinds of documents.

Zach Dowd (12:07):

We use NetSuite for scanning. It's RF Smart, an add-on that's just NetSuite related, that's for inventory management.



Lynne Haynor (12:14):

You could have a digital system, you could have a paper system, and they both are totally acceptable as long as they can be audited.

Zach Dowd (12:29):

I think once we hit that mark of a million dollars in sales, if we want to get to the next level, we have to update our systems. When we implemented this system, and especially with our scanning system, we were able to move 40% more product in this past year with the same amount of staff. This has allowed us to put all of our data together in one space, which makes it so much easier.

Debbie Byrne (12:53):

The labor-intensive part of certification has changed as we went online systems. Because before, we would do our mock recalls and we can do it, but it would take you two to three hours. You're going to the attic to pull all this paper. <laugh> So I think basically we made the decision to go online for traceability. It's faster.

Amanda James-Martin (13:19):

I know for us when we started and we were really, really small, the recordkeeping using like an Excel spreadsheet made perfect sense. And then as we grew, we needed to find a new solution for that. So I think just being open to change and being open to growing as your business grows. And I think the takeaway from that story is that the first thing that you try might not be the best thing, but don't be discouraged. There's still going to be a better thing down the road. You just have to keep trying and eventually you'll find the right fit.

Ellen Rawley (13:53):

When you get certified, you're going to say, "This is how we're going to operate to meet the certification requirements." But as you actually implement them, you're going to figure out that there are some things that aren't quite working, and there's some things that would work better. And a lot of times the ideas of what would work better can actually come directly from your staff. And then really driving home how crucial every person who touches ingredients, products, finished products, production is in terms of making sure those records are maintained. Congratulating the staff when they're doing a good job with the recordkeeping at staff trainings. If the organics inspection went really well and there was no corrective actions, that's like a celebratory moment and they go and they tell their staff about it. Having it be part of what is discussed, not just amongst management, not just for a marketing angle, but within operations from top to bottom.

Griffin Berger (14:56):

My staff and employees are trained and educated, that every single thing they do needs to be recorded and written down somewhere. You have to make people fill out the forms. You have to do it. It's just, it's what it is. You know, if you're not filling out the forms and you're not filling out the logs, then you got to get new staff. You got to do the work.



Genevieve Albers (15:17):

So anything in your process that is complicated or tricky, distill it. Figure, you know, break it down. Find out how to make it doable.



United States Department of Agriculture
Agricultural Marketing Service
National Organic Program



**ORGANIC
TRADE
ASSOCIATION**



Official Sponsor Organic Trade Association