



Draft Guidance

Commingling and Contamination Prevention in Organic Production and Handling

1. Purpose

This guidance document reiterates that management practices and physical barriers to prevent commingling and contamination of organic products with nonorganic products on split operations must be clearly described in the organic system plan (OSPs) of certified organic operations and verified by inspection by an accredited certifying agent (ACA).

2. Scope

This guidance applies to all ACAs and certified operations.

3. Background

NOP regulation §205.201 requires that the OSP contain a description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation. Protective practices to prevent organic products from contacting prohibited substances that could compromise the integrity of the organic products are required. The regulations do not require a specific section in the OSP for this item.

4. Policy

All ACAs are responsible for verifying that all certified operations have sufficient management practices in place to prevent the commingling and contamination of organic products with nonorganic products. The OSP should specifically address the operation's contamination and commingling risks and the preventative measures to ensure that contamination of organic product with prohibited substances and nonorganic product is avoided. ACAs can consider including a section in the OSP that allows producers to summarize their risks and preventative practices throughout their operation. This can include checklists and narrative questions that assist the producer in describing their contamination risks, and explaining their prevention practices.

During inspection, ACAs should assess the risks, and verify the adequacy and actual implementation of the described practices to ensure preventive commingling and contamination activities are carried out consistently. Preventive practices may include physical boundaries, separate manufacturing areas, clean-out procedures, or completely separate and different transportation or packaging systems.

5. References

§205.2 Terms defined.

Commingling. Physical contact between unpackaged organically produced and nonorganically produced agricultural products during production, processing, transportation, storage or handling, other than during the manufacture of a multi-ingredient product containing both types of ingredients.



Organic system plan. A plan of management of an organic production or handling operation that has been agreed to by the producer or handler and the certifying agent and that includes written plans concerning all aspects of agricultural production or handling described in the Act and the regulations in subpart C of this part.

Practice standard. The guidelines and requirements through which a production or handling operation implements a required component of its production or handling organic system plan. A practice standard includes a series of allowed and prohibited actions, materials, and conditions to establish a minimum level performance for planning, conducting, and maintaining a function such as livestock health care or facility pest management, essential to an organic operation.

Prohibited substance. A substance, the use of which in any aspect of organic production or handling is prohibited or not provided for in the Act or the regulations of this part.

§205.201 Organic production and handling system plan.

(a) ...*An organic production or handling system plan must include:*

- ...(5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and
- (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations....