

ANNUAL UPDATE SUBMISSION REQUIREMENTS:

- I. You must complete and submit the [ROR-601 Fee Payment Submission Form](#) whenever fee payment is submitted for the TDA Organic Certification Program (OCP). **The completed ROR-601 Form must be the first document in your annual update mail packet.** This allows for faster processing by TDA Licensing staff because they are able to quickly identify the purpose of your fee payment and what account the funds should be applied to.

- II. **ELECTRONIC SUBMISSION OPTION** - You now have an option to complete and submit an electronic copy of an Organic Supplier Summary Table rather than submit copies of organic certificates to verify the organic claim of each organic ingredient and single ingredient organic product that are currently certified by TDA. This table is sent to all operations with a current email address on file with TDA. Operations who submit an electronic copy of the Organic Supplier Summary Table must ensure it meets the guidelines of electronic document submission provided below. *See Guidelines for electronic submission below.*

- III. **UPDATING INFORMATION** - You are required to review the entire organic system plan form and supporting documentation (i.e. ingredient listings, product labels, facility diagrams, etc.) for your organic operation to determine what information must be updated and/or revised. **You are only required to submit those sections and forms that must be updated annually or revised to reflect the current handling practices of your operation.**

- IV. **REQUIRED UPDATES - Portions of the Organic System Plan form that must be updated by ALL handlers:**
 - a. Section A: Check the box for annual update and enter your facility's information.
 - b. Section B: Identify any sections that have been updated by marking the appropriate box(s). If no changes have been made, you may write out "no changes" or leave the section blank.
 - c. Affirmation Statement: The responsible party or other authorized person (e.g. primary contact for licensing matters) must complete by signing and dating in the appropriate locations.
 - d. Copies of organic certificates for all certified organic ingredients of new products or products where you are changing the formulation.
 - e. Operations may choose to submit copies of organic certificates or a completed copy of the Organic Supplier Summary table for organic ingredients and single ingredient organic products that are currently certified.
 - f. Copies of all applicable input labels not previously submitted.
 - g. Current copy of all health or safety license(s).

- V. **ADDITIONAL REQUIRED UPDATES FOR PROCESSORS** - In addition to the above documentation, processors adding/revising products must submit the following:
 - a. Section D: An updated listing of products manufactured and ingredients
 - b. Section I: Materials used
 - c. Section H: Product labeling (and copies of product labels for new product)

- VI. **ADDITIONAL REQUIRED UPDATES FOR DISTRIBUTORS** - In addition to the above documentation, distributors adding/revising products must submit the following:
 - a. ROR-602 Section F: Product labeling (and copies of product labels for new product)
 - b. ROR-602 Section G: Product information
 - c. ROR-602 Section H: Materials used

GUIDELINES FOR ELECTRONIC DOCUMENT SUBMISSION:

Please follow these two guidelines when submitting documentation electronically:

1. Send all electronic copies of documents to Organic@TexasAgriculture.gov.
TDA cannot guarantee receipt of documents sent to staff members' direct email addresses.

2. Make sure that total size of attachments is 8 megabytes (MB) or less per email. It may be necessary to submit multiple emails to ensure receipt.

FORM TITLES BY CERTIFICATION TYPE:

[Distributors: ROR-602 Distributor Organic System Plan](#)

[Fiber Processor: ROR-604 Processor \(Fiber\) Organic System Plan](#)

[Food and Feed Processors: ROR-606 Processor \(Food and Feed\) Organic System Plan](#)

[Retailer: ROR-608 Retailer Organic System Plan](#)

All current handler organic system plan forms have a “revision date” in the lower right corner of 1/01/2015. All forms are available on our website, www.TexasAgriculture.gov.

HEALTH AND SAFETY CERTIFICATES

In order to comply with [NOP Policy Memo 11-6, Reporting Health and Safety Violations](#), TDA requests that you submit copies of all current health and safety license(s) for your operation. To obtain clarification on the licensing status for your operation, please contact the Texas Department of State Health Services by calling 512-834-6626 or by sending an email to foodslicensinggroup@dshs.state.tx.us.

If you are not required to maintain any health and safety licenses, please provide one of the following forms of written documentation: (1) a signed letter, (2) email, or (3) phone log that details the agency contacted, the name and title of the representative who confirmed the exemption/exclusion from licensing, the phone number dialed and the date of correspondence.

HOW DO I RENEW MY ORGANIC CERTIFICATION?

STEP 1: Submission of fee payment and annual update documentation

In accordance with §205.406 of the NOP Regulations, certified operations are required to submit an updated organic system plan and fee payment annually. Per §18.702 of the Texas Organic Standards, late fees will be incurred by operations whose annual update documentation *and* fee payment is not received in our office by the identified due date.

Step 2: Initial Review Process

Once your fee payment and annual update documentation is received, TDA will conduct a review to verify that full fee payment was received and your Organic System Plan (OSP) is complete and in compliance with the NOP Regulations. If your OSP is found to be incomplete, TDA will contact you in writing to request the additional information. If additional information is requested, you must respond within the time period provided by supplying the additional information or documentation. If your response is not received within the provided time period and you do not contact TDA to request an extension, corrective action may be taken against your organic certification.

Step 3: Annual On-site Inspection

Once the initial review process is complete, your OSP will be forwarded to an inspector who will schedule and conduct your annual on-site inspection.

- Operations will not be inspected until full payment has been received. This includes any applicable late fees.
- An operation may be approved for inspection with pending items when the update OSP is only lacking minimal information. If your OSP is approved for inspection with pending items, you must have the requested information readily available for the inspector at the time of inspection.
- Operations must cooperate with the inspector to schedule the on-site inspection.
- An authorized representative who is knowledgeable about the operation must be available at all times during the inspection.
- Operations must have all records and documentation available at time of inspection and must provide access to all production or handling sites, including nonorganic production and handling sites.

Step 4: Final Review

Once the on-site inspection has been completed, TDA will conduct a final review of all documentation and make a certification decision.

- Operations must review the certification decision letter and updated certificate (if granted) for accuracy and report any discrepancies to TDA for review or correction.
- Operations must correct any identified areas of non-compliance, including additional requirements within a reasonable time period.

HOW TO SURRENDER YOUR ORGANIC CERTIFICATION:

If you no longer wish to have your operation certified organic by TDA, please complete and return the [ROR-625 Organic Certification Surrender Form](#). This form can be obtained from our website, www.TexasAgriculture.gov, or you can request a copy by contacting our office.

GUIDANCE ON ADDING NEW PRODUCTS AND/OR PRODUCT LABELS DURING ANNUAL UPDATE OR AS A MID-YEAR CHANGE:

1. Complete a ROR-601 Fee payment form.
 2. Update the applicable sections and any supporting documents of your OSP and color copy of the product label(s) to be reviewed. (Processors must update Section D in order for any new products to be added to the organic certificate.)
 3. Compile all supporting documents such as organic certificates for ingredients, specification sheets for nonorganic ingredients, NOP Import certificates if you are importing organic product from another country.
 4. Submit all forms, documents, and full fee payment to TDA. While you may email the documentation, TDA cannot review the new products and/or new product labels until all applicable fees have been received.
- **New products must be submitted at least 60 days prior to the launch date. TDA recommends 90 days if you plan to launch during March, April, or May.**
 - **New product labels must be submitted at least 1 month prior to the print date or launch date.**

NEW OUTREACH AND EDUCATION INFORMATION IS AVAILABLE TO YOU!

TDA encourages you to watch a short video on organic integrity in the supply chain that was created by the USDA National Organic Program. This video reviews the responsibilities of organic handlers in verifying that organic imports comply with the U.S. standards. This video was published on April 6, 2017.

<https://www.youtube.com/watch?v=Fi5671MWVNk&feature=youtu.be>

Once you watch the above video, please watch the following half hour training module that reviews the organic control system and key requirements related to organic system plans, inspections, and recordkeeping. This training module was published on May 11, 2017 and *implementation of the information provided in this training module will have a direct impact on the quality of your organic system plan, your operation's ability to keep complete and auditable records, and the efficiency of organic inspections conducted at your operation.*

<https://www.youtube.com/watch?v=vTUlkw314g>

PROGRAM STAFF:

The OCP staff is ready to assist you with questions or concerns you may have about the annual update process.

Phone: 512-936-4178

Email: Organic@TexasAgriculture.gov