

2024 TDA ORGANIC HANDLER ANNUAL UPDATE GUIDANCE

ANNUAL UPDATE SUBMISSION REQUIREMENTS

Items that are still MAILED:

Payment- you will still mail the payment to the address below. Please complete and submit the ROR-601 in the system, but you will also print the document out to mail with your payment. Only check, cashier's check, or money order is accepted, and make payment out to Texas Department of Agriculture. Place check and ROR-601 at the top of any other mailed documentation.

**Texas Department of Agriculture,
Organic Certification Program
P.O. Box 12077
Austin, TX 78711**

Items that are still E-MAILED:

Operations are required to review their organic system plan form and supporting documentation (i.e. facility diagrams, flow charts, material/input information, state health licenses, labels, procedures, etc.) to determine what updated information must be submitted. These documents should be emailed to program at organic@texasagriculture.gov. If mailed, you must keep original copies for yourself.

Logging Into Your Field2Base Account:

Instructions for the login process and navigating the system in general are attached with your renewal email. Here is the direct link <https://admin.field2base.com/>, you may click "forgot password" and reset your password if needed. The company ID will always be 4178 (see instructions for pictures and descriptions), and your username will be the email associated with your account with us. Please do not submit individual forms through Field2Base until you are ready to submit all other applicable supporting documents and payment.

You will locate your most recent ROR-605 (this could have been completed during last year's renewal, possibly during your inspection, or during your final review) under the Sent tab of Field2Base. Click to Quick Copy the most recent ROR-605. If you have questions on this process, the attached instructions describe the steps on Page 7. Please contact program staff directly, if you need further assistance.

1. Please review your full ROR-605 form to ensure all answers are still completed, and the information is still accurate. On the 1st page, there is a navigation box where you can choose the section you would like to move to directly. After you choose the section in the dropdown you will click the gray box "Go to ROR-605 Section".
2. The system automatically saves the form as you progress as long as you are connected to the internet. You will consistently see a red box in the lower right corner that states "Unsaved Changes", and about every 10 seconds you will see the box transition to a blue pop-up box that states "Saving", then a green pop-up box that states, "Changes saved to the server".
3. In addition to the automatic save feature, you can also go to Actions, and choose Save Draft as well.
4. To send the completed form you will choose Ready for Review at the bottom of the Home page (page 1), then press Submit. Once you submit any form it will move the completed form into the Sent tab. You can download PDF versions of all forms in this section.

In your Field2Base account, you should not have any unfinished forms under your Drafts tab or My Work tab. Unless you have been actively working on updates prior to your renewal, any forms should be deleted to reduce confusion. If you have questions, please feel free to reach out to us and make sure, but most likely the forms were opened, but not deleted.

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ROR- FORM UPDATES

ROR-601 Organic Fee Submission Form (do not complete the ROR-600 for renewals): Form is required annually. The ROR-601 Fee Payment Form will automatically calculate your fees based on the information you provide. As mentioned above, you complete and submit this form in the new system, but you will still need to mail this form along with payment to the address below.

When you have finished your entries in the form, in the top right corner there is a gray button “Actions” which has the options to Send Form, Save Draft, Save PDF, and Delete Draft.

Please select “Send Form” which will submit the form directly to Program.

You have two options for printing the form:

1. A completed forms will appear under WebApp in the tab “Sent Forms.” Here you can click PDF to download the form to print.
2. You will also receive an automated email which will have the PDF attached to print. Either option is fine.
3. Note: This is the ONLY form your will receive a curtesy email with an attachment. Completed forms can always be found under your Sent tab.

ROR-605 Organic System Plan sections that are required to be updated yearly:

Form is required annually.

Section R: Update all supplier information that is applicable to your operation.

Section W: Update any nonorganic ingredient search information (only if applicable).

All other sections must be reviewed for accuracy.

ROR-605a Multi-Ingredient Products:

Form is required only if your formulations remain unchanged, you do not need to resubmit this document.

Please review the most recent ROR-605a under your Sent tab to ensure the information is accurate.

ROR-605b Nonorganic Ingredient Declaration:

Form is required only if directed by Program staff. You will complete this form if you use allowed nonorganic ingredients in Organic products. Declarations are accepted for two years after the date of signature, as long as the formulation has not changed.

You will still be required to provide product composition information to confirm the information on this form.

ROR-605c Natural Flavor Product Questionnaire:

Form is required only if directed by Program staff. You will complete this form if you use allowed natural flavors that are not certified organic due to commercial availability. Declarations are accepted for two years after the date of signature, as long as the formulation has not changed.

You will still be required to provide product composition information to confirm the information on this form.

ROR-605d Declaration for Nutrient Vitamins and Minerals:

Form is required only if directed by Program staff. You will complete this form if you use allowed vitamins and/or minerals in Organic products. Declarations are accepted for two years after the date of signature, as long as the formulation has not changed.

You will still be required to provide product composition information to confirm the information on this form.

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[ROR-605f Organic Fraud Prevention Plan:](#)

***NEW* Form is required. All operations are required to submit the new ROR-605F Organic Fraud Prevention Form, see below for more information. Form located in Field2Base, under the Blank tab. Review the instructions and overview in the form to understand the task more completely.**

The new Strengthening Organic Enforcement rule (SOE) implemented many changes to the regulations to strengthen the chain of organic production and handling to ensure the integrity of the product is maintained. In 2022 and 2023, TDA required the submission of Monitoring Practices and Procedures in order to comply with the regulation §205.201(a)(3). Most operations did not need to submit a separate document, as these monitoring practices are within existing operating procedures. However, this rule has been updated to add the requirement:

“This must include a description of the monitoring practices and procedures to verify suppliers in the supply chain and organic status of agricultural products received, and to prevent organic fraud, as appropriate to the certified operation's activities, scope, and complexity.”

This is now commonly being referred to as an ‘Organic Fraud Prevention Plan’. The definition of Organic Fraud was also added to the regulations (NOP §205.2):

“Organic Fraud- Deceptive representation, sale, or labeling of non-organic agricultural products or ingredients as “100% Organic”, “Organic”, or “Made with Organic (specified ingredients or food group(s)).”

[ROR-605e Exempt, Uncertified Handler Affidavit:](#)

***NEW* Form may be required. Form located in Field2Base.**

Under SOE, the definition of handling was updated, and subsequently many types of operations that were previously exempt from operation, now require certification. Most brokers, traders, wholesalers, distributors, importers, brand owners, and storage facilities are considered handlers per NOP § 205.2 “Handle” and “Handler”. Exemptions from certification requirements are outlined in NOP § 205.101.

***** If your operation utilizes an uncertified handler, that is claiming exemption, the ROR-605E will be required to be completed by a qualified individual employed by the supplier. This form will be ready to use on April 1, 2024.**

[ROR-610 International Trade Review Request:](#)

Form is required annually. If you currently import or export any organic product, you will need to Quick Copy and update this form (this is a signature required form). Please be advised it is a \$75 fee for EACH country required a trade agreement. The United States facilitates trade with many other trading partners. This opens new markets and provides diversity for consumers. In order to export products to countries the United States has a trade arrangement with, the appropriate equivalency must be identified on your organic certificate. The USDA currently has organic equivalence with the following governments: Canada, European Union, Japan, Korea, Switzerland, Taiwan, and the United Kingdom. All imports and exports must be identified in the ROR-610 International Trade Form, and you must include the appropriate fee yearly for the international trade agreement review fee. The fee is 75.00 for each trade agreement review that must be conducted by TDA, which can be found in Section H of the ROR-601 Fee Payment Forms.

[ROR-613 Product Label Review Questionnaire:](#)

Form is required only if you are submitting label revisions or new labels to be reviewed by Program. Clear digital, color label files must be submitted in order to verify all required information.

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ROR-625 Surrender of Certification:

Form is required only if you no longer wish to continue your organic certification. TDA can assist you with this process.

R-002 Change of Information:

Only complete this document if you need to update contact information, emails, phone numbers, facility name or address. Certain changes may require a change of ownership, so if you have questions, please contact us.

Other documents that are required to be updated

(this quickens the initial review process, otherwise it will be requested):

1. Most recent OMRI certificates for approved materials, or direction to exact product listing approval under WSDA or CDFA. You may easily search your product here: <https://www.omri.org/> and download the certificate of the exact product. This is important to understand, because some products have restrictions for use listed, and you must abide by those as well. For example, a sanitizer may have the restriction “May be used as a sanitizer on food contact surfaces. Use in wash and/or rinse water must comply with FDA limitations.” In this case the restriction requires an FDA requirement which would need to be identified in your operating procedures on file with TDA.
2. Most recent applicable state health licenses.
3. Any other documents that you deem necessary to show compliance with the NOP regulations.

Adding new products?

If you have a new product planned, below are the items to submit:

1. Update your ROR-605 in all applicable sections (receiving, packaging, suppliers, nonorganic ingredients).
2. Update your ROR-605a (if a multi-ingredient product)
3. Submit the proposed label(s) for review.
4. Submit appropriate organic certificates for all organic ingredients.
5. Submit appropriate ROR forms for additional nonorganic ingredients, along with appropriate product composition documents.
6. Add appropriate fees to ROR-601 for the label template and multi-ingredient formulation (if applicable).
7. TDA may ask for additional documentation.

What are the exact stages of renewing my organic certification?

Step 1: Submission of annual update and certification fee payment

In accordance with §205.406 of the National Organic Program (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 that fail to submit all required annual update documents and fee payment by the identified due date.

Step 2: Initial Review Process

Once your fee payment and annual update documentation are received, TDA will conduct a review to verify that full fee payment was received, and your Organic System Plan (OSP) is complete and appears to be 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, corrective action and additional fees may be applied to your organic certification. Per NOP 2603 3.4 Updated certificates may be issued after reviewing the annual update or after the annual inspection is completed.

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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.

- During your inspection, the inspector will verify the accuracy of your organic system plan(s), view your facility, equipment, storage, ingredients, packaging, and verify that your record keeping system is complete in accordance with the National Organic Program.
- 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 and perform all duties associated with 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.
- Alternatively, your operation may be subject to an unannounced inspection at this point as well.

Step 4: Final Review

Once the on-site inspection has been completed, TDA will conduct a final review of all documentation and notify your operation of the findings.

- Operations must correct any identified areas of non-compliance, including additional requirements, and you must respond within the time period provided or further corrective actions and additional fees may be applied to your organic certification.

Educational Resources:

NOP provides training courses in the Organic Integrity Learning Center on a variety of topics to understand organic certification, as well as new rules changes such as SOE (Strengthening Organic Enforcement), OOL (Origin of Livestock), OLPS (Organic Livestock and Poultry Standards). There are many great courses you may be interested in, and could provide insight as to why TDA requires specific information.

Here is the link to the NOP website with all of the information to register:

<https://www.ams.usda.gov/services/organic-certification/training>

This is the specific link to register for an account:

<https://usda.genuiussis.com/PublicStudentSignUp.aspx?AffiliateID=46BOCO>

More information on nonorganic ingredients:

Can I use non-organic ingredients in my product? Yes, in certain cases with specific documentation. The USDA National Organic Program allows for a limited number of [non-organic ingredients](#) to be used in organic labeled products, if the:

1. Ingredient is a listed, acceptable commercially non-available restricted ingredient
2. Ingredient was not produced using organic [excluded methods](#)
3. Ingredient is allowed per the [National List](#)

What records do I need for allowable non-organic ingredients?

1. To start, submit all non-organic ingredients to TDA for approval prior to use, including the manufacturer's full list of ingredients and/or processing aids that went into creating the ingredient.
2. You must also submit the ROR-605b Nonorganic Ingredient Declaration to ensure the ingredient was not produced using organic excluded methods.
3. A few exceptions include:

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- a. If your non-organic ingredient has commercial availability restrictions...
 - i. You will need to demonstrate an organic version is unavailable through the completion of Section W in the ROR-605 form.
- b. If your non-organic ingredient is a natural flavor...
 - i. You must submit the ROR-605c Natural Flavor Questionnaire (below), and verify it is produced using only approved methods or following restrictions per the organic requirements.
- c. If your non-organic ingredient is a multi-ingredient product (e.g., vitamins)...
 - i. You must submit a manufacturer specification sheet listing all ingredients found in the ingredient, as well as any processing methods used to produce it.
- d. Declarations are accepted for two years after the date of signature, as long as the formulation has not changed.