



Operation Name: _____ Date: _____

An "Audit Trail" or "trace-back" system documents the source, transfer of ownership, receipt, handling, production, processing, and transportation of OCal products. Records must disclose all activities and transactions in enough detail to be readily understood and audited. Records must show compliance with organic requirements and be kept for at least five (5) years.

► Complete a separate [OCal H5.0 Record Keeping for Handlers](#) for each process or product when different record keeping systems are used.

Facility, product and/or process covered by this plan:

A. Location of Records

Location where your OCal product records can be reviewed during inspection.

Address: _____

City: _____ State/Province: _____ Zip/Postal Code: _____ Country: _____

Contact(name/title): _____

Phone: _____ Fax: _____ Email(s): _____

B. Tracking OCal Products

Your audit trail records and documents must identify products as OCal and ingredients as organic and/or OCal. Work with your suppliers to ensure that their documents also indicate organic and/or OCal status.

1) Describe or attach a diagram of how your audit trail/trace-back system tracks finished products from inbound receiving through production or packing to final outbound shipping or invoice. Description or diagram attached

Audit trail systems include the following elements:

- a) **Common audit trail documents** – Bills of Lading (BOL), purchase orders, invoices, contracts, packing slips, certificate of analyses, organic import records, product specification sheets, receiving logs, inventory logs, batch records, manifests, transaction certificates, shipping and delivery records (weigh tickets, scale tickets, receipts, tags), chain of custody, truck and trailer numbers, clean truck affidavits.
- b) **Uncertified suppliers** – Additional audit trail information is required for each shipment from an uncertified handler (broker, trader, wholesaler, distributor, or importer), for OCal cannabis ingredients from uncertified handlers, refer to the [OCal Uncertified Handler Affidavit \(OCal UHA\)](#). For organic non-cannabis ingredients from uncertified handlers, refer to the [Exempt Handler Affidavit \(EHA\)](#). Receiving procedures must include verification and documentation of the last certified operation. *Sourcing from uncertified handlers requires additional audit trail verification at inspection.*
- c) **Imports** (organic ingredients only)– Importers and operations who are the first certified organic business in the USA to purchase or receive imported goods are required to have additional documentation showing that imported organic products have not been treated upon entry to the USA.
 - o Shipments from EU, UK, Japan, Korea, Taiwan, and Switzerland – NOP import certificate issued by an organic certification agency are required for each shipment.
 - o Shipments from India – Certificate of Inspection issued by an organic certification agency via India's APEDA [TraceNet](#) system is required for each shipment.
 - o Additional documentation for each shipment may include import permits, phytosanitary certificates, transaction certificates, NOP Import certificates, CBP Forms 3461 and 7501, commercial invoices, export packing list, Certificate of Origin, Bill of Lading, Waybills/Air Waybills, AMS Inspection Certificate, Charter Party, Marine Surveyor report (for bulk vessel shipments) and other documents.

2) Attach sample audit trail documents to demonstrate your system. Documents attached

3) Describe the records and system you use to track inventory of ingredients and products (in/out balance). You may attach sample documents to illustrate, e.g. monthly log of beginning and ending inventory.

CCOF inspectors will verify that you received sufficient organic ingredients, OCal cannabis, or OCal cannabis products to account for final production, sale, or transportation of OCal.



C. Lot Numbering Not applicable

1) Describe your lot numbering system for finished products or attach a description.

EXAMPLE: **Lot Number:** 0123A045

Code	0	123	A	O	45
Signifies	Year: 2000	Julian date :production	Shift	Organic	Plant location

Lot Number: _____

Code						
Signifies						

2) How is lot number associated with outgoing shipments?

- On invoice or Bill of Lading
 On a "pick list" or "ship list"
 Other (describe):
