Great resources exist\textsuperscript{1} to ensure that retailers are maintaining organic integrity, but there is less information available related to maintaining the integrity of organic products while they're in transit.

Both producers and distributors need to be aware of the potential risks to organic integrity that transportation poses, as well as the strategies for reducing these risks. In addition, it is vital that both parties are clear on who is responsible for organic integrity and when.

ACORN has created this resource to provide some guidance in this area, but it is important to note that this resource is most relevant to small-scale distribution with mixed organic and non-organic loads, which is how a lot of organic product is moved around in the region, but is less useful to grains or processed products, for which segregation or more complex traceability systems are already in place.

The Key Principles of Organic Integrity

\textit{Commingling} occurs when visually indistinguishable organic product comes in contact with non-organic product. For example, a shipment of organic and non-organic potatoes could easily result in some non-organic product getting mixed in with the organic if precautions are not taken.

\textit{Contamination} refers to an organic product coming in contact with a prohibited substance, such as a cleaning product or pesticide residue. This contact can be direct (an accidental spill) or indirect (non-organic product residues on boxes).

\textit{Record Keeping} is central to the entire organic system and enables organic integrity to be demonstrated at every stage along the way. There are a range of records to keep in relation to distribution detailed in the next pages.

Ownership is what dictates who is responsible for organic integrity. The point at which ownership changes varies depending on the circumstances of product sale and delivery.

For instance, if a distributor is contracted to deliver goods to their next destination, they do not typically take over ownership of the product, meaning the organic producer is responsible for organic integrity while their product is in transit to the buyer.

If the buyer of the goods coordinates the shipping of the product or is picking the product up from farmgate, then at that point the buyer is most likely responsible for maintaining organic integrity as they would be in their retail store.

Determining Risk
The chart below shows level of risk in various transportation scenarios. For example, if a load contains only vegetables from multiple organic producers, then there is minimal concern for organic integrity. If the load contains vegetables from organic and non-organic producers, this is not likely to be allowed unless it can be clearly demonstrated that risks to organic integrity have been mitigated.

<table>
<thead>
<tr>
<th></th>
<th>Organic</th>
<th>Non-organic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Similar product</td>
<td>Low risk</td>
<td>Highest risk*</td>
</tr>
<tr>
<td>Different product</td>
<td>Low risk</td>
<td>Medium risk</td>
</tr>
</tbody>
</table>

*Only possible if there is completely sealed packaging and clear labeling
Mitigating Risks

- Consider methods to keep the organic product identified: sealed containers labelled organic (use different colour/type), lot numbering, packing list/inventory, labelled bags/bunches.

- Consider methods to keep organic product separate and uncontaminated by residues: Separate sections of the delivery vehicle (front/back), solid containers (no holes), sealed lids on boxes or wrapped pallets. Watch out for meltwater or seepage (i.e. ice-packed vegetables). Residues can come from the non-organic produce or from pesticide-treated boxes.

- If you are transporting mixed organic and non-organic loads with similar products often and dealing with open boxes or crates, consider either getting containers with covers for your own business or requiring it of producers you are shipping for.

- Develop procedures for managing spills and leaks in transit. These could pose contamination threats to organic products. Ensure staff are well-trained on the above procedures.
Considerations for Producers

- Have a conversation with whomever is distributing your products about organic integrity and ensure you have all the information you need. What other products will be shipped with your products? What procedures do they have in place to prevent spills and what is the process for cleaning up spills if they occur?

- While point-of-sale packaging can be quite an expense, it can ensure not only that your product is protected in transit, but also in storage and on display at retail locations.

- Smaller farmers or buyers may truck their produce together with uncertified neighbours. Depending on the certifier, this may be acceptable but is only possible if the organic produce can be clearly identified and kept completely segregated from conventional produce. Consider the risk to your consumer in these situations: is it worth potentially contaminating your organic product?

- As always, if you have concerns or questions related to organic compliance, you should contact your certifier.

Considerations for Distributors

In order to ensure that the organic product you are transporting is indeed still organic when it arrives at its final destination, you have a responsibility to maintain the organic integrity of these products. This is important for a couple reasons:

- The Canada Organic Standard (Section 8.5.1) states that "Every measure shall be taken to ensure that the integrity of organic products is not compromised during transportation. Products shall be physically segregated or protected to avoid possible commingling or substitution of contents with non-organic products."

- While most distributors and retailers are not certified organic, whichever customer you are delivering organic goods to is expecting they will have organic goods to sell to their customers. Maintaining organic integrity is maintaining your customers' trust and confidence!
Records are an integral aspect of the organic system and are what allow organic integrity to be demonstrated at each point of the organic value chain. Organic producers may require you to complete some additional paperwork so that they may prove during their organic inspection that no threats to organic integrity were posed during transportation of their goods.

Although certification is not required, if you are transporting organic goods with frequency, you may need to complete an Attestation of Compliance - this is a process similar to certification where a Certification Body (CB) verifies that the service you are providing to organic farmers (transportation and distribution) meets the Canadian Organic Standards and Regulations.

In the instance where you may be shipping fewer organic products, a Memorandum of Understanding for Contractual Services would be more appropriate than the Attestation of Compliance. The organic producer whose goods you are transporting would require you to complete a questionnaire detailing how the organic integrity of their products would be ensured.

Documents to Demonstrate Traceability

The paper trail is what allows the state of organic integrity to be assessed, so records are critical to this process. In addition to those mentioned above, some that may be useful include:

- Purchase invoice and/or receipts
- Contracts
- Copy of producer's organic certificate and/or transaction certificate (examples from Ecocert and OCIA)
- Bill of lading or other documentation showing transfer of custody of the product from buyer to seller, complete with producer's lot number (examples from OCIA and Procert)
- Transportation Cleaning Affidavit (examples from Ecocert, OCIA, and Procert)