



**PROCESSOR/HANDLER  
APPLICATION & CONTRACT  
FOR ORGANIC CERTIFICATION**

Some retailers/handlers may be exempt from all or part of the USDA-NOP.

FOR OFFICE USE ONLY  
Received: / / Reg. #  
Retainer Fee: \$

**This application is designed for certification to the Canadian Organic Standards (Can/CGSB 32.310 & 32.311), the EEC Organic Regulation #834/07 & 889/08, the Quebec Organic Reference Standards and the USDA National Organic Program (NOP).** [If you wish to be certified to the USDA NOP only, request and complete Doc # 6.2.1-NOP.] This document is both an application and contract for certification services and record of your **initial** organic processing/handling system plan as required by the COS, the EEC and the NOP. Changes in your processing/handling plan will be recorded in an annual extension application and contract. If you are also involved in organic crop production request and complete Doc # 5.2.1 (or 5.2.1-NOP for NOP only). **Before completion**, make extra copies of the diagrams and attachments to this document. Save the original copies as "Masters" for future duplication. **After completion, make a photocopy of the entire Application and Contract and retain in your file.**

**1.0 APPLICANT INFORMATION [NOP 205.201]**

Name: \_\_\_\_\_ Year: \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_  
 Plant Location(s): \_\_\_\_\_  
 Phone No: (\_\_\_\_\_) \_\_\_\_\_ Fax No: (\_\_\_\_\_) \_\_\_\_\_  
 Email: \_\_\_\_\_ Website: \_\_\_\_\_  
 If a corporation, the authorized representative is \_\_\_\_\_, address: \_\_\_\_\_  
 \_\_\_\_\_ Phone No: (\_\_\_\_\_) \_\_\_\_\_

**1.1 Certification Instructions**

Please indicate which standard/regulation you wish to be certified to:

- |   |   |
|---|---|
| <input type="checkbox"/> EEC Reg. 834/07 & 889/08           | <input type="checkbox"/> Canadian Organic Standard (COSs) (Can/CGSB 32.310 & 311) |
| <input type="checkbox"/> Japan Agricultural Standard        | <input type="checkbox"/> USDA National Organic Program (NOP) Regulation           |
| <input type="checkbox"/> Quebec Organic Reference Standards | <input type="checkbox"/> USDA NOP Only  |
| <input type="checkbox"/> Bio-Suisse                         | <input type="checkbox"/> Other: (Specify):  |

**1.2 Nature of Business**

Generally describe the organic (and non-organic) food processing activities:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

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**1.3 Organic Product Description**

List the organic products, brand names and package sizes and type created in this facility and the approximate annual volume:

Product	Brand Name	Size and Type	Annual Volume
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Any additions to the organic product/brand name line above constitutes a change in the scope of certification and requires partial or total re-evaluation.

**1.4 Market Area:**

List the countries into which you expect to export organic food:

_____	_____
_____	_____
_____	_____
_____	_____

**2.0 ORGANIC CERTIFICATION HISTORY [NOP 205.401(c)]**

Describe the organic certification application and results for your facility under the following headings:

Certification Body Applied to	Certification Application Year	Application Results
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Has organic certification ever been denied or withdrawn?  Yes  No  
 If Yes, state the reason and attach a copy of the notification of denial or withdrawal: \_\_\_\_\_

Were there any non-compliances identified in these certifications  Yes  No.  
 If Yes, list the non-compliances and the corrective actions taken:

Non-compliance	Corrective Action(s)
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

**Attach** copies of the Organic Certificate of Conformity, letter of transmittal and inspection report for the **most recent** certification event.

**3.0 PROCESSING/HANDLING FACILITY DESCRIPTION [NOP 205.201]**

For each of the geographically separate plant sites in your organic facility provide the following information:

**3.1 Site Diagram(s):**

A reasonably accurate sketch of each site including (i) location and name of each building and improvement (ii) road and/or truck access (iii) adjacent property use.

**3.2 Plant Diagram(s):**

An accurate representation of each plant component indicating the name and position of each machine/instrument.

**3.3 Flow Diagram(s)**

A conceptual diagram of each product stream or group of streams within each plant.

**3.4 Organic Dedication:** [NOP 205.272(a)]

Is non-organic produce processed in this facility?  Yes  No.

(i) If YES, what is the nature of the non-organic processing activity: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(ii) Describe cleaning and purging procedures between organic and non-organic runs: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(iii) Describe segregation of non-organic and organic products during handling, storage and transportation: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**3.5 Contamination [NOP 205.272]**

Describe the procedures used to prevent contact of organic products with prohibited substances and sanitizing agents: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**4.0 STANDARD OPERATING PROCEDURES [NOP 205.201]**

A copy of the SOP Manual must be available for inspector review.

When was the SOP Manual last revised? \_\_\_\_\_

If a SOP manual does not exist, what initiatives have been taken for creation of the same and what is the timetable for generation? \_\_\_\_\_

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**5.0 ORGANIC INGREDIENT CERTIFICATION RECORDS [NOP 205.201(a)(2)]**

A continuously up-dated schedule of the certification status of all organic ingredient suppliers must be maintained. The following format and headings are recommended:

Schedule of Organic Suppliers and Certification Status						Revision Date:			
Supplier			Certifying Body		Certification Status		Renewal Status Check		Further Action(s) Required
Name	Address	Country	Name	Accreditation	Cert on File.	Expiry	Date of Inquiry	Status	

**Note:** All suppliers must bear certification appropriate for the jurisdiction and/or status the finished product is to be sold to (eg. all suppliers for a product sold as EU compliant must also bear a current EU certificate)

Have current copies of all supplier organic certificates been collected?  Yes  No  
 Are certificates appropriate for the jurisdiction/certification status of the final product?  Yes  No

**Attach** a copy of the most recent version of the above schedule. Attach copies of the Certificates of Conformity for the suppliers listed in the schedule. If suppliers are primary producers, have the certificates available for review by the inspector.

**6.0 EXTERNAL REGULATION AND INSPECTION [NOP Additional Information]**

**6.1 Government Agencies**

List and briefly describe the nature of Federal and Provincial (State) licenses which are required for your plant.

Government Agency	Protocol	Date of Last Inspection
_____	_____	_____
_____	_____	_____
_____	_____	_____

**6.2 Non-government Agencies**

Indicate the nature of non-government external inspection/accreditation used: (eg. ISO HACCP, AIB)

Agency	Protocol	Date of Last Inspection
_____	_____	_____
_____	_____	_____
_____	_____	_____

Describe any non-compliances identified in the last inspection by the above agencies and the remedial actions taken:

Non-Compliance	Remedial Action Taken
_____	_____
_____	_____
_____	_____
_____	_____

Are there any outstanding remedial actions arising from these inspections?  Yes  No. If **YES**, describe \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**7.0 PROCESSING PROCEDURES** [NOP 205.201(a)(1)]

Indicate the nature of the on-farm processing activities:  cleaning  grading  cooking  freezing  
 packaging  baking  curing  drying  mixing  grinding  churning  separating  
 distilling  extracting  slaughtering  cutting  fermenting  packaging  eviscerating  
 jarring  labeling  other (specify) \_\_\_\_\_

For **each product** or **product group** listed in Section 1.3, complete a copy of Schedule 7.1 – **Organic Product Profile**.

**8.0 PRODUCT INVENTORY CONTROL** [NOP 205.201(a) (4)]

Describe your product inventory control (audit trail) system. **Attach** a flow diagram to demonstrate product identity maintenance and attach copies of documents used in the process:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

When purchasing organic raw materials or ingredients do you:

- (i) obtain copies of organic certificates **before** taking delivery?  Yes  No  
 (ii) Assign or record lot & batch numbers?  Yes  No  
 Provide an example: \_\_\_\_\_

Can the contents of the finished product from a retail shelf be traced to the original farm source?  Yes  No  
 Can ingredient lots be traced to their final use?  Yes  No

**9.0 PRODUCT LABELLING** [NOP 205.303 to 310]

Do the individual finished product labels on the principle display panel and side panels conform with the country, province or state on which the products will be marketed?  Yes  No

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Attach** copies of the principle and side panel labels for each product in the organic line to Schedule 7.1.  
**Attach** copies of the advertising material, scripts etc. to Schedule 7.1.

**10.0 WATER QUALITY MONITORING**

Indicate the water source(s) for the facility(s):  treated municipal  untreated river, stream or lake  treated well  
 untreated well  Other (Specify): \_\_\_\_\_

What treatment(s) are applied to water? \_\_\_\_\_  
 \_\_\_\_\_

List known contaminants in water supplies in the area: \_\_\_\_\_  
 \_\_\_\_\_

Indicate the water quality factors which you monitor:  pH (reaction)  electrical conductivity  total dissolved solid (TDS)  Na  Ca  Mg  Cl  SO<sub>4</sub>  NO<sub>3</sub>  insecticide scan  fungicide scan  E. Coli  bacteria scan  Other (specify): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

How often is the water tested?  daily  weekly  monthly  other (specify) \_\_\_\_\_

What are the academic qualifications of the water quality data analyst?  B.Sc. In Microbiology  B. Sc. In Chemistry  B.Sc. in Toxicology  Other (specify) \_\_\_\_\_

**Attach** the current Certificate of Accreditation for the testing laboratory (ISO 17025)

If steam is used in processing, list the chemicals used and frequency of testing for residues in steam condensate:

daily  weekly  after boiler cleaning  Other (specify) \_\_\_\_\_

The water quality data file must be available for inspector review.

**11.0 COMPLAINTS AND CORRECTIVE ACTIONS [ISO 65]**

Describe the procedures used to receive, acknowledge and record complaints regarding organic integrity of products generated by the facility.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

List the names of complainants in the last 12 months, the nature of their complaint and the remedial action taken.

Complainant	Nature of Complaint	Remedial Action
_____	_____	_____
_____	_____	_____
_____	_____	_____

The complaint file(s) must be available for inspector review

**12.0 SANITATION PRACTICES [NOP 205.272]**

Indicate procedures taken to clean equipment  compressed air  pressure washer  brooms/brushes  flushing  vacuum  rinsing  clean in place (CIP)  other (specify) \_\_\_\_\_

\_\_\_\_\_

List and describe **all** agents used in facility and equipment sanitation:

Sanitizing Agent	Source	Composition
_____	_____	_____
_____	_____	_____
_____	_____	_____

**Attach** copies of labels and MSDS of **all** sanitation agents used.

How frequently are facilities cleaned:  daily  weekly  monthly  yearly  as required

other (specify) \_\_\_\_\_

A log of all sanitation activities **must** be maintained.

### 13.0 FACILITY PEST MANAGEMENT [NOP 205.271]

The pest management practices used in organic produce storage and handling buildings and facilities involve the following:

- removal of pest habitat, food sources and breeding areas
- prevention of access to handling facilities
- management of environmental factors, such as temperature, light, humidity, atmosphere and air circulation to prevent pest reproduction
- mechanical or physical controls including but not limited to traps, light or sound
- lures and repellents using nonsynthetic or synthetic substances consistent with the lists of permitted substances
- mechanical traps
- sound emitters
- lures (specify) \_\_\_\_\_
- repellent (specify) \_\_\_\_\_
- poison stations (specify) \_\_\_\_\_
- predators (specify) \_\_\_\_\_
- other (specify) \_\_\_\_\_

How often are the pest management devices monitored:  daily  weekly  monthly  yearly  as required  
 other (specify) \_\_\_\_\_

Monitoring events **must** be recorded in a Pest Control Log.

List the substances used or to be use in organic facility pest management:

Substance	Purpose	Composition	Source	Application	
				Rate	Frequency
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

**Attach** the following documents:

- Pest control/site maps;
- Label and MSDS for all pest control products used;
- The 2 most recent pest control reports.

### 14.0 RECORD KEEPING SYSTEM [NOP 205.103]

The following documents are used and maintained for at least **five years** to preserve product history and identity. Some are maintained and updated on a continuous basis, e.g. flow diagrams:

- Site Diagram(s)
- Facility Diagram(s)
- Flow Diagram(s)
- Labels of all ingredients and substances used in the facility
  - a. searches for organic ingredients
  - b. monitoring activities
  - c. equipment sanitation events
  - d. facility sanitation events
  - e. storage activities
  - f. product movement/shipping activities
  - g. pest management activities
- Documentation of organic ingredients, sources

- Schedule of Supplier Certification Stati
- Independent Laboratory test results:
  - a. washing water quality
  - b. potable water quality
  - c. pesticide and transgenetic DNA analysis residue analysis
  - d. ingredients
  - e. raw materials
  - f. boiler water
- Labor Records
- Transportation Sanitation Affidavits
- Sales Records
- Other (specify) \_\_\_\_\_

Has a 5 year record archive been established?  Yes  No

**15.0 WASTE MANAGEMENT** [NOP Additional Information]

Solid waste management: \_\_\_\_\_

Liquid waste management: \_\_\_\_\_

Gas waste management: \_\_\_\_\_

Describe Recycling Activities: \_\_\_\_\_

**16.0 EMPLOYEE TRAINING** [NOP Additional Information]

Describe your employee organic training procedures including seminars, staff meetings, etc. or give applicable SOP manual section reference.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**17.0 CONTRACT FOR CERTIFICATION SERVICES**

(a) It is hereby agreed that \_\_\_\_\_ (hereinafter called the Applicant) retains **Pro-Cert Organic Systems Ltd. (Pro-Cert)** for evaluation of conformity to the **Canadian Organic Standard, the EEC Organic Regulation # 834/07 & 889/08, the Quebec Organic Reference Standards and the USDA National Organic Program (NOP)** and others as specified in clause 1.1 above for the estimated fee quoted and as outline in the current Pro-Cert Fee Schedule. A retainer fee of \$\_\_\_\_\_ is enclosed; the balance (remainder fee) will be paid after the inspection and upon receipt of an invoice but prior to application evaluation by Pro-Cert.

(b) It is further agreed that the Applicant will pay upon receipt of an invoice from Pro-Cert such additional costs incurred by Pro-Cert for surveillance during the certification period including but not limited to: (i) unannounced inspections, (ii) supplemental product inventory audits, (iii) additional forensic sample analyses and, (iv) surveillance actions. The rates and fees quoted in the current Pro-Cert Fee Schedule for processors are applicable.

(c) The Applicant hereby agrees to inform Pro-Cert of any planned changes in their operating procedures and/or scope including but not limited to: (i) the substances and ingredients used in the facility, (ii) the processing, storage and handling procedures, (iii) processing conducted in or for the operation which could affect the organic conformity of the product prior to implementing such changes. Pro-Cert will determine if an additional inspection is required. The applicant will not release product resulting from such changes without first receiving Pro-Cert approval.

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- (d) The Applicant acknowledges that significant changes in procedures or scope of operation require an Application for Amendment of Certification and re-evaluation, the intensity of which is to be determined by Pro-Cert. Further, that failure to notify Pro-Cert can result in suspension or loss of certification status. The applicant agrees to notify Pro-Cert in advance and at all times of the identity of any other company for which they intend to manufacture products under license, and thus as a result can use the Pro-Cert mark (name and logo) on the label of the product that it intends to market under it's own brand name even though it does not hold a compliance certificate for those products.
- (e) Pro-Cert, its employees and inspectors hereby agree to treat all information provided by the Applicant as obtained via inspection or research as confidential. Pro-Cert will obtain written permission from the applicant before disclosing confidential information. Pro-Cert is authorized to respond to legitimate inquiries as to the organic certification status of the applicant as may be received from time to time.
- (f) The Applicant hereby affirms and verifies that the description of the organic production unit and the procedures contained in this application are accurate and complete and he, she or it: (i) has read the applicable portion of the applicable standard and/or regulation; (ii) will operate the facility in accordance with the standards or regulation during the certification period; (iii) will maintain accurate and current records of all organic (and non-organic) produce and products handled by the Applicant; (iv) will not misrepresent the certification status of the facility and it's end products; (v) will not use it's product certification in such a manner as to bring Pro-Cert into disrepute and not make any statement regarding it's product certification which Pro-Cert may consider misleading or unauthorized; (vi) will use certification only to indicate that products are certified as being in conformity with specified standards; (vii) will endeavour to ensure that no certificate or report or any part thereof be used in a misleading manner.
- (g) The Applicant hereby authorizes Pro-Cert to obtain and review any and all documents or information relevant to the evaluation including but not limited to: previous certification inspection reports and documents.
- (h) The Applicant hereby authorizes and provides Pro-Cert, the Standards Council of Canada (SCC), the Canada Organic Office (COO), the AMS Administrator, the applicable State Official and CAEQ representative access to premises, facilities, product, inventories, records and documents during normal business hours for the purpose of certification, audit, verification of compliance or analysis and copying and examining whether such access is arranged or unannounced.
- (i) The Certificate of Conformity when issued and current entitles the Applicant to display one of the Pro-Cert trademarks of organic conformity on produce and product labels and to use the same in advertising material provided that Pro-Cert first reviews the working of the said labels and materials. This license terminates with temporary or permanent withdrawal of the Certificate of Conformity and/or upon lapse of the same. The Pro-Cert certification marks **may** appear on product labels while one of the following phrases **must** appear: (i) Certified Organic by Pro-Cert Organic Systems Ltd., (ii) Certified Organic by Pro-Cert Organic, or (iii) Certified Organic by Pro-Cert.
- (j) The Applicant hereby acknowledges that Pro-Cert has the right to suspend or revoke organic certification status when non-conformity with aforementioned standards and regulations is confirmed and that he, she or it agrees to terminate all reference to certification in the event of such action and further that Pro-Cert has the right to advertise such action as it sees fit. In the case of suspension, at the date of notification of the suspension and during all the following period the Applicant will make no misleading claims as to the status of certification, and cease to use the certification mark on the products concerned by the suspension. In addition, Pro-Cert may require that no certified product be put up for sale and that non-conforming product be subject to a corrective action, including product recall and label correction.
- (k) The Applicant or Representative hereby also acknowledges that there are penalties for misrepresentation of product as organic and for the making of false statements to Pro-Cert.
- (l) The Applicant hereby agrees to use of the English language in this and all other related documents.

\_\_\_\_\_  
Name of Applicant

\_\_\_\_\_  
Signature of Applicant or Representative

\_\_\_\_\_  
Date

**For Office Use Only:**  
**Pro-Cert Organic Systems Ltd.**  
**Eastern Branch Office**

\_\_\_\_\_  
Signature & Title

\_\_\_\_\_  
Date

## 18.0 ATTACHEMNTS

I have attached the following documents in support of my application for organic certification and verification of my organic production plan:

### Mandatory Attachments:

- Retaining Fee
- Site Diagram(s)
- Plant Diagram(s)
- Flow Diagram(s)
- Schedule of Supplier Certification Status
- Schedule 7.1 – Organic Product Profile (x \_\_\_\_)
- Audit Trail Flow Diagram(s)
- Label Proof for all organic labels
- Proof for advertisements bearing organic claims
- Label and/or MSDS for all sanitation agents
- Label and/or MSDS for all pest control substances

### Optional Attachments:

- Notice(s) of Non-Compliance, Suspension, Revocation or Denial<sup>1</sup>
- Previous Certificate, Letter of Transmittal and Inspection Report<sup>1</sup>
- Applicable sections of SOP
- Water Quality Analysis
- Laboratory Certificate of Accreditation

### Record Keeping Reminder:

- I have made copies of this Application & Contract and other supporting documents for my own records.

<sup>1</sup> If certified by another agency in the previous year

### Return Application/Contract and Attachments with Retaining Fee to:

**Pro-Cert Organic Systems Ltd.**

**Eastern Branch Office**

2311 Elm Tree Road Cambray, ON Canada K0M 1E0

Phone: (705) 374-5602 Fax: (705) 374-5604

Email: infoebo@pro-cert.org

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**Schedule 7.1  
Organic Product Profile**

**ORGANIC PRODUCT OR PRODUCT GROUP** \_\_\_\_\_

**Raw Material Transportation & Interim Storage**

Describe Transportation from the supplier (fields or storage facilities) to the plant; include sanitation procedures: \_\_\_\_\_  
\_\_\_\_\_

Describe unloading and interim storage facilities and cleaning procedures: \_\_\_\_\_  
\_\_\_\_\_

Are there any substances added during interim storage?  Yes  No. If Yes, describe and attach specification for each additive: \_\_\_\_\_  
\_\_\_\_\_

**Processing Procedures** [COS .310, 8.3, NOP 201(a)1, 270]

Describe the conversion of the raw material(s) to finished product and attach a flow diagram.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Ingredient/Additive Description** [COS .310, 4.4, NOP 205.201(a)2]

Describe each ingredient/additive under the following headings:

<b>Ingredient/Additive</b>	<b>Organic Status (O or NO)</b>	<b>Content (% by wt. Finished Product)</b>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

O = Organic NO = Non-organic

**ORGANIC QUALITY CONTROL**

Indicate the nature of organic integrity analyses conducted on **this product** or **product groups**:   
herbicide  fungicide residue(s)  insecticide residues  anti-biotics  growth hormones   
sanitizing agent residues  genetic modification status  microbial content  heavy metals  other  
(specify) \_\_\_\_\_

Indicate frequency of sampling/testing:  twice daily  daily  weekly  every \_\_ product units  
 other (specify) \_\_\_\_\_

How long are samples kept?  1 year  2 years  3 years  Other (specify) \_\_\_\_\_

How long is data kept?  1 year  2 years  5 years  Other (specify) \_\_\_\_\_

All organic (and other) quality control analyses must be available for inspector review.

**Packaging Description** [COS .310, 10; NOP 205.272]

Describe packaging procedures and materials:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Finished Product Storage** [COS .310, 10; NOP 205.272]

Describe interim finished product storage facilities and environmental (temperatures, humidity, etc.) conditions: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

List and describe any substances added during finished product storage (gases, etc.): \_\_\_\_\_

\_\_\_\_\_

**PRODUCT LABELLING** [COS .310, 10; NOP 205.303 - .310]

Indicate the country in which the product will be sold and the labeling category below:

**Canada** [COS 10]

- “Organic” or similar term (Requires at least 95% certified organic ingredients)  
 “Contains X % Certified Organic Ingredients” (Requires at least 70% total organic ingredients)  
 “Contains X % Certified Organic Y” (Requires at least 70% of ingredient Y)

**United States of America** [NOP 205.301]

- “100% Organic” [NOP 205.303] (Requires 100% certified organic ingredients/processing aids)  
 “Organic” [NOP 205.303] (Requires at least 95% certified organic ingredients)  
 “Made with Organic” [NOP 205.304] (Requires at least 70% certified organic ingredients)

**Other Country**

Specify any other countries this product may be exported to: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Attach copies of all principle and side panel labels used or to be used.

**ATTACHMENTS**

- Labels for any additives used or to be used during interim storage of finished product.  
 Labels for any ingredients or additives used or to be used during processing.  
 Labels to be used on principle and side panels.  
 Flow diagram of processing procedure.  
 Copies of advertising material, script, etc

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