



Instruction

Five Steps to Organic Certification

1. Purpose

This document provides producers and handlers seeking to comply with the National Organic Program (NOP) regulations with instructions for becoming certified.

2. Scope

This instruction applies to producers and handlers seeking organic certification and accredited certifying agents

3. Background

The Organic System Plan serves as the foundation of the organic certification process. The Preamble to the Final Rule describes the Organic System Plan as an agreement central to certification that “must be negotiated, enacted, and amended through an informed dialogue between certifying agent and producer or handler [that] must be responsive to the unique characteristics of each operation”. The Organic System Plan is a written plan specific to the particular operation type (crop production, livestock production, wild crop, or handling). The Organic System Plan is the central document that details how organic producers and handlers will achieve and maintain compliance with all applicable NOP regulations under 7 CFR 205.

4. Policy

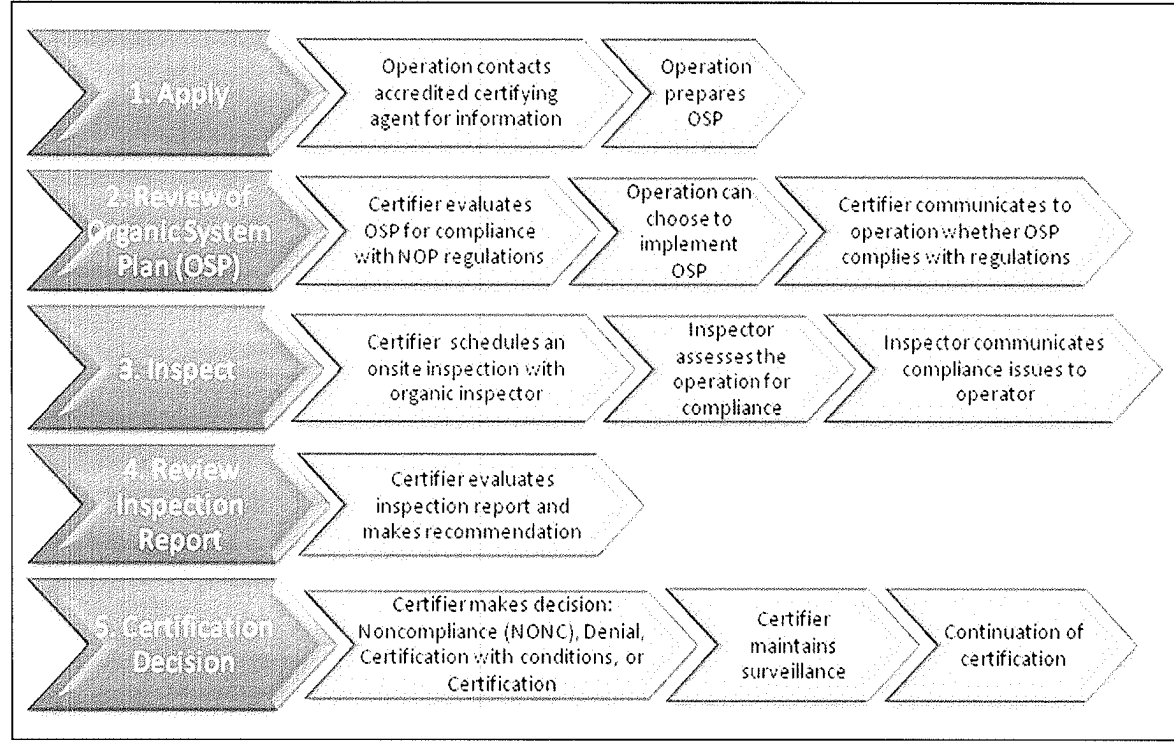
4.1 The Organic Certification Process

The organic certification process includes five steps:

1. Application and development of an Organic System Plan (OSP) by the producer or handler of an operation seeking certification,
2. Implementation of the Organic System Plan by the operation and review of an Organic System Plan by the certifying agent,
3. Inspection of the operation seeking certification to ensure compliance with NOP regulations,
4. Review of the inspection report by the certifying agent, and
5. Decision on certification by the certifying agent.



The Five Steps to Organic Certification



5. Procedure

5.1 Step 1 - Application

First, a producer or handler interested in becoming certified contacts an accredited certifying agent (also termed ACA or certifying agent). The certifying agent provides information concerning their application process including any fees associated with organic certification. Next, the producer or handler completes the application which includes the Organic System Plan. The Organic System Plan must address all requirements identified in Subpart C: Organic Production and Handling Requirements (§ 205.200 – § 205.290) of the NOP regulations. The Organic System Plan includes the following areas:

1. A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed. For example:
 - a. Practices to protect and promote biodiversity
 - b. Procedures for notifying neighbors and road departments to prevent contamination of organic crops
 - c. Tillage practices
 - d. Cultivation practices
 - e. Crop rotation practices
 - f. Pest management practices
 - g. Procedures for obtaining organic seeds



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- h. Wild crop management practices
 - i. Livestock health care practices
 - j. Harvest and transportation practices including equipment cleanout to prevent contamination
 - k. Storage practices
 - l. Processing methods including equipment cleanout to prevent contamination
 - m. Labeling procedures
 - n. Procedures for obtaining organic ingredients
2. A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable. Note that some substances have restrictions for use. For example, in the case of pest management, preventive practices must be in place prior to using approved pest control inputs. Substances may include:
- a. Compost
 - b. Manure
 - c. Soil amendments
 - d. Crop production aids
 - e. Pest control inputs
 - f. Livestock feed
 - g. Livestock feed additives and supplements
 - h. Livestock health care products
 - i. Post-harvest materials
 - j. Processing aids
 - k. Ingredients
3. A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed. This part of the Organic System Plan is designed to verify that the plan is effectively implemented and monitor the effectiveness of the organic practices to identify areas that need improvement. Organic producers and handlers can maintain organic integrity as well as maintain or improve the natural resources of the operation by monitoring the effectiveness of current practices. Monitoring methods may include:
- a. Soil testing (e.g. testing for organic matter content)
 - b. Monitoring soil moisture or monitoring water quality
 - c. Product quality testing
 - d. Monitoring crop or pasture quality
 - e. Use of body conditioning scores for monitoring herd health
 - f. Somatic cell counts
 - g. Pest monitoring



4. A description of the recordkeeping system implemented to comply with the requirements established in § 205.103. See *NOP 2602 Recordkeeping for Certified Operations* for more details on recordkeeping.
5. A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances. Management practices and physical barriers may include:
 - a. Buffer zones to prevent contamination
 - b. Establishment of a physical barrier (e.g. row of trees) to prevent drift of prohibited substances
 - c. Notification of neighbors and road departments
 - d. Procedures for identifying organic products during harvest, post harvest handling, shipping, processing and distribution
6. Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations. This may include:
 - a. Name(s) of previous certifying agent(s) and years applied
 - b. Results of previous applications for certification
 - c. Copies of all prior notices of noncompliance
 - d. Copies of all denials of certification
 - e. A description of actions taken to correct noncompliances plus evidence of corrective action
 - f. Other information deemed necessary by the certifier to verify compliance with the NOP regulations

Applications for organic certification also include the following items:

1. Applicable fees charged by the certifying agent
 - a. A signed operator agreement or affidavit, identifying the responsible party and appropriate business structure:
 - i. Sole proprietorship,
 - ii. Partnership,
 - iii. Limited Liability Company
 - iv. Corporation, or
 - v. Non-profit organization.

5.2 Step 2 - Review of the Organic System Plan

The certifying agent reviews the application for completeness and determines if the Organic System Plan appears to comply with the NOP regulations. If additional information is required by the certifier to complete the review, then the applicant will be asked to submit it prior to scheduling the on-site inspection.

The certifying agent verifies that all inputs and ingredients listed in the Organic System Plan comply with the NOP regulations. Certifying agents base their review of materials on different resources that provide a list of materials already reviewed for use in organic production.



Examples of these resources include the Organic Materials Review Institute (OMRI) generic list, OMRI products list, and approved lists published by certifying agents such as the Washington State Department of Agriculture. The certifying agent will also verify that the materials are approved for the use as specified in an operation's Organic System Plan.

The certifying agent evaluates the application and the Organic System Plan and determines if the applicant appears to be able to comply with the NOP regulations. If the applicant appears to comply or may be able to comply with the organic standards, then the certifier may schedule an inspection. The certifying agent is responsible for clearly communicating the completeness of the application and whether the applicant's Organic System Plan appears to comply with the NOP regulations.

5.3 Step 3 - Inspection

Upon approval of the application and the Organic System Plan, an inspection is scheduled of the operation. Inspections are NOT consulting visits. Inspectors may not provide advice to the producer or handler. The purpose of the onsite inspection is to:

1. Assess whether the operation is in compliance or has the ability to comply with the NOP regulations.
2. Verify that the Organic System Plan accurately reflects the activities of the operation.
3. Ensure that prohibited substances have not been applied.

The inspection of each production unit, facility, and site which produces or handles organic products includes, but is not limited to the following:

1. Evaluation of the Organic System Plan that the producer or handler maintains on-site. This evaluation assures that the producer or handler has an up-to-date plan, is implementing the plan, and that the plan is compliant with the NOP regulations.
2. For organic crop producers – evaluation of soil management, adjoining land use, buffers, land history, production capacity of the land, seeds and planting stock used, crop rotation practices, pest control practices, harvest, labeling and shipping.
3. For organic wild crop harvest producers – evaluation of designated harvest areas, sustainable harvest practices and procedures that ensure an adequate audit trail.
4. For organic livestock producers – evaluation of soil management, adjoining land use, buffers, land history, seeds and planting stock used, health care practices, origin of livestock, livestock living conditions, evaluation of conditions for temporary confinement of livestock, and pasture management practices.
5. For organic handlers – evaluation of receiving, processing, pest control, storage, labeling and shipping as well as practices to prevent commingling and contact with prohibited substances.
6. Verification of the production or handling capacity of the operation.
7. Reconciliation of the volume of organic products produced or received with the amount of organic products shipped, handled and sold.

Upon completion of the inspection, the inspector conducts an exit interview. At the exit interview, the inspector communicates compliance issues that were observed, and requests any additional information needed from the operation. This meeting is held with an authorized



representative of the operation. The inspector will provide a receipt for any samples taken. The inspector sends the report to the certifying agent for review.

5.4 Step 4 - Review of Inspection Report

Within a reasonable period of time, the certifying agent evaluates the inspection report, the Organic System Plan, the results of any analyses conducted, and any additional information provided. The certifying agent assesses the level of compliance and makes one of the following certification recommendations:

1. Certification
2. Certification with conditions
3. Noncompliance (NONC) (See *NOP 4002 Enforcement Policy* for further information)
4. Denial of certification. See 7 CFR § 205.405 Denial of Certification.

The certifying agent may conduct additional onsite inspections to verify continued compliance with the NOP regulations. These inspections may be announced or unannounced.

5.5 Step 5 - Certification Decision

If the operation complies or is capable of complying, the certifying agent issues an organic certificate. The certifying agent may issue certification with conditions for minor, non-violative issues (e.g. establishment of adequate buffer zone, development of compliant labels). Once certified, the operation's certification remains in effect until surrendered by the operation, or suspended or revoked by the certifying agent, the State organic program, or the Administrator of the USDA Agricultural Marketing Service.

5.6 Renewing Certification – the Annual Update

Once certified, the organic producer or organic handler is responsible for the following activities to maintain their certification:

Updates to the Organic System Plan

1. An operation must annually submit to their certifying agent:
 - a. An updated Organic System Plan and fees,
 - b. Updated contact information,
 - c. An update on the correction of any previously identified minor noncompliances, and
 - d. Other information as deemed necessary by the certifying agent.

Additional Updates

1. The NOP regulations require that certified operations notify their certifying agent prior to making any changes to their Organic System Plan that will affect compliance with the NOP regulations.
2. Examples of situations that would require prompt notification of the certifier include:
 - a. Application of a prohibited substance to any field, production unit, product or site in organic production, regardless of whether it was a direct application or drift from neighboring area.



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- b. Use of a new type of fertilizer, crop production aid, or pest control material that is not included in their approved Organic System Plan.
 - c. Addition of acreage or another field to organic production.
 - d. Removal of a field or a portion of a field from organic production.
 - e. Development of a new label for the operator's organic products.
 - f. New processing or new handling of organic products not already specified in the operator's Organic System Plan.
 - g. A change in any practice, input, or procedure of a certified operation that may affect compliance with the NOP regulations.

The certifying agent conducts additional inspections for new fields and new facilities before an updated certificate is issued that includes those new fields or facilities

5.7 Certification Resources – Organic System Plan Templates

In an effort to reduce variation in the interpretation of production and handling practice standards that may exist between certifying agents, the NOP encourages certifiers and operations seeking certification to take advantage of the information available from the Alternative Technology Transfer for Rural Areas (ATTRA) program a part of the National Sustainable Agriculture Information Service. These materials are free of charge and accessible via links from our website at www.ams.usda.gov/nop. Use of these resources is optional and voluntary. While certified operations and certifying agents are authorized to satisfy their compliance requirements through any set of procedures and formats sufficient for those purposes, these documents outline one method of best practices to assist in complying with the NOP regulations and are available in the following formats:

Workbook – Provides detailed descriptions of compliance requirements for each specific practice standard with extensive footnotes and resource contact list. This also includes an extensive list of compliance requirements formatted as questions that producers can fill out for crop and livestock operations.

Checklist – A simplified and streamlined version of compliance requirements formatted as questions for production and handling operations.

Organic system plan Technical Guidance – Provides a detailed description of compliance requirements formatted as completed organic system plan forms for livestock production, field and row crops, pasture and range systems, and market farms and greenhouses.

Templates and Documentation Forms – Templates include start-to-finish applications for crops, livestock, handling and renewals. Documentation forms include materials for discrete certification functions suitable for use in an organic system plan such as a field activity log, seed



and planting stock procurement record, monthly organic egg sales record and clean truck affidavit.

Inspection Report Forms – Forms designed to correspond to the crops, livestock, and handling organic system plan compliance materials provided. These forms provide the questions that inspectors answer in order to provide a description of actual field/facility operations activities.

6. References

§ 205.2 Terms Defined

Certified operation. A crop or livestock production, wild-crop harvesting or handling operation, or portion of such operation that is certified by an accredited certifying agent as utilizing a system of organic production or handling as described by the Act and the regulations in this part.

Certifying agent. Any entity accredited by the Secretary as a certifying agent for the purpose of certifying a production or handling operation as a certified production or handling operation.

Inspection. The act of examining and evaluating the production or handling operation of an applicant for certification or certified operation to determine compliance with the Act and the regulations in this part.

Organic System Plan. A plan of management of an organic production or handling operation that has been agreed to by the producer or handler and the certifying agent and that includes written plans concerning all aspects of agricultural production or handling described in the Act and the regulations in subpart C of this part.

NOP Regulations (as amended to date)

7 CFR § 205.201 Organic production and handling system plan.

7 CFR § 205.400 General requirements for certification.

7 CFR § 205.401 Application for certification.

7 CFR § 205.402 Review of application.

7 CFR § 205.403 On-site inspections.

7 CFR § 205.404 Granting certification.

7 CFR § 205.406 Continuation of certification.

Approved on July 22, 2011