



Becoming a Certified Organic Producer

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Introduction

The organic food market continues to expand in the United States, consistently growing at a rate of 15 to 21 percent per year and reaching nearly \$17 billion in consumer sales in 2006. (www.seedtoplate.com/article-1178725582.html) Organic products are increasingly present in traditional mainstream markets. This publication is designed to help farmers and processors understand the steps necessary to obtain organic certification and take advantage of this growing market.

What is organic production?

The National Organic Program (NOP) regulations define organic production as “a production system that is managed ... to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.” As an ecologically based food production system, the goal of organic production is the creation of a diverse, environmentally and economically sustainable agricultural system focused on holistic farm management, with healthy soils providing the foundation for healthy crops and livestock. Organic management eliminates the use of synthetic pesticides and fertilizers, promotes and enhances biodiversity, encourages soil biological activity, uses crop rotations to manage pests, and conserves natural habitats. For a production or handling operation to be *certified* organic, a USDA-accredited certifying agent must determine that the production or handling operation is in compliance with the National Organic Standards and award the operation a certificate of organic regulation. Growers and processors selling \$5,000 or less of organic products a year are not required to certify, but must follow the federal organic standards, including maintaining detailed records. Unless they fall under this \$5,000 threshold, all other growers and processors must be certified by an accredited agency before they can use the word “organic” to describe their product.



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There are several definitions associated with the organic standards. These can be found in the box below.

History of the National Organic Program

Prior to the enactment of the National Organic Standards, state organic laws and private certification programs paved the way for uniform federal organic certification standards. The Organic Foods Production Act, passed by Congress in 1990, called for the formation of the National Organic Standards Board and the establishment of the National Organic Program (NOP). The National Organic Standards (also known as the “Final Rule”) went into effect in October 2002, creating a single set of standards

Organic agriculture terminology

These definitions are from the National Organic Program standards. A complete list of definitions used by the NOP can be accessed online at www.ams.usda.gov/nop/NOP/standards/DefineReg.html

Buffer zone: An area located between a certified farm field and an adjacent land area that is not maintained under organic management. A buffer zone must be sufficient in size or other features, such as a windbreak or a diversion ditch, to prevent unintended contact by prohibited substances applied to adjacent land.

Drift: The physical movement of prohibited substances from the intended target site onto all or part of an organic operation.

Excluded methods: A variety of methods used to genetically modify organisms (GMOs) or influence their growth and development by means that are not possible under natural conditions or processes that are not considered compatible with organic production. Allowed methods include traditional breeding, conjunction, fermentation, hybridization, in vitro fertilization, and tissue culture.

Prohibited substance: A natural or synthetic substance that is prohibited or not provided for use under the NOP standards. Items produced using GMO technology, sewage sludge, and irradiation are not allowed.

Organic System Plan: A plan of management for 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 NOP standards.

for organic production, processing, labeling, and accreditation of certification organizations that oversee organic operations.

Transitioning to organic production

For land to be eligible for organic certification, a producer must document that it has been managed according to specific requirements. “Transitioning” describes the 36-month period prior to certification of the first organic harvest during which the land must be managed without substances prohibited by the NOP. When considering the transition to organic production, it is best to choose a certifying agency early and request an application questionnaire so you can begin the recordkeeping necessary for certification. Be sure to keep records of production practices and inputs used during transition. Near the end of the transition period, you should begin the certification process so you can become certified as soon as your transition is complete. You can obtain and read a complete set of the National Organic Standards at www.ams.usda.gov/nop/NOP/standards.html. In addition, the Organic Materials Review Institute (OMRI) web site (www.omri.org) provides detailed lists of some brand name materials which are allowed in organic production.



Making the decision to switch to certified organic is a big commitment.

Choosing a certifying agency

The first step in the certification process is the selection of a certifying agency. You want to get an application packet early in your transition to organic production so that you have some time to fill it out and think about your organic farm plan. The prospective certifying agency must be accredited by the NOP. Accredited certifiers work as an extension of the federal government to certify growers as organic. A list of certifiers active in the Midwest can be found in the Midwest Organic and Sustainable Education Service (MOSES) Upper Midwest Organic Resource Directory (www.mosesorganic.org). Before choosing a certification agency, talk to other organic farmers about their experiences with their certifiers. Talk with your potential buyers to see if they have any preferences or recommendations. Also, talk to the various certifiers about their specific practices, paperwork, and fees.

Questions that you may want to ask certified organic producers include:

1. What agency or agencies do they use?
2. Are they happy with the services they've received?
3. Does the certification agency answer questions quickly and clearly?

4. Does the agency complete the certification process in a timely manner?
5. How much does organic certification cost?
6. If the agency is a membership organization, what other benefits do the growers get from membership?

Specific questions for certifying agencies include:

1. Do they certify farmers in your location?
2. What services do they provide?
3. Do they sponsor any educational activities and/or field days?
4. Are they a membership-based organization and what is the membership fee?
5. What is the application processing fee?
6. Are there any royalties or user fees charged for organic sales?
7. Is someone readily available to answer questions?

Select your certifying agency carefully, as it is advisable to stay with that agency for many years. Once you've contacted a certifying agency, they will send you a packet containing the standards and an Organic System Plan application form; the fee for this packet is generally \$50-60. The application process is generally completed in three to four months.

Manure and compost

Compost and manure are often used as an integral part of an organic farm's fertility management program. The National Organic Standards include specific requirements on the use of manure and compost in organic production systems. As defined by the



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NOP, compost is the product of a managed process through which microorganisms break down plant and animal materials into more available nutrients suitable for application to the soil. The NOP requires that specific handling procedures be followed in order for a product to be defined as compost. The material must have an initial carbon:nitrogen ratio between 25:1 and 40:1. If an in-vessel or static aerated pile system is used, the composting materials must maintain a temperature between 131°F and 170°F for 3 days. Compost in a windrow system must maintain a

temperature between 131°F and 170°F for 15 days, and the windrows must be turned at least five times during this period.

In order to minimize the risk of microbial contamination, all manure must be composted if applied to crops destined for human consumption, unless it is applied at least 90 days before the crop will be harvested. If the edible portion of the crop comes into contact with the soil (root crops, lettuce, potatoes, onions, etc.), raw manure must be applied at least 120 days before harvest. In the Upper Midwest, it may be practical to apply raw manure in the fall prior to crop planting in order to achieve this four-month waiting period. Dehydrated, pelletized manure is not considered compost and must be applied following the 90- or 120-day requirements.



During and after harvest, certified organic produce must be kept separate from conventionally grown produce.

Certified organic seed

Growers are required to plant organically grown seed for the crops they wish to have certified. If organic seed is not available, growers may use non-organically produced, untreated seed. In this circumstance, farmers must provide evidence that organically produced seed of the variety that they wish to plant is unavailable. This proof can include telephone logs, seed catalogs, and letters from seed suppliers stating that certified organic seed is not available. Some certifiers provide specific forms to document organic seed search activities. Farmers must also make a reasonable attempt to source organically produced seed of an equivalent variety. High price is not an acceptable reason for not purchasing organic seed. All seed treatments and pelleting substances must be approved for use in organic farming. Legume inoculants cannot be genetically modified.

Harvest and storage

During and after harvest, certified organic products must be kept separate from products that are conventionally grown. There can be no commingling of organic and non-organic products or contamination through contact with prohibited substances. Equipment that is used to harvest both conventionally and organically grown crops must be thoroughly cleaned after the conventional crop has been harvested. Organic products must be kept in separate storage facilities and labeled as organic. Organic crops should not be stored in treated wood bins, non-food grade plastic bags, reused burlap bags or reused boxes that previously held non-organic products, since they

may have residues of prohibited substances. Plastic buckets or other containers that can be thoroughly washed may be reused.

Livestock requirements

Organic livestock production has specific requirements that must be considered when beginning the certification process. As with crop production, these requirements are established by the NOP. Livestock must be maintained in living conditions that, according to the NOP, “accommodate the health and natural behavior of animals”; for ruminants, this means that the animals must have access to pasture.

An existing herd can be converted to organic production by managing the herd’s feed, health care, and living conditions organically, and keeping records of this organic management, for one year prior to the production of organic milk. Third-year (24-36) month transitional feed can be fed to the transitioning herd, but it must be produced on farm, and cannot be purchased. Once the herd is producing organic milk, transitional feed is no longer allowed.

Other than the allowance for feeding third-year, farm-raised transitional feed to a dairy herd during conversion, all organic livestock must be fed 100% certified organic feed. Mineral supplements are allowed as long as they are FDA approved, do not contain non-approved additives, and are not on the National List under prohibited substances. Any agricultural products in a mineral or vitamin supplement, such as molasses to improve palatability, must be certified organic.



Health management of organic livestock must focus on preventative care.

All slaughter animals, except for poultry, must be managed organically from the last third of gestation. This means that the mother must be fed and managed organically during the last third of gestation in order for the offspring to be sold as organic. Records must be kept to verify compliance.

Requirements for the production of organic poultry have also been established by the NOP. Poultry for both egg and meat production must be raised organically from the second day after hatching. As with all livestock, poultry must have access to the

outdoors and eat 100% organic feed and approved supplements. Any bedding that may be eaten by organic animals and poultry must be certified organic as well.

Health management of organic livestock must focus on preventative care through high-quality feed, stress prevention, selection of appropriate breeds and genotypes, and good sanitation. Vaccines and homeopathic remedies are allowed, but antibiotics are not. However, it is mandatory to treat an animal with antibiotics or other non-allowed medicine if deemed necessary to save an animal's life. Treated animals must then be taken out of organic production, and their products cannot be sold as organic.

Processing requirements

Processed foods labeled as organic must conform to the National Organic Standards. "Processing" encompasses a wide range of activities including slaughtering, cutting, preserving, freezing, cooking, packaging, canning, and more. If a certified organic producer is performing these processing activities, the processing facilities must be certified. A certification plan for processing facilities should include the maintenance of detailed records concerning the handling of the product, the development of an organic handling plan following the NOP requirements, the filing of a processor or handler application, and the successful completion of an inspection. All substances used in both product processing and facility pest management must be allowable by the NOP. If the facility handles both conventional and organic products, procedures must be established that prevent commingling of the organic and conventional products. Furthermore, the facility and equipment must be cleaned between the processing of conventional and organic products.

Recordkeeping

Organic certification requires an extensive audit trail to prove that the products and practices used comply with certification requirements. The documentation required of an organic producer is part of the quality management system that instills consumer confidence in organic products. Documentation can be managed efficiently; for example, field activities, inputs, monitoring, seed planting, and harvest information could be recorded either by year or by field in a single document. The records must include enough details for



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The inspector will ask questions about your weed control strategies; here, black plastic controls weeds around tomatoes and peppers.

an inspector to ensure that NOP requirements were met. If both conventional and organic crops are produced at the same operation, records need to be particularly detailed, including the amount of product harvested from each field and cleaning of equipment, storage and transport. Buffer management records may also be needed. Livestock producers must keep records sufficient to track the identity of all organic animals and their products. Mandated organic recordkeeping helps organic farmers make informed management decisions in the future.

Examples of information that should be documented include:

- Three-year crop history, including all inputs, green manures, etc.
- Detailed map of field locations with identification numbers
- Documentation of previous land use, for fields not previously under the applicant's control
- Current proposed production by field
- Detailed map of adjoining land uses
- Neighboring land use affidavit if buffer zone is absent, verifying that no prohibited substances are applied to adjoining land
- Map of farmstead illustrating storage locations
- Proof of organic seed or documentation of the attempt to obtain organic seed
- Non-GMO affidavits for all purchased seed that is not certified organic
- Soil test results as justification for use of minerals/approved fertilizers
- Complete ingredient listing for all blended fertilizers and pest and disease inputs
- Residue analyses of all inputs such as off-farm manure
- Invoices, receipts, labels, or tags verifying purchase of inputs
- Calendar, field history sheet, or field activity book
- Detailed records of all input applications including date, rate, and location
- Monitoring records including soil, tissue, and water tests as well as observational monitoring records
- Details of what seed is planted in which field
- Date and location of tillage, cultivation, and pest control activities
- Date, location, and yield of each harvest

- On-farm cleaning affidavits when equipment and storage were also used for conventional crops
- Storage records including location, identification, amount, and cleaning activities for storage facilities
- Sales of organic products from storage or field
- Shipping records including scale ticket, dump station ticket, or bill of lading
- Processing license, if the product was processed after harvest
- Organic certificates or transaction certificates for purchased organic ingredients, feed, etc.

Prior to meeting with an inspector, you will need to organize your files by year so you can locate the necessary items quickly and easily.

The application and inspection process

The Organic System Plan Questionnaire included in the application packet will require you to provide the past three years of records for your operation. The questionnaire will take two to eight hours to complete and is specific to the certifying agency. Questionnaires are approximately 15 pages in length. Once the certifying agency has received your application, its staff will review your responses and any supporting documentation to make sure your application is complete.

When all documents have been reviewed, the certifier will give the application materials to an inspector who will conduct the on-site inspection. The inspection will take two to six hours, depending on the size of your farm, and will be scheduled when a knowledgeable representative of the farm will be present.

Each certification agency has its own fee structure. Generally, costs include an annual certification fee, a charge for the inspection, and possibly user fees, which are a percent of annual organic gross sales. For most operations, organic certification will cost \$350-\$500 per year plus user fees.

The inspector will verify that the information on the Organic System Plan is correct. They will also walk through the fields you wish to certify. They will look at the borders to make sure that there is a suitable distance, or buffer zone, between organic crops and conventionally managed land to prevent contamination with prohibited substances. Because different factors will affect the amount of protection



Beautiful, weed-free vegetable beds are possible in organic vegetable systems.

that organic fields need from the neighboring environment, the National Organic Standards do not define specific dimensions for buffer zones. The appropriate size of a buffer zone is decided on each site by the organic producer, inspector, and certifier. However, in general, 25 feet is usually an adequate size for a buffer zone. Appropriate measures to avoid drift from neighboring operations must be described in the Organic System Plan. In addition to observing the

fields, the inspector will ask specific questions about weed control strategies, pest management practices, and fertility programs. The inspector will want to know your long-term soil building plans and crop rotation to ensure that a whole-farm approach is used; any documentation you can provide in this area will help your application. Field histories, weekly notebooks, harvest and storage records, input records, and sales records are all important when you are pursuing organic certification. Estimates of the yield and value of each of your crops will be required as well.

After the site visit, the inspector sends his or her report, along with additional documentation such as fertilizer tags or seed receipts, to the certifying agency. After reviewing your file, a committee within the certifying agency will decide whether your operation meets the necessary criteria to become certified organic. There are four possible outcomes: approval for certification, a request for additional information, certification with minor noncompliances, or denial of certification.

Notice of noncompliance and denial of certification

If a certifying agent believes that your operation is not in compliance with the National Organic Standards, they will issue a written notification of noncompliance to you. This means your operation will be certified, if certain changes are made. The notice of noncompliance will include a description of the violation, as well as a date by which a correction (or corrections) must be completed and what supporting documentation is necessary. A follow-up site visit may be necessary to assure the correction has been made. If you do not comply or fail to respond, a denial of certification will be issued. If a problem cannot be corrected, the certifying agency will issue a denial of certification. Applicants who receive a notice of noncompliance or a denial of certification can apply for certification with another agency. In situations where a minor problem is observed, certification may be granted with the stipulation that the violation must be corrected within a specified time period.

Continuation of certification

Once you become certified, you must maintain that certification each year by paying your fees, having an inspection, and submitting an updated Organic System Plan that details changes from the previous year. If any minor violations of the organic standards were identified in the prior year, a verification of correction must also be submitted. Each year, an inspector will visit your farm or site and forward his or her report, along with your updated farm plan, to the certifying agency for review.

Resources

ATTRA: The National Sustainable Agriculture Information Service
P.O. Box 3657, Fayetteville, AR 72702
Phone: 800-346-9140
www.attra.ncat.org

Midwest Organic and Sustainable Education Service (MOSES)
P.O. Box 339, Spring Valley, WI 54767
Phone: 715-772-3153 Fax: 715-772-3162
Farmer Transition Hotline: 888-551-4769
www.mosesorganic.org

National List of Allowed and Prohibited Substances
www.ams.usda.gov/nop/NationalList/ListHome.html

NewFarm, The Rodale Institute
611 Siegfriedale Rd, Kutztown, PA 19530
Phone: 610-683-1416
www.newfarm.org

Organic Crop Improvement Association, Wisconsin Chapter
5381 Norway Dr., Pulaski, WI 54162
Phone: 920-822-2629 Fax: 920-822-1261
www.ocia.org

Organic Farming Research Foundation (OFRF)
P.O. Box 440, Santa Cruz, CA 95061
Phone: 831-426-6606 Fax: 408-426-6670
www.ofrf.org

Organic Materials Review Institute (OMRI)
P.O. Box 11558, Eugene, OR 97440
Phone: 541-343-7600 Fax: 541-343-8971
www.omri.org

Oregon Tilth Certified Organic
470 Lancaster Dr. NE, Salem, OR 97301
Phone: 503-378-0690 Fax: 503-378-0809
www.tilth.org

Organic Trade Association
P.O. Box 547, Greenfield, MA 01302
Shipping: 60 Wells Street, Greenfield, MA 01301
Phone: 413-774-7511 Fax: 413-774-6432
www.ota.com

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