

Developing an Organic System Plan for Row Crop Production

Beth Rota, in Collaboration with Missouri Extension

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http://www.extension.org/organic_production



ABCs of Organic Certification

Archived e-Extension Webinar with Jim Riddle, University of Minnesota

<http://www.extension.org/pages/25080/abcs-of-organic-certification-webinar>

National Organic Standards

- Based on the Organic Food Productions Act (part of the 1990 Farm Bill)
- National Organic Program Final Rule (October 21, 2002)
- Regulates who can use the term “organic” on food and fiber products in the US
- Administered by the National Organic Program



Basic Principles of Organic Production

A production system that is managed in accordance with the Act and regulations in this part to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.

7 CFR 205

http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=3f34f4c22f9aa8e6d9864cc2683cea02&tpl=/ecfr/browse/title07/7cfr205_main_02.tpl

Eligibility for Organic Certification

- Land must be free of prohibited substances for at least 3 years before harvest of organic crops
- Use of non-synthetic or allowed synthetic inputs
- Land must have buffers to prevent contamination from nearby conventional production and GMOs

Prohibited Practices

7 CFR 205.105

- Synthetic substances unless on the “National List”
- Use of non-synthetic substances on 7 CFR 205.602
- Treated wood in contact with crop, soil or livestock
- Recombinant DNA technology (Excluded Method)
- Sewage Sludge
- Ionizing Radiation



Finding a certifier

50 accredited certifiers in the US

- Areas of expertise/accreditation
- Customer Service, accessibility
- Review Time
- Availability of local inspectors
- Fee schedule

<http://www.ams.usda.gov/AMSV1.0/ams.fetchTemplateData.do?template=TemplateJ&navID=NationalOrganicProgram&leftNav=NationalOrganicProgram&page=NOPACAs&description=USDA%20Accredited%20Certifying%20Agents&acct=nopgeninfo>

When to contact a certifier

- ❑ Start a relationship with your certifier during the transition period – don't be afraid to call and ask questions
- ❑ Submit application 4-6 months before organic crop will be ready for harvest, or check with certifier
- ❑ Inspection will need to occur after planting and before harvest
- ❑ Transitional certification – check with certifier

Working with a consultant

- ❑ Certifier may only evaluate compliance – may not act as a consultant
- ❑ Is a consultant right for you? Cost/benefit
- ❑ Ask extension and certified producers in your area
- ❑ NRCS
- ❑ Search the web:
 - http://www.omri.org/suppliers/OMRI_consultants
 - <http://www.howtogoorganic.com/index.php?page=consulting-services>
 - <http://tinyurl.com/organicconsultants>

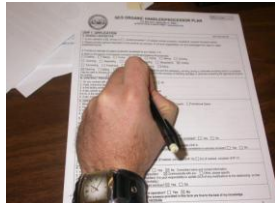
Developing an Organic System Plan (OSP)

- ❑ Certifier's Application is your Organic System Plan
- ❑ OSP shows how you will comply with organic standards
- ❑ Certification is based on the implementation of OSP
- ❑ Notify certifier and get approval prior to changing your plan (inputs, crops, land)

Organic System Plan Overview

7 CFR 205.201

1. Production and handling practices
2. Inputs
3. Monitoring
4. Record-keeping
5. Prevention of commingling and contact w/ prohibited substances
6. Additional info needed by certifier



Production and Handling Practices

Plan must include a description of practices and procedures to be performed and maintained, including the frequency with which they will be performed. Examples:

- Tillage and cultivation practices, minimizing erosion
- Maintaining/improving soil
- Preventing contamination of crops, soil and water
- Crop rotation
- Seed sourcing
- Field activities
- Equipment cleaning
- Harvest and Sales

Crop Rotation

- ❑ NOP Definition: The practice of alternating the annual crops grown on a specific field in a planned pattern or sequence in successive crop years so that crops of the same species or family are not grown repeatedly without interruption on the same field.
- ❑ Cover crops
- ❑ Use to manage crop nutrients and soil fertility
- ❑ Breaks up pest cycles by having different host crops

Seed sourcing

- ❑ Organic seeds required unless they are not commercially available. Check at least 3 sources and keep a record.
- ❑ Non-organic seeds, if used, must be:
 - Untreated
 - Non-GMO

ATTRA Directory of Organic Seed Suppliers
https://attra.ncat.org/attra-pub/organic_seed/
Organic Seed Finder www.organicseedfinder.org

Production & Handling Inputs

Plan must include a list of all inputs

- ❑ Fertilizers and compost
- ❑ Pest, disease and weed control
- ❑ Allowed seed treatments
- ❑ Inoculants
- ❑ Post harvest treatments (i.e. sanitizers)

Always notify certifier before adding new inputs, regardless of apparent allowed status

Reviewing Inputs - Fertilizers

- ❑ Only non-synthetic or allowed synthetic ingredients are allowed
- ❑ Composted and uncomposted plant and animal materials
- ❑ Synthetic micronutrients

Pest, Weed & Disease Control Inputs

- ❑ Must use physical & mechanical practices first (i.e. crop rotation, species selection, cultivation)
- ❑ Biological or botanical substances or a substance on the National List (7 CFR 205.601) may be used, provided that the conditions for using are documented in the organic system plan.

Monitoring

- ❑ Effectiveness of soil fertility & crop nutrient management practices
- ❑ Pest and disease monitoring
- ❑ Contamination of crops, soil or water

Recordkeeping

- ❑ Adapt records to your operation
- ❑ Fully disclose all activities and transactions in sufficient detail to be readily understood and audited
- ❑ Be maintained for 5 years (minimum)
- ❑ Be able to demonstrate compliance – by showing that your organic system plan is implemented
- ❑ Make available for inspection

Must Have Records

- ❑ Seed and planting stock sourcing
- ❑ Input purchases (Invoices and Labels)
- ❑ Input applications (Date and Rate)
- ❑ Preventative pest control practices
- ❑ Equipment Cleaning
- ❑ Buffer maintenance, including crops harvested from buffer
- ❑ Traceability of organic crops from harvest to sales
- ❑ Documentation of clean transport units

Ways to keep records



Key to success: Find the way that works best for YOU!

RESOURCE:

<https://attra.ncat.org/attra-pub/summaries/summary.php?pub=358>

Preventing Contamination & Commingling

The plan must include 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 land and crops with prohibited substances.

Preserving Organic Integrity

Plan should describe how you:

- ❑ Clean shared production equipment to remove soil, seeds and harvested crop residue
- ❑ Separate organic and conventional seeds and inputs
- ❑ Prevent input contamination from shared irrigation systems
- ❑ Segregate organic crops during and after harvest

Buffer management

- ❑ Buffers are site specific and risk based
- ❑ Buffers may include runoff diversions and/or vegetation
- ❑ Buffer harvest – if crops are harvested from the buffer, segregate from organic crops and clean equipment
- ❑ Show buffers on farm maps

Preventing GMO Contamination

- ❑ Corn
 - Time planting to offset tasseling – 2 weeks
 - 660 feet distance between organic and GMO varieties
- ❑ Soybeans
 - Self-pollinating, standard buffers should be sufficient
- ❑ Other crops – check with certifier
- ❑ E-organic webinar on GMO contamination:
<http://www.extension.org/pages/33163/gmo-contamination:-whats-an-organic-farmer-to-do-webinar>

Other info needed by certifier

Certifiers may request additional info at any point during the certification process:

- Respond in a timely manner (less than 2 weeks)
- Provide complete access to records
- It's okay to ask why they need certain info – per the applicable section of the NOP Final Rule

Notify certifier of any unexpected events that may affect compliance and prior to making changes to your plan!

Steps to Organic Certification

- ☑ Request and complete Organic System Plan application and submit to certifier
- ☑ Review of OSP by the certifying agent
- ☑ Implementation of OSP by the operation
- ☑ Inspection of the operation
- ☑ Review of inspection report by certifier
- ☑ Certification Decision
- ☑ Follow up if Minor Noncompliances are issued
- ☑ Annual renewal

Additional Resources

- ❑ USDA National Organic Program:
<http://www.ams.usda.gov/AMSV1.0/nop>
- ❑ eOrganic: <http://eorganic.info/>
- ❑ National Sustainable Agriculture Information Service (ATTRA): <https://attra.ncat.org/>
- ❑ Organic Materials Review Institute: www.omri.org
- ❑ Organic Seed Finder: www.organicseedfinder.org

Find all upcoming webinars and archived eOrganic webinars at <http://www.extension.org/pages/25242>

Find the slides as a pdf handout and the recording at <http://www.extension.org/pages/66582>

Additional questions about organic farming?
<http://www.extension.org/ask>

We need your feedback! Please fill out our follow-up email survey!

