



Public Comments to the National Organic Standards Board
May 13, 2003, Austin, Texas

Submitted by George Kuepper
NCAT Program Specialist

Good morning. I'm George Kuepper, a program specialist with the National Center for Appropriate Technology, based in Fayetteville, Arkansas. For the past year-and-a-half we have been working on a project co-funded by the National Organic Program and National SARE. The objective of this project has been to develop some educational materials to assist producers in farming sustainably while understanding and complying with the Regulations. Two NOSB members—Rose Koenig and Jim Riddle—have been active participants in the stakeholder group that has guided this project, along with a number of very talented and committed folks from the organic community.

About two weeks ago I mailed each of you copies of the *Organic and Sustainable Practices Workbooks* for crop and livestock systems, which are the principal deliverables on this project. I wanted to make you aware that mailings have also been made to the 70+ domestic certifiers on NOP's website list. It is our hope that certifiers will become a prime means of getting these tools into the hands of producers—especially new producers, who are expected to benefit the most.

We have also mailed copies to roughly 45 organic farmer organizations we have in our ATTRA Project database. There is also a mailing planned to county-level Cooperative Extension offices and to NRCS field offices.

Additional deliverables include three packets of on-farm documentation forms, which we hope will assist producers in recording those activities and inputs that testify to their compliance with the regulations. I have copies of the *Organic field Crops Documentation Forms* available for Board Members this morning. The remaining two packets for livestock and for orchard/vineyard crops will, hopefully, be published within a month or so. We are also in the final stages of completing a checklist for producers.

For the record, these materials are all available as .pdf downloads from the ATTRA website at <<http://www.attra.ncat.org>> or as hardcopy by calling ATTRA at 1-800-346-9140.

I certainly want to thank Barbara Robinson for providing NOP funding for this project and Jill Auburn at SARE for her support.

I'd be pleased to entertain any questions or comments.

ATTRA is an NCAT project and is funded by the USDA Rural Business - Cooperative Service.



ORGANIC FIELD CROPS DOCUMENTATION FORMS

By George Kuepper, NCAT Agriculture Specialist and
Lisa Cone, Waterfall Hollow Farm, Berryville, AR
May 2003

THE PURPOSE AND USE OF THESE FORMS

In order to become certified organic, producers must demonstrate to an accredited certifier that their farm operation complies with National Organic Program regulations. This is accomplished initially by completing an Organic System Plan (OSP) – normally part of the application for certification. The OSP illustrates to the certifier how the producer plans to comply with the regulations by detailing practices, monitoring procedures, and the different inputs that will be used. The Organic System Plan is backed up by on-site inspection to ensure that the producer is, in fact, farming in the manner outlined in his or her OSP. It is the inspector's responsibility to look for documentation and indicators that bear out the producer's claim to organic status, as well as look for any violations.

The forms in this package are provided as tools that farmers can use for documenting practices, inputs, and activities to demonstrate compliance with regulations or to assist in other aspects of farm record keeping. The forms can be kept in the barn, machinery shed, or anywhere they can make recording easiest.

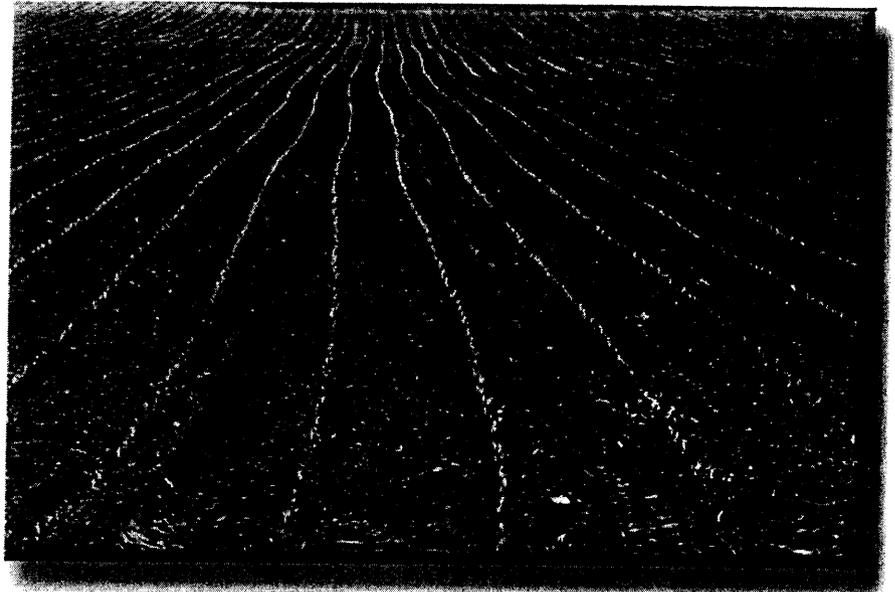
Please note that these are not required forms! Organic farmers have more than enough mandatory paperwork to keep them occupied. These forms are merely intended to give you something convenient and organized to record routine things that may be important to document. Use only those forms that suit your operation and recycle the rest.

ACKNOWLEDGEMENTS

These documentation forms were developed by the National Center for Appropriate Technology (NCAT) with funds provided by the USDA/National Organic Program (NOP) and the USDA/CSREES Sustainable Agriculture Research and Education (SARE) Program. Distribution is being done through NCAT's ATTRA Project, the National Sustainable Agriculture Information Service.

The authors wish to acknowledge the contributions of those in the organic community who contributed to the creation of these documents including:

- Katherine Adam, NCAT, Fayetteville, AR
- Janet Bachmann, NCAT, Fayetteville, AR
- Harriet Behar, organic inspector and chairperson, IOIA, Gays Mills, WI



- Diane Bowen, Green Opportunities Consulting, Milwaukee, WI
- Emily Brown-Rosen, Organic Materials Review Institute, Titusville, NJ
- Rex Dufour, NCAT, Davis, CA
- John Foster, Seven Spoke Farm, McMinnville, OR
- Lance Gegner, NCAT, Fayetteville, AR
- Gail Hardy, NCAT, Fayetteville, AR
- Mark Keating, Agricultural Marketing Service, USDA, Washington, DC
- Rose Koenig, Rosie's Organic Farm and NOSB board member, Gainesville, FL
- Nick Maravell, Nick's Organic Farm, Potomac, MD
- Nancy Matheson, NCAT, Helena, MT
- Teresa Maurer, NCAT, Fayetteville, AR
- Miles McEvoy, Washington State Department of Agriculture, Olympia, WA
- Jim Riddle, Organic Independents and NOSB board member, Winona, MN
- Maria Rosmann, Rosmann Family Farms, Harlan, IA
- Kelly Shea, Director of Organic Agriculture, Horizon Organic, Penrose, CO
- Francis Thicke, Radiance Dairy, Fairfield, IA
- Ann Wells, NCAT, Fayetteville, AR

This set of documentation forms contains the following:

- A. Activity Log – use to record all practices and equipment used for each field from pre-plant through post-harvest.
- B. Inputs Log – use to record all materials, seeds and/or seedlings used for each field from pre-plant through post-harvest.
- C. Organic Seed and Planting Stock Record – for documenting source, treatment and other information on seed and planting stock used.
- D. Organic Seed and Planting Stock Search Record – when non-organic seed or plants are used it is necessary to demonstrate that attempts were made to locate an organic source.
- E. Compost Production Record – to meet National Organic Program regulations, compost production requires that initial carbon-to-nitrogen ratios be within a certain range, that proper temperatures be sustained, and that piles (in certain systems) be turned a minimum number of times.
- F. Field Soils Monitoring Log – this form can be used to document monitoring of soil fertility and soil erosion. Monitoring procedures are required to justify the use of most micronutrient fertilizers.
- G. Field Pest Monitoring Log – this form can be used to document monitoring of weeds, diseases, and insect pests. Monitoring procedures are required to justify the use of most biological, botanical, and allowed synthetic pesticides.
- H. Harvest Record, *Organic* – use to record your organic and buffer zone harvest information.
- I. *On-Farm* Bin Storage Record, *Organic* – use to record details of your on-farm storage in organic-only farming operations.
- J. *On-Farm* Cold Storage Record, *Organic* – use to record details of your on-farm refrigerated storage in organic-only operations.
- K. *On-Farm* Bin Storage Record, *Split* Operation – use to record details of your on-farm storage of organic, transitional, and conventional crops.
- L. *On-Farm* Cold Storage Record, *Split* Operation – use to record details of your on-farm refrigerated storage of organic, transitional, and conventional crops.
- M. *Off-farm* Bin Storage Record, *Organic* – use to record off-farm storage of organic crops.
- N. *Off-farm* Cold Storage Records, *Organic* – use to record off-farm refrigerated storage of organic crops.
- O. Pest Control Log for Crop Storage Units – for recording pest control activities and inputs in your crop storage units.
- P. Equipment Cleanout Log – use to record cleanout activities of farm equipment.
- Q. Equipment Settings Record – use to record settings and adjustments for your field equipment, for your convenience and increased efficiency year to year.
- R. Sales Record – use to record sales of farm production.

These forms may be copied and distributed freely. They may be downloaded from the ATTRA website at <<http://attra.ncat.org>>. Additional hardcopies can also be obtained by writing ATTRA at PO Box 3657, Fayetteville, AR 72702, or by calling 1-800-346-9140.

Organic Seed and Planting Stock Search Record			
Producers may use non-organic seed only when organic seed is not commercially available. Use this form to document companies and individuals you contacted in your search for organic seed and stock.			
Farm Name or Unit:			Crop Year:
Crop/Variety Required:			
Date	Company Name	Contact Information	Outcome of Inquiry
Crop/Variety Required:			
Date	Company Name	Contact Information	Outcome of Inquiry
Crop/Variety Required:			
Date	Company Name	Contact Information	Outcome of Inquiry
Crop/Variety Required:			
Date	Company Name	Contact Information	Outcome of Inquiry
Crop/Variety Required:			
Date	Company Name	Contact Information	Outcome of Inquiry

Fertility / Soil Monitoring Log					
Farm Name or Unit:	Field ID:	Acres:	Crop:	Year:	
Date of most recent soil test:					
<i>When compared with previous soil tests, are your nutrient levels (circle):</i>					
P (phosphorus)	decreasing	stable	increasing	excessive	not tested
K (potassium)	decreasing	stable	increasing	excessive	not tested
Ca (calcium)	decreasing	stable	increasing	excessive	not tested
Mg (magnesium)	decreasing	stable	increasing	excessive	not tested
S (sulfur)	decreasing	stable	increasing	excessive	not tested
Na (sodium)	decreasing	stable	increasing	excessive	not tested
B (boron)	decreasing	stable	increasing	excessive	not tested
Cu (copper)	decreasing	stable	increasing	excessive	not tested
Mo (molybdenum)	decreasing	stable	increasing	excessive	not tested
Zn (zinc)	decreasing	stable	increasing	excessive	not tested
Mn (manganese)	decreasing	stable	increasing	excessive	not tested
Fe (iron)	decreasing	stable	increasing	excessive	not tested
Organic matter / Humus levels	decreasing	stable	increasing	-----	not tested
pH is:	within or approaching desired range			out of or moving away from desired range	
Crop Monitoring:					
Are there visible signs of nutrient stress?			No	Yes	
Erosion Monitoring:					
Is there evidence of wind and/or water erosion?			No	Yes	
Additional Notes on Soil and Crop Monitoring:					

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