



## Guidance Wild Crop Harvesting

### 1. Purpose

This guidance document clarifies ways in which accredited certifying agents and certified operations can demonstrate compliance with National Organic Program (NOP) regulation wild-crop harvesting practice standard.

### 2. Scope

This guidance applies to all certifying agents and certified operations that certify or harvest wild crops as organic.

### 3. Background

The wild crop harvesting practice standard (§ 205.207) was published in December 2000. Prior to 2011, no further guidance was provided to organic producers or certifying agents regarding organic system plan (OSP) requirements, certification requirements, or inspection requirements. In October 2010, the NOP published draft guidance. Based on comments received, final guidance was published in May 2011.

### 4. Policy

Operations may be certified for the wild-crop harvesting of species from a defined terrestrial or aquatic area described in an organic system plan (OSP) in a manner that maintains or improves the natural resources of the area. Eligible species can be plant or other non-animal species, such as mushrooms, kelp, or seaweed, that are fixed to a defined location by a species part, such as a root, holdfast, mycelial thread, rhizoid, or stolon.

Certifying agents and certified operations should consider whether certification as a crop or wild-crop is more appropriate when any management techniques other than sustainable harvesting are employed. Minimal agricultural practices, such as re-seeding from and pruning of existing plants or the removal of non-native species, along with the sustainable harvesting of the wild crops may be employed and, in some cases, even required by other jurisdictions to support the long-term viability of the habitat.

Management practices beyond those specified above are considered an indicator of crop production, thus requiring crop certification. Irrigation, use of permitted materials, such as those on the *National List of Allowed and Prohibited Substances*, introduction of new plants, seeding with seeds not from the existing plants, and any form of tillage, are examples of agricultural practices where certification as a crop, not a wild-crop, is required. Production systems that mimic a natural system, such as a ginseng or coffee operation using shade cloth rather than the natural shade of a forest, are no longer wild systems, and would require crop certification.



Section 205.200 states that production practices must maintain or improve the natural resources of an operation under organic certification. This applies to all types of organic certification, including wild crops. Unmanaged, untrained and uninformed harvesting of wild products from a wild habitat without maintaining or improving the natural resources can disqualify the wild products from organic certification. Harvesting products from an abandoned farm or orchard does not qualify the products for certification as organic as a wild-crop or crop because there are no documented management practices being employed. If management of an abandoned farm or orchard is re-established, then that operation can be considered for certification for organic crop production, but not wild-crop harvesting, upon verification of the new OSP. In addition, products harvested from an area slated for clearing or clear-cutting that is not shown as necessary to improve the natural resources or is detrimental to the natural resource management of that area, cannot be certified as organic as a wild-crop or a crop.

Examples of wild-crops *may* include, but are not limited to, the following:

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|--------------|---------------------|----------------|
| 1. Mushrooms | 3. Kelp and seaweed | 5. Maple Syrup |
| 2. Herbs     | 4. Blueberries      | 6. Ginseng     |

## 5. Procedure

### 5.1. General

Applicants for organic wild-crop harvest certification should provide basic information about their proposed wild-crop harvesting as required by their certifying agent.

### 5.2. Organic System Plan

A wild-crop harvesting Organic System Plan (OSP) includes:

1. A full map of the area(s) to be harvested defining boundaries, borders, adequate buffer zones, point and non-point sources of contaminants and prohibited materials, and wild crops to be harvested.
2. Documentation that no prohibited materials have been applied to or have contaminated the land or aquatic area within the last three years.
3. A description of the natural environment of the harvest area (e.g. scrub steppe, oak-chaparral woodland, deciduous hardwood forest).
4. A description of the proposed ecosystem management and harvesting practices, the impact of their proposed harvesting on the long-term viability of the wild species and on the area's ecosystem, and information on any equipment planned for use or being used to harvest and manage the wild-crop and ecosystem.
  - a. This should include a description of the monitoring system that will be used to ensure that the crop is harvested in a sustainable manner that does not damage the environment, including soil and water quality.
5. A list of any rare, threatened, or endangered terrestrial or aquatic plants or animals that occur in the harvest area.



- a. The presence of rare, threatened, or endangered species in a wild harvest area does not automatically disqualify an operation from organic certification, but any potential or actual impacts need to be described and addressed.
  - b. If there are potential or actual negative impacts resulting from the wild crop management and harvesting, actions that address and correct these impacts need to be described, implemented, and monitored.
6. The procedures employed that prevent contamination from adjoining land use or other point or non-point sources contamination.
  7. The training provided and the procedures employed to ensure that all collectors harvest crops in accordance with the OSP and in a manner that does not damage the environment.
  8. The recordkeeping system that identifies all collectors, documents management and harvest practices, and provides the quantities and dates of wild crops harvested.

### **5.3. Land that is already certified**

In the case of wild-harvesting crops on land that is already certified organic, the applicant does not have to apply separately. The wild crop harvesting should be verified at the time of the farm inspection to ensure that it complies with the wild-crop harvesting standard.

1. The applicant should list all wild crops requested for certification and verify all practices are well-described, include details on how practices will maintain or improve the natural resources of the area, and should clearly list all personnel involved in the operation's OSP.
2. If certified, the certifying agents should list all wild crops along with all other crops and products that are certified organic on the organic certificate issued to the certified operation.

### **5.4. Verification of lands or waterways**

1. In the case of public lands or waterways, the responsible authority of those lands or waterways should verify that no prohibited materials have been applied to or have contaminated the land or waterways for at least three years prior to harvest by providing a signed and dated affidavit to the certified operation.
2. In the case of private lands and waterways, the private owner shall provide a verification that no prohibited materials have been applied to or have contaminated the land or waterways for at least three years prior to harvest by providing a signed and dated affidavit to the certified operation.

### **5.5. Inspection Criteria**

Inspection criteria to verify compliance could include:

1. An inspection of the wild crop harvest area, prior to harvest, to ensure that all practices and conditions are well-described, and protective of the natural resources of the area.
2. Verification that the species being harvested are the intended species and that these are the same



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species specified on the application and in the OSP.

3. An interview with the primary wild harvester and a sampling of other wild crop harvesters, if applicable, to verify that practices employed during harvest correspond to those documented in the OSP.
4. A review of all written area management and crop harvest procedures to verify that they are being implemented and that all harvesters have been adequately trained.
5. A review of the handlers within the chain of custody of the wild crop harvest operation.
6. Inspection of border and buffer zones to assess contamination potential for adjoining land uses, the point and non-point sources of contamination, and maintenance of buffers, as applicable.

## 6. References

### § 205.2 Terms Defined

Wild crop. Any plant or portion of a plant that is collected or harvested from a site that is not maintained under cultivation or other agricultural management.

### NOP Regulations (as amended to date)

7 CFR § 205.200 General.

7 CFR § 205.207 Wild-crop harvesting practice standard.

Approved on July 22, 2011