



United States
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Agriculture

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Marketing
Service

1400 Independence Avenue, S.W.
Room 2642-S, Mail Stop 0268
Washington, D.C. 20250-0268

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TO: USDA-Accredited Certifying Agents

FROM: Jennifer Tucker, Ph.D.
Deputy Administrator
National Organic Program (NOP)

SUBJECT: Organic Integrity Database – Transitional Operation Reporting

The Organic Integrity Database ([INTEGRITY](#)), operated by the USDA Agricultural Marketing Service National Organic Program (NOP), is a registry of certified organic operations. The system includes data provided by USDA-accredited organic certifiers.

On May 17, 2023, the NOP launched the Trade Partner module in INTEGRITY, an important step in implementing the Strengthening Organic Enforcement final rule. This launch also includes a new feature: the ability for certifiers to identify an operation as being in Transitional status in INTEGRITY. This means that certifiers may add transitioning, but not yet certified, operations to INTEGRITY if they meet the criteria described in this document.

Criteria for Listing Transitional Operations in Integrity

For a USDA-accredited certifying agent (certifier) to list an operation as transitional in INTEGRITY, the operation must have completed an Organic System Plan (OSP), and that OSP must have been reviewed by a certifier.

- Completing an OSP is an important step for preparing for eventual certification under the USDA organic regulations (7 CFR 205). The OSP documents the agricultural production and/or handling practices and recordkeeping system that the transitioning operation is implementing to establish a compliant organic system.
- The OSP also lists the materials used by the operation, so the certifier can confirm that no prohibited substances are reported as being used in the part of the operation transitioning from non-organic to organic.
- Certifiers do not need to conduct an inspection to report a transitional operation in INTEGRITY. A desk review of the OSP to confirm that the operation has reported practices and materials that should result in eligibility for organic certification is sufficient for listing purposes. In other words, if the OSP indicates that the operation is or plans activities that demonstrate compliance with the USDA organic regulations, and is only using allowed materials, the certifier may list the operation in INTEGRITY with a “Transitional” status.
- If the certifier determines that the practices do not support compliance and materials reported in the OSP are not allowed, the certifier is to provide that feedback to the

operation about their eligibility status, and the operation is not to be listed as transitional. The operation may resubmit an updated, compliant OSP at any time, or as often as is required for other programs, such as transitional crop insurance. If prohibited materials have been used, eligibility for organic certification may be delayed.

- Operations are encouraged to provide updated OSPs to the certifier once per year if a change in practices and/or materials that could impact compliance has occurred.

Benefits of Being Listed as a Transitional Operation in INTEGRITY

There are several benefits of listing transitional operations in INTEGRITY:

- Listed transitional operations may be eligible for consideration for [transitional crop insurance](#) from the USDA Risk Management Agency (RMA).
- Applicants for an [Organic Market Development Grant \(OMDG\)](#) (Summer 2023) must be listed in INTEGRITY in order to receive a grant.
- Practice-related information in an OSP may also be useful for other purposes, such as conservation planning through the USDA Natural Resources Conservation Service (NRCS) or other climate-smart agriculture programs.
- Completing an OSP provides an early mechanism for operations to connect with a certifier, learn the organic rules, and implement compliant systems with respect to practices, materials use, and recordkeeping. This process helps an operation and certifier detect potential non-compliances early, and may help prevent an unexpected denial of certification later in the process.
- Operations with a reviewed OSP have clearly documented a commitment to transitioning to organic; the completion of this step may be attractive to candidate buyers willing to engage in transitional contracts.
- Certifiers also benefit from building a relationship with transitional operations early in the process. This allows them to identify potential problems early, connect the operation to useful technical assistance resources, and may ease the certification process once the formal application phase begins. Further, these desk reviews may further diversify certifier revenue streams and may support human capital workload balancing.
- The listing of transitional operations will also help USDA track progress and report metrics related to the Organic Transition Initiative (OTI) and the Transition to Organic Partnership Program (TOPP).

Reviewing OSPs and Reporting Transitioning Operations

The following bullets provide more information about the listing of transitional operations in INTEGRITY:

- Transitional operations are not able to self-report to INTEGRITY; only a USDA-accredited certifier can enter transitional operations into the system.
- A transitional operation may use any OSP template or form that complies with the USDA organic regulations. Operations may request an OSP template from any certifier. NOP plans to publish a “Common OSP” for transitioning operations in fall 2023 as a

certifier-neutral alternative for operations who are not ready to commit to a specific certifier for certification.

- The NOP recognizes that reviewing an OSP for a transitional operation requires resources for certifiers, and acknowledges that this is a fully optional service. Certifiers are not required to engage in providing this service if they do not wish to do so. Certifiers choosing to provide the OSP review service may include this activity in its published fee schedule.
- Transitional operations listed in INTEGRITY by certifiers will only be viewable to logged-in USDA and certifier users. Listings of transitional operations will also be provided to RMA and its agents, for the purpose of evaluating eligibility for transitional crop insurance. Transitional operations will not be viewable by the public.
- Once listed in INTEGRITY, transitional operations will remain listed with this status unless and until a certifier grants or denies organic certification; finds that the operation no longer has a compliant OSP (e.g., provides a non-compliant OSP update); or an operation indicates to a certifier or NOP it is withdrawing from the process. NOP will be adding a status to INTEGRITY that allows certifiers to report that an operation has withdrawn from the transition process.
- The NOP will monitor the listing of each transitional operations, and after three years has passed, will work with certifiers to determine the status of the operation, and whether a change in the operation's designation in INTEGRITY is appropriate.

The NOP thanks the certifiers who choose to participate in this new service to support transitional operations!