



# National Organic Program Accredited Certifying Agent Training 2011





# OBJECTIVES

- UNDERSTANDING THE 5 STEPS OF CERTIFICATION;
- ABILITY TO IMPLEMENT THE 5 STEPS OF CERTIFICATION IN PROCESSING NEW APPLICATIONS, AND RENEWING EXISTING CERTIFICATIONS.





# Five Steps to Certification

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- A vertical decorative graphic on the left side of the list, featuring a yellow and orange background with a stylized, dark, curved shape that resembles a musical note or a stylized letter 'J'.
1. Application
  2. Review and approval of Organic System Plan (OSP)
  3. Inspection
  4. Evaluation of inspection report – recommendation for certification
  5. Certification decision



# Step 1: Application

## The Operation's Application includes:

- Organic System Plan
- Operator Agreement
- Producers – maps, land history
- Handlers – formulas, labels





## The Organic System Plan (OSP)

- a. **Description of practices and procedures;**
- b. List of all substances used;
- c. Description of monitoring practices & procedures;
- d. Recordkeeping system;
- e. Management practices to prevent commingling and contamination;
- f. Other information deemed necessary by the certifier



OSP

a. description of practices

- Practices to protect and promote biodiversity
- Procedures for notifying neighbors and road departments to prevent contamination of organic crops
- Tillage practices
- Cultivation practices
- Crop rotation practices



OSP

a.

## a. description of practices, cont.

- Pest management practices
- Procedures for obtaining organic seeds
- Wild crop management practices
- Livestock health care practices
- Harvest and transportation practices including equipment cleanout to prevent contamination



OSP

a.

# a. description of practices, cont.

- Storage practices
- Processing methods including equipment cleanout to prevent contamination
- Labeling procedures
- Procedures for obtaining organic ingredients





OSP

# The Organic System Plan (OSP)

- a. Description of practices and procedures;
- b. List of all substances used;**
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- f. Other information deemed necessary by the certifier



OSP

b.

## b. a list of all substances used

- Within the Organic System Plan
  - Pursuant to 205.201(a)(2) – a list of each substance to be used as a production or handling input must be included:
    - Its composition
    - Source
    - Location where it will be used
    - Commercial availability (seeds, 205.606)



OSP

b.

## b. a list of all substances used

- Compost
- Manure
- Fertilizer/Soil amendments
- Crop production aids
- Pest control inputs
- Livestock feed

- Livestock feed additives and supplements
- Livestock health care products
- Post-harvest materials
- Processing aids
- Ingredients



OSP

# The Organic System Plan (OSP)

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OSP

c.

## c. description of monitoring practices & procedures

- Soil testing (e.g. testing for organic matter content)
- Monitoring soil moisture or monitoring water quality
- Product quality testing
- Monitoring crop or pasture quality
- Use of body conditioning scores for monitoring herd health
- Pest monitoring



OSP

# The Organic System Plan (OSP)

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OSP

d.

## d. Recordkeeping System

Organic operations must maintain a transparent and traceable recordkeeping system





## § 205.103 Recordkeeping by certified operations

- (a) A certified operation **must maintain records concerning the production, harvesting, and handling of agricultural products** that are or that are intended to be sold, labeled, or represented as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))."
- (b) Such records must:
- (1) **Be adapted to the particular business** that the certified operation is conducting;
  - (2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be **readily understood and audited**;
  - (3) Be maintained for not less than **5 years** beyond their creation; and
  - (4) **Be sufficient to demonstrate compliance** with the Act and the regulations in this part.
- (c) The certified operation **must make such records available for inspection** and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.

## d. the farm map

- It must be accurate
  - Borders/ boundaries are clearly marked by fence signs roads, etc.
  - Shape and size accurate
- Must clearly identify adjoining land use
  - Uncultivated (e.g. woods)
  - Conventional (identify crop)

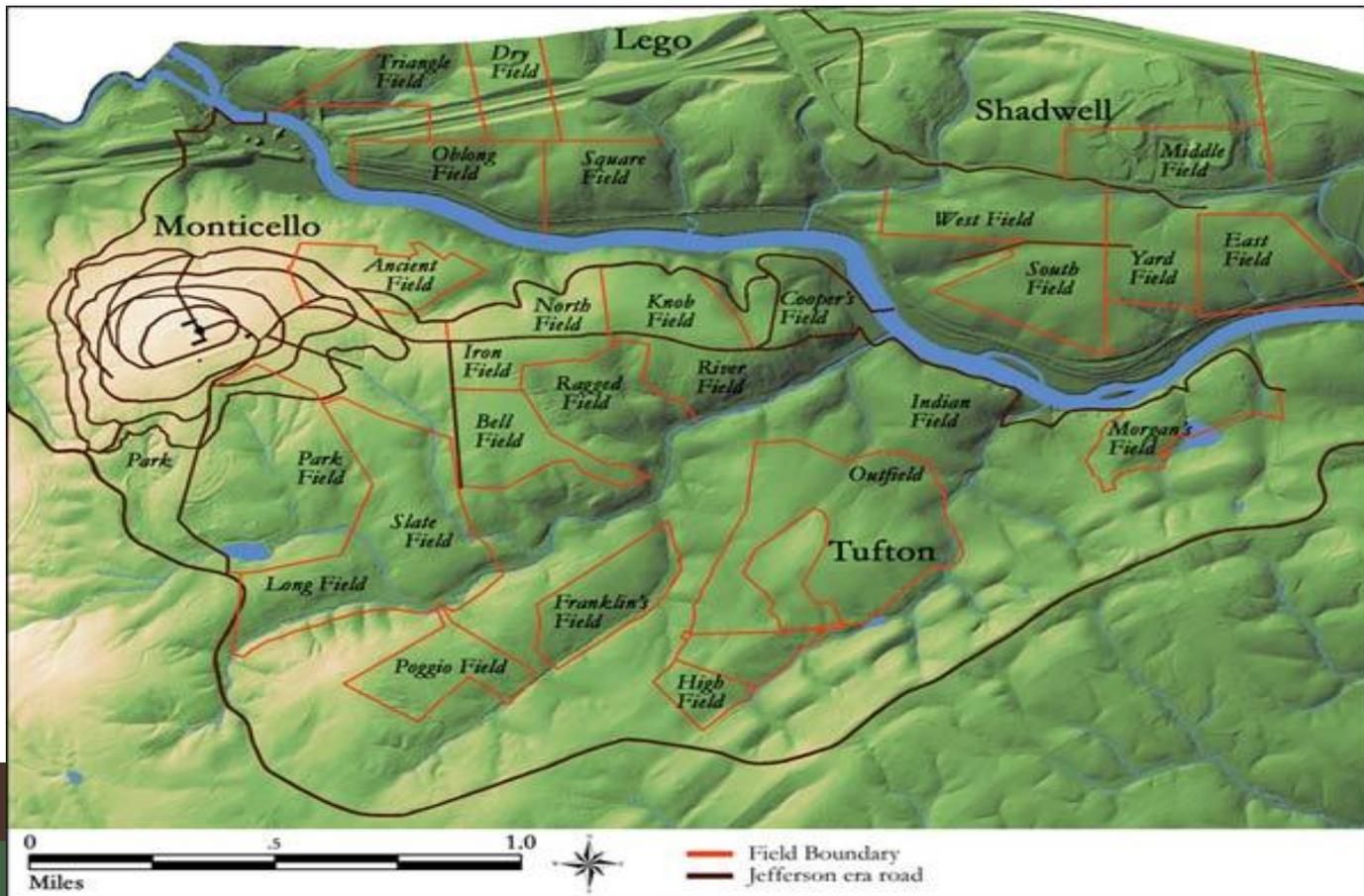
Buffer zones -If necessary should be on the map, indicated by size of buffer zone and whether there are any mitigating factors (e.g. row of trees)



OSP  
d.

RECORD  
Farm Map

Farm Map of Thomas Jefferson's Monticello-  
*"Cultivators of the earth are the most valuable citizens."* (Thomas Jefferson to John Jay, Aug. 23, 1785)





OSP  
d.

RECORD  
Land use

## d. records for verification of land use history

### Land Use History Verification Organic Producer

**Name: Crop Production Year:**

I, , declare that the parcel(s) of land described below were farmed by me or were under my control during the crop years of to. I also declare that during this time, to the best of my knowledge, there were no herbicides, pesticides, fungicides, fungicide treated seed, synthetic fertilizers, or other prohibited materials applied to this land. . . .  
**continued.**

**See- ATTRA Publications**

Land Use History Verification Form:  
Is used to verify that land has not received applications of prohibited substances in the previous 36 months. Also used when property/land has been rented or owned for less than 36 months. In such cases, the landlord or previous owner must fill out and sign the form.



OSP  
d.

RECORD  
Land use

## d. records for verification of adjoining land use

Neighbor Notification Letter-

Used to establish the integrity of fields bordering low-risk conventional land.. can be combined with Adjoining Land Use Verification Form.

(see ATTRAs forms)

Dear (Name):

I am currently a certified organic farmer with (name of your certifying agent), managing my fields consistent with the USDA National Organic Standard. Since you are an adjoining property owner, I need to inform you of my plans and ask for your help. . .

Continued

**See ATTRAs Forms**



OSP  
d.

## d. records for organic crop production

- Seeds & Transplants (including cover & pasture)
- Receipts of seeds & transplants delivered to farm
- Invoices for seeds & transplant purchases
- Phone logs of attempts to obtain organic seed & transplants
- Seed catalogs
- Letters from seed suppliers re: availability of organic seed
- Organic certificates for seeds purchased

For seed savers-

- harvest records showing production of organic seed
- Seed treatment records
- Verification from supplier that non-organic seed is not genetically modified. (Only for seeds that have commercially available GMO seeds . . . e.g. corn, soybeans, sugar beets)



RECORD  
PRODUCTION

OSP  
d.

## d. records for organic **crop** production and harvest/storage

- Farm activity log
- Invoices for contracted services (e.g. seeding, mowing, spreading manure)
- Records of cultivation practices, weeding and planting dates
- Compost production records

- Yield records (e.g. pounds harvested, weight tickets, boxes harvested)
- Receipts from processor or warehouse for delivery of organic product
- Custom harvest records
- Clean truck affidavits





OSP  
d.

RECORD-  
example

# CLEAN TRANSPORT AFFIDAVIT

## CLEAN TRANSPORT AFFIDAVIT

Grower/Business Name:

Date transport unit loaded:

1. Type of transport: farm wagons farm truck bulk semi trailer, common carrier tanker, other (specify)
2. The transportation was arranged by: grower, buyer, other, . . .

continued, See ATTRA Forms



OSP  
d.

RECORD  
SALES

## d. records for organic crop production- Sales Records

- Deposit records, ledgers, receipts
- Purchase orders
- Invoices
- Sales summaries from wholesalers or processors





OSP  
d.

RECORD  
LIVESTOCK

## d. records for organic **livestock** production

### FEED RECORDS-

- Organic verification for all purchased feed, including grain, hay, or silage (copy of organic certification)
- Grain invoices w/ weights from grain co.
- Records of purchased feed supplements, and animal health care products
- Feeding records
- Harvest & storage records for feed grown on farm, labels & purchase records

### Origin of Livestock Records:

- Breeding, birthing and weaning records (e.g. calendar, chart, notebook)
- Invoices, receiving records, and organic certification for all purchased animals



Step  
2



RECORD  
Livestock

OSP  
d.

## d. records for organic livestock production

### Animal health care records:

- Loss/cull records
- Medication records
- Vaccinations
- Somatic cell counts

### Livestock Living Conditions & Pasture Records:

- Animal Identification records
- Grazing records
- Records of inclement weather
- Temporary confinement records (with description of what allowable condition existed)
- Pasture rotation records





OSP  
d.

RECORD  
Livestock

## d. Records for Organic Livestock Production

### Production Records:

- Date & weight at slaughter
- Milk production records
- Egg production records





OSP  
d.

RECORD  
Handler  
Receiving

## d. organic handler & processor records

**Receiving Records-**  
(records that verify  
product received as  
organic and amount)

- Organic certificate for each product/ingredient received
- Clean truck affidavit for bulk product (verify truck was clean prior to hauling)
- Invoices, PO's, bill of lading, scale ticket
- Handler organic certificates and contracts
- Certificates of Analysis or Product Specification Sheets
- Raw Product inventory reports and records
- Weight tickets, receipts, tags



RECORD  
Handler  
Storage

OSP  
d.

## d. organic handler & processor records

**Storage & Production Records-** (describe handling and processing activities)



- Non-organic ingredient records
  - Recipes & product formulation
  - Ingredient usage reports & production logs
  - Quality control records
  - Reconditioning, shrinkage, & dumping records
  - Container, storage and processing area records
  - Purchased inputs, including ingredients, sanitizers, food contact substances, packaging, pest management materials
  - Inventory reports/Packaging reports
  - Product labels
- (PDP and information panel)



OSP  
d.

RECORD  
Handler  
Shipping

## d. organic handler & processor records

**Shipping Records-** verify  
type & amount of organic  
product shipped

- Pallet/tote tickets & sale tickets
- Certificate of analysis
- Purchase orders & sale journals
- Finished product inventory report & records
- Shipping logs & bills of lading
- Export records & transaction certificates
- Sales, accounts payable, accounts receivable, and cash disbursement journals
- Broker's contracts and statements
- Phytosanitary certificates



Step  
2



OSP

# The Organic System Plan (OSP)

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- e. **Management practices to prevent commingling and contamination;**
- f. Other information deemed necessary by the certifier



OSP  
e.

## e. management practices to prevent commingling and contamination

- Buffer zones to prevent contamination
- Establishment of a physical barrier (e.g. row of trees) to prevent drift of prohibited substances

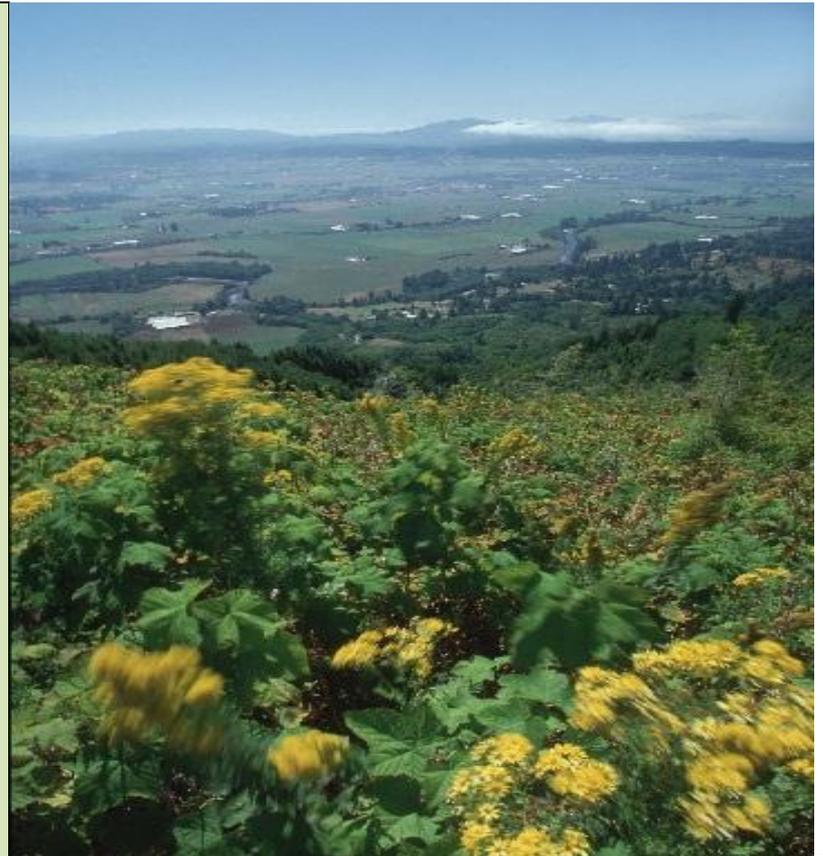




OSP

e. management practices should show-  
verification of adjoining land , , ,

- adjoining land use:
  - Natural areas and non-cultivated areas – no buffer required
- How pesticides are applied in adjoining land can determine the size of buffer?
  - Backpack sprayer
  - Boom sprayer
  - Airblast or speed sprayer
  - Aerial application
- Type of materials applied
  - Mosquito control often uses fogging sprays that are designed to drift





OSP  
e.

e. management practices to prevent commingling and contamination, cont.

- Procedures for notification of neighbors and road departments
- Procedures for identifying organic products during harvest, post harvest handling, shipping, processing and distribution





OSP

# The Organic System Plan (OSP)

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- f. **Other information deemed necessary by the certifier.**



OSP

f.

f. other information deemed necessary by the Certifier. This may include:

- Name(s) of previous certifying agent(s) and years applied.
- Results of previous applications for certification. (Copies of denial of certification, non-compliances, and/or other adverse action notices).
- A description of actions taken to correct non-compliances, plus evidence of corrective action.

Step  
1



# The Organic System Plan

- See OSP templates/forms available on ATTRA
  - And check out the new pasture management plan coming soon!
  - <http://www.attra.org/organic.html>
- §205.201(b) “A producer may substitute a plan prepared to meet the requirements of another Federal, State or local government regulatory program for the organic system plan: Provided, That, the submitted plan meets all the requirements of this subpart.”



Application

## Applications for Organic Certification also include the following items:

- Applicable fees charged by the certifying agent
- A signed operator agreement, identifying the responsible party and appropriate business structure:





Operator's  
agreement

## Operator Agreement must state-

- The Operator will comply with the Act and appropriate parts of the regulations.
- Establish, implement, and update annually an Organic System Plan
- Permit on-site inspection during business hours
- Maintain all records applicable to the organic production for not less than 5 years and allow the certifier access to these records during normal business hours for review and copying



Operator's  
agreement

## Operator Agreement, cont.

- Must identify the responsible party and appropriate business structure:
  - Sole proprietorship
  - Partnership
  - Corporation
  - Non-profit organization

- Must be signed by responsible party and identify other contacts:
  - Owner
  - Farm manager
  - Quality control personnel
  - Consultants



# Five Steps to Certification

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- A decorative graphic on the left side of the list, featuring a stylized, colorful design with yellow, orange, and red tones, resembling a musical note or a stylized letter 'S'.



## Step 2: Review of Application

1. Is the application complete?
2. Have the immediate areas needing attention been identified?
3. Does it appear that the applicant complies with the organic standards?
4. Is the farm/business licensed to operate?
5. What is the operation's legal status?



# Review of Application, cont.

- Has the operation been previously certified?
- Are there any records of denied certification, suspension, revocation, previous violations that have not been resolved.
  - Are there any outstanding issues from previous year (Non-compliances, conditions for continued certification)?
  - Dual Certificate(s)?





The  
Review

# Before Review of Application – the ACA must ask:

Do I have the expertise to evaluate the operation for compliance with organic standards?

- Example – aquaculture, mushroom production,

Do I have the administrative capacity?

- jurisdictional authority, do we operate in the area, understand the language?





The  
Review

# Review of Application, cont.

- Certifiers are required to review the application within a reasonable time.
- If Organic System Plan, operator agreement, maps, etc. are incomplete then the certifier contacts the applicant to obtain additional information.
- If incomplete, then possible NONC and denial of certification.
- Once the application is complete it can then be forwarded on for inspection.





# Five Steps to Certification

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The  
Inspection

# Step 3: The Inspection

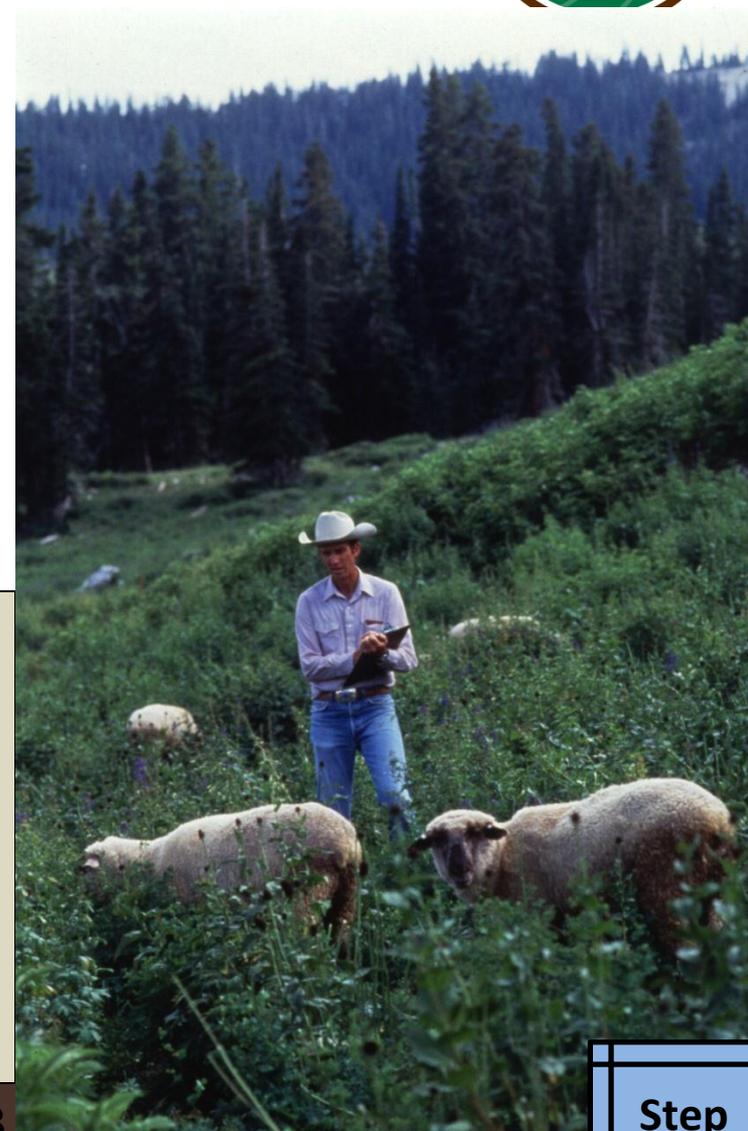




The  
Inspection

# The Inspection

- If the application and OSP are judged to be complete the certifier assigns an organic inspector to inspect all relevant areas of the farm.
- The inspector looks for all indications that the producer is operating according to their OSP and is in compliance to the NOP standards.





# On- Site Inspection- Preparing

## Inspector contacts and

- Schedules a date and time. Informs the applicant of what records will be reviewed, who the inspector needs to interview.
- § 205.403(b) Scheduling (1) The initial on-site inspections must be conducted within a reasonable time following determination that the applicant appears to comply or may be able to comply . . .  
(2) . . . [it] must be conducted with an authorized representative of the operation who is knowledgeable about the operation. . . And at a time when **land, facilities and activities demonstrate the operation's compliance.**



The  
Inspection

# On- Site Inspection

## Components of the Inspection

Inspectors role is to verify compliance with organic standards and identify violations or non-compliances.

**Beginning  
Meeting**

**Farm/Facility  
Tour to Verify  
Plan**

**Review  
Records and  
Conduct Audit**

**Exit Interview**

Organic inspections are usually between 3-6 hours per operation depending on complexity of operation and preparation of operator



The  
Inspection

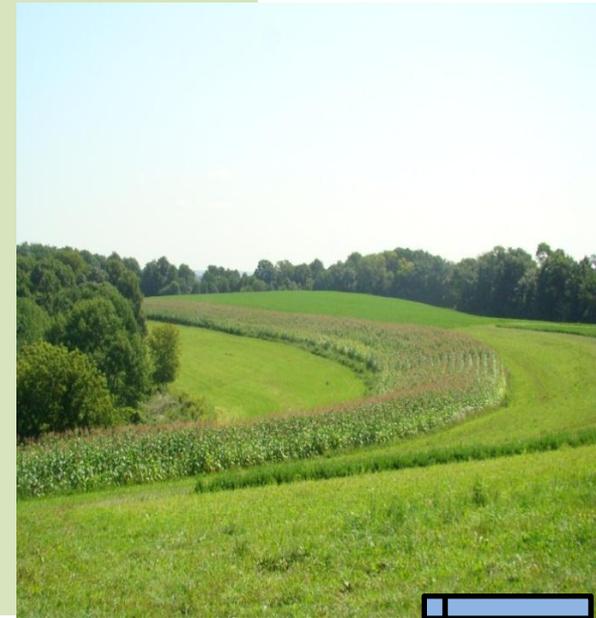
# On- Site Inspection Components of the Inspection

The Inspector will:

- 1) Compare the information in the Organic Systems Plan to the Operation
  - Is it accurate?
  - Is it complete?
  - Any new information?

2) Look at:

The fields, farm implements and buildings, borders and adjoining land use, assesses contamination and commingling risks





The  
Inspection

# On- Site Inspection

## Components of the Inspection

### 3) Collect Information

- Interview staff
- Tour entire operation
- Record observations
- Review/audit records

4) Hold an Exit Interview to go over observations and any areas of concern including any possible violations found.



The  
Inspection

# The inspector reviews all written records documenting management practices

- Seed sources
- Inputs used
- Compost production
- Conventional production done on the farm
- Storage
- Transportation
- Field activity logs (cultivation, weed control, manure application, spraying, pruning, beneficial's released)
- Harvest records
- Sales
- Field history/land use







# Five Steps to Certification

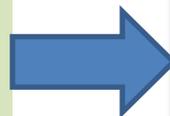
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evaluation

## Step 4: Evaluation and Recommendation for Approval

The OSP, application and inspection report are all reviewed by an individual or certification committee with expertise in organic production and certification standards.



Inspector of operation cannot make the certification decision  
Inspectors may conduct reviews of operations that they did not inspect.



evaluation

# EVALUATION

Compare all information and make determination of compliance with the NOP standards

The Reviewer will-

- Review correspondence from application;
- Review, read and evaluate inspection report;
- Review Organic System Plan and compare with inspection report;
- Issue recommendation regarding certification.





# Five Steps to Certification

- 
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certification  
decision

# Step 5: The Certification Decision

## For New Applicants:

- Approval for organic certification
  - May include conditions for minor, non-violative issues (establishment of adequate buffers, development of compliant labels).
- Request for additional information
  - Inspector identified the need for additional information
- Notice of noncompliance
- Denial of Certification (must be preceded by a Notice of Noncompliance or be a combined Notice of Noncompliance and Notice of Denial)



certification  
decision

# Step 5: The Certification Decision

## Renewal of certification -

- Continuation of organic certification
  - May include request for additional information within a prescribed time frame. If additional information is not received it should lead to a Notice of Noncompliance.
- Request for additional information prior to issuing an updated certificate
- Notice of Noncompliance
- Notice of Proposed Suspension or Revocation (must be preceded by a Notice of Noncompliance or be a combined Notice of Noncompliance and Notice of Proposed Suspension or Revocation)



## Certification -Certificate

- The certificate is the legal document issued by the certifier showing the operation is in compliance with the regulations.
- The certificate is a public document and is required to specify the following (§ 205.404(b)):
  - Name and Address of operation
  - Effective Date of Certification (the date the operation was initially certified)
  - Categories of the Operation (example: crops, wild crops, livestock, or processed products)
  - Name, Address and telephone number of certifying agent
- The Certificates should be issued in English and also specify:  
organic products certified; issue date of certification; anniversary date ;  
label classification for organic processed products; The statement-  
“Certified Organic under the US National Organic Program 7 CFR Part 205”  
and the statement- “Once certified, a production or handling operation’s  
organic certification continues in effect until surrendered, suspended or  
revoked”



# Examples for Denial of Certification

- OSP is complete, but there's no operator agreement
- Field inspection indicates compliance with organic standards, but there are no records
- Map doesn't describe/indicate any buffer zones
- Reviewer cannot determine that material complies with organic standards



# Continuation of Certification

## Follow up and notification of changes

- Annual Process (§205.406)
  - Process repeated every year
  - Updated Plan every year
- Changes requiring notification prior to annual renewal
  - Operator applied a prohibited substance to any field, production unit, product or site in organic production, whether it was a direct application or drift from neighboring area.
  - Operator wants to use a new type of fertilizer, crop production aid, or pest control material that is not included in your Organic System Plan.
  - Operator wants to add acreage or add a site to organic production.



## Examples of situations that would require immediate notification to the certifier

- Operator wants to remove a site or a portion of a site from organic production.
- Operator would like to develop a new label for an organic products.
- Operator wants to purchase organic crops or products from other producers to resell.
- Operator wants to start processing organic food products or handle organic products produced by other organic producers;
- Operator decides to change any portion of a certified operation that may affect compliance with the National Organic Standards.

# QUESTIONS?

