

Ohio Ecological Food and Farm Association (OEFFA)



OEFFA Certification Policies & Procedures

February 2010

Purpose

The purpose of this manual is to provide details and instructions for the certification process and to share OEFFA Certification policies and procedures with our clients. The USDA National Organic Program (NOP) Standards can be found in the accompanying book labeled as such. OEFFA's policies spelled out in this book serve to interpret the NOP rules and to make clearer sections of the regulations that are often misinterpreted or otherwise problematic. Since our policies are also written in technical language to some degree, additional explanation is provided in common language, where appropriate (*in italics*). We value the feedback our clients provide on the certification process, our services, and on our publications; please do not hesitate to contact us with any questions that arise from your review of this manual.

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ORGANIC CERTIFICATION PROCESS & PROCEDURES

Certifying your operation to the National Organic Program standards takes a commitment on your part to fulfill the requirements and time and effort on the part of the staff to verify compliance. However, the process needn't be difficult or daunting and OEFFA works closely with our clients to make the process as straightforward and transparent as possible.

The Organic System Plan (OSP)

The process begins when a producer submits an Organic System Plan (OSP) to our office (see the first sheet of the application packet for applicable deadlines and fees). This document is the cornerstone of the certification process; it should present a complete and accurate picture of your plans for your operation for the year. As your plans change or as conditions warrant, updates may be made directly to the OSP or as supplementary documents submitted to the office throughout the year. Please keep a copy of the OSP and all supporting documentation in your files. Different forms are used for different types of operations, such as farm, livestock, wild crop, on-farm handling, and handling. These forms are used to satisfy the NOP requirement for an Organic System Plan. The OSP must be submitted annually is used by staff and inspectors to verify compliance with the NOP rules. Every three years, growers must complete the *Organic System Plan for Producers* in its entirety. However, you may use the shorter update form, the *Organic System Plan Renewal*, to update your information in intervening years. Producers must submit certification fees along with the OSP annually.

Pre-Inspection Review

Upon receipt of your OSP, OEFFA Certification staff will review it for completeness and compliance with the NOP. You may be asked to supply additional information at this time to complete the OSP, to verify compliance with the rules, or to resolve minor noncompliances. Requests for further information and noncompliance letters are common; please do not be unnecessarily concerned if you receive one. The letter will indicate what OEFFA needs from you to move your file to the next step and the timeline in which we need to receive the information. OEFFA will notify you in writing when your application is complete and ready to go to an inspector.

On-Site Inspection

OEFFA Certification works with organic inspectors who are independent contractors. We send client files with complete OSPs to inspectors based on a number of factors including types of products requested for certification, nature of the operation, geographic location, and previous inspections. Although the timing of your inspection may be affected by these factors, considering them allows us to control our costs and thus to keep fees to clients low and avoid the need to bill inspection costs separately (except in rare circumstances). The initial inspection must occur before harvest to verify your OSP but subsequent inspections may occur before, during, or after harvest in order to observe relevant activity on the farm each year. An inspector will contact you to schedule an on-site inspection of your operation at a time that is convenient for both you and the inspector. The operator must make an effort to schedule this inspection in a timely manner and you may cancel a scheduled inspection appointment only for emergency situations. During the inspection, the inspector will survey the operation, review your records and recordkeeping practices, ask for documentation to verify compliance with the rule, and complete a report verifying the information

in the OSP you submitted. The inspector does not make the final certification decision and cannot assist you in achieving compliance with the NOP.

Final Review & Certification Decision

Following your inspection, the inspector will return the completed inspection report to the certification office. Staff will review your OSP, the inspector's report(s), and all other supporting records. Additional information may be requested to complete fulfill requests by the inspector, to clarify issues or deficiencies discovered at the time of inspection, or to resolve minor noncompliances. A decision to grant, deny, renew, or suspend organic certification will be made based on all this information. If certification is granted or renewed a decision letter will accompany the certificate, which may request additional information to resolve noncompliances or to finalize the file for the year. It may also indicate that some noncompliances may be resolved before the next inspection. If certification is denied or suspended, you have the right to appeal as detailed in the NOP standards.

Timeframe

OEFFA Certification works hard to provide professional and timely service to all of our clients at a reasonable cost. The time it takes from application to decision varies based on a number of factors. In all cases, submitting a complete and accurate OSP and having complete and accurate supporting documentation on file for review by the inspector is the best way to ensure timely service. Each time more information is requested or a noncompliance is issued, it adds approximately a month to the process. If certification is needed by a certain date, please notify us of this at the time of application and request expedited service if necessary. If situations arise during the certification process, we do our best to accommodate requests for prioritization. We prioritize the inspection of new applicants, as the first inspection must take place prior to harvest. Generally, certification is completed for new applicants in 3 to 4 months, if the OSP is complete upon submission.

Which Form(s) Do I Need?

If you do not have the necessary forms or have questions about which forms apply to your operation, please contact the OEFFA Certification office. OEFFA will automatically send the appropriate forms for renewal of certification to operations certified the previous year. Here are some examples of the forms required for various kinds of operations:

Dairy Farm – Farm and Livestock

Layers and/or Broilers - Farm and Livestock

Grain Production, Hogs, and On-Farm Feed Mixing – Farm, Livestock, and On-Farm Handling

Grain Production and Food Products produced at a separate facility – Farm and Handler

Maple Syrup – Farm and On-Farm Handling

Greenhouse – Farm

Mixed Vegetables/Fruit with Berries harvested from wild plants – Farm and Wild Crop

Coffee Roasting – Handler

OEFFA ORGANIC CERTIFICATION POLICIES

Section I: Definitions

Commercial Availability - The ability to obtain or source a production input in an appropriate form, quality, or quantity to fulfill an essential function in the organic production or handling system, as determined by OEFFA in the course of reviewing the organic system plan.

Internal Control System (ICS) - A written quality assurance system included in a master Organic System Plan (OSP) that sets forth the practice standards, recordkeeping and audit trail requirements applicable at each production unit, facility or site and that identifies the internal verification methods used.

On-Farm—On the primary site of the certified organic land, managed by the producer who is certifying the land under his/her name.

Organic System Plan (OSP) - A plan of management that has been agreed to by the producer or handler and the certifying agent and that includes written plans concerning all aspects of agricultural production or handling. The OSP must be negotiated, enacted, and amended through an informed dialogue between certifying agent and producer or handler, and it must be responsive to the unique characteristics of each operation. The OSP is the forum through which the producer or handler and certifying agent collaborate to define, on a site-specific basis, how to achieve and document compliance with the requirements of certification. The OSP commits the producer or handler to a sequence of practices and procedures resulting in an operation that complies with every applicable provision in the regulations.

Production Unit - The portion of an organic operation where products are produced and/or handled post-harvest, including any sub-units located within geographic proximity. A production unit, including any sub-units located within geographic proximity, operates under the operation's organic system plan, and is managed through an internal control system to ensure compliance with all applicable provisions of the regulations. Each production unit within a production or post-harvest handling operation has defined location, practices, management and/or products.

Site - The location of management activities for a given production unit.

Sub-unit - A smaller discrete portion of a production unit, such as a field, plot, wild-crop harvest area, or distinct processing area.

Section II: General

1. Certificate Effective & Renewal Dates

Certificates are good until surrendered, suspended or revoked. The certification cycle is an annual process. The scheduled date of annual renewal is the date the initial certificate is issued (a.k.a. “effective date” or “anniversary date.”) This is the date from which all renewal and inspection dates should be calculated. OEFFA deadlines supersede the scheduled date of annual renewal in regards to submission of the OSP. In the event of non-renewal, the certificate will be considered valid until the scheduled date of annual renewal.

Even though Organic Certification is an annual process, your certificate does not expire after a year unless you chose not to renew.

2. Cleaners & Sanitizers

OEFFA Certification allows all cleaners/sanitizers for equipment and facilities that do not contain quaternary ammonium compounds. An intervening rinse must take place to prevent contact between cleaners and organic product, livestock, or land.

“Quat” compounds do not readily rinse from surfaces they are used to clean. To prevent contamination of organic products that contact these surfaces, we do not allow quats to be used as cleaners. Other cleaners are acceptable if rinsed before contact with organic products.

3. Confidential & Public Information

All information submitted to OEFFA Certification is considered confidential, except for information required to be released to representatives of the National Organic Program (NOP) and all information deemed to be public access by NOP. The NOP requires that certificates for the current year and three preceding years, and all the information contained therein, be available to the public. Confidential information from an applicant’s file may be released only with written authorization of the applicant.

If you would like your file to be discussed with someone other than yourself for any reason, please contact the office and request a Document Release Form.

4. Equipment Cleaning

Equipment must be cleaned between use in non-organic and organic production to ensure that no commingling or contamination of certified land or products occurs [NOP §205.272 (a)]. Documentation of the procedure(s) used and a log of the cleaning operations must be in place to verify compliance [NOP §205.103 (a)].

If you use equipment for both organic and non-organic production or handling, you must clean the equipment before used with organic products or land. Examples of adequate cleaning include:

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-Tillage and planting/transplanting equipment and other equipment with soil contact should be washed with water. High pressure air is not adequate.

-Spray equipment previously used with prohibited spray material or equipment in contact with seed treatment(s) should be washed with water and a cleaning agent followed by a clean water rinse. Nozzles should be removed and manually cleaned of any chemical residue.

-Equipment that is not readily washable (such as combines, balers, feed grinders, roasters) should be cleaned of residue manually or with high pressure air followed by a product purge.

5. “Grower Groups” (Operations with Multiple Production Units)

Application for certification as a grower group requires pre-approval by OEFFA Certification. Please contact us if you are considering this approach to discuss the fee structure, required documents, and related issues.

In order to be considered a grower group, the following conditions must be met:

- The crops and farming practices of all producers in the group must be uniform and reflect a consistent process or methodology, using only the inputs as listed on a single comprehensive Organic System Plan (OSP).
- The group must be managed as a legal entity under one central administration. Producers who are certified as part of a grower group shall not possess individual certificates. Rather, the grower group shall be certified as a unit.
- Grower groups must ensure that all members understand the USDA National Organic Standard and how it applies to their specific operations.
- Grower groups must utilize centralized processing, distribution, and marketing facilities and systems. Participation in the group shall be limited to producers who sell all of their organic product through the group.
- Recordkeeping protocols must be consistent. It shall not be acceptable that individual production units, sites, or facilities differ in their methodology of recordkeeping.
- The producer group operation must establish and implement an Internal Control System (ICS), with supervision and documentation of production practices and inputs used at each sub-unit, and collected at each production unit, site, or facility to ensure compliance with the USDA’s National Organic Program.

The Role of the Internal Control System (ICS)

An Internal Control System may also be called an Internal Quality System, and is analogous to the function of the Quality Assurance department of a large operation. Its mandate is to maintain consistency in compliance with the regulations as well as more traditional product quality concerns. The various components of a producer group operation all are governed by the same Organic System Plan, and the ICS must maintain sufficient oversight to ensure that all personnel are consistently following the plan. It is in the interest of this body to safeguard the organic status of the entire operation and the eligibility of the group as a whole for organic certification.

Within a production unit, the administrator of the Internal Control System is charged with conducting surveillance and reviews of every smallest divisible part of the production unit, site or facility every year. For instance, for a single sub-unit of a farming operation that is made up of multiple production units, the ICS surveillance and review should focus on critical organic control points such as buffer areas, condition of growing crops, soil quality indicators, input and equipment storage areas, and level of understanding of organic requirements by the operator(s).

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While it is OEFFA's role to inspect at the level of production units, sites, and facilities and ensure that the ICS is functioning properly, the administrator peers deeper into each of these production units, sites or facilities. For the operation seeking organic certification to be in compliance with the NOP, all non-compliances detected at the production unit, site, or facility or at the sub-unit or member level are required to be reported to the certifier (per §205.400 (f)). All notices issued by OEFFA Certification for non-compliances perceived at the ICS or sub-unit level will be issued to the group as a whole.

For each grower group OEFFA certifies, OEFFA shall determine whether all or a portion, but no less than 1/3, of the production sites shall undergo inspection through a documented process which takes into consideration the following:

- The number of operations participating in the grower group;
- The size of the average operation in the grower group;
- The degree of uniformity between the group's operations;
- The complexity of the group's production system(s);
- The management structure of the group's ICS;
- Any noncompliance(s) issued from the previous year (if renewing certification); and
- Which particular sites were inspected in previous years (if renewing certification)

6. Input Evaluation (Materials Review)

All products must be reviewed before a certified producer uses them; use without pre-approval is considered non-compliant and, depending on the nature of the product and use, could lead to suspension or denial of certification of the affected land, animals, and/or products. OEFFA reviews products in the process of reviewing OSPs to protect the integrity of the organic food system and for the benefit of producers we certify. Reviews of new products are only conducted under the following conditions: a) the product is submitted on or with an application for certification; b) a grower submits a request directly; or c) a manufacturer submits a request with a substantiated claim that a certified grower desires to use the product. OEFFA does not offer a fee-for-service review program. As such, the Approved Products List (and the information contained therein) is not to be published or used for marketing purposes in any way. We also generally accept product approvals made by the Organic Materials Review Institute (OMRI).

List all inputs you will use on your OSP. Before using new products check the OEFFA and OMRI lists to see if they are pre-approved. If a product is not on either list, please contact the office before you use it and we will evaluate it for compliance with the NOP. We are happy to conduct product reviews for clients throughout the year.

7. Multiple Individuals and/or Sites on One OSP

Each operation OEFFA certifies must submit an OSP and the accompanying fee annually. An "operation" may be an individual, family, partnership, cooperative, LLC, or corporation. The criteria for multiple individuals or locations to be certified as a single operation are as follows:

- The OSP submitted must describe the management of the entire operation, including all crops, livestock, and products at all phases of production, all inputs, infrastructure and equipment, conservation practices, pest management, transportation, and sales and marketing.

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- Decision-making and finance must be centralized and coordinated as a single entity.
- One set of records and audit trail must be kept at a central location as to be available for inspection.

If applicants do not meet these criteria, they will be considered multiple operations and must certify separately, with multiple fees, OSPs, and certificates. In order to certify together, complex operations on a single OSP with multiple operators and/or sites may be required to certify as a grower group. For more details on grower groups, see the grower group policy on pages 5-6 of this manual.

Multiple family members or neighbors may certify together only under limited circumstances. If the multiple individuals or locations do not operate as a single entity, they must certify separately. If an entity contains many individuals and/or is very complex, we may require that it develop an internal control system and certify as a grower group.

8. Recordkeeping (§205.103, §205.201(a)(4)).

All organic producers and handlers are required to maintain detailed records regarding the production, harvesting, and handling of organic products. A recordkeeping system which is readily understood and auditable must be developed and maintained in a manner which demonstrates full compliance with the NOP standards. All records must be made available at the time of inspection and upon request by OEFFA staff. Records must be maintained for no less than 5 years.

The NOP sets a high standard for recordkeeping. Records should trace crops from seed to sale, livestock from birth or purchase to death or sale, and products from raw ingredients to sale. If complete and accurate records are not in place or adequately maintained, a noncompliance will be issued, which may delay the certification process.

9. Transaction & Export Certificates & Equivalency Agreements

A. Transaction Certificates (TCs)

The TC is part of the audit system to track certified organic products from the grower to the end user. The TC verifies the origin of the product and that the product was grown in accordance with NOP standards. A TC is not required by OEFFA Certification but is available if required by the purchaser or preferred by the producer. Prior to issuance of a TC, the seller must complete a *Transaction Certificate Application* (TCA) and send to OEFFA with the appropriate fee. A TC is prepared and the original is sent to the buyer with a copy to the seller.

B. Equivalency Agreements and Export Certificates

If you require an export certificate for organic product(s) covered by one of the following equivalency agreements, please contact the office and we will provide you with the proper paperwork. Please see our current fee sheet for current export certificate fees.

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JAPAN

agreement with Ministry of Agriculture, Forestry and Fisheries (MAFF)

Organic products exported to Japan must be accompanied by an export certificate (TM-11). The following statement must be verified by OEFFA and accompany the exported product:

- For All Products: “Products covered under this export certificate are not known to be produced with alkali-extracted humic acid or lignin sulfonate as a flotation agent.” [note: two substances were removed from this list October 10, 2008]

TAIWAN

agreement with Agriculture and Food Agency of the Council of Agriculture (AFA/COA)

Organic products exported to Taiwan must be accompanied by an export certificate (TM-11). The following statements must be verified by OEFFA and accompany the exported product:

- For Processed Products and Crops: "Organic agricultural products and organic processed products, accompanied by this certificate, were produced or processed using zero prohibited substances."
- For Livestock and meat products: “Organic livestock products, accompanied by this certificate, were managed and produced without the use of systemic pain killers or analgesics, including the use of Lidocaine or Procaine.”

CANADA

agreement with the Canadian Food Inspection Agency (CFIA)

On June 18, 2009 USDA and CFIA signed an agreement that recognizes each country’s organic standards as equivalent. Under this equivalency agreement, any raw agricultural products grown without sodium (Chilean) nitrate or processed products certified to the USDA NOP standards are not required to obtain additional Canadian certification. Effective July 1, 2009, raw produce to be exported to Canada must be produced in fields designated free from the application of sodium nitrate during that growing season (no three-year transition is required). OSPs must be amended, records kept, and the OSP must be auditable to support this. Agricultural products used in processed products are not subject to this restriction.

10. Treated Lumber (§205.206(f))

Wood or lumber treated with prohibited materials is prohibited for all applications where direct or indirect contact with certified land, animals, or products may occur. Infrastructure made from or with treated wood that exists on the premises before organic management begins may remain, but all repair, replacement, and new construction must be done with compliant materials. Coatings and/or physical barriers that prevent direct and indirect contact of treated wood with certified land, animals, and products may be approved, on a case-by-case basis, if there is sufficient evidence that the coating or barrier will a) prevent said contact over the life of the structure, b) not contribute to the contamination of any certified entity with prohibited substances c) not contribute to contamination of crops, soil, or water. If any of these conditions are not met, an appropriate buffer may be established between the noncompliant structure and the certified growing area, animal, or product. Adequate buffers will be determined based on the nature of the operation, potential for contamination, and on-site evaluation by the inspector.

Treated lumber is prohibited by the NOP rules for new construction and replacement/repair. We have not reviewed any treated lumber product that is acceptable for use in organics. Use of treated lumber will result in a noncompliance and additional efforts will be necessary to prevent contamination of organic products and land.

Section III: Crop

1. Annual Seedlings (§205.204(a))

The producer must use organically grown annual seedlings (except under the conditions outlined at §205.204(a)(3) & (a)(5)). If the seedlings are grown off-farm, they must be (1) grown on a certified organic operation or, (2) they must be grown in a facility where the producer is ultimately responsible for the management of the seedlings. A non-certified facility where seedlings are grown must be managed following the NOP standards, documented in the OSP, and must be inspected. The certified producer must source and supply input materials, including but not limited to seeds, soil mix, fertility products, foliar sprays, pest and disease management inputs. All inputs must be approved by OEFFA Certification and must be documented in the OSP.

All seedlings used to produce certified organic crops must be organically grown except in very rare circumstances (see citations, above). It may be acceptable for seedlings to be grown organically in a non-certified facility, but that facility must be included in the OSP and inspected.

2. Additions of Crops or Land to the OSP & Certificate (§205.403(a)(1)-(2))

Land must be inspected by a third-party inspector before crops grown on that land can be added to the organic certificate.

- A. New crop(s) on land previously included in an OSP and inspected may be added to the certificate immediately with adequate documentation on all inputs including seeds, fertilizers, and pest control products. This may be accomplished by submitting this information with the annual OSP or, if outside the regular application-inspection cycle, by completing an *Additional Crop-Livestock Affidavit*. Staff will review the information submitted and, if in compliance, issue a revised certificate.
- B. Crop(s) on land not previously included in an OSP, inspected, or certified require a *Prior Land Use Affidavit (PLUA)* or other verification that the land has received no application of a prohibited substance for three years. Certification may be achieved in one of two ways:
 - i. Verification of prior land use, inputs, and management may be submitted along with the OSP. An inspector will verify the information during the annual inspection.
 - ii. Outside the regular application-inspection cycle, the verification of prior land use must be accompanied by a completed *Additional Crop-Livestock Affidavit*. A third-party inspector will be assigned to conduct a spot inspection at the expense of the producer in order to verify that the new land is in compliance.

The inspector will follow the guidelines in *OEFFA Organic Certification Pre-Inspection & Inspection Procedures* and staff will make a certification decision based on information submitted by the producer and the inspector's report.

All land must be inspected before crops grown in it can be certified. If you need a new crop grown on previously-inspected land added to the certificate, we can generally do so immediately with adequate documentation on the inputs and management; please contact the office for details. If you have a new field that needs added to the certificate, you will need to wait for your regular inspection or schedule a spot inspection, at additional cost, to verify compliance.

3. Manure, Compost, & Compost Tea

Producers using animal manure as a fertility input must follow the restrictions set forth in §205.203(c)(1) unless it is composted according to the definition in §205.2 and meets the criteria described in §205.203(c)(2) or by meeting the criteria described in the NOP policy document on Processed Animal Manures of July 16, 2007.* To determine initial C:N ratio, data provided by the producer of the compost may be used, or standard feedstock C:N ratios supplied by Ohio State University Extension will serve as our reference point (+/- 5%). Pursuant to §205.203(c)(3), “compost” containing no animal manure may be used as compost (if it meets the criteria in §205.2 & §205.203(c)(2)) or as uncomposted plant matter (per §205.203(c)(3)) as long as it is not made from prohibited feedstocks. Vermicomposts must be made from allowed feedstocks with aerobic conditions and 70-90% moisture maintained throughout the composting process; duration must be 12 months for outdoor windrows, 4 months for indoor container systems or angled wedge systems, or 2 months for Continuous Flow Reactors (per NOSB recommendations of October 19, 2006). All on-farm composting should be documented in the OSP and verified during the inspection to comply with §205.203(c)(2).

Compost extracts or “teas” must be produced from an approved compost (see above) and potable water and may be used for fertility (§205.203(c)(2)) or pest (§205.206(b)(1)) & disease (§205.206(d)(2)) control. If made without additives, compost tea may be applied without further restriction except that foliar applications to leafy greens are not permitted. If additives are used, the tea must meet the conditions set forth in the NOSB recommendations of October 19, 2006. A compost tea made from product that does not meet the definition of “compost” or “vermicompost” herein (even if made without manure) shall be subject to the restrictions of 90 days before harvest if applied as a soil drench for crops with no soil contact, or 120 days otherwise.

All applications must follow §205.203(c) and must not “contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances.” If manure is applied to frozen ground, careful attention must be paid to slope, proximity to a waterway, drainage, ground cover, presence of snow, and any factors that may encourage contamination of waterways.

*“Processed manure products must be treated so that all portions of the product, without causing combustion, reach a minimum temperature of either 150° F (66° C) for at least one hour or 165° F (74° C), and are dried to a maximum moisture level of 12%; or an equivalent heating and drying process could be used. In determining the acceptability of an equivalent process, processed manure products should not contain more than 1x10³ (1,000) MPN (Most Probable Number) fecal coliform per gram of processed manure sampled and not contain more than 3 MPN Salmonella per 4 gram sample of processed manure.”

- *Manure that is not composted to meet the strict guidelines in the NOP is considered “raw” and its use is restricted. If the product is to be used for human consumption, it must be applied to 90 or 120 days before harvest, depending on the crop (crops used for livestock feed are exempted).*
- *Compost “teas,” even if made without manure, may also be subject to this restriction. No foliar application of compost teas to leafy greens is permitted.*
- *We do not recommend that OEFFA-certified producers spread manure on frozen ground. If no part of the NOP rules is violated, under certain circumstances and with careful consideration, it may be acceptable to do so.*

4. Seed Sourcing

NOP §205.204(a)(1) states that non-organically produced, untreated, non-GMO seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available.

A producer may determine that seed is not commercially available (based on (1) appropriate form, (2) quality, or (3) quantity) via a search of a minimum of three relevant seed suppliers to verify if organic seed from varieties meeting or equivalent to those trait selections is available. When comparing for an equivalent seed variety, consider comparable growing habits, days to maturity, insect resistance, disease resistance, flavor, milling qualities, etc., as applicable. Please note that cost of seed or shipping is not a valid reason for opting to use non-organic seeds if organic seeds are commercially available.

A good faith effort must be made each year to source organic seeds. Documentation of the attempts to source organic seeds is crucial and must be part of the audit trail.

When purchasing seeds, each grower must document a search for organic seeds. Once you have decided on the crops and varieties you want to plant, contact at least three seed sources that sell organic seed and ask for a variety that has the characteristics you are looking for. If none of these dealers carries organic seed with the qualities or in quantities you are looking for, you may purchase nonorganic seed that is untreated and non-GMO—make sure you receive documentation of this from the dealer. Cost may not be a factor in deciding whether to purchase organic or untreated and non-GMO seeds. OEFFA has a sample Organic Seed Search and Purchase Record available in our audit trail package, which you may request from our office.

Section IV: Livestock

1. Dairy Herd Conversions

A dairy herd conversion is intended to be a one-time opportunity for producers to implement a conversion strategy for an established, discrete dairy herd in conjunction with the land resources that sustain it. It is critical that the producer develop a management plan prior to beginning conversion. This is to clearly identify the feed program, the land resources that will sustain the herd, and healthcare inputs that will be utilized. It is recommended that an Organic System Plan be submitted (at which point it will be reviewed for compliance with the NOP standards) so as to avoid surprises during the certification process. When converting a dairy operation in accordance with NOP §205.236(a)(2), all animals of all ages must be identified and listed on the OSP. Separate entire, distinct herds may be converted at a later date with OEFFA Certification approval. During the conversion, records must be maintained of feed that is fed (including the grazing areas) and health care products that are administered. In essence, this herd in conversion must be managed exactly like an organic herd with the exception that during the conversion, third year transition crops and forages from the producer's own land may be utilized.

A herd of dairy cattle may be converted from conventional to organic over a one-year period on a certified or third-year transitional farm. The herd must include all animals of all ages. Additional herds may be converted with OEFFA approval, but individual animals may not be converted or re-converted to organic.

2. Physical Alterations

NOP §205.238(a)(5) states that physical alteration of livestock must be accomplished in a manner that minimizes pain and stress.

Mammalian Species

All planned materials and procedures must be listed in the Organic System Plan. Synthetic materials used for dehorning, relieving pain, etc. must be on the National list to be approved for use. At this time, there are no synthetic substances allowed for dehorning per §205.603.

Poultry

Minimal beak trimming is allowed for protection of the flock and must be done in a manner that minimizes pain and stress, no later than 10 days of age. De-beaking (severe beak trimming) is prohibited. Toe clipping/clubbing or other surgical alterations are prohibited.

There is no dehorning paste that we can approve under the current NOP regulations.

3. Teat Dips & Udder Washes (§205.238, §205.603)

Teat dips may be used on a daily basis as a treatment for chapped or damaged teats, to protect animals from post-milking infection, and for the promotion of food safety. All Udder Washes, Pre-dips, and Post-dips are to be classified as Livestock Drugs; all active ingredients must be nonsynthetic or listed at §205.603 for this purpose. Non-active ingredients may be considered approved "excipients" if they meet the criteria at §205.603(f). Pre-dips and udder washes may contain as excipients substances that are FDA approved as direct food additives. Common soap and water may also be used for an udder wash if the udder is thoroughly rinsed or wiped

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before milking. Allowed soaps include some hand and dish soaps without antibiotics. For Post-dips, we also consider FDA-approved “indirect” food additives allowable as excipients.

Producers must be careful when selecting all inputs to be used in their Organic system, but teat dips can be especially tricky. Please confirm with the OEFFA Approved Products List or the office before using a new or different teat dip. Some teat dips are restricted to use after milking only due to their ingredients. Soap and water may be used as an udder wash before milking, but please be sure the soap is not antibacterial and that the udder is rinsed and wiped after washing.

4. Treatment with a Prohibited Substance

Treatment may not be withheld from a sick animal in order to preserve its organic status, per NOP §205.238(c)(7). Any animal, including young stock, treated with prohibited drugs will permanently lose its organic status and may never return to organic production.

Animals treated with prohibited drugs must be clearly identified as separate from organic animals. All meat, milk or milk products from treated animals must be segregated from organic products and there must be clear documentation of the separation. Any dairy animal treated with prohibited drugs may not return to the milking herd, even if the animal is managed organically and remains on the organic farm. The milk from a treated animal may not be used to feed organic young stock except its own, provided the animal was managed organically during the last third of gestation.

Please note that organic animals that are taken to a non-organic farm lose their organic status and may not be 1) returned to organic status or 2) in the case of dairy animals be reconverted to organic status for milk production.

If an animal is sick you must treat it, even if that means it will need to be removed from the organic herd. Once an animal loses its organic status, it can never be certified again.

5. Vitamins & Minerals

Vitamins and minerals necessary to meet the nutritional requirements of organic livestock must be provided as part of the feed ration per §205.238(a)(2). Nonsynthetic and synthetic vitamins and minerals are allowed as feed additives in organic livestock feed and in oral healthcare and drug products if FDA approved per §205.603(d)(3). The AAFCO Annual Publication may also be used to identify acceptable vitamin and mineral feed additives. Injectable electrolytes and vitamins may be used in drug applications to treat an identified condition per §205.603(a)(8). All non-active ingredients (excipients) in these formulations must meet the requirements at §205.603(f). Synthetic vitamins are not on the National List for external use.

A list of vitamins and minerals approved as feed additives by FDA/AAFCO is available in the appendix of the OMRI Generic Materials List. Anything on this list may also be part of a healthcare product that is ingested orally. Injectable vitamins may be used as drug treatments and injectable electrolytes may be used to treat milk fever. However, you should be sure we have reviewed the complete product before you use it.

Section V: Handling

1. Improper Labeling of Products

When OEFFA discovers an error in labeling of an OEFFA certified organic product, a non-compliance will be issued to the operation and the operation must submit label corrections. Any incorrect labels that have not entered the stream of commerce may not be used if they include the following errors:

- (1) Improper use of the USDA NOP seal
- (2) Incorrect product classification such as if a “made with” product is labeled “organic”
- (3) Omission of the name of the certifying agent

Other errors will be reviewed on a case-by-case basis. Certified operations may continue to use labels with minor errors only for the time necessary to procure corrected labels, up to 90 days. OEFFA Certification and the operation must keep documentation of this in their respective files. Minor errors might include incorrect formatting or placement of information.

The OEFFA logo may be used to satisfy the requirement per §205.303(b)(2) if the phrase “OEFFA Certified Organic” is readable.

OEFFA (as an NOP accredited certification agency) does not have recall authority for product already in the stream of commerce. [NOP ACA Training June 2009]

2. On-Farm & Off-Farm Handling/Processing Operations

The categories below are guidelines. OEFFA Certification may require you to complete further paperwork, and the appropriate fees that accompany it, based on the complexity of the operation, if we feel we are unable to verify compliance with the NOP based on the documents listed below.

I) If an OEFFA certified organic producer also has a handling/processing operation on-farm and:

- A) The producer is processing crop/product for his or her own use:
The producer does not need to certify the handling/processing portion of the operation. The producer must follow NOP §205.201 (add the handling/processing to his/her OSP), §205.272 (protect organic products from contact with prohibited substances) and §205.103 (maintain records documenting the cleanout).
- B) The producer is processing crop/product for market:
The producer must complete the *OEFFA On-Farm Handling Organic System Plan* (at a significant fee reduction). The client will receive one organic certificate for both their farm and handling/processing facility.

II) If an OEFFA certified organic producer also has a handling/processing operation off-farm that s/he would like to certify:

This constitutes a separate operation, and the client must complete the *OEFFA Organic System Plan for Handlers*. In this scenario the client will receive separate certificates for their farm and handling/processing facility and will be subject to separate fees for each.

III) If an OEFFA certified organic producer also has custom handling/processing done:

- A) On-farm for his or her own use:
See IA above. The custom work must be fully documented in the OSP for Producers.
- B) On-farm for market:
See IB above. The custom work must be fully documented in the On-Farm Handling OSP.

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- C) Off-farm at a commercial operation:
The off-farm operation must be certified organic for the crop/livestock to maintain its organic status.

This policy is to assist staff and producers that handle organic products in determining which forms they must submit. Examples are as follows:

- IA: A producer grinds feed for his/her own livestock.
- IB: A producer processes sap to market organic maple syrup.
**Note: Exceptions may be made to IB for small amounts of product handled/processed on a non-commercial operation with OEFFA Certification pre-approval*
- II: A producer grows grains, and also owns a stand-alone mill 10 miles away s/he would like to certify.
- IIIA: A custom soybean roaster comes on-farm to roast a producer's soybeans for his/her own livestock.
- IIIB: A custom soybean roaster comes on-farm to roast a certified organic producer's soybeans, which the producer plans to sell.
- IIIC: A producer takes their soybean crop to a roasting facility before sale or use.

3. Rodent & Pest Control in Processing, Facilities, & Storage

Pest control for organic producers/handlers, as outlined in NOP §205.271, is a multi-tiered system. First, producers must use management practices to prevent problems before they happen. These include preventing access to facilities and organic products, removal of harborage, food sources and breeding areas by maintaining clean production, processing, and storage areas. When prevention is not enough, mechanical or physical means may be employed, although rodent snap traps may not be used in the production area of a processing facility. If problems persist, nonsynthetic materials and synthetic materials on the national list may be used. Placement and containment of these substances must be such that contact with certified products, land, or livestock is not possible. OEFFA Certification allows the use of bait boxes outside the facility, if there is no risk of contamination to the organic product. If the practices provided for above are not effective to prevent or control pests, a synthetic substance not in Subpart G—National List may be used, provided that the certified entity and OEFFA agree on the substance, method of application, and measures to be taken to prevent contamination of certified products. If NOP or OEFFA requirements conflict with any Federal, State, or Local health or safety regulations in any way, the certified operator should contact OEFFA to resolve the issue. For details regarding Federal and State emergency pest and disease treatment programs see §205.672.

Producers and handlers must try to prevent rodents and other pests from accessing facilities and organic products. If this does not work, techniques (such as trapping) and substances (such as Vitamin D3) that are approved for organic production may be used, in that order. If these also do not work, additional measures to prevent or remedy infestation may be necessary, please contact the office for details and pre-approval.