CREATING YOUR BEST ORGANIC SYSTEM PLAN

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NATURE’S INTERNATIONAL CERTIFICATION SERVICES

• Founded in 2005 by Dave Engel, Organic Pioneer and Dairy Farmer
• Accredited to the NOP in 2007
• Acquired by EcoCert Group in 2019 and now we are part of an international family of certification bodies
• Serving over 1100 clients across the continental US
• Farmer Friendly above almost all
  • We have to follow the Rule too!!
• Over 20 people on staff, many of who are active farmers or were raised farming
• We are your Team Players
HISTORY OF ORGANIC CERTIFICATION

Farmers wanted to grow food in line with certain core farming principles. They worked for many years without a standard but still had “certification.”

- ORGANIC FOODS PRODUCTION ACT OF 1990
  - AUTHORIZES THE USDA TO ADMINISTER THE NOP
- NATIONAL ORGANIC PROGRAM = NOP
  - FULLY IMPLEMENTED IN 2002
- NATIONAL ORGANIC REGULATIONS = THE RULE
- NATIONAL ORGANIC STANDARDS BOARD = NOSB
  - NOP’S ADVISORY BOARD
- NICS, AND ALL OTHER CERTIFYING AGENCIES, ARE ACCREDITED BY THE AMS AND WORK TOGETHER UNDER THE AUTHORITY AND REGULATIONS OF THE NOP.
TIMELINE TO ORGANIC CERTIFICATION

- Make the decision to go organic
- Establish your organic system plan (OSP) and begin maintaining records
- Transition your fields and practices
  - 36 months for crops ~ 12 months for dairy ruminants
- Contact a certification agency to get paperwork to fill out
- Submit paperwork and fees
- Get inspected and reviewed
- Certificate is issued!
TRANSITION TO ORGANIC CROPS

• No Prohibited Substances for 36 months
  – Follow the National List of Allowed and Prohibited Substances. Contact a certifier with questions.

• No to the Big 3
  – Sewage Sludge, Irradiation, GMOs
WHAT DO YOU MEAN DEVELOP AN ORGANIC SYSTEM PLAN?

• HIGH LEVEL VIEW

  – YOUR FARM IS A SYSTEM MADE UP OF SMALLER SYSTEMS

• YOUR ORGANIC SYSTEM PLAN IS THE FRAMEWORK YOU LAY OUT TO SHOW YOUR CERTIFIER HOW YOU ARE GOING TO COMPLY WITH THE REGULATIONS

• DON’T FORGET – THIS IS THE LAW WE ARE TALKING ABOUT!
5 PARTS TO THE ORGANIC SYSTEM PLAN

1. WHAT ARE YOUR PRACTICES AND PROCEDURES?
2. WHAT ARE YOU USING FOR INPUTS?
3. HOW AND WHEN DO YOU MONITOR?
4. HOW DO YOU KEEP THINGS SEPARATE?
5. WHAT IS YOUR RECORDKEEPING SYSTEM?

7 CFR 205.201 – ORGANIC PRODUCTION AND HANDLING SYSTEM PLAN
1. WHAT ARE YOUR PRACTICES?

- HOW DO YOU MANAGE SOIL FERTILITY AND STRUCTURE?
- HOW DO YOU MANAGE WEEDS, PESTS, AND DISEASE?
- WHAT WILL BE YOUR CROP ROTATION?
- HOW WILL YOU HARVEST WHAT YOU PLANT?
- HOW WILL YOU MANAGE YOUR STORAGE?
- HOW WILL YOU ADDRESS ANY ADJOINING NOG CROP GROUND?
2. MAKE SURE YOUR INPUTS AND MATERIALS ARE ALLOWED FOR USE!

- Inputs need to be declared as part of your OSP
- Using an input that is prohibited could jeopardize your certification
- The Organic Materials Review Institute (OMRI) is the gold standard for a material review organization (MRO)
- The Washington Department of Agriculture (WSDA) is also an MRO
- NICS reviews hundreds of inputs every year and has a database where we store the reviews and information

Call us – we may have already reviewed the product!
3. HOW AND WHEN DO YOU MONITOR?

- How do you monitor soil fertility?
- Do you take water tests?
- Do you perform Biodiversity Checks?
- How do you make sure no disease is creeping in?
- How do you ensure clean transport of your crop?
- Do you have a way you capture your compost making data?
- What kind of Pest Management monitoring do you do?
- These are the pieces of data you capture that show how you ensure that your system is working!!

*These can be the trickiest questions on the OSP forms because it can be difficult to capture certain practices in writing.*
4. HOW DO YOU KEEP THINGS SEPARATE?

- If you store both NOG and ORG inputs on-farm, what measures are in place to minimize risk of commingling?
- How do you prevent commingling in any equipment shared between NOG and ORG production?
- If you store both NOG and ORG crops, what measures are in place to minimize the risk of commingling?
- Do you inspect the truck when someone comes to take your grain?

**Organic Integrity must be maintained throughout the supply chain!**
5. WHAT IS YOUR RECORDKEEPING SYSTEM?

- Do you log your field activities?
- Do you use a calendar or do you do Page a Field?
- Are you using a computer? Smartphone?
- How can you tell – so that your inspector can tell – what you are doing, when, with what, where and how and what are the results?

Your practices make you organic, but your records keep you Certified Organic!
RECORDKEEPING

RECORDS MUST BE UNDERSTANDABLE AND AUDITABLE

SEED TO SALE RECORDS

INPUT RECEIPTS AND BLEND INFORMATION, AS APPLICABLE

PRODUCTION RECORDS

FIELD ACTIVITY RECORDS

SEED PURCHASE AND VERIFICATION

Sometimes you will need to dig into your tax records to get the necessary information, do that ahead of time!
RECORDS

WHAT ARE THEY GOOD FOR?!!?

NOTHING…

OH – NO WAIT – THEY ARE GOOD FOR SO MANY THINGS!

• COLLECTING DATA!!!
• LOOKING AT TRENDS
• FIGURING OUT WHAT IS WORKING AND WHAT IS NOT WORKING
• TRACKING EXPENSES
• TRACKING SALES
• MONITORING REPORTS
FIELD ACTIVITY RECORDS

THESE RECORDS ARE WHAT YOUR INSPECTOR COMMONLY USES TO DO A TRACEBACK THROUGH YOUR RECORDS SO THAT THEY CAN VERIFY YOUR ABILITY TO COMPLY WITH THE RECORDKEEPING STANDARD.

- **CALENDAR**
  - Pros – day to day, hangs on a wall, easy to track
  - Cons – hard to see trends and history, small boxes.

- **PAGE A FIELD**
  - Pros – all information about a field is in one place – crop rotation, fertility, pests, etc
  - Cons – more of a Binder system, more to manage

THESE RECORDS ARE WHAT YOUR INSPECTOR COMMONLY USES TO DO A TRACEBACK THROUGH YOUR RECORDS SO THAT THEY CAN VERIFY YOUR ABILITY TO COMPLY WITH THE RECORDKEEPING STANDARD.
FIELD ACTIVITY RECORDS

These records are what your inspector commonly uses to do a traceback through your records so that they can verify your ability to comply with the recordkeeping standard.

- ELECTRONIC RECORDS
- COG PRO - HTTPS://COG-PRO.COM/
- AGSQUARED - HTTPS://WWW.AGSQUARED.COM/
- TEND - HTTPS://WWW.TEND.AG/
- AGRIVI - HTTP://WWW.AGRIVI.COM/EN/FARM-MANAGEMENT
- VEGETABLES - HTTPS://VEGETABLES.ORG/
- FARM LOGS - HTTPS://FARMLOGS.COM/
- EXCEL SPREADSHEETS
- NOTES IN YOUR PHONE
- PHOTOS OF YOUR PLANTING

The thing that your certifier is most interested in, is making sure you have a system that is AUDITABLE. If you can’t find your information when the inspection time comes — which could be ANYTIME… Then there might be trouble…
SEEDS

- THE RULE SAYS, “USE ORGANIC SEEDS”
- DO YOU HAVE TO? YOU BET!!!
- BUT...THERE ARE EXCEPTIONS
  - COMMERCIAL AVAILABILITY
  - PRICE IS NOT AN EXCEPTION
  - DO AN ORGANIC SEED SEARCH
SEED RECORDS

DO I HAVE TO KEEP EVERY SINGLE TAG?

ASK YOUR CERTIFIER…

- Receipts
- Tags
- Treatment statements
- Untreated statements
- The Organic Seed Search
- Commercial availability
- Seed trial data
- NonGMO verification
INPUTS AND MATERIALS

THIS IS THE STUFF THAT CAN REALLY GET YOU IN TROUBLE...

WHAT SHOULD I HAVE ON HAND TO MAKE SURE I STAY OUT OF TROUBLE?

• YOUR APPROVED MATERIAL INPUT LIST
• OMRI CERTIFICATES
• LABELS
• COMPLETE INGREDIENT LISTS
• RECEIPTS
• RECORDS ON HOW THEY ARE USED – HOW MUCH, HOW OFTEN AND WHERE
THERE IS ALWAYS MORE TO SAY ABOUT INPUTS

- Do you have on-farm manure?
- Are you buying manure from an off-farm source?
- Do your seeds have a treatment? Is it OK for Organic?
- Corn starter fertilizer?
- Lime from the quarry down the road?
- Foliar sprays?
- Micronutrient fertilizers?

Call and find out if something is allowed!!
CONSIDER DEVELOPING SOPS
STANDARD OPERATING PROCEDURE

• A well developed and documented SOP can help the efficiency of an operation immensely – especially when it comes to paperwork.
• IF you would like to replace some records with SOPs, work with your certifier to make sure all aspects of recordkeeping are covered.
• Examples of SOPs:
  • - bed preparation #1, fertilizer mix #32, field prep for small grains
  • - fresh cow SOP, calf scour SOP, mastitis SOP, hoof care SOP

Consider Making your SOPs detailed enough so that when an issue arises with your Grandpa in Orlando, you could have your best hand on farm for 2 weeks and they could do the work and ensure documentation is maintained in a simple way!
READY TO SUBMIT THE PAPERWORK!

WHAT HAPPENS NEXT?
COMPLETE THE APPLICATION AND SUBMIT

• Submit application along with supporting documents to your certifier
  – Be sure to:
    • Get a nice map and make sure all of your fields are visible and identified and acreage is accounted for and matches your field plan
      – FSA Office
      – Google Earth
    • Make copies for your records
    • Submit applicable fees associated with your certification request

• Let your certifier know when you will have your first harvest
INITIAL REVIEW AND INSPECTION

• The Certifier reviews the paperwork to determine if you have the ability to comply with the Rules

• An Initial Review Letter goes out, informing you of any concerns or questions that your certifier may have

• The Initial Review also prepares you for Inspection

• The Inspector schedules the visit and comes to the farm

• The fields and facilities are visited, the records are reviewed, and the Organic System Plan is verified.

• Any concerns are noted in an Exit Interview so the producer is aware.
THE INSPECTION REPORT AND THE FINAL DECISION

• THE INSPECTOR VERIFIES, RECORDS, AND REPORTS. ONLY.

• THE INSPECTOR IS NOT THERE TO GIVE ADVICE OR CONSULT BUT MAY PROVIDE TECHNICAL ASSISTANCE

• AFTER THE REPORT IS SUBMITTED, THE CERTIFIER PERFORMS THE FINAL REVIEW

• IF THERE ARE MISSING DOCUMENTS OR PIECES TO THE PLAN THAT ARE UNCLEAR, THE CERTIFIER REQUESTS MORE INFORMATION
  • SOME AGENCIES WILL GIVE YOU A CALL
  • SOME AGENCIES WILL SEND YOU A LETTER

• WHEN THE FINAL DECISION IS COMPLETE AND COMPLIANCE IS VERIFIED, THE CERTIFICATION AGENCY ISSUES A CERTIFICATE
  • ADDITIONAL COMMUNICATION ABOUT AREAS OF IMPROVEMENT MAY ALSO BE ISSUED

• THEN YOU ARE CERTIFIED
CERTIFICATION PITFALLS TO AVOID

• NOT CALLING AND ASKING ABOUT A PRODUCT AND USING IT WITHOUT APPROVAL

• NOT PURCHASING ORGANIC SEED WHEN IT IS COMMERCIALY AVAILABLE

• NOT HAVING ALL RECORDS READY OR EASILY ACCESSIBLE DURING THE INSPECTION TO VERIFY YOUR COMPLIANCE

• NOT DOCUMENTING CHANGES TO YOUR ORGANIC SYSTEM PLAN, OR FOR MAJOR CHANGES (MOVING TO A NEW FACILITY), NOT IMMEDIATELY CONTACTING THE CERTIFIER.

• NOT CONTACTING THE CERTIFIER IMMEDIATELY IF YOU HAVE BEEN ACCIDENTALLY SPRAYED
OH HAPPY DAY
WHEN THE CERTIFICATE COMES IN THE MAIL...