



GUIDEBOOK

FOR

ORGANIC

CERTIFICATION

Second Edition

Answers to Common
Certification Questions

PRODUCED BY

mōses

MIDWEST ORGANIC AND
SUSTAINABLE EDUCATION SERVICE

FUNDED IN PART BY



Written by
Jody Padgham
and Harriet Behar

Designed by
Jody Padgham

This publication is available online at
www.mosesorganic.org

Second Edition June 2007

Funding made possible from
a USDA Agricultural and Entrepreneurship
Education Extension Grant

2007 Web Version
This booklet was designed for a half page format.
It has been modified here to be more easily
printed front to back



Guidebook for Organic Certification

Published by the
Midwest Organic and
Sustainable Education Service - MOSES
PO Box 339
Spring Valley, WI 54767
715-772-3153
www.mosesorganic.org

With funding support from the
University of Wisconsin-Extension
Emerging Agricultural Markets Team



Table of Contents

Page

2	Understanding Organic Certification
4	The Certification Process
9	General Production Questions
10	Approved Materials
11	Livestock Production
14	Crop Production
16	Processing and Handling
18	Marketing
20	Steps to Organic Certification
22	Appendix A: Resources
23	Appendix B: Dairy Animal Aquisition
24	Index
25	About MOSES



The organic marketplace is dynamic and growing. Opportunities are strong for those considering transitioning to or starting up in organic production. In order to sell or process an organic product very specific production and handling processes must be followed.

This Guidebook has been developed to answer basic questions frequently asked about organic certification. This booklet outlines how to go about the process of becoming certified for organic production, and offers suggestions on where to go for more help.

To learn more about where to go for specific questions on organic production refer to the "resources" section.

Understanding Organic Certification

1. What are the benefits of organic certification?

There are numerous benefits of organic certification. They include:

- The potential of receiving a premium price for your product.
- Strong growth in market demand for organic products.
- Research studies show added health benefits of organic food.
- Improved soil and water quality through enhanced management and reduction of synthetic chemicals.
- Reduced handling of potentially hazardous and expensive agricultural chemicals.
- Increased profits due to reduced off-farm inputs.
- Yearly documentation of production activities provides a historical reference and contributes to the development of effective farm plans.

2. Why do I need to get certified to sell organic products?

Congress passed the Organic Foods Production Act (OFPA) in 1990. The OFPA required the U.S. Department of Agriculture (USDA) to develop national standards for organically produced agricultural products to assure consumers that agricultural products marketed as organic meet consistent, uniform standards. The OFPA and the National Organic Program (NOP) regulations, (named the National Organic Standards or NOS), require that agricultural products labeled as organic originate from farms or handling operations certified by a State or private entity that has been accredited by USDA. You are not allowed to use the word "organic" in reference to your agricultural product unless you comply with the National Organic Program or fall under an exemption.

3. I've heard organic farms don't get good yields. Is this true?

- Yields can be reduced during the transition years, as the farmer changes to organic management. Soil fertility and weed control are a challenge these first years of organic farming. Improved soil biological life and soil tilth, the cornerstones of successful organic farming, take time to accomplish. Depending on the quality of the soil transitioned to organic, the effectiveness of the equipment used and the skill of the farmer, there may not be any reduction in yield, or there may be some reduction. Long-term trials at IA State University and the University of Wisconsin organic experimental plots have shown no lessening of yields compared to average conventional yields after production has been under 4-5 years of organic management.

- Many organic dairy producers will have reduced rolling herd averages, but find their prized cows live longer and thus have many more lactations per animal. There also may be fewer inputs and visits from the vet. This results in more value and income per cow than most conventional operations see.

4. Can I make any money as an organic farmer?

Organic farmers tend to not purchase many inputs, although there is more labor needed for weed control, paperwork, and soil improvement. Most organic crops and animal products receive a significant premium in the marketplace, returning dollars to the farmer for this increased labor cost. As with any business enterprise, planning should be done to assess the cost of production in relation to the expected price received for all organic products produced.

5. What kinds of products does the National Organic Program cover?

- "All production or handling operations (or parts of such) that produces or handles crops, livestock, livestock products or other agricultural products that are intended to be sold, labeled or represented as "organic" must meet all requirements of the NOP (unless exempt)." (§205.100(a)). The NOP was set up to govern agricultural products. Things that are not agriculturally produced (such as mined products- for example salt or lime) are not covered by the organic law. They may be labeled as "approved for organic production."

- Operations that sell less than \$5000 per year of organically labeled products, do not need to be certified annually, but still need to follow all aspects of the regulation, including the recordkeeping.

- Specialty crops such as mushrooms, sprouts, greenhouse production, maple syrup, pet foods and personal care products must meet all of the regulations and may have additional guidelines suggested by individual certification agencies.
- Retail stores and restaurants, while excluded from the requirement of certification to handle and sell organic products, may voluntarily choose to be certified.

6. How do I know if a product in the store is organic?

Any product using the word organic on the label must state the name of the certification agency that certified that product. You can find this next to the name and contact info of the manufacturer of the product, usually on the back label. If a product contains 95% or more organic product, then it may also use the USDA organic seal.



7. What are the penalties for misusing the term "organic"?

Any operation that knowingly sells or labels a product as "organic" that is not in accordance with the Organic Foods Production Act and the National Standards may be subject to a civil penalty of up to \$10,000 per violation. In addition, if an operation has been found to commit fraud under the organic label, they may lose their right to sell organic products for up to five years.

8. Who enforces the National Organic Program?

The first enforcement of the USDA organic regulations is through the organic certification agencies, who can suspend or revoke organic certification of those who are not following the organic regulations. The next step would be to file a complaint with the the USDA National Organic Program. For information on how to file a complaint, go to <http://www.ams.usda.gov/nop/Compliance/FileComplaint.html>.

Mail all complaints to the following address: NOP Compliance, Agricultural Marketing Service, United States Department of Agriculture, 1400 Independence Avenue, S.W., Mail Stop 0203 - Room 302-Annex, Washington, D.C. 20250 . Email: NOPcompliance@usda.gov

9. Will the organic laws change? How will I know if they change?

- The Organic Foods Production Act (OFPA) is the law -outlining organic production passed in 1990 and can only be amended by Congress. There have been changes made by Congress to the OFPA since its original passage. The regulations implementing this law have been amended since 2002 in order to clarify the standard and to keep it true to the intent and letter of the OFPA. Whenever the regulation is to be amended, it must go through a public comment process. All notifications of these proposed and final changes as well as public comment periods are on the NOP website, <http://www.ams.usda.gov/nop>. This includes materials to be added or removed from the National List of approved or nonapproved substances.

- The National Organic Standards Board (NOSB) is a 15-member board authorized by the OFPA. Members are appointed by the Secretary of Agriculture for 5-year terms, and consist of farmers, processors, retailers, environmentalists, scientists, consumers and representatives of certification agencies. They assist the Secretary in developing proposed standards and approval for substances to be used in organic production and handling (processing) The NOSB also advises the Secretary on other aspects of implementing the National Organic Program. The NOSB has made recommendations on interpretations and changes to the NOP. All official changes to the regulations must go through the public comment period and are not regulation until published in their final form in the Federal Register.

- The OFPA gives specific authorization to the NOSB to approve or deny all materials present on the National List of approved or nonapproved substances to be used in organic production. The NOP cannot put any item on the National List without review and approval by the NOSB. However, the NOP can decide not to put an NOSB approved item on the National List, especially if they can illustrate that it may contradict another US regulation, such as a livestock health product that is not currently approved by the FDA for livestock use. NOSB approved materials cannot be used until they have been published in the Federal Register by the NOP as a final regulation, nor removed from the

National List until published as well.

- Transcripts of the NOSB meetings are available on the NOP website along with background information on all NOSB recommendations and any information used when considering materials for the National List.

- The NOP will notify accredited certification agencies of changes and pending changes to regulations, policies, and procedures and post such changes and pending changes to its website. Certifying agents should, in turn, notify their clients of such changes and pending changes. As described above, amendments to the NOP regulations require rulemaking with an opportunity for public comment. The NOP issues news releases on Federal Register publications and posts such news releases and Federal Register documents on its website. Published by the Office of the Federal Register, a part of the National Archives and Records Administration (NARA), the Federal Register is the official daily publication for rules, proposed rules, and notices of Federal agencies and organizations, as well as executive orders and other presidential documents. It can be found at <http://www.gpoaccess.gov/fr/>.

10. Can non-certified farmers use the word "organic"?

The only non-certified farmers that are allowed to use the term "organic" are those whose gross agricultural income from organic products is \$5,000 or less annually. These farmers must still comply with all of the requirements of the NOP, including record keeping, but are exempt from going through the certification process. Products from exempt operations may not be used as organic ingredients in organically certified processed products produced by another operation or used as certified organic feed for livestock.

The Certification Process

11. How long does it take to get certified as organic?

- In order to sell a certified organic crop, the land on which it was grown must be free of prohibited substances for 36 months prior to the **harvest** of the first organic crop. Having documentation detailing the actual day, or at least the month, of last prohibited material application is necessary. If the only information details a prohibited material was applied in the spring, then the date chosen will be June 21, the last day of spring. No GMO or seeds treated with prohibited synthetic materials can be used during the transition time to organic production.

- A farmer has their first organic inspection during the growing season when they plan to sell the organic crop. He/she could choose to be inspected during the transition year, but this is not necessary. The certification application should be submitted no later than 3 months prior to the date when the first organic harvest is anticipated. Many certification agencies encourage applications in March or April and charge a late fee for applications received after that time. There will be a place on the application where the farmer can clarify when he needs his organic certification to be completed in order to sell the organic crop. The organic inspection must take place during the growing season of the crop to be certified.

- Livestock have slightly different requirements. Poultry must be managed organically from the second day of life, therefore day old chicks from any source may be purchased and then subsequently fed and managed organically. Animals for meat such as hogs, lambs, beef, etc. must be managed organically from the last third of gestation within their mothers. For example, if a first time organic beef farmer has calves in the spring and wishes to feed his own hay and feed to the mothers who will give birth to organic calves, he should get his cropland certified the year before the first organic calves are to be born, so the brood cows will be eating certified organic feed during the last third of gestation. Organic feed can also be purchased, if this certification the year before is not possible. Organic certification agencies cannot retroactively certify crops from a previous year, the fields must be inspected when the crops are growing. These brood cows can never be sold as organic meat themselves, but they may birth organic animals. Once the brood cows have birthed an organic calf, then they must remain under full organic management and cannot be managed conventionally for part of the year and then organic for the rest of the year. If they had birthed an organic calf and then

were managed conventionally either by feeding nonorganic feed or given a prohibited health product, they can no longer give birth to organic calves. Rules for transitioning to organic dairy are in question 41.

12. How much does it cost to be certified organic?

Each certification agency has its own cost structure, but generally there is an annual certification fee, a charge for the inspection and possibly user fees (a percent of annual organic gross sales.) For most operations, it will cost between \$400-\$1,000 per year to maintain organic certification.

13. Are there grants to help with organic certification costs?

- Money has been available on a year by year and state by state basis from the USDA and administered by the various State Department of Agricultures. In Wisconsin, contact Laura Paine at the WI Department of Agriculture. (608-224-5120 or laura.paine@datcp.state.wi.us). In MN contact Meg Moynihan at the MN Department of Agriculture (651-201-6616 or meg.moynihan@state.mn.us), in Iowa contact Maury Wills at the Iowa Department of Agriculture (515-281-7656 or maury.wills@ids.state.ia.us)

- The Natural Resources Conservation Service- Environmental Quality Incentive Program (NRCS-EQIP) has also been used to help cover the costs of a transition to organic production. For more information, contact your county NRCS office.

- Some organic commodity buyers offer monetary stipends to farmers to aid them during their transition to organic. Contact various buyers in the MOSES organic resource directory for their specific programs.

14. What are the ongoing costs?

Organic certification is an annual process, with annual inspection and annual fees. User fees (use of the organic certification agency name) based on annual organic sales can be paid quarterly, yearly or by each organic sale, depending on the situation and certification agency policy.

15. What do I do first to become certified?

- Organic production is different from conventional production. With an emphasis on preventative problem solving, there may be a lot to learn before one can successfully produce organic crops, livestock or processed products. To succeed in organic production you will first need to learn how to produce your particular product using only approved practices. We recommend that you read, attend workshops and field days and visit organic operations producing the types of things you would like to produce to learn techniques and practices for organic production. All successful farming is based in routine. A change to organic farming may bring some production practices that are unfamiliar, but after time, they will become part of your regular routine.

- The Midwest Organic and Sustainable Education Service (MOSES) offers a website (www.mosesorganic.org) with an events calendar, has written resources (free fact sheets and books for sale) and hosts events (field days, Organic University and Upper Midwest Organic Farming Conference) that will help your organic education. MOSES also offers a newspaper, the Organic Broadcaster, with articles to help you understand the intricacies of successful organic production.

- You should read the "National Organic Program: Final Rule" (also known as "National Organic Standards") available online at <http://www.ams.usda.gov/nop/NOP/standards.html>. This is the regulation that outlines the requirements for organic production, processing, labeling and certification. MOSES offers fact sheets titled "Transitioning to Organic Crop (Dairy, Beef, Sheep, etc.) Production," that can help translate the NOP rule for you.

- When you have managed your cropland organically for three years, you should be eligible for certification. During transition, the production practices you learn and the decisions you make will help you to develop your organic farm plan, which is a part of the organic certification application.

- Contact a certification agency during the transition time. Don't wait until your land qualifies for organic certification. The certifying agent can answer your questions about what materials are approved before you use them. They can also send you information to get you started.

- Before you make any major changes on your farm or processing facility do some research to

identify potential markets for your organically produced products. Organic markets will very likely be different from the ones you are currently utilizing, and may have geographic, varietal or timing issues that can direct your production decisions.

16. When do I submit my certification application?

Call the certification agency you wish to work with to get its recommendation of a timeline for your particular product or industry. The certification process may take at least 3 months. You will want to submit your application at least 3 to 5 months before you wish to sell organic products. You want to get an application packet long before this so that you have some time to fill it out and think about your organic farm plan. An inspection needs to be scheduled as part of the process. Inspection costs will vary depending on how many inspections the inspector has in your geographic area, since expenses are charged to each producer. If costs can be shared among many producers in one area, this lowers the cost to each. If you are a producer it is best to get your application in as early as possible in the growing season.

17. Where do I go for help with filling out forms?

- Your certification agency can help you understand how to fill out your certification application. Try to complete the form as much as possible on your own and do not leave any areas blank. If there are areas that are not applicable, then check the "not applicable" box. The certification agency will not process an incomplete application and they may send it back to you. MOSES has a toll-free organic info line, where you can call and ask specific questions when filling out your paperwork at 888-552-4769.

- ATTRA (The National Sustainable Agriculture Information Service) has some very handy workbooks (NCAT's Organic Crops Workbook and NCAT's Organic Livestock Workbook) that will take you step by step through understanding organic production and developing your organic farm and/or livestock plan. You can find them online from the ATTRA website at www.attra.ncat.org or request them by calling 800-346-9140.

18. Where do I go for help with understanding organic certification?

- Your certification agency is your best resource for specific certification questions.
- The National Organic Program- a part of the USDA- has a comprehensive website at <http://www.ams.usda.gov/nop/indexIE.htm>. Here you will find the full text of the National Organic Program Final Rule, as well as any updates/interpretations and changes. The Q&A section is a good resource.
- ATTRA (<http://attra.ncat.org/organic.html#overview>) and MOSES (<http://www.mosesorganic.org/factsheets/intro.htm>) also offer other resources on understanding the certification process.
- MOSES offers several fact sheets that help translate the NOP regulations for specific crops and livestock. You can find the fact sheets at <http://www.mosesorganic.org/factsheets/index.htm>. MOSES also has a toll-free organic info line, where you can call and ask specific questions when filling out your paperwork at 888-552-4769.

19. How do I find a certification agency?

- MOSES offers a fact sheet titled "How to Choose a Certification Agency" that will help you through this process. You can download a copy at <http://www.mosesorganic.org/factsheets/howtochoose.html>
- The National Organic Program website lists all certification agencies that have been accredited by the USDA to certify farms and processors in the U.S. Visit <http://www.ams.usda.gov/nop/CertifyingAgents/Accredited.html>.
- The MOSES Upper Midwest Organic Resource Directory lists certification agencies active in the Midwest. <http://www.mosesorganic.org/umord/index.htm>
- The New Farm website has an online review of certification agencies. New Farm offers information about fees, types of services and regions serviced by each agency. You may visit the certifier guide at <http://www.newfarm.org/ocdbt/>.

20. Why are there so many certification agencies to choose from, and how are they different?
Before the National Organic Program came into being organic certification in the U.S. was handled by about 40 non-profit business and state run institutions. The USDA recognized the diversity of this expertise and set up the certification system so that various groups are accredited by the USDA to certify organic farms, wild crops, livestock and processing. Each of these agencies are certifying to the same National Organic Standard; but are individual in the fee structure and services they offer. Some have particular geographic areas they concentrate in (including international); others specialize in particular types of operations. You want to explore those who are active in your area so that you can choose the agency that best meets your needs. Be sure the certifying agent you choose is accredited in the area that you need certification, such as crops, wild crops, livestock and/or processing.

21. Do I have to get certified each year?

You must submit an organic plan update to your certification agency and get an inspection each year. You will also pay annual fees.

22. How long does my certification last?

Your certification lasts until you either choose to not reapply (surrender), are suspended or revoked for noncompliance. You must be inspected during each crop year and pay your fees for each year in order to continue your organic certification in good standing.

23. Can I change certification agents?

Yes. You may apply for certification through any USDA approved certification agent you choose, and may change from year to year if you desire. Certification determination information from the prior agency must be provided to the agency with whom you are newly applying.

24. How long does a certification inspection take?

This varies a lot by the type of operation you have, but will on average take 3-5 hours. A first time inspection usually takes more time than subsequent inspections.

25. Who decides if I am certified or not?

- Your organic plan is first reviewed with the agency to see if there are any obvious major noncompliances that would rule out certification. If this should be the case, you are informed and given the option of withdrawing your request so as not to incur further costs.
- Staff at a certification agency will help you prepare for the inspection and certification process. An inspector checks to see that you are indeed doing what you have reported on your farm or processing plan. The inspector verifies and reports that your submitted plan reflects what they see on your farm. The inspector will submit a report to the certification agency and certification staff members will closely go over your entire file and determine if you are in compliance with the National Organic Program, identifying any areas of minor noncompliance (which would not stop the certification process) and corrections needed, and will issue an organic certificate (or not).

26. What can I do if I am denied certification and disagree with the decision?

Each year your certification agency will issue you a letter detailing your compliance to the organic regulation. There may be requirements that need to be corrected by the following year, or more serious requirements that must be met within a shorter timeline in order to receive organic certification for that crop year. Not complying with previous year's requirements may be a cause for the certifier to deny certification in the subsequent year, depending on the seriousness of the requirement. There may also be very serious noncompliances that may not be able to be corrected in a specific crop year, such as use of a prohibited substance on organic land, and you may receive a denial of certification on a specific field or the whole farm. If you receive a denial, or do not meet the requirements that need to be met in the shorter timeline, or did not meet the previous year's requirements, then you may also be denied organic certification. You may then either ask for mediation with your organic certification agency to solve these issues or you may appeal this decision

to the National Organic Program by downloading the procedures and forms needed from the NOP website, (click on the "enforcement and compliance" heading and then go to "appeals"). There are short timelines for getting your appeal to the NOP. You must read all of the documentation carefully to make sure that you are following their protocols, since if you do not, your appeal will not be considered valid.

27. How can I figure out what kinds of records I need to keep for organic certification?

- Records for organic certification need to be sufficiently detailed to illustrate your compliance to the organic regulation. This includes all seeds planted (including cover crops), all tillage, cultivation and harvest activities as well as running inventories of stored crops and sales. All bulk sales **MUST** be accompanied by a lot number on the invoice or other transfer documents, (see the MOSES Fact Sheet on Understanding Lot Numbers). If you sell commodity crops in bulk, it is important that your storage records track which field's crop are in each bin (or mingled in a bin) as well as how many bushels were sold at each sale and to whom. If you feed your crops to organic livestock, you should still track which fields are mingled in each bin, and keep a periodic running inventory every two months or so, detailing how much crop has been used. It is understood that many of the incoming bushels will be rough estimates, but the outgoing sales should be exact figures. Your certification agency or ATTRA has forms to help you document field activities, seed and inputs used, storage and sales records. If you have both organic and conventional crops, or if you harvest crops from the nonorganic buffer areas, these nonorganic crops must also be documented, with all records available for review by the organic inspector during their annual inspection.
- Livestock records should be sufficient to track the health events of each individual, with each animal having a clear identity, such as an ear tag, tattoo, or even a photograph if the animals are easily distinguished as individuals, such as Holstein cows. Items such as birth, vaccinations, castration, weaning, grouping with other animals, and use of any health inputs including all organically approved items such as aspirin, should be documented and tracked to each animal. Again, your certifier or ATTRA have blank forms to help you with this task.
- While organic recordkeeping may seem daunting, once you start your recordkeeping and make a habit of writing things down it is not so difficult. While these records are necessary to document your compliance to the organic regulations, they are also invaluable to you as a management tool, giving you historical references of what activity has worked well and which ones have taught you lessons. Records also help you with decisions about culling or breeding animals based on production information you have gathered over the years.
- Small pocket notebooks or barn calendars can be used to track items, but many farmers transfer these notes to more permanent spiral notebooks or three ring binders. Remember, all records pertaining to your organic certification (seed tags, pocket notebooks, calendars, sales receipts etc.), must be kept for five years.

28. If I buy certified organic land, does that mean I can grow certified organic crops?

Certification covers a particular individual as manager of a particular piece of property. Certification does not transfer with a property sale. However, you can apply for certification for the newly purchased organic land in your own name and will not have to go through the 3-year transition as long as no prohibited practices or materials were used since certification was last renewed. Obtain a copy of the previous landowner's organic certificate, if possible, to include with your certification application.

29. Can land I rent from my neighbor be included with my certification?

Yes. If you sign a rental agreement to use your neighbor's land, and follow all of the requirements (including 3 year transition with no prohibited materials applied), rented land can be certified under your certification. You must include the rental property in your organic farm plan, on field maps and in recordkeeping.

30. Must I get my water tested in order to be certified organic?

A water test is not specifically required by the NOP. However, §205.203(c) of the rule specifically

states that "the producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil or water by plant nutrients, pathogenic organisms, heavy metals or residues of prohibited substances." To monitor this, the farmer may conduct regular water testing, in which case, the certifier may request copies of the water test results. In addition, if you are washing crops and selling them for human consumption, it would be a good idea to verify this water is potable.

31. If I file an Organic Farm Plan or Organic Processor Handling Plan and then decide to make changes, what do I need to do?

- Your organic farm or handling plan outlines all the things you are doing or intend to do to comply with the NOS. If you deviate from it significantly, you must notify your certification agency and get their approval that what you are now doing also complies with the law. If you are changing any products used or inputs into an organic product, you should contact your certifier immediately to check for acceptability.
- Many times there may be changes to the crops grown or inputs used between submission of the application and actual planting of the crops. These changes should be written on an updated field history form and submitted at your inspection. Processors must submit all labels and product recipes to the certification agency for approval before they are sold in the marketplace.

32. I have heard the term "IFOAM accreditation". What does this mean?

IFOAM is the International Federation of Organic Agriculture Movements, a non-governmental organization promoting organic agriculture around the world. IFOAM's Organic Guarantee System is designed to facilitate the development of quality organic standards and third-party certification worldwide, and to provide an international guarantee of these standards and certification. Due to the growing international marketplace, certification agencies worldwide are choosing to unite by conforming to IFOAM's international standards. IFOAM accreditation may be offered by your certification agent. It will assist in your ability to market organic products into the European Union. Talk to your buyer to see if they require IFOAM certification. If your product is sold and consumed in the United States, then you will not need more than NOP certification.

33. Are there other kinds of certification associated with organic production?

There are several international certifications for those looking to market overseas. These include Japanese Agriculture Standard (JAS: Japan), EU (for the European Union), Biosuisse (Swiss). Farmers that are selling commodity organic products such as corn, soybeans or seeds may want to consider certification to one or more of these standards to increase market potential. JAS is especially attractive as it is needed to sell into the Japanese market for soybeans. Each of these certifications requires a separate examination of standards by your certifier, but may be offered by the same certifying agency you go to for NOP certification. If you desire overseas certification, be sure to ask about its availability as you are deciding which certifying agency to work with. If you plan to sell an organically labeled product into Canada or specifically Quebec, talk with your certification agency concerning their specific requirements (dual English/French labels etc.).

General Production Questions

34. Where do I go for help with understanding organic production?

- MOSES offers the annual Upper Midwest Organic Farming Conference, held the last weekend in February in La Crosse, WI. The Conference includes numerous workshops on organic production and marketing, a large organic trade show and networking opportunities. The Organic University is the day before the Conference, and offers full day intensive trainings on organic production and marketing issues. MOSES also produces the Upper Midwest Organic Resource Directory, which lists support organizations, certification agencies, buyers, marketing agencies and more. It is available online at <http://www.mosesorganic.org/directory.htm> or in hard copy by calling the MOSES office at 715-772-3153. MOSES also offers a booklist of books relevant to organic production, available at <http://www.mosesorganic.org/booklist.htm>.

mosesorganic.org/mosesgeneral/booklist.htm or by calling the MOSES office. Specific questions can be asked during business hours M-F, on the MOSES organic info line tollfree 888-551-4769 (GROW). MOSES also attends numerous field days and conferences, check the MOSES event calendar on our website www.mosesorganic.org

- ATTRA- The National Sustainable Agriculture Information Service has numerous publications helpful to organic producers. You may browse their catalogue at <http://attra.ncat.org/organic.html#list> or receive their list of organic production publications by calling 800-346-9140.
- The Rodale Institute hosts a website dedicated to organic production and marketing, called The New Farm. Here you can find weekly updates on organic prices around the country, a Certifier Directory that can help you compare services offered by certification agencies and lots of farm profiles and production information. Available at www.newfarm.org
- Other organizations offering support for production information may be found by using the MOSES Upper Midwest Organic Resource Directory (UMORD), available at <http://www.mosesorganic.org/umord/directory.htm> or by calling the MOSES office.
- Talk to and visit other organic farmers or processors. Watch for field days to attend. If you have a prospective buyer for your organic product, ask if they offer educational resources.

Approved Materials

35. How do I find out what fertilizers, pest control inputs or other products I can use on my organic farm?

The NOP Final Rule, Subpart G includes the "National List of Allowed and Prohibited Substances." This list has several sections, describing generic synthetic substances allowed for use in organic crop and livestock production and processing as well as lists of non-synthetic substances prohibited for use in organic crop or livestock production or processing. Basically, for crop and livestock materials natural substances (non-synthetic) are ALLOWED unless they are specifically prohibited on the list, and synthetic substances are NOT ALLOWED unless they are specifically approved on the list. It is important to note that there are some things that are allowed for livestock production, for instance, but not allowed in crop production. Be sure when using the National Lists that you look at the correct listing for your planned use.

36. As a processor of organic products, do I use the same lists?

Processors have different lists of allowed and non-allowed products. Section §205.605 is a list of nonagricultural substances allowed as ingredients in "organic" or "made with" organic products. §205.606 is a list of non-organically produced agricultural products allowed as ingredients. The difference is not necessary synthetic or non-synthetic, but agricultural vs. nonagricultural and organic vs. nonorganic. Always check with your certification agency before adding a new ingredient or product to your organic plan.

37. Can the lists change?

The National Organic Standards Board (NOSB), mentioned in Question 9, makes recommendations to the Secretary of Agriculture on substances that should be added to or removed from the National List. The USDA publishes amendments to the National List in the Federal Register, after which the substances may be used in organic production or handling. Any amendments can be found on the NOP website at <http://www.ams.usda.gov/nop/NationalList/ListHome.html>. Your certification agency will keep you informed by mail or in their newsletters of new items added, or of previously allowed items removed from the National List.

38. Is there other help in understanding what products are allowed?

A non-profit organization, the Organic Materials Review Institute (OMRI) offers assistance in interpreting the compliance of hundreds of products for use in organic production. OMRI works with many certifiers and aids them in determining if specific brand name products are allowed or not. OMRI has a "Product Listing" on their website www.omri.org, which lists brand name products whose

proprietary information has been reviewed and verified as acceptable for use in organic production. Some certification agencies include OMRI materials and updates as part of their service. Since many of these products may not list all inerts or other fillers, it is important to verify if multi-ingredient products are acceptable before use. Always check with your certification agency before adding a new input to your organic plan.

39. What are the rules for using things like salt or lime on my organic farm?

Natural minerals such as salt or mined lime may be used, but you must be careful that nothing has been added. Sometimes ingredients such as an anti-caking agent have been added that are non allowed synthetics. In the case of lime, it must be mined lime, and not recycled wallboard, slaked or burned lime or paper mill sludge. Check your labels and sources carefully. Your certification agency will require you to provide ingredients information for all feed, minerals, supplements, fertilizers and inoculants that you have used on your farm or processing plant to ensure that you have used approved products. If you have questions, contact your certification agency.

40. What are the rules about using treated lumber on an organic farm?

The use of lumber treated with nonapproved synthetic substances is prohibited for new installations or replacement purposes where it may have contact with soil that is growing an organic crop (including grass in pastures) or in contact with livestock (such as corrals or fenceposts that the animals may rub up against). This prohibition includes the new formula treated wood which has replaced the copper arsenate or creosote treated lumber. Large-dimensional treated lumber used to build, for example, a graveled loafing shed, can have untreated plywood placed over the treated wood up to six feet to prevent contact with livestock. An electric fence line, keeping the animals from eating around the base of treated wood posts, may also be used. Check with your certifier for their specific guidance on this issue.

Livestock Production

41. I am a dairy farmer interested in organic production. What are the rules for starting an organic dairy herd?

- Dairy cows must be managed organically for one year prior to the production and sale of organic milk. Organic management includes feed, health care, living conditions, access to pasture when seasonally appropriate and recordkeeping.
- In October 2005, Congress amended the OFPA to allow dairy farmers to use, in addition to certified organic feed, their own feed that was grown on land between 24 months and 36 months past the use of prohibited substances, or in its third year of transition. This feed cannot be purchased from off the farm, but must be raised on the operation requesting organic certification.
- All dairy animals must be managed organically regarding health care, recordkeeping and living conditions for the entire transitional year. Once the farm has started their transition to organic for the milking dairy cows, all young stock or dry cows must also be managed organically.
- Once the farmer begins to sell organic milk after 12 months of either transitional or organic feed, only certified organic feeds are to be fed to all current or future organic production animals.
- Since 2002, the regulations that deal with replacement dairy animals have been clarified and changed, so the introduction of new dairy animals into an existing organic dairy herd depends on the method the farmer used to originally obtain organic certification. See the NOP Dairy Animal Acquisition table in Appendix B for specific details.
- Livestock that have been removed from organic management are no longer eligible to transition to organic production. An example of non allowed practices are calves being born to an organic mother, but raised nonorganically for 8 months and then transitioned back to organic for one year before freshening.
- Bulls do not need to be managed organically.
- In order for dairy animals (cows, sheep, goats) to be sold as organic meat, they must meet the same requirements as all organic slaughter animals. This means that they must be managed organically from the last third of their gestation, born from an organic mother.

42. Is it true that I can't use antibiotics on my animals?

Yes. Antibiotic use is not allowed as part of organic management. No animal that has been treated with any antibiotic at any time in its life can be an organic slaughter animal. No antibiotics can be used on milk animals during transition or in the entire dairy herd (including replacements) after certification except as noted in Question 43 below. If you used antibiotics before you began your organic transition, these animals may be transitioned to organic. However, any animal that is past transition and is treated with antibiotics for any reason must be put into conventional production or shipped.

43. What happens if my cow gets really sick?

Organic livestock systems focus on preventative care to avoid situations where antibiotics are needed. However, it is mandatory that an animal not be neglected or untreated to preserve organic status. If antibiotics or other prohibited medicines are needed to save an animal's life, they must be given and the animal taken out of organic production.

44. Can I vaccinate my animals?

Yes. As long as the vaccination is veterinarian recommended in your geographical area and does not contain ingredients prohibited by the NOS or the National List. Currently, there are no GMO vaccines allowed. Verify with your certification agency that the vaccines you are using or plan to use are approved.

45. What kinds of minerals, supplements, feed inoculants and health care products can I use on organic animals?

- All minerals are allowed, as long as they do not contain non-approved additives and are not listed on the National List. A few minerals (such as arsenic and strychnine) are listed on the National List and are not allowed in organic production.
- Health supplements and medical treatments must be reviewed for ingredient compliance with the National Lists. Alcohol, iodine, aspirin, electrolytes, glucose and hydrogen peroxide are examples of allowed inputs. Those who produce supplements for organic livestock may state they are "approved for organic production" but you should always check with your certification agency before using an unfamiliar product.
- Agricultural products present in health products can be natural without synthetic additives (such as aloe vera without a preservative), but any product fed routinely as a feed must contain only certified organic agricultural ingredients. This would include organic soy oil used as a feed dust suppressant, for example.
- All agricultural substances in regularly fed supplements or feed inoculants must be certified organic. There must be no prohibited ingredients or genetically modified organisms in inoculants or supplements.

46. I have heard that I must put my dairy animals out on pasture. What is the definition of pasture?

- The NOS says that: (§205.239(a)(2)) "The producer of an organic livestock operation must establish and maintain livestock living conditions which accommodate the health and natural behavior of animals including:.....Access to pasture for ruminants."
- In the definitions section (§205.2) of the NOS pasture is defined as "Land used for livestock grazing that is managed to provide feed value and maintain or improve soil, water and vegetative resources." This portion of the law is currently under debate, as it does not specifically give a stocking rate or exact details of feed expectations of pasture.
- Pasture quality and availability is assessed during your inspection. If you do not change the forage component of your ration during the grazing season, the pasture you offer may not meet the regulation. As of the writing of this handbook, the regulation is in the process of having pasture and the grazing requirement for ruminants more clearly defined. Contact your certification agency or see the NOP website for current standards regarding pasture.

47. Do animals need to be fed vegetarian feed?

Not necessarily. The National Organic Standards subpart C, section 205.237(b)(5), states "The producer of an organic operation must not feed mammalian or poultry slaughter by-products to mammals or poultry." There is no restriction against organic livestock feed supplements containing appropriate organic milk and organic egg products, or appropriate natural fish products that do not contain prohibited synthetics.

48. Can I sell my organic dairy steers as organic slaughter stock?

- Animals may only be sold as organic slaughter if they have been raised as organic from the last third of gestation. Your steers or bulls are certifiable as organic slaughter animals if they were born from a mother who had been fed 100% certified organic feed and managed organically for at least 3 months before birthing the animal. They cannot have been born during the time the mother was being fed transitional feed, if you have a transitioning dairy herd.
- Remember, organic land cannot retroactively be certified from a previous crop year, so if you plan to birth organic slaughter stock in the spring, make sure the crops you feed in late winter had been inspected and certified organic either on your farm, or crops you may purchase. In other words, if you plan to feed crops from your own farm, you will need to get your crops certified the crop year before your brood cows give birth to organic slaughter stock the following spring. Once brood cows have birthed an organic calf, they must remain under organic management in order to continue birthing organic calves. They cannot be removed from organic production through use of a prohibited health product, for instance, and then become an organic brood cow again.

49. Must all the feed supplements I feed my animals also be certified organic?

No. A natural feed additive (supplement) can be from any source, provided it is not classified as a prohibited substance by the NOS or the National List, and must be in compliance with the Federal Food, Drug and Cosmetic Act. Any agricultural product in the supplement must be certified organic and any organisms verified to be non-GMO.

50. My neighbor says he hasn't used pesticides on his hay. Can I feed it to my certified organic cows?

Any feed fed to organic livestock must be certified organic. If your neighbor gets his hay certified or you rent his ground and get it certified as part of your organic plan, then you can feed it.

51. What are the rules for organic poultry raised for slaughter?

Poultry must be raised as organic (using no prohibited practices and fed 100% certified organic feed) from the second day after chicks are hatched. Purchased day-old chicks do not need to be sourced as organic, but must be managed organically from day two of their life. Poultry must be provided with outdoor access. If poultry eat the materials used for litter, the litter material must be certified organic, i.e., organic hay. Sawdust does not need to be certified organic but you should insure that no prohibited materials have been added to or were part of the source of the sawdust. As with mammals, vaccines are allowed. Careful consideration of bird density and ventilation in hen houses is important, although there are no specific regulations, other than providing living conditions that promote health. Poultry are not mandated to have access to grass, just the outdoors, but they will appreciate having green living things to eat.

52. Do I need to use a certified organic slaughtering facility in order to label fresh or frozen meat as organic?

Yes, you can either slaughter poultry yourself and have this approved as part of your organic certification application, or have a local slaughterhouse certified as part of your organic certification, or use an organic slaughterhouse (see the MOSES resource directory). You can also sell the products to your customers as organic live animals and have them use any slaughterhouse of their choosing. You cannot label any meat as organic unless it had been processed in a certified organic facility.

Crop Production

53. What is a buffer, and how do I know how big it needs to be?

- NOS §205.202(c) requires distinct, defined boundaries and buffer zones to prevent the unintended application of a prohibited substance to land under organic management.
- §205.2 defines "Buffer zone" as "An area located between a certified production operation or portion of a production operation and an adjacent land area that is not maintained under organic management. A buffer zone must be sufficient in size or other features (e.g., windbreaks or a diversion ditch) to prevent the possibility of unintended contact by prohibited substances applied to adjacent land areas with an area that is part of a certified operation."
- Because there are so many variables that can affect the kind of protection needed between organic and nonorganic land, the national standards do not specify specific dimensions for buffer zones. Determination of buffer adequacy is left to the organic producer, the organic inspector and the certifying agent on a case-by-case basis. A typical grassy buffer is between 25 and 30 feet wide, where the risk of drift or runoff would be considered minimal.
- The organic system plan must describe how an organic operation will avoid drift from neighboring operations, particularly drift of prohibited pesticides and herbicides.

54. Genetically Modified Organisms (GMOs) are not allowed in organic production. However, if my product tests positive for GMOs even if I have not used them, will I lose my certification?

- The Preamble to the NOS regulation states: "This regulation prohibits the use of excluded methods (which include GMOs) in organic operations. The presence of a detectable residue of a product of excluded methods alone does not necessarily constitute a violation of this regulation. As long as an organic operation has not used excluded methods and takes reasonable steps to avoid contact with the products of excluded methods as detailed in their approved organic system plan, the unintentional presence of the products of excluded methods should not affect the status of an organic product or operation."
- If a certifying agency has reason to suspect that an organic product has come into contact with prohibited substances or been produced using excluded methods the certifying agent can call for testing, which under certain conditions could result in that product no longer being considered "organic."
- The markets where your organic crops are sold may require zero tolerance of GMOs, regardless of whether or not the crops lose its organic certification. GMO testing is frequently done by the buyers of organic soybeans sold to Japan and European markets and will be rejected if they test positive for GMOs. GMOs are part of the DNA of the entire plant and can be detected in the dust or other residue from GMO crops and so great caution must be taken to protect organic crops.
- If equipment used in planting or harvesting organic crops is also used for conventional crops it is important that you thoroughly clean the equipment before organic use to ensure that no contamination from non-organic or GMO crops occurs. You must document this cleaning in your records. Transport and storage of organic crops must also be in cleaned units, with documentation maintained.

55. Does any manure I use on a certified organic farm need to also be certified organic?

No. You may use manure from any source, as long as it does not contaminate crops, soil or water with heavy metals or residues of prohibited substances, such as arsenic from feed, anti-odor compounds, genetically-modified digesters or prohibited synthetics from the bedding source. Note that European Union requirements are stricter than the NOP requirements in this regard, and specifically do not allow manure from confinement livestock operations.

56. Are there regulations on how I apply animal manure?

- Yes. Manure is very closely regulated in organic systems, particularly for crops that are grown for human consumption. Raw animal manure may be applied to crops not for human consumption as long as it is applied in a manner that does not contaminate crops, soil or water. This may limit

winter spreading. Your certifier may require a manure management plan as part of your certification application.

- Manure that is composted following the NOS may be applied at any time to any crops.
- Raw manure may be applied to crops for human consumption only if:
 - it is incorporated into the soil at least 120 days prior to the harvest of a product that comes into contact with the soil surface or soil particles, or
 - it is incorporated into the soil at least 90 days prior to harvest of plants whose edible portion does not come into direct contact with the soil or soil particles.

57. What are the rules for producing compost for use in my certified organic operation?

- Rules for compost production are quite detailed. They are laid out in the National Organic Standards §205.203(c)(2). If compost is not produced in accordance with these rules, it must be viewed as raw manure and applied as outlined in question 56.
- To produce compost according to the NOS: an initial C:N ratio of between 25:1 and 40:1 must be established; a temperature of between 131° F and 170° F must be maintained for 3 days in a static, aerated pile, or between 131° F and 170° F for 15 days using a windrow composting system; during which materials must be turned at least five times.

58. Can I buy compost to use in my organic operation?

You may purchase compost, but you must obtain documentation that it has been produced in accordance with the USDA organic regulation for compost unless you plan to apply it according to the rules for raw manure.

59. Do the seeds I plant need to be organic? How about for a cover crop?

- Organic seeds are required in all organic production, EXCEPT if the quantity, quality, form and/or variety of seeds desired are not available. If you do not use organic seed, you must keep records of your unsuccessful attempts to obtain organic seed. Higher price is NOT an acceptable reason to not buy organic seed.
- Non-organic seeds must NOT be treated with non-allowed substances or genetically-modified inoculants.
- Seeds must not be genetically modified.
- Seeds for cover crop follow these same rules.
- ATTRA and some certifying agencies can provide you with lists of seed companies that offer organic seed varieties. OMRI also has a new seed source search function that can be very helpful.

60. Are treated seeds allowed?

Seeds may not be treated with non-allowed substances, including anything produced using GMOs. Examples of prohibited seed treatments are Apron and Captan. Legume inoculants are allowed if they are not genetically modified. Natural seed "treatments" such as clay for pelletizing small seeds like carrots are allowed, as long as there is documentation that only natural products are used in the treatment.

61. Must annual plant seedlings be organic?

Yes. All annual plants such as tomatoes and peppers MUST be grown organically or purchased from a certified organic producer. Potting mixes used cannot contain raw manure, nor any synthetic fungicides, fertilizers or wetting agents. Verify with your certifier the potting mix and any soluble nutrients you wish to use are approved before starting your plants. If you plant nonorganic plants into a field, you may lose your certification on that field for 1-3 years. Check with your certifier to be sure. Plants that are grown from bulbs or rhizomes have the same allowance for use of nonorganic as seeds in question 59. Therefore, you can plant nonorganic sweet potato slips or garlic bulbs, if you can prove you could not find the type, quantity etc. If you cannot find or grow organic annual transplants, then you will not be able to grow and sell organic production from that type of crop that year.

62. What are the rules for planting perennials, such as fruit trees, brambles or vines?

Producers must attempt to source organic planting stock, similar to attempts to source organic seeds. If not commercially available from organic sources, conventional planting stock may be used. Planting stock to be used to produce a perennial crop may be considered organically produced after it has been under a system of organic management for at least one year. The only exception to this is for strawberries. If you manage the strawberries as an annual crop, such as planting in the fall, harvesting the next spring and then tilling the plants in, resulting in only one harvest, then, in this case, you can use a nonorganic strawberry plant if you cannot find organic plants. Strawberries harvested more than one year must be under organic management for a full year before selling organic fruit if you started with nonorganic plants.

Processing and Handling

63. If I want to produce organic bread, what are the main things I need to do?

To sell a product as organic, you must use organic ingredients, process in a certified organic processing/handling facility and comply with organic labeling requirements. Verify your label is compliant with NOP regulations with your certification agent BEFORE printing many copies, since there are very specific rules such as where the certification agent name must be printed, the size of the type used and the color scheme of the USDA seal.

64. How do I know if I am "processing" or "handling" a product and must comply with the Organic Rule?

- "Processing" is defined as: cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, distilling, extracting, slaughtering, cutting, fermenting, eviscerating, preserving, dehydrating, freezing, chilling or otherwise manufacturing, packaging, canning, jarring or otherwise enclosing food in a container. If you conduct any of the above processing activities, you are considered a handler under the NOP.
- Post harvest handling, such as washing produce or cleaning grain before going into a bulk bin, is not considered "handling".
- Many farmers will do some of these things in the production of their crops or livestock, such as through harvesting or cleaning feed. These processes must be certified along with fields and animals in order to produce a certified organic product. Individuals that operate plants or facilities that take a product and further process or handle it after delivery from a farmer must also be certified in order for the final product to be considered certified organic.

65. Does my processing facility need to be certified for organic production?

Yes. Each facility where organic product is processed or handled, from tortilla chips to butchered chickens or hogs, must be certified for organic production, with the exceptions as stated below. Each facility will need to apply for certification, develop an organic handling plan, fill out a processor or handler application, have the inspection, pay fees and keep comprehensive records.

- All the buildings where ingredients are stored, all equipment used, product packaging and any storage for the final product must be inspected
- All the cleaning products used must be on the National List, or have any residues somehow removed (such as a clear water rinse) before organic production or separated from organic production so that there is no threat of contaminating the organic product.
- The processor must have a pest management plan that focuses on prevention of pest problems by removal of habitat, food sources and breeding areas, prevent access to facility by pests, and managing environmental factors (light, temperature, humidity, atmosphere and/or air circulation) to prevent pest reproduction. The plan may also use mechanical or physical controls including traps, light or sound, and lures and repellents using approved substances. Only if these practices are not effective, pest control products on the National List may be used. If National List approved substances are not effective, then conventional pest control substances may be used with the

approval of the certifying agency. Measures must be taken to protect against pest control substance contact with organic products and packaging materials. These various stages of pest control must be documented as being performed in this sequence in order to meet the NOP regulations.

- Your facility does not have to be 100% organic. You may also process conventional products as long as organic products are protected from commingling with non-organic products and contamination from prohibited substances. Equipment must be cleaned and/or purged with organic product to prevent commingling and contamination. Records must show that organic integrity is maintained throughout the process at the facility.

- All certified processing or handling facilities must follow NOS record keeping requirements. Records that need to be kept include: proof of certification for organic ingredients, verification that any nonorganic ingredients also meet organic requirements, inventory, storage and sales records and pest control records. Records must track all ingredients and finished products in their flow through the facility, and must be able to show that contamination and commingling were avoided in all processing/handling steps.

- As with on-farm production, there is a small producer exemption of \$5,000 annual sales of organic product. A small producer may label their product as organic as long as they follow the NOS, including all record keeping.

- A handler that receives containers of certified organic product and only transfers or stores that product without removing, altering or further processing the contents does not have to be inspected in order to sell that product as certified organic.

66. What are the rules for identifying my organically processed product?

The percent of the total that is organic ingredients in a product will determine exactly what your label can say. All organic ingredients must be identified as "organic" in the ingredient list for all labeling categories.

- **100% Organic:** The final product contains only 100% agricultural products and these are 100% certified organic. If processing aids are used, they must also be agricultural and certified organic. If a synthetic processing aid allowed in organic production is used, then the product cannot be labeled as 100% organic. You may use the USDA Organic and/or the certifier's seal.

- **Organic:** The final product contains at least 95% (by weight or fluid volume) organic ingredients (excluding water and salt). Agriculturally produced ingredients must be organic unless present on 205.506 as not being commercially available as organic, as well as proof of a current search verifying it is still not available organically. No ingredients may be irradiated, genetically engineered or grown using sewage sludge. All remaining ingredients and processing aids must follow the National List. You may use the "USDA Organic" or certifier's seal.

- **Made with organic ingredients:** The final product contains at least 70% organic ingredients by weight or fluid volume (excluding water and salt). Conventional agricultural products may be used in the remaining 30%, but they cannot be irradiated, genetically engineered or grown using sewage sludge. All non-agricultural ingredients and processing aids must follow the National List. You can list up to 3 organic ingredients or 3 food groups on the front panel. You may use the certifier's seal, but not the "USDA Organic" seal.

- **List of ingredients with organic products identified:** If your product contains less than 70% organic product (by weight or fluid volume) then you may not make an organic claim on the principal display panel, but may identify items on the ingredients list as organic. You may list the percent of organic ingredients used on the information panel. For example, a cereal ingredient list can state: Ingredients: corn, organic oats, wheat.. etc.

In this case there are no restrictions on any non-organic ingredients. If your final products are in this category, they do not have to be processed in a certified organic processing plant. You may not use the "USDA Organic" or certifier's seal.

- **Livestock feed:** Feed labeled as "organic" must contain agricultural products that are 100% certified organic. However, it may also include any percentage of feed additives and supplements consistent with the National List. Nonorganic agricultural products are not allowed.

- **Bulk non-retail sales:** All bulk sales of organic processed products or organic single commodities must have a unique lot number on all transfer documents, identifying that specific shipment and tracking it back to production or storage.

Marketing

67. Are there regulations in how my label looks and what information I need to put on the label?

Yes. Labels are closely regulated, particularly the types of organic claims that can be made based on finished product content and certifier and handler identification information. You may get details from your certification agency or check NOS §205.303-311.

- Labels must also state the phrase "Certified organic by (your certifying agency)" and must identify the processor or distributor of the finished product. Use of a certifying agent seal or logo is optional.
- The USDA Organic Seal can be used on the labels of products in the "100% organic," "organic," and livestock feed categories, but there are restrictions on its size and color.
- All retail labels should also comply with all State and Federal regulations for that type of product.

68. Where can I sell my organic products?

- The organic marketplace is quickly developing. It is very important that you explore market opportunities as you undergo organic transition.
- The NewFarm website (www.newfarm.org) has a large amount of organic market information. The Upper Midwest Organic Resource Directory (UMORD) lists marketing agencies, co-ops and companies and the products they are buying. The Organic Broadcaster Newspaper offers classified ads for those wishing to sell to other farmers in the Midwest. Your local Extension Agent may be aware of local market opportunities.
- The Organic Trade Association (OTA) has an on-line directory of over 1600 companies that buy and use organic products.
- Talk to other organic farmers about their markets and market opportunities.
- If you are willing to be somewhat of an entrepreneur, there are retail stores, schools, restaurants, and farmer's markets that could be a source of income for any value added products you may choose to develop. Grain farmers could grind flour and make pancake mixes, beef producers could sell organic cuts of meat, vegetable producers could make salsas or pickles, the opportunities are only as limited as your imagination!

69. Should I assume that if I am certified organic in the U.S. that I can sell my organic product in the international marketplace?

No. The U.S. NOP is not in complete accord with other countries' organic standards. For instance, in the EU, the organic farmer cannot use manure or compost produced from large confinement animal operations. If you wish to sell in an international marketplace, check with a certification agency to find out the specific requirements for your target market. Japan, Korea, Taiwan and Canada all have their own regulations. Countries around the world are in continuous development of new organic standards.

70. How do I know what price to charge?

Guidelines for pricing organic product are similar to those of any other product.

- If you are selling your product as a raw, unprocessed commodity (e.g., corn to a feed mill) you may be offered a posted price.
- Those who direct market or create processed products will want to do a cost analysis of their production so that they understand the price they need to make a profit on their product. Required record keeping for organic production can help you understand the costs that go into your production.

71. Can I expect to get a better price for my organic product than a conventional product?

Organic prices have historically been higher than those for similar products that are conventionally produced. This is especially true for dairy products, where prices have historically been 15-20% higher than those for conventional dairy products. However, there is no guarantee that you will get

more for an organic product. It is important to secure a market for your product and get a sense of the price you will receive before you produce the product.

72. Can I sell my product as organic if I am still in transition?

No. A transitional product may not be sold as organic. It must be sold as a conventional product. There is no specific regulation defining transitional crops, and therefore there is no legal label for products in transition to organic production.

73. Who can I sell my organic product to if I fall under the small farm exemption and am not certified?

Those under the small farm exemption may sell their products as organic as long as they follow the NOS and do not sell their product in any situation where it will be further processed into an organic product or fed to certified organic livestock. This means that your "exempt" tomatoes can't be part of a certified organic salsa where you sell the tomatoes to another individual or company. You can make your own organic salsa, as long as your total sales of all organic products, fresh and processed, is less than \$5,000 per year and you sell direct to consumer only. Those falling under the small farm exemption may label their products as organic when selling direct to consumers, at a farmers market or when selling to anyone such as a retail store, who will not further process the product.

74. Does my retail food co-op or store need to be certified organic to handle my product?

No, retail stores, as long as they do not process an organic product and distribute these organic products to another location, are allowed to handle and sell organic products without being certified. Retail stores are required to prevent organic product contamination with prohibited substances and label organic products correctly. Some retail stores are voluntarily getting organic certification for their storefronts.

75. How can I convey the "organic difference" in my direct marketing?

- Many consumers have heard the term "organic" but may not understand all that it entails. Many organic producers have found it valuable to provide educational materials on the details of their organic production practices to their customers. For help in creating materials for customers, visit the MOSES website at <http://www.mosesorganic.org/factsheets/index.htm> and look at the articles listed under "Organic Marketing Issues."

- Your local Extension Agent can offer suggestions on creating a brochure that will highlight the specifics of your operation, including the details of your organic production practices.

Steps to Organic Certification

- The producer contacts certification agencies working in their area and decides on an agency. (See the MOSES Fact Sheet: "How to Choose a Certification Agency.") There is value to remaining with the same agency from year to year, and this is encouraged. The chosen agency sends a packet containing the National Organic Standards and an application. There may be a cost for this packet. (\$50- \$60 is common)

Application

- The producer completes the application. For producers this includes management plans, field maps, field histories, strategies for controlling weeds and insects, soil fertility, crop rotation, inputs (fertilizers, insecticides, seeds) harvest and storage plans. A separate application addresses livestock management. Processor's applications include facilities and product flow descriptions, ingredients information, cleaning and sanitation procedures and products, quality control information and pest management strategies. The application will take between 2 and 8 hours to complete the first year. The subsequent annual renewal questionnaires request information about changes and will take less time to complete.

- The certification agency reviews the application and attached documentation, making sure all necessary information is provided, and reviews the application to determine whether or not there are any noncompliances apparent that would rule out proceeding with the process. This step does not guarantee certification, but it allows the applicant to withdraw if it appears the certification request cannot be met without incurring the further cost of inspection.

Inspection

- The file is assigned to an organic inspector, who has received specific and complete training on organic standards. Inspectors are assigned a group of inspections to perform in a particular geographic region. Files include the application, all submitted information, results of the initial review and any other pertinent communications between you and the certifier. The inspector contacts the applicant either by phone or mail to set up the inspection time, get directions to the operation and discuss any questions about the application or to note any additional information needed at the inspection.

- The producer is responsible for the full cost of the inspection, which includes the on-site inspectors time, time needed to complete the inspection report, mileage, lodging, meals and miscellaneous expenses. A deposit on the inspection costs is likely to have been required with the application.

- The inspector performs the inspection. Depending on the size and complexity of the operation, this can take 2-6 hours. Farms with livestock or on-farm processing (e.g. seed cleaning) or organic processing operations will require lengthier inspection times.

- An on-site affidavit may need to be completed and signed during the inspection. A copy remains with the applicant, a copy goes to the certifier and a copy stays with the inspector.

- The inspector completes the inspection report and sends it along with the complete file, any documents collected during the inspection and the inspection bill to the certification agency. Upon receipt of the report, agencies may send a copy to you to verify accuracy. You also will receive a notice of the full inspection costs.

Review

- The certifier receives the inspection report. THE AGENCY AND THE INSPECTOR KEEP ALL INFORMATION CONFIDENTIAL. However, agencies do answer inquiries as to whether or not an

operation is certified by them and what products are certified. All information is accessible to the NOP, and certifiers provide noncompliance information to each other as requested.

- The file is reviewed by a representative of the certification agency. In some cases, more than one individual performs the review. If no additional information is needed, a certification decision is made. Certification is either granted, granted with conditions, or denied. Conditions may need to be met immediately, within a certain time period or before the next inspection.

- The applicant is notified of the results of the certification review. If certified, you will receive a certificate, which lists organic products for which you are certified. Agencies have clear appeal policies if the certification decision is contested.

- If certified, the producer may now sell certified organic products. Organic standards need to be followed throughout the year. Documentation of storage and sales need to be maintained for review at the next year's inspection. Organic production records need to be retained at least 5 years.

- Some buyers of organic products require, in addition to or instead of a copy of the operation's certificate, an actual certificate for the product you are selling them. These are usually called transaction certificates. If this is something you will need for organic sales, make sure your certifier offers this service and find out whether or not they charge any additional fees for this service.

- As part of the certification process you will be required to sign a contract or licensing agreement with your certifier. This legal document describes mutual and respective responsibilities. As part of certification you also agree to any unannounced inspections the certifier may deem necessary, either in investigation of noncompliance or as part of the certifier's required surveillance activities.

Continuation

- A questionnaire noting any organic plan changes must be completed and turned in and an inspection will be scheduled each year if continued organic certification is requested. The individual inspector will most likely change. Continuance or withdrawal of organic certification is determined annually using the same procedure as described above. If you are farming, your inspection will be scheduled during the growing season each year, although it may not occur in the same month each time.

Appendix A: Resources

ATTRA The National Sustainable Agriculture Information Service --a project of NCAT

P.O. Box 3657, Fayetteville, AR 72702 800/346-9140 www.attra.ncat.org

Providing free publications on specific organic and sustainable production methods, crops, marketing, and organizations. Technical specialists will prepare custom resource packets for subjects not currently in print. Created and managed by the National Center for Appropriate Technology (NCAT).

Midwest Organic and Sustainable Education Service (MOSES)

PO Box 339, Spring Valley, WI 54767 715/772-3153 Fax: 715/772-3162 info@mosesorganic.org

www.mosesorganic.org Organic Farmer Info Line 888-551-4769

'Helping agriculture make the transition.' A farmer-run nonprofit educational outreach organization dedicated to organic farming. Organizes Upper Midwest Organic Farming Conference (UMOFC) in late February, offers books, Organic Fact Sheets, other resources and signs. Provides organic production and certification workshops to farmers and agricultural education professionals. MOSES is the publisher of the Upper Midwest Organic Resource Directory and this Guidebook.

NewFarm, The Rodale Institute

611 Siegfriedale Rd, Kutztown, PA 19530 610/683-1416 www.newfarm.org

NewFarm.org presents compelling success stories with expert resources for crop and livestock production, direct marketing, local food systems, policy campaigns and community building collaborations.

Organic Farming Research Foundation (OFRF)

P.O. Box 440, Santa Cruz, CA 95061 831/426-6606 Fax: 408/426-6670 research@ofrf.org www.ofrf.org

OFRF is a nonprofit foundation that sponsors research related to organic farming practices, publishes research results for organic farmers and growers interested in adopting organic production systems, and educates the public and decision-makers about organic farming issues.

Organic Materials Review Institute (OMRI)

PO Box 11558, Eugene, OR 97440 541/343-7600 Fax: 541/343-8971 info@omri.org www.omri.org

OMRI lists and offers trademarked seal to approved products for use in the production of organic food and fiber. Uses USDA National Organic Program criteria to evaluate (allow, regulate, or prohibit) products. The comprehensive OMRI Generic Materials list is used by many USDA accredited certifiers as a guide and supplement to the National List of approved and non-approved substances for organic production.

Sustainable Agriculture Research and Education (SARE) Program, North Central Region SARE

University of Nebraska-Lincoln, 13A Activities Bldg., 1734 N. 34th Street, Lincoln, NE 68583-0840

402/472-7081 ncrsare@unl.edu www.sare.org/ncrsare

Administered by USDA-CSREES, SARE sponsors grants for farmers, researchers and ag professionals that advance farming and ranching systems that are profitable, environmentally sound, and good for families & communities.

USDA National Organic Program

1400 Independence Ave SW, Room 4008 South, Washington, DC 20250 202/720-3252

Francine.Torres@usda.gov www.ams.usda.gov/nop

This government agency oversees national organic standards, accredits organic certification agencies, and provides general information on its policies and activities through its website.

University of WI-Extension Emerging Agriculture Markets Team

www.uwex.edu/ces/ag/teams/emerging/ Team co-leaders: Rose Skora rose.skora@ces.uwex.edu 262-886-8460

(Racine) 262-857-1948 (Kenosha) Keith VanderVelde keith.vandervelder@ces.uwex.edu 608-297-9153 *A statewide organization made up of University of Wisconsin -- Extension professionals and other individuals interested in helping farmers and communities identify and take advantage of opportunities in new and emerging agricultural markets.*

Wisconsin Dept. of Agriculture, Trade and Consumer Protection

2811 Agriculture Drive PO Box 8911, Madison, WI 53708-8911 608/224-5120 laura.paine@datcp.state.wi.us www.datcp.state.wi.us

Funds on-farm demonstration and educational efforts to increase public awareness of the benefits of sustainable farming through the Agricultural Development and Diversification Grant Program. Organic certification cost-share program available.

Appendix B: Dairy Animal Acquisition under the NOP Regulations

Dairy Animal Acquisition under the NOP Regulations

Purpose

This document is for use by National Organic Program (NOP) producers and certifying agents in determining what classes of dairy animals are appropriate for acquisition under the NOP regulations. These guidelines only clarify existing NOP regulations and will be updated as the regulations are revised.

If You:	Then You May Acquire the Following Class(es) of Dairy Animals:
Were certified organic prior to October 21, 2002.	<ol style="list-style-type: none"> 1. Conventional (Note: Conversion using the 80-20 exemption must be complete by June 9, 2007);* 2. Converted feeding 100% organic feed;** 3. Converted under 80-20;** 4. Organic from last 3rd of gestation;** 5. Born of an organic mother.**
Were certified organic after October 21, 2002, and fed 100% organic feed during conversion.	<ol style="list-style-type: none"> 1. Conventional (Note: Conversion using the 80-20 exemption must be complete by June 9, 2007);* 2. Converted feeding 100% organic feed;** 3. Converted under 80-20; ** 4. Organic from last 3rd of gestation;** 5. Born of an organic mother. **
Were certified organic after October 21, 2002, and converted using the 80-20 feed exemption.	Organic from last 3 rd of gestation.**
Are currently in transition to organic and feeding 100% organic feed during the 12-month dairy animal conversion period.	None. You must complete certification before adding animals from off your farm to your herd. Any organic animal that leaves a certified operation loses its organic status when it enters a non-certified operation.
Are currently in transition to organic and converting using the 80-20 feed exemption during the 12-month dairy animal conversion period.	None. You must complete certification before adding animals from off your farm to your herd. Any organic animal that leaves a certified operation loses its organic status when it enters a non-certified operation.
Are currently in transition to organic and feeding crops and forage from land, in your organic systems plan, that is in the third year of organic management during the 12-month dairy animal conversion period.	None. You must complete certification before adding animals from off your farm to your herd. Any organic animal that leaves a certified operation loses its organic status when it enters a non-certified operation.
Are a new dairy, certified, with no dairy animals	<ol style="list-style-type: none"> 1. Conventional (Note: Conversion using the 80-20 exemption must be complete by June 9, 2007);* 2. Converted feeding 100% organic feed;** 3. Converted under 80-20;** 4. Organic from last 3rd of gestation;** 5. Born of an organic mother. **

*Milk from these animals eligible to be labeled as organic after 12 months of continuous organic management.

**Milk from these animals is immediately eligible to be labeled as organic.

Index

A

annual certification fee 5
antibiotics 12
application 5, 6, 14, 15, 16, 20
approved products 11, 22
ATTRA 6, 10, 15, 22

B

bedding plants 22
benefits of organic 2
Biosuisse 9
buffer 14
buildings 16
bulls 22

C

certificate 7, 21
certification agency 5, 6, 7, 9, 11, 12, 18, 20, 21
certification process 4, 6, 7, 21
chemicals 2
cleaning products 16
commingling 17
commodity 9, 18
compost 15, 18
cost 5, 18, 20, 22
cover crop 15

D

dairy 2, 11, 12, 13, 18
direct market 18
documentation 14, 20

E

EQIP 5
equipment 14, 16
EU 9, 18
exempt 2, 4, 19
Extension Agent 18, 19

F

Federal Register 4, 10
feed 4, 11, 12, 13, 14, 16, 17, 18
fees 22
fertilizers 10, 11, 20
field days 5, 10
field maps 8, 20
food co-op 19
fruit trees 16

G

Generic 22
genetically modified 12, 13, 15, 17
grants 5, 22

H

health benefits 2
health care 12

I

IFOAM 9
inoculants 11, 12, 15
inputs 2, 9, 10, 12, 20
inspection 5, 6, 7, 14, 16, 20, 21
international 7, 9, 18
irradiated 17

J

JAS 9

L

label 17, 18, 19
licensing agreement 21
lime 2, 11
litter 13
livestock 2, 4, 5, 6, 7, 10, 12, 13, 16, 18, 19, 20, 22

M

manure 14, 15, 18
market demand 2
materials 5, 8, 9, 10, 11, 13, 15, 17, 19
mined products 2
minerals 11, 12
MOSES 3, 5, 6, 9, 10, 19, 22

N

National List 10, 12, 13, 16, 17, 22
National Organic Program 2, 3, 5, 6, 7, 22
National Organic Standards 2, 3, 5, 10, 13, 15, 20
National Organic Standards Board 3, 10
natural substances 10
New Farm 6, 10
non-approved 12, 22
non-synthetic 10
non-compliances 7, 20
NOP 2, 3, 4, 5, 8, 9, 10, 14, 16, 18, 21
NOS 2, 9, 12, 13, 14, 15, 17, 18, 19
NOSB 3, 10
NRCS 5

O

OMRI 10, 11, 22
Organic Broadcaster 5, 18
organic claims 18
organic farm plan 5, 6, 7, 8, 13, 21
Organic Foods Production Act 2, 3
outdoor access 13

P

pasture 12
penalties 3
perennials 16
pest control 10, 16, 17
potential markets 6

poultry 13
preventative care 12
price 2, 18, 19
processor 10, 16, 18
profits 2
prohibited practices 8, 13
property 8

Q

questions 1, 5, 6, 11, 20

R

record keeping 4, 17, 18
rental agreement 8
replacements 12
research studies 2
Rodale Institute 10, 22
ruminants 12

S

salt 2, 11, 17
seeds 9, 15, 16, 20
sewage sludge 17
slaughter 12, 13
small farm exemption 19
soil and water quality 2
soybeans 9, 14
storage 14, 16, 17, 20, 21
supplements 11, 12, 13, 17

T

testing 9, 14
timeline 6
transaction certificates 21
transition 5, 8, 12, 18, 19, 22
transitional product 19
transport 14
treated lumber 11
treated seeds 15

U

Upper Midwest Organic Farming Conference 5, 9, 22
Upper Midwest Organic Resource Directory 6, 9, 10, 18, 22
USDA 2, 6, 7, 10, 17, 18, 22
USDA Organic Seal 18
user fees 5

V

vaccination 12

W

water test 8, 9
workshops 5, 9, 22



About MOSES

Midwest Organic and Sustainable Education Service

"Our mission is to help agriculture make the transition to a sustainable organic system of farming that is ecologically sound, economically viable, and socially just, through information, education, research, and integrating the broader community into this effort."

MOSES Projects and Activities

- The Upper Midwest Organic Farming Conference (UMOFC) held in late February each year offers high quality education, networking and resources with informational workshops, inspiring keynotes, a huge organic trade show, remarkable food and plenty of fun!
- Full-day intensive Organic University courses preceding the Conference provide opportunity for in-depth learning.
- The "Help Wanted: Organic Farmers" campaign has the goal of increasing the number of organic farmers in the region. The campaign provides free resources on transitioning to organic production to farmers.
- The Organic Broadcaster, a bi-monthly newspaper provides quality, farmer oriented information to hundreds of farmers in the Upper Midwest.
- The MOSES website at www.mosesorganic.org offers an up-to-date calendar and numerous resources.
- The Upper Midwest Organic Resource Directory, with more than 70 pages of organizations, resources, certification agencies, and businesses serving organic producers. Available in hard copy or on the MOSES website.
- Organic Basics trainings, funded in 2004-2007 by University of Wisconsin Extension - Emerging Ag Markets Team, are intensive day-long trainings to farmers in Wisconsin on organic certification.
- Organic Dairy Farming a 192-page full-size paperback book published in 2006 and available from the MOSES bookstore.
- The Midwest Organic Tree Fruit Grower Network offers field days, an informative website and newsletters.

For more information on these and other MOSES projects,
visit the MOSES website at www.mosesorganic.org

Midwest Organic and Sustainable Education Service
PO Box 339, Spring Valley, WI 54767
715-772-3153 www.mosesorganic.org info@mosesorganic.org