

Organic Certification of Peas

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Most NOP references are not
direct quotes from the Rule

Overview

- Certification Process
- National Organic Standards
- National List – can I use this product?
- Organic Management Plan

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National Certification

- One National Organic Standard (NOS) since October, 2002.
- Certifying agencies are accredited by the USDA: www.ams.usda.gov/nop
- Producers are certified by USDA accredited State or private agencies
- Standards cover organic crops, livestock and processing (eg. IQF)

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Certification Process

1. Review the standards and decide whether to apply for certification
2. Submit an organic management plan (application form) and fees to an accredited certifier
3. Application reviewed, additional information
4. On-site inspection
 - a. Is the management plan accurate?
 - b. Are these practices compliant with NOS?
 - c. Exit interview – potential issues identified
5. Inspection report

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Certification Process

5. Inspection report reviewed by certifier
6. Certification Decision Letter and resolution of noncompliances
7. Contract signed & certificate issued
8. Annual inspection
9. Unannounced inspections

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Enforcement

- Certification process & complaints
- Denial of certification
- Suspension
- Revocation
- Mediation
- Willful violations or false statements - \$10,000 fine per violation

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National Organic Standards



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§ 205.101 What has to be certified

(a) Any operation that produces or handles agricultural products “intended to be sold, labeled or represented” as organic.

Exempt or excluded operations are not required to be certified

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§ 205.101 Exemptions & exclusions

- ... “gross agricultural income from organic sales totals \$5,000 or less annually”... Unless products are an ingredient in a certified organic product
- Retailers that do not process organic food
- Processed products with less than 70% organic ingredients
- Restaurants
- Handlers of packaged products

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Organic Standards

“*Organic production.* A production system that... respond(s) to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.”

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§ 205.202 Land requirements

- a. Apply no prohibited substances for 3 years before harvest of an organic crop (transitional status)
- b. Have boundaries and buffer zones to prevent the unintended application of a prohibited substance



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Land requirements - verification

- Manager statement: plan and correspondence are legal documents
- Receipts, crop history
- Visible evidence during inspection
- Soil tests (eg. organochlorine insecticides)
- Certifier knowledge of a region

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§ 205.204 Seeds and planting stock

Organic seed and planting stock is required unless:

- Equivalent variety not commercially available (except sprouts): form, quality and quantity (must be untreated) – includes cover crops
- Non-organic planting stock must be managed organically for at least 1 year

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Organic seeds & planting stock

- Catalogs from seed and scion searches
- Receipts and tags
- Statements from producers and customers
- Audits during inspections

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§ 205.205 Crop Rotation

Provide the following functions:

- a. Maintain or improve organic matter
- b. Provide pest management
- c. Manage deficient or excess nutrients
- d. Provide erosion control



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§ 205.203 Soil fertility



- Improve chemical, physical and biological condition of the soil
- Manure: 90-120 day harvest intervals
- Composted manure: 131-170°F for 3-days – no PHI
- Allowed inputs
- Biosolids, crop burning (except for disease control) and most synthetic fertilizers are prohibited

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§ 205.206 Pest management

- a. Prevention: rotation, sanitation and resistance
- b. Natural enemies, lures, traps and repellents
- c. Weed control: mulch, mow, graze, cultivate, flame, plastic mulch
- d. Disease prevention and nonsynthetic biological, botanical or mineral inputs



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§ 205.206 Pest management

- e. If (a)-(d) are insufficient, a biological or botanical substance or allowed synthetic may be used.

An Integrated Pest Management approach



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§ 205.105 Allowed materials and methods

- Synthetic materials are prohibited, except for the list of exceptions
- Non-synthetic materials are allowed, except for the list of exceptions
- Many allowed synthetics have restrictions on their manufacture or use
- Genetically modified organisms, biosolids and ionizing radiation are prohibited

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Synthetic

A substance that is formulated or manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources, except that such term shall not apply to substances created by naturally occurring biological processes.

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Is this material allowed?

1. Check for current OMRI or WSDA approval of the brand name product, if not listed:
2. Evaluate labeled ingredients for NOP compliance (OMRI's generic materials list is helpful)
3. Remember, synthetic inert ingredients in pesticides must be on EPA List 4
4. Contact the manufacturer if necessary and document their response
5. Be sure to follow any use restrictions

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Record Keeping

- Cover production, harvest and handling
- Adapted to the business
- Maintained for at least 5-years
- Demonstrate compliance

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Record Keeping

- Seed catalogs, receipts and bags
- Fertilizer and pesticide receipts and labels
- Feed and medication receipts and labels
- Input application records
- Harvest records (pre-harvest intervals)
- Sales records

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Organic processing

- Simple on-farm processing may be part of the farm plan
 - Only processing your farm products
 - No or very limited other ingredients
 - Contact your certifier – wine must be certified
- \$5000 exemption – but must follow NOS

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§ 205.271 Pest management

1. Prevention
2. Traps, lures, repellents or other NOS compliant materials
3. If insufficient a material not in the National List may be used if any contact with organic products is prevented and use is justified and approved by certifier

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§ 205.272 Commingling and contamination

- 100% organic? Lot numbers
- Use of non-organic substances?
 - Dedicated equipment
 - Documented cleaning to prevent contamination

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§ 205.301 Product composition

- 100% organic
- Organic
 - $\geq 95\%$ organic ingredients
 - Commercial unavailability
- Made with organic...
 - $\geq 70\%$ organic ingredients
 - Sulfur dioxide
- $>70\%$ organic ingredients

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Some resources

- USDA website:
<http://www.ams.usda.gov/nop/indexNet.htm>
- Oregon Tilth website: <http://www.tilth.org/>
- WSDA Organic Program website:
<http://agr.wa.gov/FoodAnimal/Organic/>
- OMRI website: <http://www.omri.org/>
- Organic Compliance Handbook website:
<http://www.sarep.ucdavis.edu/organic/complianceguide/intro.htm>

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