Becoming a Certified Organic Fresh Market Grower

Karen Delahaut, Fresh Market Vegetable Outreach Specialist
Harriet Behar, Independent Organic Inspector

with support from
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at the Center for Integrated Agricultural Systems

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The **Integrated Pest Management Program** expands the use of IPM in Wisconsin crops to reduce the use of chemical pesticides, increase the use of cultural and biological pest control tactics, improve production efficiency and maintain the competitiveness of Wisconsin growers by producing crops with the lowest pesticide inputs necessary. Go to http://ipcm.wisc.edu for more information.

PURR is the collective effort of 14 agricultural organizations that are working together to reduce pesticide use and risk through Integrated Pest Management and other system strategies. For more information on PURR and its member organizations, go to http://www.thinkIPM.org

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The number of fresh market vegetable growers has increased steadily over the past few years and many of these growers are interested in producing a crop organically. As a result, organic production has evolved from a small, niche market to a $10 billion industry in 2002. This publication is designed to help new growers work through the steps necessary to obtain organic certification.

Organic Food Production Act

Organic production is defined as an ecologically based, whole food network that encompasses all segments of the food chain from the grower to the consumer. The goal is to create a diverse, environmentally and economically sustainable agricultural system. Some of the key components of an organic farming system are to replenish and maintain soil fertility; eliminate the use of synthetic pesticides and fertilizers; promote and enhance biodiversity; encourage soil biological activity; utilize crop rotations to manage pests; and conserve natural habitats.

As organic products gained popularity during the 1970s, consumers began to question whether purchased products were truly organic. The "third-party certification" program developed to assure the consumer that certain standards were met in the production of organic foods. The third-party certifiers evaluated the producers, processors, and all other handlers of the product to assure that they conformed to a set of organic standards. Organic certification allows consumers to identify and reward producers who meet the organic standards. However, because these certifying agencies were independent, many of the standards varied between agencies and one certifier wouldn't accept another certifier's recommendation that a product was organic. This led the organic community to pursue a national standard by which all certifying agencies would comply.

Organic production has grown to a $10 billion industry

The Organic Food Production Act, introduced in 1990 as part of the Farm Bill, forms the basis for the National Organic Program. It is the National Organic Program that oversees the implementation and certification of organic certifiers. The Organic Standards (also referred to as the Organic Rule), produced as part of the Act, provide a nationally uniform definition of the term "organic" and

[1] Much of the content of this publication was provided from the speaker notes compiled by Harriet Behar for an Organic Agriculture Regulation and Production Workshop conducted by the Midwest Organic and Sustainable Education Service (MOSES).

Making the decision to switch to certified organic is a big commitment

provide guidelines for export standards. A National Organic Standards Board was formed to prepare the National List of Materials from which organic growers can refer when choosing inputs for their farm. The Board, which is comprised of farmers, certifiers, processors, scientists, environmentalists, retailers, and consumers, is also charged with reviewing the Organic Standards and making revisions as necessary. After many years of discussion and several revisions, the National Organic Standards were finally implemented in October 2002. As a result, only those products grown in accordance with the USDA standards and certified by an accredited certifying agency can be labeled as organic. Growers selling $5,000 or less of organic products a year are not required to become certified, however, if they are selling their products as organic, they must follow the federal organic standards. There are several definitions associated with the organic standards. These can be found in the box below.

Transitioning to Organic Production

When you begin to consider transitioning your farm to organic production, choose a certifying agency and request an application

Organic Agriculture Terminology

Buffer Zone: An area located between a certified 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 an organic operation.

Drift: The physical movement of prohibited substances from the intended target site onto an organic operation or portion thereof.

Excluded Methods: A variety of methods used to genetically modify organisms (GMOs) or influence their growth and development by means that are not possible under natural conditions or processes are not considered compatible with organic production. Allowed methods include traditional breeding, conjunction, fermentation, hybridization, in vitro fertilization, and tissue culture.

Prohibited Substance: A natural substance that is either prohibited for use, or a synthetic substance that is specifically not provided for use under the Rule. Items produced using GMO technology, sewage sludge, and irradiation are not allowed.

Organic System Plan: A plan of management for an organic production or handling operation that has been agreed to by the producer or handler and the certifying agent and that includes written plans concerning all aspects of agricultural production or handling described in the Act and regulations.

questionnaire. To "transition your land" means that the land you wish to certify as organic must be free of all prohibited substances for a minimum of three years prior to the harvest of a certified organic crop. Near the end of the transition period, you should begin the certification process so you can become certified as soon as your transition is complete. Visit the Organic Materials Review Institute (OMRI) web site at http://www.omri.org/ to find out what materials are allowed and what is prohibited. You should also obtain and read a complete set of the National Organic Standards at http://www.ams.usda.gov/nop/NOP/standards.html. For most market growers the actual certification process itself will take between three and six months to complete.

Certified Organic Seed

Growers are required to plant certified organic seed for crops they wish to have certified unless the producer proves that the seed they wish to plant is not commercially available. In this case proof must be provided that an attempt was made to obtain organic seed. This proof can be telephone logs, seed catalogs and letters from seed suppliers stating that certified organic seed is not available. High price is not an acceptable reason for not purchasing organic seed. If certified organic seed is not available for the crops and varieties to be grown, a "Non-GMO Affidavit" must be obtained for all purchased non-organic seed.

Harvest and Storage

During and after harvest, certified organic produce must be kept separate from produce that is conventionally grown. There can be no co-mingling of organic and non-organic products or contamination through contact with prohibited substances. Equipment that is used to harvest conventionally grown crops as well as organic crops must be thoroughly cleaned after the conventional crop has been harvested and the grower must provide an "On-farm Cleaning Affidavit." Storage facilities for organic products must be separate and labeled as such.

Manure and Compost

The National Organic Standards have very strict guidelines on the use of manure and compost in organic production systems. All manure must be composted if applied to vegetable crops destined for human consumption, unless it is applied at least 120 days before vegetable crops will be harvested, if the edible vegetable comes into contact with the soil. In general, all raw manure must be applied to the field in the fall prior to vegetable crop planting to achieve the four-month waiting period. If the edible portion of the crop does not come into contact with the soil (i.e. sweet corn), raw manure may be

During and after harvest, certified organic produce must be kept separate from conventionally grown produce

The National Organic Standards have very strict guidelines for manure and compost

applied 90 days or more before harvest. Dehydrated, pelletized chicken manure is not considered to be composted and thus must be applied following the 120- or 90-day guidelines.

Compost is defined as a product derived from plant and animal materials. Very little compost produced in the United States can be considered acceptable for organic production because the USDA guidelines for organic compost are still so new and/or not followed. To be considered organic, 1) the initial carbon:nitrogen ratio must be between 25:1 and 40:1; 2) the temperature maintained between 131-170°F for at least 15 days; and 3) the compost heap turned a minimum of five times during that period.

Choosing a Certifying Agency

The first step in the certification process is the selection of a certifying agency. Make sure the prospective certifying agency is accredited by the National Organic Program. These certifiers work as an extension of the federal government to certify growers as organic. At the time of printing, there are two accredited, Wisconsin-based certifying agencies: OCIA – the Organic Crop Improvement Association, and MOSA—the Midwest Organic Services Association. Visit the National Organic Program web site at http://www.ams.usda.gov/nop/indexIE.htm before selecting a certifying agency, as there will likely be other certifiers available. Before choosing a certification agency, talk to other organic farmers about their experiences with their certifiers. Also talk to the various certifiers. The following questions will help you get started:

1. What agency or agencies do the farmers use?
2. Are the farmers happy with the services they've received?
3. Does the certification agency answer the farmers' questions quickly and clearly?
4. Do they complete the certification process in a timely manner?
5. How much does organic certification cost?
6. What other benefits do the growers get from being a member of this organization?

Specific questions for certifying agencies include:

1. Do they certify farmers in your location?
2. What services do they provide?
3. Do they sponsor any educational activities and/or field days?
4. Are they a membership-based organization and what is the membership fee?
5. What is the application processing fee?

6. What is the user fee?
7. Is someone readily available to answer questions?

You can also talk to buyers of organic commodities and ask them which agencies they prefer. It is recommended that you carefully select a certifying agency, as it is advisable to stay with that agency for many years. Once you've contacted a certifying agency, they will send you a packet containing the standards and an application. Some agencies charge a fee for the packet while others do not.

The Application and Inspection Process

The Organic Farm Plan Questionnaire included in the application packet will require you to provide the past three years of field histories, maps, pest management strategies, soil fertility programs, and harvest and storage plans for your farm. It will also ask you to list all the inputs to your farm – fertilizers, insecticides, and seeds. The questionnaire will take 2-8 hours to complete and is specific to the certifying agency. Questionnaires are approximately 15 pages in length. When recertifying in subsequent years the process will go more quickly. Once the certifying agency has received your application, they will review your answers and any supporting documentation to make sure it is complete. When all documents have been reviewed, the certifier will pass the application materials to an independent accredited inspector who will conduct a site inspection. The fee for this inspection is paid by the producer and covers the cost of the inspection report and the inspector's travel expenses. The on-site visit will take two to four hours depending on the size of your farm, and will be scheduled when a knowledgeable representative of the farm will be present.

The inspector will verify that the information on the application questionnaire is correct. They will also want to walk through the fields you are requesting to be certified. Here they will look at the borders to make sure that there is a suitable distance between organic crops and conventionally managed land to prevent pesticide drift or overspray from contaminating your crop. Farmers are encouraged to leave a 25-foot grass barrier around their organic fields. You will also be asked specific questions about your weed control strategies, pest management practices, and fertility program. The inspector will want to know what your long-term soil building plans are to assure you are taking a whole-farm

The inspector will ask questions about your weed control strategies; here black plastic controls weeds around tomatoes and peppers

approach to crop production. Any documentation you can provide in this area will be beneficial to your application. Field histories, weekly notebooks, storage records, input records, and sales records are all important when you are pursuing organic certification. You will also be asked to estimate the yield and value of the crop.

After the site visit, the inspector sends the file with their report and any additional documentation collected at the visit such as fertilizer tags or seed receipts, along with a bill to the certifying agency. After reviewing your file, a committee within the certifying agency will decide whether your farm meets the necessary criteria to become certified with their agency. There will be one of four outcomes: approval for certification, a request for additional information, notification of noncompliance, or denial of certification.

The inspector will charge a flat fee for the inspection and writing the report, with an additional charge for any travel expenses incurred.

Notice of Noncompliance and Denial of Certification

If a certifying agent finds reason that the applicant is not in compliance with the Organic Standards, they will issue a written notification of noncompliance to the applicant. It means that an applicant will be certified if certain changes are made. The notice of noncompliance will include a description of the violation as well as a date by which a correction must be completed and what documentation is necessary to support the correction. A follow-up site visit may be necessary to assure the correction has been made. If an applicant doesn't comply or fails to respond, a denial of certification will be issued. Similarly, if a correction is not possible, a denial of certification will be issued. Applicants who receive a notice of noncompliance or a denial of certification can apply for certification with another agency. In situations where a minor noncompliance was observed, certification may be granted with the stipulation that the violation must be corrected within a specified time period.

Certified organic growers provide an extensive paper trail to prove products and practices comply with requirements

Recordkeeping

Organic certification requires an extensive paper audit trail to prove that the products and practices used comply with the certification requirements. The tracking documentation required of an organic producer is part of

the quality system that leads the consumer to pay a premium for this distinctive product. Many of the items listed below can be combined in one document; for example, field activities, inputs, monitoring, seed planting, and harvest information could be documented either by year or by field on one document. Some of the documentation needed includes the following:

- Three-year crop history with all inputs, green manures, etc.
- Detailed map of field locations and identifying number
- Documentation of previous land use
- Current proposed production by field
- Detailed map of adjoining land use areas
- Neighboring land use affidavit if a 25-foot buffer strip is absent
- Map of farmstead illustrating storage locations
- Proof of organic seed or documentation of the attempt to obtain organic seed
- Non-GMO affidavits for all purchased seed that is not certified organic
- Soil test results as justification for use of minerals/approved fertilizers
- Complete ingredient listing for all blended fertilizers
- Residue analyses of all inputs such as off-farm manure
- Invoices or tags verifying purchase of inputs
- Calendar, field history sheet or field activity book
- Detailed records of all input applications including date, rate and location
- Monitoring records including soil, tissue, and water tests as well as observational monitoring records
- Details of what seed is planted in which field
- Date and location of tillage, cultivation and pest control activities
- Date, location and yields of harvest
- On-farm cleaning affidavits when equipment and storage were also used for conventional crops
- Storage records including location, identification, amount and cleaning activities for storage facilities
- Sales of organic produce from storage or field
- Shipping records including scale ticket, dump station ticket or bill of lading
- Processing license if the product was processed after harvest
- Transaction certificates

If you are not currently keeping records or your recordkeeping system consists of paper scraps in a shoebox, you may wish to organize your files prior to meeting with an inspector so you can locate the necessary items quickly and easily.

Continuation of Certification

Once you become certified, you must maintain that certification each year by paying your fees, having an inspection and submitting updated farm plans that detail changes from the previous year. If there were any minor non-compliances identified, a verification of correction should also be submitted. The inspector will conduct another site visit and forward their report along with your updated farm plan to the certifying agency for review.

Organic farming is a rewarding experience that provides the grower with an opportunity to truly become a part of the natural system and work with nature rather than try to control nature.

Frequently Asked Questions

Q: *I want to sell my backyard-grown organic tomatoes to the local health food store and they told me I must be certified. What do I do?*

A: The USDA rule exempts farmers who sell less than $5,000 worth of organic products per year. However, exempted farms still need to follow the organic rule to avoid fines for fraud.

Clover interseeded in died back corn keeps down weeds

Q: *How can I control weeds in the fields I am converting to organic production?*

A: Because synthetic herbicides are not allowed in organic production, many organic farmers plant their crops later than conventional growers. This allows more weed seeds to germinate so they can be mechanically controlled through tillage. Repeated use of aggressive rotary hoeing and/or dragging when the crops are newly planted and still young is important. Weeds are much easier to control when small. Cultivators used by organic farmers include shovel types, disc hillers, Lilliston cultivators, and the Danish tine. Some organic growers will also use flame weeders to control small weeds. Anyone selling their produce as organic should have a copy of the National Organic Standards and keep detailed records as indicated above.

Q: *What types of seeds are allowed for organic production?*

A: Seeds treated with synthetic fungicides and insecticides (captan, thiram, imidacloprid, etc.) are NOT allowed. No GMO seeds are allowed. Organic growers can use seed treated with clay or nitrogen fixing bacteria as long as nothing is genetically modified. All seed must be organic unless you can prove that organic seed is not available. Be sure to keep all documentation from seed purchases for your inspector to review.

Q: *I am growing vegetables organically and want to know what types of fertilizers are approved for use.*

A: Naturally mined minerals such as quarry lime are allowed, but synthetic derivatives such as hydrated lime are not. Your certifier will help you decide what you can and cannot use. Green manures and cover crops are encouraged as part of a nutrient management program in an organic production system.

Beautiful, weed-free vegetable beds are possible in organic systems

Resources

- National Organic Program web site: www.ams.usda.gov/nop
- Organic Trade Association web site: www.ota.com
- Organic Materials Review Institute (OMRI) web site: www.omri.com
- Appropriate Technology Transfer for Rural Areas (ATTRA) web site: www.attra.ncat.org
- Upper Midwest Organic Resource Directory—available from MOSES, web site: www.mosesorganic.org
- Midwest Organic Services Association web site: mosaorganic.org
- Organic Crop Improvement Association web site: www.ocia.org
- Wisconsin Department of Agriculture, Trade and Consumer Protection marketing/value added web site with link to organic page: http://www.datcp.state.wi.us/mktg/business/marketing/val-add/