

Certification Process for Organic Production

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Organic Farming and Related NebGuides for Nebraska

This publication is part of a NebGuide series on organic farming being developed by University of Nebraska–Lincoln Extension. As the publications are completed, they will be available on the UNL Extension Publications website. Go to extension.unl.edu/publications and enter the title into the search box, or contact your local extension office.

- University of Nebraska–Lincoln Organic Farming Research
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- Developing a Farm Organic System Plan
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- Selecting Winter Wheat Cultivars for Organic Production
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To sell agricultural products labeled as organic in the United States, farmers and processors must follow the regulations of the United States Department of Agriculture’s National Organic Program (NOP). Organic production is a federally regulated program of the USDA Agricultural

Marketing Service to assure consumers that the integrity of the organic product has been maintained throughout all of the production and marketing processes, and that these operations were inspected by a neutral third party.

The process to certify organic requires the land to go through a 36-month transition during which no prohibited substances, as listed in the NOP regulations (NOP §205.600-§205.607), are applied. Expired Conservation Reserve Program (CRP) land may qualify immediately for organic production provided the owner can produce an affidavit stating that no prohibited substances on the NOP list were used. At the start of the transition period, it is recommended that farmers

select and work with a certifying agency. (For a detailed list of Accredited Certifying Agents, go to www.ams.usda.gov/AMSv1.0/nop). Certifying agents are responsible for providing farmers information on the NOP organic production standards for producing organic products by following their individual Organic System Plan (OSP). Certifying agents will inform farmers about the organic certification process and provide a third-party inspector. Certifying agents are not allowed to directly provide technical information to farmers and are not organic production consultants or marketing agents.

To apply for certification, the farmer will develop a detailed OSP for their operation, outlining cultural practices, crop rotations, soil fertility and pest control strategies, planned input usage, and a record keeping system. Considerations during the transition to an organic farming system are the increase in labor required to control weeds, the desirability of monitoring fields on a daily basis, and marketing. During the transition period, crops cannot be sold as organic but may qualify as natural products or be sold in non-GMO markets.

Organic farmers must learn to approach agricultural production in a different manner. For example, farmers need to be more aware of the natural world to monitor for and control pests. To increase soil fertility and organic matter, farmers must use crop rotations, green manure, livestock manure, or plant matter (see NOP standards §205.203 on plant and animal manure and §205.601 for the National List of allowed and

prohibited substances). Farmers must learn to balance profit as well as practice environmental stewardship. Because there is no single recommended cultural practice to follow, farmers must develop a system that fits their ecoregion, the amount of available labor, and their own economic goals. Organic farming is considered a continual learning process.

Farmers may contact the University of Nebraska–Lincoln Organic Working Group for advice and help to locate an organic mentor to provide cultural practice information on crops within their ecoregion. Some certifying agents also can provide ecoregional organic mentoring through their own farmer groups.

Organic Farm Certification Process

Farmers must read and be familiar with the USDA’s NOP production standards (NOP §205.200) and all regulations relevant to organic farming. For these and the current National List of allowed substances for organic production (NOP §205.601), go to: www.ams.usda.gov/AMSv1.0/nop.

Organic standards can be confusing to the beginner; however, a basic understanding of the requirements is essential to maintain the integrity of organic products being sold. Farmers must also select a certifying agent and submit to a third-party inspection process as outlined in the NOP.

NOP requirements for certification:

Subpart E — Certification

§ 205.400 General requirements for certification

§ 205.401 Application for certification

§ 205.402 Review of application

§ 205.403 On-site inspections

§ 205.404 Granting certification

§ 205.405 Denial of certification

§ 205.406 Continuation of certification

The organic production standards (NOP §205.1-§205.699) are generalized to apply across the entire U.S. Actual conditions in a given ecoregion require localized management practices that are not specified within the standards. Organic farmers in each ecoregion establish local strategies within the requirements specified by the NOP standards. Nebraska has four distinct ecoregions — Western High Plains, Central Great Plains, Nebraska Sandhills, and Western Corn Belt. The UNL CropWatch website (cropwatch.unl.edu), in its Organic section, has current information on cultural practices being used in Nebraska by organic farmers.

An individual farm organic system plan (NOP §205.201) is required and must be approved by the operation’s certifying agent prior to certification. Record keeping requirements for certification include:

- documentation of prior land use,
- field histories,

- maps,
- organic seed searches (for cash crops, green manures, and cover crop seeds),
- non-GMO statements,
- all inputs,
- location and maintenance of buffer strips,
- equipment clean-out,
- bin registers,
- farm sales, and
- field activity logs.

Other records may be required depending on the operation and certifying agent. The required documentation helps farmers track their operation and provides a record of integrity for inspectors, certifying agents, and consumers.

Other countries, such as Canada, Japan, and several European countries, enforce their own organic standards, which may differ from, and are in addition to, the NOP standards. To market products internationally, farmers must also meet the requirements for the respective program(s) as verified by inspection and certification according to each unique set of organic standards.

The Organic Farm Inspection

After the required farm OSP and documentation are submitted along with applicable fees to the certifying agent, the operation’s file is reviewed. If additional records or documents are needed, the certifying agent will notify the farmer. Once the operation’s file is complete and demonstrates the farmer’s ability to comply with organic standards, the certifying agent will assign an organic inspector, who will schedule the on-site inspection. The owner or an authorized and knowledgeable representative of the operation must be present during the inspection.

The inspector’s role is to act as a neutral party to observe the organic operation and to report findings to the certifying agent. The inspection will verify that the organic system plan accurately reflects the practices used, and that prohibited substances have or have not been applied. An inspector is not allowed to act as an advisor or consultant, but can answer questions about the organic standards. Inspectors are bound by confidentiality agreements not to discuss an operation with any other party except the certifying agent, nor to divulge proprietary information.

During the inspection, the inspector will review the OSP and records and look at all fields, buffers, equipment, and storage areas. Mixed organic and nonorganic operations are of particular concern to inspectors. They will need to see that systems are in place to prevent contamination and co-mingling of crops, materials, equipment, and storage. Operations should prepare for inspection by making sure all paperwork (field maps, records, labels, sales receipts, etc.) is up to date and easily accessible. Audits are usually conducted to trace the sale

of products back to the specific field where they were grown, and to determine if yields are appropriate. The importance of records and receipts cannot be overstated. For examples of an organic farm audit trail, go to the UNL CropWatch website (cropwatch.unl.edu) Organic section.

Following the inspection, the inspector will review significant findings with the farmer during an exit interview to explain any potential compliance issues from the relevant section of the standards. At this time, the farmers must ensure the inspector has all facts correct. Later, the inspector will write a detailed report with his or her findings to present to the certifying agent. The farmer will receive a copy of the report from his/her certifying agency, and should review it in order to clarify any misunderstandings and provide more information if needed. The certifying agent reviews the entire file again to determine compliance with the applicable organic production standards.

The certifying agent's role is to consistently determine each farm's compliance with the organic standards. If the operation is in compliance, a certificate of organic certification is issued to that farm. If the operation is not in compliance, certification denial may be in order, but usually a notice is sent with a letter of the requirements that must be corrected within a determined time frame. Once a farm is granted an organic certificate, products produced under the OSP may be marketed and labeled as "organic." Annually, the certified organic operation must update its OSP, pay the associated fees to the certifying agent, and undergo another inspection. Additional inspections may be required under certain conditions, and all organic operations are subject to unannounced inspections.

UNL Organic Resources

The UNL Institute of Agriculture and Natural Resources states in its strategic plan a commitment to "sustainable food, fiber, and natural resource systems that support a bio-based economy" and "economics and environments for a sustainable future." To help meet these commitments, district agricultural research centers in Nebraska's bioregions have a diversified portfolio of experiments, including research on organic-certified land. Some field activities are funded by grants from the USDA Integrated Organic Program.

The UNL Organic Working Group provides information on organic crop research at four agricultural field laboratory locations across the state, and crop breeding for small grains suitable for organic systems, as well as studies in antioxidant properties of organic small grains. The Healthy Farm Index, a research-based tool to assess and communicate the value of biodiversity and ecosystem services, is available at hfi.unl.edu.

[edu/hfi.shtml](http://hfi.unl.edu/hfi.shtml). Flame weeding research information, describing an alternative tool for weed management in agronomic crops, is available at cropwatch.unl.edu.

Additional organic farming information resources:

University of Nebraska–Lincoln Organic Working Group research: organic.unl.edu/

University of Nebraska–Lincoln Sustainable Agriculture: sustainableag.unl.edu

University of Nebraska–Lincoln Organic Farming 2010 publication: sustainableag.unl.edu/pdf/OrganicFarming2010.pdf

Nebraska Sustainable Agriculture Society: nebsusag.org/

University of Nebraska–Lincoln Center for Applied Rural Innovation organic agriculture: sustainableag.unl.edu

University of Nebraska–Lincoln Healthy Farm Index: hfi.unl.edu/hfi.shtml

Midwest Organic and Sustainable Education Service (MOSES): mosesorganic.org

National Sustainable Agriculture Information Service (ATTRA): attra.ncat.org

Rodale Institute: rodaleinstitute.org

For more information:

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**Index: Crop Production/Field Crops
Cropping Practices**

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