

Organic Without Certification
Great Plains Vegetable Growers Conference
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UNIVERSITY OF MISSOURI
Extension

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Agenda

- ▶ The Publication
 - Terminology
 - Certified versus Non-Certified
 - On the Farm
 - At the Market
 - Direct and Non-Direct
 - Paperwork Requirements
- ▶ Questions

Small Scale Organics:
A Guidebook for the Non-certified Organic Grower
(Includes Guidelines and an Organic System Plan)

By George Knepper

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Terminology

- ▶ National Organic Program (NOP)
 - Exists under the USDA-AMS
- ▶ National Organic Standards Board (NOSB)
 - Civilian panel that advises the NOP
- ▶ National Organic Standard
 - aka - National Organic Program Regulations, USDA Organic Regulations, Final Rule of the National Organic Program, etc.
- ▶ Certified Organic
 - Refers to land with a submitted farm plan, compliant with the National Organic Standard, and certified by a USDA-accredited certifier (annually).
- ▶ Non-Certified Organic
 - Refers to land with a farm plan, compliant with the National Organic Standard, but not certified by a USDA-accredited certifier (does not exceed \$5,000 in sales).

Certified vs. Non-Certified

- ▶ Certified and non-certified organic farming are virtually the same.
 - Differences
 - Third party audit
 - Farm plan submission
 - Certificate
 - Sales volume

Certified and Non-Certified

- ▶ On the Farm:
 - Both must conform to the National Organic Standard
 - Includes:
 - Land Requirements, Growing Practices, Fertilizers & Soil Amendments, Manure and Compost, Pesticides, Seeds and Planting Stock, Preventing Contamination, Marketing Information/Signage, Organic Labeling, Avoiding Commingling, Record Keeping, etc.

Land Requirements

- ▶ Land that can produce organic crops must not have been treated with substances prohibited by the standard for the previous 36 months

Growing Practices

- ▶ Overall theme of building the soil and the soil environment:
 - Cover Crops, Organic Matter, Mulching, Composting, Trapping,
 - Crop Rotation is specifically required

Fertilizers and Soil Amendments

Natural organic materials and crushed rock minerals are allowed



Read the label for ingredients

Manure and Compost

- ▶ Manure:
 - Composted
 - Unrestricted as long as guidelines are followed
 - Uncomposted
 - 90/120 day rule
- ▶ Compost:
 - Unrestricted use
- ▶ Commercial Heat-Treated Manure
 - Unrestricted use
- ▶ Manure Tea, Compost Tea
 - 90/120 day rule
- ▶ Worm-Composted Manure, Dried Manure, Guano
 - 90/120 day rule

Pesticides

- ▶ Prevention is key
- ▶ Classes of allowed pesticides:
 - Biopesticides, botanical materials, minerals, superior spray oils, hydrogen peroxide and insecticidal soap



Seeds and Planting Stock

- ▶ Not Allowed
 - Seeds coated with prohibited substances
 - Genetically engineered varieties
 - Conventionally grown transplants
- ▶ Concessions can be made

Certified and Non-Certified

- ▶ At Market
 - Items marketed as organic must truly be so
 - Items marketed as certified organic must truly be so
 - Non-Certified Organic products cannot use:
 - The words "Certified Organic"
 - The USDA Organic Seal (reserved for use by certified organic operations)



13

Non-Certified

- ▶ Direct - Unrestricted (sort of)
- ▶ Non-Direct:
 - Can be sold for resale as long as the reseller does not sell it as certified organic
 - Cannot be sold for inclusion in organic products

Non-Certified: At Market 14

Paperwork

- ▶ Both Certified and Non-Certified Operations:
 - Develop an Organic System Plan (reviewed and updated annually)
 - Maintain adequate records of transactions and activities to show that the plan is being followed and that the operation is in compliance with the National Organic Standard

15

Help with Paperwork

- ▶ Organic System Plan
 - The Small Scale Organics: A Guidebook for the Non-Certified Organic Grower publication contains an appropriate (condensed) OSP and annual update form

16

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(Version 1.0) **ORGANIC SYSTEM PLAN (OSP) & DECLARATION FOR NON-CERTIFIED SMALL FARMS**

Year to Which this Plan Applies _____

Identification
Name _____ Farm/Garden Name _____

Mailing Address _____

Physical Address (if different than mailing address) _____

Phone _____ Cell _____
Email _____ Fax _____

General Information

All my organic production will be done at the physical address shown above

I will grow my organic crops at the following location(s): _____

I will sell less than \$5,000 of organic products in this calendar year.

IF YOUR SALES WILL EXCEED \$5,000, YOU MUST APPLY FOR CERTIFICATION.

The land from which I will harvest any for-sale organic products has had no applications of prohibited fertilizers, pesticides, or other materials in the 12 months prior to harvest.

The products I expect to sell as organic within the calendar year include:

- Produce, herbs and/or cut flowers
- Plants and/or transplants
- Edible sprouts
- Processed products (flour, jams, jellies, syrups, breads, cakes, etc.)
- Other: If "other," please describe: _____

17

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(Version 1.0) **OSP ANNUAL UPDATE (ATTACH TO ORIGINAL ORGANIC SYSTEM PLAN (OSP) & AFFIDAVIT FOR NON-CERTIFIED SMALL FARMS)**

Year to Which this Plan Applies _____

Identification
Name _____ Farm/Garden Name _____

My contact information remains the same as previously noted.

I have noted changes in my contact information below

Mailing Address _____

Physical Address (if different than mailing address) _____

Phone _____ Cell _____
Email _____ Fax _____

General Information

The location(s) I use for growing organic crops remain the same as last year.

IF YOUR FIELD OR GARDEN LOCATION(S) HAS CHANGED, PLEASE COMPLETE A NEW ORGANIC SYSTEM PLAN (OSP) & DECLARATION.

I am selling less than \$5,000 of organic products in this calendar year.

The land from which I harvest any for-sale organic products has had no applications of prohibited fertilizers, pesticides, or other materials in the previous 12 months.

I am selling the same kinds of organic products this coming year as I have in the previous year.

IF YOU ARE ADDING A NEW CLASS OF PRODUCTS FOR ORGANIC SALE, PLEASE COMPLETE A NEW ORGANIC SYSTEM PLAN (OSP) & DECLARATION.

18

Help with Paperwork

- ▶ Record Keeping
 - The publication also has some condensed logs to help with record keeping
 - ATTRA has a more complete set of these logs
 - <http://www.attra.ncat.org/attra-pub/PDF/marketforms.pdf>

19

Organic Market Farm Documentation Forms

"Market Farm" is the term we use for commercial organic "market gardens" and "truck farms."

The Purpose and Use of These Forms

In order to become certified organic, market farmers must demonstrate to an accredited certifier that their operations comply with National Organic Program regulations. This process is begun by completing an Organic System Plan (OSP)—normally part of the application for certification. The OSP illustrates how the producer plans to comply with the regulations by detailing the practices, inputs, and monitoring procedures that will be used. The Organic System Plan is locked up by: on-site inspection, in fact, farming in the manner outlined in the OSP. It is the inspector's responsibility to look for documentation and indicators that substantiate the producer's claim to organic status, as well as look for any violations.

The forms in this package are tools that farmers can use to document practices, inputs, and activities that demonstrate NOP compliance. The forms can be kept anywhere to make recording easy, such as the tool shed, packing shed, or farm office.

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Aerial shot of small farms with orchards, crops and windbreaks.
Photos by Holly Born. Courtesy of NRECS-USDA.

<http://www.attra.ncat.org/attra-pub/PDF/marketforms.pdf>

20

Thank You

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Questions?

21