



Certification Basics

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AGENDA

1. The Federal Rule
2. Accredited Certifiers
3. CCOF
4. The Organic System Plan
5. Certification tips



Organic Regulations

- October 21, 2002- full implementation of the National Organic Program (NOP).
- 7 CFR Part 205
- “level playing field”
- Federal enforcement of organic regulation.
- Certification required for use of “organic”
- Certification allows use of USDA or Certifier seal.



What Has to Be Certified?

- Front panel organic claims (mostly on processed products)
 - 100% Organic, Organic, Made With Organic...
- Use of “Certified Organic” in retail signage
- Use of certifier or USDA seal
- >\$5000 in annual organic sales
- Ingredients must be certified

What is Organic?

More Than Input Substitution!

The regulatory definition,
National Organic Program, Section 205.2
Organic production:

“responds to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.”

- Large and small farms
- Same standards different scales.



Certifier's Role in Organic

- All products sold as “organic” in US must be certified by a USDA accredited certifier
 - Exception for <\$5,000/year and retail stores/brokers.
- Agents of USDA - Issues federal license to client
- Must maintain accreditation with US and Foreign bodies for certification recognition in various markets
- Certifiers are no longer standards setting bodies
 - National Organic Program and National Organic Standards Board
- Certifiers may have trade associations or political roles

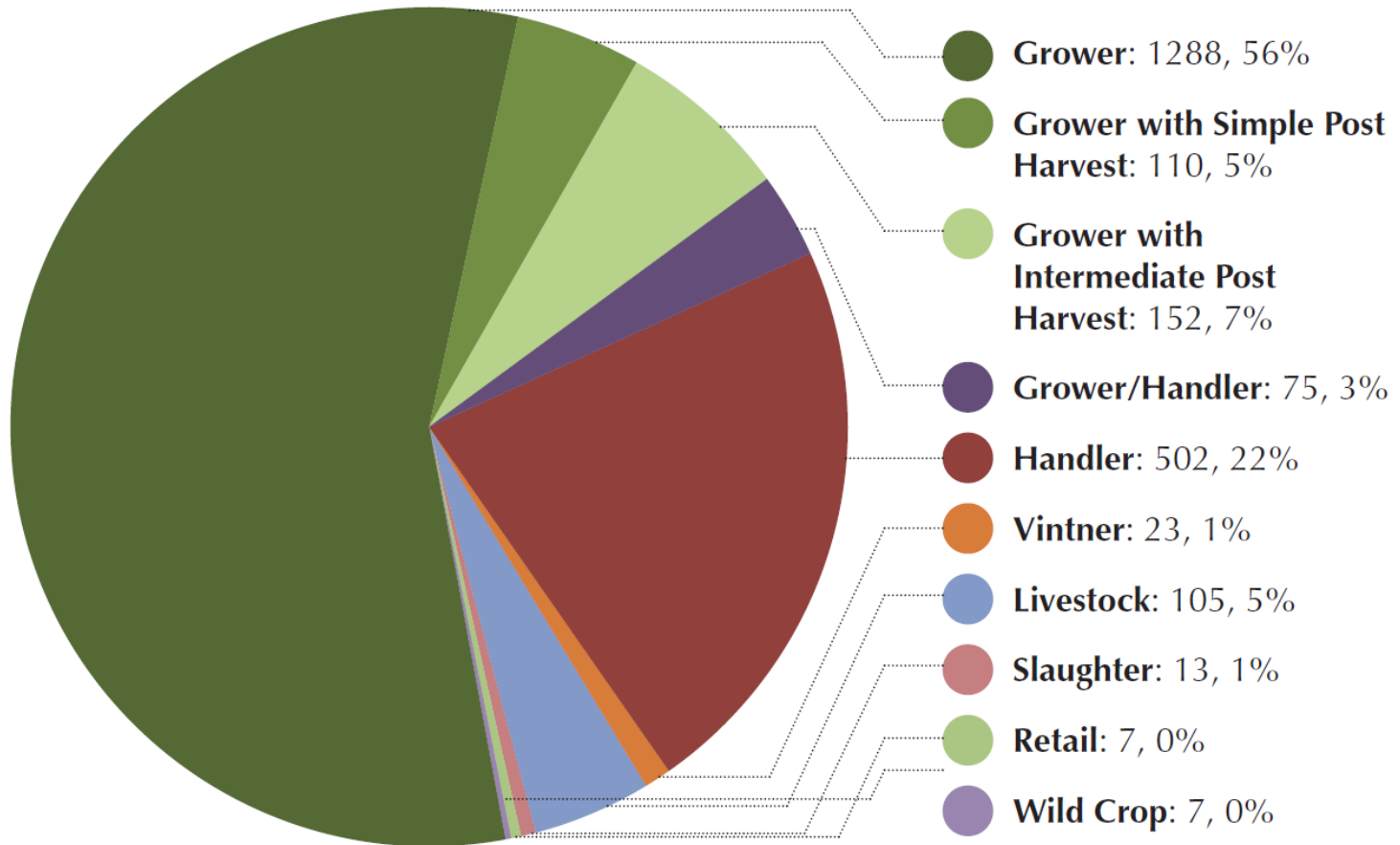
How Do Certifiers Differ?

- Non-profit vs. for profit.
- Area of expertise/service
 - Regional/national/international.
 - Particular crops or process specialty.
 - Service niche.
- Cost and fee structure -per acre or sales volume etc.
- Differing accreditations/market access.
- Level of activism, market promotion, and education.
- We all love acronyms!

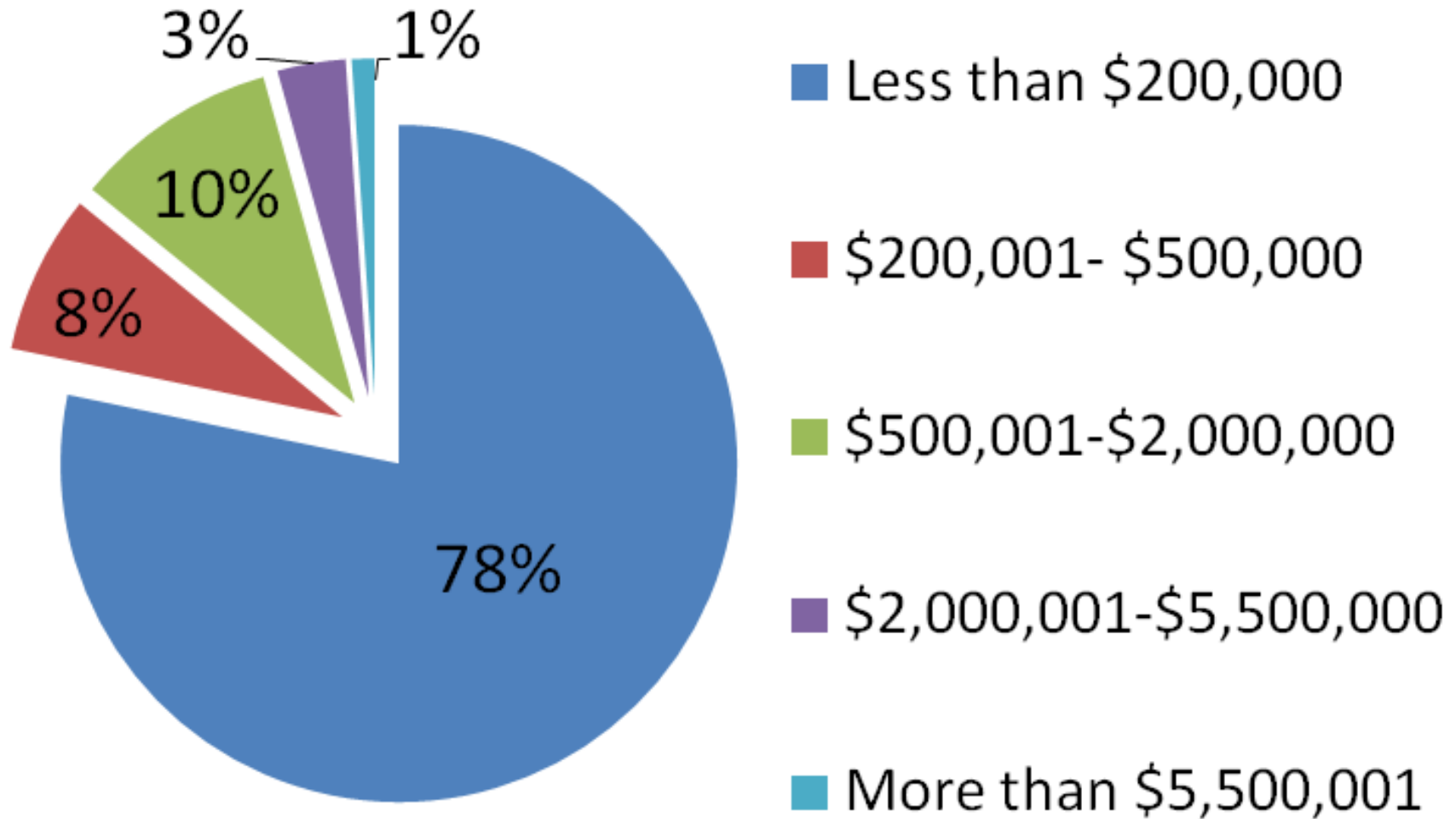
Who is CCOF?

- Nonprofit organic certification and trade association since 1973
 - Organic Certification
 - Trade Association - education, promotion, marketing & PR support
 - Political Advocacy
- Certification throughout North America for producers, processors, private labelers, brokers and retailers.
- More than 1,700 growers, 100 livestock producers, 500 processors, including more than 1,000 certified product categories
- Currently certify more than 75% of California's organic acreage (>500,000 acres) and 11% of U.S. certified organic businesses
- More than 35 years of organic certification experience, fully accredited by USDA, and one of the oldest and largest certifiers in North America

2010 Client Distribution by Scope



2010 Client Distribution by Gross Organic Production Value



How much is this going to cost? CCOF Certification Fees

- **Application Fee \$275** – Due with first year application only.
- **Inspection Costs** – Billed on a time and materials basis upon completion of the inspection. Farm inspections typically range \$250-\$500.
- **Annual Certification Cost** – These costs are based on the **Gross Organic Production Value (GOPV)** of the CCOF certified products. For example:

| | |
|-------------------------------|------------------------|
| <10K all organic = \$200 | 50+ to 100K = \$525 |
| 10 to 20K all organic = \$275 | 100+ to 200K = \$600 |
| 20 to 50K = \$350 | 200+ to 300K = \$725 + |

(Farm GOPV is calculated as all farm gate organic value)
- **Processors (handlers)** deduct the “Cost of Organic Goods” from “Gross Organic Sales” to arrive at their fee category.
- **Additional Services** – CCOF charges modest fees for additional services such as international standards verification, additional processing facilities, mid year additions of acreage or processed products, and completion of export documents.

Certification Process Overview

1. Application
 - Organic System Plan (OSP)
2. Review of application
3. Inspection
4. Review of inspection report
5. Conditions and resolution
6. Certificate Issued- Federal License!
 - Valid until withdrawn by applicant , suspended or revoked by NOP.
7. Annual Inspection & Renewal

Organic System Plan (OSP)

- A description of practices
- Operators describe their practices in order to show that they meet the standards
- An agreed upon contract between applicant and certifier...
- Should be updated as practices change (a *living* document)
- Certifier/inspector verifies:
 - 1: OSP describes a system compliant to NOP
 - 2: Operation is functioning as described in OSP

Annual Inspection

What the inspector will cover and verify:

- ReviewOSP - Observe Practices- Verify Records
 - Parcel and facility tour, how organic crops & products are separated from non-organic
 - All records pertaining to the organic productions & practices
 - Basic regulatory understanding
 - Audit trail (recall/tracking system), In-out Balance
- Exit Interview

NOP Rule: SubPart C: Organic Production and Handling Standards

- 205.201 Organic System Plan
- 205.202 Land Requirement
- 205.203 Soil and Crop Nutrient Practices
- 205.204 Seeds and planting stock
- 205.205 Crop Rotation
- 205.206 Pest Management



205.202 : Land Requirements



- No prohibited substances 3 Years prior to harvest
- Distinct defined boundaries and buffer zones

Establishing Land History (G2.0)

- Document 3 years of Land History
 - letter from previous landowner or manager
(Personal land history)
 - letter from county verifying “clean” use permit history (3rd party land history)
- Submit 3rd party and/or hand drawn maps showing neighboring land use

205.204 Seeds and planting stock (G3.0)



- Seeds must be organic, unless equivalent organic seed variety is not commercially available—Untreated, non-organic seed.
- Annual transplants *must* be certified organic.
- Perennial stock: One year organic management unless grown annual

205.203 Soil and Crop Nutrient Practices: Highlights (G4.0)

- Maintain or improve the physical, chemical, and biological condition of the soil and minimize soil erosion
- Manage crop nutrients and soil fertility through rotations, cover crops, and application of plant and animal materials.
- Raw Manure: pre-harvest intervals
- Compost requirements

Cover Cropping, green manures, etc...



205.206 Pest Management Highlights (G5.0 and 5.1)

- **First:** Preventative Practices and Best Management Practices, such as...
 - Cultural
 - Biological
 - Mechanical methods
- **Second:** Application of Allowed Materials

Preventative Practices:

- **Cultural Practices:** Timing of planting, Crop Rotation, Companion Planting, Sanitation, Soil Health
- **Biological Controls:** Beneficial Animals & Insects, Beneficial Microorganisms, Attractant or repellent crops
- **Mechanical Controls:** Baits, Traps & Lures, Hand-removal, Bug Vac, Pruning, Mowing, Row covers.

Basic IPM methodology

Materials and the National List

Subpart G:

- 205.600 Evaluation Criteria
- 205.601 Synthetic Substances Allowed for Use in Organic Crop Production
- 205.602 Non-Synthetic Substances Prohibited for Use

Synthetic vs. Non-synthetic

- **Non-Synthetic (natural)**- a substance that is derived from mineral, plant, or animal matter and does not undergo a synthetic process as defined in section 6502(21) of the Act (7 U.S.C. 6502(21)).
- **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.

Examples for crops

§§205.601 & 205.602

- Nonsynthetics (prohibited): lead sulfate, tobacco dust, and strychnine
- Synthetics (allowed): copper sulfate, soluble seaweed extract, elemental sulfur
- Confusing: Chilean nitrate (mined mineral high in soluble nitrogen) is prohibited, unless it is used for “no more than 20% of the crop's total nitrogen requirement”

CCOF Input Material List (G5.1)

- Verify compliance of inputs *before* applying them.
- Your list is your “toolbox”
- Keep record of application dates, locations and amount
- Keep all labels and receipts!
- Don't overlook seed treatments and inoculants

CCOF Input Material Approval

1. OSP “must include: ... A list of each substance to be used.” – NOP 205.201
 - This means PRIOR to use.
2. CCOF Criteria: (must meet One)
 - a. OMRI
 - b. WSDA
 - c. CCOF -- Material Review Request Form (MRRF)

Materials, OMRI and NOP



The OMRI listing tells CCOF if the brand name is made of allowed materials.

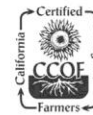
| OMRI Brand Name Products List, web edition | | Crop Production Products |
|--|----------------------------|--------------------------|
| GENERIC CATEGORY | Sorted by Generic Category | OMRI Status |
| ADJUVANTS - FOR PESTICIDE USE | | R |
| Green Valley Natural Plant Wash (WTB Technology) | | |
| Green Valley™ Ultra Guard Plant Wash (WTB Technology) | | |
| Nu-Film 17® (Miller Chemical & Fertilizer Corp.) | | |
| Nu-Film P® (Miller Chemical & Fertilizer Corp.) | | |
| Nu-Lure® Insect Bait5 (Miller Chemical & Fertilizer Corp.) | | |
| Phyto-Plus™ Plant Stimulator (Baicor, LLC) | | |
| Profilm 60 (Perusa Enterprises) | | |
| ThermX™15P (American Extracts) | | |
| Tri-Fol® (Wilbur-Ellis Company) | | |

- **Generic Listing (On National List)**
- **Brand Name (Actives and inerts reviewed.)**
- **Restrictions (Cross reference to Generic List.)**

www.omri.org

Materials Not on OMRI or WSDA Lists

- CCOF reviews materials for clients for free.
 - Material Review Request Form
 - Available at www.ccof.org/forms.php



CCOF
Certification Services, LLC

Materials Review Request Form

It is your responsibility to verify all input materials are allowed before you use them. Materials that have been approved for use can be found on the Products List published by the Organic Materials Review Institute (OMRI), www.omri.org, or Washington State Dept. of Ag (WSDA), www.agr.wa.gov/FoodAnimal/Organic/MaterialsLists.htm. For materials not on either of these lists, CCOF will review the material for CCOF clients on a case by case basis to determine compliance with National Organic Program and international standards.

A. INSTRUCTIONS

If you wish to use a material NOT on either the OMRI or WSDA brand name products lists, please follow these instructions:

1. Complete a separate form for each product.
2. Complete the product information (Section B) below.
3. Attach at least one of the following:
 - A copy of the label showing 100% of all ingredients;
 - Or, a copy of the MSDS (Material Safety Data Sheet). Only adequate if 100% of ingredients disclosed;
 - Or, a current statement from the manufacturer including a complete ingredient list. Only adequate if 100% of ingredients disclosed;
4. For all "inert" or "other" ingredients shown on product label or MSDS provide:
 - A statement from the manufacturer that either discloses all inerts, or states which EPA list of inert ingredients they are on.
5. Fax or mail this form with all attachments to CCOF. CCOF will notify you of the results.

B. PRODUCT INFORMATION

| | |
|------------------------|-----------------------------------|
| Date: | CCOF operation requesting review: |
| Material manufacturer: | Name and formulation of product: |

C. FOR CCOF USE ONLY:

- Client named above may use this product with no restrictions.
 - Client named above may use this product with the restrictions listed below.
 - Insufficient information to determine compliance. Client named above must cease and desist use.
 - Above material is **prohibited**, use of this product will constitute a non-compliance.
- Restrictions:** NOP BEC 20/9291 (EU) IFOAM USDA/MAFF (Japan)

Reviewer:

Date:

CCOF has reviewed this material for use by the client named above based on the information provided. This document does not allow nor encourage the commercial use of CCOF's name or seal in association with this material, nor does it imply endorsement of the material or manufacturer.
CS-A-10, V1, R1 3/15/06

OSP G6.0: Production

- Critical for **identifying risk** and control measures to avoid:
 - GMOs
 - Pesticide drift
 - Neighboring land use issues
- If crops are grown in a buffer, they may not be sold as organic
- Other safeguards such as neighbor notification, signage etc. are recommended
- Treated lumber prohibited for new installations
 - Existing wood can stay

OSP G6.0: Production cont..

- Application equipment cleaning issues must be addressed
 - Must be able to demonstrate that shared fertilizer and/or pesticide equipment is cleaned prior to use in organic –Critical for custom applicators
 - Tractors less of an issue
 - Must be able to document efforts
- Irrigation water
 - Source, contamination concerns
 - Fertigation, shared plumbing
- Storage of prohibited materials on farm
 - Must describe how accidental use is avoided
 - Separate organic and non-organic materials storage is common
 - Signage common
 - Critical for avoiding employee mistakes

OSP G7.0: Labeling

- Retail vs Wholesale
- USDA/ CCOF Logos optional
- “Certified Organic by CCOF” required



OSP G8.0: Recordkeeping

- Must be able to show that you meet the standard.
- Input applications tracked
- Track products back to field.
- Keep record of sales.
- Different scales for different operations.
- Records kept for 5 years

Documentation Tips

- Have certifier approve materials prior to application.
- Ensure application records show specific application locations.
- When in doubt, write it down!
- Don't create records that won't be maintained.
ex. Document organic rinses in work orders, invoices etc.

Documentation Tips

- Have certifier approve materials prior to application.
- Ensure application records and work orders show specific application locations.
- Maintain all documents (audit trail, cleaning logs, compost logs, etc...).
- Don't create records that won't be maintained.
ex. Document organic rinses in work orders, invoices etc.

General Tips



- Be proactive. Know the organic standards, know your OSP, and ensure systems are in place.
- Be careful about materials!
- Make sure fields are signed
 - Protects you, applicators, contractors, delivery people.
- All material labels, receipts for inputs, and records must be available for inspections.
- Organization = cheaper inspections.



Resources:

- **CCOF** - www.ccof.org
(Links to these sites)
- **Organic Materials Review Institute (OMRI)**- www.omri.org
- <http://www.sarep.ucdavis.edu/organic/complianceguide/>
- **WSDA**
<http://agr.wa.gov/FoodAnimal/Organic>
- **National Organic Program**-
www.ams.usda.gov/nop
- **ATTRA** www.attra.org



The screenshot shows the homepage of the California Certified Organic Farmers (CCOF) website. The header features the CCOF logo on the left, the text "California Certified Organic Farmers (CCOF)" in the center, and the tagline "Certification - Public Education - Trade Association" below it. On the right side of the header, there are input fields for "MEMBER ID" and "PASSWORD". A navigation menu on the left lists various sections: About CCOF, Membership, Certification, Directories, Why Organic?, Programs, Government Affairs, Events, Media Room (highlighted), Store, Links, Sitemap, Contact Us, and Home. Below the navigation menu is a search bar. The main content area is divided into several sections: "Welcome to CCOF" with a brief history of the organization; "CCOF Recommends..." with links to CCOF Magazine and Organic Bouquet; "Organic News" with a list of recent news items including "Celebrate Earth Day with CCOF", "CCOF Certified Prather Ranch - a member profile", and "Visiting our Organic Seed Source Directory".





CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy

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