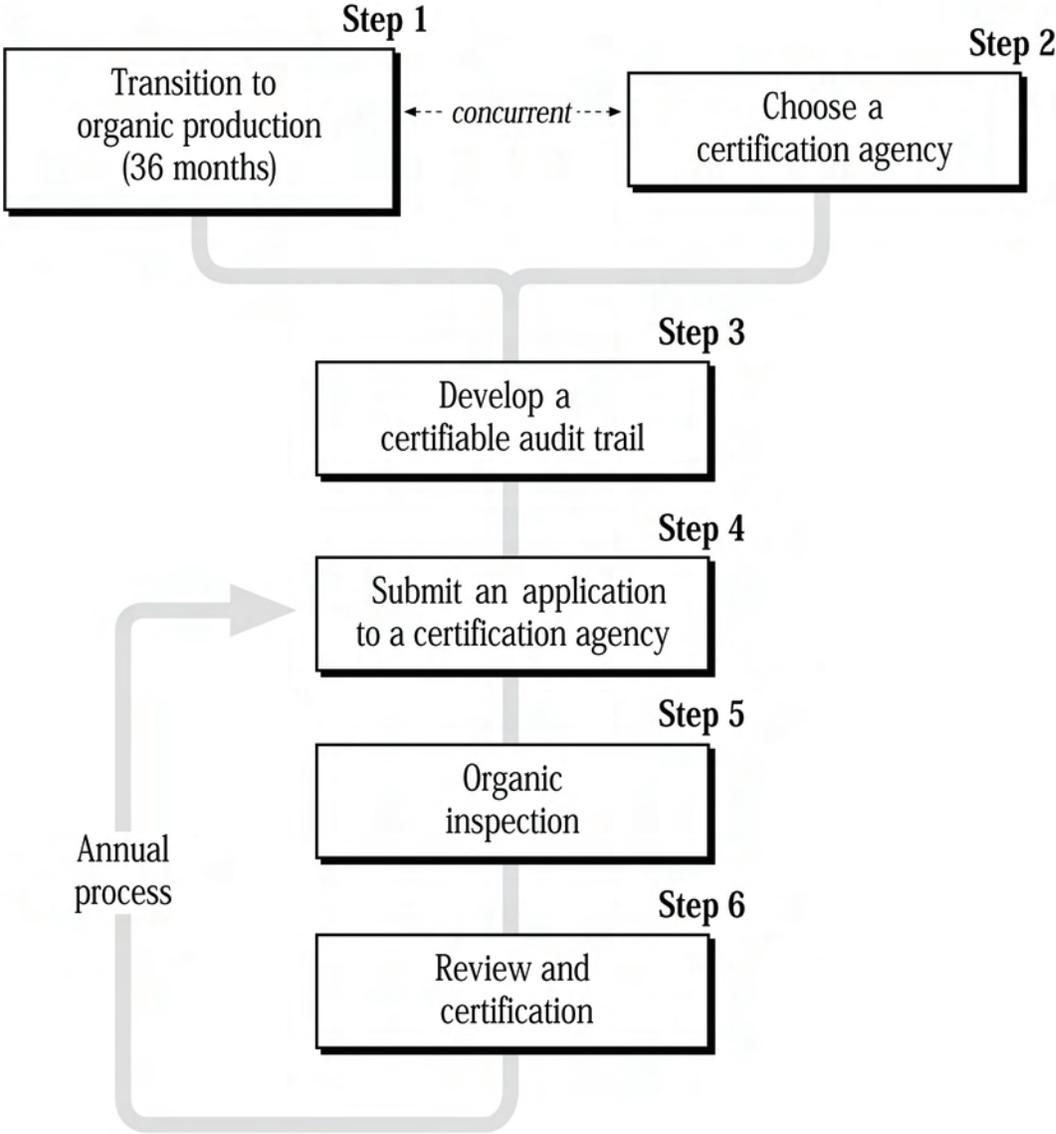


The Organic Certification Process



The Decision: Whether to Become Certified Organic

INTRODUCTION

Producers have heard about many of the potential benefits of organic production, such as

- premium prices for organic products,
- improved soil and water quality associated with diversified cropping systems and reduced use of synthetic chemical inputs,
- reduced handling of potentially hazardous agricultural chemicals, and
- increased profits through reduced use of off-farm (purchased) inputs.

But, what does organic mean? How can a producer participate in the organic market? How does a producer develop a certifiable organic production system? This publication will answer these questions and others as it describes organic certification for Minnesota farmers and processors. The publication includes the following:

.....
Organic certification assures the consumer that products labeled as “organic” were produced and processed according to strict standards established by the USDA.

- 1) answers to commonly asked questions concerning the decision to develop a certified organic cropping system (crops include grains, legumes, forages, fruits, and vegetables);
- 2) an overview of the organic industry;
- 3) a detailed description of the certification process along with usable forms, examples, and tips for navigating through it;
- 4) an overview of certification for organic livestock production and organic on- and off-farm processing; and
- 5) further sources of information.

WHAT DOES “ORGANIC” MEAN?

“Organic” generally refers to a farm production management system that promotes and enhances biodiversity, biological cycles, and soil biological activity to promote healthy crops without the use of synthetic chemicals (meaning synthetic pesticides—herbicides, insecticides, etc.—and synthetic fertilizers).

WHAT DOES “ORGANIC PRODUCTION” MEAN?

Organic production is defined in the National Organic Program (NOP) regulation as “a production system that is managed ... to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.”

WHAT DOES “CERTIFIED” MEAN?

The NOP regulation defines “**certified**” as “a determination made by a certifying agent that a production or handling operation is in compliance with the Act and the regulations in this part, which is documented by a certificate of organic operation.” In other words—you’re following the Rule and have been inspected and approved by a USDA-accredited certifying agent (See NOP Summary in Appendix B.)

WHAT ARE THE BASIC REQUIREMENTS FOR CERTIFICATION?

In simplified terms, the NOP Standards require:

FOR CROP FARMS

- 3 years with no application of prohibited materials (no synthetic fertilizers, pesticides, or GMOs) prior to certification; the National List of Approved and Prohibited Materials, shown in Appendix B, Subpart G, is available at: www.ams.usda.gov/nop/NOP/standards/ListReg.html;
- implementation of an Organic System Plan, with proactive fertility systems; conservation measures; environmentally sound manure, weed, disease, and pest management practices; and soil building crop rotation systems;
- use of natural inputs and/or approved synthetic substances on the National List (see Appendix B);
- no use of prohibited substances while certified;
- no use of genetically engineered organisms, (GMOs) defined in the rule as “excluded methods”;
- no sewage sludge or irradiation;
- use of organic seeds, when commercially available;
- use of organic seedlings for annual crops;
- restrictions on use of raw manure and compost;
- maintenance of buffer zones, depending on risk of contamination; and
- no residues of prohibited substances exceeding 5 percent of the EPA tolerance.

FOR LIVESTOCK OPERATIONS

- implementation of an Organic Livestock Plan;
- mandatory outdoor access;
- access to pasture for ruminants;
- no antibiotics, growth hormones, or GMOs;
- 100 percent organic feed and approved feed supplements;

- organic management from last third of gestation or second day after hatching; and
- no rotating animals between organic and non-organic management.

FOR PROCESSING OPERATIONS

- no commingling or contamination of organic products during processing;
- implementation of an Organic Handling Plan;
- no use of GMOs or irradiation;
- proactive sanitation and facility pest management practices;
- use of organic ingredients in “organic” products, when commercially available; and
- use of approved label claims for “100 percent organic”, “organic” (at least 95 percent organic ingredients), “Made with organic ingredients” (at least 70 percent organic ingredients) and proper use of the word “organic” in ingredient list (less than 70 percent organic ingredients).

WHO MUST BE CERTIFIED TO SELL ORGANIC PRODUCTS?

Under the NOP, all producers and processors, except for retailers and warehouses that do not process products, who sell over \$5,000 per year of organic products must be certified by an accredited certification agency in order to sell their products as “organic.”

WHAT IS ORGANIC CERTIFICATION?

Organic certification was developed as an evaluation system to validate the authenticity of products labeled and sold as organic. It is a process of review and approval of a production system by an organic certification agency, after which a producer is able to call his or her product “organic” or “certified organic.” It seeks to assist the producer in achieving optimal systems that are ecologically and economically sustainable, while assuring the consumer that the product was produced without the use of prohibited materials. Certification must be renewed annually, and is valid until surrendered, suspended, or revoked.

Exemption: Producers who sell less than \$5,000 per year in organic product do not have to be certified but must still follow the rule in order to use the term “organic.” Such exempt producers must not sell their products to be used as organic ingredients by others, unless they choose to be certified.

WHAT “ORGANIC” DOES NOT MEAN

It is a common misconception that “organic” applies to the food itself and assures that the food is residue-free. Although the food product carries the seal of certification, this certification applies to the system that yielded the product, rather than to the product itself.

HOW DO I BECOME CERTIFIED?

The flow diagram on page 4 briefly outlines the steps to organic certification. This publication will address each step in more detail.

WHO CAN CERTIFY?

Only agencies accredited by the USDA can certify. A complete list of accredited certification agencies is available at: <http://www.ams.usda.gov/nop/CertifyingAgents/Accredited.html>.

SHOULD I APPLY FOR CERTIFICATION?

Many producers have explored the possibility of converting their farm operation, or a portion of their farm, to organic production practices. Once the commitment has been made to move away from conventional farming and the use of synthetic chemicals, producers must work with an accredited certifier if they want to market their products as organic.

Table I: USDA-Accredited Organic Certifiers Active in Minnesota

NOTE: This list was accessed from the Minnesota Department of Agriculture (MDA) website in January 2007, and is included for reader convenience. Check the MDA website or contact MDA for updates to the list.

Farms and handlers may contract with ANY USDA-accredited certifier, no matter where its office is located.

This list is prepared and provided by the MDA from information provided by certifiers, and as a convenience to farms and handlers—you may use a certifier not on this list as long as they are USDA-accredited.

CALIFORNIA CERTIFIED ORGANIC FARMERS (CCOF)

Jake Lewin
1115 Mission Street
Santa Cruz CA 95060
831-423-2263 ext. 16
jake@ccof.org

Other certifications and accreditations:
CCOF International

Certificates offered: crops, livestock, handlers/processors

CONTROL UNION CERTIFICATIONS

Johan C. Maris
PO Box 161
Dr. Klinkertweg 28b
8000 AD Zwolle NETHERLANDS
31 38-4260100
certification@controlunion.com
www.controlunion.com

Other certifications and accreditations: EU Organic, JAS Organic, Other non-organic certification programs

Certificates offered: crops, livestock, wild harvest, handlers/processors

CALIFORNIA CROP IMPROVEMENT ASSOCIATION

Robert Simas
Parsons Seed Certification Center
One Shields Way, U of CA-Davis
Davis CA 95616-8541
530-752-0544
fax: 530-752-4735
www.ccia.ucdavis.edu

Other certifications and accreditations:
AOSCA Identity Preservation Certification

Certificates offered: handlers/processors

GLOBAL ORGANIC ALLIANCE, INC.

Betty Kananen
PO Box 530
3185 Township Rd 179
Bellefontaine OH 43311-0530
937-593-1232
kananen@logan.net www.goa-online.org

Other certifications and accreditations: EU, MAFP/USDA

Certificates offered: crops, livestock, wild harvest, handlers/processors

INDIANA CERTIFIED ORGANIC. INC.

Cissy Bowman

8364 S SR 39

Clayton IN 46118

317-539-4317

cvof@iquest.net

Cell phone: 317-902-6743

Other certifications and accreditations:
ISO 65

Certificates offered: crops, livestock, wild
harvest, handlers/processors

**MIDWEST ORGANIC SERVICES
ASSOCIATION, INC.**

Stephen Walker

PO Box 821

122 West Jefferson St

Viroqua WI 54665

608-637-2526

mosa@mosaorganic.org

www.mosaorganic.org

Other certifications and accreditations:
Additional verification as determined by
buyer need.

Certificates offered: crops, livestock, wild
harvest, handlers/processors

OREGON TILTH CERTIFIED ORGANIC

Chris Schreiner

470 Lancaster Drive NE

Salem OR 97301

503-378-0690 ext. 311

organic@tilth.org

Other certifications and accreditations:
Transitional certification; Compliance
with EU organic standards (EC 2092/91);
American Organic Standards: Fiber and
Textile Handling; USDA/Japan MAP export
agreement for organic product

Certificates offered: crops, livestock, wild
harvest, handlers/processors

**INTERNATIONAL CERTIFICATION
SERVICES, INC.**

(dba, Farm Verified Organic)

Christina Dockter

301-5th Avenue SE

Medina ND 58467

701-486-3578

info@ics-intl.com www.ics-intl.com

Other certifications and accreditations:
Farm Verified Organic (FVO) - a
private program that meets NOP and
has additional requirements for the
international marketplace, Bio Suisse
(add-on to the FVO program)

Certificates offered: crops, livestock, wild
harvest, handlers/processors

**MINNESOTA CROP IMPROVEMENT
ASSOCIATION**

Brenda Rogers

1900 Hendon Avenue

St. Paul MN 55108

612-625-7766

brenda.rogers@mncia.org

www.mncia.org

Other certifications and accreditations:
JAS, EU, NOP

Certificates offered: crops, wild harvest,
handlers/processors

**ORGANIC CROP IMPROVEMENT
ASSOCIATION - MINNESOTA
CHAPTER #1**

Lorri Ann Hartel

2609 Wheat Drive

Red Lake Falls MN 56750

218-253-4907

info@mncia.org

www.mncia.org

You may also contact OCIA International
in Lincoln, Nebraska at 402-477-2323.

Other certifications and accreditations:
OCIA International, Bio-Suisse, JAS, EU,
CAQ, JAS Equivalency, Swiss Ordinance

Certificates offered: crops, livestock, wild
harvest, handlers/processors

**IOWA DEPARTMENT OF AGRICULTURE
AND LAND STEWARDSHIP**

Maury Wills

Organic Program

Des Moines IA 50319

515-281-5783

maury.wills@idals.state.ia.us

www.agriculture.state.ia.us/organicAg

Certificates offered: crops, livestock, wild
harvest, handlers/processors

ONECERT

Samuel K. Welsch

2811 Tennyson Street

Lincoln NE 68516

402-420-6080

sam@onecert.net

www.onecert.net

Other certifications and accreditations:
Europe EEC 2092/91, Japan Export

Certificates offered: crops, livestock, wild
harvest, handlers/processors

PENNSYLVANIA CERTIFIED ORGANIC

Leslie Zuck

406 South Pennsylvania Ave.

Centre Hall PA 16828

814-364-1344

pco@paorganic.org www.paorganic.org

Certificates offered: crops, livestock, wild
harvest, handlers/processors

PRIMUSLABS.COM

Brian Mansfield
 2810 Industrial Parkway
 Santa Maria CA 93455
 805-922-0055
 Brian@primuslabs.com

Other certifications and accreditations:
 EUREPGAP

Certificates offered: crops, handlers/
 processors

STELLAR CERTIFICATION SERVICES

Jim Fullmer
 PO Box 1390
 Philomath OR 97370
 541-929-7148
 fax: 541-929-4387

demeter@peak.org

Other certifications and accreditations:
 Demeter Biodynamic, Aurora Certified
 Organic

Certificates offered: crops, livestock, wild
 harvest, handlers/processers

OCPP/PRO-CERT CANADA INC.

J. Wallace Hamm
 Box 100 A, Rural Route #3 Saskatoon
 S7K3J6 CANADA
 306 382-1299
 Procertorganic@yahoo.com

www.ocpro.ca

Other certifications and accreditations:
 OC/PRO Standards; Canadian Organic
 Standards; EU Regulation 2092/91;
 Quebec Standards, JAS (Japan)

Certificates offered: crops, livestock, wild
 harvest, handlers/processers

QAI, INC.

Tom Chapman
 9191 Towne Centre Drive, Ste 510
 San Diego CA 92122
 858-792-3531
 tom@qai-inc.com
 www.qai-inc.com

Other certifications and accreditations:
 IFOAM, EEC 2092/91 (EU), JAS, CAAQ,
 Source, Fiber, Personal Care

Certificates offered: crops, livestock, wild
 harvest, handlers/processers

WASHINGTON STATE DEPARTMENT OF AGRICULTURE

Miles McEvoy
 PO Box 42560
 Olympia WA 98504-2560
 360-902-1924
 Organic@agr.wa.gov

Other certifications and accreditations:
 European Organic Certification under ISO
 Guide G5; IFOAM JAS verification under
 ISO Guide 65

Certificates offered: handlers/processers

SASKATCHEWAN ORGANIC CERTIFICATION ASSOCIATION, INC.

Russell Plamondon
 Box 2293 Tisdale Sk.
 S0E1T0 CANADA
 306 873-2207
 fax: 306-873-4941

p.and.e@sasktel.net

Other certifications and accreditations:
 Eurocert EU; Biosuisse; JAS

Certificates offered: crops, livestock, wild
 harvest, handlers/processers

QUALITY CERTIFICATION SERVICES

Marty Mesh
 PO Box 12311
 Gainesville FL 32604
 352-377-6345
 qcs@qcsinfo.org www.qcsinfo.org

Other certifications and accreditations:
 Specific retail practices, private standards

Certificates offered: crops, livestock, wild
 harvest, handlers/processers

ARGENCERT S.R.L.

Laura Cecelia Montenegro
 Bernardo de Irigoyen
 972-4th B
 (1072) Buenos Aires ARGENTINA
 54 11 4963 0033
 argencert@argencert.com.ar

Other certifications and accreditations:
 IFOAM; EU 2092/91

Certificates offered: crops, livestock, wild
 harvest, handlers/processers

ECOCERT INTERNATIONAL

Michel Reynaud
 Gueterbahnhofstrasse 10
 D - 37154
 Northheim GERMANY
 49 55 51 90 843 0
 info@ecocert.de antje.rachel@ecocert.com

Other certifications and accreditations:
 JAS; EC Regulation 2092/91

Certificates offered: crops, livestock, wild
 harvest, handlers/processers

A FEW KEY QUESTIONS:

DO I QUALIFY FOR CERTIFICATION?

Compliance with the NOP regulation determines whether your organic operation is certifiable. To keep from wasting resources and time on a certification application that has little chance of success, potential applicants should evaluate key aspects of their farm operation and management. It is relatively easy to get a good sense for the probability of success by requesting and reading certification materials from one or more certification agencies. For a detailed checklist, look up the National Organic Program Compliance Checklist for Producers or for Handlers developed by the Appropriate Transfer of Technology to Rural Areas (ATTRA) (see Publications in Resources). In general, there is a reasonably good chance of being certified if you can answer “yes” to the following questions:

.....
**Answering whether
your operation
is eligible for
certification, whether
certification is useful
to you, and how you
view the challenges
and benefits, will help
you decide whether
certification is for you.**
.....

- Are you making a conscious and effective attempt to build up your soil?
- Is your current or planned crop rotation sufficiently long and diverse to minimize pressure from insects, diseases, and weeds?
- Are you using generally accepted conservation and erosion-prevention measures in your system?
- Have you not used prohibited materials, including synthetic fertilizers and pesticides, on the fields requested for certification for at least 36 months prior to harvest of the first organic crop?
- Have you made progress in learning to identify and understand the life cycles of the farm’s most troublesome pests?
- Do you keep records of field activities, crops planted, inputs used, harvests, storage, and sales?

Keep in mind that you may initiate certification on a field-by-field basis, increasing the number of fields each year until your whole farm is organically managed and certified. You do not have to convert your entire farm to organic production, though some farmers do. If you maintain a “split operation” (part organic, part conventional), then you must have the ability to prevent commingling and contamination of organic crops.

.....
**Organic certification
is done by private
certification
organizations or
state departments
of agriculture, that
have been accredited
by the United States
Department of
Agriculture.**
.....

WILL CERTIFICATION BE A USEFUL ADDITION TO MY MARKETING?

Organic certification is a marketing tool. Certification may open certain markets and it may provide a price premium, but it is important to remember that the organic industry is still young and possesses challenges. The basic criteria of sound marketing (quality, reliability, presentation, price, etc.) still apply to certified organic products. The responsibility for marketing the product remains with the producer. Sometimes marketing products as organic can be more difficult than marketing conventional products due to the comparatively small size and evolving nature of the organic market. For producers who want to enter the organic market, certification is essential, but it is important to understand that certification is only one component of marketing, not a substitute for marketing.

WILL ORGANIC CERTIFICATION MAKE ME RICH?

Many producers first consider a shift to certified organic production because they have heard stories of excellent prices and market premiums for organic products. While certification may promote greater profits over the long run, it is definitely not a path to easy money or a way to save the farm. Organic producers must be willing to approach specialty markets and accept that the organic market requires a long-term commitment. In addition, you may need to invest substantial time and resources before you are able to reap the rewards of obtaining organic certification for your products.

WHAT ARE THE CHALLENGES OF CERTIFICATION?

Organic crop production has many challenges. As with any new system of management, producers experience a learning curve as they develop pest and fertility management systems based on the unique characteristics of their land, without the aid of synthetic pesticides and synthetic fertilizers. During the learning period, there may be greater production risks and a potential for lower yields, at least in the short-term. In addition to the agronomic challenges presented by organic production, there is paperwork. Many certified producers consider the organic premium to be primarily a payment for the extra administrative efforts required to receive and maintain certification. A detailed audit trail must be maintained for organic products. Others see recordkeeping as a valuable management tool that contributes to the overall profitability of the farm. A producer who does not keep good records should take this into consideration before applying for certification.

.....
**There are both
benefits and costs
associated with
organic certification.**
.....

WHAT ARE THE BENEFITS OF ORGANIC CERTIFICATION?

- Many certified organic products command a premium price.
- Due in part to premium prices, the profitability of small farms with certified organic production systems can be competitive with that of larger conventional farms.
- Most of the time, merchandisers and retailers dealing in organic products cannot sell products labeled “organic” unless they have been certified.
- The organic food market has grown 15 percent to 21 percent since 1997, when comprehensive data was first available, and based on historical survey and interviews is estimated to have grown nearly 20 percent annually since 1990 (Source: Organic Trade Association (OTA) 2006 Manufacturer Survey). This translates to future demand for certified organic products.
- Organic farming has been one of the fastest growing segments of U.S. agriculture for over a decade. The U.S. had fewer than a million acres of certified organic farmland when Congress passed the Organic Foods Production Act of 1990. By the time USDA implemented national organic standards in 2002, certified organic farmland had doubled, and doubled again between 2002 and 2005. Source – USDA Economic Research Service, <http://www.ers.usda.gov/Data/Organic/>

WHAT ARE THE COSTS OF ORGANIC PRODUCTION AND CERTIFICATION?

- Increased management
- Increased labor
- Certification fees
- Inspection fees
- Increased paperwork/recordkeeping

An Overview: Certification and the Organic Industry

THE BEGINNINGS OF ORGANIC CERTIFICATION

For years, while organic products were traded on a small scale and generally in the region where they were grown, personal trust functioned relatively well as an assurance of organic quality. As more and more farmers adopted organic methods, organic products began to circulate in interregional and international commerce. It became increasingly difficult to establish or maintain the trust relationship between consumers and distant producers. Also, demand for most organic products exceeded supply and the gap was occasionally filled with conventional product fraudulently marketed as organic.

Thus, a need arose to regulate and validate organic production through standards created by consumers, producers, processors, and experts in the industry. At the same time, the word “organic” appeared to be destined for the same dilution-effect in the marketplace as was earlier experienced by the term “natural.” To clearly define and identify “organic”, the industry began to institute certification in the early 1980s.

THE DEVELOPMENT OF PRIVATE, THIRD-PARTY CERTIFICATION AGENCIES

Private certification agencies arose through grassroots efforts. These agencies, governed by their members, were established to verify the authenticity of the organic products grown or processed in their region and so protect the term “organic” in the marketplace. Each agency created its own certification standards to signify healthy, quality food grown with the environment and community in mind.

By the mid-1980s, organic certification had generally come to resemble the present system. Producers could choose from several regional, national, or international programs. Also, organic growers, businesses and certifiers came to a broader agreement on fundamental organic standards. Organic certification developed into a credible system for passing an organic guarantee all along the chain of ownership, from producer to consumer.

FEDERAL REGULATION AND THE NATIONAL ORGANIC PROGRAM

The Organic Foods Production Act (OFPA) is a section of the 1990 Farm Bill which called for the establishment of the National Organic Program (NOP) and the National Organic Standards Board (NOSB). The NOP exists under the authority of the United States Department of Agriculture (USDA). The Secretary of Agriculture appoints NOSB members to assist in the development of national organic standards and to advise the secretary on materials approved for use in organic production and handling. With input from the NOSB, the National Organic Program has developed national organic standards for production, processing, handling, and labeling of organic products as well as a list of prohibited and allowable materials in the organic industry.

The NOSB recommendations were incorporated into the proposed rules, which were published in the federal register for public comment in December 1997 and again in March and December 2000. By 2001, over half of the states in the U.S., including Minnesota, had passed legislation regarding organic labeling and certification. In 2002, the federal organic rule went into effect. It now governs organic production, processing, and commerce throughout the U.S. (See USDA-NOP Rule Summary in Appendix B.) A clear Rule ensures consistency in certification, and allows farmers to use feed from any organic-

certified source. THE OUTLOOK FOR ORGANIC PRODUCTS

The organic food market grew 16.2 percent in 2005 and accounted for \$13.8 billion in consumer sales, representing 2.5 percent of total U.S. food sales. Organic foods have shown consistent annual growth rates of 15 percent to 21 percent since 1997, when fairly comprehensive data was first available (Source: OTA's 2006 Manufacturer Survey.) Organic products have established themselves in mainstream distribution and retail markets. Organic food is available in all varieties and types, with rapid growth seen in convenience food items since 1990.

The Certification Process

STEP 1: TRANSITION TO ORGANIC PRODUCTION

As indicated in *Do I Qualify for Certification?*, prohibited chemical inputs must not have been applied to a field for 36 months prior to harvest of the first certifiable crop. This period is referred to as the **transition period**. Most certified organic producers recommend starting with a few acres as a testing ground for new methods of pest control, crop rotation, tillage, and soil health maintenance. This approach will ensure that you can maintain economic viability while transitioning to a new method of agriculture on other fields. During transition, it is important to get information from other certified organic farmers about how they manage their operations. You can do this by contacting one of the mentor farmers who are part of the Minnesota Organic Farming Information Exchange (MOFIE - organicecology.umn.edu/mofie); calling the Midwest Organic and Sustainable Education Service (MOSES) toll-free Farmer Transition Hotline (888-551-4769); joining a local Sustainable Farming Association chapter (www.sfa-mn.org) or other appropriate group; or asking for information from other producers who have certified organic crop or livestock systems. The certification agency you choose should work with you to provide information and to connect you with certified organic producers in your area. Although not required, it is recommended that you work with your certifier during the transition period, so that there are no surprises.

Approved materials for certified organic production include composted manures, naturally mined minerals, and some biological pest controls such as naturally derived Bt sprays. However, some products that may appear natural (such as municipal sewage sludge) are prohibited for use in organic production systems as noted in the Rule (see Appendix B, Subpart G on page 43). In addition, genetically modified organisms are also prohibited by the Federal Rule. It is important that you consult the National List of Allowed and Prohibited Substances, available from your certifier and the NOP. This list will help you make management decisions that won't jeopardize your eligibility for organic certification. The Organic Materials Review Institute (OMRI) screens products for compatibility with NOP National List requirements. You can view the "OMRI Brand Name Products List" at www.omri.org.

DO I HAVE TO BE CERTIFIED?

If your gross agricultural income from organic sales totals \$5,000 or less annually, you are exempt from certification requirements. You don't have to complete an Organic System Plan, but you must comply with all NOP production and labeling requirements. You can sell your products as "organic" or "organically grown" at a farmers market, on-farm stand, CSA, or to a retail outlet, but you cannot sell your products as organic ingredients to be processed by others or as organic livestock feed used by a certified organic livestock producer. Your products cannot be represented as "certified organic" or display the USDA Organic seal (unless you choose to get certified).

STEP 2: CHOOSING A CERTIFICATION AGENCY

It is important to choose a certification agency during the early stages of the 36-month transition period. The relationship should be started early to ensure that the production system is properly managed during the transition period and that

.....
A field must be free of prohibited chemical inputs for at least 36 months prior to harvest of the first certifiable crop.
.....

.....
The USDA accredits Certification Agencies under the National Organic Program.
.....

prohibited practices or materials are not used inadvertently on your fields during that time. Your certification agency can help you set up for successful certification following transition.

CONSIDERATIONS IN CHOOSING A CERTIFICATION AGENCY

At present, the USDA has accredited a large number of certification organizations. The MDA maintains a list of organizations that certify operations in Minnesota. Diversity exists among the competing certification agencies and you should choose a certification agency that best meets your needs. Considerations include the structure of the organization, policies and procedures, reputation, costs, location, additional services, international recognition, and trademark use. Rodale's NewFarm.org website has a Guide to U.S. Organic Certifiers at www.newfarm.org/ocdbt. In order to choose the right agency, you should review these considerations, and talk with other certified farmers to get a clearer idea of the agency's quality of service.

DOES THE ORGANIZATION OF THE AGENCY SERVE MY NEEDS?

Another area of considerable variation among certification agencies is the nature of their membership or constituency. Some agencies are owned and controlled by members (both producers and processors/handlers). This can be reassuring to those who are skeptical of corporate control and the possible distortions of the certification system that could result. Also, this type of structure ensures that organizational decisions are made by people who understand organic production and processing. However, this kind of organization requires active participation by all members and may require that you volunteer time for the organization.

A common organizational structure for certification programs is the corporation, whether nonprofit or for-profit. Most of these programs exist solely to provide certification. They do not buy or sell the products that they certify, and they exhibit a "brand-neutral" philosophy for their certification seal. These organizations usually consist of an administrative staff, third-party reviewers, and a board of directors consisting of producers, processors, and other experts in the industry. (Under NOP conflict of interest provisions, producers and processors who serve on the board of directors must not be certified by that agency.)

HOW MUCH WILL CERTIFICATION COST?

Fee structures vary by certification agency. Some have a flat fee that includes many if not all services of processing the application. Others may have smaller initial fees but add user fees for additional services. Some charge a fraction of a percent of sales, so that larger operations pay more than smaller ones. It is important to ask about the fee structure for your particular operation and the services that are included in or additional to that fee. Certifiers are required by the NOP to make their fee schedules available to the public. Go to NewFarm website's "Guide to U.S. Organic Certifiers," www.newfarm.org/ocdbt, for information about current fee schedules.

WHAT IS THE ORGANIC CERTIFICATION COST SHARE PROGRAM?

In 1999, Minnesota implemented the first organic cost-sharing program in the nation. Available through the Minnesota Department of Agriculture, this program reimburses producers for a portion of their certification costs. Minnesota's program served as a model for a federal cost share program that provides up to 75 percent of the cost of certification with an annual maximum of \$500. When available, those funds are also administered by the State. For more information and application materials, contact the Organic Program at the MDA (see Resources).

WHAT IS THE CERTIFICATION AGENCY'S REPUTATION?

In selecting a certification agency, consider your desired market. If you plan to sell in U.S. markets, certification by accredited agencies is equivalent. If you plan to sell in an international market, your buyer may require certification by a specific agency. For export, you may also need to be certified as compliant with the standards in effect in the target market, such as Europe or Japan. Local or regional agencies have a tendency to be less expensive because they do not have the expenses associated with administering a national or international program.

If you have a specific market in mind, find out what certification agencies these markets tend to prefer. Many producers who sell only to local or regional markets will select regional agencies, due to name recognition and/or personal service. However, many producers choose a national/international agency because their products are then seen with the same seal as a wide range of well-known, national or international products.

HOW DOES TRADEMARK POLICY AFFECT ME?

An important question for certification is who owns the certification trademark and its use on certified product. All of the certifiers that operate in Minnesota have brand-neutral certification programs. In brand-neutral certification programs, the certified producer owns the right to use the seal or trademark on all certified products sold from his or her farm to any buyer. The producer, therefore, has more freedom in the marketplace, but also is solely responsible for marketing the product. Some certifiers take a more active role in assisting their clients with marketing by posting lists of all operations and products certified. You will want to find the certifier that best fits your needs.

WILL I WANT TO USE THE USDA ORGANIC LOGO?

That decision is up to you. Use of the USDA Organic logo is voluntary. All certified operators have the right to use the logo or seal on all products that comply with the regulations. Once certified by an accredited certifier, you can use the USDA Organic seal on your advertising, web site, farmers' market stand, and on product labels that contain at least 95 percent organic ingredients.

STEP 3: ESTABLISHING A CERTIFIABLE AUDIT TRAIL

WHAT IS AN AUDIT TRAIL?

"Audit trail" is defined by the NOP as "Documentation that is sufficient to determine the source, transfer of ownership, and transportation of any agricultural product labeled as "organic" ..."

The integrity and value of your organic crops depends on careful record keeping. An audit trail is a recordkeeping system in which all field activities and inputs are recorded and by which a product can be traced from field to sale via a lot number. All certification agencies require an accurate and complete audit trail. Logs are used to record specific and routine field management activities, harvest activities, post-harvest handling, storage, and sales. At the time of inspection, the inspector reviews the audit trail for documented field activities and verifies that all inputs, practices, and products are in compliance with the organic standards.

In addition, the inspector randomly selects some products to trace through the system in order to verify that the lot number and quantities associated with the product remain the same throughout the operation. This auditing assures the certification agency and,

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Trademark policy, the organization's constituency and reputation, and the cost of certification are also factors in choosing a certification agency.
.....

.....
The audit trail is the recordkeeping system in which all field activities and inputs are recorded and by which a crop can be traced from field to sale via its lot number.
.....

ultimately, the consumer, that no conventional product has slipped into the system. Thus, it is especially important for producers who farm both conventional and organic fields (split operations) to develop a clear audit trail that documents the separation of conventional and organic products.

Audit trail systems are unique to each operation and should contain the necessary elements to track products for that operation—the system doesn't need to be complicated. Audit trails can be simple and functional, and they need to be designed to fit the operation. For example, lot numbers are essential for operations that produce bulk commodities, such as grains and beans. Lot numbers are not needed for operations that sell their products at farmers markets or through CSAs.

COMPONENTS OF A GOOD LOT NUMBERING SYSTEM

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A good lot numbering system is essential for tracking the crop's history from the field to the point of sale.
.....

Lot numbers play a critical role in the identification of product as it moves through the organic system from the field to the final point of sale. A lot number is a code assigned by producers to the crop as it leaves the field. As the crop moves through storage, processing, and sale, the lot number serves to link products back to fields of production. There is no standard method for developing a lot numbering system, but it should be as simple as possible. Lot numbers are unique to each operation, but must be used consistently once established. For most producers, the lot number generally indicates the type of crop, field number or storage unit, and year of production. It may also contain the producer's initials.

If product is sold directly from the field, the lot number should contain the field numbers from which the organic product was harvested. For instance, the lot number code, S12131907, means the following:

Example of Lot Number: Sold directly from the field

S12131907

S 121319 07

(organic soybeans) (fields 12, 13 and 19) (year 2007)

If organic product is stored in a storage bin, the lot number should include the storage bin number, but need not include the field number. In this instance, a storage bin record must show date of harvest and the field numbers of the harvested crop that went into that bin. This information can be included in the Harvest and Storage Record as shown in our example, or in a separate record. The lot number code, DJSB807, means the following:

Example of Lot Number: Stored in a storage bin before sale

DJSB807

DJ S B8 07

(Dave Jones) (organic soybeans) (bin #8) (year 2007)

It is important to remember that the farm-level lot number is often associated with the product after the producer has sold the product. For example, the lot number a producer assigns to a load of organic soybeans is required at the bagging and

cleaning plant or the brokerage house. It may even be linked to a new lot number assigned to the tofu product that resulted from that initial load of soybeans.

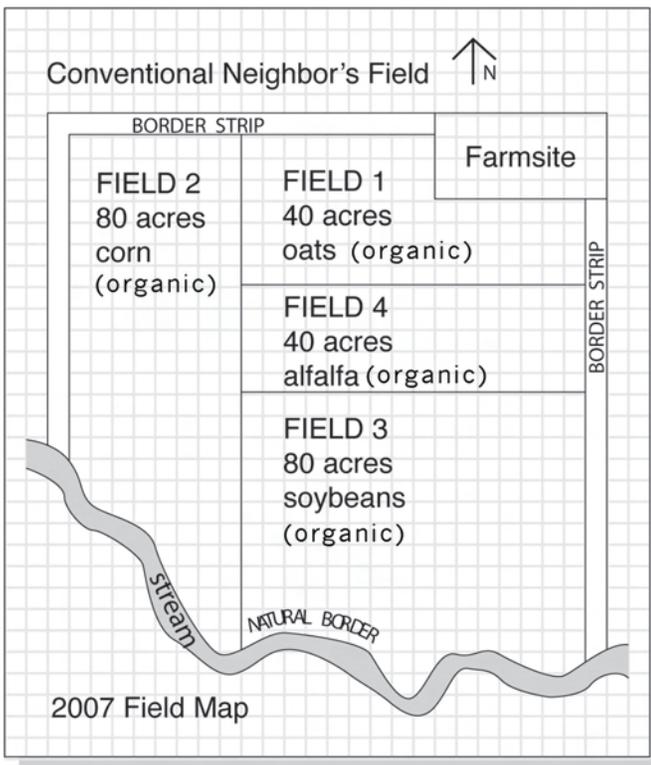
ELEMENTS OF A COMPLETE AUDIT TRAIL

Sample forms that you can photocopy and use on your own farm for many of these elements are included in Appendix C. Additional recordkeeping templates are available from ATTRA at www.attra.org/organic.html. Use the recordkeeping template forms as a guide in establishing a certifiable audit trail. Feel free to modify or adapt the forms to best suits your needs. Some of the forms must be submitted directly to the certification agency during the application process. Others provide recordkeeping and back-up information to support your application. Here are the required elements of a complete audit trail.

FIELD/FARM MAPS

Field maps must include all conventional, transitional, and organic acreage, roads, and other geographical information such as creeks, groves, and drainage ditches. Field numbers and individual field acreages, as well as the width of field borders or buffer zones should be indicated on the maps.

In contrast to conventionally farmed fields, certified organic fields must have a border around the sides of fields that are in contact with conventional cropland or land with potential sources of contamination. This border is used as a buffer zone and may be:



- a portion of the field itself that is harvested for conventional sale,
- a natural barrier such as a grass strip or grove of trees that is not sprayed with chemicals, but provides wildlife habitat or habitat for beneficial species,
- an unsprayed ditch, field road or waterway.

The required width of field borders will depend upon the adjoining use and contamination potential—check with your certifier.

Request a field map for your farm from your local Soil and Water Conservation District (SWCD), Natural Resource Conservation Service (NRCS) or Farm Service Agency (FSA) office. They have maps for every section of every county in Minnesota. If you know the legal description of your property, you can locate your land in the county directory and photocopy that map. Use colored marking pens to indicate borders, field numbers, acres and other characteristics, and submit it with your application materials.

FIELD HISTORY SHEETS

All certified fields under organic production must be numbered and have a documented field history for the 36 months prior to harvest. This record should contain the field number, crop, status (organic, transition, or conventional), acres, summary of inputs, yield, planting and harvest dates, and storage information.

Field #	Crop	OG / T / C	Acres	Rent / Own	Yield Per Acre	Harvest Date	Storage Location
1	oats	OG	40	own	45 bu	July 18	n/a
2	corn	OG	80	own	80 bu	Oct 10	Bin 3
3	soybeans	OG	80	own	30 bu	Sept 30	Bin 2
4	alfalfa	OG	40	own	4 tons	June/July/Aug	hayloft

ACTIVITY LOG

The activity log is a detailed account of actual production practices such as dates and types of tillage, dates of planting and varieties, custom services, input records, noted problems, weather conditions, equipment settings, method of equipment cleaning, pest control, sanitation procedures for storage sites or equipment, and other activities or observations. The activity log may be in the form of a journal, field notebook, calendar, or computer spreadsheet. This information may also be included, or summarized, on field history sheets. Activity logs are not typically submitted to the certifier with your Organic System Plan, but must be present and complete for the inspector to review.

Date	Field #	Activity	Type of Input	Source of Input	Product Label and Receipt (check)	Rate of Application	Other comments and observations
April 10	1	fertilizer appl.	manure	own	none	2T/ac.	composted
April 10	2	↓	↓	↓	↓	↓	↓
April 10	3	↓	↓	↓	↓	↓	↓
April 10	4	↓	↓	↓	↓	↓	↓
June 6	2	cultivate					
June 6	3	cultivate					

INPUT RECORD

Note: Genetically modified or engineered seed (GMO, GEO), fungicide treated seeds, and sewage sludge are strictly prohibited in organic production during all 36 months of transition through certification.

Input records are required for organic certification. The input record may be incorporated into the activity log (as shown on the activity log example) or field history sheet, or may be a separate piece of the audit trail. Use it to record the use of both farm-produced and off-farm inputs such as manure, compost, and approved commercial products. Information listed on the input record should include the date of application, field numbers, type of input, source, retention of product labels and receipts, and rate of application. Labels for all products and receipts of purchase must be kept, since the inspector will review them for compliance with the organic standards. Failure to have a label that lists the ingredients of the applied input may seriously jeopardize the success of certification. Note: Any inputs you use during the transition period of your production system must be in compliance with the NOP organic standards. Remember, organic production methods must begin during the first year of transition. Check with your certifier before you purchase or apply any inputs. Keep your seed tags and input product labels and receipts!

Harvest and Storage Record – 200__ Crop Year									
Date of Harvest	Certified Organic Crop	Field #	Yield	Lot #	Storage Bin #	Quantity In	Quantity Out	Current Inventory	Sales Invoice #
7/18	oats	1	1800 bu	O-1-07	n/a	n/a	n/a	0	85608
9/30	soybeans	3	2400 bu	S-B2-07	2	2400 bu	2400	0	93116
10/10	corn	2	6400 bu	C-B3-07	3	6400 bu	2000	4400	10486

HARVEST AND STORAGE RECORD

The harvest and storage record contains the date of harvest, crop, field number, yield, lot number, and storage bin number (if applicable). In the example above, the oats were sold directly from the field while the soybeans and corn were stored in storage bins. Note: Rather than keeping storage records by crop year, as this example suggests, you can also keep individual storage bin records for multiple years.

Sales Record – 200__ Product										
Date	Commodity	Lot #	Quantity	Organic Certificate #	Buyer	Sales Invoice #	TC #	Scale Ticket or BOL #	Transaction Fee? (\$)	Total Sale (\$)
7/18	oats	O-1-00	1800 bu	#4569	Broker	85608	1509	3492	\$ 18	\$ 3,600
12/21	soybeans	S-B2-00	2400 bu	#4569	Smith	93116	1743	3719	\$ 120	\$ 24,000
2/2/98	corn	C-B3-00	2000 bu	#4569	Jones	10486	1859	1302	\$30	\$ 6,000

SALES RECORD

The sales record shows date of sale, product sold, lot number, quantity, organic certificate number, buyer, sales invoice number, transaction certificate number, bill of lading number, and scale ticket number. The organic certificate number will be listed on your certificate once you are certified. The transaction certificate (TC) number will be listed on the transaction certificate, discussed in more detail below. The sales record can be used as an audit trail summary for quick tracking of products.

TRANSPORTATION CLEANING AFFIDAVIT

If a third party is hired to ship product (for example, a bulk grain truck), the producer may have to supply a transportation cleaning affidavit stating that the vehicle used for shipment has been properly cleaned and that there is no possibility for contamination from previously hauled products. (Proper cleaning methods include sweeping and vacuuming.) This form is signed by the third party involved with shipping. Check with your certification agency to see whether this form is needed. If it is, the agency can supply you with the proper form.

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A transaction certificate (TC), obtained from the certification agency, helps track products when ownership is transferred.

The Transaction Certificate: What Is It?

The transaction certificate (TC) becomes an element of the audit trail after organic certification is achieved. Once your operation is certified, transaction certificates, or TCs, are used by some certification agencies to record all transactions of certified organic products during the year. A TC is issued for each transaction during the year. Transaction fees are paid only when the crop is sold on the organic market, not when sold on the conventional market. The certificate contains a serial number and documents the details of a transfer of ownership of certified organic product, such as the date, the parties involved in the trade, the commodity traded, the quantity, the lot number of the product, and the organic certificate number under which the operation was certified.

When a producer contacts the certification agency with information about the sale, such as date, buyer, commodity, lot number, and quantity, the agency issues the TC and sends

copies of the TC to the seller and buyer. (Some certifiers do not use a TC system. Check with your certifier regarding their policies and procedures for TCs.)

The organic certificate number is listed on all organic certificates issued by a certification agency to a certified producer. This number is used on various documents, such as sales invoices, as proof of certification. By requiring the organic certificate number on a TC, the certification program can guard against the fraudulent trade of products under a suspended or revoked organic certificate or the infiltration of conventional food products.

Most certification programs will require either a TC or export certificate for all international trades. They may or may not require a TC for domestic trade. In addition, some certification programs have fees associated with obtaining a TC.

STEP 4: THE ORGANIC SYSTEM PLAN APPLICATION

Once you have chosen a certification agency and the 36-month transition period is nearly completed on selected fields, the producer is ready to begin the application process.

The first step is to complete an Organic System Plan (OSP), which is an application form obtained from your certifier. The NOP defines an “organic system plan” as a “plan of management of 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” which demonstrate how the operation complies, or intends to comply, with organic certification requirements.

Application forms, including the OSP, and instructions should have been included with the original packet of information that was sent from the certification agency. If not, contact the agency and they will send you the required application materials and any additional instructions. When you complete the application, you will be asked to list the exact crops (and acreage) or products requested for certification. The procedure for each agency can vary. However, these three pieces of information are a part of any application process:

- 1) a documented three-year field history that includes activities during the transition period,
- 2) a farm management plan (OSP) that describes your current practices and future plans for soil fertility, pest control, weed control, inputs used or planned for use, audit trail, and other information required by the certification agency,
- 3) copies of field maps for all fields requested for certification.

After your first year as a certified organic producer, you will typically have to submit only a shorter update form.

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The application process begins as the 36-month transition period is nearly complete. All agencies will require at least a 3-year field history, a farm management plan, and a completed questionnaire with backup records.
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THREE-YEAR FIELD HISTORIES

During the 36-month transition period, you will have kept accurate field histories, as explained in “Elements of a Complete Audit Trail.” It is important that this information be well-documented as it has great influence on the final certification decision. Field histories you use in your application will rely heavily on the field history sheets you developed while establishing your audit trail.

ORGANIC SYSTEM PLAN

The OSP gives you an opportunity to describe your current and future management strategies. Although developing this plan can seem burdensome at first, most producers agree that it gives them an opportunity to examine their goals, philosophies, and management practices. The OSP summarizes the strategies and inputs you will use to:

- manage soil fertility with natural and approved inputs and crop rotation;
- reduce soil erosion;
- manage weeds, diseases, and other pests using approved organic practices;
- describe the recordkeeping system (audit trail) that tracks your products from field to buyer;
- list all substances to be used as production or handling inputs, indicating their composition, source, location(s) where they will be used;
- describe your monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented;
- describe the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and
- address any other issues as directed by the certification agency.

In the OSP application, you may also be asked to explain your understanding of and commitment to organic agriculture. Why do you want to be a certified organic producer? How does your management style reflect your commitment? What are some of the strategies that will lead to organic production methods over your total acreage? Be sure to include potential crop rotations, tillage methods, plans to incorporate livestock, use of inputs to improve and maintain soil health, and approved control methods for pests and weeds. The certifier will understand that some of your plans may change, but it is important for them to know what you are thinking.

Most producers choose gradual transition from conventional to organic production, rather than converting the entire farm at once. Many producers in the initial stages of the certification process manage “split operations”, which produce or handle both organic and non-organic agricultural products.

Organic certification agencies encourage long-term commitment to organic agriculture and the benefits that are sustained through these practices, but cannot require conversion of the entire operation. Records (farm histories, inputs, harvest, sales)

must be kept for all fields (organic, transitional, and conventional) in a split operation, and the inspector must be provided access to records pertaining to conventional production, upon request.

THE QUESTIONNAIRE

A completed questionnaire, which is typically integrated into the OSP form, is an essential part of any application process. The length and range of questions will vary depending on the certification agency you have chosen.

In general, the OSP questionnaire asks about operation profile, crop rotation, soil management, seed sources, equipment uses in split operations, post harvest handling and storage, irrigation and water source, prohibited materials storage, pest control, and field histories for the farm.

DO NOT LEAVE ANY QUESTION UNANSWERED! This may appear too obvious to mention, but many applicants skip questions and provide incomplete responses, which frustrates certifiers and jeopardizes the success of the application. If a question is not applicable to your operation, then state that this particular situation does not apply. Do not leave the space blank. In contrast, if a question does pertain to your production system, answer the question as clearly and with as much information as you can provide. Do not assume that the certification reviewers will be able to decipher what you mean.

Also, do not assume that the inspector will elaborate in his or her report and fill in blanks that you left open. One-word answers do not paint a complete picture. Incomplete questionnaires may be returned to the applicant to be completed before being submitted to the review committee, resulting in a delay in processing the application. An incomplete questionnaire can reflect a half-hearted commitment to organic certification and may influence reviewers who will decide the fate of your request. Complete responses that are written neatly and clearly, or typed, will reflect the value that you place on your certification.

REMEMBER TO MAKE A COPY OF YOUR OSP TO RETAIN FOR YOUR RECORDS, BEFORE YOU SUBMIT IT TO THE CERTIFICATION AGENCY.

STEP 5: THE ORGANIC INSPECTION

WHO IS THE INSPECTOR?

The organic inspector is a trained, experienced professional who is qualified to evaluate an organic system. The inspector serves as the eyes of the certifying agency and the consumer. The inspector gathers information about your operation, but does not make the certification decision. Certification agencies may use an inspector who is on staff at the agency or who is an independent contractor. The certification agency assigns an organic inspector for your on-site farm inspection. Inspectors often group inspections together to save travel costs and consequently must adhere to a tight schedule. It is important to set aside time for the inspector. The inspection usually takes three to four hours.

WHO IS THE INDEPENDENT ORGANIC INSPECTORS ASSOCIATION?

Most organic programs use inspectors who have been trained by and are members of the Independent Organic Inspectors Association (IOIA). The IOIA includes organic production and processing inspectors as well as supporting members who are dedicated to maintaining high standards for organic inspection and inspection integrity. All members follow the IOIA's professional Code of Ethics and Code of Conduct.

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**The OSP
questionnaire,
which should be as
completely answered
as possible, also
requires field maps,
with substantiation
of field borders and
buffer zones, where
they apply.**
.....

This association provides training for new inspectors as well as continuing education programs and accreditation for experienced inspectors. Through training and other curricula, the IOIA promotes consistency in the inspection process. This consistency, coupled with common organic standards, facilitates cooperation between organic certification agencies.

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The organic inspector evaluates the production system, conducting a producer interview and a farm tour.
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WHAT ARE THE INSPECTOR'S RESPONSIBILITIES?

The inspector serves as the eyes and ears of the review board or certification committee at the certification agency. The inspector gathers information based on the producer's questionnaire and on his or her own observations at the farm. All information gathered is confidential and will only be seen by the client, the inspector, the certification committee reviewers, and some staff at the certification agency. Inspectors verify information given in the application and evaluate the adherence of the entire operation to the organic standards. The inspector is objective in his or her report and does not have authority over the final certification decision. The decision is made by the certifying agency, after reviewing your OSP and the inspector's report.

WHAT ARE THE INSPECTION PROCEDURES?

Although agencies may differ in the specific requirements of an inspection, the general procedure includes a producer interview, a farm tour of both the fields and the building site, and an exit interview. The inspection must occur before harvest, while the crops are still in the field. The inspector must be accompanied by someone knowledgeable about the operation.

THE PRODUCER INTERVIEW

During the producer interview, the inspector reviews your application, field histories, maps, input labels, and audit trail documents for the specific production system for which you are seeking certification. Questions may also pertain to your background and interest in organic agriculture as well as long-term plans for your land. The audit trail, consisting of all relevant records, is reviewed. Labels and ingredient information on all inputs are gathered. The inspector may request packaging labels or bags used for on-farm processed organic products.

THE FARM TOUR

The inspector tours the farm to verify information that is listed on the application and to look for potential problems.

The inspector verifies that the crops match the field acreage and field numbers on the application.

- The inspector verifies the use of borders on sides of fields that are adjacent to conventional cropland or to potential sources of contamination.
- The inspector reviews your soil fertility and management practices, and observes soil health and conservation practices.
- The inspector verifies your seed and/or seedling sources.
- If greenhouses are used, the inspector tours the greenhouses, evaluates plant health, soil mix, inputs, and general environmental conditions.

- The inspector notes weed, disease, and pest problems and discusses management and control strategies.
- If applicable, the inspector observes your irrigation system and inspects the source of water for the system. A water test for coliform bacteria and nitrates may be required if water is used to wash produce.
- The inspector tours the farm buildings, equipment, and post-harvest storage to verify the activities/storage listed in the OSP and to verify the farm has the infrastructure to complete the task described in the OSP.
- The inspector reviews the inputs list with the producer and notes any indications of prohibited substance use.
- The inspector notes any sources of potential contamination or areas of non-compliance with organic standards.

The inspector may take soil or tissue samples for testing, if there is reason to believe that contamination has occurred.

THE EXIT INTERVIEW

Before leaving your farm, the inspector is required to conduct an exit interview to:

- 1) confirm the accuracy and completeness of information obtained during the inspection;
- 2) describe any additional information that needs to be submitted to the certification agency;
- 3) discuss any issues of concern identified during the inspection.

THE INSPECTION REPORT

The inspector includes his or her observations in a written report that is submitted to the agency and used extensively in the review process. This report also contains the information gathered in the interview. Organic product labels, input labels (including seed tags), audit trail information or sample forms, and any other information collected during the inspection is also submitted to the certification agency for review.

TRANSITIONAL INSPECTIONS

In addition to being accredited by the USDA, some certification agencies are accredited by international agencies. In order to be compliant with international accreditation standards, some certifiers require an organic inspection during transition. Check with your certification agency to determine whether you will need an additional inspection or not.

STEP 6: REVIEW AND CERTIFICATION

The review of a client's application is usually done by a review or certification committee. This committee is most often composed of fellow producers and peers in the organic industry who are independent, third-party reviewers who have no conflict of interest with the client. All reviewers must observe the confidentiality policy. However, many variations to this review process are available and utilized by certification programs to create efficient and expedient systems that ensure organic integrity while offering good customer service. Once certified, you need to continue to keep records and comply with organic standards. You will also need to complete an annual update form to maintain certification. You should begin your annual certification update process at least three months before your current certified status expires.

APPEALING DECISIONS OF THE CERTIFICATION AGENCY

The federal organic rule provides that if your certification request is denied, you have the right to appeal that decision, and certification agencies must have an appeal process. A producer should contact the NOP to receive specific instructions for the appeals process. In general, a producer can appeal decisions that he or she feels were not fair, were based upon lack of information, were based upon misinformation, or did not consider "special circumstances." A producer should be prepared to provide documentation that supports the case for reversing or amending a decision made by the certification agency.

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Certification is continuous, as long as a producer updates his or her OSP, undergoes inspection, and pays any required fees each year.
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For information comparing the review and certification process of certification agencies that operate in Minnesota go to www.newfarm.org/ocdbt
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