

**BEHIND THE  
ORGANIC SEAL:**

**WHAT ORGANIC  
CERTIFICATION MEANS**

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## What is Organic?

- “Organic” - is a labeling term that indicates that the food or other agricultural product has been produced through approved methods that integrate cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.
- “Organic Certification” - is a process-based certification, based on the requirements of 7 CFR Part 205.



Photo by AGA

# A Brief History

- As chemical farming inputs started growing in use, some voices started advocating for other methods.
- The organic movement gained momentum in the 1970's.
- There was no official standard and different groups had different ideas about what it should be.
- Lack of clarity and consistency led groups to advocate for national standards.





# A Brief History

- Congress passed the Organic Foods Production Act (OFPA) in 1990, which authorized a USDA National Organic Program (NOP) and set standards for the production, handling, and certification of organically grown agricultural products.
- OFPA required the NOP to write regulations for organic food and fiber production.
- OFPA also called for an advisory group, the National Organic Standards Board (NOSB) to give recommendations about the regulations to the NOP.





## A Brief History

- After many years of work and negotiations, the final Rule was implemented in the fall of 2002.
- The Rule covers farms, livestock operations, food processors, and other “handlers.”
- The Rule has remained mostly the same, although small changes occur yearly.
- The USDA NOP has an accreditation process for companies/agencies that want to be certifying agents.





# Who should be certified?

- Any operation that that produces or handles crops, livestock, livestock products, or other agricultural products that are intended to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))”



# Exemptions / Exclusions

- Operations that sell less than \$5,000 annually of “organic” products.
- Retail food establishments.
- Operations that handle products with less than 70% organic ingredients or when the organic ingredients are only listed in ingredient panel.
- Operations that handle only packaged products.
- **These operations all still have to meet the USDA NOP Requirements!**







Just a few examples:

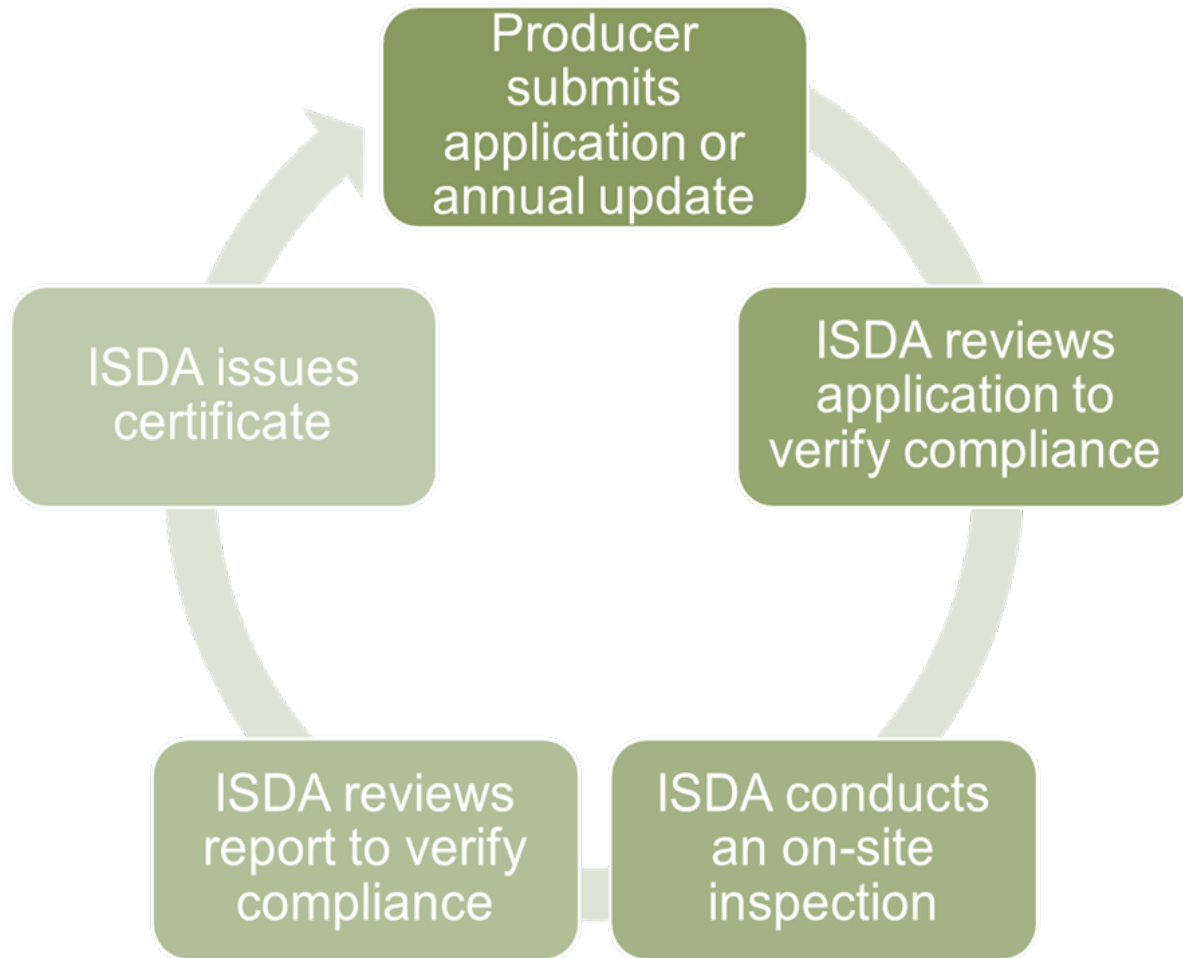


# Who oversees everything?

- The USDA NOP has an accreditation process for companies/agencies that want to be certifying agents (“certifiers”).
- There are 48 certifiers based in the U.S. and 32 in foreign countries.
- All certifiers follow the same rules and requirements.
- Certifiers cannot create rules above and beyond the NOP Rule.
- USDA NOP is responsible for overseeing certifiers & excluded/exempt operations.



# Certification Process



- Certified organic operations must be inspected and assessed every year.
- Certified operations have to pay the certifier for the certification process.
- Certifiers conduct unannounced inspections on at least 5% of certified operations yearly.
- Certifiers conduct sampling on at least 5% of certified operations yearly to test for pesticide residues.



# Fees

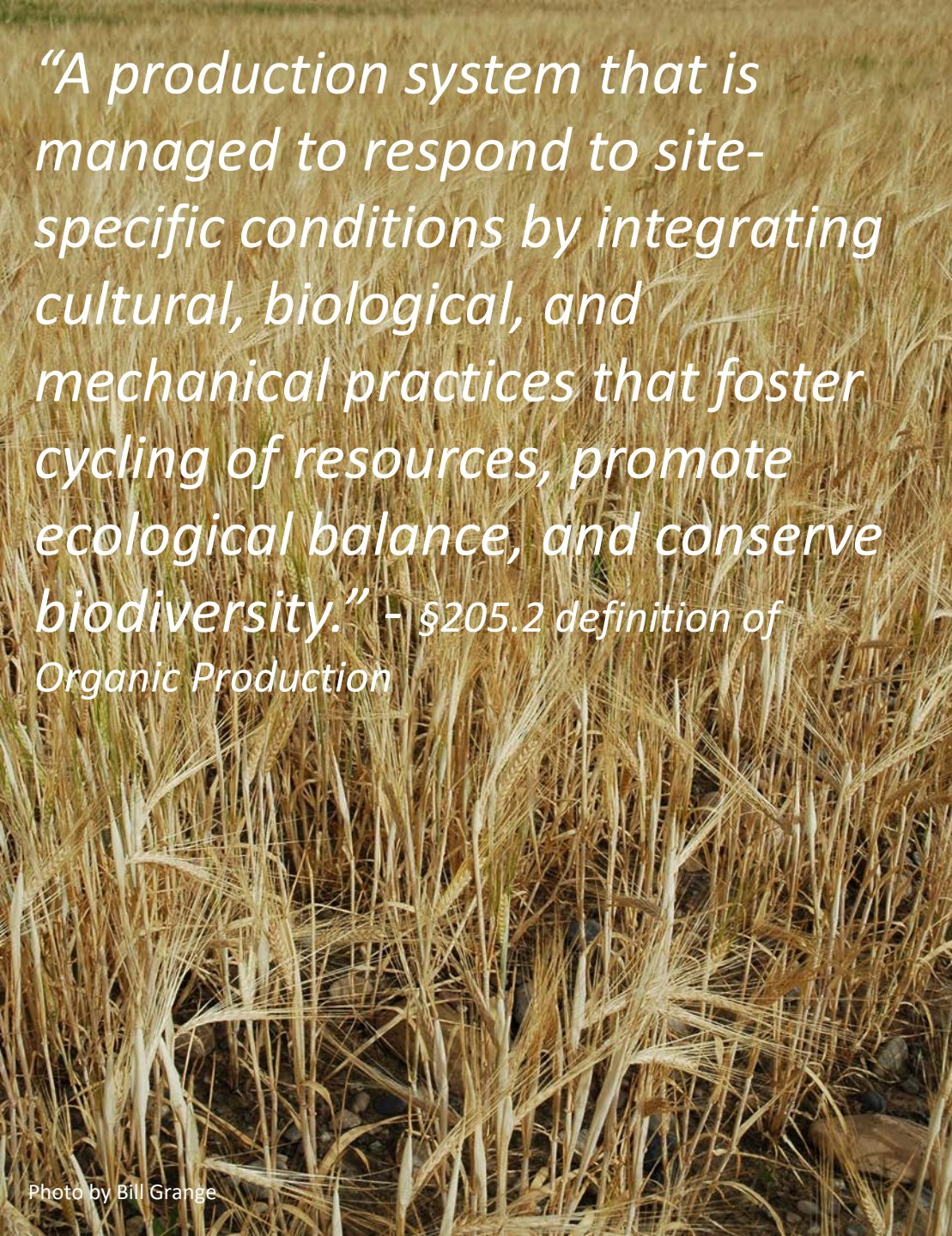
- All certifiers are required to give estimates for certification costs. It's ok to shop around!
- Most often there is an application fee and a separate fee for the inspection.
- Certified operations have to pay the certifier for the certification process.
- Fees vary depending on the certifier. Every certifier has a different method for calculating fees as well as different rates.

Sales	Base Fee	Graduated Fee	Total Fee	Sales	Base Fee	Graduated Fee	Total Fee
☐ \$0 – 2,000	\$125	\$10	<b>\$135</b>	☐ \$50,000 – 75,000	\$200	\$375	<b>\$575</b>
☐ \$2,001 – 5,000	\$125	\$25	<b>\$150</b>	☐ \$75,001 – 100,000	\$200	\$500	<b>\$700</b>
☐ \$5,001 – 10,000	\$125	\$50	<b>\$175</b>	☐ \$100,001 – 150,000	\$200	\$750	<b>\$950</b>
☐ \$10,001 – 15,000	\$125	\$75	<b>\$200</b>	☐ \$150,001 – 200,000	\$200	\$1,000	<b>\$1,200</b>
☐ \$15,001 – 20,000	\$200	\$100	<b>\$300</b>	☐ \$200,001 – 280,000	\$200	\$1,400	<b>\$1,600</b>
☐ \$20,001 – 25,000	\$200	\$125	<b>\$325</b>	☐ \$280,001 – 375,000	\$200	\$1,875	<b>\$2,075</b>
☐ \$25,001 – 30,000	\$200	\$150	<b>\$350</b>	☐ \$375,001 – 500,000	\$200	\$2,500	<b>\$2,700</b>
☐ \$30,001 – 35,000	\$200	\$175	<b>\$375</b>	☐ \$500,001 and up	\$200	0.5% up to 5,000	\$_____ *
☐ \$35,001 – 50,000	\$200	\$250	<b>\$450</b>				

\* If gross organic sales are greater than \$500,000.00, calculate and enter the total fee [base fee + (organic sales x 0.005)]. The maximum total fee is \$5,200.00.

**ISDA Inspection Fee** is \$35/hour for preparation, inspection, travel time, & report writing time.  
**Travel** is charged at \$0.58/mile to/from office and inspection location.  
**Application fee** is based on gross organic sales.





*“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.” - §205.2 definition of Organic Production*

# The Basics

- The “Big 3”
  - No Excluded Methods (“GMOs”)
  - No Ionizing Radiation
  - No Sewage Sludge (Biosolids)
- Limited Synthetic Substances Allowed
  - Only a handful of specific synthetic substances are allowed and are specifically listed in the Rule
- Detailed Recordkeeping Requirements
- Specific Labeling Requirements



# Crop Certification



Before you can begin certifying crops, all land must have had no prohibited substances applied for 3 years before harvest of first organic crop.

This 3-year period is called the “transition.”

You are not certified during this time, but you should start keeping records and treating the land as if it were organic.

When you are close to finishing the transition (~6 months), contact a certifier to begin the certification process.







# Crop Certification

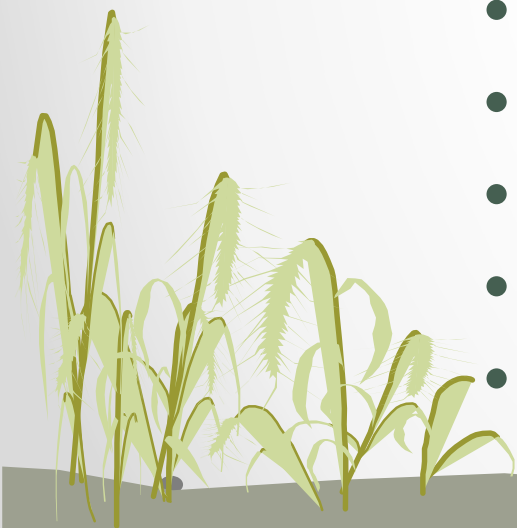
- Farms fill out a very long and detailed plan outlining all aspects/practices of the operation.
- Seeds have to be organic unless not commercially available.
- Monitor soil/crop fertility.
- Crop rotation requirements.
- Natural resources must be maintained or improved.
- All fields must have buffer zones to prevent contamination.
- Only approved inputs can be used.
- Must manage pests, weeds, and disease.
  - Prevention → mechanical → use of inputs  
(not just spray without doing other things)



# The Organic System Plan (OSP)-Crops

Organic producers must fill out an OSP and update it when anything changes. It is the document with all of the details about their organic operation.

- Section 1 – General Information
- Section 2 – Farm Plan Information
- Section 3 – Seeds and Seed Treatments
- Section 4 – Source of Seedlings and Perennial Stock
- Section 5 – Soil and Crop Fertility Management
- Section 6 – Crop Management
- Section 7 – Maintenance of Organic Integrity
- Section 8 – Record Keeping System



# Land Requirements (§205.202)

To produce a certified organic crop, land must:

1. Be managed organically;
2. Have had no prohibited materials applied for 36 months prior to harvest of the certified crop; and
3. Have distinct, defined buffers.





# Seeds and Planting Stock (§205.206)

Organic seeds must be used unless not commercially available.  
If non-organic seed use is deemed necessary, seeds **MUST** still adhere to organic guidelines:

**ANNUAL SEEDLINGS** must be organic

**PLANTING STOCK** : Commercial Availability rules apply, but any nonorganic sources must be under organic management for at least 12 months prior to first harvest of an organic crop



Use of GM seeds is prohibited



Seed may NOT be treated with prohibited materials

Organic growers must document seed/stock sources, invoices, seed tags, organic certificates, treatments, etc.



# Soil and Crop Fertility (§205.200, 205.203, & 205.205)



Soil Type and Nutrient Deficiencies  
(If Applicable)



Monitoring Fertility



Document Any and All Fertility  
Inputs

**Crop fertility must be managed on multiple levels. For example:**

- Farming Practices
- Cultural Practices
- Crop Selection
- Inputs

**Fertility inputs also have strict regulations and cannot contribute to contamination of crops, soil, or water.**



# Soil and Crop Fertility (§205.200, 205.203, & 205.205)

Animal Manures – May be from conventional operation, but ensure there is no contamination (herbicide/pesticide residue, etc.)



If crop is not for human consumption, compliant manure may be used without restrictions



If crop is for human consumption, and **CONTACTS** soil: Manure has a harvest day wait of **120** days prior to harvest



If crop is for human consumption, and **DOES NOT CONTACT** the soil: Manure has a day way of at least **90** days prior to harvest

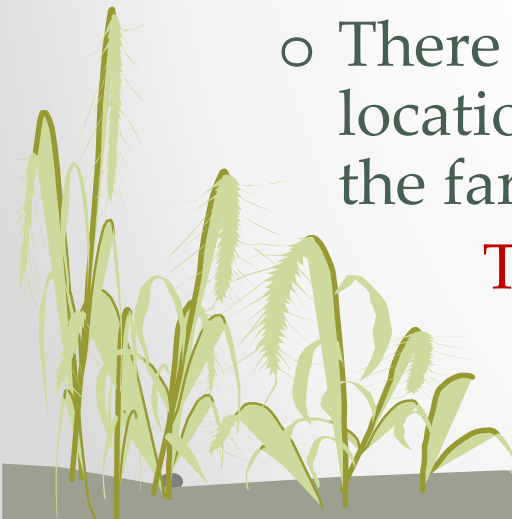


# Natural Resources Management

(§205.2 & 205.200)

- Natural resources of the operation - The physical, hydrological, and biological features of a production operation, including soil, water, wetlands, woodlands, and wildlife.
- The NOP Rule requires that all organic operations “must maintain or improve the natural resources of the operation, including soil and water quality.”
  - There are a wide variety of things a farm can do. A lot depends on the location and resources available to start with. What we want to see is that the farm is doing something and that they are striving for improvement.

**There are also several resources available to farmers to help them meet this requirement.**



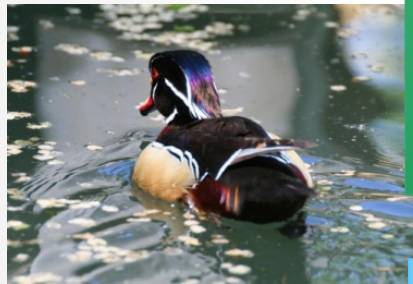
# Natural Resources Management



Identification of habitats and native species on or around your operation



Providing habitat and protecting existing habitat



Controlling Invasive Species

Soil Erosion and Fertility





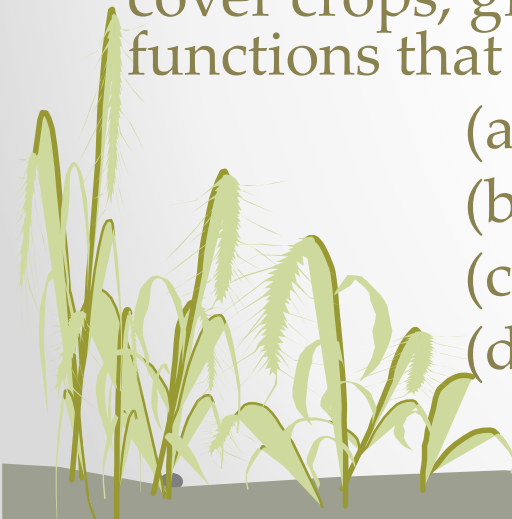
# Crop Rotation (§205.2, 205.203, 205.205, 205.206)

Definition: *Crop rotation*. The practice of alternating the annual crops grown on a specific field in a **planned pattern or sequence in successive crop years so that crops of the same species or family are not grown repeatedly without interruption on the same field**. Perennial cropping systems employ means such as alley cropping, intercropping, and hedgerows to introduce biological diversity in lieu of crop rotation.

## §205.205 Crop rotation practice standard.

The producer must implement a crop rotation including but not limited to sod, cover crops, green manure crops, and catch crops that provide the following functions that are applicable to the operation:

- (a) Maintain or improve soil organic matter content;
- (b) Provide for pest management in annual and perennial crops;
- (c) Manage deficient or excess plant nutrients; and
- (d) Provide erosion control.



# Crop Rotation

- ISDA has worked with other organic certifiers to create a “best practices” document for certifiers regarding crop rotation.
- Asking farmers to provide a much longer term rotation plan (5-10 years).
  - Looking at crop rotation from a larger lens to get a better picture of the whole system.
  - We know things may change and that’s ok, this is just a plan and it can be revised and changed as needed.
- Farmers are going to have to demonstrate how their rotation plan meets the requirements of §205.205.
  - There is no one specific way to do this. We are open to looking at any data or information you provide, but you have to have something.
  - We recognize that changes to soil don’t happen overnight, and that there are numerous other factors in play, so this is a long term process.





# Crop Rotation

- **Farmers may seek approval for alternative crop rotation plans that vary from the typical interruption after every annual crop.**
  - Alternative plans should be submitted to ISDA for approval before implementation.
  - These plans must show how §205.205 will be met.
- **If fallow is used as the interruption for the rotation, it must be >12 months.**
  - Ground can't be bare soil.
- **Remember that perennial crops are not totally exempt from everything!**
  - Employ means such as alley cropping, intercropping, and hedgerows to introduce biological diversity in lieu of crop rotation.
  - Still meet the requirements in §205.205.



# Buffers (§205.202)

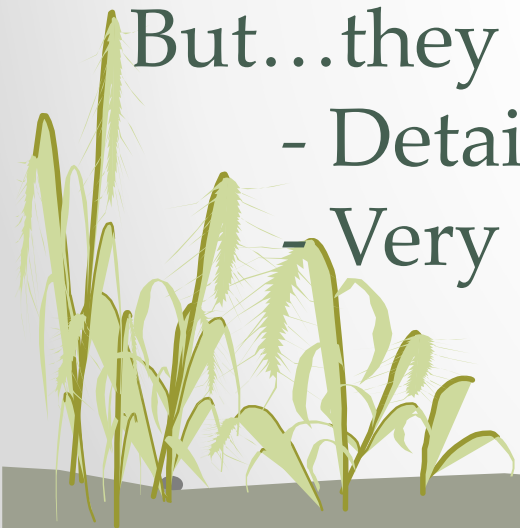
Any farm or field must have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management.

There is no specific size required in the NOP Rule.

But...they must be *adequate*.

- Details matter
- Very Situational

*What do you consider adequate?*





# Buffers

- Certified organic operations are responsible for determining their buffers
- Ideally they will make this determination through communication and cooperation with their neighbors and other entities that work on or near their farm
  - For Example: mosquito abatement, irrigation districts, county weed departments, aerial spray companies, transportation departments, utility companies, etc.



# Buffers

Prevent the unintended application of a prohibited substance to the crop.



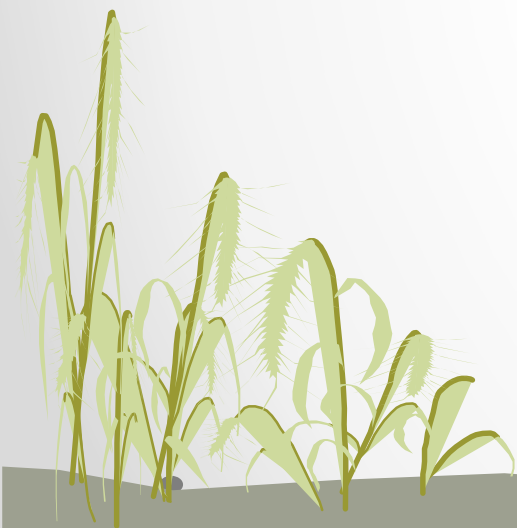
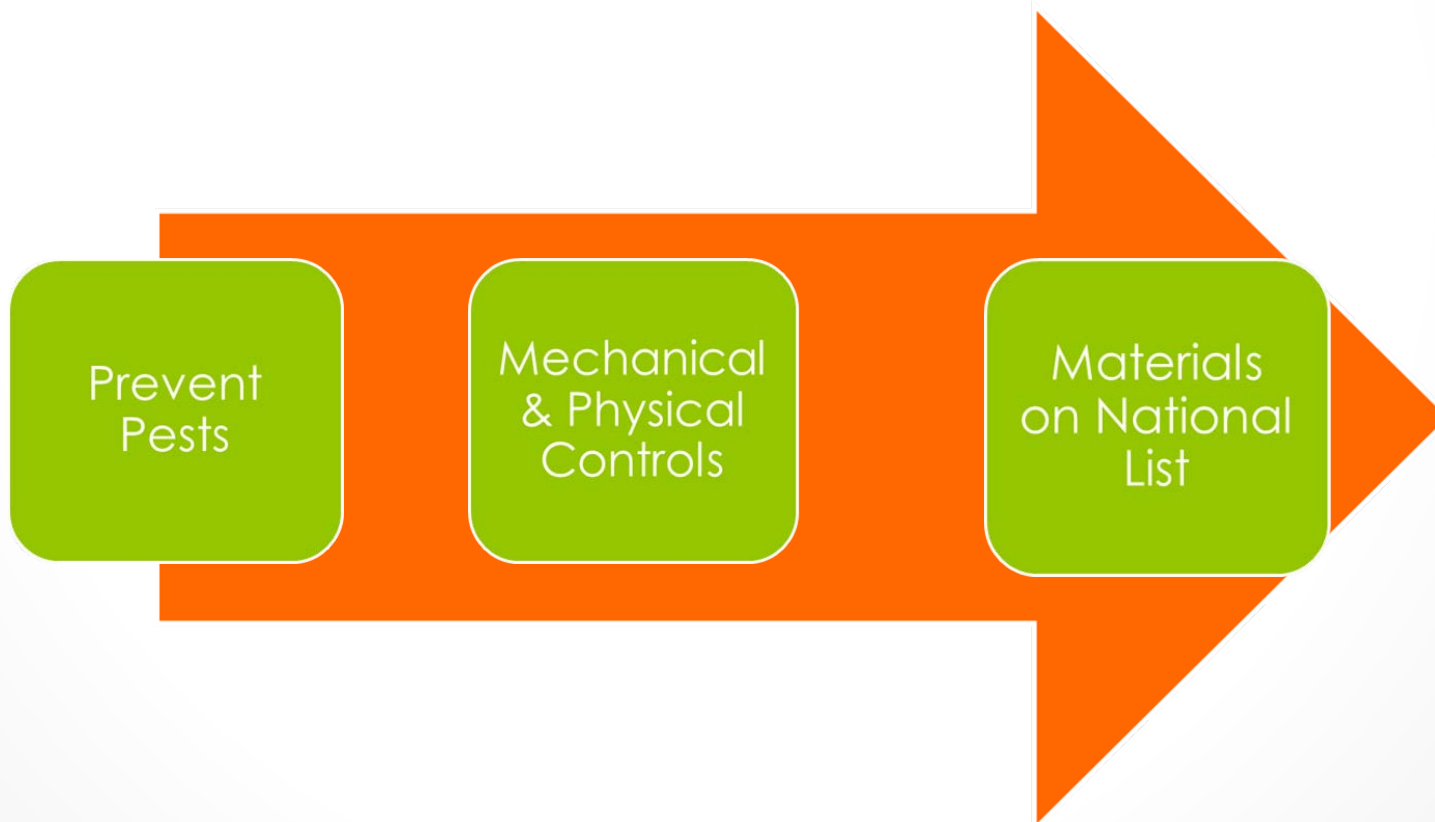


# Crop Pest, Weed, & Disease Management (§205.206)



# Pest, Weed, & Disease Management

*NOP Rule requires organic operations to manage pests & weeds!  
They are not exempt from other laws.*





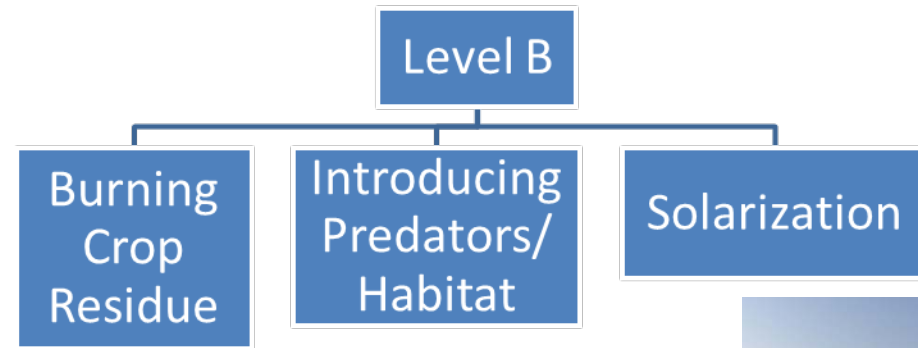
# Weed Management

§205.206(a) The producer must use management practices to prevent crop pests, weeds, and diseases including but not limited to [...]



# Pest & Disease Management

§205.206(a) The producer must use management practices to prevent crop pests, weeds, and diseases including but not limited to [...]



Use of Inputs, as allowed on National List

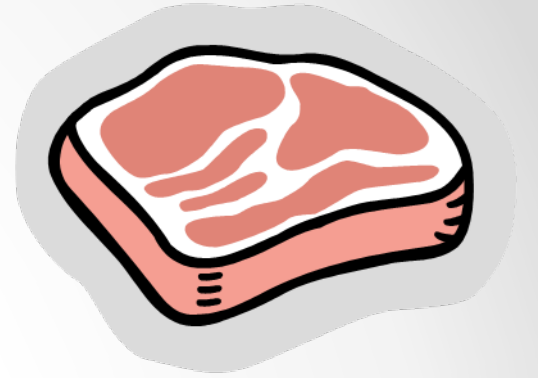




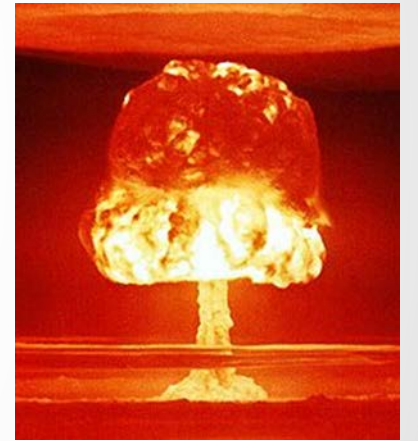
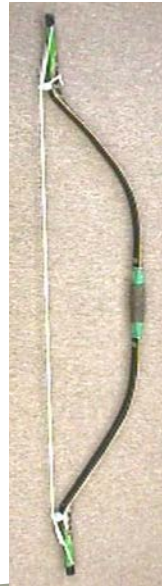
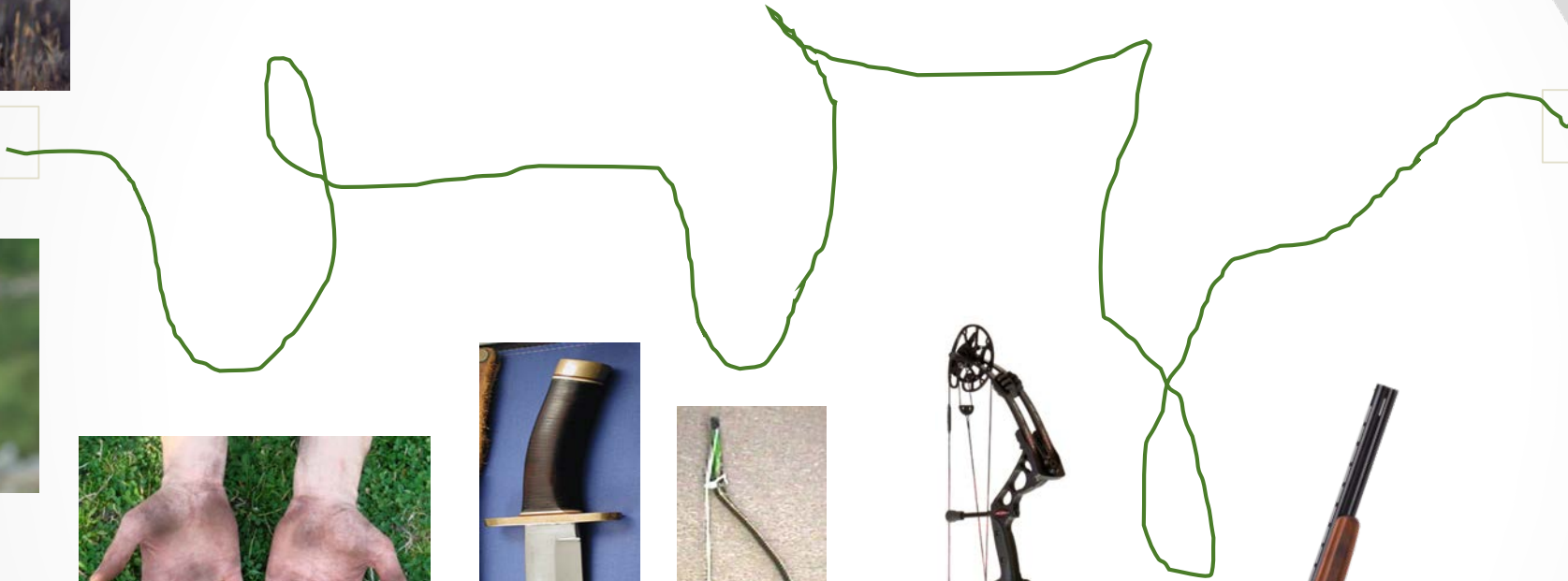


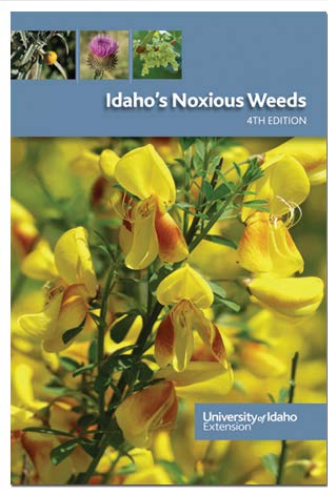
**POINT A**

# The Hunting Analogy: There are a lot of ways to get from Point A to Point B



**POINT B**



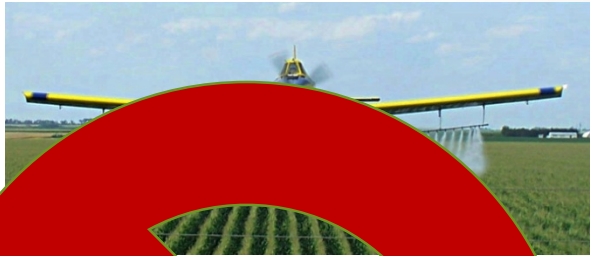
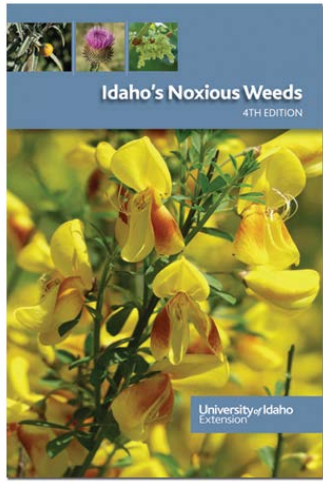


# Just as there are multiple ways to manage weeds and other pests





# Organic Producers just have a more limited tool belt



# Crop Pest, Weed, & Disease Management

## Level C

If pests, weeds, or disease cannot be managed through preventative, cultural or mechanical means sufficiently ...

*then* a biological or botanical substance or a substance listed on the National List of synthetic substances allowed for use in organic crop production may be applied, provided that conditions for use are documented in the operator's Organic System Plan. - §205.206(e)





# What Inputs are Allowed?

(§205.105, 205.601, 205.602)

**Natural/Nonsynthetic** products are **ALLOWED**, with some exceptions:

## Allowed with Restrictions

- Calcium Chloride
- Potassium Chloride
- Sodium Nitrate

## Prohibited

- Arsenic
- Lead Salts
- Manure ash
- Sodium fluoaluminate
- Strychnine
- Sewage Sludge (Biosolids)
- Tobacco Dust
- GMO products
- Rotenone

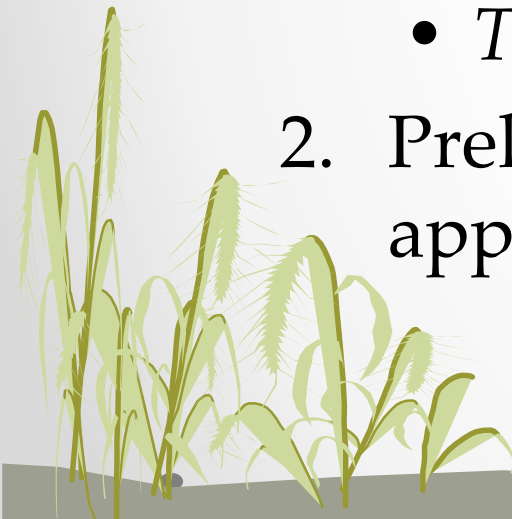


# What Inputs are Allowed?

(§205.105, 205.601, 205.602)

**Synthetic** products are NOT ALLOWED, with some exceptions:

1. If it is on the National List (§205.601)
  - *There are a significant number of items on this list*
2. Preliminary requirements and restrictions are met, as applicable





All Inputs Must Be Reviewed & Approved

# Crop Inputs

Allowed **synthetic** examples (*note there are many details and restrictions involved*):

- Sanitizers: Ethanol, Isopropanol, Chlorine, Hydrogen Peroxide, Peracetic Acid, etc.
- Herbicide/weed barrier: Soap-based (only on perimeters or ornamentals), Mulches (recycled paper, plastic mulch that is removed at end of growing season).
- Insecticides: Boric Acid, elemental sulfur, horticultural oil, insecticidal soaps, etc.
- Disease Control: Fixed copper & copper sulfate, hydrated lime, hydrogen peroxide, horticultural oils, peracetic acid, lime sulfur, elemental sulfur, aqueous potassium silicate, potassium bicarbonate.
- Plant/Soil Amendments: Aquatic plant extracts, humic acids, micronutrients (zinc, iron, manganese, etc.), Vitamins B1, C & E, lignin sulfonate, etc.
- Predator Control: Vitamin D3 rodenticide, pheromones, ferric phosphate, etc.
- Pesticide Inerts: EPA List 4, EPA List 3 (pheromones only)



Certifiers

**NOTE:** Because a substance is listed on the National List of Allowed Substances, it does not necessarily mean the product is always allowed!

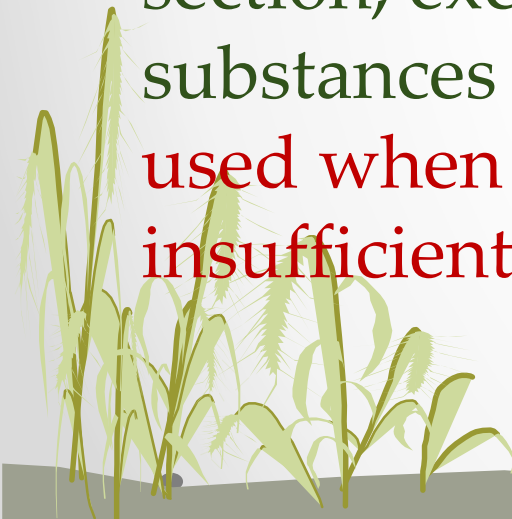




# Example: Copper Sulfate

**§205.601 Synthetic substances allowed for use in organic crop production.**

In accordance with restrictions specified in this section, the following synthetic substances may be used in organic crop production: *Provided*, That, use of such substances do not contribute to contamination of crops, soil, or water. Substances allowed by this section, except disinfectants and sanitizers in paragraph (a) and those substances in paragraphs (c), (j), (k), and (l) of this section, **may only be used when the provisions set forth in §205.206(a) through (d) prove insufficient to prevent or control the target pest.**



# Example: Copper Sulfate

## §205.601 Synthetic substances allowed for use in organic crop production.

(a) As algicide, disinfectants, and sanitizer, including irrigation system cleaning systems [...]

(3) Copper sulfate—for use as an algicide in aquatic rice systems, is limited to one application per field during any 24-month period. Application rates are limited to those which do not increase baseline soil test values for copper over a timeframe agreed upon by the producer and accredited certifying agent.

OR

(i) As plant disease control [...]

(3) Copper sulfate—Substance must be used in a manner that minimizes accumulation of copper in the soil.

OR

(j) As plant or soil amendments [...]

(6) Micronutrients—not to be used as a defoliant, herbicide, or desiccant. Those made from nitrates or chlorides are not allowed. Soil deficiency must be documented [...]

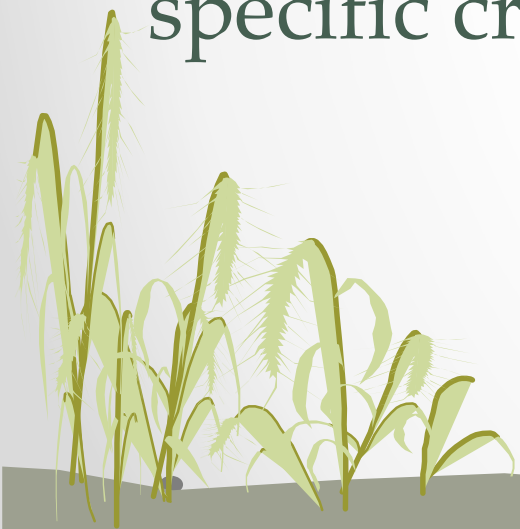
(ii) Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt.



# Example: Copper Sulfate

All of that and we haven't even talked about additives or inert ingredients that may be present in the product!

*ALL* ingredients need to be reviewed and each may have specific criteria.



# Material Approval

- You cannot always trust a salesperson or a label that claims that the product is ok for use on an organic operation!
- Certified operations are instructed to have all materials approved by ISDA (or other certifier) or OMRI, WSDA, or CDFA before use.
- A prohibited material application could remove a field from organic certification for 3 years.
- Never assume or guess about a product's acceptability!

**ALWAYS TALK TO YOUR CERTIFIER BEFORE  
USING AN INPUT PRODUCT!!!!!!!!!!!!!!**





# Livestock Practices

Livestock Operations also fill out a very long and detailed plan outlining all of the details of their operation.

- General Information
- Livestock Inventory
- Origin of Livestock
- Feed, Feed Supplements, & Water
- Living Conditions
- Pasture
- Manure Management
- Health Care Practices
- Pre-Slaughter Management
- Milk / Egg / Fiber Collection
- Animal Identification
- Record Keeping System







## Livestock Practices

- Animals for meat or fiber must be born organic (mother managed organically from last 1/3 of pregnancy/gestation).
- Poultry must be managed organically from 2<sup>nd</sup> day of life.
- Dairy animals must be born organic or spend 1 year being treated as organic before milk can be considered organic.





# Livestock Practices

- Must be fed organic feed.
- No hormones allowed to promote growth.
- No antibiotics allowed.
- Must have access to outdoors.
- Must have appropriate living conditions that accommodate health and natural behaviors (e.g. freedom of movement, exercise, reduction of stress, shelter).
- Limited physical alterations allowed which are for animal's welfare and done in a manner that reduces pain and stress.



# Livestock Practices

- Very specific rules around pasture management and access.
- Ruminant animals must graze on pasture during the grazing season and get at least 30% of feed from pasture during this time.
- Natural resources must be maintained or improved.
- Only approved inputs can be used (e.g. healthcare products, management tools, etc.).





All Inputs Must Be Reviewed & Approved

# Livestock Practices - Inputs



**Natural/Nonsynthetic** products are **ALLOWED**, with one exception (strychnine).

**Synthetic** products are **NOT ALLOWED**, with some exceptions (if it is specifically listed in the Rule and all requirements & restrictions are met).



Some Examples (*note there are many details and restrictions involved*):

- Medical Treatments: Aspirin, atropine, vaccines, butorphanol, activated charcoal, chlorhexidine, electrolytes, flunixin, iodine, magnesium sulfate, mineral oil, fenbendazole, etc.
- Disinfectants/Sanitizers: Ethanol, isopropanol, chlorine, phosphoric acid, etc.
- Topical Treatments: Copper sulfate, elemental sulfur, iodine, lidocaine, hydrated lime, mineral oil, procaine, sucrose octanoate esters, zinc sulfate, etc.
- Feed Additives: FDA approved trace minerals & vitamins, DL-Methionine (poultry).
- Excipients & Inerts: FDA GRAS, FDA food additive, NADA, APHIS, and EPA List 4.



**Certifiers**

*Animals cannot be denied needed treatment in order to keep their organic status. If their life or wellbeing requires a prohibited treatment, it must be given and the animal then is removed from its organic status and is considered conventional from then on.*

# Grazing Season Clarification

§205.2, 205.237, 205.239, 205.240

For our purposes, “grazing season” is the length of time over which ruminant animals get an average of *at least 30%* dry matter from pasture. This is different than access to pasture, which could be all year long in some areas.

Ruminant animals must be grazed throughout the entire “grazing season” for the geographical region, which shall be not less than 120 days per calendar year. Due to weather, season, and/or climate, the grazing season may or may not be continuous.

Producers must be able to show how they determined the length of their “grazing season.”

120 days is not the low bar to meet.

Producers must graze for the full grazing season for their geographical location.





# Handling Practices

- *Handler* - any operation or portion of an operation (except final retailers of agricultural products that do not process agricultural products) that receives or otherwise acquires agricultural products and processes, packages, or stores such products.
- *Processing* - Cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container.



# Handling Practices

Handling Operations also fill out a very long and detailed plan (OSP) outlining all of the details of their operation.

- General Information
- Labeling
- Product Composition
- Assurance of Organic Integrity
- Equipment & Sanitization
- Packaging & Storage
- Transportation
- Pest Management
- Record Keeping System





# Handling Practices

- Handlers must prevent contamination or commingling with prohibited substances or non-organic products.
- Control pests through prevention, mechanical & physical controls, then inputs.
- Ensure only allowed ingredients and processing aids are put in organic products.
- Get all recipes, ingredients, and labels approved by their certifier.



# §205.301 Product Composition

**(a)**

- 100% Organic

All agricultural ingredients and processing aids must be certified organic

**(b)**

- “Organic” (>95%)

95% of product must be certified organic agricultural products

**(c)**

- “Made With Organic Ingredients”

At least 70% certified organic produced ingredients

**(d)**

- <70% Organically Produced Ingredients

Only use “organic” on ingredient statement

**(e)**

- Organic Livestock Feed

also see §205.237

*\*Percentages determined by weight or volume, excluding water and salt.*



All Inputs Must Be Reviewed & Approved

# Handler Practices - Inputs

Only certain non-organic items can contact certified “organic” food.

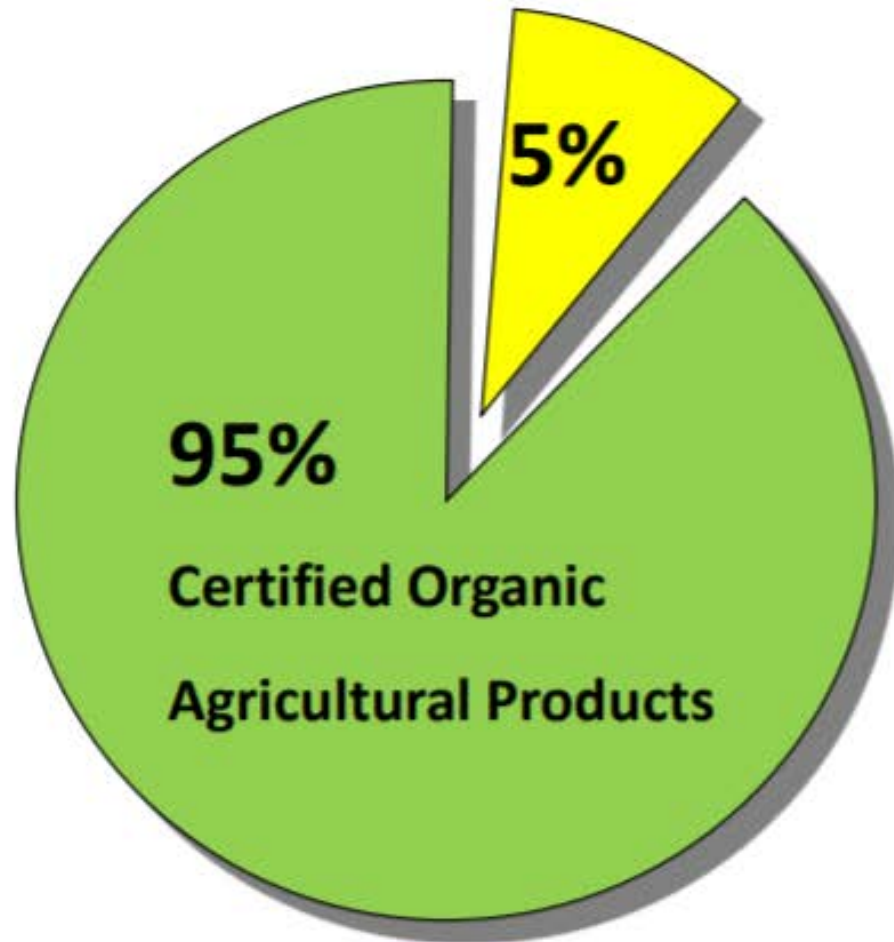
Some Examples (*note there are many details and restrictions involved*):

- Nonsynthetic non-agricultural: Citric & Lactic acids, agar-agar, animal enzymes (rennet), calcium carbonate, enzymes, natural flavors, microorganisms, nitrogen, oxygen, potassium chloride, sodium bicarbonate, tartaric acid, etc.
- Synthetic non-agricultural: Activated charcoal, ammonium bicarbonate & carbonate, ascorbic acid, calcium citrate, calcium hydroxide, calcium phosphates, carbon dioxide, chlorine materials, ethylene, glycerin, hydrogen peroxide, nutrient vitamins & minerals, silicon dioxide, tocopherols, xanthan gum, etc.
- Agricultural non-organic (*only if organic version cannot be obtained*): Intestinal casings, celery powder, colors from agricultural products (beet juice extract color, carrot juice color, etc.), fish oil, fructooligosaccharides, gelatin, gums (Arabic, guar, etc.), kelp, lecithin, pectin, cornstarch, whey protein concentrate, etc.



Certifiers

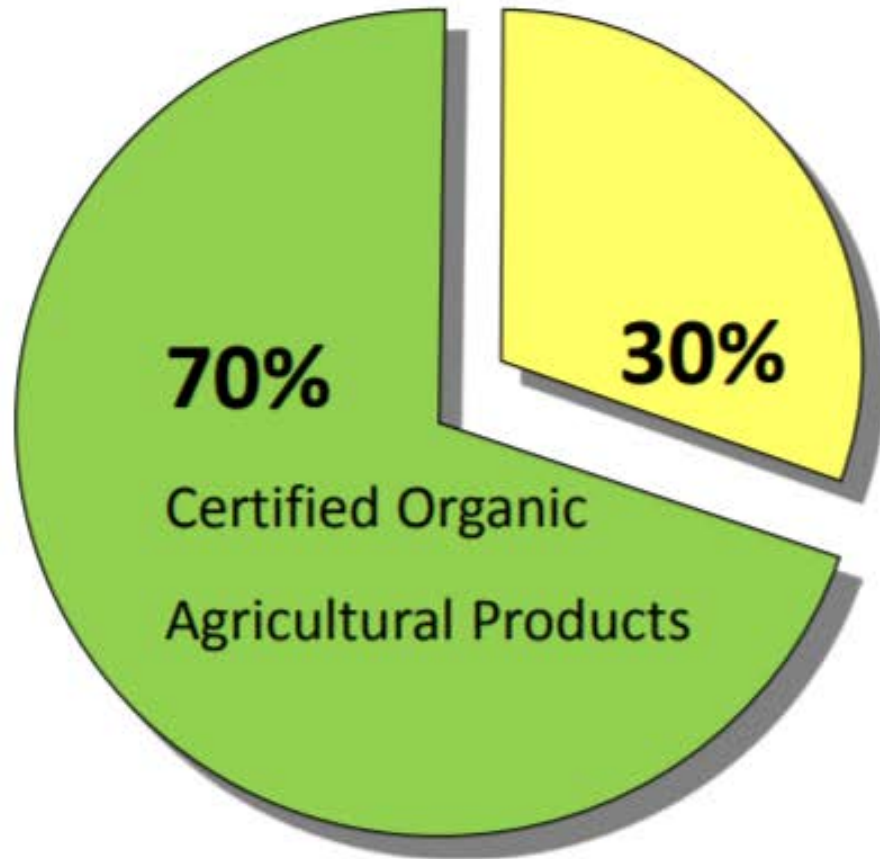
# Product Composition- “Organic”



- 5% may be:
  - Substances from 205.605
  - Non-organic agricultural products from 205.606 that are not commercially available in organic form.
  - No excluded methods, sewage sludge, or irradiation.



# §205.301 “Made with Organic [specified ingredients or food groups]”



- 30% may be any nonorganic agricultural ingredient /product produced without excluded methods, sewage sludge, or irradiation.

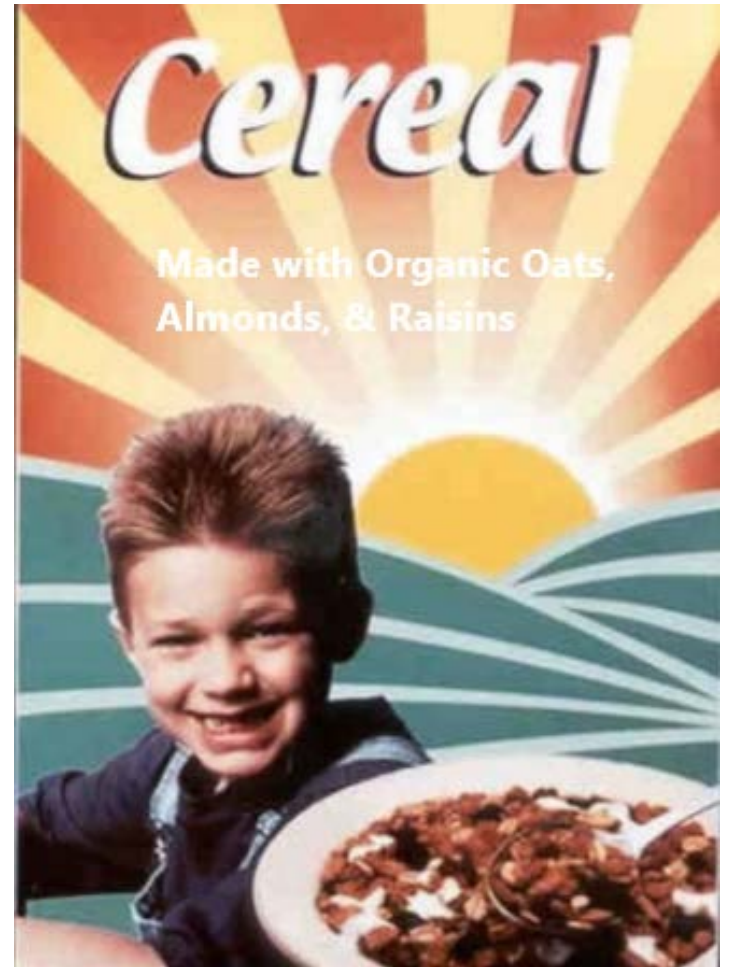
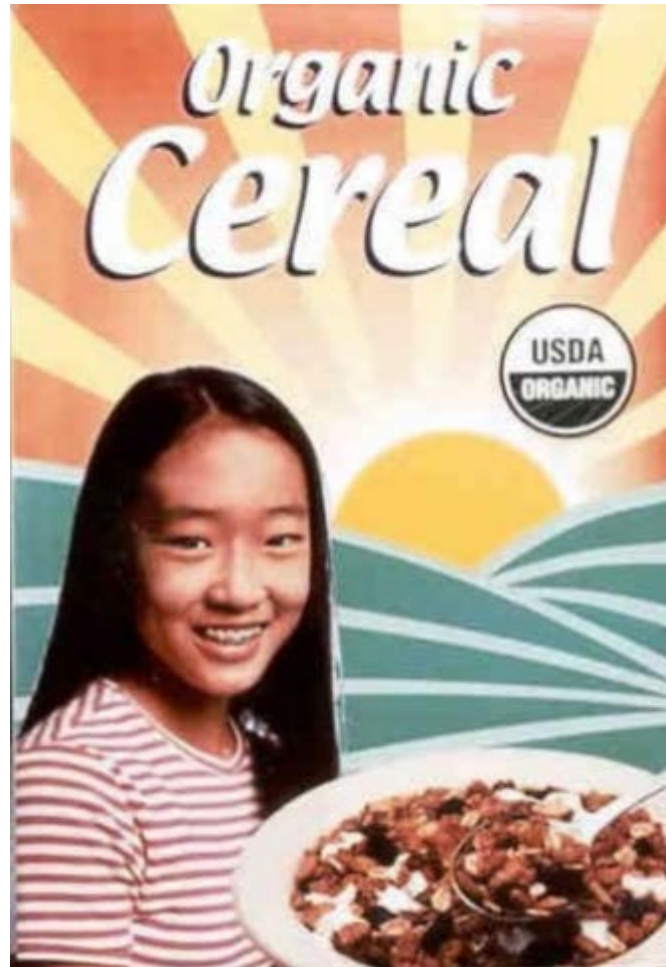
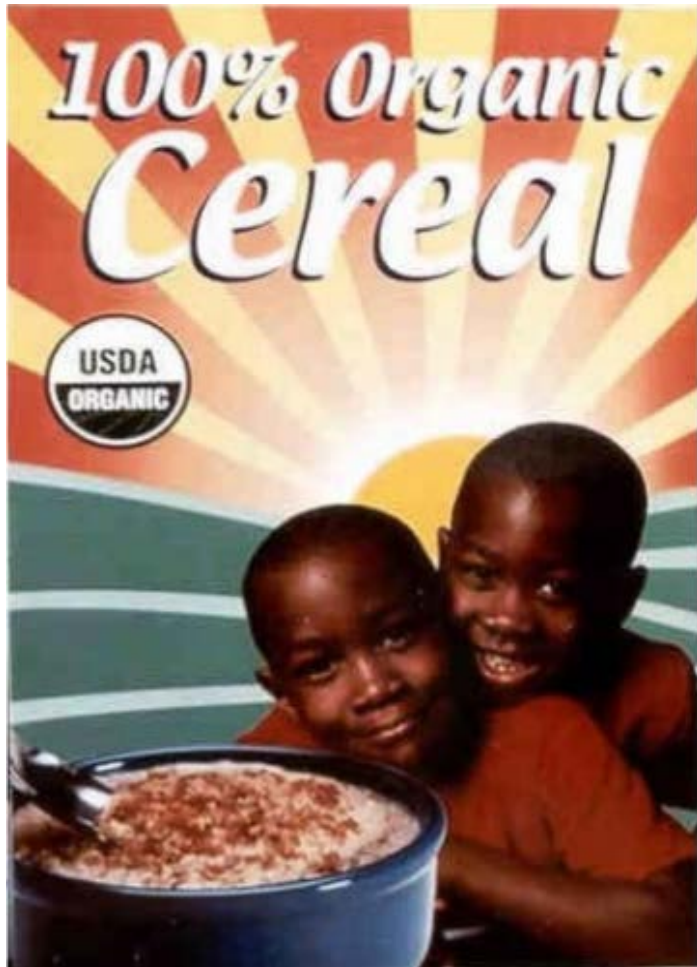
# Labeling

100% Organic	Organic	Made with Organic
<ul style="list-style-type: none"><li>• <u>May</u> say “100% Organic” or “Organic”</li><li>• <u>May</u> use USDA seal</li><li>• <u>May</u> display Certifier’s logo<ul style="list-style-type: none"><li>• Not more prominent than NOP seal</li></ul></li><li>• <u>May</u> make percentage claim<ul style="list-style-type: none"><li>• Note size restriction</li></ul></li></ul>	<ul style="list-style-type: none"><li>• <u>May</u> say “Organic”</li><li>• <u>May</u> use USDA seal</li><li>• <u>May</u> display Certifier’s logo<ul style="list-style-type: none"><li>• Not more prominent than NOP seal</li></ul></li><li>• <u>May</u> make a percentage statement:<ul style="list-style-type: none"><li>• Percentage statement must not exceed ½ the size of the largest type on the panel.</li><li>• Must be entirely the same type, style, size, and color, without highlighting.</li></ul></li></ul>	<ul style="list-style-type: none"><li>• <u>May</u> list up to 3 ingredients or food groups</li><li>• <u>Cannot</u> use USDA seal</li><li>• <u>May</u> display Certifier’s logo</li><li>• <u>May</u> make a percentage statement:<ul style="list-style-type: none"><li>• Percentage statement must not exceed ½ the size of the largest type on the panel.</li><li>• Must be entirely the same type, style, size, and color, without highlighting.</li></ul></li></ul>

**For all three labeling categories, retail labels MUST include the following:**

- “Certified Organic By...” statement below handler/distributor contact info.
- Identify all organic ingredients as organic in the ingredient declaration statement.





**All of these labels should have the following on the other part of the label:**

Distributed By: Organic Cereal Co.  
100 Organic St., Boise, ID

Certified Organic by ISDA

# Labeling

*If it is confusing you can always just look at the ingredient statement to know what is in the product.*



**INGREDIENTS:** Organic rolled oats, organic sunflower oil, organic cinnamon, salt



**INGREDIENTS:** Organic rolled oats, organic sunflower oil, organic cinnamon, salt, natural vanilla flavor



**INGREDIENTS:** Organic rolled oats, organic almonds, organic raisins, sunflower oil, organic cinnamon, salt, natural vanilla flavor



# Recordkeeping (§205.103)



RECEIPTS (Seeds, Fertilizers, Herbicides etc)

Seed Packages And Labels



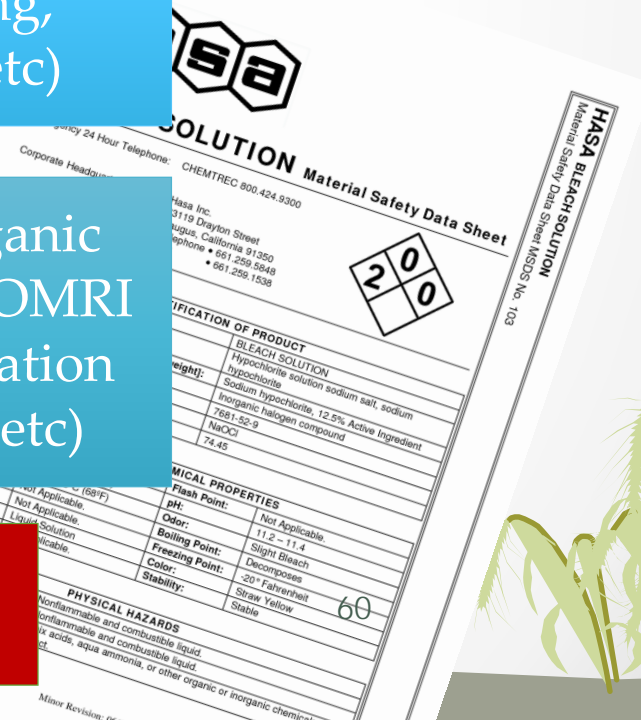
Land Documents – Field History, Land Affidavits

Farm Activity Logs (Cleaning, Planting, Cultivating, Harvest, etc)



Sales Information and Inventory

Inputs (Organic Certificates, OMRI certs, application schedules, etc)



**RECORDS MUST BE KEPT FOR AT LEAST 5 YEARS**

# Recordkeeping

## Records must:

- Be adapted to business
- Be auditable
- Maintained for 5+ years
- Demonstrate compliance with rules

\*If you say you are going to keep it,  
You had better keep it. \*



## Audits are required:

### Trace back

Verifies that the recordkeeping system can effectively track product from inputs through production and sale.

### Mass balance

Verifies that the production and sales of a product are reasonable for the quantity of inputs received.





# Exit Interview & What is an “Issue Of Concern”?

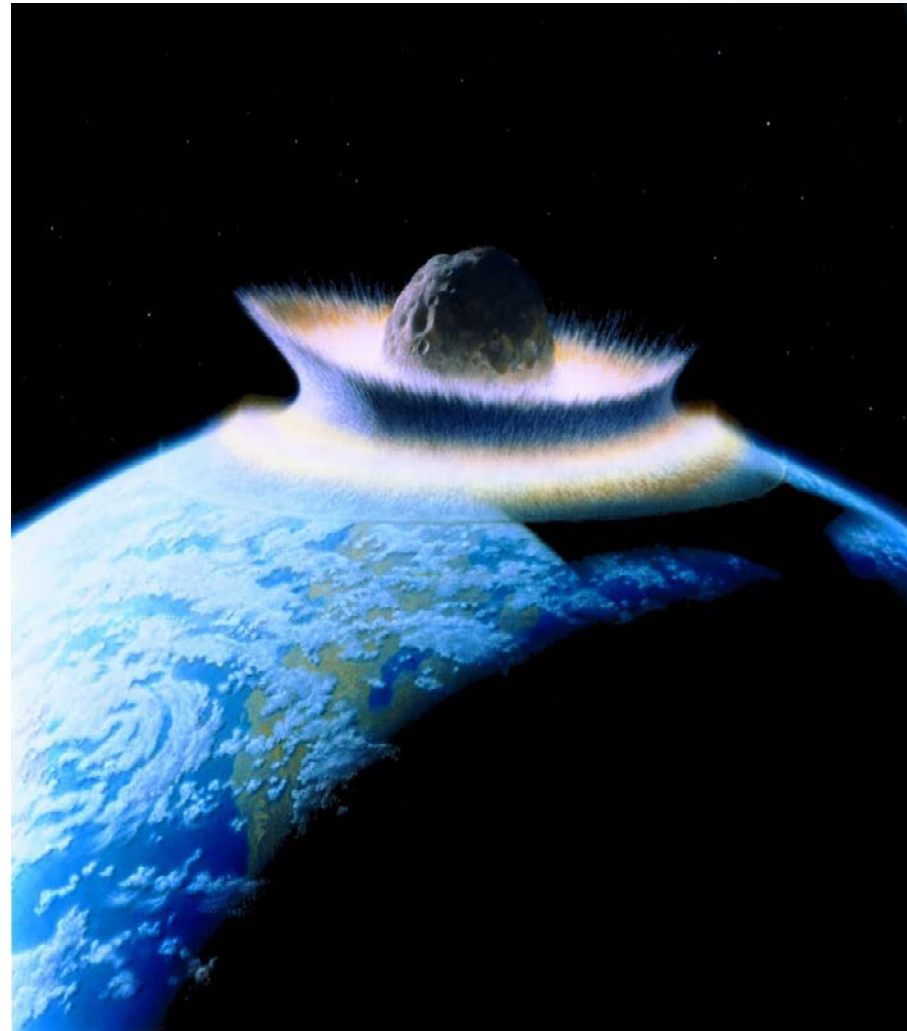
Each inspection ends with an “Exit Interview” to discuss any issues of concern noted on the inspection.

An observation on inspection is something that appears to be out of compliance with a requirement of the regulation or inconsistent with the OSP or plan submitted.

If you receive an “issue of concern” -  
the world has not come to an end!



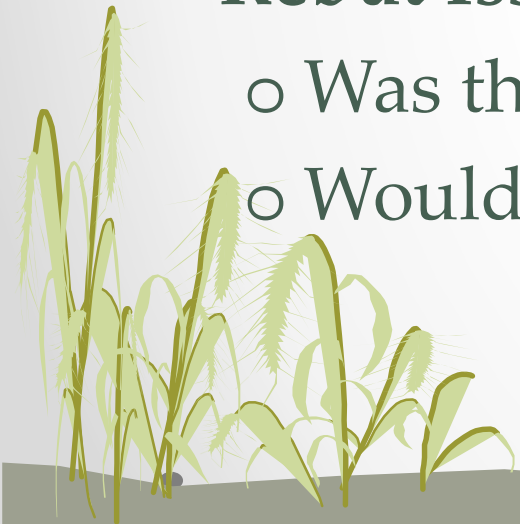
# Things that are world ending





# Issue of Concern...Now What?

- **Collect information to correct issue of concern.**
  - Records?
  - Corrective Action?
- **Rebut Issue of Concern**
  - Was the issue invalid? (Really?)
  - Would additional explanation resolve the issue?



# Submit Corrective Actions to ISDA

- Copy your Exit Interview
  - Number your corrective actions/resolution submittals
  - Put your operation name on submitted documentation
  - Mail or email information to ISDA as soon as possible.
    - DON'T Wait for us to contact you if you want your certificate turned around quickly!
  - If you don't get us corrective actions after the inspection, you will likely get a letter from us and will have to submit it by a certain deadline.



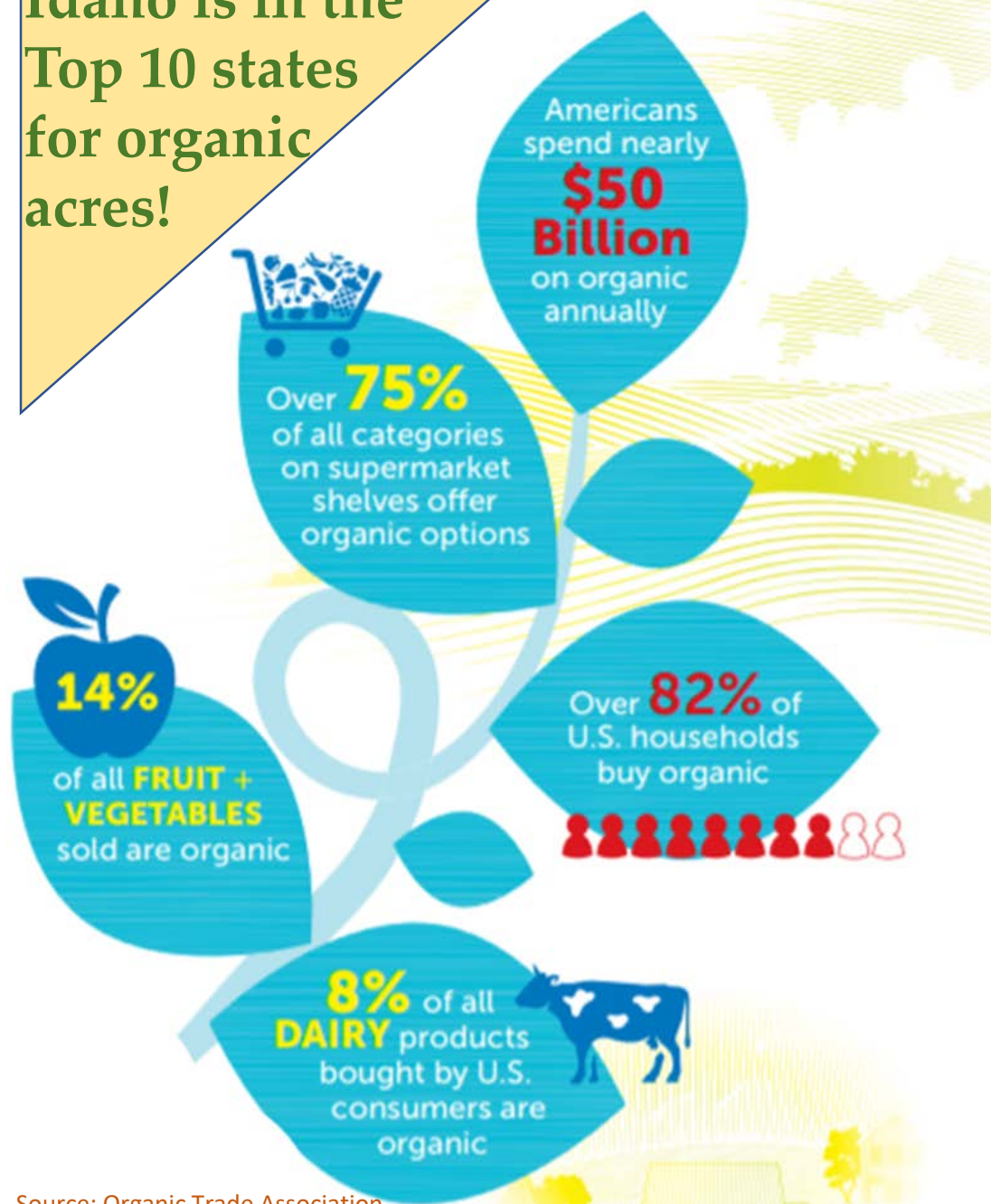


# International Trade

- Organic producers are responsible for ensuring that traceback documentation is available for all organic goods, including imported organic goods, linking their operation to the last certified organic operation.
- Operations directly importing organic product, or purchasing product through an uncertified broker, will need to supply additional import documents. Examples include:
  - NOP Import Certificate
  - Customs & Border Protection Forms
  - Phytosanitary Certificates, USDA APHIS Import Permits
  - Transaction Certificates
  - Invoices, BOLs, Waybills, etc.



Idaho is in the  
Top 10 states  
for organic  
acres!



## Questions?

If you want more information there are many resources available! Just search the internet for your topic of interest. Here are a few examples:

- USDA NOP website
- The Actual Regulation (e-CFR): Title 7, Part 205
- OMRI (for input information)
- National Sustainable Agriculture Information Service (ATTRA)
- eOrganic
- Rodale Institute
- Organic Trade Association

**THANKS FOR YOUR INTEREST IN ORGANIC FOOD & AGRICULTURE!**