NOP Certification & Organic Certification Resources for Agents

SRSFC Agent Training 2005

Richard Boylan, Area Agent
Alternative Agriculture
NCA&T State University

College of Agriculture and Life Sciences, NC State University
School of Agriculture and Environmental Sciences,
NC A&T State University

Organic Production – Conceptual Framework

- “Organic production” is defined by the 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.”

NOP – The time & space factors…

- PAST - 3 years (36 months prior to harvest) with no application of prohibited materials (no synthetic fertilizers, pesticides, or GMOs) prior to certification
- PRESENT - distinct, defined boundaries for the operation
- FUTURE - implementation of an Organic System Plan, with proactive fertility systems; conservation measures; and environmentally sound manure, weed, disease, and pest management practices

NOP – Regulation In Brief

- Proactive management practices must be implemented prior to use of approved inputs.
- Grower can use natural inputs unless they are specifically prohibited by NOP (e.g.- tobacco dust).
- Grower must avoid use of synthetic inputs unless they are specifically allowed by NOP (e.g.- horticultural oils for insect control).

More on NOP reg's…

- Grower must keep comprehensive records of farm operations.
- Grower (> $5,000 gross organic sales) must obtain & maintain certification on eligible ground. Any ingredients used in products to be labeled as organic must come from farms that are certified, regardless of gross sales.

NOP – Recordkeeping Requirements

- All operations producing and/or selling organic products must keep records to verify compliance with the regulation. Such records must:
  - be adapted to the particular operation
  - fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood
  - be maintained for at least 5 years beyond their creation
  - be sufficient to demonstrate compliance with the regulation. The operator must make the records available for inspection
- Certifiers will usually provide a grower with the forms they require

NOP – Fertility Inputs

- Manures from conventional systems are allowed in organic production; this includes manure from livestock grown in confinement and from those that have been fed genetically engineered feeds.
- Manure sources containing excessive levels of pesticides, heavy metals, or other contaminants may be prohibited from use. Certifiers may require testing for these contaminants if there is reason to suspect a problem.
- Other fertility inputs – mined materials, vegetable matter, composts, blood meal, bone meal and tankage are options.

NOP Fertility – More on manures

- **You may *not* apply raw, uncomposted livestock manure to food crops unless it is:**
- **A) incorporated into the soil a minimum of 120 days prior to harvest when the edible portion of the crop has soil contact.** Examples include strawberries and untrellised brambles. Any harvestable portion of a crop that can be splashed with soil during precipitation or irrigation might be considered to have soil contact.

OR

- **B) incorporated into the soil a minimum of 90 days prior to harvest of all other food crops.**
  - *Incorporation* is generally assumed to mean mechanical tillage to mix the manure into the soil.

NOP – Small Fruit Planting Stock

- Organic growers must make certain that the seeds, transplants, and planting stock they use are not genetically engineered.
- Organically-grown planting stock is encouraged.
- Non-organically produced planting stock to be used to produce a perennial crop may be sold, labeled, or represented as organically produced only after the planting stock has been maintained under a system of organic management for a period of no less than 1 year.

Certification – Planning for Weed & Pest Control

- §205.206—the Crop Pest, Weed, and Disease Management Practice Standard—requires that producers use a three-level hierarchical approach in deciding how to deal with these problems. This can most easily be explained by designating these levels A, B, and C.
- Level A: The first line of defense in managing weed, insect, and disease pests generally comprises the most sustainable and systems-based practices. Level A practices specifically include:
  - crop rotation and nutrient management [§205.206(a)(1)]
  - sanitation measures to remove disease vectors, weed seeds, etc. [§205.206(a)(2)]
  - cultural practices such as resistant or tolerant varieties, timing of planting, etc. [§205.206(a)(3)]

Further Weed Control Measures

- Level B: Level B is the second line of defense, to be chosen if level A measures are not sufficient to control the weed, insect, or disease problem. Level B practices generally include mechanical and physical practices that are traditional in organics, and the use of nonsynthetic or “natural” materials.
- Level B weed control options include:
  - mulching with fully biodegradable materials [§205.206(c)(1)]
  - mowing [§205.206(c)(2)] and grazing [§205.206(c)(3)]
  - cultivation and hand weeding [§205.206(c)(4)]
  - flame, heat, or electrical weeding [§205.206(c)(5)]
  - plastic mulches [§205.206(c)(6)]

Further Insect & Disease Control Measures

- Level B insect/animal pest control options include:
  - introducing or augmenting predators and parasites [§205.206(b)(1)]
  - developing habitat for beneficial predators and parasites [§205.206(c)(2)]
  - nonsynthetic lures, traps, and repellents [§205.206(c)(3)]
- Level B crop disease control options include:
  - management practices (e.g. fire, flooding) [§205.206(d)(1)]
  - application of nonsynthetic biological, botanical, or mineral inputs [§205.206(d)(2)]

The third line of defense against insects and disease

- Level C: to be chosen if the level of pest control required is not achieved after A and B control options are applied [§205.206(e)].
- In such instances, you are allowed the wider use of biologicals and botanicals to control pests. You also have the option to use those materials included on the National List under §205.601—“Synthetic substances allowed for use in organic crop production”.
- If you anticipate the need for level C control measures, be sure that you indicate this in your Organic Plan. Be specific about the control materials you might be using. Outline the indicators or thresholds you monitor that will trigger the use of those materials.

Certification – Finding a Certifier

- Any certifier accredited by the USDA can certify anywhere in the country. However a local certifier may be more familiar with the challenges that local growers face (i.e.- dry-land certifiers may not see the disease pressure that NC growers face).

- The location of the inspectors used is an issue. Some certifiers may require that you use inspectors that are not located near you. You will have to pay their travel expense, so this can have a major impact on your cost.

Certification – Issues to consider

- **Price**
  The USDA does not regulate fees for certification.
  Some certifiers charge a flat rate based on acreage.
  Shop around and see what works for you.
  Remember to factor in inspector costs.

- **Turn-around Time**
  Minimum of 3 to 4 months for the first time applying for certification.

References & Resources

- Growing Small Farms Website: www.ces.ncsu.edu/chatham/ag/SustAg/
- NCAT Organic Crops Workbook: www.attra.org/attra-pub/PDF/cropsworkbook.pdf
- USDA National Organic Program: www.ams.usda.gov/nop

More References & Resources

- Organic Materials Review Institute: www.omri.org
- SARE on transitioning to Organic: www.sare.org/publications/organic/index.htm
- CFSA: www.carolinafarmstewards.org
- New Farm (Rodale Institute): www.newfarm.org