



# OEFFA Organic Certification Fact Sheet

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## Sourcing Seeds and Plants for an Organic Farm

All certified organic growers must put forth a good-faith effort to source organic seeds for their operation. However, the NOP does allow producers to use nonorganic, untreated and non-GMO seeds and planting stock with documentation of an adequate seed search and verification of the untreated and non-GMO status of the seeds or planting stock. These exceptions do not apply to annual seedlings. Nonorganic perennials may be used if they are managed organically for one year before any crop produced by them is marketed as organic. Increased demand for certified organic seed with your seed dealers will encourage them to have additional crops and varieties available in organic form.

### NOP Citation & Definitions

§205.204(a) is the Seeds and Planting Stock Practice Standard.

*Annual Seedling* - A plant grown from seed that will complete its life cycle or produce a harvestable yield within the same crop year or season in which it was planted.

*Planting Stock* - Any plant or plant tissue other than annual seedlings but including rhizomes, shoots, leaf or stem cuttings, roots, or tubers, used in plant production or propagation.

*GMO* - Genetically Modified Organism - a living thing whose genetic material has been altered or “engineered” with recombinant DNA technologies or other excluded methods. This does not refer to organisms produced by traditional breeding, hybridization, tissue culture, etc.

### The Search

The NOP states that non-organically produced, untreated, non-GMO seeds and planting stock may be used to produce an organic crop when an *equivalent* organically produced variety is not commercially available.

A producer may determine that seed is not commercially available via a search of a minimum of three relevant seed suppliers to verify if organic seed from varieties meeting or equivalent to those trait selections is available. “Commercial availability” may be based on appropriate form,

quality, or quantity. When comparing for an equivalent seed variety, consider comparable growing habits, days to maturity, insect resistance, disease resistance, flavor, milling qualities, etc., as applicable for your operation. The cost of seed or shipping is not a valid reason for opting to use non-organic seeds if organic seeds are commercially available.



### Documentation

Documentation of the attempts to source organic seeds and records verifying that nonorganic seeds are untreated and non-GMO is crucial and must be part of the audit trail.

To demonstrate that a variety is not commercially available, you will need to have documentation showing that you attempted to find the variety you are interested in as certified organic (as described above). This can be done on your own paper or using an audit form available from the OEFFA Certification office—“Organic Seed Search and Purchase Record.” Show that you contacted multiple companies, seed dealers, looked in catalogs, etc. Keep in mind that these should be dealers, catalogs, or individuals that are known to sell organic seeds.

Remember to secure proof from the seller about the seed itself, either in the form of a letter provided by the company you purchased the seed from, or a receipt or tag that shows it is untreated and non-GMO. The best time to get this documentation is when you purchase the seed. The inspector and/or the office will ask for it, and it can often be difficult to chase it down after the fact.

Since transitional growers must manage their operation under the rules for three years, the seed, seed, search, and documentation requirements also apply to them.

## **Annual Seedlings**

Annual seedlings do not fall under the exception that allows for untreated and non-GMO sources. Organic producers must use organically grown annual seedlings. The exceptions to this are very rare; it would require a mandate by state or federal phytosanitary regulations or a temporary variance for an *extreme* weather-related or natural disaster event. Certified producers should seek out certified organic sources or consider growing their own from seed.

If the seedlings are grown off-farm, they must be either grown on a certified organic operation or grown in a facility where the certified organic producer selling the crop is ultimately responsible for their management. This means that if a certified farmer has their seedling produced in a non-certified greenhouse or other facility, the certified grower must ensure that the seedlings are managed following the NOP standards, and all management practices and inputs are documented in the OSP. The facility must be inspected.

## **Annual & Perennial Planting Stock**

Crops like garlic, potatoes, and sweet potatoes are under the definition of planting stock, so you may use untreated/non-GMO garlic, potatoes, and sweet potatoes if the variety you want to use is not commercially available as certified organic. The documentation required for the search and the stock is the same as for seeds (see above).

You may purchase and plant non-organic perennial plants if you cannot locate certified organic in the variety you like. The perennials must be managed organically for one year before any crop harvested from them may be marketed as organic. Also, be sure that no prohibited substances are applied during planting, such as most products designed to keep roots hydrated or conventional growing media.

## **Saving Seed & Purchasing Saved Seed**

Seed that is produced on organic land is considered certified organic seed and can be replanted. This goes for your own crop or a certified organic neighbor. Be sure that if seed is cleaned at an off-farm facility that the facility is certified organic. You should be sure to have a copy of the organic certificate on file for the grower you purchased the seed from and the cleaning facility, if applicable.

While saving seed can be economical and allows you to ensure your seed is adapted to the conditions of your region or your farm, Katherine L. Adams, an agricultural specialist with ATTRA,

advises commercial farmers purchase their preferred variety of seed from a reliable source every few years. “This practice guards against disease build-up, inadvertent contamination of the stock, and reversion of the crop to undesirable traits.”

## **Treatments, Coatings, and Inoculants**

“Treated seed” has traditionally referred to seeds treated with pesticides, and specifically fungicides. Since most of these are prohibited substances, the common language used in organics is “untreated seed.” However, there are fungicides, inoculants, and coatings that are approved for use in organic production. These products may provide real advantages to growers on certain seeds and in certain settings.

However, it is very important that you confirm any substance applied to seed has been approved by OEFFA or OMRI before you purchase and plant it. Non-approved seed treatments contain prohibited substances and seeds are generally put in an entire field; thus, planting these treated seeds generally results in a noncompliance that a producer cannot resolve and the field(s) in question must go into transition for three years. This is an undesirable situation for the producer and for the certifier, so please be sure to check any seed treatment products first.

## **Resources**

There are on-line databases of organic seed suppliers that organic growers can use to source organic seeds:

- OMRI has developed an organic seed database which can be found at <http://seeds.omri.org/> like other OMRI product lists, the seed companies have to pay a fee for being listed and therefore this list is not comprehensive.
- The Organic Trade Association lists seed suppliers on their website at [www.ota.com](http://www.ota.com).
- OEFFA has a list of regional organic seed dealers. Call the OEFFA office at (614) 421-2022 to request a copy of this list. This list is available electronically or on paper.

OEFFA also has a sample Organic Seed Search and Purchase Record available in our audit trail package, which you may request from our office.

