

Ohio Ecological Food and Farm Association



OEFFA Certification Policies & Procedures

Updated January 2020

Purpose

The purpose of this manual is to provide detail and instruction for navigating the certification process and to share OEFFA Certification policies and procedures with OEFFA-certified operations. The USDA National Organic Program (NOP) Standards can be found in the accompanying book labeled as such. OEFFA's policies in this book serve to interpret and to make clearer certain sections of the NOP rules. Since our policies are also written in technical language to some degree, additional explanation is provided in common language, where appropriate (*in italics*). We value your feedback on the certification process, our services, and on our publications. Copies of all standards, guidance documents, and recommendations referenced in this manual are available upon request. Please contact us with any questions you have after you review this manual.

OEFFA Certification
41 Crowell Road
Columbus, Ohio 43214
Phone: (614) 262-2022
Fax: (614) 421-2011
organic@oeffa.org



TABLE OF CONTENTS

**New sections for 2020 and those with substantive changes are marked with a star*

PROCESS & PROCEDURES

The Organic System Plan (OSP)	3
Pre-Inspection Review	3
On-Site Inspection	3
Final Review & Certification Decision	4
Timeframe	4
Which forms do I need?	4
*Fees	5

POLICIES

I	Definitions	7
----------	--------------------	---

II	General	8
1	Organic Certificates	8
2	Cleaners & Sanitizers	8
3	Confidential & Public Information	8
4	Prevention of Contamination & Commingling	9
5	Operations with Multiple Production Units (“Grower Groups”)	9
6	Input Evaluation by OEFFA for Compliance with NOP Standards (“Materials Review”)	10
7	Inspection Scheduling	11
8	*Unannounced Inspections & Sampling	11
9	Multiple Individuals and/or Sites on One OSP	11
10	Recordkeeping	12
11	Soil & Water Testing	12
12	Timeline of Certification	13
13	Certificate Additions	15
14	Transaction Certificates (TCs)	16
15	International Trade & Marketing	16
16	Treated Wood	18
17	“USDA Organic” Seal, “OEFFA Certified Organic” Seal, & OEFFA Logo Usage	19
18	Pest Management in Facilities & Storage	20
19	Service Area	21
20	Transition to Organic	21
21	Uncertified Entities in the Supply Chain	21
22	*Responsibly Connected Persons	22
23	*Spot Inspections	22
24	*Infrastructure Projects	23
25	*Expedited Service	24

III	Crop	25
1	Annual Seedlings	25
2	Adjoining Land & Buffer Zones	25
3	Manure, Compost, & Compost Tea	26

4	Seed & Planting Stock Sourcing	27
5	Application of Secondary Nutrients & Micronutrients for Soil Fertility	28
6	Crop Rotation	29
7	*Drift & Flooding	29

IV	Livestock	31
1	Dairy Herd Conversion	31
2	Physical Alterations	31
3	Teat Dips & Udder Washes	31
4	*Livestock Healthcare	32
5	*Outdoor Access for Livestock & Poultry	33

V	Handling	34
1	Organic Ingredient Search Documentation for Products Labeled “Organic”	34
2	Labeling & Marketing	34
3	Handling Certification for Producers	35
4	Seed Mixes	36

VI	Appendices	37
1	*Appendix A: Import & Export Requirements	37

ORGANIC CERTIFICATION PROCESS & PROCEDURES

Certifying your operation to the National Organic Program (NOP) standards is a partnership between you and OEFFA. We are responsible to verify compliance with the organic standards, provide technical assistance, uphold the integrity of the organic label, and provide the best service to you that we can. It is your responsibility to comply with the standards, provide us the information we need in a timely fashion, and to implement the plan you send us on your operation. Communication at every step in the process is essential for success. Though organic certification is a commitment, it does not have to be difficult or daunting. We strive to make the process as straightforward and transparent as possible.

The Organic System Plan (OSP)

The certification process begins when an operation submits an Organic System Plan (OSP) to OEFFA. Application forms including the current deadlines and fees are available on our website or by contacting us. The OSP is the cornerstone of the certification process; it should present a complete and accurate picture of your plans for your operation for the current year and beyond. It is used by OEFFA staff and inspectors to verify compliance with NOP rules. As your plans change, updates may be made directly to the OSP or as supplementary documents submitted throughout the year. Keep a copy of the OSP and all supporting documentation you send to OEFFA. The “Scopes” of certification are as follows: crop, wild crop, livestock, and handling. Different forms are used for different types of operations. The OSP must be updated at least annually. We will automatically send you the forms required to renew your certification. Certified operations must submit certification fees and update the OSP each year.

Pre-Inspection Review

When we receive your OSP, OEFFA Certification staff will review it for completeness and compliance with NOP rules. You may be asked to supply additional information to complete the OSP, verify compliance with the rules, or correct areas of noncompliance. Requests for further information and noncompliance letters are common; please do not feel criticized or singled out if you receive one. The letter will explain what OEFFA needs from you to move your file to the next step and you will be given a deadline. Contact us with any questions you have about what to send. OEFFA will notify you in writing when your application is complete and ready to be sent to an inspector.

On-Site Inspection

Both OEFFA staff and independent contractors conduct inspections. We assign operations with complete OSPs to inspectors based on a number of factors, including the types of products requested for certification, nature of the operation, geographic location, previous inspections, and previous issues. Although the timing of your inspection may be affected by these factors, considering them helps us to keep certification fees low and largely avoid the need to bill inspection costs separately (with the exception of handlers). The first inspection occurs before harvest or production to verify your OSP, but subsequent inspections may occur before, during, or after harvest/production in order to observe relevant activity on the operation each year. An inspector will contact you to schedule an on-site inspection of your operation at a time that is convenient for both you and the inspector. Please make an effort to schedule this inspection in a timely manner and keep the appointment. During the inspection, the inspector will tour the operation, review your

records and recordkeeping practices, ask for documentation to verify compliance with the standards, and complete a report verifying the information in the OSP you submitted. The inspector does not make the final certification decision and cannot directly assist you in complying with NOP rules.

Final Review & Certification Decision

Following your inspection, the inspector will send a report to OEFFA. Staff will review your OSP, the inspector's report, and all other supporting documents. Additional information may be requested to fulfill requests by the inspector, to clarify items or issues noted at the time of inspection, or to correct areas of noncompliance. A decision to grant, deny, renew, suspend, or revoke organic certification will be made based on all of this information. If certification is granted or renewed, a letter summarizing all relevant issues will accompany the certificate. This letter may also describe areas to improve on before the next inspection. If certification is denied, or if OEFFA proposes to suspend or revoke your certification, you have the right to request mediation or appeal our decision, as detailed in the NOP standards.

Timeframe

OEFFA Certification works hard to provide professional and timely service at a reasonable cost. The time it takes from application to decision varies based on a number of factors. In all cases, submitting a complete and accurate OSP, and having complete, organized, and accurate supporting documentation for your inspector to review will make the process as smooth and as quick as possible. Each time more information is requested or a noncompliance is issued, it adds about a month to the process. If certification is needed by a certain date, please notify us of this at the time of application and request expedited service if necessary. If situations arise during the certification process, we do our best to accommodate requests for prioritization. We prioritize the inspection of new applicants, as new applicants must receive a certificate before selling organic products. Generally, a certificate can be issued to a new applicant in 3 months if the OSP is complete upon submission and the operation meets the NOP standards. Inspection must take place prior to production/harvest and no products may be marketed as organic prior to certification.

Which Forms Do I Need?

If you do not have the necessary forms or have questions about which forms apply to your operation, please contact us. We will automatically send the appropriate forms to renew certification to operations certified the previous year. A separate OSP is required for each legal entity (i.e. operation or business) that wants to be certified. Here are some examples of the forms (OSPs) required for various kinds of operations:

Dairy Farm – Producer and Livestock

Layers and/or Broilers - Producer and Livestock

Grain Production, Hogs, and On-Farm Feed Mixing for sale – Producer, Livestock, and Handler

Grain Production, Food Products produced at a separate facility – Producer and Handler

Maple Syrup – Producer and Handler

Greenhouse – Producer

Mixed Vegetables with Berries harvested from wild plants – Producer (including Wild Crop section)

Coffee Roasting – Handler

Broker/Trader – The following nine sections of the Handler OSP: General Information, Organic Plan Update, Affirmation, Mailing Information, Operation Information, Assurance of Organic Integrity, Transportation of Organic Products, International Markets, and Recordkeeping. Product Lists and labels will also be required, if applicable. If the broker/trader or an uncertified entity under contract store products before they are sold, they should complete the entire Handler OSP.

Fees

Producer Organic Certification (Land/Crops) - Includes inspection			
	OH	IN, KY, MI, PA, WV	IA, IL, MO, NY, VA, WI
<i>Application Postmarked by March 15</i>	\$950	\$1,100	\$1,150
<i>Application Postmarked March 16 - May 15</i>	\$1,000	\$1,150	\$1,200

Additional Certification/Application Fees for Producers - Includes inspection	
<i>Livestock Organic Certification</i>	\$400
<i>OPT Grass-Fed Certification</i>	\$250
Handling Organic Certification for Producers:	<i>*Gross sales of products certified under Handling scope (not Crops/Livestock/Wild Crops)</i>
-Prior Year Gross* Organic Sales ≤ \$50,000	\$250
-Prior Year Gross* Organic Sales \$50,001 - \$249,999	\$400
-Prior Year Gross* Organic Sales \$250,000 - \$499,999	\$750
-Prior Year Gross* Organic Sales \$500,000 - \$699,999	\$1,000
-Prior Year Gross* Organic Sales \$700,000 - \$899,999	\$1,250
-Prior Year Gross* Organic Sales \$900,000 - \$2,499,999	\$2,000
-Prior Year Gross* Organic Sales ≥ \$2,500,000	\$3,000

Handler/Processor Certification (Inspection Fee Billed Separately)	
<i>Prior Year Gross Organic Sales ≤ \$50,000</i>	\$500
<i>Prior Year Gross Organic Sales \$50,001 - \$249,999</i>	\$1,000
<i>Prior Year Gross Organic Sales \$250,000 - \$499,999</i>	\$2,000
<i>Prior Year Gross Organic Sales \$500,000 - \$699,999</i>	\$3,000
<i>Prior Year Gross Organic Sales \$700,000 - \$899,999</i>	\$4,000
<i>Prior Year Gross Organic Sales \$900,000 - \$2,499,999</i>	\$5,000
<i>Prior Year Gross Organic Sales \$2,500,000 - \$4,999,999</i>	\$6,250
<i>Prior Year Gross Organic Sales \$5,000,000 - \$9,999,999</i>	\$7,500
<i>Prior Year Gross Organic Sales ≥ \$10,000,000</i>	\$10,000

Other Service Fees	
<i>Transaction Certificates</i>	\$25
<i>Export/Import Certificates</i>	\$50
<i>Expedited Service Fee for Producers</i>	\$300
<i>Expedited Service Fee for Handlers</i>	\$500
<i>Outside of Service Area Fee</i>	.5% of gross income from organic products & services
<i>Transitional Verification Fee</i>	\$250 (<i>\$150 can be deducted from first application</i>)
<i>Reinstatement Fee</i>	\$300
<i>Investigations</i>	\$50/hour <i>Follow-up on complaints and serious compliance issues outside of the application and annual renewal process.</i>

Late Fees for Producers:	
<i>Application Postmarked May 16-June 15</i>	\$150
<i>Application Postmarked June 16-July 15</i>	\$250
<i>Application Postmarked after July 15</i>	\$400
<i>Noncompliance for Nonrenewal Fee</i>	\$100
<i>OEFFA may waive late fees for first-time producer applicants that produce and/or handle organic products outside the normal growing/ grazing season.</i>	
Late Fees for Handlers:	
<i>Application Postmarked 1 month past deadline</i>	\$100
<i>Application Postmarked 2 months past deadline</i>	\$200
<i>Application Postmarked 3 months past deadline</i>	\$300
<i>Handlers may apply at any time. There are no late fees for handlers to apply for the first time.</i>	

Inspection Fees	
<i>Handlers</i>	Actual fees billed by contractor. See below for OEFFA staff inspection rates.
<i>Outside of service area</i>	Actual fees billed by contractor. See below for OEFFA staff inspection rates.
<i>Additional time for producers</i>	Actual fees billed by contractor. See below for OEFFA staff inspection rates. <i>Occasionally required for applicants with multiple sites or complex operations.</i>
<i>Spot Inspections</i>	\$50 administrative + actual fees billed by contractor. See below for OEFFA staff inspection rates. <i>Additional inspection to add, change, or verify compliance. Requested by operator or required by OEFFA.</i>
<i>Sampling</i>	\$100 + actual cost of testing <i>Not billed for operations sampled pursuant to §205.670(d).</i>
<i>OEFFA Staff Inspections (Only billed in conditions described in this table, above.)</i>	Inspection time - \$50/hour Office time - \$35/hour Travel time - \$20/hour Mileage – current federal rate Travel expenses – actual cost

Administrative Fees	
<i>Returned Check Fee</i>	\$20
<i>Payment Plan Setup Fee</i>	\$25
<i>Certification Verifications for ≥25 operations</i>	\$35 (<i>does not apply to ACAs</i>)
<i>Other complex verifications requested by operations, performed at OEFFA's discretion</i>	\$35 per hour
<i>Pesticide Residue Testing Results</i>	\$35 per hour

Refunds
<i>If an application is withdrawn or certification is surrendered after payment and before inspection, a refund of 80% of application fees may be granted for each withdrawn or surrendered scope. A higher percentage may be retained by OEFFA for additional services rendered between submission and withdrawal/ surrender. No refunds will be given after inspection.</i>

OEFFA CERTIFICATION POLICIES

Section I: Definitions

Commercial Availability - The ability to obtain or source a production input or ingredient in an appropriate form, quality, or quantity to fulfill an essential function in the organic production or handling system, as determined by OEFFA in the course of reviewing the Organic System Plan (OSP).

Internal Control System (ICS) - A written quality assurance system included in an OSP that sets forth the practice standards, recordkeeping and traceability requirements applicable at each production unit, facility or site and that identifies the internal verification methods used.

On-Farm—On the site of the certified organic land, managed by the producer who is certifying the land.

Organic System Plan (OSP) - A plan of management 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 and/or handling. The OSP must be negotiated, enacted, and amended through an informed dialogue between certifying agent and producer or handler, and it must be responsive to the unique characteristics of each operation. The OSP is the forum through which the producer or handler and certifying agent collaborate to define, on a site-specific basis, how to achieve and document compliance with certification requirements. The OSP commits the operator to a set of practices and procedures that when executed result in compliance with the regulations.

Production Unit - The part of an organic operation where products are produced and/or handled after harvest, including any sub-units located within geographic proximity. A production unit operates under the operation's organic system plan and is managed through an internal control system (ICS) to ensure compliance with all applicable provisions of the regulations. Each production unit within a production or post-harvest handling operation has defined location, practices, management and/or products.

Site - The location of management activities for a given production unit.

Sub-unit - A smaller discrete portion of a production unit, such as a field, plot, wild-crop harvest area, or distinct processing area.

Section II: General

1. Organic Certificates [NOP §205.406]

Certificates are valid until surrendered (voluntarily given up), suspended, or revoked. The certification cycle is an annual process.

- The effective date of certification is the date as of which an NOP-accredited certifier first verified the operation was in compliance with the NOP standards.
- The anniversary date is the date by which an operator must submit his/her annual renewal paperwork and fees to OEFFA in order to remain in compliance. It is not an expiration date.

Even though organic certification is an annual process, your certificate does not expire after a year. However, you must renew your certification by OEFFA's annual deadlines to remain in good standing. If you do not plan to renew, you must surrender your certificate to avoid being suspended.

2. Cleaners & Sanitizers [NOP §205.272]

Cleaners, disinfectants, and sanitizers used on equipment, surfaces, or facilities are allowed as long as cleaning procedures completely remove residues of cleaners before contact with organic products. Documentation must be in place to show that the procedures are proven to remove all residues of prohibited substances. Cleaning and sanitizing materials that are allowed for organic product contact on the National List of Allowed and Prohibited Substances are excluded from this requirement (no rinse/purge/etc. is required). For some cleaners, a clear water rinse or product purge is enough. For quaternary ammonium (“quat”) sanitizers, a robust intervening event followed by a zero test strip reading on contact surfaces or a documented standard operating procedure that is proven to reliably remove all residues of the substance is required before contact with organic products. Cleaners and sanitizers used in aspects of organic facilities that do not contact any organic products (floor cleaners, employee sanitation, etc.) should be included in the OSP, but in most cases do not need to meet the criteria described above.

3. Confidential & Public Information [NOP §205.504(b)(4-5); §205.670(f)]

All information shared with OEFFA Certification is considered confidential, except for information we are required to release to representatives of the USDA National Organic Program (NOP) as well as all information considered to be public information by NOP. Information may also be shared with other USDA-accredited certifiers, as necessary. The NOP requires that certificates for the current year and three previous years, and all the information contained therein, must be available to the public. OEFFA Certification provides information listed on the current organic certificate to the USDA monthly to be listed in the Organic Integrity Database. Anonymized results of all analyses and testing performed are available for public access unless the testing is part of an ongoing compliance investigation. Confidential information from an operation's file may be released to the public only with written permission from the operation.

If you would like the details of your file to be discussed with someone other than yourself for any reason, please contact us and ask for an Information Release Form. If you would like an individual to edit your OSP and/or conduct inspections, please list this person in the box on your OSP that reads “Name(s) of others who can discuss this OSP.” Refer to the Responsibly Connected Persons policy for how to list people who can receive information about your operation or edit your OSP.

4. Prevention of Contamination & Commingling [NOP §205.272(a), §205.103(a)]

Equipment and storage areas must be cleaned between use in non-organic and organic production to ensure that no commingling (mixing of organic and nonorganic product) or contamination of certified land or products occurs. Documentation of the procedure(s) used and a record of the cleaning events must be in place to verify compliance.

Best practices include clear labeling of storage areas with respect to the organic status of products and/or inputs.

If you use equipment for both organic and non-organic production or handling, you must verify and document that equipment is clean before use with organic products or land. There are many ways to accomplish this, but guidelines for adequately cleaning some types of farm equipment are as follows:

- *If there is potential for contamination from prohibited substances, equipment with soil contact must be adequately cleaned.*
- *Spray equipment previously used with prohibited spray material or equipment in contact with seed treatments should be washed with water and a cleaning agent followed by a clean water rinse. Nozzles and meters should be removed and manually cleaned of any chemical residue.*
- *Equipment that is not readily washable (such as combines, square balers, augers, feed grinders, and roasters) should be cleaned of residue manually or with high pressure air followed by a product purge adequate to remove all nonorganic material.*

5. Operations with Multiple Production Units (“Grower Groups”)

A Grower Group is a group of producers whose farms are uniform in most ways and who are organized under one management and marketing system. Application for certification as a grower group requires pre-approval by OEFFA Certification. Please contact us if you are considering this approach to discuss the fee structure, required documents, and related issues.

To be considered a grower group, the following conditions must be met:

- The crops and farming practices of all producers in the group must be uniform and reflect a consistent process or methodology, using only the practices and inputs as listed on a single comprehensive Organic System Plan (OSP).
- The group must be managed as a single legal entity under one central administration. Producers who are certified as part of a grower group do not possess individual certificates. Rather, the grower group is certified as a unit.
- Grower groups must ensure that all members understand the NOP standards and how they apply to their specific operations.
- The grower group employs personnel adequately trained to verify that the individual production units are in compliance.
- Grower groups must utilize centralized processing, distribution, marketing, and finance facilities and systems. Participation in the group shall be limited to producers who sell all of their organic product(s) through the group.
- Recordkeeping protocols must be consistent. Individual production units, sites, or facilities may not differ significantly in their recordkeeping methodology.
- The producer group operation must establish and implement an Internal Control System (ICS), with supervision and documentation of production practices and inputs used at each

sub-unit, and collected at each production unit, site, or facility to ensure compliance with the NOP standards.

The Role of the Internal Control System (ICS)

An Internal Control System may also be called an Internal Quality System and is equal to the function of the Quality Assurance department of a large operation. Its mandate is to maintain consistency in compliance with the regulations as well as more traditional product quality concerns. The various components of a producer group operation all are governed by the same Organic System Plan and the ICS must maintain sufficient oversight to ensure all personnel are consistently following the plan. It is in the interest of this body to safeguard the organic status of the entire operation and the eligibility of the group as a whole for organic certification.

Within a production unit, the administrator of the ICS is charged with conducting surveillance and reviews of every smallest divisible part of the production unit, site or facility every year. For instance, for a single sub-unit of a farming operation that is made up of multiple production units, the ICS surveillance and review should focus on critical organic control points such as buffer areas, condition of growing crops, soil quality indicators, input and equipment storage areas, and level of understanding of organic requirements by the operator(s).

While it is the certifier's role to inspect at the level of production units, sites, and facilities and ensure that the ICS is functioning properly, the administrator looks deeper into each of these production units, sites, or facilities. For the operation seeking organic certification to be in compliance with the NOP, all non-compliances detected at the production unit, site, or facility or at the sub-unit or member level are required to be reported to the certifier (per NOP §205.400 (f)). All notices issued by OEFFA Certification for non-compliances perceived at the ICS or sub-unit level will be issued to the group as a whole.

For each grower group OEFFA certifies, OEFFA shall determine whether all or a portion, but no less than 1/3, of the production sites shall undergo annual inspection through a documented process which takes into consideration the following:

- The number of operations participating in the grower group;
- The size of the average operation in the grower group;
- The degree of uniformity among the group's operations;
- The complexity of the group's production system(s);
- The management structure of the group's ICS;
- Any noncompliance(s) issued from the previous year (if renewing certification); and
- Which particular sites were inspected in previous years (if renewing certification)

All new production sites must be inspected before being added to the group.

6. Input Evaluation by OEFFA for Compliance with NOP Standards (“Materials Review”)

All input products must be reviewed before a certified operation uses them. Use without pre-approval could lead to suspension or denial of certification of the affected land, animals, and/or products depending on the nature of the product and the use. OEFFA reviews inputs in the process of reviewing OSPs to protect the integrity of the organic food system and for the benefit of operations we certify. Documentation for approved inputs is updated at least every three years. Reviews of inputs are only conducted under the following conditions: a) the product is submitted in or with an application for certification or recertification, b) an operation submits a request directly to OEFFA, or c) a manufacturer submits a request with a substantiated claim that an OEFFA-certified operation wishes to use the product. OEFFA does not offer a fee-for-service input review program. As such, the Approved Products List (and the information contained therein) is not to be published

or used for marketing purposes in any way. We also generally accept organic product approvals made by the Organic Materials Review Institute (OMRI), the Washington State Department of Agriculture (WSDA) Organic Program, the California Department of Food & Agriculture (CDFA), and the US Environmental Protection Agency's (EPA) "For Organic Production" label for the scope and use that these agencies have listed them as approved for. If a producer wishes to use a product listed by one of these organizations for a scope/purpose/application different than the listing, OEFFA will conduct a review to determine if the product is compliant for that use.

List all inputs you will use on your OSP. Before using new products, check the OEFFA and OMRI lists to see if they are pre-approved. If a product is not on either list, contact us before you use it and we will review it for compliance. We are happy to conduct product reviews for you throughout the year, but please consider that these reviews often take some time to complete.

7. Inspection Scheduling [NOP §205.403]

An inspector or OEFFA staff member will contact the manager or authorized representative of each operation by phone, email, or mail to schedule the operation's initial or annual on-site inspection and spot inspection(s) if applicable. The operator and inspector should make every reasonable effort to find a time that is convenient for both. If the inspector is not successful in reaching an authorized representative within a reasonable period of time, s/he may choose to visit the operation without notice and proceed with inspection if an authorized representative is available. Cancellation of a scheduled inspection appointment should be reserved for emergency situations only. The operation may be issued a noncompliance if a scheduled inspection is cancelled by the operator, or if the operation fails to make an authorized representative available for full inspection of the operation. Increased inspection expenses may be incurred by the operation if an inspector must make multiple attempts to conduct the inspection.

8. Unannounced Inspections & Sampling [NOP §205.670, §205.671]

OEFFA conducts unannounced inspections and takes samples to test for residues of prohibited substances and/or GM DNA on at least five percent of OEFFA-certified operations annually. Unannounced visits may count as the annual inspection if all aspects of the operation are inspected, but they are generally short visits in addition to the annual inspection that cover only a portion of the operation. Sampling can take place at the annual inspection or at an unannounced inspection. Operations are selected for unannounced visits and sampling based on perceived risk to organic integrity, previous compliance issues, to verify corrective actions have been implemented, and at random.

If residues of pesticides or other prohibited substances are found on organic products, OEFFA will conduct an investigation. Depending on the reason(s) for contamination and the source, nature, and amount of contaminants discovered, the certification of a specific product or the entire operation may be affected.

9. Multiple Individuals and/or Sites on One OSP [NOP §205.2, §205.100(a)]

Each operation OEFFA certifies must submit an OSP and the appropriate fees each year. An "operation" must be a single legal entity and may be an individual/sole proprietorship, family, partnership, cooperative, LLC, trust or non-profit, public entity, association, or corporation. For operations with multiple sites and/or individuals involved, the OSP must describe the management of the entire operation. This includes all crops, livestock, and products at all phases of production, all inputs, infrastructure and equipment, conservation practices, pest management, transportation,

sales, and marketing. Decision-making and finances must be centralized and coordinated. All records for all parts of the operation must be available for inspection.

If applicants do not meet these criteria or are not a single legal entity, they will be considered multiple operations and must certify separately, with OSPs, fees, and certificates for each operation. In order to certify together, complex operations on a single OSP with multiple operators and/or sites may be required to certify as a grower group. For more details on grower groups, see the Grower Group policy in this manual.

Multiple family members or neighbors may certify together only when they are in business together. If the multiple individuals or locations cannot demonstrate that they are a single legal entity, they must certify separately. If an operation contains many individuals and/or is very complex, they may need to develop an internal control system and certify as a grower group.

10. Recordkeeping [NOP §205.103, §205.201(a)(4)]

All organic producers and handlers are required to keep detailed records about the production and handling of organic products. A recordkeeping system that is easily understood and auditable must be developed and maintained in a way that demonstrates full compliance with the NOP standards. Records may be hand-written, visual (such as drawings or photographs), and/or electronic. In some instances, standard operating procedures may be used to substitute for or augment records of ordinary activities. All records must be made available at the time of inspection and upon request by OEFFA staff or a representative of the USDA NOP. Records must be kept for at least 5 years after they are created.

The NOP sets a high standard for recordkeeping. Records should trace crops through production from seed to sale or use, livestock from birth or purchase to death or sale, and products from raw ingredients through production/handling to sale (and/or from a final product back to the ingredients). Your inspector will conduct a traceability audit and an in/out (“mass balance”) audit. If complete and accurate records are not in place or effectively maintained, a noncompliance may be issued.

11. Soil & Water Testing [NOP §205.200, §205.105(a), §205.203(a, c, d), §205.201(a)(3)]

Soil and water tests can help operations manage soil quality and promote food safety. Although NOP rules do not explicitly require either, these tests can help verify compliance with several areas of the rule and may be necessary to demonstrate that restrictions on certain inputs have been observed.

Water Tests

Water tests are necessary when there is reason to believe that the source of water for irrigation, foliar feeding, cleaning of organic products or equipment, livestock, or that is otherwise in contact with organic products is contaminated with prohibited substances or pathogenic organisms. A notable potential source of contamination is runoff from other farms or facilities. Water tests may also be useful to ensure practices on a certified operation do not contaminate surface water. OEFFA Certification staff will determine on a case-by-case basis when a water test is necessary to verify compliance.

Soil tests may:

- be part of a required monitoring program per NOP §205.201(a)(3).

- demonstrate maintenance or improvement of soil quality per NOP §205.200 and §205.203(a).
- be used to show plant and animal materials are not contaminating the soil as per NOP §205.203(c, d).
- be used to show crop rotation practices are maintaining or improving soil organic matter content and managing deficient or excess plant nutrients as per NOP §205.205(a, c).
- provide documentation that fixed copper and copper sulfate are being used in a way that minimizes accumulation in the soil per NOP §205.601(i).
- document the deficiency of a micronutrient to justify the use of a synthetic micronutrient per NOP §205.601(j)(7). Tissue tests may also justify the use of synthetic micronutrients.

OEFFA Certification may require soil tests when there is reason to believe inputs have caused an accumulation of restricted or prohibited materials in the soil such as copper, chloride, or heavy metals.

12. Timeline of Certification [NOP §205.202(b), §205.403(a)(1-2)]

This policy describes the order of activities for several scenarios where new applicants, or new facets of a certified operation, are requested for certification. See the “Certificate Additions” policy for what to send to OEFFA when requesting that additional items be listed on the organic certificate outside of the annual application, inspection, and review cycle. Crops, animals, and products may not be marketed as organic until they are listed on an operation’s organic certificate. OEFFA cannot list any item on an organic certificate until compliance with the organic standards is verified. Though in limited cases a desk audit is adequate to do so, generally an inspection is necessary. The effective date of certification will be listed on the organic certificate. Usually the effective date is the date of inspection unless organic integrity of crops harvested and/or products produced between inspection and certification cannot be verified. In these cases, the effective date will be the date OEFFA can ensure full compliance with organic standards.

- A. A farm requesting certification with OEFFA for the first time must be inspected at a time when activities that demonstrate the operation's ability to comply can be observed and before crops requested for certification are harvested for the harvested product(s) to be considered organic. An organic crop may only be harvested from land after 36 months (3 years) have passed since the last prohibited substance was applied.
- B. A new crop grown on land previously included in an operation’s OSP and inspected may be added to the operation’s certificate upon request with adequate documentation on all inputs including seeds, fertilizers, and pest control products. This may be accomplished by submitting the necessary documentation with the annual OSP or, if outside the regular application and inspection cycle, by requesting a certificate addition. OEFFA staff will review the information submitted and issue a revised certificate after compliance is verified. New crops must be substantially similar to those previously certified by the operation and the portions of the operation pertinent to the organic integrity of the new crop must be in full compliance for a crop to be added without an inspection.

- C. A crop grown by a certified operation on land that was not previously included in that operation's OSP, inspected, and certified will only be added to the organic certificate after an inspection has occurred. The crop must not be marketed, fed, or grazed as organic until the updated certificate is issued. If the land was managed by anyone other than the certified entity at any time during the preceding 3-year period, the request for certification must be accompanied by a *Prior Land Use Statement* or equivalent signed and dated documentation stating that the land has received no application of a prohibited substance during that time. In most cases, inspection must take place during the current growing season and before the harvest of the crop requested for certification, except:
- Land coming out of transition that has been listed on the OSP of the operation and previously inspected may be added to the organic certificate after the transition period is over and OEFFA has verified compliance.
 - The land is in hay or pasture, the operation is currently certified to manage the crop requested for certification on the new land, and the inspector is able to verify that the land was free of prohibited substances for three years before the date of harvest. Hay harvested from such fields may not be fed or marketed as organic until after the fields are added to the organic certificate.
- Under high-risk or time-sensitive circumstances, a spot inspection at the producer's expense may be recommended by OEFFA or requested by the producer instead of waiting for the annual inspection.
- D. A certified organic livestock producer or a livestock operation certifying for the first time may use pasture land eligible for certification but not yet inspected if their OSP lists the land and includes supporting documentation that it has been free of prohibited substances for 3 years. Livestock may also be housed in facilities that are included on the OSP but have not yet been inspected. In these cases, the producer assumes the risk of suspension or denial of certification if OEFFA finds during the inspection and certification decision process that livestock were fed non-certifiable crops or housed in noncompliant facilities. Livestock will not be added to the organic certificate until an inspection with animals present is conducted and a final certification decision is made by OEFFA. Livestock may not be slaughtered, marketed, or represented as organic until they have been added to the certificate.
- E. A handling/processing operation requesting certification by OEFFA for the first time must not label, sell, or otherwise represent products as organic until the facility has been inspected, the specific services and/or products have been certified, and OEFFA has approved labels to be used on the products. The operation must be inspected when activities that demonstrate the operation's ability to comply can be observed and before production occurs for the product(s) to be considered organic.
- F. A new product requested for certification by a certified handling/processing operation may be added to the certificate upon request if the following conditions are met:
- it was produced in facilities and with equipment already verified by OEFFA through inspection and certification

- adequate documentation is provided on all inputs used including ingredients and processing aids
- labels are approved by OEFFA
- it is substantially similar to those previously certified by the operation
- the portions of the operation pertinent to the organic integrity of the new product are in full compliance

This may be accomplished by submitting the necessary documentation with the annual OSP or, if outside the regular application and inspection cycle, by requesting a certificate addition. OEFFA staff will review the information and issue a revised certificate after compliance is verified.

- G. A product produced by a certified handling/processing operation using new equipment or facilities must not be marketed as organic until the updated certificate is issued. Labels must be approved by OEFFA before a product will be added to the organic certificate. In most cases, inspection must take place during or before production of the item requested for certification, except:
- Products produced in accordance with the approved OSP on replacement and/or additional, identical equipment may be considered organic once OEFFA has verified compliance.

Under high-risk or time-sensitive circumstances, a spot inspection at the handler's expense may be recommended by OEFFA or requested by the handler instead of waiting for the annual inspection.

Generally, the "order of operations" for organic certification is OSP then inspection then certification then sale or use. For operations certifying with OEFFA for the first time or adding new scopes, inspection must always take place before harvest or production but when it is possible for the inspector to verify the operation's ability to comply. Typically, this is when crops are growing in the ground, livestock are using the facilities, and/or handling facility equipment is set up and functioning. OEFFA may use the date of inspection as the "effective date" of certification if compliance is verified, or a later date if it is appropriate. If a certified operation wants to add something new to their OSP and ultimately their organic certificate, there are many pathways. The route to success begins by contacting OEFFA and explaining your situation as soon as you know about the change. OEFFA must ensure that all items to be listed on organic certificates are in compliance before they can be added, which may require any combination of documentation, correspondence, and on-site inspection. Using any land or facilities that have not been inspected and certified as part of your operation carries a risk that the resulting products could be found to be noncompliant and could have serious implications for your operation. Products that have not been added to the certificate cannot be marketed as organic. OEFFA may require, or a certified operation may request, a spot inspection to avoid the risk or delay associated with waiting for the annual inspection (refer to Spot Inspections policy).

13. Certificate Additions [NOP §205.102]

In order to represent or label any raw or processed product as organic or with other organic labeling claims, that product must first be reviewed, approved, and added to your certificate by OEFFA. For new products to be certified outside of the annual application, inspection, and review cycle, send the following documentation:

- Crop(s)/Land:
 - *Certificate Addition Request Form (for Producers)*
 - Field history information for the previous 3 years and plans for the current year

- *Prior Land Use Statement* or equivalent documentation (for crops grown on land not managed by you for 36 continuous months)
- A map of the new field
- Seed documentation (organic or non-GMO/untreated status verification and a purchase receipt)
- A list of inputs used to produce the crop
- Livestock:
 - *Certificate Addition Request Form (for Producers)*
- Handled/Processed Products:
 - *Certificate Addition Request Form (for Handlers)*
 - Color label proofs for each product

Note: Have labels approved by OEFFA before finalizing/printing.

 - Organic certificates for all organic ingredients
 - For all nonorganic ingredients: Signed documents showing that all ingredients are non-GMO, non-irradiated, and produced without sewage sludge (ex: *Non-Organic Ingredient Form*)
 - Other required documentation as needed (ex: *Organic Ingredient Search Record for Handlers*, *Natural Flavor Statement*, supplier label for sub-ingredient verification, etc.)

Once we have verified compliance, we will add the product to your certificate so you may begin marketing the product as organic. In some cases, a spot inspection at the certified operation's expense may be required to determine compliance. Notify OEFFA as soon as possible about changes to certificates that are needed; certificate additions requiring an inspection may take a month or more to complete. Additions requiring only a desk audit generally take one to two weeks after OEFFA receives complete information.

14. Transaction Certificates (TCs)

A TC can be part of the audit system to track certified organic products from the grower to the end user. A TC shows the origin of the product and confirms the specific product was produced and handled in accordance with NOP standards. They may also verify additional information such as the "100% Organic" status of a specific load or batch of organic product. TCs are not required by OEFFA Certification. However, they are available if requested by the buyer or preferred by the seller. To begin the process, an OEFFA-certified operation must complete a Transaction Certificate Application and submit it with the appropriate fee. A TC is prepared, the original is sent to the buyer, and a copy is sent to the seller. There is a limit of five transactions with a single buyer per TC. TCs will not be issued for transactions that occurred more than one year before the date of request. Please note that Transaction Certificates may take up to one week to process after OEFFA receives complete information.

15. International Trade & Marketing

Products and ingredients that are eligible to be exported or imported as organic are limited. Those that are eligible carry restrictions as well as additional verification, recordkeeping, and labeling requirements. The USDA has trade agreements with other regulatory bodies that allow some products certified under the USDA standards to be marketed as organic in other countries and some

products certified to other standards to be marketed as organic in the U.S. Each agreement includes specifications and restrictions around what can be traded as “organic.” Each agreement also has its own labeling and documentation requirements for import and export of organic products. Trade agreements take on several forms including Equivalency Arrangements, Recognition Agreements, and Export Trade Relationships. Equivalency Arrangements mean that if the terms of the arrangement are met, organic products certified to organic regulations in both countries may be labeled and sold as organic in both countries. Recognition Agreements allow foreign governments to accredit certifying agents in that country to USDA standards. These foreign certifiers are authorized to certify organic operations to the USDA organic standards. The resulting products can then be imported to the U.S. Lastly, an Export Trade Relationship allows USDA Organic products to be sold as organic in the destination country. *See “Appendix A” regarding the specific international trade agreements in place and corresponding requirements.*

Auditable records must be kept which show compliance with the relevant trade agreement(s). Exported products must meet the labeling requirements of the destination country. Some labeling requirements are not fully detailed in “Appendix A;” contact OEFFA for details and label proof review.

Imported organic products treated with ionizing radiation or a substance (such as a fumigant) prohibited by the USDA organic regulations may not be sold, labeled, or represented as organic or organically produced or handled. Agricultural products are commonly treated at point of origin, in transport, or at the point of entry. If an uncertified entity has imported the product, an agreement with that entity to pass on treatment information to your operation may be relevant.

The first certified entity to receive the shipment must verify and maintain the following documentation for each import event:

- Documentation of inspection and any relevant treatment at all non-domestic ports [Phytosanitary Certificate(s)]
- Documentation of inspection and any relevant treatment at domestic ports [USDA APHIS Plant Protection and Quarantine directed treatments (documented on form PPQ 523 – Emergency Action Notice and PPQ 429 Fumigation Record)].
 - These PPQ forms are only issued if treatment has occurred. If the shipment was released without treatment, obtain a governmental record documenting this.
- Standard import documentation

Due to the complex nature of international trade agreements, it is important to understand the requirements prior to arranging an organic trade. Standard Operating Procedures on the relevant trade requirements for recurring import or export events should be a part of the OSP. OEFFA must verify and approve these procedures before import or export of a given type of organic product under a specific trade arrangement begins. See “Appendix A” regarding the specific International Trade Policies in place and corresponding requirements.

Requesting International Verifications and Export Certificates:

A. Import: Requests may take up to one week to process after OEFFA receives complete information. If submitting the request with your annual renewal, note this new aspect of your operation under the *Organic Plan Update* section of your OSP.

- PRODUCERS: Contact OEFFA to discuss your specific import scenario.
- HANDLERS: Complete or update the relevant product forms as described on the *Product Lists, Product Profiles, & Labels* page of your OSP. Then, on the *Material Inputs Details* page,

complete *Section D: Import* and include corresponding attachments such as Standard Operating Procedures.

B. Export: OEFFA staff will review the information. After compliance is verified OEFFA will issue an export certificate, attestation statement, and/or revised organic certificate as relevant. Requests may take up to one week to process after OEFFA receives complete information. OEFFA bills the appropriate fee for export certificates after issuance. Export certificates may be generated and issued through the mail for all destinations except the EU which requires that they be issued through the TRACES System. Operations exporting to Japan, Taiwan, South Korea, and Mexico may request that export certificates be issued electronically in the USDA's Electronic Trade Document Exchange System (eTDE).

If submitting the request with your annual renewal, note this new aspect of your operation under the *Organic Plan Update* section of your OSP.

- Fill out the *International Markets* section in your OSP and include any updates to the information detailed below as well as any relevant Standard Operating Procedures.

Documentation Required for Export Verifications:

- PRODUCERS (most of this is included in the standard OSP forms):
 - › For each crop/agricultural product you wish to export:
 - Input and field history documentation
 - › For each labeled product you wish to export (e.g. produce in boxes):
 - Label proofs (retail or non-retail)
 - › For each agricultural product derived from animals (with the exception of ruminants) you wish to export to Canada:
 - Record of livestock stocking rates
 - › For each livestock or meat product you wish to export to Taiwan:
 - Record of healthcare and drug inputs
- HANDLERS:
 - › For each agricultural ingredient in the product(s) you wish to export (i.e. flour in pasta shells):
 - Organic Certificates from your suppliers that show compliance with the desired equivalency arrangement or certification to the desired standards
 - or-
 - Statements, signed by your suppliers' certifying agents, which show compliance with the specific equivalency arrangement (*Contact us to request a sample form.*)
 - › For each labeled product you wish to export (e.g. pasta shells):
 - Label proofs (retail and/or non-retail)

16. Treated Wood [NOP §205.206(f)]

Wood or lumber treated with prohibited materials may not be used for any application where contact with certified land, animals, or products may occur. Infrastructure made from or with treated wood that exists on the premises before organic management begins may remain, but all repair, replacement, and new construction must be done with compliant materials. Coatings and/or physical barriers that prevent contact of treated wood with certified land, animals, and products may be approved, on a case-by-case basis, if there is sufficient evidence that the coating or barrier will a) prevent contact with treated wood over the life of the structure, b) not contribute to the

contamination of any certified entity with prohibited substances, and c) not contribute to contamination of crops, soil, or water. If any of these conditions are not met, an appropriate buffer may be established between the noncompliant structure and the certified growing area, animal, or product. Adequate buffers will be determined based on the nature of the operation, potential for contamination, and on-site evaluation by the inspector. Sawdust or shavings from treated wood or that contain prohibited substances from gluing, staining, etc. are not allowed as animal bedding on organic operations.

Treated wood is prohibited by the NOP rules for new construction and replacement/repair. OEFFA has not reviewed any treated wood product that is acceptable for use in organic production and handling. Use of treated wood will result in a noncompliance and additional measures will be necessary to prevent contamination of organic products and land.

17. “USDA Organic” Seal, “OEFFA Certified Organic” Seal, & OEFFA Logo Usage

[NOP §205.303-.304, §205.311]



Use of the USDA organic seal is optional. The use of the seal must be according to NOP regulations and must be pre-approved by OEFFA Certification. It may only be included on organic raw or processed agricultural products, or in marketing information for those products. The USDA seal may only be used on products that fall in the “organic” or “100% organic” categories. It must *not* be used on products that fall in the “made with organic [ingredients]” category. Usage must comply with NOP §205.311 and the font must be Helvetica Neue Condensed. Other forms of the seal are noncompliant. If using the transparent version of the seal described at §205.311(b)(2), all components not displayed in black, including the word “organic,” must be transparent.



The OEFFA Certified Organic seal is optional and is intended for use only on organic raw or processed agricultural products, or in marketing information for those products. The use of the seal must be according to NOP regulations and must be pre-approved by OEFFA Certification. The OEFFA Certified Organic seal may be used on products labeled as “100% organic,” “organic,” *and* “made with organic [ingredients].” The OEFFA Certification seal may be used to satisfy the “Certified Organic by...” statement requirement per NOP §205.303(b)(2) if the words, “OEFFA Certified Organic” at the top of the circle are readable, and the seal is placed directly below the certified operation’s identification information on the information panel. If the OEFFA Certified Organic seal is used on the same product as the USDA seal, the OEFFA seal must not be displayed more prominently than the USDA seal (i.e. the OEFFA seal cannot be larger than the USDA seal, the OEFFA seal cannot be on the front of the package (principal display panel) while the USDA seal is on the side or back of the package, etc.).



Given the unique niche that OEFFA occupies as a grassroots membership and advocacy organization and a separate but related accredited organic certifying agent, we affirm that it is in everyone’s best interests to ensure that use of the OEFFA logo does not in any way lead to misunderstandings about the certification status of a given operation or compliance of a given input. To that end, non-certified OEFFA members who wish to display the OEFFA logo on websites, labels, products, or promotional materials should use the provided image that includes the logo and the clarifying “Proud Supporter” designation. The OEFFA logo may not be used to imply OEFFA certification or approval of any product.

Both the USDA and OEFFA Certification seals are intended to be used to represent organic products. You must ensure that seal versions are compliant and usage does not misrepresent non-certified aspects of your operation. If using on marketing materials (i.e. websites, brochures, signs, etc.), the seal(s) must not be used in association with nonorganic products. Contact OEFFA to have seal and logo usage approved prior to printing, displaying, etc.

18. Pest Management in Facilities & Storage [NOP §205.271]

Pest Prevention

Pest control in organic facilities requires a multi-tiered approach. First, operations must use management practices to prevent problems before they happen. These include preventing pest access to facilities and organic products and removing food sources, shelter, and breeding areas for pests by maintaining clean production and storage areas.

Pest Control

- When prevention is not enough, mechanical or physical means may be used to control pests. Lures and repellents using nonsynthetic or synthetic substances consistent with the National List may also be used.
- If problems persist, nonsynthetic materials and synthetic materials listed in the National List may be used. Placement and containment of these substances must be such that contact with certified products, land, or livestock is not possible. OEFFA Certification allows the use of bait boxes outside the facility or production area if there is no risk of contamination of organic products.
- If the practices provided for above are not effective to prevent or control pests, a synthetic substance not on the National List may be used, provided that the certified entity and OEFFA agree on the substance, method of application, and measures to be taken to prevent contamination of certified products.
- Prior to using a pest management substance not on the National List (i.e. pesticides and rodenticides), a certified operation must first:
 - Document the need to use that substance. Include the specific preventative measures taken, any relevant pest monitoring results, etc., and
 - Document a plan to protect organic integrity while using the substance, including the name of the substance, where the substance will be applied & for how long, the method of application, and any other important details.

Other Regulations

If NOP or OEFFA requirements conflict with any federal, state, or local health or safety regulations in any way, the certified operator should contact OEFFA to resolve the issue. For details regarding federal and state emergency pest and disease treatment programs see NOP §205.672.

Managers of organic facilities must try to prevent rodents and other pests from accessing facilities and organic products. If this does not work, techniques (such as trapping) and substances (such as Vitamin D3 and boric acid) that are approved for organic production may be used, in that order. If these also do not work and additional measures to prevent or remedy infestation are necessary, you must contact OEFFA for approval before use and prevent contact with organic products.

19. Service Area

OEFFA Certification offers certification services in a defined service area in the Midwest and Mid-Atlantic United States. It is beyond the administrative capacity of OEFFA Certification to offer services to operations located and/or headquartered outside of the defined service area. We accept new applicants located and/or headquartered in the following states: Illinois, Indiana, Iowa, Kentucky, Michigan, Missouri, New York, Ohio, Pennsylvania, Virginia, West Virginia, and Wisconsin.

20. Transition to Organic

Operations transitioning land to organic production must manage the land without prohibited substances for three years before it is eligible for certification. Records to demonstrate the land is eligible for certification will be verified during the initial review of your application for certification and at the first inspection. OEFFA recommends developing an Organic System Plan during the transition period to ensure your operation is ready to be certified when the transition period is over.

OEFFA proudly offers support to transitional operators through many avenues. One service is the review of an Organic System Plan by certification staff for compliance with National Organic Program Standards. Certification staff will work with an operation to identify areas where the plan is incomplete and/or does not comply with the standards. If the operation submits a complete and compliant plan or adjusts the initial plan to demonstrate compliance, certification staff will write a letter to the operation and/or an entity of their choosing indicating that OEFFA has reviewed and verified the Organic System Plan. OEFFA Certification does not offer a Transitional Certification program at this time. Transitional verification does not include an on-site inspection or a certificate. The verification letter does not imply or guarantee organic certification. Transitional operations are prohibited from marketing their products as organic before certification. Fees for transitional verification are specified on OEFFA Certification's Producer Fee Sheet and are due with the Organic System Plan. OEFFA's education staff offers a broad range of services and support beyond this verification program. Contact us for more details.

21. Uncertified Entities in the Supply Chain

Certified organic operations must maintain records sufficient to demonstrate compliance of all purchased organic inputs. There are additional requirements when purchasing from operations that are not required to be certified ("excluded operations"). These operations may only handle organic products if they do all of the following:

- Only handle products that are packaged or otherwise enclosed in a container prior to being received or acquired by the operation, remain in the same package or container, and are not otherwise processed (see 205.2) or labeled while in the control of the handling operation.
- Comply with the requirements for prevention of commingling and contact with prohibited substances as set forth in §205.272.

Documentation must demonstrate full traceability back to the last certified operation for each shipment of bulk and/or unlabeled organic inputs from uncertified handlers, brokers, and distributors. This typically means:

- Audit trail records must link directly back to the last certified operation, including transport, storage, processing/handling, shipping, and/or distribution. Documents generated by the

last certified operation proving purchase/delivery/transfer of the specific lot number to the uncertified entity must be available.

- The last certified operation must be listed on invoices and/or lot numbers applied by the last certified operation must match lot numbers on uncertified entity audit trail records.
- For each delivery, uncertified entities must provide a complete, current organic certificate for the last certified operation, as well as import documentation if relevant.
- Purchase invoices, BOL, and other audit trail records must designate products as organic and include a description of the product and amount transferred.

For packaged and labeled organic inputs, documentation must sufficiently link the product with an organic certificate.

All certified and uncertified suppliers must be approved by the certifier. Traceability will be verified as a part of the certified operation's audit and review. If organic product cannot be traced back to the last certified operation, the certified organic operation making purchases will not be allowed to source organic inputs from the uncertified entity.

22. Responsibly Connected Persons [NOP §205.2, §205.662(f)(2)]

NOP defines “responsibly connected persons” who can represent an operation, but it can be confusing to sort out which individuals have which privileges and responsibilities and where they should be listed in an OSP. There are three categories of people who can discuss or make changes to the OSP and/or be listed on the certificate.

- The individual(s) listed in the OSP as “Operation/Business Name,” and/or “Owner/Operator” (including partner, incorporator, sole proprietor, etc.) are considered *responsibly connected persons*. These people may be listed on the certificate and make changes to the OSP, including adding or removing names from the list of responsibly connected parties and changing certification status (e.g. adding or surrendering scopes). OEFFA may request documentation supporting claims of who is, and is not, a responsibly connected party.
- There may be additional *authorized representatives* of the business (e.g. manager, Quality Assurance/Compliance contact, employee, family member involved in operating a family farm, etc.) who may all be listed in the OSP as “Others who can discuss this OSP.” These individuals are generally not listed on the certificate itself. They may make changes to the OSP and conduct inspections but may not add or remove names of responsibly connected parties and may not add or remove scopes.
- Finally, individuals or businesses listed on an *Information Release Form* may receive information about the operation but may not conduct inspections, make changes to the OSP, or be listed on the certificate.

OEFFA does not discuss OSPs or inspections with anyone not listed in the OSP or identified in an Information Release Form except other certifiers and the NOP, as necessary.

23. Spot Inspections [NOP §205.403(a)(2), §205.102]

OEFFA may conduct on-site inspections in addition to the annual inspection to determine compliance. Spot inspection expenses are usually paid by the operation. Operations may request a spot inspection or OEFFA may require one, such as if compliance could not be verified during the annual inspection due to weather, unavailable personnel, etc. or to verify correction of serious compliance issues (see also *Timeline of Certification* policy). Spot inspections are often necessary when an operation is adding the following outside of the annual renewal cycle:

- New field (land that is not already listed on the operation's current OSP)
- New livestock type
- New crop type (e.g. vegetables vs. row crops)
- New storage location if not substantially similar to location(s) already in the OSP and previously inspected
- New processing equipment if not substantially similar to equipment already in the OSP and previously inspected
- New farm/facility location (e.g. livestock housing, sugar shack, milking parlor, off-site greenhouse)
- Other major changes in the operation – if in doubt, contact OEFFA.

Operations should use the *Certificate Addition Request Form* to add these new items or submit OSP updates to OEFFA. Refer to the *Certificate Additions* policy for details.

If a new facility or storage area is being built or new equipment is being installed, the spot inspection should occur after it is built/installed (when compliance can be verified) and before it is used for organic products or livestock. Operations are responsible for communicating with OEFFA regarding their construction and production timelines.

24. Infrastructure Projects [NOP §205.200, §205.202, §205.272]

Infrastructure projects (energy/utility, public works, industrial, etc.) on or near organic operations can create compliance challenges. Their installation can entail earth moving, construction practices, remediation, wastewater production, and other activities that may be out of alignment with organic standards. The construction, ongoing operation, and maintenance may also be sources of contamination for organic crops or livestock when projects are installed on or near organic land.

Examples of industry that may compromise certification include:

- Surface mining operations, including concrete manufacturers
- Surface/sub-surface coal mining extraction operations
- Oil and natural gas exploration and transportation (e.g. oil & gas wells, pipelines)
- Residential and commercial land development projects
- Highway/road construction projects including paving and bridge development
- Commercial/governmental manufacturing facilities
- Utility construction and maintenance (e.g. powerlines, telephone pole, cell tower)
- Other major infrastructural changes unrelated to the organic operation

Land disturbed and at risk of contamination by industry may have to be removed from certification for at least three years and will need to be evaluated for contaminants prior to recertification. An on-site inspection may be needed to assess the impact to the organic operation, verify the risk and prevention of contamination, and look at factors such as adequate buffers or required monitoring. OEFFA will review the Organic System Plan and the Inspection Report, including specific conditions found at each site, in order to determine eligibility of land with existing infrastructure and consequences for organic land where infrastructure development has occurred.

Guidance for infrastructure projects on certified organic operations:

- Operator's Responsibility
 - Submit project description and/or updated Organic System Plan to include:
 - What activity is planned and over what timeline?

- What fields or facilities are impacted? Indicate on maps areas that are being impacted by the project(s).
- When will testing, drilling, construction, etc. begin?
- Testing or other monitoring of soil, water, or crop quality and presence of contaminants.
- A buffer area around activity is required, including sufficient fencing for livestock. Fencing must be NOP compliant.
- Reclamation activities must be done with NOP compliant inputs (seed, fertility, etc.). Soil brought from off-farm must be documented to be free of prohibited substances.
- If a spill or other contamination occurs, the affected land will be removed from certification for a minimum of 3 years.
- Refer to the *Agricultural Impact Mitigation Provisions for Organic Farms* for specific guidelines on commonly-used substances in infrastructure projects.

The operator should have their approved Organic System Plan available to present to the contractor to establish a clear understanding of organic certification requirements and maintenance of organic integrity during activity. Some infrastructure companies have organic mitigation protocols that can be implemented as part of their lease contract and may be monitored by personnel familiar with organic certification requirements.

- OEFFA's Responsibility
 - Review and approve updated Organic System Plan.
 - Conduct on-site inspections as needed.

As it is impossible to predict all potential contamination occurrences, OEFFA may issue non-compliances associated with infrastructure projects after approving the updated Organic System Plan.

25. Expedited Service

OEFFA is dedicated to providing efficient, professional, cost-effective service. All applications and special requests are processed in accordance with our priority system and, from there, in the order received. Due to the importance and complexity of the application review, inspection, and compliance review process, OEFFA recommends that certification applications are submitted at least 90 days prior to organic production or other deadlines. For special situations with short certification time frames, OEFFA provides expedited services to meet operation needs.

Operations that may want to take advantage of this service include those with impending harvests, market releases, or product launch deadlines, and operations who wish to finish the certification process as soon as possible. OEFFA may request that an operation pay for expedited service when contacted by a prospective applicant or client with a significant change who presents a short timeframe.

When an operation requests expedited service, OEFFA provides top priority processing by placing these files in the front of the line, generally assigning personnel to work on the file as soon as it is ready to proceed to the next step. Inspection logistics are generally considered as soon as the expedited request is received.

Despite moving the process forward as quickly as possible, OEFFA cannot guarantee certification by a certain date. Many factors affect the timing of the final certification decision -- compliance on-site, quality of the application, the inspector's findings, and timeliness of response by the operation. Reduction from approximately 90 days to 30 days is possible when all of these pieces fall into place and when no issues are discovered through the certification process.

Section III: Crop

1. Annual Seedlings [NOP §205.204(a)]

Organic producers must use organically grown annual seedlings, except under a temporary variance or after treatment due to Federal or State phytosanitary regulations. If the seedlings are grown off-farm, they must be grown (a) by a certified organic operation or, (b) in a facility where the organic producer is ultimately responsible for the management of the seedlings. Facilities where seedlings are grown must be managed following the NOP standards, documented in the OSP, and must be inspected. The certified producer must source and supply input materials, including but not limited to seeds, soil mix, fertility products, foliar sprays, and pest and disease management inputs. All inputs must be approved by OEFFA Certification and must be documented in the OSP.

All seedlings used to produce certified organic crops must be organically grown except in very rare circumstances (see standard citation, above). It may be acceptable under some circumstances for seedlings to be grown organically in an off-farm facility, but that facility must be included in the OSP and inspected each year. Annual planting stock is subject to the same rules as seed (see the Seed & Planting Stock Sourcing policy for details). Examples of annual seedlings are: onion seedlings (with green tops), tomato and pepper starts, brassica seedlings, etc. Onion sets, sweet potato slips, seed potatoes, cloves of garlic, fruit tree saplings, asparagus crowns, and mushroom spawn are all examples of planting stock.

2. Adjoining Land & Buffer Zones [NOP §205.2, §205.202(c)]

A buffer zone is defined as an area located between a certified organic production operation, or portion thereof, and an adjoining land area that is not under organic management. A buffer zone must be sufficient in size or include other features (e.g. windbreaks or a diversion ditch) to prevent the possibility of unintended contact and “drift,” which is defined by the NOP as “the physical movement of prohibited substances from the intended target site onto an organic operation or portion thereof.” Under normal circumstances, industry standard calls for maintaining at least a 25-30’ buffer zone adjoining non-organically managed land. If windbreaks or other barriers are present, OEFFA may approve a smaller buffer zone based on details in the OSP and/or inspection report. Some adjoining land use activities may require the implementation of larger buffer zones to accomplish the objectives listed above (e.g. aerial spraying in an adjoining crop, pollen drift from adjoining crops). Management strategies (e.g. planting corn with different pollination times) may help reduce the need for extended buffers. These measures must be described in the producer’s OSP. Please see the *Treated Wood* policy for details regarding when buffers are necessary around structures, facilities, and fences built or repaired with treated wood. Note that the land and any crops produced within the buffer zone are not certified organic, meaning crops harvested cannot be sold as organic or fed to organic livestock. All buffer crop harvest, storage, end use, and any applicable equipment cleaning must be documented. A written agreement with an adjoining landowner (*Adjoining Land Use Statement* form or equivalent) indicating that they will not apply any prohibited substances within a defined area away from organic land may be accepted in lieu of a buffer; such situations will be reviewed on a case-by-case basis.

To protect organic crops from contamination by prohibited substances applied near production areas, buffer zones are often needed. The inspector will help OEFFA determine how large a buffer must be to avoid contamination, based on many factors. Wide buffers may be needed in the case of neighboring conventional crops with prevailing winds and/or a slope toward the organic crops. A narrower buffer may be acceptable in cases where treated wood or treated seed is used next to organic fields. If roadsides, oil wells, or power lines are sprayed, a buffer will be required. Crops grown in the buffer are not organic but may be grazed by nonorganic livestock, harvested and used, or sold as conventional.

Records must show that buffer crops were harvested, stored, and sold separately from organic crops, and that proper equipment and storage cleanout were conducted to avoid contamination of and/or commingling with organic crops.

3. Manure, Compost, & Compost Tea

Producers using animal manure as a fertility input must follow the restrictions set forth in NOP §205.203(c)(1) unless it is composted according to the definition in NOP §205.2 and meets the criteria described in NOP §205.203(c)(2). Additional ways to comply are described for compost and vermicompost in NOP guidance 5021 and for processed manures in NOP guidance 5006.*

Pursuant to NOP §205.203(c)(3), “compost” containing no animal manure may be used as uncomposted plant matter as long as it is not made from prohibited feedstocks. Further, compost made from allowed feedstocks (e.g. allowed nonsynthetic substances including manure, synthetic substances on the national list as plant or soil amendments, etc.) is allowed without restrictions if the compost pile is mixed or managed to ensure that all of the feedstock heats to the minimum of 131° F for a minimum of three days.

Vermicomposts must be made from allowed feedstocks with aerobic conditions and 70-90% moisture maintained throughout the composting process; duration must be sufficient to produce a finished product that does not violate §205.203(c).

All on-farm composting should be documented in the OSP and verified during the inspection. OEFFA will require documentation from certified operations that compost and vermicompost meet the above criteria for approval. When determining initial C:N ratio, data provided by the compost producer may be used, or standard feedstock C:N ratios supplied by Ohio State University Extension will serve as a reference point. Certified operations can also demonstrate compliance by measuring temperature, time, moisture content, chemical composition, and biological activity. Examples of these measurements include testing feedstock materials and compost for one or more characteristics including initial and final carbon to nitrogen ratios, stability (using ammonia/nitrate ratio, O₂ demand, CO₂ respiration rate, or other standard tests), pathogenic organisms, or contaminants. Equivalent documentation is required for all off-farm compost reviewed by OEFFA for use by certified operations.

Compost extracts or “teas” must be produced from an approved compost (see above) and drinkable water and may be used for fertility (NOP §205.203(c)(2)) or pest (NOP §205.206(b)(1)) & disease control (NOP §205.206(d)(2)). If made without additives, compost tea may be applied without further restriction except that foliar applications to leafy greens are not permitted unless testing conclusively demonstrates that crops will not be contaminated with pathogenic organisms. If additives are used, the tea must meet the conditions set forth in the National Organic Standards Board (NOSB) recommendations of November 9, 2006. A tea made from product that does not meet the criteria for compliant compost or vermicompost in this policy shall be subject to the restrictions of 90 days before harvest if applied as a soil drench for crops with no soil contact, or 120 days otherwise.

All manure and compost applications must follow NOP §205.203(c) and must not “contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances.” If manure is applied to frozen ground, careful attention must be paid to slope, proximity to a waterway, drainage, ground cover, presence of snow, and any factors that may encourage contamination of waterways. If manure is sourced from off farm or from non-organic animals, the operator should ensure that the manure is free of prohibited additives.

Crop producers should verify that manure sourced from conventional operations does not contain prohibited treatments or additives such as odor and fly control substances or prohibited lime and gypsum products. Inputs used by the conventional operation during production (feed additives, bedding, etc.) are not considered when evaluating compliance. Treatments and additives

added directly to the manure should be disclosed in the OSP and approved by OEFFA before manure is applied.

*“Processed manure products must be treated so that all portions of the product, without causing combustion, reach a minimum temperature of either 150° F (66° C) for at least one hour or 165° F (74° C), and are dried to a maximum moisture level of 12%; or an equivalent heating and drying process could be used. In determining the acceptability of an equivalent process, processed manure products should not contain more than 1×10^3 (1,000) MPN (Most Probable Number) fecal coliform per gram of processed manure sampled and not contain more than 3 MPN Salmonella per 4-gram sample of processed manure.”

- *Manure that is not composted to meet the guidelines in the NOP standards and guidance is considered “raw” and its use is restricted. If the input is to be used on crops for human consumption, it must be applied and incorporated 90 or 120 days before harvest, depending on the crop. Incorporation is generally assumed to mean mechanical tillage to mix the manure into the soil. Any harvestable portion of a crop that contacts soil or that can be splashed with soil during precipitation or irrigation is considered to have soil contact. Plastic mulch or other barriers generally do not adequately prevent splash. Crops that do not have soil contact include tree fruits, dry beans, and sweet corn. This restriction applies only to crops for human consumption -- it does not apply to fiber crops, cover crops, or to crops used as livestock feed.*
 - *Compost “teas,” even if made without manure, may also be subject to this restriction. Foliar application of compost teas to leafy greens is not permitted without testing due to food safety concerns.*
- *We recommend that OEFFA-certified producers do not spread manure on frozen ground. However, if NOP rules are followed, under certain circumstances and with careful consideration, it may be acceptable to do so.*
- *Operators are asked to indicate in their OSP if they verify manure sourced off-farm is free of prohibited substances. This generally means additives to the manure used for insect and odor control and those that have functional effects when spread on crop fields. Feed for the off-farm livestock is not considered an additive or component of the manure. Documentation regarding the contents of manure is generally not required unless contamination is suspected.*

4. Seed & Planting Stock Sourcing [NOP §205.204(a)(1)]

NOP standards state 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. Organic crops are defined as anything planted on certified ground, including cover crops, green manure, catch crops, or others not planned for sale.

A producer may determine that seed is not commercially available based on appropriate form, quality, or quantity via a search of a minimum of three relevant seed suppliers to verify if organic seed from varieties equivalent to those trait selections is available. When comparing for an equivalent seed variety, consider comparable growing habits, days to maturity, insect resistance, disease resistance, flavor, milling qualities, etc., as applicable. Please note that cost of seed or shipping is not a valid reason for opting to use non-organic seeds if organic seeds are commercially available.

A good faith effort must be made each time seed is purchased to source organic seeds. If using non-organic seeds, documenting your attempts to source organic seeds must be part of your recordkeeping system.

Please contact OEFFA if you plan to import seeds, seedlings, or planting stock from outside the U.S. as additional documentation may be required.

All seeds planted on certified organic land must be organic unless no equivalent organic seeds are available. When purchasing nonorganic seeds or planting stock, each grower must first document a search for organic seed/stock. Once you have decided on the crops and varieties you want to plant, contact at least three sources that sell organic seed/stock and ask for a variety that has the characteristics you are looking for. These attempts to find organic seed must be documented. If none of these dealers carries the organic version with the qualities or in quantities you need, you may purchase nonorganic seed/stock that is untreated and non-GMO. Make sure you receive documentation of this from the supplier. Under the NOP, cost may not be a factor in deciding whether to purchase organic or untreated and non-GMO seed/stock. Trials and test strips may be used by producers to evaluate organic varieties for equivalency with preferred non-organic varieties.

5. Application of Secondary Nutrients & Micronutrients for Soil Fertility

[NOP §205.200, §205.203(b), §205.601(j), §205.602(c)]

Organic operations must maintain or improve soil quality, must manage soil fertility through the application of plant and animal materials, and may use mined substances. Under limited circumstances, NOP rules allow for certain synthetic sources of secondary nutrients and micronutrients to be used to support the current crop and maintain production while soil improvement is underway. All formulated input products must be on your OSP and must be approved by OEFFA before use and all ingredients must be compliant with NOP rules.

Secondary Nutrients (Ca, Mg, S)

Natural sources of these nutrients are allowed except that Calcium chloride produced through the brine process is allowed only “as a foliar spray to treat a physiological disorder associated with calcium uptake” (i.e. bitter pit, blossom end rot). Documentation to support the use of Calcium chloride may include plant tissue tests or recorded observations. Elemental Sulfur may be used as a synthetic Sulfur source. Synthetic Magnesium sulfate (Epsom salt) is “allowed with a documented soil deficiency.”

Micronutrients (B, Zn, Cu, Fe, Mn, Mo, Se, Co)

Natural sources of micronutrients are allowed unless listed at NOP §205.602. Synthetic micronutrients are only allowed to maintain crop health while soil improvement is ongoing and with the restriction that “micronutrient deficiency must be documented by soil or tissue testing or other documented and verifiable method as approved by the certifying agent.” Nitrate and chloride compounds are prohibited.

Documenting Deficiencies

NOP rules require documented deficiencies to use most synthetic forms of these nutrients, as noted above. OEFFA accepts current soil tests from within the last 3 years or plant tissue tests from the current year’s crop as adequate documentation. Soil or tissue tests must show deficiencies of all synthetic micronutrients planned for use in all areas where they will be used.

Nutrient levels detected in soil or tissue samples below the “desired,” “minimum,” “good,” “normal” (or equivalent language) reference values displayed on the tests support the use of an allowed synthetic input. OEFFA will verify that reference values are consistent with scientific research and industry consensus. When no reference values are included on the test or an associated recommendation, OEFFA will use standard values established by these same sources to determine if use is compliant.

Alternative forms of documentation may also be considered on a case-by-case basis. These include observations/monitoring, the use of check strips or test plots, etc., or some combination thereof. We also recognize that soil pH, CEC, and balancing nutrients relative to each other are

often important considerations and documentation supporting allowed synthetic input use for these purposes may be considered on a case-by-case basis.

Beyond the basic soil fertility components of N, P, and K, monitoring and applying secondary nutrients and micronutrients is an important part of a successful management plan. When soils are out of balance or lack certain necessary nutrients, NOP rules allow for the limited use of synthetic fertilizers to support the health of the current crop. Foliar feeding and applying approved liquid fertilizers through irrigation are examples of acceptable methods to support crop health. However, these practices alone do not make up a comprehensive fertility management plan. Organic growers must demonstrate they are maintaining or improving the quality of the soil with plant and animal materials. Further, NOP rules do not allow for preventive or “insurance” use of synthetic secondary nutrients or micronutrients. A wide range of soils, crops, production systems, theories of soil fertility management, and testing methods can make it difficult to determine when exactly something is “deficient.” We aim to be flexible with the documentation we accept to prove an input is needed, but producers are responsible to have site-specific information to demonstrate that they comply with NOP rules.

6. Crop Rotation [NOP §205.2, §205.205]

Understanding compliance with the NOP standards for crop rotation requires attention to multiple sections of the rule. First, crop rotation is defined in part as:

“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.”

The operator must include a plan with the OSP that shows the sequence of different crops to be planted over time and then must implement the approved plan on their certified organic fields. The same crop may not be grown in the same place for two growing seasons without interruption according to this definition.

Additionally, the crop rotation practice standard requires that the crop rotation include sod, cover crops, green manure crops, and catch crops that perform several functions for the operation including soil building, pest management, nutrient management, and erosion control. Simply alternating two cash crops or growing the same cash crop repeatedly with a cover crop in-between is not enough to demonstrate compliance with the standards. Cover crops, green manures, and/or sod are necessary to build soil organic matter and manage nutrients. Crop diversity is necessary to maintain soil fertility and prevent the proliferation of pests, weeds, and diseases over time. Perennial systems must use alternative means to introduce biological diversity into their operations such as alley cropping, intercropping, and hedgerows.

Crop rotations are required by NOP standards and are a central feature of organic farming systems. The definition of crop rotation requires that the same crop or crop family not be grown in the same field, bed, or area back-to-back. The standards also require that the crop rotation plan performs several ecological functions. Though two years of a cash crop with cover crop between may be acceptable as part of a multi-year rotation plan, alternating two crops or growing the same cash crop year after year (even with a cover crop) does not meet all of the requirements. Growers may be asked for documentation that their efforts to improve the soil, control pests, and conserve natural resources are effective if their crop rotation plans do not appear to perform these functions.

7. Drift & Flooding [NOP §205.2, §205.202, §205.400(f)(1), §205.671]

Certified organic farmers may encounter cases of unintentional drift of GMO pollen or of prohibited materials from applications to neighboring non-organic parcels. A certified operation

may become aware of drift or contaminated floodwaters by observing crop die-off or change in crop appearance along the border of their parcel, observing the actual drifting of materials during application, or through residue analysis.

For all situations where prohibited substances have drifted onto certified land, crops, livestock, or facilities, or where GMO pollen has drifted onto an organic crop in the same family, operators must do the following:

- Immediately notify OEFFA of the circumstances of the drift, including:
 - The date of the occurrence
 - The substance(s) believed to have drifted
 - The affected areas, crops, livestock, facilities, products, etc.
 - Results of any residue testing
- Investigate the causes of the drift and implement measures that will prevent the drift from reoccurring. This may mean increasing buffer zones, implementing pre-notification agreements with neighbors, etc. The certified operation's Organic System Plan must be updated with information about the additional measures implemented to prevent future drift.

If, prior to the drift incident, the certified operation had implemented the precautionary management practices of establishing reasonable buffer zones (see *Adjoining Land & Buffer Zones* policy) and clearly defined boundaries around their organic parcel(s) as described in an approved OSP, unavoidable drift from neighboring operations may not be considered an application of a prohibited material requiring a three-year transition. Crops from the affected area(s) may not be sold as organic if residue levels of prohibited materials on the crop are more than 5% of the EPA tolerance for that crop or product.

In many cases, flooding may be considered similar to drift and similar action should be taken. If appropriate buffers and diversion measures are inadequate to avoid flooding, the first step is to evaluate whether flood waters were likely to be or were contaminated by considering the source, upstream activities, etc.; testing for residues may be appropriate. Evidence of possible contamination includes oily residues on the soil surface, soil that smells of pesticides or petroleum, seeds that won't sprout or die after sprouting, crops and/or weeds are stunted/misshapen, or crops that appear to be diseased. If a well-head was submerged, well water may need to be tested to ensure that only safe, potable water is used for direct contact with produce or for livestock. If waters were not contaminated, no action is needed. If it is determined that waters were contaminated, then the current crop may not be sold as organic. If flooding with contaminated water is or becomes a regular occurrence, land may be ineligible for organic production.

If the drift or flooding was due to insufficient buffer zones or failure to implement adequate preventative measures to prevent contamination, OEFFA may issue the certified operation a Notice of Noncompliance.

This policy applies only to cases where a prohibited material has migrated from non-organic land to organic land by means of air or water. Overspray or unintentional/accidental direct application of a prohibited substance, such as by crossing a border or mistaking a field, requires a three-year transition for the affected land. Refer to the *Adjoining Land & Buffer Zones* policy for dealing with suspected or documented GMO pollen drift onto organic crops.

Section IV: Livestock

1. Dairy Herd Conversion [NOP §205.236]

A dairy herd conversion is intended to be a one-time opportunity for producers to convert an established, entire, distinct dairy herd in conjunction with the land resources that sustain it over the period of one year. It is critical that the producer develop an organic management plan prior to beginning conversion. This is to clearly identify the feed program, the land resources that will sustain the herd, and healthcare inputs that will be utilized. It is recommended that a converting operation submit an OSP to OEFFA for transitional review (at which point it will be reviewed for compliance with the NOP standards) so as to avoid surprises during the certification process. When converting a dairy operation in accordance with NOP standards, all animals of all ages must be identified and listed on the OSP. Currently, separate entire, distinct herds may be converted at a later date with OEFFA Certification approval. During the conversion, records must be maintained of feed (including the grazing areas) and health care products. In essence, a converting herd must be managed exactly like an organic herd with the exception that during the conversion, third year transition crops and forages from the producer's own land may be utilized.

Dairy producers growing their own feed are advised to consider certifying land that is eligible for organic certification ahead of their herd or, if this is not possible, to carefully review the timing of the planned conversion to ensure that there will be sufficient certified organic feed on-hand for all animals in the herd as of the conversion date.

Animals that are taken to a location that is not part of the OSP and/or is not certified lose their organic status and may not be returned to organic status.

A herd of dairy cattle may be converted from conventional to organic over a single, defined one-year period on an organic or third-year transitional farm. The herd must include all animals of all ages and all animals should convert to organic on the same date. Additional herds may be converted with OEFFA approval, but individual animals may not be converted or re-converted to organic production.

2. Physical Alterations [NOP §205.238(a)(5)]

NOP standards allow for physical alterations to benefit the welfare of animals, for identification purposes, and for safety purposes. Physical alterations must be performed on livestock at a reasonably young age and in a way that minimizes pain and stress.

Mammals

All planned materials and procedures must be listed in the Organic System Plan. Synthetic materials used for dehorning, relieving pain, etc. must be on the National List to be allowed for use. At this time, there are no synthetic substances listed for dehorning on the National List.

Poultry

Minimal beak trimming is allowed for protection of the flock and must be done in a manner that minimizes pain and stress, no later than 10 days of age. De-beaking (severe beak trimming) is prohibited.

There is no dehorning paste that we can approve under the current NOP regulations. Dehorning of animals older than 6 months will require a more detailed description of how pain and stress are minimized.

3. Teat Dips & Udder Washes [NOP §205.238, §205.603]

Teat dips may be used on a daily basis as a treatment for chapped or damaged teats, to protect animals from post-milking infection, and for the promotion of food safety. Udder washes,

pre-dips, and post-dips are classified as livestock drugs; all active ingredients must be nonsynthetic or listed at NOP §205.603 for this purpose. Non-active ingredients (excipients) may be considered approved if they meet the criteria of NOP §205.603(f). Common soap and water may also be used for an udder wash if the udder is thoroughly rinsed or wiped before milking. Allowed soaps include some hand and dish soaps without antibiotics.

Producers must be careful when selecting any input to be used on their organic operation, but teat dips can be especially tricky. Please confirm with the OEFFA Approved Products List or contact us before using a new or different teat dip. Soap and water may be used as an udder wash before milking but be sure the soap is not antibacterial and that the udder is rinsed and/or wiped after washing.

4. Livestock Healthcare [NOP §205.238, §205.238(a)(2), §205.603(d)(2-3)]

Treatment may not be withheld from a sick animal in order to preserve its organic status. All animals, including young stock, treated with prohibited drugs will permanently lose organic status and may never return to organic production (animals cannot be reconverted).

Animals treated with prohibited drugs must be clearly identified as separate from organic animals. All meat, milk, or milk products from treated animals must be segregated from organic products and there must be clear documentation of the separation. Any dairy animal treated with prohibited drugs may not return to the milking herd, even if the animal is managed organically and remains on the organic farm after treatment. The milk from an animal treated with prohibited substances may not be used to feed organic young stock except its own, provided the animal was managed organically during the last third of gestation. The milk from an animal treated with an allowed substance that requires a withholding period (such as lidocaine or parasiticides) may be fed to on-farm livestock but may not be sold as organic during the withholding period. All treatments of sick or injured animals must be noted in animal health records.

Vitamins and minerals necessary to meet the nutritional requirements of organic livestock must be provided as part of the feed ration. Nonsynthetic and synthetic vitamins and minerals are allowed as feed additives in organic livestock feed and in healthcare and drug products if FDA approved. The Association of American Feed Control Officials (AAFCO) Annual Publication may also be used to identify acceptable vitamin and mineral feed additives. Injectable electrolytes, vitamins, and minerals may be used in drug applications, by or on the order of a licensed veterinarian, to treat a documented condition. All non-active ingredients (excipients) in these formulations must be compliant. Synthetic vitamins are not on the National List for external use. Approved livestock drugs may be used to treat a documented illness, stress, or suffering. Stress assessment may be risk-based from a farmer's experience (e.g. calcium for fresh Jersey cattle or iron for piglets) and must be documented in the OSP.

If an animal is sick you must treat it, even if that means it will need to be removed from the organic herd. Once an animal loses its organic status, you may not reconvert it to organic.

A list of vitamins and minerals approved as feed additives by FDA/AAFCO is available in the appendix of the OMRI Generic Materials List. Anything on this list may also be part of a healthcare product that is ingested orally. Injectable vitamins and minerals may be used by or on the order of a veterinarian as drug treatments and injectable electrolytes may be used to treat milk fever. However, you should be sure OEFFA has reviewed and approved the complete product before you use it.

5. Outdoor Access for Livestock & Poultry [NOP §205.239(a)(1), NOP §205.239(b)]

NOP rules require livestock living conditions that accommodate the health and natural behavior of animals, including year-round access for all animals to the outdoors, shelter, shade, and clean water. Outdoor access involves both infrastructure and management practices. Infrastructure concerns include adequate door space for animals to leave the structure, adequate outdoor space for all animals to be outside without crowding, appropriate fencing, and improvements that encourage animals to use outdoor areas. Management practices include developing a plan for temporary confinement, executing that plan, and recordkeeping.

Poultry

Each poultry operation is required to submit an outdoor access plan as part of their OSP. Outdoor access for poultry includes access to soil, with maximal vegetative cover as appropriate for the climate, season, and stage of life of the birds. Producers must maintain continual outdoor access records that demonstrate they followed that plan, identifying when the birds were allowed access to the outdoors, when they were confined, and for what purpose they were confined.

Under certain circumstances, animals may be temporarily confined in order to maintain their health, safety, or well-being. Appropriate conditions for temporary confinement are as follows (note that additional considerations are described in the NOP rules cited above):

- *Treatment of illness or injury.* The illness or injury must be well documented in both health records and the outdoor access records.
- *Weather.* The National Organic Standards Board recommends poultry have access to the outdoors between the temperatures of 40° and 90° Fahrenheit. These temperatures can vary slightly, based on the conditions at each operation. Other inclement weather that can cause physical harm may also be considered and should be described in the OSP. Production yields or growth rates of livestock lower than the maximum achievable do not qualify as physical harm.
- *Stage of life.* Pullets under the age of 16 weeks may be denied outdoor access while still under a heat lamp and feathers are growing, after which access to the outdoors should be available. Additionally, layers may be denied outdoor access during an approved and documented eight-week nest training period.
- *Protection of soil and water quality.* Outdoor access may be limited if there is a risk to soil or water quality due to the presence of poultry, including the case of recently seeded pasture.

Swine

Swine should be housed in a group, except sows individually at farrowing, boars, and swine with documented instance of aggression or recovery from an illness. Piglets should not be kept on flat decks or in piglet cages.

Outdoor access for swine must be provided to allow swine to express natural behaviors such as rooting, chewing, mouthing, pawing, and other oral/nasal/facial behaviors. Access may include a ranging and foraging area comprised of concrete, soil, and/or vegetative cover as appropriate for the climate, season, and protection of soil and water quality. Materials should be provided to allow swine to engage in natural rooting behaviors, except during farrowing and suckling. Toys such as balls and ropes may be provided for enrichment but do not substitute for rooting materials.

Producers must maintain continual outdoor access records identifying when the hogs were allowed access to the outdoors, when they were confined, and for what purpose they were confined.

Tie Stall Barns

Producers with tie stall dairy barns must ensure that all animals have adequate daily access to the outdoors. Tie stall infrastructure can be limiting and often requires more intensive management by the producer to comply with the standards, particularly during the winter. Animals must be put outside daily for a substantial portion of the day. Confinement is allowed only per the exceptions described at 205.239(b) and must be documented.

All certified organic animals must have year-round access to the outdoors. Animals may be denied outdoor access if there is a risk to health or to soil and water quality. The producer must document the conditions under which animals will be confined and document their adherence to that plan. Dairy producers with tie stall barns must make every effort to get animals outdoors during the winter -- an hour of exercise is not considered adequate outdoor access. Planning ahead is essential to complying with the organic standards, especially for operations applying for certification for the first time.

Section V: Handling

1. Organic Ingredient Search Documentation for Products Labeled “Organic”

[NOP §205.301(b)]

Products certified under the “Organic” labeling category must contain at least 95% organic ingredients. Non-organic agricultural ingredients may be used in the remaining 5% if all of the following criteria are met:

- The ingredient is listed in NOP §205.606 (or in the cases of yeast and flavors, §205.605) of the National List.
- The operation has demonstrated the ingredient is not commercially available as organic in the form, quality, or quantity needed by checking with a minimum of 3 relevant suppliers (see definitions).
 - Please note that the cost of ingredients or shipping is not a valid reason for opting to use non-organic ingredients if organic ingredients are commercially available.
- This search must be documented. Have this information available for review during your organic inspection. Exception: when requesting certification of a new product which includes non-organic agricultural ingredients, this documentation must be sent to OEFFA Certification. You may use OEFFA’s sample form titled *Organic Ingredient Search Record for Handlers*.
- You have obtained documentation that the ingredient is: non-GMO, non-irradiated, and produced without the use of sewage sludge. You may use OEFFA’s sample form titled *Non-Organic Ingredient Form*.

For continued approval of the nonorganic ingredient, you must have a procedure in place to regularly search for an organic version.

2. Labeling & Marketing

When OEFFA discovers an error in labeling of an OEFFA certified organic product, a noncompliance may be issued and the operation must submit label corrections. Any incorrect labels that have not entered the stream of commerce may not be used if they include the following errors:

- (1) Improper use of the USDA organic seal
- (2) Incorrect product classification such as a “made with organic [ingredients]” product labeled “organic”
- (3) Omission of the statement: “Certified Organic by OEFFA,” when required

Other errors will be reviewed on a case-by-case basis. Certified operations may continue to use labels with minor errors only for the time necessary to procure corrected labels, up to 90 days. OEFFA Certification and the operation must keep documentation of this in their respective files. Minor errors might include incorrect formatting or placement of information.

OEFFA Certification (as a USDA-accredited certification agency) does not have recall authority for product already in the stream of commerce.

3. Handling Certification for Producers

All operations that OEFFA Certification serves handle organic products. Food processors are generally only certified to the handling scope. Many farmers are certified to the crop and/or livestock scope but not the handling scope. Post-harvest handling of crops and livestock products by producers is common and in many cases is covered by the producer OSPs and inspection. When producers process agricultural products beyond their raw state, handling certification is required. OEFFA Certification offers a discounted handling certification for operations that are also certified as producers. When the handling portion of a producer's operation is particularly complex, high-volume, and/or handles primarily products from off the farm, this discount does not apply.

The following criteria are used as guidelines to determine when producers need to be certified to the handling scope and when these producers are eligible for the producer-handler discount:

I) If an OEFFA certified organic producer also has a handling/processing operation on-farm that handles some of their own raw products and:

- A) The producer is processing crop/product for his or her own use:
The producer does not need to specifically certify the handling/processing portion of the operation. The producer must fully describe the handling/processing in their OSP, protect organic products from contact with prohibited substances, and maintain records documenting handling activities. Practices and records will be verified during the inspection.
- B) The producer is processing crop/product for sale:
The producer must complete the *OEFFA Organic System Plan for Handlers* (at a significant fee reduction). The operation will receive one organic certificate for both their farm and handling/processing facility.

II) If an OEFFA certified organic producer also has a handling/processing business that handles only raw products from off-farm and sells the handled product, or that is located at a different location than the certified organic farm:

The producer-handler discount does not apply. The operation must complete the *OEFFA Organic System Plan for Handlers* and pay the appropriate handling certification fee. OEFFA Certification will determine whether the operation can be managed with a single file, inspection, and certificate or if each must be handled separately to ensure the certification process is manageable and organic integrity can be verified.

III) If an OEFFA certified organic producer also has custom handling/processing done:

- A) On-farm for his or her own use: See IA above. The custom work must be fully documented in the *OSP for Producers*. The certified producer must oversee the work of the custom handler/service provider and ensure practices and records are as described in the OSP.
- B) On-farm for sale under his or her management: See IB above. The custom work must be fully documented in the *OSP for Handlers*. The certified producer must oversee the work of the custom handler/service provider and ensure practices and records are as described in the OSP.

- C) Off-farm: The off-farm operation must be certified organic for the crop/livestock/product to maintain its organic status. The producer must have an organic certificate for the off-farm operation.

OEFFA Certification may require further paperwork and/or waive the producer-handler discount for complex or high-volume operations to ensure we have the necessary information and resources to verify compliance with NOP regulations.

This policy is meant to assist staff and producers that also handle organic products in determining which forms and fees they must submit. Examples are as follows:

- IA: A producer grinds feed for his/her own livestock.
- IB: A producer processes sap to market organic maple syrup, slaughters their own poultry for eventual sale, or cleans seed harvested from their farm to be sold to other growers.
- II: A producer grows hay and also owns a feed mill s/he would like to certify.
- IIIA: A producer hires a custom operator to come on-farm and roast his/her own soybeans to feed his/her own livestock.
- IIIB: A producer hires a custom operator to come on-farm and roast his/her own soybeans which s/he plans to sell.
- IIIC: A producer takes their clover seed to a seed cleaning facility.

4. Seed Mixes

To be certified and display the phrase “Certified Organic by OEFFA”, seed mixes must be processed in accordance with the composition requirements found under §205.301(a-c) with the following clarifications. Labels /tags must follow the labeling requirements for the respective labeling category.

- *Mixes that contain all organic (uncoated, not inoculated) seed* may be certified and labeled as *100% Organic* or *Organic*.
- *Coated and/or inoculated organic seeds or seed mixes containing coated and/or inoculated organic seeds and no non-organic seeds* may only be certified and represented under the *Organic* category (or a lesser claim).
 - Only coatings and inoculants allowed under §205.601 and not prohibited under §205.602 must be used
 - The weight of a compliant seed coating may be excluded in the organic content calculations. (These calculations are made on the Organic Product Profile Sheet).
- *Blends containing nonorganic seed with at least 70% organic seeds* may only be certified and represented under the “*Made with Organic (specified seed varieties)*” label claim. If the operation chooses to make such a claim, they must follow these requirements:
 - The mix may not contain organic and nonorganic seed of the same variety.
 - Nonorganic seeds are only permitted if:
 - An annual seed search demonstrates that they are not commercially available as defined in the NOP standards
 - They are non-GMO and not treated with prohibited substances.
 - The weight of a compliant seed coating may be excluded in the organic content calculations. (These calculations are made on the Organic Product Profile Sheet).

Mixes with less than 70% Organic Content OR containing organic and nonorganic of same variety cannot be certified. Organic seeds in these mixes may still be identified as organic in the “ingredient statement” (seed percentage listing). They may not be labeled with any other organic claims.

Section VI: Appendices

Appendix A: Import & Export Requirements

Import Requirements			
<i>Imported organic products treated with ionizing radiation or a substance prohibited by the USDA organic regulations (such as a fumigant) may not be sold, labeled, or represented as organic or organically produced or handled. Operations must have documentation to demonstrate that integrity has been maintained during transportation, as well as standard U.S. import documentation.</i>			
Trade Policy	Country or Union	Verifications <i>(Supported by supplementary documentation signed by supplier's certifier)</i>	Baseline Documentation
Equivalency Arrangements	Canada	<p><u>Prohibited:</u></p> <ul style="list-style-type: none"> -Agricultural products derived from animals treated with antibiotics 	<ul style="list-style-type: none"> -Organic Certificate to Canadian Organic Regime (COR) Standards for Canadian Operation -Documentation accompanying shipment must include the statement "Certified in compliance with the terms of the US-Canada Organic Equivalency Arrangement."
	European Union <i>EU Member Countries (current on 12/13/19): Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, and the United Kingdom.</i>	<p><u>Required:</u></p> <ul style="list-style-type: none"> -Must be produced in or have final processing or packaging performed within the EU <p><u>Requirements for organic wine:</u></p> <ul style="list-style-type: none"> -Must contain 100% organic grapes and organic ingredients. Non-organic substances not allowed under 7 CFR 205.605 are prohibited. <p><u>Prohibited:</u></p> <ul style="list-style-type: none"> -Agricultural products derived from animals treated with antibiotics -Aquatic animals (e.g. fish, shellfish) 	<ul style="list-style-type: none"> -Organic Certificate to European Commission (EC 834/2007) Standards for EU Operation -NOP Import Certificate
	Japan	<p><u>Required:</u></p> <ul style="list-style-type: none"> -Must be produced or have final processing, packaging, or labeling occur in Japan -Must be plant products or plant-based processed products 	<ul style="list-style-type: none"> -Organic Certificate to Japanese Agricultural Standards (JAS) for Japanese Operation -NOP Import Certificate
	Korea	<p><u>Required:</u></p> <ul style="list-style-type: none"> -Must be "processed products" as defined by the Korean Food Code -Final processing (as defined in the Korean Food Code) must occur in Korea <p><u>Prohibited:</u></p> <ul style="list-style-type: none"> -Products that contain livestock products produced with the use of antibiotics 	<ul style="list-style-type: none"> -Organic Certificate to Korean standards (under MAFRA) for Korean Operation -NOP Import Certificate
	Switzerland	<p><u>Required:</u></p> <ul style="list-style-type: none"> -Must be products whose final processing or packaging occurs in Switzerland -Organic wine must be produced and labeled to US regulations <p><u>Prohibited:</u></p> <ul style="list-style-type: none"> -Livestock products produced with the use of antibiotics (including all ingredients) 	<ul style="list-style-type: none"> -Organic Certificate to Swiss organic ordinances for Swiss Operation -NOP Import Certificate
Recognition Agreements	India	<p><u>Required:</u></p> <ul style="list-style-type: none"> -Must be produced in India and certified by an Indian government-accredited certifying agent to USDA NOP Organic Standards 	<ul style="list-style-type: none"> -Organic Certificate to USDA NOP Organic Standards for Indian Operation -Transaction Certificate issued through India's TraceNet System
	Israel	<p><u>Required:</u></p> <ul style="list-style-type: none"> -Must be produced in Israel and certified by an Israeli-accredited certifying agent to USDA NOP Organic Standards 	<ul style="list-style-type: none"> -Organic Certificate to USDA NOP Organic Standards for Israeli Operation
	New Zealand	<p><u>Required:</u></p> <ul style="list-style-type: none"> -Must be produced in New Zealand and certified by a New Zealand government-accredited certifying agent to USDA NOP Organic Standards 	<ul style="list-style-type: none"> -Organic Certificate to USDA NOP Organic Standards for New Zealand Operation

Export Requirements (page 1 of 2)

Trade Policy	Country or Union	Verifications (supported by incoming documentation signed by supplier's certifier)	Documentation (issued by OEFFA Certification unless otherwise noted)	Labeling Requirements
Equivalency Arrangements	Canada	<p>Required:</p> <ul style="list-style-type: none"> -Agricultural products derived from non-ruminant animals must be produced according to the stocking rates in CAN /CGSB32.310-2006 -Must be Organic or 100% Organic *See Labeling Requirements column re: Made with Organic products <p>Prohibited:</p> <ul style="list-style-type: none"> -Agricultural products produced with the use of sodium nitrate -Agricultural products produced by hydroponic or aeroponic production methods <p>The equivalence arrangement includes all USDA Organic products, regardless of where they are produced and handled.</p>	<ul style="list-style-type: none"> -Attestations that the restrictions are met can be made either by the operation or the certifying agent. However, OEFFA and many other ACA's require that handlers maintain documentation that has been signed by the suppliers' certifiers. -Documentation accompanying shipments must include the statement "Certified in compliance with the terms of the US-Canada Organic Equivalency Arrangement." 	<p>RETAIL (* = must meet additional Canadian labeling requirements)</p> <ul style="list-style-type: none"> -must state the name of the US certifying agent -must be in English and French* -may use the USDA Organic seal or the Canada Organic Biologique logo* -for products containing 70-95% organic ingredients, a % organic content statement may be displayed* -"100% Organic" products may only be labeled as "Organic" -may not use phrase "certified organic," only "organic" as product claim -additional requirements for Quebec - check with OEFFA <p>WHOLESALE (all are required)</p> <ul style="list-style-type: none"> -name and address of the person or organization responsible for production, preparation or distribution of the product -name of product and its organic status -name of certifier (or logo) -information that ensures traceability, for example the lot number -in-transit loads must include signage attached to the bin identifying product as organic
	European Union	<p>Required:</p> <ul style="list-style-type: none"> -Must be produced in or have final processing or packaging performed within the US -Must be Organic or 100% Organic *See Labeling Requirements column re: Made with Organic products <p>Prohibited:</p> <ul style="list-style-type: none"> -Crops produced using antibiotics (streptomycin for fire blight control in apples and pears). Antibiotics must not have been used for at least 3 years prior to harvests prior to 10/21/14 <p>Requirements for organic wine and wine "made with organic grapes":</p> <ul style="list-style-type: none"> -Must contain 100% organic grapes and organic ingredients. Non-organic substances not allowed under 7 CFR 205.605 are prohibited. -Must have been produced using only the winemaking practices and substances detailed in the EU Organic regulations 	EU Import Certificate ("Certificate of Inspection...")	<p>RETAIL (* = must meet additional EU labeling requirements)</p> <ul style="list-style-type: none"> -must meet EU labeling requirements -must state the name of the US certifying agent (in the form of the EU assigned code) -may use the USDA Organic seal or the EU Organic logo* -for products with less than 95% organic ingredients, a % organic content statement may be displayed -"100% Organic" products may only be labeled as "Organic" <p>WHOLESALE (all are required)</p> <ul style="list-style-type: none"> -name and address of operator, and where different, owner or seller of product -name of product and its organic status -name or certifier (or its EU control number) -lot number
	Korea	<p>Required:</p> <ul style="list-style-type: none"> -Must be "processed products" as defined by the Korean Food Code -Must be products whose final processing (as defined in the Korean Food Code) occurs in the US -Must contain at least 95% organic ingredients <p>Prohibited:</p> <ul style="list-style-type: none"> -products that contain apples or pears produced with the use of antibiotics 	NAQS Import Certificate of Organic Processed Foods	<p>RETAIL (* = must meet additional Korean labeling requirements)</p> <ul style="list-style-type: none"> -must meet Korean food labeling requirements -must include the certificate number (use operation's certification number) -may display the Korean organic food label* and/or USDA organic seal -must include the statements 'Manufactured by', 'Packaged in: USA', and telephone number of the seller/importer <p>WHOLESALE (all are required)</p> <ul style="list-style-type: none"> -name and address of certified operation -name of product and its organic status -name of certifier (or logo) and operation/certification number -lot number -meet Korean food labeling requirements

Export Requirements (page 2 of 2)

Trade Policy	Country or Union	Verifications <i>(supported by incoming documentation signed by supplier's certifier)</i>	Documentation <i>(issued by OEFFA Certification unless otherwise noted)</i>	Labeling Requirements
Equivalency Arrangements	Japan	<p>Required:</p> <ul style="list-style-type: none"> -Must be produced or have final processing, packaging or labeling occur in the US -Must be plant products or plant-based processed products <p>Prohibited:</p> <ul style="list-style-type: none"> -Must not be "Made with Organic" products (no less than 95% organic content) 	Export Certificate (TM-11)	<p>RETAIL</p> <ul style="list-style-type: none"> -must include the JAS Seal and comply with the Japanese Ministry of Agriculture, Forestry and Fisheries requirements for the use of the JAS Seal (including rules regarding who applies the seal) -must include the certificate number (use operation/certification number) -must be in Japanese but a translation sticker could be applied in Japan as long as the organic seal is not modified in any way by an uncertified distributor -country of origin must be identified on labels <p>WHOLESALE (all are required)</p> <ul style="list-style-type: none"> -name and address of the person or organization responsible for production, preparation or distribution of the product -name of product and its organic status -name of certifier (or logo) -information that ensures traceability, for example the lot number -in-transit loads must include signage attached to the bin identifying product as organic
	Switzerland	<p>Required:</p> <ul style="list-style-type: none"> -Products must have final processing or packaging occur in the US -Must be Organic or 100% Organic *See Labeling Requirements column re: Made with Organic products -Organic wine must be produced and labeled to Swiss regulations 	Swiss Certificate of Inspection	<p>RETAIL</p> <ul style="list-style-type: none"> -must meet Swiss organic labeling requirements -may display the USDA Organic seal -for products with less than 95% organic ingredients, the reference to organic may only appear in the list of ingredients and the overall percentage of organic ingredients must be stated on the ingredient panel -"100% Organic" products may only be labeled as "Organic" <p>WHOLESALE (all are required)</p> <ul style="list-style-type: none"> -name and address of certified operation -name of product and its organic status -certifier's EU control number -lot number -meet Swiss organic labeling requirements
Export Trade Relationship	Taiwan	<p>Required:</p> <ul style="list-style-type: none"> -Must be produced in the US or US territories -Processed products and crops must be produced and/or processed using zero prohibited substances -Livestock and meat products must be managed and produced without the use of systemic pain killers or analgesics, including Lidocaine and Procaine <p>Prohibited:</p> <ul style="list-style-type: none"> -Must not be "Made with Organic" products (no less than 95% organic content) 	Export Certificate (TM-11) (aka Transaction Certificate)	(none specified)