



Organic Certification Process

A Publication of ATTRA - National Sustainable Agriculture Information Service • 1-800-346-9140 • www.attra.ncat.org

By Ann Baier
NCAT Agriculture
Specialist
© NCAT 2005

This guide is to help organic producers and handlers understand, prepare for, and get the most from the process of organic certification to USDA National Organic Standards (see www.ams.usda.gov/nop). It discusses the purposes and benefits of the inspection for organic certification, provides a general description of the organic certification process, and outlines the role of the organic inspector. A companion ATTRA publication, *Preparing for an Organic Inspection: Steps and Checklists*, is written for those already familiar with the basic certification process, to help them prepare more systematically for an initial or annual inspection. It includes steps for preparing for the organic inspection and checklists of audit trail documents and required records for certification of organic crop and livestock production and handling facilities.

Contents

Purposes and Benefits of the Organic Inspection.....	2
Steps to Organic Certification.....	3
The Role of the Organic Inspector.....	5
Resources.....	6

Organic certification provides third-party confirmation that a production or handling operation is in compliance with organic standards. Certification enables qualified producers and handlers to market agricultural products under a USDA certified organic seal. In its simplest terms, the organic seal assures the consumer of organic integrity. First, a product is grown in an organic production system that emphasizes plant and animal health, preven-



The author (right) conducting a field inspection with Delfina Córcoles and her daughter. Photo by Rex Dufour, NCAT.

tative management of pests, and judicious use of allowed materials. Then, the product is tracked and protected from contamination from the field to final sale, whether it is a raw agricultural commodity or a multi-

ingredient processed product. The label may carry a claim of “100 percent organic,” “Organic” (95% to 100%), or “Made with organic ingredients” (at least 70% organic ingredients).

As an organic inspector, I have heard from both farmers and food processors that an important benefit of organic certification is that it requires and inspires them to keep better records. Records help identify and solve problems more readily. A newly certified organic bakery described how the organic certification process immediately paid off in that business.

- The bakery was having problems with one type of organic bread they were baking. Several batches did not rise properly. The resulting loaves did not have good texture and could not be sold. The bakers turned to the record-keeping system they had recently put into place for their organic certification. This audit trail allowed them to track every ingredient to its source. They looked at their batch sheets and found that they could trace the problem back to a certain

(continued on page 2)



(continued from page 1)

lot-number of flour. They contacted the supplier and asked not to be sold that particular lot-number of flour in the future. Their bread quality quickly returned to its usual high standards.

Dairy farmers describe how their record keeping helped them maintain healthier herds and good milk production, after their first year of organic certification.

- Gary and Patricia Belli of Belli Dairy in Ferndale, California, noticed a drop in their herd's milk production. They were keeping track of their purchases of organic feed, with lot numbers and amounts delivered from various sources. By looking at their feed purchase records, they could see the relationship between the decrease in production and the time when they used feed from a certain source. They asked their supplier to avoid a feed lot that appeared to be of poor quality. When they resumed feeding better quality feed from other lots, their milk production problem was solved.
- Robin and Maralyn Renner (brother and sister) manage Diamond R Ranch in Ferndale, California. They run the family dairy and raise organic beef. They described how much healthier their herd was once they began operating as a certified organic operation. Organic certification required that they keep accurate and more detailed records. They said that after working with these records for several months, "We began to recognize patterns." Better records helped them to connect the dots. They saw correlations and discerned causes and consequences. They improved their organic production system by putting what they learned into practice. When I spoke with him recently, Robin reiterated what Maralyn had articulated a year or two earlier: there are practical benefits to keeping the records required for organic certification. Their cows are healthier and they have better farm management. "We're glad we did it," he said. "Every year gets better."

—Ann Baier, organic inspector

Related ATTRA Publications

Preparing for an Organic Inspection: Steps and Checklists

NCAT's Organic Crop Workbook

NCAT's Organic Livestock Workbook

Purposes and Benefits of the Organic Inspection

The organic inspection doesn't need to be scary, stressful, or onerous. The inspection process can be useful to producers of crops or livestock, and processors or handlers of agricultural products. The organic inspection is a unique opportunity because it involves the most face-to-face contact between the producer or handler and an inspector who works for the certifier.

Organic certifiers conduct annual inspections of all their clients (certified parties) to verify, through on-site review of actual activities and the corresponding records, that the clients are in compliance with the relevant organic standards. Every USDA-accredited certification agency must make annual inspections. Most inspections are scheduled with the client in advance; however, some inspections are unannounced. This publication will help you incorporate management practices that will keep you prepared for an inspection at any moment.

Benefits of the inspection process for organic certification include the following.

- Building consumer confidence in the meaning of the organic label
- Fulfilling requirements to get or maintain organic certification
- Improving farm record-keeping systems and keeping up-to-date records
- Providing an opportunity to better understand organic standards
- Getting updated information about allowed and prohibited materials
- Learning about public educational opportunities or sources of information and technical assistance available through your certifier, Cooperative Extension, local farm organizations, or industry networks. (Please note that this is not part of the inspection, but an incidental benefit. The role of the inspector is discussed below.)

The steps that help you prepare for your inspection for organic certification will also help you maintain healthy farming systems and viable business practices.

Steps to Organic Certification

Step 1: Selection of a certifier

The producer or handler chooses a certifier and requests an application packet. USDA-accredited certification agencies (ACAs or certifiers) are listed on the NOP Web site (www.ams.usda.gov/nop/Certifying_Agents/Accredited.html). All USDA-accredited certifiers—whether private (non-profit or for-profit) or governmental—certify to the same USDA National Organic Standards. Some certifiers, however, are better recognized in the organic industry/marketplace, and some may offer certification to additional standards—such as International Foundation for Organic Agriculture (IFOAM), European Union (EU), Japanese Agricultural Standards (JAS), Conseil des appellations agroalimentaires du Québec (CAAQ), Biodynamic, GAP, Kosher, or Fair Trade—while other certification agencies may provide services such as newsletters, workshops, or educational opportunities. Consider your marketing needs—whether your approach to marketing requires verification of compliance to other standards—as well as your personal interests.

Step 2: Application and submission of an organic systems plan

The producer or handler submits an application and an Organic System Plan (OSP) to the certification agency, using the certifier's forms and guidelines and attaching any requested documentation, licensing agreements, and fees. The OSP consists of written plans and relevant information concerning all aspects of your operation. Following are some examples of required information.

- **Crop Production:** Land use history documentation, field maps, crop rotation plans, soil improvement and pest management plans, seed sources, material inputs (soil amendments, fertilizers, compost, manure, pest control materials, or any other materials) used and planned for use, measures to maintain organic

integrity (with regard to borders and buffers, application, planting and harvest equipment, post-harvest handling and storage), planting, production, harvest and sales records, monitoring systems, and product labeling.

- **Livestock Production:** Source of animals, feed and feed supplements, description of housing and living conditions, health care practices and materials, management practices (i.e., access to the outdoors and pasture for ruminants), physical alterations, manure management, record-keeping system, and product labeling.
- **Handling Operations:** Sources of ingredients and processing aids, materials and standard operating procedures for cleaning, sanitation, and pest control, measures to protect organic integrity (prevention of commingling and contamination), packaging, record-keeping system, product formulations, and product labeling.



An Organic System Plan should include information about management practices such as animals' access to pasture and outdoors. The pastured layer hens at left belong to Paul and Leti Hain of Tres Pinos, California. Photo by Ann Baier.

Step 3: Application and Organic System Plan Review by the Certifier

The certifier reviews the Organic System Plan (OSP) and accompanying documentation for completeness and assesses the applicant's capacity to operate an NOP-compliant operation. The certifier determines that the operation can meet the requirements for certification as outlined in the OSP. The certifier will then assign a qualified organic inspector to do an on-site inspection.

Organic inspectors assess the adequacy of procedures to prevent contamination.
Photo by Ann Baier.



Step 4: Organic inspection

Organic inspections come prior to initial certification, then annually thereafter. The inspection must occur when a person knowledgeable about the operation is present, and should occur where and when the crops, livestock, and/or processing or other handling can be observed.

The Inspection Preparation Checklists in the ATTRA publication *Preparing for an Organic Inspection: Steps and Checklists* provide a detailed description of the documentation required for the three major types of operations: crops, livestock, and handling. In all three types of operations, the organic inspector conducts an on-site inspection and review of record keeping to verify that the OSP accurately reflects your operation and is in compliance with NOP standards. Records to be verified include input materials, production, harvest and sales records, as well as appropriate product packaging and labeling. The inspector assesses the risk of contamination from prohibited materials, and may take soil, tissue, or product samples as needed.

- The farm (crop) inspector inspects fields, soil conditions, crop health, approaches to management of weeds and other crop

pests, water systems (for irrigation and post-harvest handling), storage areas, and equipment.

- The livestock inspector inspects feed production and purchase records, feed rations, animal living conditions, preventative health management practices (vaccinations and other medications currently being used or planned for future use), and health records. The inspector observes and assesses the animals' condition.
- The handler or processing inspector inspects the facility and evaluates the receiving, processing, and storage areas used for organic ingredients and finished products. Critical control points are an essential part of any handling operation and its inspection. The inspector analyzes potential hazards and assesses organic control points—the adequacy of procedures to prevent contamination (from sanitation supplies, pest management materials, or non-organic processing aids), and to prevent commingling with non-organic ingredients.

At the end of the inspection, the inspector conducts an exit interview with the inspected party to confirm the accuracy and completeness of the inspector's observations. The inspector will review any requests for additional information and any issues of potential non-compliance with respect to the National Organic Standards. The inspector provides the inspected party with a written copy of the exit interview before leaving the inspection. The inspector then provides a report to the certifier. The inspector reports his or her observations only and does not make the certification decision.

Step 5: Review of the inspection report by the certifier

The certifier will review the report and determine whether the operation is eligible for organic certification. The final decision is then communicated in writing to the client seeking certification, along with any requirements for initial or continuing certification. The certifier may request

further information or remediation, or issue a notice of noncompliance, if the operation is not in full compliance with all pertinent organic standards. Significant noncompliances may result in denial or revocation of certification and/or require correction prior to organic certification or renewal. Minor non-compliance issues are those that do not threaten the integrity of the organic products. (For example, procedures are properly carried out but inadequately documented.) The notice will cite the issues of concern and specify the time by which the operation must remedy the noncompliance and provide documentation of the remediation to the certifier.

Step 6: Organic certification

A certificate of organic certification is issued if the operation is determined to be compliant under the NOP (and any other applicable) standards. Upon issuance of the organic certificate, the operation may begin selling its products as organic. Product labels must identify the certifier (“Certified organic by...”) beneath the name and identifying information of the producer or handling company. Use of the USDA and/or the certifier’s seal is optional. The certified party should review the details of labeling in NOP section 205.300-311, and ask the certifier to review any labels prior to printing. All certified operations must be inspected annually.

The Role of the Organic Inspector

The “inspector” is not the same as the “certifier.” It is important for the producer or handler to have clear expectations about the role of the inspector—what services he or she can and cannot provide. As noted in Step 4: Organic Inspection, the primary role of the inspector is to gather on-site information and provide an accurate report to the certifier. The inspector verifies a) whether observations of an operation’s daily practices are consistent with the client’s Organic System Plan (previously submitted to and

approved by the certifier), b) whether the practices and inputs are in compliance with the USDA National Organic Standard, and c) whether those practices and inputs are adequately documented. The certifier then makes the certification decision based on information provided in the OSP, the inspection report, and associated documents.

The inspector can do the following:

- provide information about the certification process
- answer general questions about organic standards and requirements
- explain the range of practices and/or record keeping that the certifier considers sufficient to show compliance
- make referrals to public sources of information, such as Cooperative Extension services, USDA agencies, farm organizations, trade associations, and ATTRA’s toll-free line and publications

The inspector cannot serve as your advisor or consultant. The inspector may not recommend specific products, practices, animal or plant varieties, or give advice for overcoming identified barriers to certification. The inspector must not hold a commercial interest in the business being inspected, provide paid consulting services, accept gifts, favors, or payments other than the prescribed inspection fee. Finally, the inspector does not make the certification decision. Any of the above constitutes a conflict of interest that is strictly prohibited by law, as described in NOP Section 205.501.

The certified entity can be assured that the inspector has signed both a conflict of interest and a confidentiality agreement with the certifier to protect all proprietary information of the inspected operation.

Even when you take into consideration the limitations of the inspector (as described



*The organic inspector can refer clients to sources of information about organic compliance.
Photo by Ann Baier.*

above), the inspection can still be a useful opportunity to expand your knowledge of organic requirements, the processes necessary to meet those requirements, and associated information. As you prepare for your inspection, you might find it helpful to make notes of any

questions you have, in particular about the certification process and where to go for assistance in answering further questions. To avoid potential conflicts of interest, please be aware of the limitations on the role of your inspector.

Resources

The National Organic Program (NOP)
www.ams.usda.gov/nop

Organic Materials Review Institute
www.OMRI.org

International Federation of Organic
Agriculture Movements
www.ifoam.org

Biodynamic Farming and Gardening Association
www.biodynamic.org.nz/demeter.html

International Organic Inspection Manual IFOAM and
IOIA, December 2000. Order from:

Independent Organic Inspector's Association
(IOIA)
P.O. Box 6
Broadus, MT 59317-0006
406-436-2131 telephone/FAX
ioia@ioia.net
www.ioia.net

Acknowledgements

Thanks to Brian Magaro and Lois Christie, organic inspectors who provided their pre-inspection letters as resources for developing this publication.

Appreciation to the following reviewers:

Lois Christie, Fiesta Farms

Doug Crabtree, Montana Department of Agriculture, Organic Certifier

George Kuepper, Program Specialist, NCAT

Nancy Matheson, Program Specialist, NCAT

Jim Riddle, Organic Independents

Jeff Cunningham, Organic Inspector

Organic Certification Process

By Ann Baier
NCAT Agriculture Specialist
©NCAT 2005

Paul Williams, Editor
Robyn Metzger, Production

This publication is available on the Web at:
www.attra.ncat.org/attra-pub/organic_certification.html
or
www.attra.ncat.org/attra-pub/PDF/organic_certification.pdf

IP 262
Slot 266
Version 112905