

Frequently Asked Questions - Organic Farms

Additional FAQs can be found online at www.ccof.org/cert-faq.php

Standards updates and other resources: www.ccof.org/Certification_Updates_Resources.php

Q: What is the Organic System Plan (OSP)?

A: The Organic System Plan (OSP) is a detailed description of the practices and procedures used by your operation to produce organic goods. The National Organic Program (NOP) requires that every certified operation have a complete, accurate OSP. Your OSP functions as your initial application for certification, and, once approved, becomes a contract between you and CCOF that explains how you remain in compliance with organic standards. It only needs to be filled out once, but each year your CCOF inspector will verify that your operation is acting in accordance with the OSP, so it must be updated if any changes are made. Blank templates can be downloaded from the CCOF website at www.ccof.org/osp.php or sent to you by CCOF staff.

Q: How do inspections work?

A: The purpose of an inspection is to verify that your practices are in compliance with the National Organic Program and any international requirements you request by confirming that your Organic System Plan (OSP) accurately describes your actual practices and procedures. New applicants must have an initial inspection to become certified; existing clients will be inspected annually to maintain their certification. An inspection also occurs if you add acreage or a new facility to your operation. You will be contacted by an inspector to set up an appointment when an inspection is required. Any questions about your inspector or the scheduling of inspections should be directed to your Regional Service Representative (RSR).

You should be as prepared as possible for your inspection. Since you will be billed by the hour, the more prepared and organized you are, the less expensive the inspection will be. Inspectors will collect many kinds of specific information about your operation, which is used by CCOF to verify your certification. Your complete OSP, including all attachments, should be clear and readily available. Make sure all personnel, facilities, and any other necessary documentation are accessible.

During the inspection, your inspector must be able to test your “audit trail”, which requires records of all purchases, internal movement, and sales of inputs, ingredients, intermediates, and final products. Operations who sell organic and non-organic should have separate records for both types of products. Performing an audit can be a time intensive part of your inspection if your records are difficult to comprehend. In addition to your audit trail, please have available your input records, documentation of cleaning and purging of equipment, buffer crop disposal, organic seed sourcing, and any other activities. Remember that incomplete or confusing records may increase the cost of your inspection. Another way to reduce the cost of inspections is to be flexible about the scheduling. If an inspector can perform multiple inspections in the same area at the same time, the cost of travel time can be shared among all clients.

The inspector may request additional information from you during the inspection. Please respond to these requests promptly. If you are able to reply within 10 days, this information can be sent directly to your inspector and be included in the inspection report. If this takes longer, you should send it directly to the CCOF office.

Q: What buffers are required between organic and non-organic fields?

A: The National Organic Program (NOP) does not have specific requirements about the distance between an organic and non-organic field. Many factors can influence the buffer requirements in your particular situation, such as slope, prevailing winds, neighboring land use, physical barriers, management practices, etc. The NOP does require that you describe your plan for preventing contamination, including adequate buffer zones, in your OSP.

Q: What materials/inputs can I use in organic production?

A: There is a “National List” of allowed and prohibited substances that was created according to standards developed by the National Organic Program (NOP). Natural substances are permitted unless they are specifically banned (e.g. arsenic, lead salts, etc.) and synthetic substances are prohibited unless specifically allowed.

However, the National List is complicated and it is difficult to determine whether specific formulations of finished products (like the kind you can buy at the ag supply store) are allowed or prohibited. For this reason, the Organic Materials Review Institute (OMRI) and the Washington State Department of Agriculture (WSDA) publish “materials lists” that evaluate these products against NOP standards and determine whether or not they are appropriate for use in organic production. These lists can be found at:

www.omri.org/OMRI_products_list.html (OMRI) and <http://agr.wa.gov/FoodAnimal/Organic/MaterialsLists.htm>.

If you decide to use an OMRI- or WSDA-listed product, it is critical to let CCOF know in advance so we can approve it for use in the context of your OSP. In addition, CCOF will determine whether or not a given material is allowed on an individual basis when you submit a Materials Review Request Form and the necessary documentation to the CCOF office.

Please see the Materials Information section in this packet for more detail and a copy of CCOF's Materials Review Request Form. It is also available online at: www.ccof.org/forms.php

Q: What is required for record keeping?

A: Record keeping is an essential part of the organic certification process. The regulations do not say exactly how these records should be kept, so you are free to use whatever system works best for you. Your Organic System Plan (OSP) indicates which records you need to maintain. However, some farmers and processors have difficulty keeping records that are clear, accurate, and thorough enough for CCOF to make a certification decision. For this reason, CCOF has a number of sample forms available for you to make copies of and use directly in your operation. In this packet, there are sample forms to help you keep track of seed plantings, farm inputs, equipment cleaning, harvest activities, and more. CCOF can provide you with other sample forms at your request. In addition, ATTRA has created a number of sample forms which can be found on their website: <http://attra.ncat.org/organic.html>

Q: What are the organic labeling requirements?

A: There are three major categories of labeling of organic products. The "100% Organic" label may be used on any processed product that is entirely organic. "Organic" may be used to label raw agricultural products (i.e. organic apples) and processed products that are at least 95% organic. The "Made with Organic [ingredients]" label is used for products that are at least 70% organic, as long as the remaining non-organic ingredients do not include GMOs (genetically modified organisms), are not irradiated, and are not grown using sewage sludge. Products that contain less than 70% organic are also covered in the NOP, but producers of these products are not required to be certified. There are some fine points regarding processing aids and use of certain ingredients that influence labeling, so labels should be submitted to CCOF for approval before they go to print to avoid costly mistakes.

Any product labeled "100% Organic", "Organic", or "Made with Organic [ingredients]" must include the name of the certifying agent that certified the handler of the finished product. This must appear on the information panel below or in close proximity to the name of the handler or distributor of the product, with no other wording or graphics in between. The statement should read "Certified organic by CCOF" or "Certified organic by California Certified Organic Farmers". Products labeled "Organic" or "Made with Organic [ingredients]" must clearly identify organic ingredients as organic on the ingredient panel. All other labeling is optional, unless, of course, it is prohibited.

The USDA has created a table to help you determine what must and must not be included on labels and what is optional for each labeling category. This can be found online at www.ams.usda.gov/nop/ProdHandlers/LabelTable.htm

Q: Are there resources to help farms maintain organic certification and stay informed?

A: Yes, CCOF prints a quarterly magazine and periodic updates that provide detailed information on certification issues and include helpful articles on various issues regarding organic standards and compliance. These resources are provided free of charge to all CCOF clients and supporting members. Past articles can be accessed through our online magazine archive.

As an accredited certifier, CCOF cannot provide consulting assistance. However, we maintain a list of organic consultants and agricultural advisors who can assist you with organic certification and regulatory compliance issues. Contact information for these resources can be found in the "Organic Consultants" section of this packet as well as on our website.

The ATTRA organization's organic production website provides numerous publications to help farmers, processors, and others learn about and prepare for organic production and certification. The University of California's Western Region Organic Farming Compliance Handbook is also a very good resource for organic farmers and agricultural professionals. Contact information for these and other useful organizations can be found in this packet.