

Insights from an Organic Certifier

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Presentation Outline

1. Who is Oregon Tilth?
2. Certification Overview
3. Certification Process
4. Key Regulatory Requirements of USDA NOP
5. Common Misconceptions
6. Common Mistakes



Our Mission and Vision

Mission: Oregon Tilth, Inc. is a 501(c)(3) nonprofit organization that supports and promotes biologically sound and socially equitable agriculture through education, research, advocacy, and certification.



We envision a world where agriculture and food systems work for the benefit of people and the environment



Oregon Tilth Team

- Proud to have talented, passionate and dedicated staff
- 39 Staff Total
 - 22 Certification
 - 5 Education
 - 12 Administrative



- Use approximately 45 independent inspectors
- Board of Directors (7 volunteer positions)



Oregon Tilth Certified Organic (OTCO)

Farms
ORGANIC CERTIFICATION PROCESS



Processors, Handlers
& Distributors
ORGANIC CERTIFICATION PROCESS

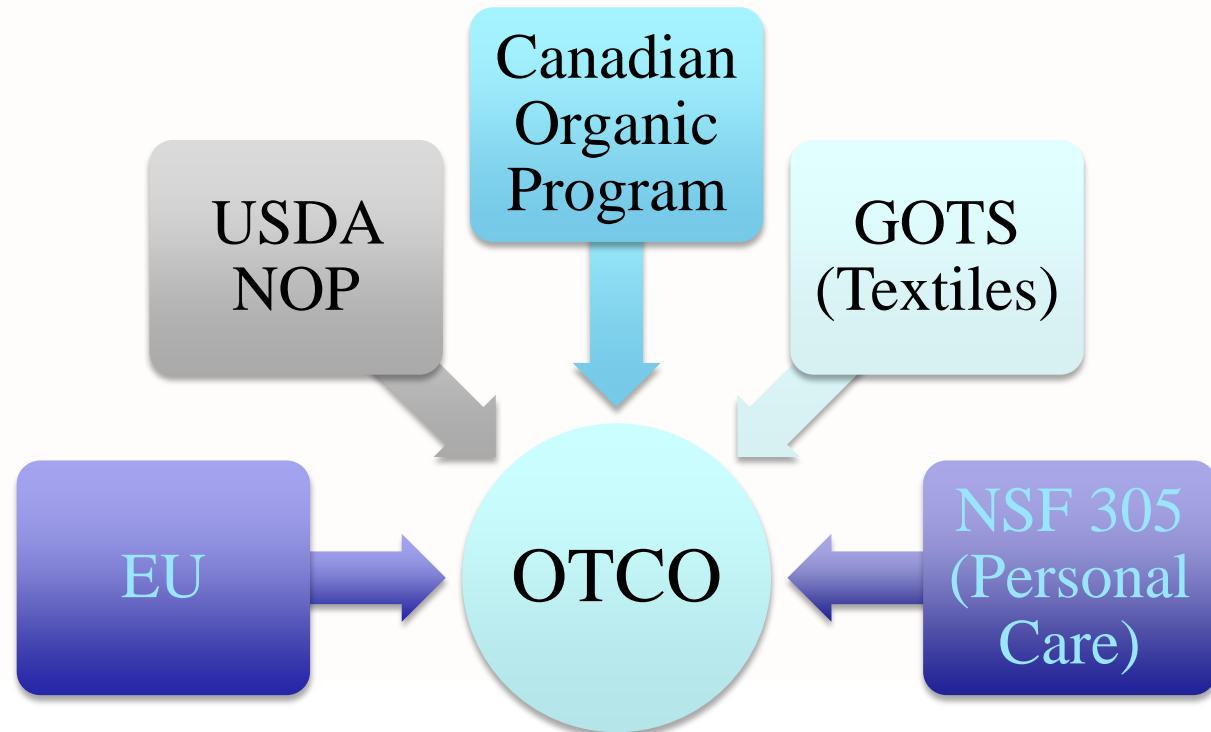


Oregon Tilth Certified Organic (OTCO) is an internationally recognized symbol of organic integrity. OTCO provides a system that combines strict production standards, on-site inspections, and legally binding contracts to protect the producers and buyers of organic products.



Oregon Tilth Certified Organic (OTCO)

- Among top 5 of US certifiers by size
- Leader in quality and valued accreditations
- Various organic standards:
 - different product types
 - global market access
- Strategic partnerships to add value and “bundle” certification services (i.e. Fair Trade, Salmon Safe)

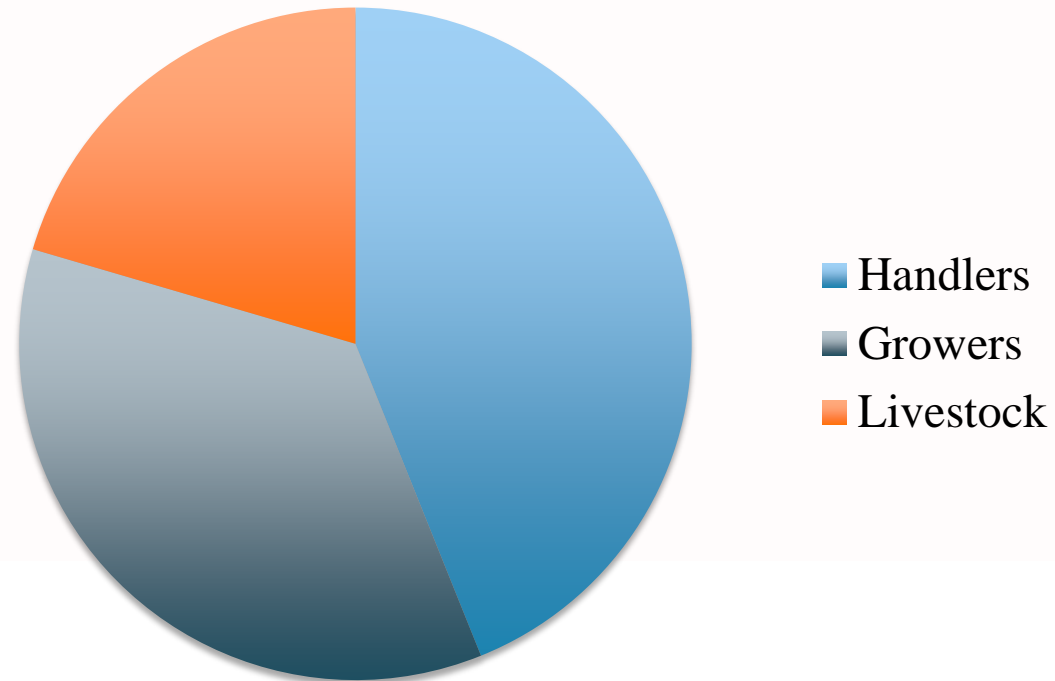




Oregon Tilth Certified Organic (OTCO)

- Certify across the food supply chain
- Ensuring organic integrity from farm to fork

Certified Clients by Scope



Oregon Tilth Certified Organic (OTCO)



Certification of over 1400 operations over North America
– including Canada, US, Mexico and Latin America



Third Party Certification

Who are the Three Parties?

The Seller

The Certification Agency


The Buyer or Consumer

- Voluntary
- Fee-based
- Fixed standards
- Verifies and Substantiates Claims



Certification Process

The Organic Certification Process

- 
1. Certification Application (Organic System Plan)
 2. Initial Review of Application
 3. On-Site Inspection
 4. Review and Decision
 5. Resolution
 6. Certification



Certification Process

What Components are in the Plan?

- Description of practices performed
- List of products used as inputs
- Description of the monitoring practices to verify plan is implemented
- Description of the record keeping system implemented
- Description of practices established to prevent commingling and contamination.



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Certification Process

1. Desk audit initial review

- Determines completeness
- Ability to comply with regulations
- Identifies any immediate areas needing attention
- Identifies appropriate inspector for type of operation

2. Assignment to Inspector



Certification Process

The Organic Certification Process

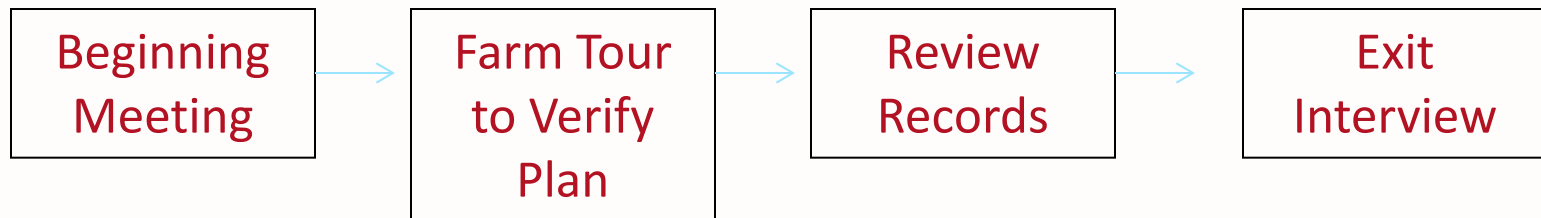
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On-Site Inspection

Components of the Inspection

Inspectors #1 role is to verify the organic system plan



Organic inspections are usually between 2-6 hours per operation depending on complexity of operation and preparation of operator



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Review & Decision

The Reviewers Role

Compare all information and make determination of compliance with the Rule

The Reviewer will:

- Read and evaluate inspection report
- Review OSP and compare with inspection report
- Issue decision regarding certification

Certification Decision options:

- Certify (with or without a few minor notices to operator)
- Issue Non-compliances
- Deny or Suspend

Decision is communicated with the Operator



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Resolution

Decision: **Certify**

- Certification Acknowledgement (Certificate) is issued.

Decision: **Approve Upon Resolution of Non-compliances**

- Non-compliances are areas that need to be resolved and corrective actions implemented prior to certification within specified time period.
- Once satisfactorily corrected, Certification Acknowledgement is issued.

Decision: **Deny or Proposed Suspension**

- Deny is for new applicant who has shown inability to comply. Proposed suspension is for operator that currently holds valid certificate (USDA is notified).
- Options to mediate or appeal certifier's decision to USDA.



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Certification

Certificate is issued

- Legal document issued by the certifier showing the operation is in compliance with the regulations.
- The certificate is a public document and required to specify the following
 - Name and Address of operation
 - Effective Date of Certification
 - Categories of the Operation (l.e. farm, livestock, handling operation)
 - Name, Address and telephone number of certifying agent

Some Certificates also include (but not required):

- products certified
- brand names of products

**The certificate is license to do business in organic, it is valid until suspended, surrendered or revoked.
(if misused it will be taken away)**



Certification Process

- Annual Process (§ 205.406)
 - Plan Updated & process repeated every year
- Unannounced Inspections
 - Verify continued compliance
 - Recommended during review process
 - Required by regulation and contractual agreement



Key Regulatory Requirements

Definition



Legal Definition:

In the U.S., all products that bear an organic label or advertise organic ingredients must meet or exceed the regulatory standards established in the National Organic Program (NOP), regardless of the country of origin.

Ecological Definition:

The proactive, ecological management of a farming system that maintains and enhances soil fertility, prevents soil erosion, promotes and enhances biological diversity, and minimizes risk to human and animal health and natural resources.



Key Regulatory Requirements

USDA NOP Definitions

- ❖ Positive definition: ‘A production system that is managed . . . by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity’ (7 CFR 205.2)

“...maintain or improve soil and water quality...”

- ❖ Negative definition: Food produced and handled without synthetic substances (with specific, limited, well-defined exceptions), and excludes genetically modified organisms, sewage sludge, and irradiation (7 CFR 205.105)



-- Organic Food Production Act, 1990

(Courtesy: B. Baker, OMRI)

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Key Regulatory Requirements

NOP Principles of Organic Production

- Manage the farm as a SYSTEM
- Enhance biodiversity, ecosystem function
- Use renewable resources
- Plants, animals, techniques are locally adapted
- Healthy soils and environment
- Traceability



Key Regulatory Requirements

Crop Production

- Organic Management Plan and supporting records
- Land requirements (3 year transition, buffer zones)
- Maintain and enhance soil quality
- Protect water quality and biodiversity
- Seeds and planting stock
- Emphasis on preventative pest management
- Contamination avoidance



Key Regulatory Requirements

Livestock Production

- Organic Management Plan & supporting records
- Origin of livestock
- Organic feed (no hormones, no slaughter by-products)
- Preventative health care practices (no antibiotics, vaccines okay)
- If treated with antibiotics, cannot call organic
- Cannot withhold medical treatment for sick animal to keep it “organic”
- No hormones for growth promotion, No routine synthetic parasiticides
- Living conditions (accommodate health & natural behavior)



Key Regulatory Requirements

Inputs



**** Natural materials allowed unless specifically prohibited (e.g. arsenic, strychnine)**

**** Synthetic materials prohibited unless allowed (e.g. horticultural oil, pheromones, copper sulfate, liquid fish fertilizer); EPA list 4 inerts**

Concept: ability of ecosystem, bodies to break down natural compounds; synthetic pesticides can persist in the environment and our bodies

National List, OMRI, WSDA are resources for allowed products



BREAK



Common Misconceptions



Inspectors

- Do not make certification decisions or consult
- Assess operation to the Organic System Plan
- Must have background experience in production
- Depend on visual observations and records audits
- Required to report food safety concerns



Maintain vs. Improve

§ 205.200 General.

The producer or handler of a production or handling operation intending to sell, label, or represent agricultural products as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must comply with the applicable provisions of this subpart. **Production practices implemented in accordance with this subpart must maintain or improve the natural resources of the operation, including soil and water quality.**

- Difficult to assess
- Based on Organic System Plan (OSP) provided
- Regional concerns are not taken into account



All or Nothing?

- Can certify portions of an operation
 - Split Production vs. Parallel
- More emphasis on records
- Land can be taken in and out of certification
- Livestock can not



Organic by Neglect

- In most cases does not comply
- Visually apparent
- Not supported by the National Organic Standards



Input Substitution

Callyn's Unofficial Definition- When operators seek to obtain allowed organic equivalent products to replace the conventional products typically used.

- Not allowed
- Must have preventative measures in place
- Applies to production, harvest and post harvest handling/ processing.



Common Mistakes



Preparation

- Important!
- Murphy's Law
- Schedule enough time
- Review your OSP thoroughly
- Substantiate your management assertions through records
- Keep records for 5 years



Day Of The Inspection

- Relax!
- Treat visit as a farm tour
- Ask Questions
- Keep a copy of the Exit Interview



Post Inspection

- Respond to any concerns or send corrective actions directly to Inspector/OTCO
- Choose Mediation or Appeal if necessary
- Respond in a timely manner!



Common Noncompliance(s)

- **RECORDS!**
- Seed search (commercial availability search)
- Materials
- Current certificates for inputs
- Labels



Additional Resources

- Oregon Tilth website www.tilth.org
- Organic Materials Review Institute www.omri.org
- National Organic Program www.ams.usda.gov/AMSV1.0/nop
 - Organic Standard
 - Producer Search
 - NOP Handbook
- eOrganic (Awesome!)
www.extension.org/pages/25242/webinars-by-eorganic#.UuvMn_a2Bk8
- ATTRA <https://attra.ncat.org/>
- Give us a call! Farmer Hotline – **(503) 581-8102**

