

Becoming Certified in the USDA National Organic Program

Do any of your large animal clients raise their animals organically? Do you get questions about how they can “be organic”? Do some of your small animal clients ask you about feeding their pets’ organic food? In part 1 of this 2-part series, we’ll discuss just what it takes for a farm to become certified under the United States Department of Agriculture National Organic Program. In the next issue of the Hoosier Veterinarian, part 2 of this series will cover organic practices – including medications that are allowed and those that are not – for different species of livestock.

The United States Department of Agriculture facilitates the National Organic Program. You may have seen seals like these at the grocery store.

Foods with this seal are certified organic through the USDA National Organic Program. The use of this seal indicates that at least 95% of the ingredients in the food are USDA certified organic.

Farms must be certified by the USDA in order to sell their products with the USDA Organic seal. Any processing facility that handles organic foods also must be certified under the USDA National Organic Program to use the USDA Organic seal on their finished products. Certification is a complicated process. Each farm or processing facility must create and put into practice an organic production plan (for farms) or organic handling plan (for processing facilities). This plan includes:

- A detailed description of any practices that will be performed on the farm (on a livestock farm that could include practices such as feeding, pasture rotation, health checks, and vaccinations).
- A complete list of each substance to be used, with the composition and source of the substance (this could include substances such as chemicals used in cleaning, vaccines, or any allowed medications that may be used on the farm).
- A description of the monitoring practices and procedures that will be performed to be sure the organic production plan is effectively implemented (such as milk testing, manure testing, soil testing, or water testing).
- A description of the record keeping system that will be used, with a plan to maintain these records for at least 5 years.
- A description of the management practices that will be used to prevent the contact of organic and nonorganic products (or the commingling of organic and nonorganic animals) and practices that will be used to prevent contact of organic products with substances that are prohibited in organic production.

Part of the certification process includes review of the organic production or handling plan, submission of fees, and an on-site inspection. The inspector must be granted full access to the farm or processing facility, even to areas that may not be managed organically. The inspection may include testing of the soil; water; waste; seeds or plant tissue; and any other plant, animal, or food samples. Once a farm or processing facility is certified under the National Organic Program, they must undergo an annual review, with a resubmission of their organic production plan (highlighting any changes that have been made or will be made in the next 12 months), a new on-site inspection, and annual fees. Certification can be

denied to a farm or processing facility based on noncompliance with any of the organic rules, but they do have an opportunity to correct their noncompliance issue and reapply for organic certification.

There are, of course, a few exemptions to the organic certification rules. Any farm that has gross agriculture income from organic sales of \$5000 or less per year does not need to be certified under the National Organic Program. However, they still must comply with all the rules of the program. Any agricultural product from these farms can be sold as organic, but cannot be used as organic ingredients in a processed product. For example, a dairy farm that was managed organically but not USDA certified could sell organic milk – as long as the gross sales were less than \$5000 a year – but the milk from this farm could not be used to make cheese that is labeled organic. A processing facility that only handles agricultural products with less than 70% organic ingredients does not need to be certified, but they do still need to take appropriate measures to prevent contact of the organic ingredients with substances that are prohibited in organic production. These types of farms and facilities do still need to keep records for at least 3 years documenting their procedures.

Not all foods that use the label “organic” are certified by the USDA. If the USDA Organic seal is on the food label, the farm and the processing facility has been inspected and certified by the USDA as described in this article. Some states also have an organic program. To be certified organic under the state program, all the USDA National Organic Program rules must still be followed, and the farm and processing facility must still be inspected by a state agency. These state agencies are, in turn, certified by the USDA. If the word “organic” is used on a food label, but not the USDA Organic seal, the inspecting agency must be listed on the label. In Indiana, ECOCERT ICO (<http://www.ecocertico.com/>) manages the applications, inspection, and certification for organic production in Indiana.

The National Organic Program rules are complex and detailed. The complete rules can be found in Title 7 of the Code of Federal Regulations, part 205. The entire CFR is available online at <http://www.ecfr.gov> (browse to Title 7, then look for part 205 to find the National Organic Program section).

In part 2 of this series in the next issue of the Hoosier Veterinarian, we will get into some of the details about how livestock must be raised under the National Organic Program.