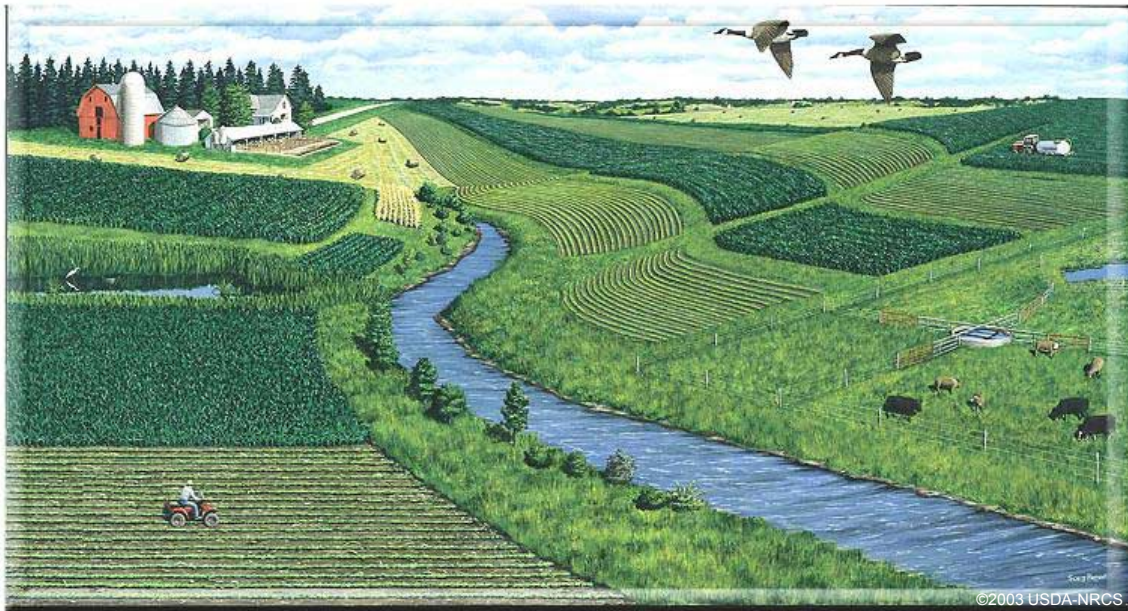


# National Organic Program Compliance Checklist for Producers June 2003



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## About This Document...

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This Checklist has been created to assist in assessing the compliance of your farm or ranch operation with National Organic Program Standards. The structure and the language used is an attempt to make your work, and that of the certifier and inspector, a bit easier. However, be aware that the Checklist is a guidance document only. It does not supplant the regulations of the National Organic Program, and may not reflect recent policy developments. National Organic Program Regulations and policy statements can be found on the National Organic Program Web site at <<http://www.ams.usda.gov/nop/NOP/NOPhome.html>>.

The Checklist is divided into eight sections. Sections 2 through 7 correspond to the six categories of information required in the Organic Production and Handling System Plan, as specified in the Organic Standard §205.201.

Each item in the Checklist is presented in the form of a question that can be answered by checking “YES,” “NO,” and “Not Applicable” boxes, located adjacent to the question. A check made in a “NO” box indicates that you may be out-of-compliance with the Federal Standard. In most instances, questions are accompanied by the section and paragraph number of the regulations to which they are pertinent.

Copies of the Checklist may be downloaded from NCAT’s ATTRA Web site at <<http://www.attra.ncat.org/attra-pub/PDF/compliance.pdf>>. Additional hardcopies can also be obtained by writing ATTRA at PO Box 3657, Fayetteville, AR 72702, or by calling 1-800-346-9140.

Additional ATTRA publications of interest:

For a general discussion and description of organic production, see *An Overview of Organic Crop Production*. For guidance on organic certification, see *Organic Farm Certification & The National Organic Program*. For more details about developing your Organic System Plan, see *Creating an Organic Production and Handling System Plan*. For details and resources for converting to sustainable organic production while adhering to NOP Regulations, see the *Organic and Sustainable Practices Workbook & Resource Guide for Cropping Systems* and the *Organic and Sustainable Practices Workbook & Resource Guide for Livestock Systems*.

# Table of Contents

About This Document.....	2
Section 1: General.....	4
Section 2: Practices & Procedures .....	5
SUBSECTION 2A: SOILS & CROPS .....	5
SUBSECTION 2B: WILD CROP HARVEST .....	6
SUBSECTION 2C: LIVESTOCK .....	6
SUBSECTION 2D: MANURE MANAGEMENT .....	9
SUBSECTION 2E: ON-FARM PROCESSING .....	9
SUBSECTION 2F: FACILITY PEST MANAGEMENT.....	10
Section 3: Inputs .....	10
SUBSECTION 3A: SOIL FERTILITY & CROP NUTRITION .....	10
SUBSECTION 3B: SEEDS & PLANTING STOCK.....	12
SUBSECTION 3C: CROP WEED, PEST, AND DISEASE MANAGEMENT.....	12
SUBSECTION 3D: LIVESTOCK FEED.....	13
SUBSECTION 3E: LIVESTOCK HEALTH & PEST MANAGEMENT.....	14
SUBSECTION 3F: FACILITY PEST MANAGEMENT.....	14
Section 4: Monitoring Practices & Procedures .....	15
SUBSECTION 4A: SOILS & CROPS .....	15
SUBSECTION 4B: LIVESTOCK .....	16
SUBSECTION 4C: FACILITIES .....	16
Section 5: Recordkeeping .....	16
Section 6: Commingling and Contamination .....	17
Section 7: Additional Information Required .....	18

## Section I: General

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- 1.1 Have you submitted an application(s) for organic certification to a certifying agent(s)?<sup>1</sup>  Yes  No  
 Not Applicable
- 1.2 Is the certifier(s) accredited with the USDA's National Organic Program (NOP)?  Yes  No  
 Not Applicable  
*A current list of accredited certifying agents is published on the NOP Web site at: <<http://www.ams.usda.gov/nop/>>.*
- 1.3 Did your application(s) require you to complete an organic production and handling system plan (also known as the Organic System Plan (OSP)) [§205.201]?  Yes  No  
 Not Applicable  
*A complete organic system plan includes the following:*  
*(1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;*  
*(2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;*  
*(3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented;*  
*(4) A description of the recordkeeping system implemented;*  
*(5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances;*  
*(6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.*
- 1.4 Did you advise the certifier(s) of any previous applications for certification including the names of the certifiers, dates of application, and the outcomes of those applications [§205.401(c)]?  Yes  No  
 Not Applicable
- 1.5 Did you provide the certifier(s) with details of any prior noncompliance notices, denials of certification, and actions taken to correct noncompliances [§205.401(c)]?  Yes  No  
 Not Applicable
- 1.6 Have you advised the certifier(s) of any deviations from the Organic System Plan or other actions that may affect compliance with federal organic regulations [§205.400(f)(2)]?  Yes  No  
 Not Applicable
- 1.7 Are all your organic products available for inspection by the Administrator,<sup>2</sup> the applicable State organic program's governing State official, or the certifying agent [§205.670(a)]?  Yes  No  
 Not Applicable

<sup>1</sup> Any operation or specified portion of an operation that produces crops or livestock that are intended to be sold, labeled, or represented as organic must be certified [§205.100(a)]. Operations that sell less than \$5000 of organic products are exempt from certification [§205.101(a)(1)].

<sup>2</sup> The administrator for the USDA's Agricultural Marketing Service (AMS) or an authority that has been designated to act in his/her stead [§205.2].

## Section 2: Practices & Procedures

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*A description of practices and procedures to be performed and maintained, and the frequency with which they will be performed is required as part of your Organic System Plan [§205.201(a)(1)].*

### SUBSECTION 2A: SOILS & CROPS

- 2.a.1. Are you using tillage and tillage practices in ways that maintain or improve the physical, chemical, and biological condition of the soil [§205.203(a)]?  Yes  No  
 Not Applicable
- 2.a.2. Are you using tillage and tillage practices in ways that minimize soil erosion [§205.203(a)]?  Yes  No  
 Not Applicable
- 2.a.3. If you are burning crop residues, is it clearly being done to suppress the spread of disease or to stimulate seed germination [§205.203(e)(3)]?  Yes  No  
 Not Applicable  
*It is prohibited to burn crop residues produced on the farm as a means of disposal [§205.203(e)(3)].*
- 2.a.4. Have you implemented a planned crop rotation<sup>3</sup> that will maintain or improve the organic matter content of your soil [§205.205(a)]?  Yes  No  
 Not Applicable
- 2.a.5. Have you implemented a planned crop rotation that aids in the management of crop pests and diseases [§205.205(b)]?  Yes  No  
 Not Applicable
- 2.a.6. Have you implemented a planned crop rotation that will aid in nutrient management [§205.205(c)]?  Yes  No  
 Not Applicable
- 2.a.7. Have you implemented a planned crop rotation that will reduce soil erosion losses [§205.205(d)]?  Yes  No  
 Not Applicable
- 2.a.8. Are you using sanitation measures to remove plant disease vectors, weed seeds, and the habitats that harbor crop pests [§205.206(a)(2)]?  Yes  No  
 Not Applicable
- 2.a.9. Are you using cultural practices that enhance crop health, including the selection of adapted plant species and varieties with resistance to prevalent pests, weeds, and diseases [§205.206(a)(3)]?  Yes  No  
 Not Applicable
- 2.a.10. Are you using only allowed methods to control crop pests [§205.206(b)]?  Yes  No  
 Not Applicable  
*Allowed mechanical and physical methods include but are not limited to:*  
*-the use of predators and parasites of a pest species [§205.206(b)(1)]*  
*-the development of habitat for natural enemies of pests [§205.206(b)(2)]*  
*-nonsynthetic<sup>4</sup> lures, traps, and repellents [§205.206(b)(3)]*

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<sup>3</sup> Crop rotation is defined 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. Perennial cropping systems employ means such as alley cropping, intercropping, and hedgerows to introduce biological diversity in lieu of crop rotation [§205.2].

<sup>4</sup> Nonsynthetic or "natural" substances are derived from mineral, plant, or animal matter and do not undergo synthetic processing [§205.2].

- 2.a.11. Are you using only allowed methods to control weeds [§205.206(c)]?  Yes  No  
*Allowed weed control methods include but are not limited to:*  
 -mulching [§205.206(c)(1) & [§205.206(c)(6)]  
 -mowing [§205.206(c)(2)]  
 -livestock grazing [§205.206(c)(3)]  
 -hand weeding and mechanical cultivation [§205.206(c)(4)]  
 -flame, heat, or electrical means [§205.206(c)(5)]  Not Applicable

- 2.a.12. Are you using only allowed means to control crop diseases [§205.206(d)]?  Yes  No  
*Allowed crop disease control methods include but are not limited to:*  
 -management practices that suppress the spread of disease organisms [§205.206(d)(1)]  Not Applicable

## SUBSECTION 2B: WILD CROP HARVEST

- 2.b.1. If you are harvesting a wild crop<sup>5</sup> that is sold, labeled, or represented as organic, is it harvested from a designated area that has had no prohibited substances applied to it for a period of 36 months immediately preceding the harvest [§205.207(a)]?  Yes  No  
 Not Applicable
- 2.b.2. If you are harvesting a wild crop that is sold, labeled, or represented as organic, is it harvested in a manner that is not destructive to the environment and will sustain the growth and production of the wild crop [§205.207(b)]?  Yes  No  
 Not Applicable

## SUBSECTION 2C: LIVESTOCK

- 2.c.1. If you are raising organic livestock (other than poultry) for slaughter or for production of other non-dairy livestock products, have the animals been under continuous organic management from the last third of gestation [§205.236(a)]?  Yes  No  
 Not Applicable  
*Nonorganic breeder stock can be brought onto the farm at any time to produce organic offspring. However, offspring intended for sale as organic must be under continuous organic management from the last third of gestation [§205.236(a)(3)]. Unless the breeding stock have, themselves, been under continuous organic management since the last third of gestation, they may not be sold or used as organic slaughter stock or for the production of non-dairy organic products [§205.236(b)(2)].*
- 2.c.2. If you are raising organic poultry, have the birds been under continuous organic management beginning no later than the second day of life [§205.236(a)(1)]?  Yes  No  
 Not Applicable

<sup>5</sup> A wild crop is any plant or portion of a plant that is collected or harvested from a site that is not maintained under cultivation or other agricultural management.

- 2.c.3. If you are producing organic milk or milk products, is the milk coming from animals that have been under continuous organic management for no less than 12 months [§205.236(a)(2)]?  Yes  No  
 Not Applicable  
*Note that unless milking animals have been under continuous organic management since the last third of gestation, they may not be sold as organic slaughter stock or for the production of non-dairy (e.g. wool, mohair, etc.) organic products [§205.236(b)(2)].*
- 2.c.4. If you chose to convert your entire dairy herd to organic production at one time, have you provided a minimum of 80% organic feed for the first 9 months of the 12-month conversion period [§205.236(a)(2)(i)]?  Yes  No  
 Not Applicable  
*Note that if you have chosen to convert your entire dairy herd using the 80% organic feed option allowed under §205.236(a)(2)(i), all replacement dairy stock must be under organic management from the last third of gestation [§205.236(a)(2)(iii)].*
- 2.c.5. If you chose to convert your entire dairy herd to organic production at one time, have you provided a minimum 100% organic feed for the last 3 months of the 12-month conversion period and continued to provide 100% organic feed thereafter [§205.236(a)(2)(ii)]?  Yes  No  
 Not Applicable
- 2.c.6. Have you chosen your livestock species and types for suitability to site-specific conditions and for their natural resistance to prevalent diseases and parasites [§205.238(a)(1)]?  Yes  No  
 Not Applicable
- 2.c.7. Do you provide a feed ration sufficient to meet species-specific nutritional requirements for vitamins, minerals, protein and/or amino acids, fatty acids, energy sources, and fiber [§205.238(a)(2)]?  Yes  No  
 Not Applicable
- 2.c.8. Do you provide appropriate housing, pasture conditions, and sanitation practices to minimize the occurrence and spread of diseases and parasites [§205.238(a)(3)]?  Yes  No  
 Not Applicable  
*The Organic System Plan must reflect a proactive approach to health management drawing upon allowable practices and materials [Final Rule, Preamble].*
- 2.c.9. Do you provide species-specific conditions that allow for exercise, freedom of movement, and reduction of stress [§205.238(a)(4)]?  Yes  No  
 Not Applicable
- 2.c.10. Are you limiting physical alterations of livestock to those that promote the animal's welfare, and perform them in ways that minimize pain and stress [§205.238(a)(5)]?  Yes  No  
 Not Applicable
- 2.c.11. Do you administer appropriate vaccinations or other veterinary biologics as a means of disease prevention [§205.238(a)(6)]?  Yes  No  
 Not Applicable  
*The Organic System Plan must reflect a proactive approach to health management, drawing upon allowable practices and materials [Final Rule, Preamble].*

- 2.c.12. When allowed livestock medications are administered, are they being used in a manner that complies with the Federal Food, Drug, and Cosmetic Act [§205.238(c)(6)]?  Yes  No  
 Not Applicable
- 2.c.13. When livestock become sick, do you take actions and apply the necessary medications to restore health regardless of the consequences to the animal's organic status [§205.238(c)(7)]?  Yes  No  
 Not Applicable  
*You may NOT withhold medical treatment from a sick animal in an effort to preserve its organic status. All appropriate medications must be used to restore an animal to health when methods acceptable to organic production fail. Livestock treated with a prohibited substance must be clearly identified and shall not be sold, labeled, or represented as organically produced [§205.238(c)(7)]. Note that there is no acceptable level of chronic illness within an organic production system. Furthermore, routinely diverting sick animals to early slaughter is not an accepted strategy for health management in an organic livestock operation [Final Rule, Preamble].*
- 2.c.14. Are you using allowed medications solely for the purposes of restoring animal health [§205.238(c)(2)]?  Yes  No  
 Not Applicable  
*The producer of an organic livestock operation must not administer any animal drug, other than vaccinations, in the absence of illness [§205.238(c)(2)].*
- 2.c.15. Do your livestock facilities provide access to the outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight [§205.239(a)(1)]?  Yes  No  
 Not Applicable  
*While providing access to these conditions is a requirement for certified organic production, accommodations may be made for the needs of species, the stage of production, the climate, and the environment [§205.239(a)(1)].*
- 2.c.16. Are you providing pasture for your ruminant livestock [§205.239(a)(2)]?  Yes  No  
 Not Applicable  
*Pasture is defined as land used for livestock grazing that is managed to provide feed value and maintain or improve soil, water, and vegetative resources [§205.2].*
- 2.c.17. Are you providing livestock with clean and appropriate bedding materials [§205.239(a)(3)]?  Yes  No  
 Not Applicable  
*If the bedding is typically consumed by the livestock, it must meet all the production and handling requirements that apply to organic feed [§205.239(a)(3)].*
- 2.c.18. Are you providing shelter facilities that allow the livestock space to exercise and the opportunity to exhibit natural behaviors and maintenance [§205.239(a)(4)(i)]?  Yes  No  
 Not Applicable
- 2.c.19. Are you providing well-ventilated shelter facilities in which there is adequate air circulation and protection from temperature extremes [§205.239(a)(4)(ii)]?  Yes  No  
 Not Applicable



- 2.c.20. Are you providing safe and well-maintained shelter facilities that reduce the potential for livestock injury [§205.239(a)(4)(iii)]?  Yes  No  
 Not Applicable
- 2.c.21. If you find it necessary to confine livestock, is it being done only on a temporary basis?  Yes  No  
 Not Applicable  
*Full confinement of livestock is prohibited and temporary confinement is allowed only for the following reasons:*
- a) *Protection from inclement weather* [§205.239(b)(1)]
  - b) *Accommodation of the needs of a specific stage of production* [§205.239(b)(2)]
  - c) *Conditions under which the health, safety, or well being of the animal could be jeopardized* [§205.239(b)(3)]
  - d) *Risks to soil or water quality* [§205.239(b)(4)]

## SUBSECTION 2D: MANURE MANAGEMENT

- 2.d.1. Are you managing manure in a manner that does not pollute or contaminate soil, water, or crops [§205.239(c)]?  Yes  No  
 Not Applicable
- 2.d.2. Are you managing manure in a manner that optimizes the recycling of nutrients [§205.239(c)]?  Yes  No  
 Not Applicable

## SUBSECTION 2E: ON-FARM PROCESSING

- 2.e.1. If you are doing on-farm processing of products for sale as organic, are you using only allowed processes?  Yes  No  
 Not Applicable  
*Processes allowed include mechanical or biological methods such as cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, distilling, extracting, slaughtering, cutting, fermenting, eviscerating, preserving, dehydrating, freezing, chilling, and the packaging, canning, jarring, or otherwise enclosing of a product in a container* [§205.2 & §205.270(a)].
- 2.e.2. If you are doing on-farm processing of products for sale as organic and must use nonorganic agricultural ingredients, are those items listed on the National List of nonorganically produced agricultural products allowed as ingredients...<sup>6</sup> [§205.270(b)]?  Yes  No  
 Not Applicable
- 2.e.3. If you are doing on-farm processing of products for sale as organic and must use nonagricultural ingredients, are those items listed on the National List of nonagricultural substances allowed as ingredients...<sup>7</sup> [§205.270(b)]?  Yes  No  
 Not Applicable
- 2.e.4. Are you careful NOT to use ionizing radiation in the production or on-farm processing of any product you market as organic [§205.105(f)]?  Yes  No  
 Not Applicable

<sup>6</sup> §205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”

<sup>7</sup> §205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”

## SUBSECTION 2F: FACILITY PEST MANAGEMENT

2.f.1. Are you using management practices to control pests in and around buildings and other facilities?

- Yes  No  
 Not Applicable

*Allowed management practices include:*

- 1) *Removal of pest habitat, food sources, and breeding areas [§205.271(a)(1)]*
- 2) *Preventing pest access to buildings and facilities [§205.271(a)(2)]*
- 3) *Manipulating environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction [§205.271(a)(3)]*

## Section 3: Inputs

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*A list of each substance to be used as a production or handling input – including its composition, source, location(s) where it will be used – and documentation of commercial availability must be provided as part of your Organic System Plan [§205.201(a)(2)]. Substances that may be used in organic production include nonsynthetic (natural) materials, unless they are specifically prohibited and listed under §205.602<sup>8</sup> (crops) or §205.604 (livestock). Allowed substances also include certain synthetic materials as specifically listed in §205.601 (crops) or §205.603 (livestock). While this Checklist addresses many individual inputs, a comprehensive listing of allowed and prohibited materials is not provided here. As a producer, you should read the appropriate sections of the National List indicated and confer with your certifier when in doubt. Note that many products and materials represented as “natural” or “organically acceptable” might not be allowed under federal organic standards. Always check with your certifier before using any new or questionable material.*

## SUBSECTION 3A: SOIL FERTILITY & CROP NUTRITION

3.a.1. By time of harvest, will your organic fields and crops be free of prohibited materials applications for at least 36 months [§205.202(b)]?

- Yes  No  
 Not Applicable

3.a.2. Have you taken care to avoid using prohibited fertilizers and soil amendments in organic production [§205.105]?

- Yes  No  
 Not Applicable

*Prohibited fertility inputs include: sewage sludge [§205.105(g)],<sup>9</sup> ash from burned manure [§205.602(a)], synthetic fertilizers NOT included on the National List of Synthetic Substances Allowed For Use in Organic Crop Production, and otherwise allowed fertilizers that contain these or other prohibited substances.*

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<sup>8</sup> §205.601 through §205.604 comprise the crop and livestock sections of what is called the “National List,” which deals with substances allowed and not allowed in organic production.

<sup>9</sup> Sewage sludge (also called biosolids) is the solid, semi-solid, or liquid residue generated during the treatment of domestic sewage. It also includes domestic septage and the scum or solids removed in any stage of wastewater treatment [§205.2].

- 3.a.3. When applying fertilizers and amendments, are you using only allowed inputs?  Yes  No  
 Not Applicable  
*Allowed inputs generally include: plant and animal materials [§205.203(b)],<sup>10</sup> items included on the National List of Synthetic Substances Allowed For Use in Organic Crop Production [§205.203(d)(1)], mined minerals of low solubility [§205.203(d)(2)], and ash from burned plant and animal materials [§205.203(d)(4)].<sup>11</sup>*
- 3.a.4. If you apply raw manure to a food crop<sup>12</sup> in which the edible portion makes contact with the soil, do you wait at least 120 days after incorporation before beginning harvest [§205.203(c)(1)(ii)]?  Yes  No  
 Not Applicable
- 3.a.5. If you apply raw manure to a food crop<sup>13</sup> in which the edible portion does not contact the soil, do you wait at least 90 days after incorporation before harvest [§205.203(c)(1)(iii)]?  Yes  No  
 Not Applicable
- 3.a.6. If you are applying composted manures<sup>14</sup> to food crops and the time intervals between application and harvest are shorter than the 90-and 120-day requirements specified for raw manures, is the initial carbon:nitrogen ratio of the feedstock mixture between 25:1 and 40:1 [§205.203(c)(2)(i)]?  Yes  No  
 Not Applicable
- 3.a.7. If an in-vessel or static aerated pile system is used to make the manure-based compost, is the temperature maintained between 131°F and 170°F for at least 3 days [§205.203(c)(2)(ii)]?  Yes  No  
 Not Applicable
- 3.a.8. If a windrow composting system is used to make the manure-based compost, is the temperature maintained between 131°F and 170°F for at least 15 days and are the materials turned a minimum of five times [§205.203(c)(2)(iii)]?  Yes  No  
 Not Applicable
- 3.a.9. If you are using potassium chloride (muriate of potash of KCl), or a formulated fertilizer that contains it, is it derived from a mined source [§205.602(g)]?  Yes  No  
 Not Applicable  
*Note that most commercial sources of potassium chloride are considered synthetic and NOT allowed in organic production.*
- 3.a.10. If you are using potassium chloride (muriate of potash of KCl) fertilizer, is it applied in a manner that minimizes chloride accumulation in the soil [§205.602(g)]?  Yes  No  
 Not Applicable
- 3.a.11. If you are applying sodium nitrate as a fertilizer, are you limiting its use to no more than 20% of the crop's total nitrogen requirement [§205.602(h)]?  Yes  No  
 Not Applicable
- 3.a.12. Are you applying all fertilizers and amendments at rates and in ways that do not cause ground or surface water pollution [§205.203(c) & §205.203(d)]?  Yes  No  
 Not Applicable

<sup>10</sup> Leather by-products, such as leather meal, are considered synthetic and prohibited in organic production [§205.105(a)].

<sup>11</sup> Ash from manure burning is specifically prohibited under §205.602(a).

<sup>12</sup> A crop intended as food for humans.

<sup>13</sup> A crop intended as food for humans.

<sup>14</sup> There are no specific regulations for composting when the feedstock is made up of only plant materials.

- 3.a.13. Are all the fertilizers and amendments you use free of contamination by heavy metals and residues of prohibited substances [§205.203(c) & §205.203(d)]?  Yes  No  Not Applicable

### SUBSECTION 3B: SEEDS & PLANTING STOCK

- 3.b.1. Are you using organically grown seed and annual planting stock for producing organic crops whenever equivalent varieties are commercially available [§205.204]?  Yes  No  Not Applicable
- 3.b.2. If you are producing organic sprouts, is all the seed you are using for sprout production organic [§205.204(a)(1)]?  Yes  No  Not Applicable  
*Organically grown seed MUST be used to produce organic sprouts.*
- 3.b.3. If you found it necessary to use seed or planting stock that was not organically grown, did you determine that these were NOT genetically engineered varieties [§205.204]?  Yes  No  Not Applicable
- 3.b.4. If you found it necessary to use seed or planting stock that was not organically grown, did you determine that these were NOT treated with a prohibited substance [§205.204]?  Yes  No  Not Applicable  
*Prohibited substances may only be used when they are a requirement of Federal or State phytosanitary regulations [§205.204(a)(5)].*
- 3.b.5. Are you using only organically grown seedlings and transplants to produce organic crops [§205.204]?<sup>15</sup>  Yes  No  Not Applicable
- 3.b.6. If you are selling planting stock that will be used to produce an organic perennial crop, has the stock been organically managed for at least 12 months before it is labeled or otherwise represented as organic [§205.204(a)(4)]?  Yes  No  Not Applicable

### SUBSECTION 3C: CROP WEED, PEST, AND DISEASE MANAGEMENT

- 3.c.1. Are you using only allowed materials to control crop pests [§205.206(b)]?  Yes  No  Not Applicable  
*Allowed inputs include but are not limited to:*  
*-introduced predators and parasites of a pest species [§205.206(b)(1)]*  
*-nonsynthetic lures, traps, and repellents [§205.206(b)(3)]*  
*-a substance included on the National List of synthetic substances allowed for use in organic crop production<sup>16</sup> [§205.206(e)]*

<sup>15</sup> Nonorganically produced annual seedlings may only be used to produce an organic crop when a temporary variance has been granted due to "(d)amage caused by drought, wind, flood, excessive moisture, hail, tornado, earthquake, fire, or other business interruption" [§205.290(a)(2)].

<sup>16</sup> Substances from the National List may only be used after rotation, cultural, biological, sanitation, mechanical, and other allowed methods and materials have failed to prevent or control crop pests [§205.206(e)].

- 3.c.2. Are you using only allowed materials to control weeds [§205.206(c)]?  Yes  No  
*Allowed weed control materials include but are not limited to:*  
*-fully biodegradable mulch materials [§205.206(c)(1)]*  
*-plastic or other synthetic mulches<sup>17</sup> [§205.206(c)(6)]*  
*-a substance included on the National List of synthetic substances allowed for use in organic crop production<sup>18</sup> [§205.206(e)]*  Not Applicable
- 3.c.3. Are you using only allowed materials to control crop diseases [§205.206(d)]?  Yes  No  
*Allowed crop disease control materials include but are not limited to:*  
*-application of nonsynthetic biological, botanical, or mineral inputs [§205.206(d)(2)]*  
*-a substance included on the National List of synthetic substances allowed for use in organic crop production<sup>19</sup> [§205.206(e)]*  Not Applicable

### SUBSECTION 3D: LIVESTOCK FEED

- 3.d.1. Are you providing your livestock with a ration composed solely of organic agricultural products and supplements,<sup>20</sup> allowed natural additives,<sup>21</sup> and feed additives included on the National List of synthetic substances allowed for use in livestock production feed [§205.237(a)]?  Yes  No  
 Not Applicable
- 3.d.2. Have you taken care to ensure that all organic rations are free of animal drugs and hormones [§205.237(b)(1)]?  Yes  No  
 Not Applicable
- 3.d.3. Have you taken care to ensure that all organic rations do not contain supplements or additives in excess of that needed for adequate nutrition and health maintenance [§205.237(b)(2)]?  Yes  No  
 Not Applicable
- 3.d.4. Have you taken care to ensure that all organic rations are free of plastic (roughage) pellets [§205.237(b)(3)]?  Yes  No  
 Not Applicable
- 3.d.5. Have you taken care to ensure that all organic rations are free of urea or manure [§205.237(b)(4)]?  Yes  No  
 Not Applicable
- 3.d.6. Have you taken care to ensure that all organic rations are free of mammalian or poultry slaughter by-products [§205.237(b)(5)]?  Yes  No  
 Not Applicable
- 3.d.7. Have you taken care to ensure that all feeds, feed additives, and feed supplements are being used in ways that are consistent with the Federal Food, Drug, and Cosmetic Act [§205.237(b)(6)]?  Yes  No  
 Not Applicable

<sup>17</sup> Plastic and other synthetic mulches must be removed from the field at the end of the growing or harvest season [§205.206(c)(6)].

<sup>18</sup> Substances from the National List may only be used after rotation, cultural, biological, sanitation, mechanical, and other allowed methods have failed to prevent or control weeds [§205.206(e)].

<sup>19</sup> Substances from the National List may only be used after the other methods have failed to prevent or control crop diseases [§205.206(e)].

<sup>20</sup> Feed supplements are a combination of nutrients added to feed to improve nutrient balance or performance. Supplements are either diluted and mixed with other feeds or provided free choice [§205.2].

<sup>21</sup> Feed additives are substances added to feeds in micro quantities to fulfill a specific nutritional need [§205.2].

### SUBSECTION 3E: LIVESTOCK HEALTH & PEST MANAGEMENT

- 3.e.1. When livestock medications are required,<sup>22</sup> are you making certain that these are either nonsynthetic materials or materials found on the National List of synthetic substances allowed in organic livestock production [§205.238(b)]?  Yes  No  
 Not Applicable
- 3.e.2. If you are using a parasiticide,<sup>23</sup> is it on the National List of synthetic substances allowed for organic livestock production [§205.238(b)]?  Yes  No  
 Not Applicable
- 3.e.3. If you are using an approved synthetic parasiticide, are you using it in accordance with restrictions imposed by organic regulation [§205.238(b)]?  Yes  No  
 Not Applicable  
*Allowed synthetic parasiticides may be used on breeder stock prior to the last third of gestation, but not during the breeding animal's lactation period for organic progeny [§205.238(b)(1)]. Synthetic parasiticides may also be used on dairy stock, when used a minimum of 90 days prior to the production of organic milk or milk products [§205.238(b)(2)]. Parasiticides MAY NOT be administered to organic slaughter stock [§205.238(c)(5)]. Routine use of parasiticides is PROHIBITED [§205.238(c)(4)].*
- 3.e.4. Have you taken care to avoid using prohibited medications and growth enhancers for organic livestock production [§205.238(c)(1)]?  Yes  No  
 Not Applicable  
*Prohibited materials include: antibiotics [§205.238(c)(1)], growth hormones [§205.238(c)(3)], items on the National List of NONsynthetic substances prohibited in organic livestock production [§205.238(c)(1)], synthetic medications NOT found on the National List of synthetic substances allowed in organic livestock production [§205.238(c)(1)].*
- 3.e.5. If you are providing your livestock with bedding material that is typically consumed by the animals, is the bedding organically grown [§205.239(a)(3)]?  Yes  No  
 Not Applicable

### SUBSECTION 3F: FACILITY PEST MANAGEMENT

- 3.f.1. When controlling pests in and around buildings and facilities, are you using only allowed materials and substances?  Yes  No  
 Not Applicable  
*Materials and substances allowed for facility pest management include:*
- 1) *Mechanical or physical controls such as traps, light, or sound [§205.271(b)(1)]*
  - 2) *Lures and repellents using allowed nonsynthetic and/or synthetic substances indicated on the National Lists [§205.271(b)(2)]*
  - 3) *Nonsynthetic pest control materials (unless prohibited on the National List) [§205.271(c)]<sup>24</sup>*
  - 4) *Synthetic pest control materials indicated as allowed on the National List [§205.271(c)]<sup>25</sup>*

<sup>22</sup> Medications should be used only after preventive practices and veterinary biologics have failed to prevent illness [§205.238(b)].

<sup>23</sup> As of October 2002, the only synthetic parasiticide on the National List was ivermectin [§205.603(a)(12)].

<sup>24</sup> Nonsynthetic pest control materials—such as botanicals—may be used only after management strategies, mechanical and physical techniques, and lures and repellents have failed to provide an adequate level of pest control [§205.271(c)].

<sup>25</sup> Allowed synthetic materials indicated on the National List may be used only after management strategies, mechanical and physical techniques, and lures and repellents have failed to provide an adequate level of pest control [§205.271(c)].

- 3.f.2. If you were obliged to use a synthetic pest control material for managing pests in or around buildings or facilities, was it because management strategies and allowed materials were inadequate [§205.271(d)]?<sup>26</sup>  Yes  No  
 Not Applicable
- 3.f.3. If you were obliged to use a synthetic pest control material for managing pests in or around buildings or facilities, were stringent measures to be taken to prevent contact of organically produced products or ingredients with the substance used [§205.271(d)]?  Yes  No  
 Not Applicable
- 3.f.4. If you were obliged to use a synthetic pest control material for managing pests in or around buildings or facilities, did you update the your operation's organic plan to reflect the use of such substances and methods of application, plus all measures taken to prevent contact with the organically produced products or ingredients [§205.271(e)]?  Yes  No  
 Not Applicable

## Section 4: Monitoring Practices & Procedures

*A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented is required in your Organic System Plan [§205.201(a)(3)].*

### SUBSECTION 4A: SOILS & CROPS

- 4.a.1. Are you monitoring production yield, quality, and other parameters as a means of verifying that your Organic System Plan is effectively implemented [§205.201(a)(3)]?  Yes  No  
 Not Applicable
- 4.a.2. Are you monitoring your fields to ensure that soil erosion is not occurring [§205.203(a) & §205.205(d)]?  Yes  No  
 Not Applicable
- 4.a.3. Are you monitoring the physical and biological condition of your soil to document changes in those characteristics [§205.203(a)]?  Yes  No  
 Not Applicable
- 4.a.4. Are you monitoring the humus or organic matter content of your soil [§205.203(c), §205.203(d), & §205.205(a)]?  Yes  No  
 Not Applicable
- 4.a.5. Are you monitoring nutrient levels in the soil to ensure that minerals are not being depleted [§205.203(b), §205.203(d), & §205.205(c)]?  Yes  No  
 Not Applicable

<sup>26</sup> You are allowed to use otherwise prohibited pest control materials for facility pest management if so-required by Federal, State, or local laws and regulations. However, measures must be taken to prevent the contamination of organic products and ingredients [§205.271(f)].

- 4.a.6. Are you monitoring nutrients in the soil to ensure that they do not reach toxic or polluting levels [§205.203(b), §205.203(d), & §205.205(c)]?  Yes  No  
 Not Applicable
- Areas of particular concern include:*
- phosphate and other nutrients – where manure is heavily and frequently applied
  - copper – where copper-based fungicides are frequently used
  - chloride – where natural sources of potassium chloride fertilizer are used
  - sodium – where Chilean nitrate is being used
  - specific micronutrients – where those are individually applied to the soil

- 4.a.7. If you make manure-based compost for use on your crops, are you monitoring temperature for each batch [§205.203(c)(2)(ii) & §205.203(c)(2)(iii)]?  Yes  No  
 Not Applicable

- 4.a.8. Are you monitoring key crop pests and diseases as a guide to pest management decisions?
- Biological and botanical pest control substances, and pest control agents included on the National List may be used only when cultural and natural biological controls are insufficient to keep a pest problem in check [205.206(e)]. Some form of monitoring must be used to trigger and justify the use of these materials. The conditions for using such materials must be documented in the Organic System Plan [§205.206(e)].*

## SUBSECTION 4B: LIVESTOCK

- 4.b.1. Are you monitoring livestock health as a guide to the use of allowed synthetic medications and allowed parasiticides [§205.238(b)]?  Yes  No  
 Not Applicable

## SUBSECTION 4C: FACILITIES

- 4.c.1. Are you monitoring pests in storage and other facilities as a guide to management decisions?  Yes  No  
 Not Applicable
- Biological and botanical pest control substances, and pest control agents included on the National List may be used only when environmental management, sanitation, barriers, and mechanical controls are insufficient to keep a pest problem in check [§205.271(c)]. Some form of monitoring must be used to trigger and justify the use of these materials. The conditions for using such materials must be documented in the Organic System Plan [§205.271(e)].*

## Section 5: Recordkeeping

*A description of your recordkeeping system must be provided in your Organic System Plan [§205.201(a)(4)].*

- 5.1. Are you maintaining a complete set of operation records covering the production, harvesting, and handling of all agricultural products that you intend to be sold, labeled, or represented as organic [§205.103(a)]?  Yes  No  
 Not Applicable



- 5.2. Is your recordkeeping system appropriate and well-adapted to the needs of your organic operation [§205.103(b)(1)]?  Yes  No  
 Not Applicable
- 5.3. Does your recordkeeping system fully disclose all activities and transactions in sufficient detail so as to be readily understood and audited [§205.103(b)(2)]?  Yes  No  
 Not Applicable
- 5.4. Have you retained or are you preparing to retain all records applicable to your organic operation for at least 5 years [§205.400(d) & §205.103(b)(3)]?  Yes  No  
 Not Applicable
- 5.5. Is the recordkeeping system sufficient to demonstrate compliance with organic regulations and the Organic Foods Production Act [§205.103(b)(4)]?  Yes  No  
 Not Applicable
- 5.6. Are your records available for inspection and copying during normal business hours by authorized representatives of the Secretary,<sup>27</sup> the State organic program, and/or the certifying agent [§205.103(c)]?  Yes  No  
 Not Applicable

## Section 6: Commingling and Contamination

*A description of your management practices and the physical barriers you've established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production operations and products with prohibited substances must be provided in your Organic System Plan [§205.201(a)(5)].*

- 6.1. Do your fields have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management [205.202(c)]?  Yes  No  
 Not Applicable
- 6.2. Have you notified your certifier(s) of any drift or misapplications of prohibited substances to any field, production unit, site, facility, livestock, or product that is part of the organic operation? [§205.400(f)(1)]  Yes  No  
 Not Applicable
- 6.3. Are you taking adequate measures to prevent the accidental commingling of organic and conventional crops, livestock, and products on your operation [§205.272(a)]?<sup>28</sup>  Yes  No  
 Not Applicable
- 6.4. During handling and storage, are you taking adequate measures to prevent contact of organic crops, livestock, and products with prohibited substances [§205.272(a)]?  Yes  No  
 Not Applicable
- 6.5. Are you applying all manures, fertilizers and amendments at times and in ways that do not cause contamination of crops [§205.203(c) & §205.203(d)]?  Yes  No  
 Not Applicable

<sup>27</sup> The Secretary of Agriculture or his/her delegate [§205.5].

<sup>28</sup> This question is most applicable to producers with split-operations and those that handle nonorganic as well as organic products and ingredients.

- 6.6. Are all your packaging materials, bins, and storage containers free of synthetic fungicides, preservatives, and/or fumigants [§205.272(b)(1)]?  Yes  No  
 Not Applicable
- 6.7. If you are re-using any bags or containers, are you taking measures to ensure that there is no risk of commingling with nonorganic products or of contamination with a prohibited substance [§205.272(b)(2)]?  Yes  No  
 Not Applicable
- 6.8. If Federal or State emergency programs required treating a crop or harvested crop with a prohibited substance, did you segregate and market it as non-organic [§205.672(a)]?<sup>29</sup>  Yes  No  
 Not Applicable
- 6.9. If Federal or State emergency programs required treating livestock with a prohibited substance, did you segregate and market any derived products as non-organic [§205.672(b)]?<sup>30</sup>  Yes  No  
 Not Applicable
- 6.10. When making repairs or when constructing new production buildings and facilities, are you using wood and other construction materials free of arsenic or other prohibited materials in circumstances where they can contaminate soil, water, crops, feed, or livestock [§205.206(f)]?  Yes  No  
 Not Applicable

## Section 7: Additional Information Required

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*Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations must be provided in your Organic System Plan [§205.201(a)(6)].*

- 7.1. If you are required to cooperate with additional testing or provide further information about any inputs to your organic operation by the Administrator,<sup>31</sup> your State Organic Program, or your certifier, have you done so [§205.670(b)]?<sup>32</sup>  Yes  No  
 Not Applicable
- 7.2. If you are required to cooperate with additional testing or provide further information about any of your organic products by the Administrator,<sup>33</sup> your State Organic Program, or your certifier, have you done so [§205.670(b)]?<sup>34</sup>  Yes  No  
 Not Applicable

<sup>29</sup> Application of a prohibited substance under these emergency circumstances will not affect the certification status of the operation [§205.672].

<sup>30</sup> Milk or milk products produced beginning 12 months after last treatment with a prohibited substance may be sold as organic [§205.672(b)(1)]. Offspring of livestock treated prior to the last third of gestation may be sold as organic [§205.672(b)(2)]. Application of a prohibited substance under these emergency circumstances will not affect the certification status of the operation [§205.672].

<sup>31</sup> The administrator for the USDA's Agricultural Marketing Service (AMS) or an authority that has been designated to act in his/her stead [§205.5].

<sup>32</sup> Additional testing may be required when there is reason to believe that the agricultural input contains an unacceptable level of prohibited substances or has been produced using excluded methods. Such tests must be conducted by the applicable State organic program's governing State official or the certifying agent at the official's or certifying agent's own expense.

<sup>33</sup> The administrator for the USDA's Agricultural Marketing Service (AMS) or an authority that has been designated to act in his/her stead [§205.5].

<sup>34</sup> Additional testing may be required when there is reason to believe that the product has come into contact with a prohibited substance or has been produced using excluded methods. Such tests must be conducted by the applicable State organic program's governing State official or

# Feedback

*Please detach, complete, and return to the address shown on the back.*

1) Did you find the Checklist helpful?  Yes  No

2) How might the Checklist be changed to be more useful to you?

3) Did you read any information in the Checklist that you believe is incorrect?

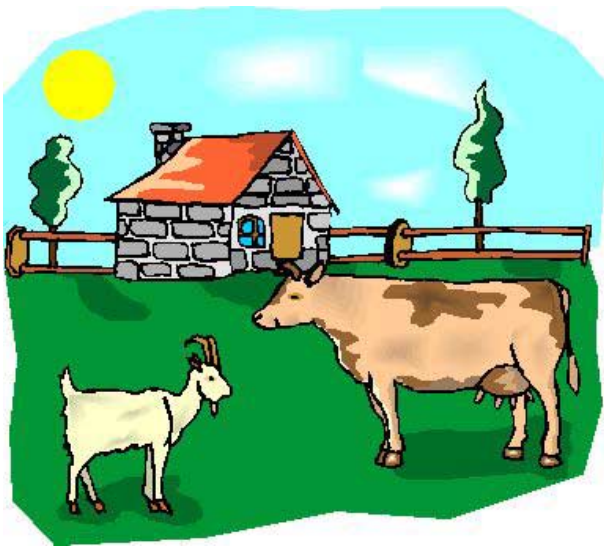
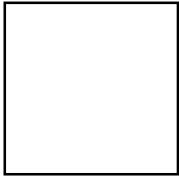
Yes  No

If "Yes," please indicate where you found the error.

4) I am a:      producer \_\_\_\_  
                  certifier \_\_\_\_  
                  inspector \_\_\_\_  
                  educator/information provider \_\_\_\_  
                  other \_\_\_\_ Please describe \_\_\_\_\_

Thank you for your valuable feedback.

George Kuepper  
National Center for Appropriate Technology  
(NCAT)  
P.O. Box 3657  
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*Thank You*  
FOR YOUR VALUABLE  
FEEDBACK!