National Organic Program Guidance

Natural Resources and Biodiversity Conservation

~ Washington State Dept. of Agriculture~
WSDA Organic Program

Our Mission:
Provide access to the organic market and ensure the integrity of the organic label through:

1. Certification of producers and handlers,
2. Registration of inputs for use in organic production, and
3. Technical assistance on the USDA organic regulations.
WSDA Organic Program

We are accredited by the USDA National Organic Program (NOP) to provide certification services.

We verify compliance to the USDA NOP Regulations.
Today’s Topics

• NOP Regulations include natural resource and biological diversity conservation requirements

• The certification process and natural resources and biological diversity evaluation

• Technical assistance and resources for organic producers
National Organic Regulations

7 CFR
Part 205
National Organic Regulations

- Definitions
- Applicability (who needs to be certified)
- Recordkeeping
- Allowed and prohibited substances
- General requirements
- Organic System Plan
- Land history
- Practice standards (crop, livestock, handling)
- Labels and marketing
- Certification
- Accreditation of certifiers
- Evaluation criteria for allowed and prohibited substances
- The National List

7 CFR Part 205
National Organic Regulations

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National Organic Regulations

Definition of Organic Production:

A production system that responds to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve bio-diversity.
National Organic Regulations

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- **General requirements**
  - Organic System Plan
  - Land history
  - Practice standards (crop, livestock, handling)
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7 CFR Part 205
National Organic Regulations

• 205.200 General.
Production practices must maintain or improve the natural resources of the operation, including soil and water quality.
National Organic Regulations

Definition of Natural Resources:

The physical, hydrological, and biological features of a production operation, including soil, water, wetlands, woodlands, and wildlife.
National Organic Regulations

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7 CFR Part 205
National Organic Standards

- Crop Production Practice Standards
  - Soil Management
  - Seeds and Planting Stock
  - Crop Rotation
- Weed, Pest, and Disease Management
National Organic Regulations

In 2016, the NOP issued
Guidance 5020
Natural Resources and Biodiversity Conservation

This guidance can be found in the National Organic Program Handbook

Five Steps to Certification

1. Operation adopts organic practices and applies for certification.
2. WSDA reviews your application and requests more information if needed.
3. Your operation is visited by a WSDA field inspector.
4. WSDA reviews the inspection report to determine compliance with organic regulations.
5. If compliant, your operation is issued an organic certificate.

Certification must be renewed annually.

Operations are inspected each year.
Operation adopts organic practices and applies for certification.

Fees
Application
Organic System Plan
1. Practices and procedures, including frequency performed
2. Practices to prevent commingling of organic and non-organic products
3. Practices to prevent contamination of organic products with prohibited substances
4. Monitoring practices, including frequency performed
5. A list and detailed information regarding each substance that may be used.
6. Additional information to evaluate compliance
The WSDA Crop Producer Organic System Plan will ask questions about how the operation maintains and monitors natural resources and biological diversity to prevent:

- Soil erosion
- Inefficient irrigation water use
- Excess nutrients in surface and ground waters
- Pesticides transported to surface and ground waters
- Excessive sediment in surface waters
- Habitat degradation
Sheet, Rill or Wind Erosion

5. Is permanent ground cover established on at least 90% at each site where organic crops will be harvested? □ Yes □ No

6. Is the slope of the land less than 10% at each site where organic crops will be harvested? □ Yes □ No

If you answered Yes to both of these questions skip to the next area of concern—Inefficient use of Irrigation Water

7. Do you have a third-party conservation plan addressing this area of concern? □ Yes □ No

7a. If yes, note the type of conservation plan below and attach a copy of your current plan as part of your organic system plan

7b. If no, identify which of the following practices you use on or adjacent to sites where organic crops will be harvested to maintain or improve soil stability:

- Alley cropping
- Annual crop rotation
- Conservation cover
- Contour buffer strips
- Contour farming
- Cover crop
- Critical area planting
- Cross wind ridges
- Cross wind trap strips
- Field border
- Herbaceous wind barriers
- Irrigation water management
- Lined waterway or outlet
- Mulching
- No till
- Pond
- Reduced till
- Seasonal till
- Ridge till
- Row arrangement
- Strip-cropping
- Vegetative barriers
- Windbreak/shelterbelt establishment

Other (please describe):
WSDA reviews your application and requests more information if needed.

What are the risks?
How does the applicant respond to the risks?
Inspectors verify the Organic System Plan is accurate and effectively implemented through:

- Observations
- Verification of records
- Interviews
Operation adopts organic practices and applies for certification. WSDA reviews your application and requests more information if needed. Your operation is visited by a WSDA field inspector. WSDA reviews the inspection report to determine compliance with organic regulations. If compliant, your operation is issued an organic certificate.
Inspectors cannot consult.
Inspectors **cannot** consult.

Inspectors **can** provide technical assistance.
Inspectors **cannot** consult.

Inspectors **can** provide technical assistance.

Inspectors **do not** make compliance decisions.
Inspectors **cannot** consult.

Inspectors **can** provide technical assistance.

Inspectors **do not** make compliance decisions.

Inspectors **do** identify issues of concern.
Issue of concern

Annual crop land is left bare over the winter without cover crop or crop residues.

Year 1
Corn – Clean tilled in fall and winter fallow

Year 2
Peas in spring
Issue of concern

Cover crop or crop residues are used over winter, but no other practices are used to promote biological diversity.

- **Year 1**
  - Corn – corn stalks left over winter

- **Year 2**
  - Peas in spring
Issue of concern

Soil is actively eroding (not due to extreme climatic event) and not being managed.
Issue of concern

Soil is summer fallowed (clean tilled throughout the crop year)
Issue of concern

Manure is applied to saturated or snow-covered soil.
Issue of concern

Liquid manure is applied to bare ground.
Issue of concern

Soil tests or other records show a nutrient level in excess, yet the nutrient was applied, or application rates show nutrient applied well in excess of recommended amount.

\[
\begin{align*}
\text{NO}_3 & \quad 50 \\
\text{ppm} & \\
\end{align*}
\]
Issue of concern

Crop production is adjacent to a water body with no intervening vegetation or practices to prevent drift or runoff from pest, disease, or weed control applications.
Issue of concern

Sedimentation is observed on a site adjacent to a waterway.
Issue of concern
Standing water or runoff observed.
Any issue identified by the inspector will be discussed with you during the inspection.

The inspector is required to issue a verbal Exit Interview, and the inspector will cite the regulation to support their findings.

The Exit Interview is a time for clarification, but once the inspection is done, the inspector’s role is complete and future communication should go through our main office.
4 WSDA reviews the inspection report to determine compliance with organic regulations.

The inspection report will contain:
1. Findings and citations in a written Exit Interview
2. The inspector’s:
   • Observations
   • Verifications
   • Interviews
### Biological Diversity

2. Are there any **In-Field Management** practices implemented to maintain biological diversity?  
   - a. If yes, explain observations made during inspection and/or records available verifying practices.

3. Are there any **Landscape Management** practices implemented to maintain biological diversity?  
   - a. If yes, explain observations made during inspection and/or records available verifying practices.

4. Are there any **Adjacent Waterway Management** practices implemented to maintain biological diversity?  
   - a. If yes, explain observations made during inspection and/or records available verifying practices.

5. Are there sites where improvement is needed to maintain biological diversity?  
   - a. If yes, describe observations made during inspection. Specify the site where improvement is needed.

Comments:
**Soil Erosion and Water Quality**

6. Are there soil erosion or water quality resource concerns at any site?  
   □ Yes □ No (Skip to 7)
   
   a. If yes, are there sites where improvement is needed to maintain soil stability or water quality?  
      □ Yes □ No (Skip to 7)

   b. If yes, indicate the site and type(s) of resource concern(s). Include observations and verifications of areas where improvement is needed. Indicate whether a previously identified concern is now being managed or still needs improvement.

<table>
<thead>
<tr>
<th>Site #</th>
<th>Soil erosion</th>
<th>Nutrient transport</th>
<th>Pesticide transport</th>
<th>Excessive sedimentation</th>
<th>List or briefly describe observations and verifications</th>
<th>Managed</th>
<th>Needs improvement</th>
</tr>
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<tbody>
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Comments: [Blank Space]
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<thead>
<tr>
<th><strong>Irrigation water use efficiency</strong></th>
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<tbody>
<tr>
<td>7. Does the operation irrigate sites where organic crops are harvested? [ ] Yes [ ] No (skip to Section F)</td>
</tr>
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<td>8. Are herbicides or fungicides applied to control growth in or along irrigation channels or canals that supply water to the operation? [ ] Yes [ ] No</td>
</tr>
<tr>
<td>a. If yes, describe how organic crop contamination prevention was verified:</td>
</tr>
<tr>
<td>9. Does the operation apply materials through a shared irrigation system to conventional and organic crops? [ ] Yes [ ] No</td>
</tr>
<tr>
<td>a. If yes, describe how organic crop contamination prevention was verified:</td>
</tr>
<tr>
<td>10. Indicate the practices used to maintain or improve irrigation use efficiency implemented by this operation.</td>
</tr>
<tr>
<td>[ ] Alley cropping [ ] Cover crop [ ] Irrigation reservoir [ ] Mulching [ ] Row arrangement</td>
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<tr>
<td>[ ] Contour farming [ ] Irrigation management [ ] Micro-irrigation [ ] No till / Ridge till [ ] Windbreaks</td>
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<tr>
<td>[ ] Other:</td>
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<td>11. Describe how water use monitoring practices were verified:</td>
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<td>Comments:</td>
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</table>
The inspection report and your organic system plan are reviewed together to determine compliance with the NOP Regulations.

The reviewer is an employee who has not worked as your inspector.

The review undergoes a quality assurance check before a final compliance decision is made.
If compliant, your operation is issued an organic certificate.

Certification decisions are issued 1-2 months after the date of your inspection.

After each inspection, you can expect one of the following types of letters:
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- Congratulations – no issues!
- Reminders and/or Action Needed
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After each inspection, you can expect one of the following types of letters:

- Congratulations – no issues!
- Reminders and/or Action Needed
- Notice of Noncompliance
5 If compliant, your operation is issued an organic certificate.

Certification decisions are issued 1-2 months after the date of your inspection.

After each inspection, you can expect one of the following types of letters:

• Congratulations – no issues!
• Reminders and/or Action Needed
• Notice of Noncompliance
• Notice of Proposed Suspension or Revocation
Operation adopts organic practices and applies for certification. WSDA reviews your application and requests more information if needed. Your operation is visited by a WSDA field inspector. WSDA reviews the inspection report to determine compliance with organic regulations.
Natural resource and biological diversity conservation is a constant state of improvement that occurs over time and in a dynamic world.
We work as a team to assist the agency and public.

Contact our main line with questions, concerns, or referrals:

(360) 902-1805
organic@agr.wa.gov
http://agr.wa.gov/FoodAnimal/Organic/