

Record Keeping for Certified Organic Producers – Part 1

by Jacomijn Schravessande-Gardei, Associate Director of Crops

Record keeping is not everyone's favorite task but it is an important way to prove the organic integrity of your farm/processing facility. In this three-part Record Keeping Series we will discuss the various records we expect our clients to keep.

For Part 1, we take a look at the three-year history of land records, seed/seedling/perennial/planting stock records and material application records needed in crop production.

The National Organic Program's (NOP) Organic rule 205.103 states that "a certified operation must maintain records for production, harvesting and handling of organic agricultural products..." These records must "be adapted to the particular business that the certified operation is conducting; fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited; be maintained for not less than 5 years; and be sufficient to demonstrate compliance" with the Organic Rule itself. These records must be "available for inspection and copying during normal business hours" by the organic inspector or other authorized representatives.

Records should show that any certified organic product or crop was organic from the beginning to the end. For crop production it all starts with the land!

Three Year History of the Land

If you are a new applicant or an existing certified farmer that wants to bring more land under organic production, you must have records that show the three-year history of the land. If you have managed the land for the

last three years you will have to have records that show the land has been under organic management for that same time period.

If you have not managed the land for the last three years we will need a landowner affidavit where the landowner/previous landowner/previous manager confirms that the land has been treated organically for the same time period.

Seed, Seedling, Perennial and Planting Stock Records.

A quick recap of the NOP rule regarding seed, seedling, perennial, and planting stock is that seeds and planting stock must be organic,

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unless not commercially available in the quantity or quality that you need. If you must use conventional seeds, they must be non-GMO and untreated. Seedlings **always** have to be

organic. Conventional perennial planting stock must be managed organically for at least 12 months prior to being sold, labeled, or represented as organic. To demonstrate compliance with these rules, the following should be kept:

For certified organic seeds, planting stock, seedlings and perennials used:

- Receipts/invoices of seeds, seedlings, and perennials actually purchased. Lots of farmers have a manila folder where they collect all their receipts. Make sure that these receipts are available at the inspection and that they are not at the accountant or someplace else. Seed packages can serve as a record of seed purchases if dates are printed on them, but keep in mind that producers must keep records for 5 years. If the same info is available on the invoice or packing slip, then there is no need to keep

the package. If you buy seedlings from other farmers, make sure that the receipt shows that you bought certified organic seedlings.

- If you save seeds, make sure that harvest records show production of organic seed.

For conventional seeds, planting stock and perennials used:

- Organic seed search records. If you end up using conventional seeds you have to show that you searched at least three likely organic seed suppliers for the certified organic seeds that you need. Excel spreadsheets, or paper records, for instance, that show which seed companies were searched for the conventional seeds you used are one way to record your seed search. Make sure to have printed correspondences from seed companies regarding your requests along with their inventory and availability. Additionally, use your MCS farm plan to show your seed search protocol. Showing your seed catalogs to your inspector can serve as evidence that you are shopping broadly for seed, but this does not actually provide evidence of actual purchases or problems encountered with organic seed availability.
- Verification from the supplier that non-organic seed is not genetically modified. This is only necessary for seeds that have commercially available GMO seeds (e.g. corn, potatoes, soybeans, sugar beets).
- For conventional perennials undergoing the one-year transition, planting records showing where and when those perennials were planted are important.

Material application records

Material application records need to show that you are complying with NOP 205.105 which lays out the rules with

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regards to the allowed and prohibited substances, methods and ingredients in organic production and NOP 205.203 which describes the standards regarding the soil fertility and crop nutrient management practice standards. The manure waiting period and the compost production process is part of this.

Material application records need to include all inputs used before, during and after planting and should record the date, what input is used, rate, location and the source. This includes records for soil amendments, including fertilizer, compost, weed, pest or disease control products, manure application records (this should include date of manure application and date of first harvest yield/ kind of crop from that field), and foliar sprays. Invoices or receipts for all materials purchased, including custom applicator invoices, need to be kept. Soil test or other records showing deficiencies should be kept if using synthetic micronutrients.

Stay tuned for the May 2019 *Sprout* where we will discuss production records and harvest, storage and sales records in the second installment of this Record Keeping Series



Record Keeping Resources

Sample forms that provide templates to help farmers organize the records that will be reviewed at inspection can be found from many sources.

MOFGA Certification Services has published some simple record keeping templates that can be found here:

<https://mofgacertification.files.wordpress.com/2012/01/recordkeepingexampleforms1.pdf>

More in- depth record keeping templates are published by ATTRA and can be downloaded here:

<https://attra.ncat.org/attra-pub/summaries/summary.php?pub=358>

With support from the USDA NOP, Oregon Tilth developed a series of farmer-to-farmer case studies on best practices in record keeping, which give a good insight in how other farmers are dealing with their record keeping and are a nice read. Scroll down the when you are on the page:

https://tilth.org/resource_format/lessons-learned/

If you are more of a visual learner and like webinars, CCOF did a recent webinar series on organic record keeping that can be seen here:

<https://www.ccof.org/blog/organic-recordkeeping-webinar-series-growers>

Both MOFGA's gricultural Services and the University of Maine Cooperative extension offer record keeping consults for farmers. If you are interested in help from MOFGA's Ag Services, please contact Dave Colson at dcolson@mofga.org or 568-4142. For information on the University of Maine's assistance please contact Calvert Schaefer at calvert.schaefer@maine.edu or 443-340-4324.

NOP Issues Extension of Allowance of Paper Pots in Organic Production

On Monday, November 5, MCS and all NOP-accredited certifiers were informed that the NOP has extended the use and allowance period for paper pots, originally scheduled for prohibition at the end of the growing season. MCS submitted a petition to the NOSB asking for this change. The following is a portion of the announcement regarding the change.

The NOP is extending the allowed use of paper pots until further notice. Any additional changes to the allowance for the use of paper pots will be communicated to certifiers to provide adequate time to make any adjustments. For fairness and consistency in certifications across operations, all certifiers may allow paper pots during this extension period.

Paper pots have been formally petitioned to the National Organic Standards Board (NOSB) via the National Organic Program as an allowed material in crop production. In addition to presenting a discussion document on the petitioned material, the NOSB passed a resolution at its Fall 2018 public meeting recommending that the NOP allow the continued use of paper pot usage while this review and potential NOP rule making proceed. Paper pots are similar to the current National List of Allowed and Prohibited Substances (National List) listing of newspaper or other recycled paper, which are in use in many soil-based systems. We agree that the NOSB's resolution allows the program to extend the allowance for paper pots, while maintaining fidelity to the existing USDA organic regulations.