

Record Keeping (Continued from Page 3)

inspection will be completed that much sooner.

Please keep in mind that you are also required to report annual gross organic sales on your organic paperwork each year and an inspector can ask to look at this.

If you buy in organic and conventional product(s) from other farms, you must keep records that show your inspector the amount of crop(s) bought-in, amount of bought-in crop(s) sold, and verification that bought-in products are either certified organic or not sold as organic.

If you are a parallel operation (meaning you produce both conventional and organic crops) records must be kept that document the protocols in place to avoid comingling and contamination. These records may include equipment cleaning logs for pesticide tanks, tractors or boxes. Records may also include post-harvest handling standard operating procedures and product labeling.

Records should be saved for five years. Experiment with different methods of keeping records, notebooks, technology or apps and find the record keeping method that works best for you!

There are a lot of records to keep in order to be in compliance with the organic rule. But many farmers say that keeping these records not only helps make their organic certification inspection go smoother, but also helps them in their decision-making on the farm and makes them better farmers!



Pesticide Residue Testing

by MCS Staff

The National Organic Rule states that all applicants or certified operations must have on-site inspections annually as part of the application or renewal process. In the Spring 2018 Sprout we explained how MCS is required to perform roughly 30 unannounced inspections each year to comply with the NOP guidance of conducting unannounced inspections for 5 percent of total certified operations. In addition to unannounced inspections, MCS is also required to conduct pesticide residue testing for 5 percent or more of MCS certified operations as required by NOP 205.670. We often collect these samples during your annual or unannounced inspection.

Residue testing of organic products helps deter fraud and prove to organic customers that organic standards are upheld through quantitative evidence. However, organic certification is a process based standard and therefore residue testing alone cannot be used to determine whether or not a given operation is using organic practices.

MCS conducts residue testing in two ways: risk-based and random

Risk-based residue testing serves as a means of investigating complaints and suspected cases of contamination, for example, when there is suspected pesticide drift onto an organic operation, or to verify the integrity of imported organic products. Random residue testing, on the other hand, is conducted by collecting samples across the spectrum of MCS clients. Samples are taken from all production categories - processors, crop farms, sea vegetables, maple, livestock and dairy. Every operator should expect that residue testing may occur at their operation. MCS is granted authority to collect samples for testing by the National Organic Program regulations section 205.670. If you refuse to allow an inspector to take a sample adverse actions can be taken.

Inspectors have been trained in the correct and proper method of sample collection. MCS has strict procedures that prevent contamination and that ensure an audit trail can trace each sample back to its origin. After the inspector collects a sample from a producer, it is sent to a USDA approved laboratory, which then performs an organic screen. An organic screen is a broad screen pesticide residue analysis that includes hundreds of pesticides that are common for use on conventional farms but not allowed on organic farms. We may also choose to test for GMO presence for at risk commodities. Your annual fees cover these tests, so you will not be charged extra for the laboratory analysis. (Worth mentioning? A single test can cost about \$300 alone in lab charges!)

When MCS receives the results of the samples from the lab we then notify the producer. As required by law, results will also be made available to the public upon request.

If a product is found to contain more than 5% of the tolerance level for a given pesticide set by the US Environmental Protection Agency (EPA) it cannot be sold as organic. Further investigation by MCS regarding the contamination may be conducted depending on the circumstances.

More information about pesticide sampling can be found here:

<https://www.ams.usda.gov/sites/default/files/media/2610.pdf>

<https://www.ams.usda.gov/sites/default/files/media/2613.pdf>

