

## Record Keeping for Certified Organic Crop Producers - Part 2

by Jacomijn Schravessande-Gardei, Associate Director of Crops

In the Fall 2018 issue of The Organic Sprout we discussed the three-year history of land records, planting stock and material/input application records. This second installment of our three-part series on record keeping will discuss production, storage and sales records.

Production records reflect your management techniques. Many inputs are only allowed if the requirements of 205.206(e) are met, which requires the use of preventative, mechanical, physical and other pest, weed and disease management practices. Production records include crop rotation records, field activity records, compost production records, equipment clean out records and the one year transition records for perennials.

- **Crop rotation records.** Crop rotation can be recorded on maps, on field histories and in Excel spreadsheets. It is important that the records clearly show the inspector that different crops are rotated to maintain soil fertility and crop nutrients. Cover crops should also be recorded.
- **Field activity records.** Protocols and records on cultivation practices, weeding and planting dates should be documented. Remember to use your field history sheets to their full advantage.
- **Compost production records** are required if feedstocks contain manure or animal parts and the finished product is applied during the growing season on crops intended for human consumption. Your records should show the sources and feedstocks of the compost, the temperature data and when you are turning the compost.

- **Equipment Cleaning.** If you use equipment that is used on conventionally managed land an equipment clean out log must be kept that shows when the equipment was cleaned prior to being used on certified land. Equipment needs to be cleaned any time it goes from a non-organic field or crop to an organic field. This includes tillage and cultivation equipment but is most important for sprayers and harvest equipment. The equipment cleaning log should list the method of cleaning as well as the individual who performed the cleaning.
- **Conventional Perennials.** If you grow perennials that were sourced conventionally you must have records that show you searched for an organic source and could not find one. You must also be able to show your inspector that the perennials being harvested have undergone the one-year transition period of organic management.

Harvest, storage and sales records show us the fruits of your labor! Harvest records are very important for the inspector as they document your yields and can be used for audit trails. An audit trail is an essential paper trail that allows products to be traced to the farm/field of origin. An inspector will examine your records to verify that this traceability link can be proven on paper. Audit trail requirements vary depending on the scale and complexity of the farm operation. Producers should work with their certification specialist on an audit trail system that verifies compliance with the regulations.

Examples of records needed to demonstrate farm traceability can be found below. Please note each farm is different and that the records below are general records; your farm trace

back might need additional records.

### For farms that have direct sales through CSA, farm stand, and/or farmers' markets:

- A daily receipts log of sales showing crops sold
- CSA share records
- Harvest records (if different from sales records). For crops grown and harvested from multiple fields at the same time of the year, records that differentiate between fields must be kept.

### For farms that wholesale to local co-ops, stores, restaurants:

- A log book and/or dated invoices to document product sales.
- Wholesale containers labeled with farm name and a lot number or date.
- Harvest records (if different from sales records). For crops grown and harvested from multiple fields at the same time of the year, records that differentiate between fields must be kept.

### For farms that wholesale to processors or distributors:

- Sales invoices with lot numbers.
- Wholesale containers labeled with farm name and a lot number or date.
- Inventory records for stored product.
- Harvest records. Harvest records must indicate the field of harvest.

Lot numbers should link to the field where the crop was grown and the date of harvest.

Please make sure to consider what unit of measurement you will use to quantify your harvest—bales, bushels, pounds, tons or bunches. The inspector will compare the sales records with the harvest records. If they are in the same unit, or you have weights prepared for non-weighted units, an audit trail can be done faster and your



## 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>

