

Material Inputs in Organic Production and Handling

by Julie Trudel, Materials Reviewer

The USDA National Organic Program Rule [§205.201\(a\)\(2\)](#), [Organic production and handling system plan](#), requires that a producer or handler include in their system plan, “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.” At MOFGA Certification Services (MCS), this is what is referred to as your materials list. The importance of this list is to verify that the inputs you intend to use in your operation are in compliance with [§205.105](#), [Allowed and prohibited substances, methods and ingredients in organic production and handling](#). At your annual inspection, or during an unannounced inspection, your inspector will observe inputs onsite and in your records, and compare them with those on your materials list.

In the event that a product on your list has a change in approval status, MCS will contact you to inform you of the update and of how to proceed. This is important because if a manufacturer changes a product formula or ingredient that changes its classification to prohibited for use in organic production then continued use at your operation could result in a non-compliance or possibly disqualify your operation from continued certification. Without an accurate, up-to-date materials list, MCS will not have the necessary information to notify you of important updates.

Considerations to keep in mind when selecting inputs

Always notify your certification specialist prior to using any input. Your materials list, once approved as part of your organic system plan, will serve as the foundational list for your operation. Any new product you would like to add should be approved and added to your materials list by your certification specialist prior to use. We encourage you to look for inputs found on the Organic Materials Review Institute ([OMRI](#)), Washington State Department of Agriculture ([WSDA](#)) and California Department of

Food and Agriculture ([CDEFA](#)) lists, but still require you to notify us before using any new inputs. Approval status of products sometimes change when re-reviews are conducted. Additionally, a product referral from a sales representative or another certified organic producer does not eliminate the requirement for you to notify your specialist and confirm approval before using the product.

When seeking approval for a material input, be prepared to provide the full product name as seen on the label. For example, while searching “Grandevo” on the OMRI list, I find Grandevo, Grandevo WDG Bioinsecticide, Grandevo CG Bioinsecticide, Grandevo WG Biological Insecticide-Miticide Dispersible Granular Biological Agent (WG) and Grandevo ST, all manufactured by Marone Bio Innovations. Be specific about which product you are requesting approval for, and consider submitting product labels, Environmental Protection Agency (EPA) numbers or other specifics that will give MCS the information we need to make a determination.

Scope and use – Are you choosing inputs for a crop, livestock or processing/handling operation? An input allowed for use in one scope does not necessarily mean it is approved for use in another scope. It is important to be specific about where and how you intend to use a material input. Is it being used as a fertilizer, insecticide, fungicide? Will it come in contact with food or a food contact surface? Will it be followed by a rinse? Will livestock have contact with the product or residue?

Most nonsynthetic, or natural, substances are allowed for use in organic crop production. Nonsynthetic substances that are prohibited for use in crop production are found at [§205.602](#) of the [National List of Allowed and Prohibited Substances](#). Synthetic substances that are allowed for use in crop production are listed under [§205.601](#). Determination of synthetic or nonsynthetic status is made during the material review process. In organic livestock production, [§205.603](#) lists synthetic substances allowed for use, and [§205.604](#)

lists nonsynthetic substances prohibited for use, currently just strychnine.

When referencing sections 205.601 and 205.603, it is important to note and follow any annotations or restrictions associated with a specific input. For instance, 205.601(k) allows the use of ethylene gas as a plant growth regulator – but only for regulation of pineapple flowering. In 205.603(a)(22), oxytocin is allowed for use in post-parturition therapeutic applications but would not be allowed for other uses. Therefore, when referencing §205.601 and §205.603, it's important to note restrictions for use.

Nonagricultural substances are not allowed for use in or on processed products, except as noted under [§205.605](#), which includes sections for nonsynthetics allowed and synthetics allowed.

Finally, in all scopes, excluded methods (with an exception for vaccines), ionizing radiation and sewage sludge are prohibited for use in organic production.

Recordkeeping – If you are already a certified producer, you might know where this is going. Many material inputs carry a restriction that preventative management practices have been implemented at the farm or processing facility, and have been unsuccessful in addressing a specific issue, before the input can be used. Records of these preventative practices must be kept for verification in order to justify use of the product. The use of some synthetic micronutrients, for example, carries a restriction that a deficiency must be documented, so soil or tissue analysis results confirming said deficiency must be available upon request from the certifier or at inspection. Specifically, the preventative management practice requirements are noted at [§205.206](#), [Crop pest, weed, and disease management practice standard](#), [§205.238](#), [Livestock health care practice standard](#), and [§205.271](#), [Facility pest management practice standard](#).

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Cattle Corner

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the lactation period for breeding stock. Allowed for fiber bearing animals when used a minimum of 36 days prior to harvesting of fleece or wool that is to be sold, labeled, or represented as organic.

(i) Fenbendazole (CAS #43210-67-9) - milk or milk products from a treated animal cannot be labeled as provided for in subpart D of this part for: 2 days following treatment of cattle; 36 days following treatment of goats, sheep, and other dairy species.

(ii) Moxidectin (CAS #113507-06-5) - milk or milk products from a treated animal cannot be labeled as provided for in subpart D of this part for: 2 days following treatment of cattle; 36 days following treatment of goats, sheep, and other dairy species.



The End of Organic Farming

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- reciprocity agreements can be amended.
6. Support local and regional organic producers — Buy from local and regional organic growers who follow all OFPA and regulatory requirements. Plant organic gardens and orchards.
 7. Support the Real Organic Project and Rodale's Regenerative Organic Certification, both of which highlight operations that fully comply with all requirements of OFPA and 7 CFR 205, including those which require soil building, crop rotation, protection of biodiversity and natural resource management.
 8. Amend the Law — As a Big Plan B, amend the OFPA to make it clear that hydroponics, genetic engineering and food irradiation are not allowed in organic. Period.

While the USDA would like us to believe that this is a "settled issue," it will not be settled until the USDA enforces the soil fertility provisions of 6513(b)(1) and

uses its accreditation program to stop certification of hydroponic operations as "organic."

Jim Riddle was founding chair of the International Organic Inspectors Association. He served on the National Organic Standards Board and on the boards of the International Organic Accreditation Service and the Organic Farmers Association. Jim currently serves as chair of Minnesota's Organic Advisory Task Force, which advises the MDA and UMN on organic policy and research priorities.



Jim Riddle making compost at Blue Fruit Farm.
(Photo credit: Jim Riddle)



Material Inputs (Cont'd)

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References:

- NOP §205.201 — www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205/subpart-C/section-205.201
NOP §205.105 — www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205/subpart-B/section-205.105
NOP §205.602 — www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205/subpart-G/subject-group-EC-FRoebc5d139b750cd/section-205.602
NOP §205.603 — www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205/subpart-G/subject-group-EC-FRoebc5d139b750cd/section-205.603
NOP §205.604 — www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205/subpart-G/subject-group-EC-FRoebc5d139b750cd/section-205.604
NOP §205.605 — www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205/subpart-G/subject-group-EC-FRoebc5d139b750cd/section-205.605
NOP §205.206 — www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205/subpart-C/section-205.206
NOP §205.238 — www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205/subpart-C/section-205.238
NOP §205.271 — www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205/subpart-C/section-205.271
National List of Allowed and Prohibited Substances — www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205/subpart-G/subject-group-ECFRoebc5d139b750cd
OMRI — www.omri.org
WSDA — cms.agr.wa.gov/WSDAKentico/Documents/FSCS/Organic/Pubs_organic/WSDA_Organic_Input_Material_List.pdf
CDFA — www.cdffa.ca.gov/is/fldr/pdfs/RegisteredOrganicInputMaterial2022.pdf

