

Record Keeping for Certified Organic Livestock Producers

By MCS Staff

Organic certification and record-keeping go hand in hand. The past two editions of the Record Keeping series focused on land records, inputs, crop production, storage and sales records for organic crop production. For the third installment of our Recordkeeping Series, we will focus on recordkeeping requirements for organic livestock producers.

The National Organic Program (NOP) defines livestock as cattle, sheep, goats, swine, poultry or equine animals. Certified organic livestock operations are required to maintain records adapted to their particular business concerning the origin of livestock, management practices, and production and sale of organic products (milk, eggs, meat, replacement stock, etc.). Together, these records should be able to demonstrate an operation's compliance with the organic standards.

As an accredited certifier, MCS relies on a producer's records to compare farm activities with the NOP Standards. The NOP requires that records pertaining to your organic operation must be made available for review at your annual inspection, at unannounced inspections, or for other compliance inquiries conducted by MCS. Records must be kept and maintained for at least five years beyond their creation.

Animal ID: Ruminant, Non-ruminant and Poultry

An MCS inspector will annually perform spot checks of animals on your farm and will ask to see records. Records should include origins, healthcare and management. An inspector may ask to see records for an animal that was on the farm the previous year. In the case of an animal that is recently deceased, sold, or shipped for slaughter, the inspector expects to be able to see all records associated with the animal. Inspectors will also ask to see receipts and other documentation for new animals in order to verify o For animals lacking distinguishing features (e.g., Black Angus), ear tags are recommended. Tattoos, small metal

ID tags, and IDs associated with registrations are considered a good form of permanent identification and meet the requirements for organic certification. Consult with Registry Associations for industry accepted and breed appropriate animal identification methods. Forms of ID that are easily removed or impermanent are not considered suitable as the primary form of ID, such as neck chain tags, ankle bands, etc., but may be suitable as a secondary form of ID. For example, collar name tags alone would not be permitted, but for a herd or flock that also carries tattoo ID in the ears, could be acceptable as a secondary form of ID. Individual animal records tracing back to the last third of gestation must list both primary and secondary IDs if there are two forms. Double ID may also consist of the same ear tag in each ear. rganic status.

MCS accepts a variety of systems provided that the producer demonstrates a commitment to using it and that the inspector can access and interpret records with relative ease. MCS will evaluate recordkeeping systems on a case-by case basis, with the help of the inspector's evaluation.

You must reliably identify organic animals to demonstrate that origins and health care practices meet requirements for organic production of livestock products such as milk or fiber, or for organic slaughter. Identification methods that are not easily tampered with and a commitment to record keeping are necessary for organic certification of livestock. Double ID is strongly recommended for methods of ID considered impermanent, such as ear tags, to avoid situations where animals have lost their ID and can no longer be verified as organic.

Ruminant ID

Ear tags may be permitted. Unique, consecutive long numbers must be used (e.g., DHIA ear tags, USDA 840 ear tags) and an additional identifier such as a farm name, dam name, and/or date of

birth should also appear on the tag. It is recommended to use the same type and color of tag consistently when tagging offspring to provide a readily auditable system. Photos (associated with names/numbers) are permitted for animals (other than poultry) with distinguishing marks or features. For cattle, a calf stage photo is required, unless the animal arrives as an adult from outside the farm.

For animals lacking distinguishing features (e.g., Black Angus), ear tags are recommended. Tattoos, small metal ID tags, and IDs associated with registrations are considered a good form of permanent identification and meet the requirements for organic certification. Consult with Registry Associations for industry accepted and breed appropriate animal identification methods.

Forms of ID that are easily removed or impermanent are not considered suitable as the primary form of ID, such as neck chain tags, ankle bands, etc., but may be suitable as a secondary form of ID. For example, collar name tags alone would not be permitted, but for a herd or flock that also carries tattoo ID in the ears, could be acceptable as a secondary form of ID. Individual animal records tracing back to the last third of gestation must list both primary and secondary IDs if there are two forms. Double ID may also consist of the same ear tag in each ear.

Non-Ruminant ID: Swine

Depending on breed, ear tagging and tattooing can be accepted. Ear notching of pigs is permitted when other methods will not work. Notching should be done when piglets are no more than a few days old. Brood sows must be identified, and records kept for each litter of piglets (individual piglets for sale do not need individual identification, only litter identification. Piglets raised for slaughter do need individual identification).

(continued on Page 6)



Livestock Record Keeping, (Continued from Page 4)

Brood Stock ID - for Ruminants and Non-Ruminants

When using non-organic brood stock to produce organic offspring, each dam must bear an ID linking to records documenting that the dam has been under organic management beginning no later than the last third of each gestation for the offspring from that gestation to be certified organic.

Poultry ID

In poultry production, use of different breeds and leg bands are considered acceptable methods of flock identification. For purchased chicks, we will look for hatchery receipts or record of organic management beginning at the 2nd day of life (in other words, when the chicks arrive from the hatchery). Poultry over one day old must be purchased from certified sources.

[§205.236 Origin of Livestock](#) & [§205.103 Record Keeping](#)

Feed Sources, Supplies and other Inputs

Feed records will document all purchased and farm-produced feeds. Harvest records must document feeds produced on farm. Purchased feeds should be accompanied by a receipt and the organic certificate of the supplier. Amounts should be sufficient for livestock needs over the time period recorded. Likewise, receipts and labels for supplies, inputs, and materials used in your organic livestock production must be kept and available at inspection. These include minerals, salt, herbal preps, medicines, facility inputs, and any other inputs used in the production of the organic product.

[§205.237 Livestock Feed](#)

Special Note for Ruminant Livestock - "The Pasture Rule"

Ruminant livestock groups are required to meet the "Pasture Rule"—a NOP standard stating that ruminant livestock must graze throughout the entire grazing season (which can be no less than 120 days), and ruminant livestock must obtain a minimum average of 30% of their intake from pasture for the season, on a dry matter basis.

Producers must keep the following records to demonstrate compliance with the pasture rule:

1. Turn out dates and feed records to show the length of the grazing season.
2. Ration records indicating the amounts of hay, silage and grain fed to animals during the grazing season and non-grazing season.
3. Evidence that pasture quality is being maximized.
4. Records noting days when animals are confined from pasture and the reason for confinement.

[§205.237\(c\)&\(d\) Pasture rule and grazing season record](#)

Healthcare

Health care records include routine treatments and non-routine treatments, with individual animal ID linked, and should be kept in the operation's herd records or a herd book. Routine treatments may be documented in standard protocols. Poultry producers must keep records on flocks of birds that can verify compliance with the Standards. Certain "National List" allowed or restricted synthetic substances may be considered under specific circumstances. Some items have restricted uses. Please contact MCS for approval prior to using a restricted medication.

[§205.603 Allowed Synthetic Substances and Medications](#)

An example of proper use of a restricted material and record keeping:

Dairy goat showing physical signs of worms. Garlic treatment was not effective on this particular individual, vet fecal demonstrates infestation. Contact MCS for product approval. Treatment with Fenbendazole is recorded on individual goat health card to show she may never be organic for slaughter, and barn wall calendar to verify 36-day milk withholding.

Income

In order to verify that organic production on your farm balances with sales, gross income from organic livestock sales must be documented and viewable by your inspector. Producers must be able

(continued on Page 10)

The "Bad":

- Testing requirements are onerous, requiring tests of every lot harvested, not allowing for random testing
- Testing is of total THC (post-decarboxylation), not just Delta-9, which may make several varieties ineligible for hemp
- Sample requirements do not require a homogenized whole plant sample, making a representative test of total plant biomass not possible (more THC in flowers than stocks and stems)
- Samples must be taken by a USDA-approved sampling agent or law enforcement agent authorized by USDA to collect samples
- Negligence v. Intentional determined at 0.5% THC content (moving to criminal above 0.5%). Crops still testing above 0.3% THC content must be destroyed
- Harvesting must be completed within fifteen (15) days of sampling, a very short window, not accounting for weather, equipment breakdown, and delays with obtaining laboratory results
- Ninety (90) day application period for USDA licenses after initial year-round allowance (Oct-Dec). May not be the right time of the calendar year given harvest timing
- DEA-registered lab mandate (can typically take 9-12 months to get registered)
- Disposal of "hot" hemp (crops testing over legal limit) can only be done by DEA or approved "handler" of marijuana

It is assumed that Maine will be submitting a plan to USDA to oversee production in our state. Commissioner Beal released a statement on October 29, 2019 noting that the department was pleased to finally have guidance for states. We encourage growers to contact the state for more information.

(continued on Page 11)



Strengthening Organic Enforcement: NOP Proposed Rule Overview

The Agricultural Marketing Services National Organic Program (NOP) has drafted a proposed rule, Strengthening Organic Enforcement (SOE), to reinforce the oversight and enforcement of the production, handling and sale of organic products. The proposed rule would implement provisions in the 2018 Farm Bill, and include other provisions based on NOP's experience and National Organic Standards Board (NOSB) recommendations. AMS expects to publish a proposed rule by end of 2019, opening a public comment period.

Transforming the organic regulations to meet market needs:
Increasing accountability and visibility



USDA Agricultural Marketing Service (AMS)
National Organic Program (NOP)

Organic Certification Cost-Share Update

The 2018 Farm Bill provides \$24 million in new mandatory funding for the National Organic Certification Cost Share Program (NOCCSP) and directs USDA to first utilize \$16.5 million in carryover funds from previous years' program operations, bringing the total funding available to \$40.5 million. \$1 million in annual mandatory funding for the certification cost share assistance payments under the Agriculture Management Act (AMA) will continue for organic farmers in 16 designated states, of which Maine is one.

On April 29, 2019, USDA published a notice of funding availability for both the NOCCSP and the AMA programs. https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdfiles/organic-certification-cost-share-program/pdf/occsp_nofa_2019-08624.pdf. As in the past, State Departments of Agriculture were able to apply for grant agreements to administer the NOCCSP program in fiscal year (FY) 2019. State Agencies that establish agreements for FY 2019 may be given the opportunity to extend their agreements and receive additional funds to administer the program in future years.

The Maine Department of Agriculture, Conservation and Forestry (MDACF) continues to administer the federal cost-share program for MOFGA Certification Services and Maine producers. MCS received notification that the delayed USDA release of funds had finally begun the end of October and MDACF would begin processing checks starting with those in our first reimbursement file for the year, which was submitted in July.

If you haven't yet received your cost-share reimbursement for 2019 please contact the MCS office.

Livestock Record Keeping, (Continued from Page 6)

to provide a reasonable audit trail and mass balance records for the livestock products that are produced and sold as organic. Records to track production and sales include date and weight at slaughter, milk production records, or egg production records. §205.103 Record Keeping income and sales

Resources

Record keeping is covered at length in our annual Practice Manual: https://mofgacertification.org/wp-content/uploads/MCS_2019PracticeManual.pdf. You can search contents directly from the MCS website or download it as a PDF. The MCS website is easy to

navigate and full of useful information and forms. Recordkeeping Forms and templates may be found here:

<https://mofgacertification.org/record-keeping-for-organic-producers/>

https://mofgacertification.org/wp-content/uploads/Livestock_Recordkeeping_Checklist_FINAL.pdf

<https://www.ams.usda.gov/sites/default/files/media/Poultry%20-%20Guidelines.pdf>

If you have any questions about livestock record keeping, please reach out to MCS for general assistance at certification@mofga.org or contact your MCS specialist directly.

