



• Organic Control Points

Prevention of Commingling and Contamination

An Organic Control Point (OCP) is defined as an area of a farm or handling operation where there is potential for either the commingling of organic and non-organic or the contamination of organic product with prohibited materials.

There are 2 sections of the NOP rule that require organic producers to prevent the commingling of organic and non-organic products and the contamination of organic product with prohibited materials; Section 205.201(a)(5) and Section 205.272

Although not a complete list, common OCPs for farm and livestock operations are: adjoining non-organic land and pest and disease management on that land, pest and weed management along roadways, origin of livestock, origin of off farm feed, reuse of boxes, use of custom operators and their equipment, borrowed equipment, harvesting and transport equipment, separation and storage of prohibited substances, and management of livestock treated with prohibited substances. While common OCPs for handling operations include cleaning and sanitation products, pest control storage and use, storage areas for ingredients and finished products and transport units.

Your Organic System Plan, also known as your Application or Annual Update, must address all potential OCPs and what steps you take and records you keep for each OCP to prevent commingling or contamination.

For example: if you borrow your neighbor's tractor and rototiller or you have your neighbor "custom till" your fields, you must document that both the tractor and the rototiller were cleaned and/or purged prior to being used on your field. This is not only a good organic contamination practice but a disease control Best Management Practice. Another example: if you have a field of grain that abuts a neighbors non-organic field of grain you may either maintain an adequate grassed buffer strip between the fields or harvest an adequate buffer area and record either the disposal of the product or the sale of the harvested product as non-organic. One final example, if you buy in organic hay from an off-farm source you must maintain records of the amount received, usually an invoice, and of the organic status of the feed, usually a copy of the vendor's most current certification certificate that states their hay is organic and they are currently certified organic.

On May 9, 2011 the USDA-NOP issued a guidance document on commingling and contamination to all accredited certifiers, MOFGA Certification Services (MCS) being one

of them. In this document the NOP states that certifying agents must verify that all production and handling operations have adequately identified their OCPs and have implemented adequate practices and procedures to prevent commingling and contamination and that these practices are documented.

What this means for you the producer is that your inspector will verify that all OCPs have been listed in your Organic System Plan and that you have appropriate records or documentation to indicate prevention of any commingling or contamination.