

A Guide for Conventional Farmers Transitioning to Organic Certification

This guide is focused on assisting farmers who want to transition to organic certification. The steps in this guide are not necessarily designed to be completed in order. Additional specific information is included at the bottom of this document for farmers who want to certify livestock.

1. **Familiarize yourself with the USDA organic standards.** General information about the organic standards may be accessed at www.ams.usda.gov/nop. Click here for the full text of the [USDA organic regulations](#).

It is important to understand the requirements for certification. Specifically, these regulatory sections of the USDA organic standards, 7 CFR 205, may be of particular interest to transitioning farmers:

- 205.103 - Recordkeeping by certified operations
- 205.201 - Organic production and handling system plan
- 205.202 - Land requirements
- 205.203 - Soil fertility and crop nutrient management practice standard
- 205.204 - Seeds and planting stock practice standard
- 205.205 - Crop rotation practice standard
- 205.206 - Crop pest, weed, and disease management practice standard
- 205.601 - Synthetic substances allowed for use in organic crop production
- 205.602 - Nonsynthetic substances prohibited for use in organic crop production.

For livestock producers the following sections will be important for you in addition to the sections above.

- 205.236 - Origin of livestock
- 205.237 - Livestock feed
- 205.238 - Livestock health care practice standard
- 205.239 - Livestock living conditions
- 205.240 - Pasture practice standard
- 205.603 - Synthetic substances allowed for use in organic livestock production
- 205.604 - Nonsynthetic substances prohibited for use in organic livestock production

- General Certification Requirements
- 205.400-205.406

2. **Learn how to farm organically. Get familiar with all other resources available to organic farmers.** Remember that your farm must be managed organically throughout the entire transition period. There are a number of resources you may use during your

transition, and they include:

- The National Organic Program Website: www.ams.usda.gov/nop
- The National Sustainable Agriculture Information Service: www.attra.org
- The Organic Materials Review Institute: www.omri.org
- Local organic educational organizations. Many states have organic educational organizations that hold workshops, seminars, and conferences. There are also regional and national trade organizations.
- State organic extension programs
- Mentors

3. **Learn about organic system plans (OSPs), what they are, and how their requirements may shape your future organic farm.** Organic certification (7 CFR 205.201) requires that you create an organic system plan OSP. This plan will describe all of your organic farming practices and is the basis of your organic certification.

Typically when you fill out the application forms for organic certification you are creating an OSP, so you do not need to write a plan prior to getting certified, but it is important that you understand that a plan is required and you begin structuring your operation accordingly.

An OSP should be integrated and comprehensive. Every plan begins with a decision of what crops will be grown, whether to raise livestock or process food, and how each aspect will be marketed. After that you should begin to develop answers to the following questions:

- Do my fields have adequate fertility or will I need to supplement to grow my crops?
- Do I have all of the equipment I need to grow my crops organically? (Organic farms often require different tillage and weed control equipment than conventional farms.)
- What pest and disease control issues will I face? Do I understand what organic controls are allowed?

4. **Choose a certifying agent.** The list of accredited certifying agents may be found on the [National Organic Program \(NOP\) website](#). Choosing a certifying agent is up to each individual farmer. You may choose from any of the certifying agents that work in your geographic area. Farmers choose certifying agents for a variety of reasons – certification fees, customer service, geographic location, certification forms and procedures, etc. Shopping for a certifying agent is similar to shopping for any service provider. Choose an agent that meets your needs that you are comfortable dealing with.

5. **Contact your certifying agent and get a copy of the forms for organic certification and the procedures for certification.** Even if you are not going to apply for organic certification immediately it is beneficial to understand the requirements for certification in advance of, and during, the planning stages.
6. **Visit the websites of your chosen certifying agent, the Organic Materials Review Institute ([OMRI](#)), or the Washington State Department of Agriculture ([WSDA](#)) for further reading on what materials, substances and products may be used by organic operators.** Most, but not all certifying agents allow the use of OMRI and/or WSDA approved materials to be used in organic system plans. Check with your certifying agent to see what materials they allow.
7. **Select land to transition and establish dates of last prohibited inputs.** 7 CFR 205.202 of the USDA organic regulations specifies that land used to grow organic crops must have been managed in accordance with 7 CFR 205.203 – 206 of the regulations, and have had no prohibited substances applied to it for three years. Prohibited substances include most synthetic fertilizers, herbicides, and pesticides. Only synthetic substances listed in 7 CFR 205.601 of the regulations are allowed. Most nonsynthetic substances are allowed but substances listed in 7 CFR 205.602 of the regulations are prohibited as well.

Sometimes transitional farmers delay their transition because they unknowingly use certain inputs that have prohibited substances in them. Some problematic substances include treated seed, synthetic binders in pelletizing agents, synthetic wetting agents, prohibited fiber pots, etc.

If you have questions about what substances are allowed or prohibited contact your certifying agent.

Most certifying agents will require that you document the last application date of a prohibited substance. Documenting this date and completing any required affidavits should occur as early as possible in the transition process.

8. **Develop a general nutrient/cropping plan for your transitional period. Conduct soil testing if needed.** Organic crop management encourages the use of cover crops and green manures. Start identifying and planting cover crops and green manures that work in your soils and in your rotations.

The health and composition of the soil is very important, as it is the soil itself that will eventually determine the capacity to produce healthy crops. A soil test will help track the flow of nutrients so that adequate levels of nutrients can be applied in order to maintain optimum nutrient levels. Soil tests are also valuable for justifying the use of soil amendments especially micronutrients.

If you are farming large acreage, consider applying for Environmental Quality Incentives Program ([EQIP](#)) funds for transition or consider developing a resource management

plan. You could also talk to the National Resources Conservation Service ([NRCS](#)) about programs for organic farms.

EQIP: Environmental Quality Incentives Program

EQIP provides financial and technical assistance to agricultural producers in order to address natural resource concerns and deliver environmental benefits such as improved water and air quality, conserved ground and surface water, reduced soil erosion and sedimentation or improved or created wildlife habitat.

NRCS: National Resources Conservation Service

NRCS helps farmers, ranchers and forest landowners conserve soil, water, air and other natural resources. All programs are voluntary and offer science-based solutions that benefit both the landowner and the environment.

9. **Keep records and save your receipts throughout the entire transition period.** 7 CFR 205.103 of the USDA organic regulations requires that records be detailed enough to be readily understood and auditable, that they disclose all activities and transactions, that they be maintained for five years, and that they be sufficient to demonstrate compliance with the standards. The National Center for Appropriate Technology's (NCAT) Appropriate Technology Transfer for Rural Areas ([ATTRA](#)) is a good resource for recordkeeping forms.

Tips and reminders for record keeping:

- Design a system that will work for you and that you are comfortable maintaining whether you use: paper records, a single notebook, or a computer. It doesn't matter what type of system you use as long as your system meets all of the requirements specified above.
- Your record keeping system has to disclose all activities so it must cover all activities from purchase of seeds and inputs, through field preparation, seeding and transplanting, fertility management, pest, weed, and disease control, and ending in crop harvest and sale. The records have to be auditable so theoretically if you are a lettuce grower your organic inspector could trace your organic lettuce production from purchase of seeds through seeding, to fertility and field management, to harvest, and to sale.
- Detail on records is important. It is important to record amounts, locations, names of inputs, varieties of crops, etc.
- Your certifying agent will review and audit your records. Talk to your certifying agent to get an understanding of what records they will require from your farm.

10. **Be mindful to never commingle organic crops with non-organic crops and never to allow organic crops to be contaminated by prohibited substances.** Operations that have both organic and non-organic production must have plans in place for preventing commingling and contamination. In general, organic crops will have to be kept

segregated from non-organic crops and be easily identifiable as organic during the inspection process. Shared equipment, including equipment of any kind may be a point of possible contamination. Plans will need to be developed to show that equipment is cleaned and/or purged before it is used on organic fields and crops. Equipment cleaning plans must extend to any equipment rented for use on farm, or the equipment of custom applicators hired to apply organic inputs to fields.

11. Review your use of treated lumber on your farm. 7 CFR 205.206 of the USDA organic regulations prohibits the use of lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock. If you have treated lumber already installed on your farm you will need to disclose it as part of your application for organic certification. You need to identify alternative construction materials to use for new installations. If you have questions contact your organic certifying agent.

12. Plan your organic crop rotation, fertility plan and pest/disease management plan. 7 CFR 206.205 of the USDA organic regulations requires that your crop rotation plan maintains or improves soil organic matter, provides for pest management, manages deficient or excess plant nutrients, and provides erosion control. You may use sod, cover crops, green manure crops, and catch crops to achieve these goals.

The pest, weed, and disease management regulations are found in 7 CFR 205.206. They require a succession of management practices for the management of pests, weeds, and diseases. A compliant pest, weed, and disease plan will include a variety of practices to control pests, weeds, and disease and not just the reliance on allowed pesticides or herbicides.

13. Plan your organic markets and understand their requirements.

14. If your product will be packaged or labeled, learn about labeling and packaging requirements for organic foods. Review USDA organic labeling regulations in section 7 CFR 205.300 – 205.311 and design your labels. Labels will need to be submitted to your certifying agent for review and approval prior to use.

15. Review the seed and planting stock regulations in section 7 CFR 205.204 of the USDA organic regulations. Research organic crop and cover crop seed suppliers, organic annual seedling suppliers, and organic planting stock sources. You will need an understanding of what is and is not available organically, and what you are allowed to purchase from non-organic sources. Consider planting perennial planting stock at least a year before certification.

16. Complete the organic application forms for your certifying agent and apply for certification. Each certification agency has different deadlines. Make sure you understand when you have to submit your paperwork so you can be certified for your

first organic crop. Organic crops have to be inspected before harvest so make sure you have enough time between the time you submit the paperwork and your crop harvest for the certifying agent to get you certified.

Typically the organic certification process requires the certifying agent to receive your application, do an initial review of your application to determine compliance, schedule and inspect your operation, and then do a final review of your application and inspection report in order to make a certification determination. Every certifying agent requires different amounts of time to complete this process. Talk to your certifying agent early in the process so you understand what timeframes they need to get you certified.

For Farmers Considering Certification of Livestock

If you are going to certify livestock there are different standards and different requirements that apply to your operation. It is important that you review the livestock standards and contact your certifying agent early in the transition process.

If you are planning to transition dairy animals at the same time as land, see 7 CFR 205.236 of the USDA organic regulations. Dairy animals have to be transitioned just as land needs to be transitioned. In order to be sold as organic, milk or milk products must be from animals that have been under continuous organic management for 12 months prior to the production of milk or milk products that will be sold as organic. Once an entire distinct herd has been converted to organic production all dairy animals must be under organic management from the last third of gestation.

Because organic milk and milk products may not be sold as organic until dairy animals have completed their transition, it is important to determine what date you will likely be able to begin full organic management of animals (usually it will be the start of the grazing season in the first year that all fields will be eligible for certification). For example, count back 12 months from there, and that will give you the date that your transition will begin for your dairy animals. During the transition period you may feed crops and forage from your land that is in the third year of organic management but all other feed must be organic.

See 7 CFR 205.237 for the complete regulations for livestock feed for organic animals. Some certifiers require that organic dairies submit applications during the third transition year. Check with your certifying agent to see what policies and procedures they have for transitional dairies.

If you are planning to certify organic slaughter stock or poultry there are different standards than for organic dairies. See 7 CFR 205.236 for the complete regulations for the origin of poultry and slaughter stock. Poultry and slaughter stock do not need to be transitioned like dairy animals. Instead poultry may only be certified if it has been under continuous organic management beginning no later than the second day of life. If you are going to certify poultry you will need to be able to show that the poultry has been managed to this requirement.

Slaughter stock may only be certified if the breeder stock used to produce the slaughter stock is

managed organically from the last third of gestation. Unlike with dairy stock you may not feed transitional crops and forage to breeder stock, so many livestock farmers raising slaughter stock certify their crops and fields first, and then their livestock.

Lastly, don't forget to line up purchased organic feed and supplement sources well ahead of times.

For Further Reading & Questions

Visit www.ams.usda.gov/nop for general information about transitioning to organic certification.

The full text of the [USDA organic regulations](#) can be found online at the U.S. Government Publishing Office (GPO) website in the Electronic Code of Federal Regulations (e-CFR). The sections of most interest to transitioning farmers are included in the body of text above.

You may direct any further questions to your certifying agency.

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