



## Voluntary Certifications

# Organic Certification

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The WSDA Organic Food Program is accredited to certify organic producers, handlers, processors and retailers to the USDA National Organic Standards. WSDA is also accredited to certify operations in accordance with international organic standards. This fact sheet provides an overview of the requirements to market your crops and products with the organic claim, including:

- USDA’s National Organic Program and National Organic Standards;
- Organic labeling;
- Recordkeeping requirements for certified operations;
- Recordkeeping requirements for organic handler and processors;
- Approved materials for organic production;
- The WSDA Brand Name Material List (BNML);
- Organic Material Review Institute (OMRI);
- Five steps to organic certification with WSDA; and
- WSDA Organic Program fact sheets and contacts.

### USDA’s National Organic Program and National Organic Standards

All products sold, labeled, or represented in the United States as “organic” must comply with the United States Department of Agriculture’s (USDA) organic regulations. Within the USDA, the National Organic Program (NOP) develops, implements, and administers national production, handling, and labeling standards for organic agricultural products. The NOP also accredits third party certifying agents (foreign and domestic) to inspect and evaluate organic production and handling operations and certify businesses that meet the National Organic Standards. Producers may become certified organic through any accredited certifier. The USDA National Organic Program’s website is [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop).

All organic certification is voluntary. However, operations, or portions of operations, that produce or handle agricultural products that are intended to be sold, labeled, or represented in the US as “100 percent organic,” “organic,” or “made with organic ingredients” must be certified by a USDA NOP accredited certifying agency.

The WSDA is an accredited third party certifying agent. Please contact the WSDA Organic Food Program for additional information and assistance.

#### **How is organic production defined?**

The National Organic Standards define organic production as a system that is managed in accordance with the USDA organic regulations and responds to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.

### **What does transition to organic mean?**

Transition describes the time period between the last prohibited material application and when the land becomes eligible for the organic status. The National Organic Standards require that all land used to produce organic crops and livestock must have had no prohibited substances applied to it for a period of three years immediately preceding harvest of the product.

Products certified as “transitional” must meet the same production and handling requirements as an organically certified product, except that the land must have no applications of prohibited materials for one year prior to harvest, rather than the three years required for organic. Producers whose land is in transition can apply for Transitional certification through the WSDA.

### **Do I need to be certified if I sell less than \$5,000 a year?**

Producers, processors, and handlers that sell less than \$5,000 a year in organic agricultural products do not need to be certified to make an organic claim. While exempt from certification, these producers and handlers must still abide by the USDA organic regulations and are subject to surveillance inspections. Additionally, retail operations and some handlers (brokers, grocers, and distributors) are not required to be certified. Exempt or excluded handlers and processors may choose to obtain certification due to market demands or to increase consumer confidence of their products and practices.

### **How long does it take to get certified as an organic food producer or handler?**

The certification process through WSDA takes an average of 3½ months. Incomplete application packets will delay the certification process. Application packets should be submitted early in the season to allow time for the inspection and review process. Organic crops may not be certified after they have been harvested, and organic processed products may not be certified after they have been processed and released.

### **What is the cost of organic certification?**

The fees associated with organic certification are based on the operation’s gross annual income of organic crops or products and the type of certification services requested. The WSDA Organic Food Program fee schedules are outlined in the WSDA Organic Rules and Regulations Book (WAC 16-157) and in the application packets. Certification fees must be paid annually.

While previous Farm Bill legislation included cost share funding for organic certification, at the time of publication, organic certification cost share was no longer available. Please check with the Organic Food Program for an update on availability of funding to help with the application fees.

### **How often do I have to renew my application for certification?**

Organic certification is an annual process. To remain compliant your operation must submit an application, organic system plan update, and fee every year. WSDA’s renewal application packets are mailed in December for producers and in January for handlers and processors. To avoid late fees of \$100 per month, renewal applications must be received in the office by February 1st for producers and March 1st for handlers and processors.

### **What is a Producer?**

A “producer” is someone who grows or produces crops or livestock products. There is a distinction made between crop producers and livestock producers, and livestock producers are further defined as

ruminant livestock producers (beef, dairy, lamb) and non-ruminant livestock producers (poultry, eggs, pork). Organic crops and livestock must be produced in accordance with the USDA organic regulations to be sold or labeled as an organic product.

### **What are the requirements for producers of organic crops and livestock?**

Organic crop production must occur on sites that have been free from prohibited materials for at least 3 years and must be managed without the use of prohibited materials. Organic livestock production requires that animals be fed 100% organic feed, have access to pasture for ruminants and access to the outdoors for non-ruminants, and prohibits the use of antibiotics and hormones. All producers must complete an Organic System Plan relevant to their type of operation and maintain detailed records of their production practices. An annual on-site inspection verifies that the Organic System Plan is accurate and that the operation's production practices are compliant with USDA organic regulations.

### **Can I be a certified organic producer if I also grow conventional crops?**

Yes, an adequate buffer zone must be in place to prevent the unintended application (i.e., spray drift) of a prohibited substance on an organic crop and procedures must be in place to prevent organic crops from being contaminated. Recordkeeping must clearly differentiate the organic and conventional aspects of an operation.

### **What is a Handler?**

A "handler" is someone who sells, brokers, distributes, packs, or labels organic products. Handlers of organic products must maintain the identity of organic food and prevent contamination with prohibited substances. Organic products can be identical in appearance to nonorganic products, therefore all labels and documents must clearly identify the product as organic. Handlers of organic products must demonstrate that they have procedures in place to maintain the identity and segregation of organic products at all times.

### **What is a Processor?**

A "processor" is someone who engages in canning, freezing, drying, dehydrating, cooking, pressing, powdering, packaging, baking, heating, mixing, grinding, churning, separating, extracting, cutting, fermenting, eviscerating, preserving, jarring, slaughtering, or otherwise processing of organic food products. Processed organic products contain organically grown ingredients and do not contain artificially derived preservatives, colorings, flavorings or other artificial additives. Processed organic products comprised of both organic and nonorganic ingredients are subject to specific labeling restrictions on the use of the term "organic."

### **What are the requirements for handlers and processors of organic food?**

There are seven key requirements for organic handlers and processors:

1. Processors and handlers must complete and submit an application packet including an Organic System Plan.
2. Procedures must be in place to ensure that no commingling or misidentification occurs between organic products and non-organic products.
3. Prohibited substances used within the processing or handling facility must not come in contact with or contaminate the organic products.
4. A list of all ingredients used in organic products must be provided.
5. All organic ingredients must be certified according to USDA organic regulations, and by USDA-accredited certification agencies.

6. Labels for all organic products must be submitted and approved prior to obtaining organic certification.
7. All organic products must be processed with only approved minor ingredients and processing aids.

## Organic Labeling

### What Kind of Claims Can I Make?

Labeling organic products is strictly defined and regulated both for retail packaging and non-retail containers only used for shipping or storage. All product labels and marketing information that make an organic claim must comply with Subpart D of the USDA organic regulations (Sections 205.300 - 205.311). These sections outline product composition requirements, along with labeling requirements for the different composition categories.

### Retail Packages

There are four distinct types of organic claims that may be made on retail packaging.

**100% Organic Claims.** These apply to products made entirely of 100% organic ingredients and processing aids. The product label identifies all organic ingredients as “organic” on the ingredient statement and includes the statement “Certified Organic by Washington State Department of Agriculture,” or other USDA-accredited certifier. The use of the USDA and WSDA organic seals are optional.

**Organic Claims.** This claim applies when the product is made with at least 95% organic ingredients, only approved non-organic minor ingredients and processing aids are used, all organic ingredients are identified as “organic” on the ingredient statement, and the label includes the statement “Certified Organic by Washington State Department of Agriculture,” or other USDA-accredited certifier. The use of the USDA and WSDA organic seals are optional.

**Made with Organic (Specified Ingredients) Claims.** This claim applies when the product is made with at least 70% organic ingredients, all organic ingredients are identified as organic on the ingredient panel, and the label includes the statement “Certified by Washington State Department of Agriculture.” Non-organic ingredients must not be produced using prohibited practices (e.g., Genetically Modified, Sewage Sludge, Ionizing Radiation). The use of the WSDA organic seal is optional. The use of the USDA seal is not permitted.

**Organic Claims in Information Panel Only.** This claim is used when the product is made with less than 70% organic ingredients. If the percentage of organic ingredients is displayed in the information panel, the organic ingredients must be identified as “organic” in the ingredient statement. **If organic claims are limited to the information panel, the product is exempt from certification under the National Organic Standards (Section 205.101).**

### Organic Labeling for Non-retail Containers

There are regulations for labeling any container used only for shipping or storage of an organic agricultural product. The container must be traceable back to an organic product and must display the production lot number of the product, if applicable. In addition, non-retail containers may also be labeled with the term “organic”; special handling instructions to preserve the product’s organic integrity; the USDA and WSDA organic seals; and the statement “Certified by Washington State Department of Agriculture.”

### **Other Organic Labeling Requirements**

The USDA organic regulations also outline requirements for the labeling of non-packaged products sold at retail stores (such as bulk containers), as well as the labeling of products that are produced at operations that are exempt or excluded from certification. Refer to Sections 205.308-310 within the USDA organic regulations or contact your certifier for details on these types of label claims.

### **Recordkeeping Requirements for Certified Operations**

A major requirement of the USDA organic regulations is the maintenance of all records related to organic production and handling. These records must be available during an inspection and must be easily understood. An audit of your records will be conducted during an organic inspection to verify certification requirements have been followed. Complete and accurate records must be kept that track the organic products from seed to harvest, or from receiving through final sale and shipping. Examples of records maintained by organic producers are listed as follows. Please note this is not a comprehensive listing.

#### **Records for Organic Crop Producers**

- Invoices, organic certificates, verification of attempts to find organic sources for seeds, annual seedlings and perennial planting stock.
- Invoices and shipment documents for material inputs purchased and records for when all material inputs were applied.
- Production records such as planting, cultivation, weeding, farm equipment cleaning, farm consultant recommendations, soil analysis results.
- Harvest records including production yields, shipping documents, delivery tickets.
- Sales records including daily market records, CSA sales receipts (if applicable), bank deposits, warehouse sales summaries, invoices for buyers, purchase orders from buyers.

#### **Records for Organic Livestock Operations**

- Organic verification (i.e., organic certificates and invoices) for all feed, including pasture, grain, hay or silage.
- Grain invoices with weights from your grain company.
- Somatic cell counts for the last 6 months (dairy only).
- Animal medical treatment records (including vaccinations).
- Animal sale or purchase records, if applicable.
- Sales records including daily market records, CSA sales receipts (if applicable), bank deposits, and customer invoices.

#### **Records for Production Sites**

- Material application records to verify that the land has been under organic management for at least 36 months prior to harvest.
- Cropping history or land use for at least 3 years.
- If the land was previously certified organic, have the Organic Certificate available.
- Lease Agreements for any leased ground.
- Documents and maps from other agricultural agencies (NRCS, Farm Service, etc.)

## Recordkeeping Requirements for Organic Handler and Processors

### Receiving Records and Ingredient or Product Compliance Records

As an organic handler or processor, you need to have information detailing the amount of product received by your operation and information detailing the organic status or compliance of an incoming product. More specifically, this includes:

- A current organic certificate for each supplier of organic products or ingredients must be on hand. All organic products sold in the United States must have documentation that verifies the product was certified by a USDA-accredited certification agency and that the product was specifically certified according to USDA organic regulations.
- Compliance affidavits.
- Field or bin tickets.
- Clean truck/equipment affidavits.
- Invoices, purchase orders, bill of lading, scale tickets.
- Contracts.
- Certificates of analyses or Product Specification Sheets.

### Production and Storage Records

You also need information detailing the handling or processing of organic products at your operation. This includes:

- Equipment clean-out logs.
- Product specification sheets and ingredient inspection forms.
- Batch recipes and product formulations.
- Ingredient usage reports and production logs.
- Quality control reports.
- Waste and shrinkage logs.
- Inventory reports for ingredients and finished products.
- Packaging reports.
- Pest management records.

### Sales and Shipping Records

In terms of sales and shipping records, you will need information detailing the sale of finished product from your operation, such as:

- Pallet/tote tickets and scale tickets.
- Certificates of analyses.
- Purchase orders and sales journals.
- Shipping logs and bills of lading.
- Export records and transaction certificates.

## Approved Materials for Organic Production

In order to comply with USDA organic regulations, producers, processors, and handlers must use input materials and substances that are in compliance with the regulation. Both the active ingredients in a substance, as well as any inert or minor ingredients, must fully comply with USDA organic regulations to be used in or on organic crops, products, or sites. The “National List,” Sections 205.601-205.606 of the USDA organic regulations, outlines the substances that are allowed and prohibited for use in organic

production and handling. The National List can be found in the WSDA Organic Rules and Regulations Book and at the National Organic Program website: [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop).

### **Crop Production**

The USDA organic regulations allow the use of all natural substances unless they are specifically prohibited. (For example, strychnine and nicotine are prohibited.) Synthetic substances are prohibited unless they are specifically allowed according to the USDA organic regulations. Sections 205.601 and 205.602 contain the list of allowed and prohibited substances for use in organic crop production.

Soil fertility may be maintained or improved through the application of natural or approved synthetic fertilizers. Many approved synthetic fertilizers have restrictions or annotations regarding their use and should be considered carefully prior to their application. Natural and approved synthetic substances are also used for insect, weed and disease control in organic farming systems when a preventative plan is not adequate to avert pest pressure.

### **Compost and Manure**

Compost and manure are natural soil amendments that are approved for organic production, but they must meet certain requirements to avoid restrictions. Raw, aged, and liquid manure must be applied at least 90 days prior to the harvest of crops whose edible portion does not come into contact with the soil (e.g., apples) and 120 days prior to the harvest of crops whose edible portion does come into contact with the soil (e.g., potatoes). Additionally, any compost that contains animal materials or manures is subject to these same preharvest intervals unless the compost has been produced in accordance with the USDA organic regulations Section 205.203. Compost that contains only plant material can be applied without restrictions.

### **Livestock**

Materials approved and prohibited for use in organic livestock production can be found in the USDA organic regulations, Section 205.603 and 205.604. These material lists include the requirements around feed additives, vaccines and biologics, medications, and any other production aid used in an organic livestock system. Natural substances are approved for use in organic livestock systems, such as herbal remedies or naturally derived enzymes. All synthetic medications are prohibited, unless specifically allowed in Section 205.603. Prior to using a material in livestock production, evaluate the substance carefully and verify there are no synthetic binders, colors or artificial flavors in the product.

### **Processing Aids and Post-Harvest Materials**

Certain materials are approved for use as “processing aids” and “post-harvest materials.”

*A processing aid* is a substance used during processing that is either removed in some manner or is present at insignificant levels in the finished food product. Examples of processing aids include defoamers, fruit waxes, enzymes, or substances used as filters. Non-organic ingredients in processing aids must appear on the National List of Allowed and Prohibited Substances, Section 205.605 or Section 205.606.

*Post-harvest materials* include any substance, material, structure, or device that is used in the post-harvest handling of agricultural products. Post-harvest materials are used on crops that are not processed. Post-harvest products include floating agents, ethylene removal products, and

sanitizers. Ingredients used for post-harvest handling must be allowed under Section 205.601 and Section 205.602 of the National List.

Some materials are allowed for both post-harvest and processing use (e.g., citric acid). However, many materials are only allowed for a particular application. Any restriction on the use of a Brand Name Material List of registered product is listed in its annotation.

## The WSDA Brand Name Material List (BNML)



Through our Material Registration Program, WSDA Organic Food Program has evaluated the formulations of the products on the Brand Name Material List and determined that they comply with USDA organic regulations. Producers and handlers may use the products on this list and have confidence that their use will not negatively affect the status of their certification. The most up to date WSDA BNML can always be found at the Organic Food Program website: [www.agr.wa.gov/foodanimal/organic](http://www.agr.wa.gov/foodanimal/organic).

### **The WSDA does not endorse or guarantee any of the products listed on the BNML.**

Manufacturers are not required to register their products; therefore it is not a comprehensive list of materials that meet organic standards. Please refer to the National List of Allowed and Prohibited Substances for the complete list of generic substances that may be used in organic production. You are also encouraged to contact the WSDA Organic Food Program with questions regarding compliance with the USDA organic regulations.

### **Updates to the BNML**

The Brand Name Material List is updated regularly. As products are added as well as removed, it is important to always check the most up to date list on our website:

[www.agr.wa.gov/foodanimal/organic/materialslists.aspx](http://www.agr.wa.gov/foodanimal/organic/materialslists.aspx).

**WARNING!!** The National Organic Program does not regulate the use of the term Organic on fertilizer and pesticide labels. Products prohibited for use in organic production may contain the word “Organic” on their labels. Prior to using any substance in an organic operation, carefully evaluate the status of the material according to the USDA organic regulations and the current WSDA Brand Name Material List. Substances change periodically due to withdrawal from registration, reformulation, or company change. Use of an unapproved substance may result in a loss of organic certification for 36 months. Keeping your certifier informed of all materials that you plan on using *before you use them* will help to ensure compliance and help you avoid accidental application of a prohibited material.

## Organic Materials Review Institute (OMRI)



The Organic Materials Review Institute is another material review organization that offers an additional resource for materials that are approved for use in organic food production and handling. The OMRI Organic Products List is available at [www.omri.org](http://www.omri.org). OMRI also publishes a Generic Materials List that gives more information on a specific generic material and whether it can be used in an organic operation. Brand name products approved for organic production by OMRI may contain the “OMRI Listed” logo.

## **Environmental Protection Agency (EPA)**

The Environmental Protection Agency reviews pesticides for use in organic production. These products are labeled with the phrase “For Organic Production” and may include the logo to the right.



## **Five Steps to Organic Certification with WSDA**

### **Step 1: Develop an organic system plan**

Contact the WSDA Organic Food Program to request an application packet specific to your type of operation. The packet walks you through the process of completing the organic system plan. The organic system plan is the foundation of the organic certification process. Created by the operation seeking certification, it details how an operation will comply with the regulations based on its unique characteristics.

While plans differ based on operation type and needs, they address all practices of the operation’s systems such as tilling, grazing, harvesting, storing and transporting. They also specify approved substances used during the growing or handling process, monitoring practices for organic systems, recordkeeping systems, and barriers that prevent commingling with nonorganic products or contact with prohibited substances.

Complete the application packet, and submit fees that pertain to your business. Refer to the section titled “Tips for Completing your Application Packet,” and the instructions on the different forms to complete your application packet. If you have questions regarding the forms, or the fees associated with organic certification, please contact the WSDA Organic Food Program by calling (360) 902-1805 or emailing [organic@agr.wa.gov](mailto:organic@agr.wa.gov).

### **Step 2: Application review and approval**

Once you have developed and put into place the organic system plan, your plan and application packet will be evaluated for completeness and compliance with USDA organic regulations. You will be notified if additional information is necessary to complete the review of your application packet. If no additional information is needed, you will be notified that a complete packet has been received and your inspector will contact you to schedule an inspection.

### **Step 3: Organic inspection**

Every operation that applies for organic certification receives an on-site inspection. These comprehensive top-to-bottom inspections differ in scope depending on the farm or facility. For example, for crops they include inspection of fields, soil conditions, crop health, approaches to management of weeds and other crop pests, water systems, storage areas and equipment. For livestock, they include an inspection of feed production and purchase records, feed rations, animal living conditions, preventative health management practices (e.g., vaccinations), health records, and the number and condition of animals present on the farm. At a handling or processing facility, an inspector evaluates the receiving, processing, and storage areas used for organic ingredients and finished products.

An Organic Field Inspector will contact you to schedule an inspection of your business. Inspections are scheduled when the inspector can observe the practices used to produce or handle organic products and talk to someone knowledgeable about the operation. The inspector will evaluate your management

practices for organic crops and products, as well as your practices to protect organic crops and products from contamination. You will need to have all related records available for review at the inspection. Inspections vary in length, depending on the size and nature of your business.

#### **Step 4: Inspection report review**

After the inspection of your business has occurred, the inspector submits a report to the Olympia office and it is evaluated for compliance with the USDA organic regulations. The inspection report records whether you are following the Organic System Plan that was approved by the Olympia office, and if there are any areas of noncompliance with your practices and the production or handling of organic crops and products.

#### **Step 5: Certification status notification**

If the inspection verifies that your system is compliant with the USDA organic regulations, and any outstanding issues from the application review have been resolved, you will be issued an Organic Certificate. If areas of noncompliance were identified, the violation must be resolved prior to receiving organic certification. USDA organic regulations require that you update your plan as you modify practices that may affect organic integrity. An inspection will then be conducted at least once a year to maintain certification.

The certification process takes an average of 3.5 months for new applicants.  
Submit your application packet early in the season to accommodate the certification process.

## **WSDA Organic Program Fact Sheets and Contacts**

To learn more about organic requirements, visit the WSDA Organic Food Program website at [www.agr.wa.gov/FoodAnimal/Organic](http://www.agr.wa.gov/FoodAnimal/Organic) or call (360) 902-1805. Additional resources can be found on the National Organic Program website at [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)

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### **Recommended Fact Sheets**

- 9. Direct Marketing in Washington State
- 17. Eco-labels, Animal Welfare and Fair Trade Certifications
- 19. WSDA Food Processor License and Facilities

*For further information, to provide comments, or suggest a resource to add to this fact sheet, please email [smallfarms@agr.wa.gov](mailto:smallfarms@agr.wa.gov) or call (360) 902-2888.*