

# VOLUNTARY CERTIFICATIONS ORGANIC CERTIFICATION



The United States Department of Agriculture's (USDA) certified organic seal enables consumers to easily identify products that meet national standards and have been independently verified by an accredited third party. The organic sector today is an integral and growing part of food sales, reaching over \$45 billion in 2017. Some farms and food businesses choose to become certified organic as a way to differentiate their products in the marketplace and to communicate to their customers about their practices. In addition to marketing benefits, being certified organic also enables producers to access targeted programs that offer financial resources and technical support. Organic certification is voluntary, and producers may choose to certify all or part of their crops, livestock, or processed foods.



## This fact sheet includes information on:

- USDA's National Organic Program and Organic Regulations.
- Five steps to organic certification.
- Transitional certification.
- Exemptions to and exclusions from certification.
- Recordkeeping requirements for certified operations.
- Approved input materials for organic production.
- Organic labeling requirements.
- WSDA Organic Program technical assistance.

## USDA's National Organic Program and Organic Regulations

In 1990, the Organic Foods Production Act became law and established the USDA's National Organic Program (NOP) to develop national standards from a patchwork of independent certification programs. In 2002, the USDA organic regulations went into effect. All products sold, labeled, or represented in the United States as "organic" must comply with the specific requirements set by the USDA organic regulations.

The NOP accredits third-party certifiers to inspect and evaluate organic production and handling operations, and to certify businesses that meet the USDA organic regulations. Producers may become certified organic through any USDA-accredited certifier. In Washington State, the WSDA Organic Program certifies most of the organic crop and livestock producers, processors, handlers, and retailers.

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The WSDA Organic Program is an accredited third-party certifying agent. Please contact the WSDA Organic Program for additional information and assistance, [agr.wa.gov/departments/organic](http://agr.wa.gov/departments/organic) or [organic@agr.wa.gov](mailto:organic@agr.wa.gov) or 360-902-1805.

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## How is "organic" defined?

The National Organic Program explains, "Organic is a labeling term for food or other agricultural products that have been produced using cultural, biological, and mechanical practices that support the cycling of on-farm resources, promote ecological balance, and conserve biodiversity in accordance with the USDA organic regulations. This means that organic operations must maintain or enhance soil and water quality, while also conserving wetlands, woodlands, and wildlife. Synthetic fertilizers, sewage sludge, irradiation, and genetic engineering may not be used."

## Who can be certified organic?

Organic certification does not apply to only farmers and ranchers. In addition to crop and livestock producers, processors and most handlers of organic products must also be certified. Retailers may also be certified organic.

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 non-organic 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.

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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 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 composed of both organic and non-organic ingredients are subject to specific labeling restrictions on the use of the term “organic.”

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

In very general terms, to be certified organic, crop production must occur on sites that have been free from materials that are prohibited in the USDA organic regulations for at least three years, and must be managed without the use of prohibited materials such as GMO’s, ionizing radiation, and sewage sludge. Organic livestock production requires that animals be fed 100 percent 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 the Organic System Plan and that the operation’s production practices are compliant with USDA organic regulations.

### Can a farm grow certified organic crops if it also produces conventional crops?

Yes. Recordkeeping must clearly differentiate the organic and conventional activities of an operation. Adequate buffer zones must be in place to prevent unintended application (i.e. spray drift) of prohibited substances on all organic crops, and procedures must be in place to prevent commingling of organic and non-organic crops

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

General requirements for handlers and processors include development of an Organic System Plan and maintenance of detailed records to document that the operation’s practices comply with the USDA organic regulations. An annual inspection verifies

compliance. Organic products must be processed with only approved minor ingredients and processing aids found on the National List of Allowed and Prohibited Substances. A list of ingredients for all products must be provided. Product labels must be approved prior to obtaining organic certification. Procedures must be in place to ensure no commingling or misidentification occurs between organic and non-organic products, and no prohibited substances may come in contact with the organic products.

## Five Steps to Organic Certification

WSDA Organic Program outlines a five-step process to certification

### Step 1

#### Develop (or update) an Organic System Plan

The WSDA Organic Program application packet, available online or by contacting the program directly, outlines the process of submitting an Organic System Plan. Businesses should choose the appropriate packet for either producers or handlers.



The Organic System Plan is the foundation of the organic certification process, detailing an agreement between the producer, processor, or handler and the certifier about how their organic products are produced and handled in accordance with the USDA organic regulations. The Organic System Plan is created by the producer or handler and is unique to their specific context. However, all plans address practices from the product’s beginning to its final sale. For example, a crop producer system plan will include activities such as seed sourcing, planting, weed and pest management, and harvest. An Organic System Plan will also specify which approved substances expect to be used, how practices for organic systems will be monitored, recordkeeping systems, and plans to prevent commingling with non-organic products or contact with prohibited substances.

Certification must be renewed annually. WSDA Organic Program uses a “living” Organic System Plan, which means each operation only needs to complete a full Organic System Plan once. After initial certification is granted, operations may update their system plan at renewal, or any point throughout the year.

## Step 2

### Application review and approval

Once a producer or handler has developed and implemented their Organic System Plan, their plan and application packet is evaluated for completeness and compliance with USDA organic regulations. Applicants are contacted if additional information is needed. If no additional information is needed, they are notified that a complete packet has been received and an inspector will contact the producer, handler, or processor to schedule an inspection.

## Step 3

### Organic inspection

Every producer, handler, or processor that applies for organic certification receives an on-site inspection. The purpose of the inspection is to verify that practices in use are consistent with the operation's Organic System Plan.

For example, for crops it includes inspection of fields, soil conditions, crop health, weed and pest management plans, water systems, production and sales records, storage areas and equipment. For livestock, it includes 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 ingredient records and product formulations, flow charts and receiving, processing, and storage areas used for organic ingredients and finished products. Inspections are conducted at least once a year to maintain certification.

## Step 4

### Inspection report review

After inspection, the inspector submits their findings for review by WSDA Organic Program's review team. The inspection report records whether the producer or handler is following the Organic System Plan that was approved by the Organic Program, and if there are any areas of concern or noncompliant practices that need to be addressed.



## Step 5

### Certification status notification

If the report review verifies that the Organic System Plan is compliant with the USDA organic regulations, and any outstanding issues from the application review have been resolved, then an Organic Certificate is issued.

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### How long does Organic Certification take?

The certification process can take several months, so applying early is recommended. WSDA Organic Program must receive new site applications at least 3 ½ months before harvest of the first crop. Crops cannot be certified organic after they have been harvested.

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### How much does it cost?

Certification cost varies, depending on how the certifier structures its fees, and the type of certification services requested. Some certifiers charge by acre, while others use income from organic products to calculate fees. When it is included in the Farm Bill, USDA offers a cost-share program that can reimburse producers 75 percent of organic certification fees, up to \$750 per scope of certification.

### Transitional Certification

In terms of organic certification, "transition" describes the time period beginning twelve months after the last application of a prohibited material and ending when the land becomes eligible for organic status. USDA organic regulations 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.

The WSDA Organic Program offers crop and livestock producers "Transitional Certification" that can be used to market products while the operation moves towards organic certification. Products certified as "transitional" must meet the same production and handling requirements as an organically certified product. The key difference is that the land must have no applications of prohibited materials for one year prior to harvest, rather than the three years required for organic certification.

Producers who go through the transitional certification process benefit by developing a complete understanding of the recordkeeping, auditing,

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and inspection processes required for organic certification, preparing themselves for compliant organic management. Farms that apply for transitional certification also minimize their risk by having their input material list reviewed for compliance with USDA organic regulations. This helps avoid the potentially costly mistake of applying a prohibited material, which resets the transition clock back. A transitional certificate also opens the door to financial and technical support from the USDA Natural Resources Conservation Service (NRCS). In addition to marketing and technical assistance benefits, producers with transitional certification are granted an organic certificate when the land completes its three-year transition.

The application for transitional certification is the same as the one for organic certification and available on the Organic Program pages of the WSDA website.

### Exemptions to and Exclusions from Certification

USDA organic regulations exempt producers, handlers, and processors with less than \$5,000 in gross annual organic sales and allow them to represent and sell their products as organic without being certified. Once the producer's, handler's, or processor's gross organic sales reach \$5,000, products must be certified organic to be represented as organic. Specific recordkeeping and labeling requirements still apply when meeting these exemptions and exclusions. It is important to work with the WSDA Organic Program or other accredited certifier to ensure products are represented and labeled correctly.

Even if exempt from organic certification, these producers, handlers, and processors must still comply with all USDA organic regulations and are subject to inspections by USDA or its representatives. This includes not using any prohibited materials and preventing commingling with any non-organic products while being stored, packed, transported, and/or displayed for sale. Exempt operations must maintain records for a period no less than three years beyond their creation, and records must be sufficient to prove that products identified as organic were organically produced, handled, or processed and verify quantities produced from such ingredients. Maintaining financial records is especially important in case a question arises about qualifying for the exemption.

### 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 fully disclose all activities and transactions in sufficient detail as to be readily understood and audited, and must be:

- Adapted to the particular organic business.
- Maintained for a period of at least 5 years beyond their creation.
- Sufficient to demonstrate compliance.
- Made available during an inspection.

An audit of 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.

Specific records vary by type of operation. For example, crop producers maintain records for production sites that include material applications, cropping or land use history; lease agreements and maps. Additional records include invoices, organic certificates, and receipts for seeds, planting stock, and all material inputs, production and harvest records such as planting, cultivation, production yields, shipping documents, and sales records. Organic livestock operations maintain records such as organic certificates and invoices for all feed, animal medical treatment records, animal sale or purchase records, and sales records. Organic processors and handlers must maintain records that document the amount of product received and information detailing the organic status or compliance of an incoming product, the handling and processing of organic products, as well as sales and shipping records.

WSDA Organic Program or another accredited organic certifier can provide guidance on the specific records that should be kept for a given operation. Recordkeeping templates are available on the USDA NOP website.

## Approved Input Materials for Organic Production

In order to comply with USDA organic regulations, producers, processors, and handlers must only use input materials that are in compliance with these regulations. This means that for a substance to be used in or on organic crops, products, or sites, both the active ingredients, as well as any inert or minor ingredients, must fully comply with USDA organic regulations. The “National List of Allowed and Prohibited Substances” specifies the substances that are allowed and prohibited for use in organic production and handling. It is codified in Sections 205.601-205.606 of the USDA organic regulations.

To help producers and handlers comply, the WSDA Organic Program reviews materials and publishes the “Organic Input Material List” on the WSDA website. Additionally, the Organic Materials Review Institute (OMRI) maintains an “OMRI Products List.” These lists and where to find them online are described in detail below.

### Crop production

The USDA organic regulations allow the use of all natural input materials unless they are specifically prohibited. (For example, strychnine and nicotine are prohibited.) Synthetic input materials 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 input materials 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 pre-harvest 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

Approved and prohibited input materials for use in organic livestock production can be found in the USDA organic regulations, Section 205.603 and 205.604. These input material lists include requirements around feed additives, vaccines and biologics, medications, and any other production aid used in an organic livestock system. Natural input materials 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 an input material in livestock production, evaluate the material carefully and verify there are no synthetic binders, colors, or artificial flavors in the product.

### Processing aids and post-harvest materials

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

A *processing aid* is an input material 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 input materials 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 input material, structure, or device that is used in the post-harvest handling of agricultural products. Post-harvest input materials may be 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.

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Some input materials are allowed for both post-harvest and processing use (e.g., citric acid). However, many materials are only allowed for a particular application.

### The WSDA Organic Input Material List

The WSDA Organic Program manages an Organic Input Material Registration Program that evaluates the formulations of products submitted by manufacturers and publishes an online “Organic Input Material List” with materials determined to be in compliance 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. This is a dynamic list, and producers should check the most recent information on the WSDA Organic Program website.



### Updates to the “Organic Input Material List”

The Organic Input Material List is updated regularly. Products are added as well as removed, so it is important to always check the most up-to-date list online. Find it by searching “Organic Input Material List” on the WSDA website, [agr.wa.gov](http://agr.wa.gov)

### WSDA does not endorse or guarantee any of the products listed.

Manufacturers are not required to register their products; therefore, it is not a comprehensive list of input 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. Producers and handlers are encouraged to contact the WSDA Organic Program with questions regarding compliance with the USDA organic regulations.



**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 Organic Input 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 [omri.org/omri-lists](http://omri.org/omri-lists). 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.”



## Organic Labeling Requirements

“Certified organic” is a regulated labeling term, and the labeling standards are very precise. Only products that have been certified as meeting the USDA’s requirements for organic production and handling may carry the USDA organic seal. Exempt operations may make an organic claim, but are not allowed to use the USDA organic seal or a “certified” claim. The WSDA Organic Program reviews product labels to ensure the label and product is compliant with USDA organic regulations.

In general, the rules for labeling processed products packaged for individual retail sale depends on the percentage of certified organic ingredients used.

**100% Organic.** This claim applies only to products made entirely of 100% organic ingredients and processing aids. The product label identifies all organic ingredients as “organic” on the ingredient statement. These product labels must state the name of the certifier on the information panel (e.g., “Certified Organic by Washington State Department of Agriculture”). The use of the USDA and certifier’s organic seals are optional.

**Organic.** This claim applies when the product is made with at least 95 percent organic ingredients. Non-organic ingredients that are allowed per the National List may be used, up to a combined total of 5 percent of non-organic content (excluding salt and water). Product labels must state the name of the certifier on the information panel. The use of the USDA and certifier’s organic seals are optional.

**“Made with” Organic.** This claim applies when the product is made with at least 70 percent certified organic ingredients (excluding salt and water). All certified organic ingredients must be identified as organic on the ingredient panel. Non-organic ingredients must not be produced using prohibited practices (e.g., genetic modification, sewage sludge, ionizing radiation). Product labels may state “made with organic (insert up to three ingredients or ingredient categories).” They are not allowed to include the USDA organic seal anywhere, represent the finished product as organic, or state “made with organic ingredients.” The name of the certifier must be included on the information panel. The use of the certifier’s organic seal is optional.

## Specific Organic Ingredients in Information Panel

**Only.** Multi-ingredient products with less than 70 percent certified organic content (excluding salt and water) don’t need to be certified. These products may only list certified organic ingredients as organic in the ingredient list and the percentage of organic ingredients. Remaining ingredients are not required to follow the USDA organic regulations. These labels must not include the USDA organic seal anywhere or the word “organic” on the principal display panel.

## Organic labeling for bulk and non-retail containers

The USDA organic regulations outline the requirements for labeling of non-packaged products sold at retail stores (e.g. bulk products), as well as labeling of products that are produced at operations that are exempt or excluded from certification. The WSDA Organic Program or another accredited certifier can provide guidance on the requirements.

Any container used only for non-retail purposes (e.g., shipping or storage) of an organic agricultural product must also be labeled. This is so that the container can be traceable to an organic product and lot number, if applicable. These non-retail containers may be labeled with the term “organic,” any special handling instructions to preserve the product’s organic integrity, the USDA and certifier’s organic seals, and the statement “Certified by Washington State Department of Agriculture” or other certifier as appropriate.

## Organic labeling for alcoholic beverages, textiles, and body care products

While the USDA regulates the term “organic” as it applies to agricultural products, additional labeling requirements may apply to certain products such as alcoholic beverages, textiles, and body care products. It is important to work with the WSDA Organic Program or other accredited certifier to ensure products are labeled correctly.

The USDA Agricultural Marketing Service (AMS) has a webpage on Organic Labeling, has several additional resources, including the “Labeling Organic Products Fact Sheet,” “Organic Textile Policy,” “Organic Cosmetics Fact Sheet,” and a “Labeling Training Module.” Find the page by searching for “organic labeling” at [ams.usda.gov](https://ams.usda.gov).

### **WSDA Organic Program Technical**

**Assistance.** The WSDA Organic Program provides technical assistance to all clients and has a wealth of free information online. Search for “Organic Program” on the WSDA website, [agr.wa.gov](http://agr.wa.gov). Producers and handlers can also contact the WSDA Organic Program at 360-902-1805 or email [organic@agr.wa.gov](mailto:organic@agr.wa.gov).

Information on the WSDA Organic Program webpages is designed for new applicants as well as the experienced organic farm, processor, or handler. It includes brochures, fact sheets, videos, links to rules and regulations, compliance guides, recordkeeping forms, and new and renewal application forms. Most webpages are available in Spanish. Search for these resources by name:

- Interested in Organic Certification
  - Sound and Sensible Organic Certification Video Series
  - List of Certified Producers
  - Resources for Crop and Livestock Producers
  - Resources for Processors and other Handlers
  - Organic System Plans
  - Materials Lists
  - International Markets information
  - National Organic Program Guide to Organic Certification
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### **Additional Resources**

Extensive resources in English and Spanish can also be found at:

- The National Organic Program website, [ams.usda.gov/nop](http://ams.usda.gov/nop)
- The ATTRA Sustainable Agriculture Program website, [attra.ncat.org/organic](http://attra.ncat.org/organic)

The USDA Agricultural Marketing Service has developed a set of bilingual tools to help farmers decide if organic certification is a good fit for them. Search for “Organic, Self-Assessment Video” at [ams.usda.gov](http://ams.usda.gov)



- 11. Direct Marketing in Washington State
- 21. Eco-labels, Animal Welfare, and Fair Trade Certifications
- 23. WSDA Food Processor License and Facilities