

# Are We Organic Yet!?

## **NOP Compliance for Non-certified Organic Growers**

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**Kerr Center for Sustainable Agriculture**

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# The Small Farm Exemption

- §205.101(a) exempts producers selling less than \$5,000 of organic produce annually from certification







Is It Organic  
...or Not??

# Organic Food Production Act of 1990

***§6505(d) Provides an exemption to certification for the “Small Farmer.” For the purposes of this legislation, a small farmer is one who sells no more than \$5,000 of agricultural products annually.***

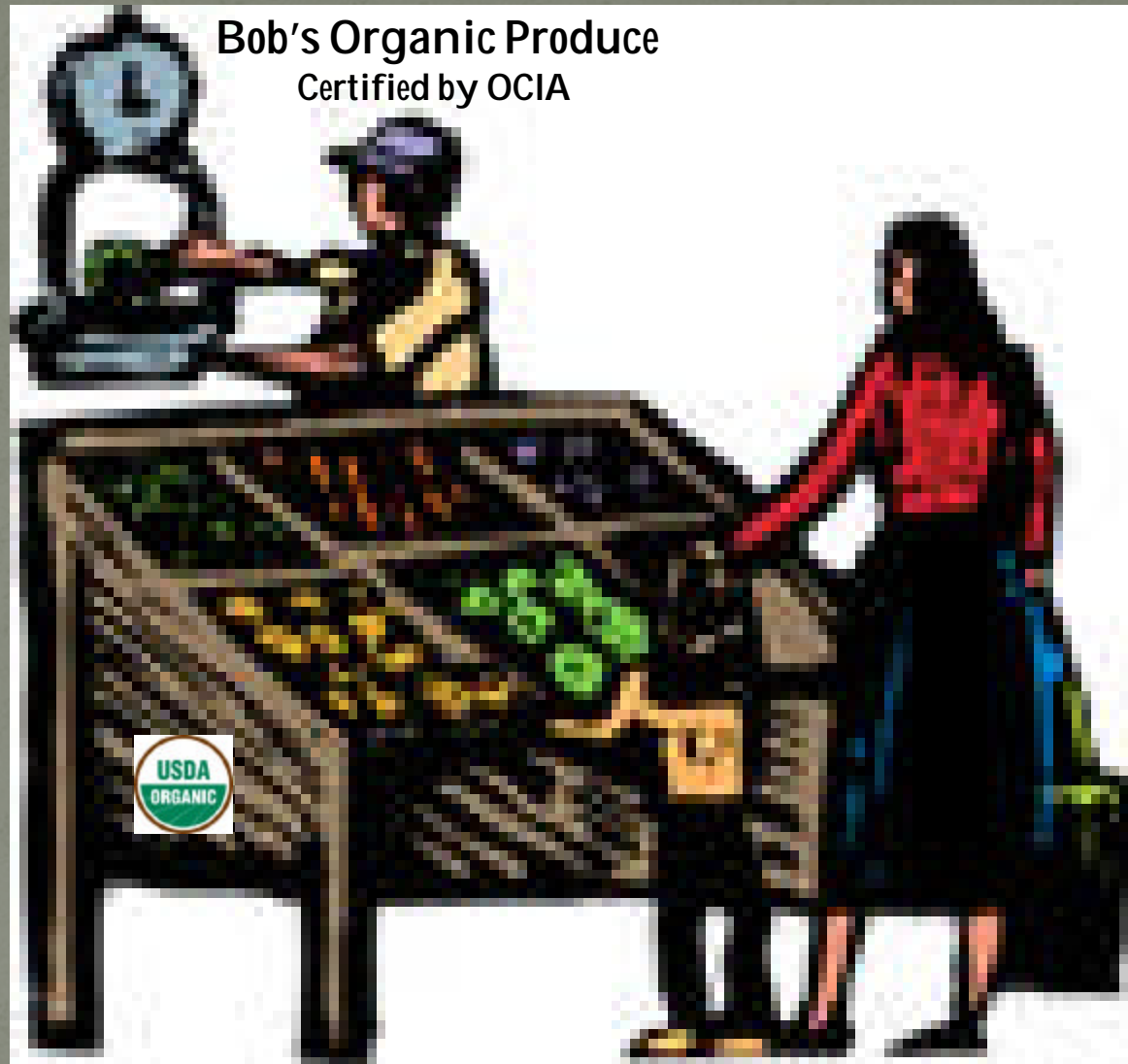
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# Small Scale Organics:

A Guidebook for the Non-certified Organic Grower  
*(Includes Guidelines and an Organic System Plan)*





Recognizing Certified Operations: See p. 3



# 3-Year Transition for Conventionally-Farmed Land



Land/Site Requirements: See p. 4

## Soil & Soil Fertility Benefits

*N self-sufficiency*

*Access to native fertility*

*Nutrient banking*

*Nutrient bioavailability*

*Reduced erosion*

*Reduced leaching*

*Soil water retention*

*Nutrient cycling*

*Better tilth*

## Pest Management Benefits

*Innate resistance/tolerance*

*Induced resistance/tolerance*

*Disease suppression in the soil*

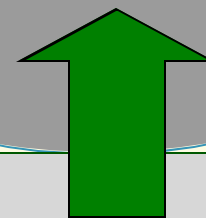
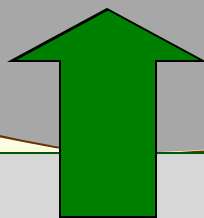
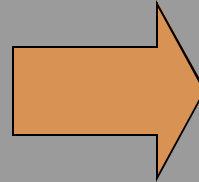
*Biocontrol above ground*

*Pest life-cycle disruption*

*Weed seedbank reduction*

*Shift in weed populations*

*Ease of cultivation for weed control*







# HOW TO EVALUATE A FERTILIZER LABEL

**Debbie's Organic Fertilizer Blends**

**3-2-3**

Guaranteed Minimum Analysis

TOTAL NITROGEN (N).....	3.0%
1.0% Water Soluble Nitrogen	
2.0% Water Insoluble Nitrogen	
AVAILABLE PHOSPHATE (P <sub>2</sub> O <sub>5</sub> ).....	2.0%
SOLUBLE POTASH (K <sub>2</sub> O).....	3.0%

Derived From: Composted broiler litter, feather meal,  
natural sulfate of potash, granite dust

NET WEIGHT: 50 lbs. (22.68 Kgs)

Manufactured by Debbie's Organic Enterprises, Weasel Rd., Sapulpa, OK 74000,  
Tel: 000-000-0000

## Review Logos (Optional)

Indicate these organizations reviewed this product and consider it acceptable for organic use.

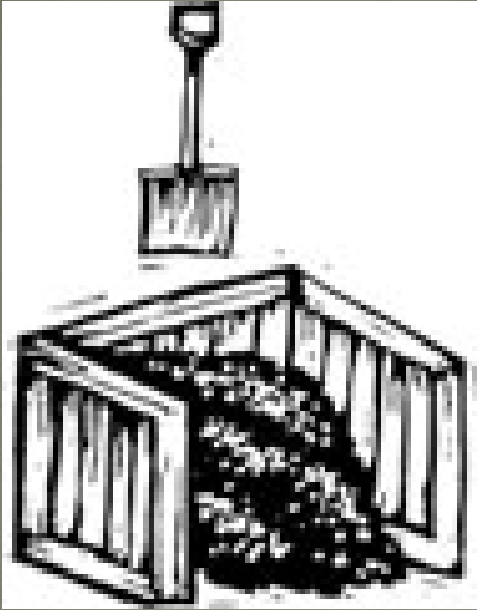
## Fertilizer Analysis

These numbers indicate the minimum percentage of nitrogen, phosphate, and potash, respectively. Most organic fertilizers have analyses much lower than conventional fertilizers. However, this information does not indicate whether the product is acceptable for organic use.

## Source Statement

Tells you what ingredients were used to formulate the fertilizer. READ THIS TO DETERMINE WHETHER THE PRODUCT CONTAINS ANY PROHIBITED MATERIALS.





# Use of Animal Manures

??205.203(c)(1)–205.203(c)(2)

## *Options:*

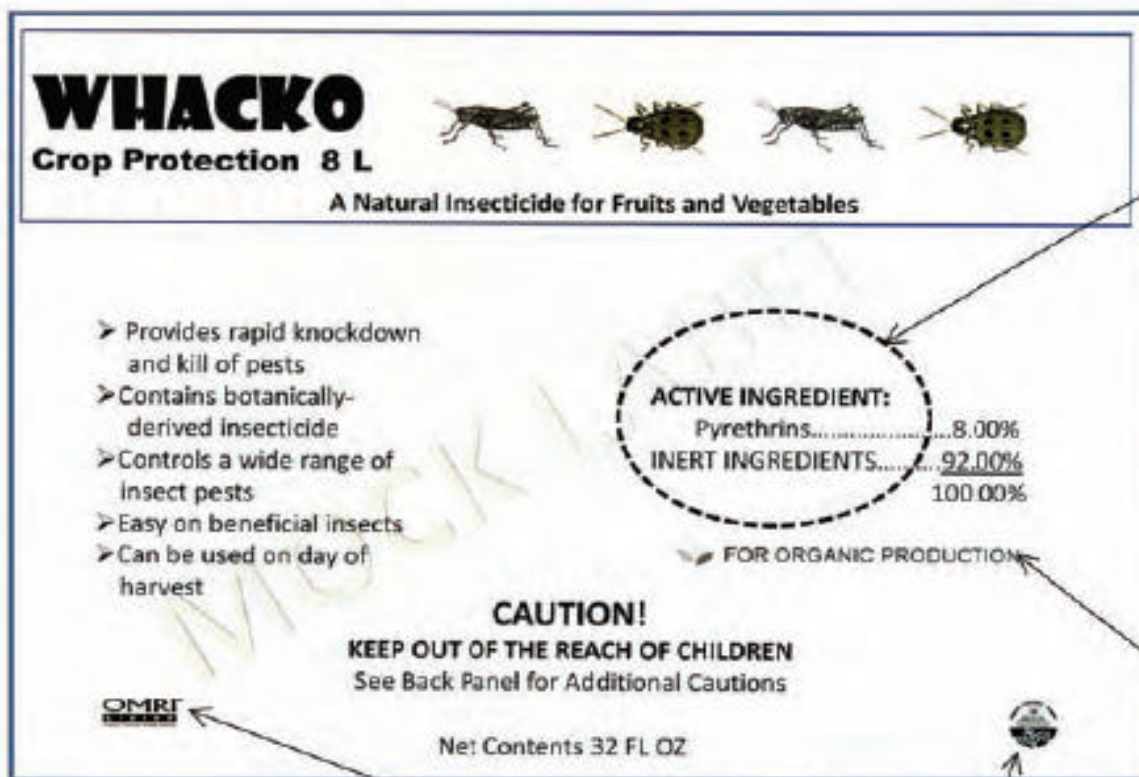
- **Apply to nonfood crops.**
- **Compost before use.**
- **Apply 120 days or more before harvest of crops with edible portions in contact with the soil.**
- **Apply 90 days or more before harvest of crops with edible portions not in contact with the soil.**



Manure & Compost: See p. 8



# HOW TO EVALUATE THE FRONT PANEL OF A PESTICIDE LABEL



## Active Ingredient Statement

Tells you what ingredients were used to formulate the product. **READ THIS TO DETERMINE WHETHER THE PRODUCT CONTAINS PROHIBITED INGREDIENTS.**

## EPA Organic Label Optional

Indicates EPA approves this product for organic use

## Review Logos (Optional)

Indicate these organizations reviewed this product and consider it acceptable for organic use.

# Seed And Planting Stock

- Organic seed and planting stock must be used
- If not commercially available, untreated seed or planting stock may be used; no GMOs
- Conventional seed treatments are prohibited, unless required by Federal or State regulations
- Organic transplants must be used





# Ensuring Organic Integrity



Graphic from Four Winds Farm, River Falls, Wisconsin

Organic Integrity: See p. 12

# Marketing

- **Do not sell anything as organic if it's not..**
- **Do not say it's certified if it's not...**
- **Do not use or display the USDA Organic Seal if you're not certified.**



Marketing: See p. 13



# Special Products

- **Transplants for Sale**
- **Sprouts**
- **Wild-harvest**
- **Processed Foods**  
e.g. jams, jellies,  
breads



Special Products: See p. 15

(Version 1.0)

**ORGANIC SYSTEM PLAN (OSP) & DECLARATION  
FOR NON-CERTIFIED SMALL FARMS**

Year to Which this Plan Applies \_\_\_\_\_

**Identification**

Name \_\_\_\_\_ Farm/Garden Name \_\_\_\_\_

Mailing Address \_\_\_\_\_

Physical Address (if different than mailing address)  
\_\_\_\_\_

Phone \_\_\_\_\_ Cell \_\_\_\_\_

Email \_\_\_\_\_ Fax \_\_\_\_\_

**General Information**

- All my organic production will be done at the physical address shown above.  
 I will grow my organic crops at the following location(s).

- I will sell less than \$5,000 of organic products in this calendar year.

**IF YOUR SALES WILL EXCEED \$5,000, YOU MUST APPLY FOR CERTIFICATION.**

- The land from which I will harvest my for-sale organic products has had no applications of prohibited fertilizers, pesticides, or other materials in the 36 months prior to harvest.

The products I expect to sell as organic within the calendar year include:

- Produce, herbs and/or cut flowers
- Plants and/or transplants
- Edible sprouts
- Processed products (flour, jams, jellies, syrups, breads, cakes, etc.)
- Other If "other," please describe:

**Organic Practices**

I use or will use the following organic practices to build soil fertility, control insect pests and diseases, suppress weeds, prevent erosion, and support biodiversity in and around my organic field(s).

- Rotate crops
- Companion plant
- Plant cover crops
- Plow in green manure crops
- Mulch
- Sticky traps/mechanical traps
- Barriers/screens/plant collars/row covers
- Prune/remove diseased or infested plants
- Till/cultivate/hoe/hand-weed
- Mow/scythe/weed trim
- Bat/bird houses
- Beneficial insect habitats
- Release beneficial insects
- Bee hives/orchard bees
- Moon signs

**Fertilizers and Soil Amendments**

I will NOT be using, nor have I used in the past 3 years, any of these or other prohibited fertilizers or amendments in my organic production:

- Conventional fertilizers including urea (45-0-0), ammonium nitrate (33.5-0-0), ammonium sulfate (21-0-0), calcium nitrate (15-0-0), superphosphate (0-20-0), triple superphosphate (0-44-0), diammonium phosphate (18-46-0), phosphoric acid (52-0-0), potassium nitrate (13-0-46), potassium chloride (0-0-60). These are commonly formulated as granular materials.
- Dry blends of these materials such as 10-10-10, 13-13-13, 18-24-6, 29-2-5, or 10-20-10, or liquid formulations of these fertilizers (e.g., 3-18-18, 9-40-9)
- Dry soluble chemical fertilizers.
- Synthetic slow-release fertilizers.
- Fertilizers made from biosolids, sewage sludge, or other human waste products.
- Prohibited liquid soil conditioners.





# Reporting Violations

- \$10,000 per violation
- [www.ams.usda.gov/NOP/Compliance/FileCompliant.html](http://www.ams.usda.gov/NOP/Compliance/FileCompliant.html)



Reporting Violations: See p. 17



# Uses

- Self-assessment by growers
- Grower & Consumer Education
- Managing the Marketplace





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<http://www.kerrcenter.com/publications/small-scale-organics.pdf>





Thanks  
for your  
attention!



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