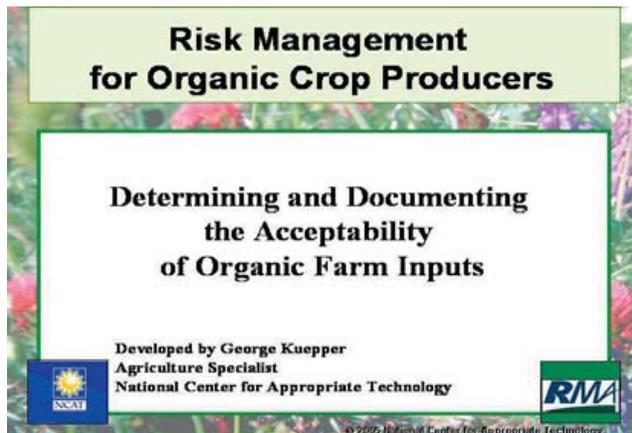




# DETERMINING AND DOCUMENTING THE ACCEPTABILITY OF ORGANIC FARM INPUTS

## WORKSHOP HANDOUT

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This presentation is part of a brief series of modules on risk management for organic producers. It was produced in 2005 by the National Center for Appropriate Technology, with funding from the USDA's Risk Management Agency.



In spring 2005, the USDA's Risk Management Agency funded a survey of organic inspectors to identify the high-risk areas for organic producers. The survey, conducted by the Independent Organic Inspectors Association, identified five high-risk areas that both novice and experienced producers had in common. One of those risk areas involves finding allowed inputs for organic production and proving their acceptability to the certifying agent. This is the topic of this presentation.

**RISK AREA:**

Determining and Documenting the Acceptability of Organic Farm Inputs

**Intentional or accidental application of a prohibited substance decertifies the treated land for 36 months!!**

3

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Knowing what is allowed and prohibited in organic production is critical. The intentional or accidental use of a prohibited fertilizer, pesticide, or other input can decertify the affected land for 36 months. For those organic producers who rely on price premiums to make a profit, this loss can be devastating.

**Rule of Thumb #1**

- If it is natural (nonsynthetic), assume that it is **ALLOWED** in organic crop production **UNLESS** it is specifically prohibited and placed on the National List under §205.602

4

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There are a few rules of thumb when it comes to understanding what is and is not allowed in organic production. The first is that if something is truly natural—such as animal manure, plant materials, animal by-products, natural rock powders—it is allowed **UNLESS** it is specifically prohibited. Natural or nonsynthetic materials that are prohibited are found in a special section of the National List—Section 205.602—*Nonsynthetic substances prohibited for use in organic crop production*.

**Rule of Thumb #2**

- All synthetic products (fertilizers, amendments, pesticides, growth regulators, etc.) are **PROHIBITED**, **UNLESS** specifically allowed and placed on the National List under §205.601

5

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The second rule of thumb is that anything synthetic—such as most commercial fertilizers and pesticides—is prohibited, **UNLESS** it is specifically allowed and placed on the National List under §205.601, *Synthetic substances allowed for use in organic crop production*.

## What is a Natural or Nonsynthetic Substance?

- **A substance that is naturally occurring in a plant, animal, or mineral form (includes crop residues, seed meals, manures, bone meal, ag-lime, rock powders, etc.)**
- **Also: Any substance created by naturally occurring biological processes (e.g., vinegar, *Bacillus thuringiensis* toxin)**

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So what is natural and what is synthetic? It is not always clear. The National Organic Standards Board (also called the NOSB), which has the responsibility for determining what goes on the National List, considers natural or non-synthetic substances as those that are naturally occurring and those that are created by naturally occurring processes, like fermentation.

## What is a Synthetic Substance?

- **Any substance that is formulated or manufactured by a chemical process (e.g., anhydrous ammonia, 2,4-D, glyphosate/Roundup™, carbamate insecticides, etc.)**
- **Also: any natural substance that has been chemically changed (e.g., superphosphate, which is derived by treating natural rock phosphate with acids)**

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The NOSB considers synthetic substances to be those that are formulated or manufactured by a chemical process. Also, any natural substance that has been chemically changed is considered synthetic.

## Prohibited Natural Crop Production Inputs

- **Biosolids (i.e., sewage sludge) — §205.105(g)**
- **Prohibited under §205.602:**
  - Ash from manure burning
  - Arsenic
  - Lead salts
  - Sodium fluoaluminate
  - Strychnine
  - Tobacco dust
  - Potassium chloride (restricted use)
  - Sodium nitrate (restricted use)

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Natural or nonsynthetic materials that are specifically prohibited are:

- 1) Biosolids or sewage sludge. Because the public was so adamant that biosolids not be used in organic crop production, it is accorded special treatment within the regulation, separate from the other National List items. Biosolids are specifically prohibited under Section 205.105(g).
- 2) Those natural substances prohibited on the National List are ash from manure burning, arsenic, lead salts, sodium fluoaluminate (aka cryolite), strychnine, tobacco dust, potassium chloride, and sodium nitrate. The last two items, potassium chloride and sodium nitrate, are restricted in their use. Annotations in the National List explain just what the restrictions are for each of these materials.

## Prohibited Natural Crop Production Inputs

- **Contaminated organic materials**  
Examples include:
  - leather meal (heavy metal chromium)
  - conventional cottonseed meal (pesticides)
  - broiler chicken litter (*if* arsenic contaminated)
- **Genetically engineered bio-pesticides, inoculants, and other GE-derived products**

But nothing is ever as simple as it appears. There are additional reasons why a nonsynthetic material might be prohibited in organic production. One of the major reasons is contamination. Organic producers may not use any inputs that will contaminate their crops with prohibited substances, heavy metals, or human pathogens. Some examples of substances that are often prohibited due to contamination:

- 1) **Leathermeal.** Leathermeal is a by-product of the tanning industry. Unfortunately, during processing, it acquires a load of toxic chromium and is almost universally prohibited by certifiers.

- 2) **Conventional cottonseed meal.** Because conventional cotton is heavily sprayed, many certifiers are reluctant to allow the use of cottonseed meal unless it is from organic cotton.
- 3) **Broiler chicken litter.** Some commercial chicken producers feed arsenic to control parasites and increase appetite. Fortunately for consumers, the arsenic is excreted in the manure. Certifiers may require that litter from commercial sources be tested to determine the level of arsenic present. If deemed excessive, it might be prohibited or restricted.

Technically, the National Standard refers to genetic engineering as an “excluded method” under Section 205.105 (e) of the Regulation. Therefore, if an otherwise natural product is genetically modified, it is prohibited in organic production. Genetically engineered biopesticides, inoculants, and crops are prohibited outright. Also some by-products such as corn-gluten meal and other plant by-products might also be prohibited, depending on the certifier’s policy. Decisions on such by-products usually depend on whether it is likely that the genetically engineered character of the product will continue to express itself and either contaminate the crop or cause harm to the soil food web. One typical example is the Bt toxin in genetically engineered corn by-products.

## The Organic Input Minefield — Where It’s VERY Easy to Make Mistakes

- **Fertility products labeled “Organic”**
- **Synthetic micronutrients**
- **Potassium chloride**
- **Liquid fish and seaweed extract products**
- **Products (especially pesticides) with inerts**

There are several products and issues in organic inputs that are particularly vexing. For example, individual states and the American Association of Plant Food Control Officers (AAPFCO) allow fertilizer and amendment labels that say “organic” but are not compliant with the National Organic Standard. This label indicates only that the material is carbon-based. Therefore, sewage sludge can bear a fertilizer label that says “organic.” Organic producers must understand that they cannot trust such labeling when choosing fertilizers and amendments.

Synthetic micronutrients (except for nitrates and chlorides) are allowed in organic crop production if the producer has soil or tissue tests that indicate the need. Unfortunately, most state fertilizer laws have loopholes that allow the sale of toxic wastes as fertilizer if they contain crop nutrients. The recycling of steel from automobiles, for example, can produce a by-product high in zinc—an essential crop nutrient. However, it may also contain large amounts of toxic chromium, lead, and dioxin.

Potassium chloride, as mentioned earlier, has some restricted use in organic production. The annotation in the National List indicates it can be used only if it is from a natural, mined source and chloride does not accumulate in the soil. Organic producers should understand that the natural mined potassium chloride is a specialty fertilizer and is not the same as prohibited potash products found in local farm and garden supply stores.

## Help in Sorting through Materials

- **Read the Regulations:**  
[www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)
  - §205.203 Fertility & Nutrient Mgt. Standard
  - §205.206 Pest Mgt. Standard
  - §205.601 Nat'l List—Synthetics Allowed
  - §205.602 Nat'l List—Nonsynthetics Prohibited

11

Working through the materials minefield can be a nightmare. And needless to say, we have not covered all the issues in this presentation, only some of the more compelling ones. Fortunately, there are some guides you can use.

Like it or not, you should start by reading the pertinent parts of the Regulation. This is the law, and everyone dealing with organic production and marketing must adhere to it. If you are dealing with a generic substance, such as an agricultural by-product or waste material, it might be all the information you need. Most of the time, however, when dealing with commercial products, additional assistance is needed.

## Help in Sorting through Materials

- **OMRI Listing**  
[www.omri.org](http://www.omri.org)
  - **WSDA Brand Name Materials List**  
<http://agr.wa.gov/FoodAnimal/Organic/MaterialsLists.htm>
  - **U.S. EPA Pesticide Labeling**  
[www.epa.gov/opppnsd1/PR\\_Notices/pr2003-1.pdf](http://www.epa.gov/opppnsd1/PR_Notices/pr2003-1.pdf)
-  FOR ORGANIC PRODUCTION

12

One of the best strategies is to determine whether a product is “OMRI Listed.” OMRI—the Organic Materials Review Institute—is a non-profit organization that reviews products for use in organic production. Its seal is an excellent indicator that a product is allowed in organic production. Most OMRI Listed products are so-labeled, but you can also check the updated list on the OMRI Web site. The one drawback to OMRI Listing is that it is fee-based and is only used by companies that choose to pay for the service. There are many acceptable products in the marketplace that have not been reviewed by OMRI.

A similar handicap exists with product lists developed by certification agencies. A number of certifiers develop their own lists of acceptable commercial products. Such lists will not include all acceptable products, and they are usually

focused on the specific region the agency services. The Washington State Department of Agriculture has a large and very helpful list. It is one of the few certifiers (perhaps the only one) that publishes its list on the Web.

One of the most reliable indicators that a pesticide product is allowed is EPA labeling for organic production. If you see this label on a pesticide container, you can use it with full confidence that you are compliant with the National Standard. This is a voluntary program, unfortunately, so all acceptable pesticide products do not automatically bear this seal. Also, it applies only to pesticides, not to fertilizers or other inputs.

## Help in Sorting through Materials

- Established, multi-product organic farm and garden supply store catalogs.  
Examples:
  - Seven Springs Farm Supply  
[www.7springsfarm.com/catalog.html#Orgcertinfo](http://www.7springsfarm.com/catalog.html#Orgcertinfo)
  - Peaceful Valley Farm Supply  
[www.groworganic.com](http://www.groworganic.com)
- To be sure materials are allowed:  
**•CONSULT YOUR CERTIFIER•**

13

Another source of help are catalogs from some of the more reputable and experienced multi-brand supply companies. For example, Seven Springs and Peaceful Valley not only indicate OMRI-Listed products but also use designations like *Nat'l List* or *Meets NOP*, to highlight products they believe meet the requirements of the National Standard.

While all these resources are helpful, bear in mind that, with the exception of EPA labeling “For Organic Production,” they are only guides. Your certifier has the final word on whether or not a product is allowed. When in any doubt about the acceptability of an input, always CONSULT YOUR CERTIFIER.

## Documents You **Need** to Save

- **Product labels**
- **Purchase receipts**
- **Lab analyses of products**
  - may be required by certifier for some inputs
- **Soil or tissue tests when synthetic micronutrients are applied**
- **Any additional verification of allowability**
  - labels, material safety data sheets, or communications from manufacturers stating product ingredients

14

Finding allowed products is just the first step. You will need to ensure that you have all the documentation that proves to your certifier that you are using only allowed materials. Be certain to retain all product labels and copies of any lab analyses, especially if they were specifically required by the certifier. If you are using synthetic micronutrients, be sure to retain the soil or tissue test results that justify their use. Hold on to any document that indicates the allowability of a product, especially labels, material safety data sheets, and letters from manufacturers. Keep your purchase receipts for all inputs.

## Be **Sure** to Record

- **Where products are used (i.e., which crops and fields)**
- **Rates or amounts applied**
- **Application dates**
- **Target pests, when pesticides are used**

**See ATTRA's Documentation Forms**

15

Be sure to record where products are used, the rates and amounts applied, dates they were applied, and note the pest you were targeting if you use a pesticide.

## Helpful Record-Keeping Tools

- **Organic Field Crops Documentation Forms**
  - [www.attra.ncat.org/attra-pub/cropforms.html](http://www.attra.ncat.org/attra-pub/cropforms.html)
- **Organic Livestock Documentation Forms**
  - [www.attra.ncat.org/attra-pub/livestockforms.html](http://www.attra.ncat.org/attra-pub/livestockforms.html)
- **Organic Orchard, Vineyard, and Berry Crop Documentation Forms**
  - [www.attra.ncat.org/attra-pub/orchardforms.html](http://www.attra.ncat.org/attra-pub/orchardforms.html)
- **Recordkeeping and Budgeting Workbook for Organic Crop Producers**
  - [www.attra.ncat.org/attra-pub/organiccropforms.html](http://www.attra.ncat.org/attra-pub/organiccropforms.html)

16

ATTRA has published a number of useful tools that can aid in documenting inputs and activities on the organic farm. These are available on the Web site, or you can get a print copy by calling 1-800-346-9140.

## How to Avoid Confusion about Materials??

**REDUCE  
YOUR USE OF  
COMMERCIAL INPUTS**

17

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Since finding allowed inputs is challenging, and the consequences of using prohibited substances are great, it is in the farmer's interest to reduce dependence on off-farm inputs as much as possible. Fortunately, organic farming is designed to do just that.

## Organic Management is...

**A systems-based  
approach to farming  
that reduces the need for  
off-farm inputs  
for most agricultural enterprises**

18

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Organic farming is a systems-based approach that reduces the need for off-farm inputs for most agricultural enterprises. This is most evident in agronomic crops and livestock operations. It is less true for the production of tree fruits and crops with high cosmetic requirements, especially in humid climates where disease and insect pressure can be high.

**Conventional Mindset  
(Shared by Organic  
Farmers focused on  
Input Substitution)**

**A  
GOOD  
CROP**

**Off-Farm  
Inputs**

**Soil Base**

19

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Unfortunately, most new organic farmers don't recognize this advantage of organic management and continue to think like conventional producers—believing that a good crop is almost totally dependent on purchased inputs.

So how does the organic system work to reduce the need for off-farm inputs? It begins with the basic organic strategy for soil management.

## Organic Soil Management

*Feed the Soil,  
Not the Plant.*

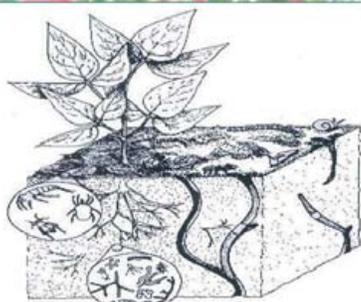
— An Old Saying among Organic Farmers

20

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Organics is a soil-based agricultural system. You can sum up its basic strategy with the words “feed the soil”—a phrase that organic farmers have used for decades. And when these farmers talk about feeding the soil, they’re talking about feeding what’s called the “soil food web.”

## The Soil Food Web

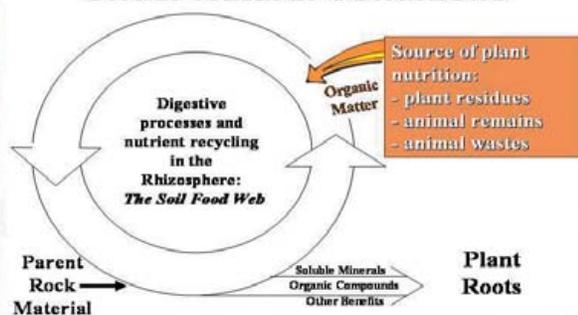


21

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The soil food web is a fancy term for the marvelous host of living organisms that make up a living soil—creatures like earthworms, fungi, bacteria, nematodes and insects. THESE are the regenerative agents that build soil. Their basic food is organic matter and the mineral nutrition bound up in organic matter.

## Plant Nutrition Under Natural Conditions

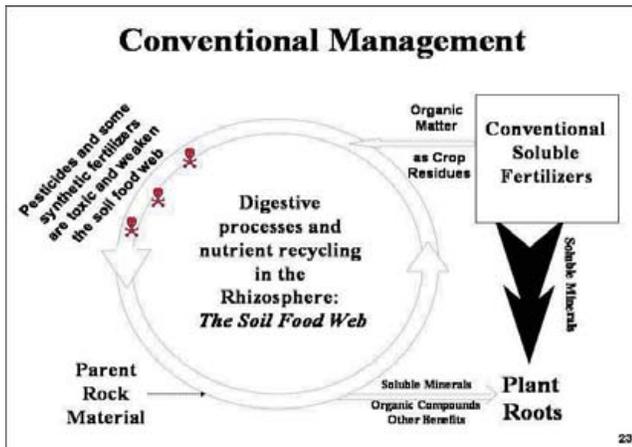


22

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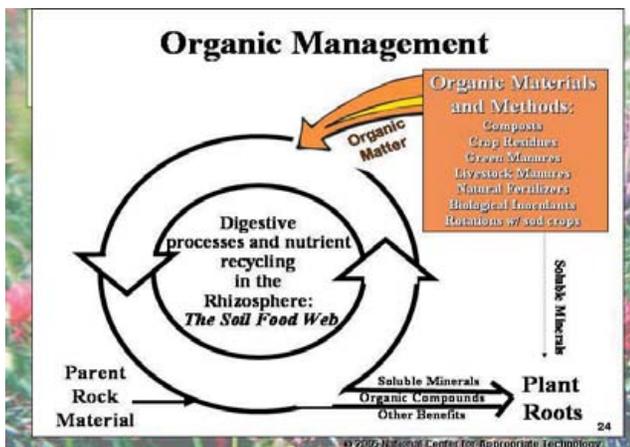
The concept of *feeding the soil* is based on what **nature** does. Let’s take a closer look at that.

Under natural conditions, the soil food web is the stomach of plants. These organisms digest the leaves, dead plants and animals, and release the nutrients to the plants, mostly as soluble minerals. But what the soil food web also does is manufacture a whole array of healthy organic chemicals like chelated nutrients (which are more available to plants), antibiotics, and growth compounds that also contribute to plant health. Organic acids are released that free more nutrients from the parent rock material. Some organisms fix nitrogen from the air. And others produce glomalin—the glue that creates a good soil crumb structure and a healthy rooting bed for plants. The accumulated humus in the soil also becomes a sponge that holds soil water and staves off drought.

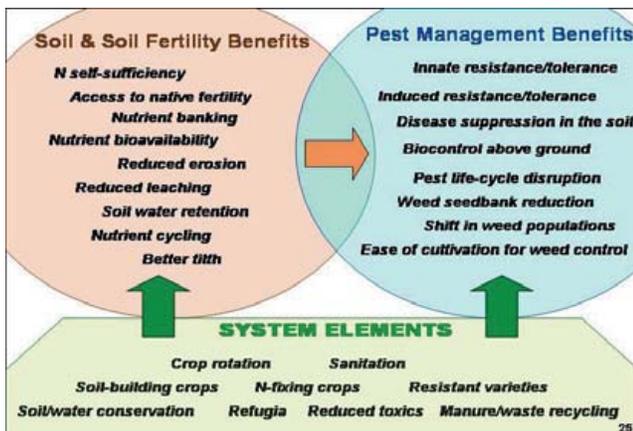


Now let's look at how conventional fertility management works. When soluble fertilizers are used, conventional farmers are bypassing the soil food web by providing plant nutrients as highly soluble fertilizer directly to plants—feeding the plant directly as opposed to feeding the soil first. There are several reasons why organic farmers decry this approach. One is that flooding the root zone with so much soluble nutrient encourages luxury consumption and makes plants more vulnerable to pests like aphids. We know this can be true with nitrogen, at least. But the main concern organic farmers have is that conventional inputs are typically used in place of soil-building practices and this neglects the soil food web. Essentially the only organic matter provided to the web is crop residue from row crops, and that may be limited.

If you don't feed and tend to the soil food web, it becomes diminished. It becomes even more diminished because some fertilizers and most pesticides that accompany them are toxic to soil life. This is why it is often a challenge to convert a conventional farm to organics. The soil food web is depleted, and the land is dependent on chemical inputs for an acceptable level of production. Transitioning farmers often see their yields fall dramatically, and pest and weed problems proliferate. It takes time for the soil food web to rebuild the capacity of the land to produce a good crop again. This is one of several reasons why there is a three-year transition period for farms converting from conventional to organic production.



In contrast to conventional management, organic farming concentrates on nature's approach—feeding the soil food web by adding organic matter. This is why it is sometimes called "natural farming." Organic management builds the soil's capacity and resilience. In this traditional organic strategy, very few fertilizers are intended to feed the plant directly. The goal is to work through the soil food web.



So what we have with organic management is a number of interrelated practices that stress soil building, along with support for biodiversity in the agro-ecosystem, reduction of toxics, and some common-sense preventive practices, such as the use of resistant varieties and basic sanitation procedures. These are the fundamental system elements that directly build the soil and soil fertility, and both directly and indirectly provide a high degree of pest management.



Where the basic organic system is not adequate to control a pest or weed problem, traditional organic farmers turn next to cultural practices (cultivation, flaming, trapping, mulching, etc.) before finally spending money on off-farm inputs. Therefore, while traditional organic farmers still use off-farm inputs of one sort or another, their overall reliance on commercial materials is much less than a conventional farmer or an organic farmer locked into simple input substitution.

### Recommended Resources

- **Switching to a Sustainable System**  
[www.npsas.org/OrderForm.html](http://www.npsas.org/OrderForm.html)
- **Transitioning to Organic Production**  
[www.sare.org/publications/organic/organic.pdf](http://www.sare.org/publications/organic/organic.pdf)
- **Fundamentals of Organic Agriculture**  
[www.extension.iastate.edu/Publications/PM1880.pdf](http://www.extension.iastate.edu/Publications/PM1880.pdf)
- **Organic Crop Production Overview**  
[www.attra.ncat.org/attra-pub/organiccrop.html](http://www.attra.ncat.org/attra-pub/organiccrop.html)

27

Here are a few good resources that go further in explaining how organic systems work and how they reduce reliance on off-farm inputs.

### What about Seeds & Planting Stock? What are the Risks?

**Failure to comply with organic requirements for seed and planting stock can lead to decertification of a single crop.**

**Land can be decertified for 36 months if treated or genetically engineered seed is used.**

28

Fertilizers and pesticides are not the only off-farm inputs that organic producers purchase. They also buy seeds and planting stock. The National Organic Standard dedicates an entire section to seeds and planting stock that producers must comply with. Failure to comply can lead to decertification of a single crop, if organic sourcing requirements are not met. It can lead to decertification of the land for 36 months if treated or genetically engineered seed is used.

## Seed and Planting Stock

- **Organic seed and planting stock must be used** [§205.204(a)]
- **If not commercially available, untreated seed or planting stock may be used; no GMOs** [§205.204(a)(1)]



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Let's look more closely at the Regulation. The first rule of thumb is that you must use organic seed and planting stock. If the variety you need (or its equivalent) is not commercially available, you may use conventional seed, if it is not treated with a prohibited substance. A variety is considered commercially unavailable if you cannot locate an organic supplier. If there is an organic source for the seed, it might also be commercially unavailable if the supplier can't provide the quantity needed. For example, if you require several pounds of seed, and the only organic source is available in 1-ounce packets, the variety would be considered commercially unavailable.

Seed quality also determines commercial availability. If the only organic seed sources are infected with seed-borne diseases, have poor germination rates, or are contaminated with noxious weed seed, the variety would be considered commercially unavailable.

Higher prices are NOT acceptable reasons for not using organic seed and planting stock. Cost is NOT a factor in determining commercial availability.

Be certain, if you need to use non-organic seeds, that you are choosing varieties that are not genetically engineered.

## When non-organic seed or planting stock is used . . .

. . . certifiers require that producers make a good faith effort to find organic sources. Customarily, this means documenting contacts with at least three reasonable sources. Documentation can include catalogs, Web sites, phone calls, and letters.

— Resource: ATTRA's Documentation Forms publications



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When non-organic seed or planting stock is used, certifiers require that producers make a good faith effort to find organic sources. Customarily, this means documenting contacts with at least three reasonable sources. Documentation can include catalogs, Web sites, phone calls, and letters.

One resource we recommend is contained in ATTRA's Documentation Forms publications. In them you will find record sheets specifically designed for documenting seed source contacts.

## Seed and Planting Stock

- **Conventional seed treatments are prohibited, unless required by Federal or State regulations** [§205.204(a)(5)]
- **Organic transplants must be used** [§205.204(a)]



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Be certain you are using untreated seed. Most conventional seed treatments are going to be prohibited. The only time you can use conventionally treated seed is when such treatments are required by law.

Transplants MUST be produced organically. Lack of commercial availability does not apply to transplants. You can get a variance to use conventional transplants only if your organic transplants are destroyed by bad weather, a fire in the greenhouse, or some such disaster. You'll need to talk with your certifier first, though.

At this time, the open market for organic transplants is limited, so you should either contract with a certified organic greenhouse or plan to produce transplants yourself.

## ATTRA Resources: Organic Transplants

- **Potting Mixes for Certified Organic Production**  
[www.attra.ncat.org/attra-pub/potmix.html](http://www.attra.ncat.org/attra-pub/potmix.html)
- **Organic Plug and Transplant Production**  
[www.attra.ncat.org/attra-pub/plugs.html](http://www.attra.ncat.org/attra-pub/plugs.html)

ATTRA has a couple of publications to assist you should you want to produce your own organic transplants. They are *Potting Mixes for Certified Organic Production* and *Organic Plug and Transplant Production*.

## Seed and Planting Stock: Avoiding the Pitfalls

- Organic requirements apply to cover crops
  - Seed for sprouting *MUST* be organic [§205.204(a)(1)]
  - Inoculants must be non-GMO
  - Many commercial seed coatings are prohibited
  - Perennial planting stock—consult your certifier
- §205.204(a)(4) is being interpreted in several ways

A few additional comments should be made regarding seed and planting stock requirements. The requirement for organic seed also applies to cover crops. If you produce sprouts, organic seed *MUST* be used; there is no alternative allowed. Legume inoculants must be non-GMO and must not contain any prohibited substances. There was great concern that non-GMO inoculants would become hard to find. However, at the present time, the vast majority of rhizobial inoculant products are non-GMO and are allowed in organic production. Generally, you can find the non-GMO statements on the company Web sites, ready to print. Be certain to obtain such documentation for your certifier to review.

Many of the commercial seed coatings for making pelleted seed are prohibited. There are some organically acceptable processes and products in use. A number of seed companies are using them. You will have to look around and ask.

Finally, if you are growing crops such as strawberries, raspberries, orchard crops, or the like, the requirements for perennial planting stock are confusing. Many certifiers expect producers to follow the same requirements as they would for seed. Some add the additional requirement that non-organic stock be under organic management for 12 months before any fruit or other harvest can be sold as organic. This is not an issue with tree fruits or nuts, but can be with annual strawberry and greenhouse raspberry production. Talk to your certifier to be certain you know what the expectations are in advance.

## Finding Organic Seed & Planting Stock

- **ATTRA's Suppliers of Seed for Certified Organic Production**  
[www.attra.ncat.org/attra-pub/altseed.html](http://www.attra.ncat.org/attra-pub/altseed.html)
- **OMRI-Certified Organic Seed and Planting Stock List**  
[www.omri.org/OMRI\\_SEED\\_list.html](http://www.omri.org/OMRI_SEED_list.html)

Finding organic seed and planting stock is not always easy. Here are some resources for you to try. ATTRA has a good list. But be advised, ATTRA does not guarantee that all listed parties are organically certified. You need to confirm that when you make contact.

OMRI has a fee-based listing service. OMRI Listed seed and planting stock sources are vetted, and there should not be any question of their organic status.

## Finding Organic Seed & Planting Stock

- **Save Our Seed's Certified Organic Seed Sourcing Service**  
[www.savingourseed.org/pages/sourcing.htm](http://www.savingourseed.org/pages/sourcing.htm)
- **Cooperative Extension Resources;**  
e.g., *Seed Production and Seed Sources of Organic Vegetables*, Univ. of FL Ext. Pub. HS981  
<http://edis.ifas.ufl.edu/hs227>

35

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There is a new service available beginning in 2005 from "Save Our Seeds" that was started with a SARE Grant. Currently, this is a free service.

Finally, a few Cooperative Extension resources listing organic seed sources have become available. The slide provides the URL for one of these, published by the University of Florida.

## Documents You **Need** to Save

- **Seed purchase receipts**
- **Non-GMO declarations for non-organic seed**
- **Labels and non-GMO statements for seed inoculants**
- **Receipts and labels for all materials used if you produce your own transplants**

36

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There are a number of documents you will need to save to demonstrate to your certifier that you are in compliance with the National Organic Standard with regard to seed and planting stock. These include:

- Seed packets or tags
- Non-GMO declarations for non-organic seed
- Seed purchase receipts
- Labels and non-GMO statements for seed inoculants
- Receipts and labels for all materials used, if you produce your own transplants

## Be **Sure** to Record...

- **What is planted where**  
(i.e., which crops in which fields or beds)
- **Planting dates**
- **Attempts to find organic seed and planting stock**

37

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Be certain that you record:

- What is planted where; that is, which crops or varieties are planted in which fields or beds
- Planting dates
- Your attempts to find organic seed and planting stock

## Helpful Record-Keeping Tools

- **Organic Field Crops Documentation Forms**  
[www.attra.ncat.org/attra-pub/cropforms.html](http://www.attra.ncat.org/attra-pub/cropforms.html)
- **Organic Livestock Documentation Forms**  
[www.attra.ncat.org/attra-pub/livestockforms.html](http://www.attra.ncat.org/attra-pub/livestockforms.html)
- **Organic Orchard, Vineyard, and Berry Crop Documentation Forms**  
[www.attra.ncat.org/attra-pub/orchardforms.html](http://www.attra.ncat.org/attra-pub/orchardforms.html)
- **Recordkeeping and Budgeting Workbook for Organic Crop Producers**  
[www.attra.ncat.org/attra-pub/organiccropforms.html](http://www.attra.ncat.org/attra-pub/organiccropforms.html)

38

ATTRA's Documentation forms publications include a number of individual documents that can assist you in recording your seed search and other information you need to keep for the certifier.

## Seed-Saving Resources

- **Save Our Seed project** features on-line manuals for brassica, tomato, and bean seed production, as well as a manual on seed processing and storage  
[www.savingourseed.org](http://www.savingourseed.org)
- **International Seed Saving Institute** has a free on-line guide to saving seed  
[www.seedsave.org](http://www.seedsave.org)
- **Seed-saving and Seedsavers' Resources**  
<http://homepage.tinet.ie/~merlyn/seedsaving.html>
- **Seed Savers Exchange** links people who grow, collect, conserve, and share seeds of heirloom plants  
[www.seedsavers.org](http://www.seedsavers.org)

39

One option organic growers can choose is to produce and save their own seed, thus reducing their off-farm purchases even further. Take note, however, that seed saving can be difficult to do with some crops in some parts of the country. Also, the seed of hybrid varieties cannot be successfully saved and re-planted. The slide provides contact information for several helpful seed saving resources.

## Risk Management for Organic Crop Producers

*For more information, please contact:*

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**Reducing Transition and Compliance Risks for  
Organic Crop Producers in the South**



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# NOTES

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