

Organic System Plans: Livestock Production



This document was developed in 2006 by the National Center for Appropriate Technology (NCAT) with funds provided by the USDA National Organic Program (NOP). It provides a realistic example of an organic system plan based on best interpretations of the National Organic Standard by NCAT and a team of representatives from the wider organic community. It is not an official NOP document and should not be treated as such. Distribution is provided by NCAT's ATTRA - National Sustainable Agriculture Information Service project.

Acknowledgements:

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Introduction. If you want to certify your livestock operation(s) as organic, you will need to complete an application form. This guide was developed to assist you in completing that application by explaining just what information certifiers want and why it is required.

If you raise crops or provide pasture to feed your organic livestock, you will also need to complete a basic farm application. While some certifiers combine crops and livestock into a single application form, most use separate documents. For an example of a completed crop farm application, see ATTRA's *Organic System Plans: Field and Row Crops and Pasture and Range Systems*.

Our example. Some of the best tools for teaching are practical examples. That is what we've provided in this guide. Our example is a highly diverse, grass-based livestock farm. Maple Knoll Farm covers 240 acres of rolling land in Pennsylvania. It is owned and operated by George and Helen Smith, along with their five children. Their enterprises include a dairy, dairy beef, sheep for both wool and meat, and free-range egg production. They have been organic since 1991.

The farm also sustains itself by growing and marketing breeder stock. The Smith family is interested in minor breeds conservation. Their dairy herd features dual-purpose Devon cattle. The sheep are Jacob and Gulf Coast Native breeds—the former chosen for its colored wool, the latter for its resistance to internal parasites. The chickens are dual-purpose Black Australorp. This breed was chosen for its prolific production of brown eggs. Most of the cropland is in pasture, rotated with oats and corn. All crops are used as feed on the farm.

While this makes for an atypical farm, it allows us to demonstrate and discuss a full range of enterprise types, while still providing a realistic model. We chose to locate the farm in Pennsylvania because we believe the climate and markets would be friendly to such an operation.

The application form we have chosen is based on a template developed in 2006 by the National Center for Appropriate Technology with funding from the National Organic Program. It is based on application forms in active use by certifying agents during the 2005 and 2006 seasons. The application form your certifier provides may well resemble this one. If not, it will still solicit the same kinds of information as this document.

Why are applications for certification so long and detailed? An application for certification serves two purposes. First, it provides basic contact and background information that the certifier needs to assess your compliance with the Organic Foods Production Act and the USDA Organic Regulations. Second, it meets the specific requirement of the National Organic Regulations for an organic system plan, as specified in §205.201 of the National Organic Program. Your organic system plan explains how you plan to manage your livestock in compliance with the Organic Regulations. When you and your certifier agree on the details, it becomes a contract and roadmap that you are expected to follow.

Will I need to complete such a long form every year? Not necessarily. Under most circumstances, you will need to complete a lengthy, detailed application only for your first year of production. Thereafter, most certifiers allow you to submit much shorter update forms that list any planned changes, although a few require submission of a full application every 3 to 5 years.

In our example, we are including an update form for the farm, along with a map and field history sheet, so you can better understand the model farm we are using. The livestock application form, however, is full length. This will give you a better idea of what a good, compliant organic livestock farm might look like after several years of operation. There is also a Handler Application Form—something that may or may not be appropriate for you. In our example the farmer candles, grades, labels and packages eggs for sale. This requires that an additional form—a handler plan—be filed with the certifier.

Navigating this guide. The guide provides an example of what a good application and system plan might look like. Notes are provided wherever supplementary information is appropriate. There are also references to ATTRA publications and other helpful materials.

The application document has three sections:

- | | |
|---|---------|
| a) Farm Plan Update Form
with maps and field history sheet | page 6 |
| b) Livestock Application | page 20 |
| c) Handler Application | page 59 |

The format is consistent with the way many organic applications are arranged.

Need further background on organic farming and the Regulations? To read the National Organic Regulations, see the National Organic Program Web site at www.ams.usda.gov/nop/NOP/NOPhome.html. To understand what organic production entails as far as strategies, techniques and basic system design, see ATTRA's *Overview of Organic Crop Production*. For information on organic certification and background on organic regulation, ask for ATTRA's *Organic Farm Certification and the National Organic Program*. For guides on transitioning your operation to organic production, try NCAT's *Organic Crops Workbook* and the *Organic Livestock Workbook*. To aid in getting ready for the on-site inspection—a key step in the certification process—ask for ATTRA's *Preparing for an Organic Inspection: Steps and Checklists* and *Organic Certification Process*. ATTRA publications can be found on the Web at www.attra.ncat.org. Print copies can be requested by calling 1-800-346-9140.

What the organic regulations say about organic system plans

§205.201 Organic production and handling system plan.

(a) The producer or handler of a production or handling operation, except as exempt or excluded under §205.101, intending to sell, label, or represent agricultural products as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:

- (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;
- (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;
- (3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented;
- (4) A description of the recordkeeping system implemented to comply with the [recordkeeping] requirements established in §205.103 [of the National Organic Regulations];
- (5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and
- (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.

(b) A producer may substitute a plan prepared to meet the requirements of another Federal, State, or local government regulatory program for the organic system plan: Provided, That, the submitted plan meets all the requirements of this subpart.

Lehigh Valley Organic Certifiers Farm Plan Update

This form should be filled out by crop producers to update their organic farm system plans. Use additional sheets if necessary. Attach a field history sheet for current year and updated farm maps (if any changes).

SECTION 1: General Information				NOP Rules 205.406(a)(2) and 205.401(b)
Name <i>George & Helen Smith</i>		Farm Name <i>Maple Knoll Farm</i>		Type of Farm/Crops <i>Mixed livestock, feed grains & rotation pasture/hay</i>
Address <i>423 Sandpiper Rd.</i>			City <i>Shelby</i>	
St./Prov. <i>PA</i>			Postal/Zip Code <i>17001</i>	
Country <i>U.S.A.</i>			E-mail <i>smith@diversifiedfarm.net</i>	
Phone <i>570-222-1001</i>		Fax <i>570-222-1001</i>		Organic Certification No. <i>C034</i>
Legal Status: <input checked="" type="checkbox"/> Sole proprietorship <input type="checkbox"/> Trust or nonprofit <input type="checkbox"/> Corporation <input type="checkbox"/> Cooperative <input type="checkbox"/> Legal partnership (federal form 1065) <input type="checkbox"/> Other-specify				Do you understand current organic standards? <input checked="" type="checkbox"/> yes <input type="checkbox"/> no
Year first certified <i>1991</i>		List previous organic certification by other agencies <i>1991-2000</i> <i>Penn State Organic Certifiers</i>		List current organic certification by other agencies <i>None</i>
Have you ever been denied certification? <input type="checkbox"/> yes <input checked="" type="checkbox"/> no		If yes, describe the reasons for denial and attach documentation of corrective actions.		
Preferred dates and time for inspection visit: <i>Any weekday, Monday through Friday</i> <input checked="" type="checkbox"/> morning <input checked="" type="checkbox"/> afternoon <input type="checkbox"/> evening				

SECTION 2: Minor noncompliances		NOP Rule 205.406(a)(3)
Did you have any minor noncompliances from last year's certification? <input checked="" type="checkbox"/> yes <input type="checkbox"/> no		
If yes, please complete the following table, listing each minor noncompliance.		
MINOR NONCOMPLIANCE	DESCRIBE HOW YOU ADDRESSED THE MINOR NONCOMPLIANCE.	
<i>§205.204(a)(1) Lacked search documentation for use of nonorganic seed.</i>	<i>Will provide contact documentation for at least three sources in the event that nonorganic seed is used in the future. Blank documentation forms have been acquired.</i>	
<i>§205.206(f) Replacement corner post in NW corner of field A-1 is treated wood.</i>	<i>Treated wood post was removed and replaced with concrete post.</i>	

Farm plan update notes

The farm plan application. The farm plan application is the organic system plan for your land and crops, including pasture and range. If you provide range and pasture, or grow other feed crops for your organic livestock, you need to submit a farm plan. Note that a few certifiers combine the farm plan and the livestock plan into a single application document.

Almost all organic livestock producers are required to file an organic farm or crop plan in addition to a livestock plan. Among the few possible exceptions are the producers of non-ruminant livestock who purchase all of their feed and provide no form of pasture. In such instances, a farm plan may still be required to address outdoor access areas.

What does a full farm plan application look like? Examples of complete farm plan applications are illustrated in ATTRA's *Organic System Plans: Field and Row Crops and Pasture and Range Systems* and *Organic System Plans: Market Farms and Greenhouses*.

When can update forms (like the one in this example) be used? Once you have a full organic farm system plan on file with your certifier, a shorter form might be provided for subsequent updates. This is a common practice, though it is entirely the choice of the certifier.

Additional documents. A completed update will also include a revised field history form, showing the current or upcoming crop year. It will also include a copy of the farm map, if there are changes to note. Recent soil and water tests are often attached, when appropriate, as are copies of other documents that address prior or adjacent land use. For good examples of these see ATTRA's *Organic System Plans: Field and Row Crops and Pasture and Range Systems* and *Forms, Documents, and Sample Letters for Organic Producers*. George and Helen have included their most recent soil audit and a letter from their neighbor confirming that his property is managed organically.

Minor noncompliances. If you have been certified in the previous year, your certification may have been granted on the condition that you correct one or more minor noncompliances. You should already have corrected these and informed the certifier. However, many certifiers want this information repeated on the update application. Take particular note of the second noncompliance on the Smith application. It involves the improper use of treated wood. Once an operation has been certified, treated wood may not be used for new installations or repairs where it might cause contamination of soil, crops or livestock [§205.206(f)]. See ATTRA's *Organic Alternatives To Treated Lumber* for other options.

A. CURRENT CROP PLANS

Please complete the following table for all current year's crops or products requested for certification.

CROPS REQUESTED FOR CERTIFICATION	FIELD NUMBERS	TOTAL ACRES/HECTARES	PROJECTED YIELDS
<i>Pasture & hay</i>	<i>A-1, A-3, A-4, A-5</i>	<i>185 a.</i>	<i>700 tons. All production either to be grazed or harvested for hay for on-farm use.</i>
<i>Oats</i>	<i>A-1</i>	<i>50 a.</i>	<i>4900 bu.</i>
<i>Corn</i>	<i>A-2</i>	<i>42</i>	<i>5900 bu.</i>

B. ORGANIC FARM PLAN CHANGES

What year did you last submit a complete Organic Farm Plan Questionnaire? *2001*

Have you reviewed your Organic Farm Plan Questionnaire? yes no Date of review: *January 2006*

Check the following categories where changes have been made in your Organic Farm Plan and summarize all changes made or planned to be made. Attach additional sheets if necessary. No changes

FARM PLAN TOPIC	SUMMARY STATEMENT OF CHANGES
<input checked="" type="checkbox"/> General information	<i>Note new e-mail address.</i>
<input type="checkbox"/> Newly purchased or rented fields*	
<input type="checkbox"/> Farm maps	
<input type="checkbox"/> Seeds and seed treatments	
<input type="checkbox"/> Seedlings and perennial stock	
<input type="checkbox"/> Soil fertility management	
<input type="checkbox"/> Compost or manure use	
<input type="checkbox"/> Conservation practices	
<input checked="" type="checkbox"/> Water quality and use	<i>Have completed 4 fenced water crossings to better protect stream and riparian areas.</i>
<input type="checkbox"/> Crop rotation	
<input checked="" type="checkbox"/> Weed management plan	<i>Will begin using flame weeding on corn fields.</i>
<input type="checkbox"/> Pest management plan	
<input type="checkbox"/> Disease management plan	
<input type="checkbox"/> Adjoining land use and buffers	
<input type="checkbox"/> Split or parallel operation	
<input checked="" type="checkbox"/> Equipment	<i>Bought used flame weeder.</i>
<input type="checkbox"/> Harvest plan	
<input type="checkbox"/> Postharvest handling	
<input type="checkbox"/> Crop storage	
<input type="checkbox"/> Crop transportation	
<input type="checkbox"/> Recordkeeping system	
<input type="checkbox"/> Type of marketing/product labels	

*** If you have newly purchased land or have rented land this year that is being requested for certification, attach a signed statement from the previous owner (if purchased) or current owner (if renting) attesting to previous three-year history and inputs applied.**

C. INPUTS

List all seeds used or planned for use in the current crop season. Check the appropriate boxes and provide other information as needed. Attach additional sheets if necessary. Have all labels and receipts available for the inspector.

Seed/Variety/Brand	Organic (✓)	Untreated (✓)	Treated (✓)	GMO (✓)	Type/Brand of Treatment		Describe your attempts to use organic/untreated seed
					Fungicide	Inoculant	
<i>Tug of War Alfalfa</i>	✓					✓	
<i>Alice White Clover</i>		✓				✓	<i>Checked 3 sources</i>
<i>Timothy</i>	✓						
<i>Puna Chicory</i>	✓						
<i>Niva Orchardgrass</i>	✓						
<i>Buff Hulless Oats</i>	✓						
<i>NC+ 68F32 Corn</i>	✓						
<i>NC+ 72H54 Corn</i>	✓						

List all fertility inputs, soil mix ingredients, pest and disease control products, water additives or other inputs used or intended for use in the current season on proposed organic and transitional fields. Use additional sheets if necessary. All inputs used during the current year must be listed on your Field History Sheet.

Have all labels and receipts available for the inspector.

No inputs used

PRODUCT	BRAND NAME OR SOURCE	STATUS: APPROVED (A) RESTRICTED (R) PROHIBITED (P)	IF RESTRICTED, DESCRIBE COMPLIANCE WITH NOP RULE ANNOTATION	CHECK IF GMO (✓)
<i>Aglime</i>	<i>Pangaea Lime-stone Quarry</i>	<i>A</i>		
<i>Alfalfa inoculant</i>	<i>Nitragin Gold-Alfalfa</i>	<i>A</i>		
<i>Clover inoculant</i>	<i>Nitragin Gold-Clover</i>	<i>A</i>		
<i>Livestock manure</i>	<i>On-farm generated</i>	<i>R</i>	<i>Applied only to non-food crops.</i>	

D. MONITORING PRACTICES AND PROCEDURES Ongoing monitoring is required by the NOP Rule Section 205.201(a)(3).

Fertility Management Program

Rate the effectiveness of your fertility management program: excellent satisfactory needs improvement

Describe any changes you have made or intend to make based on the results of your monitoring program.

Continue to soil test and lime as needed.

Natural Resource Management

Rate the effectiveness of your soil conservation program: excellent satisfactory needs improvement

Describe any changes you have made or intend to make based on the results of your monitoring program.

None.

Rate the effectiveness of your water quality program: excellent satisfactory needs improvement

Describe any changes you have made or intend to make based on the results of your monitoring program.

Except for graveled stream crossings, livestock are fenced out of the stream and the riparian areas.

Note: Our 3-year biodiversity plan, begun last year and on file with our application, is still in effect. No changes.

Weed, Pest and Disease Management

Rate the effectiveness of your weed management program: excellent satisfactory needs improvement

Describe any changes you have made or intend to make based on the results of your monitoring program.

In-row weed control in corn is still a problem. Will begin using flame weeding in 2006.

Rate the effectiveness of your pest management program: excellent satisfactory needs improvement

Describe any changes you have made or intend to make based on the results of your monitoring program.

None.

Rate the effectiveness of your disease management program: excellent satisfactory needs improvement

Describe any changes you have made or intend to make based on the results of your monitoring program.

None.

Other Monitoring: Indicate if you conduct monitoring in the following areas:

Maintenance of Organic Integrity

yes no Adjoining land uses, buffers, notification letters, posting signs

yes no Input equipment cleaning (sprayers, planters, etc.) *All equipment is dedicated organic.*

yes no Harvest equipment cleaning *All equipment is dedicated organic.*

yes no Crop testing for contaminants (prohibited materials, GMOs)

yes no Postharvest handling

yes no Crop storage cleaning

yes no Transportation of organic crops *All crops used on-farm.*

Recordkeeping

yes no Compost production records *No compost production.*

yes no Labor records

yes no Appropriate Organic Certificates or Transaction Certificates to verify purchase of organic products

yes no Complaint log

Section 4: Annual Summary of Organic Crop Yield and Sales

NOP Section 205.103

The following organic crops/products have been sold from _____ (date) to _____ (date). *Not applicable**

CROPS/PRODUCTS	# OF ACRES	ACTUAL YIELD	AMOUNT SOLD	AMOUNT LEFT TO SELL	REMAINING CROP STORAGE ID #

Expand table or attach additional sheets as necessary. ** All crops used on-farm as livestock feed.*

Section 5: Affirmation

I affirm that all statements made in this application are true and correct. No prohibited products have been applied to any of my organically managed fields during the three-year period prior to projected harvest. I understand that the operation may be subject to unannounced inspection and/or sampling for residues at any time as deemed appropriate to ensure compliance with the NOP Rule. I understand that acceptance of this questionnaire in no way implies granting of certification by the certifying agent. I agree to follow the NOP Rule.

Signature of Operator George Smith Date 2/12/06

I have attached the following documents:

- Updated maps of all parcels/fields (showing adjoining land use and field identification)
- Field history sheets for current crops
- Documentation for fields owned or rented for less than three years, if applicable
- Water test, if applicable
- Soil and/or plant tissue tests, if applicable
- Residue analyses, if applicable
- Input product labels, if applicable
- Organic product labels, if applicable

- I have made copies of this questionnaire and other supporting documents for my own records.

Submit completed form, fees, and supporting documents to:

**Lehigh Valley Organic Certifiers
PO Box 28
Shelby, PA 17001**

FIELD HISTORY SHEET

Code: O = Organic; T = In transition/conversion to organic; C = Conventional
 Producer name: George and Helen Smith

Code	Field No.	Acres/ha.	Year 2006		Year 2005		Year 2004		Year 2003	
			Crop	Inputs	Crop	Inputs	Crop	Inputs	Crop	Inputs
0	A-1	50 a.	Oats/pasture	Legume inoculants Aglime Manure	Corn		Pasture		Pasture	
0	A-2	42 a.	Corn		Pasture	Aglime	Pasture		Pasture	
0	A-3	45 a.	Pasture		Pasture	Aglime	Pasture		Oats/pasture	Legume inoculants Manure
0	A-4	45 a.	Pasture		Pasture	Aglime	Oats/pasture	Legume inoculants Manure	Corn	
0	A-5	44 a.	Pasture	Aglime	Oats/pasture	Legume inoculants Manure	Corn	M-Pede	Pasture	

Field history notes

Field history records that cover the three previous years are required. Field history forms are intended to demonstrate your compliance with: §205.202(3), which states that no prohibited substances may be applied in the three years prior to harvest of an organic crop, and §205.205, which requires a soil-building crop rotation.

Conventional production? In a split operation, where organic and conventional production are adjoining or close, and where equipment and storage are dual use, it is necessary to provide field histories for conventional fields as well.

Record all crops and cover crops. Be certain to indicate cover crop and double crops. When more than one crop is grown in a season, it can be shown using a slash (/) between the names of the crops. For example, George and Helen use this to method to show that an oats nurse crop is used to help establish their pastures (for example, oats/pasture).

Record ALL inputs used. All input materials used in crop production must be recorded. Among those that are often overlooked but need to be written down are seed coatings, seed treatments, inoculants, spray tank adjuvants and surfactants and foam markers. Remember to include treatments and inoculants that might be used on cover crop seeds.

Field names or numbers. It is important that field names or numbers be fully consistent with those used on the field maps and elsewhere throughout the application.

Maple Knoll Farm

George & Helen Smith

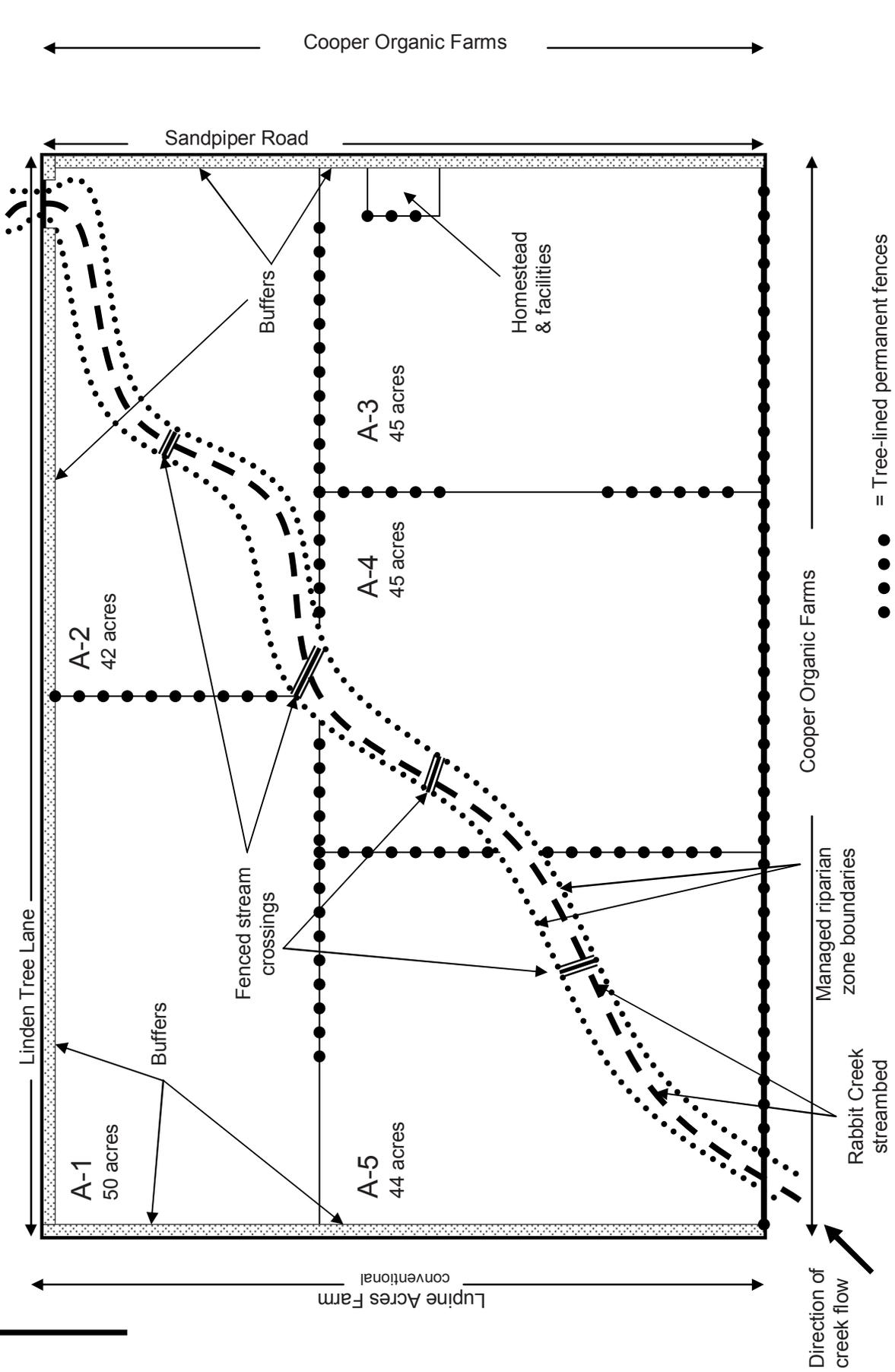
Shelby, PA

Prevailing winds
in summer



Lupine Acres Farm
conventional

Lupine Acres Farm
conventional



●●●●● = Tree-lined permanent fences

Map #1—Farm Map

Map notes

Are field maps required? There is no provision in the Organic Regulations specifically requiring field maps. However, maps are the chief means for demonstrating that you meet the requirement of §205.202(c), stating that organic fields must have “distinct, defined boundaries and buffer zones...” Furthermore, maps are customary and most certifiers will expect you to provide one.

Essential features of a good field map include:

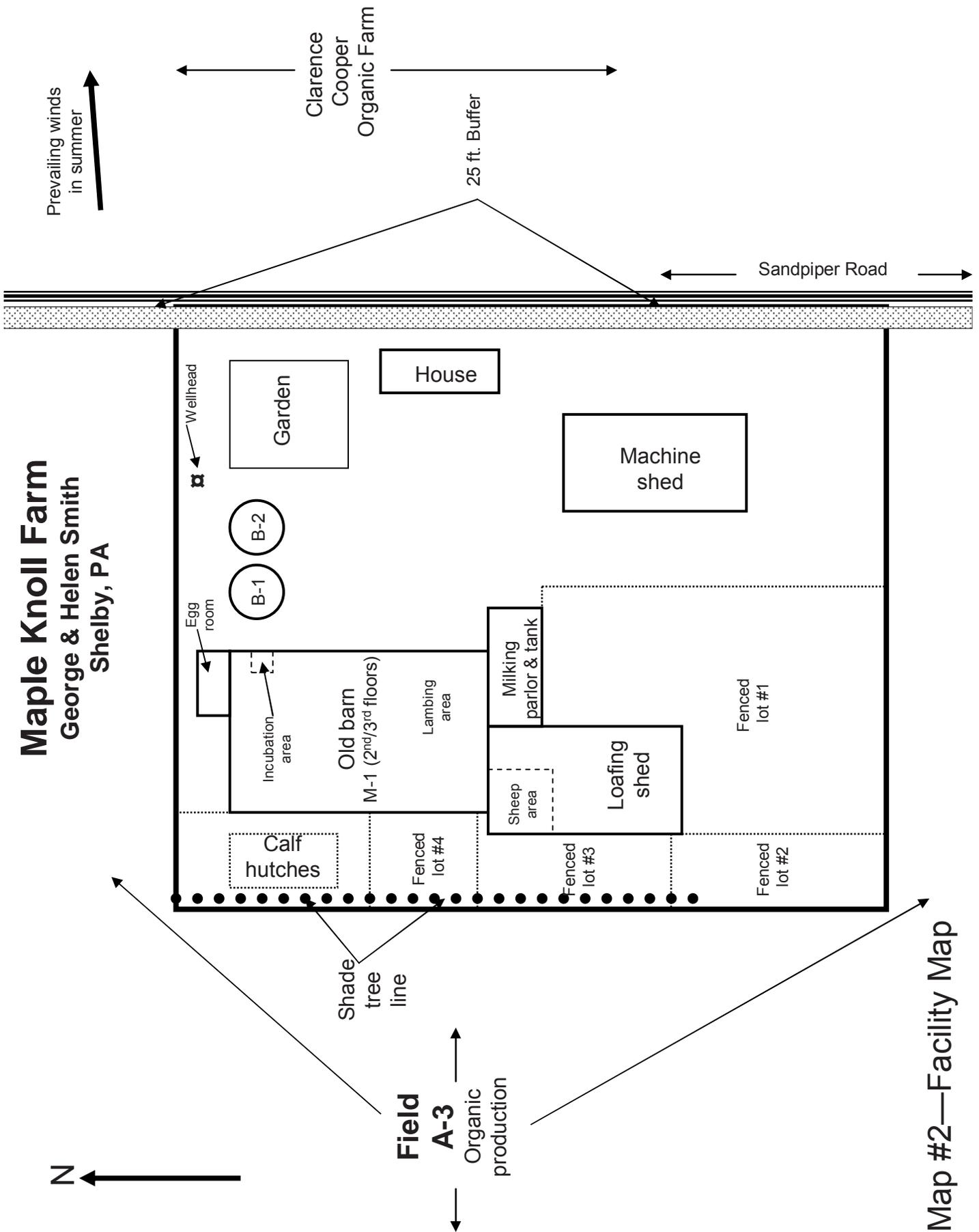
- ◆ Field locations with numbers or names, and the acreage
- ◆ Locations of roads and utility rights-of-way
- ◆ Hydrological features such as ponds, streams and wells
- ◆ Other natural features, such as woodlands and wetlands
- ◆ Locations of buildings and other structures
- ◆ Adjoining land use
- ◆ Orientation, such as an arrow indicating compass directions
- ◆ Prevailing wind direction during growing season
- ◆ Locations of field buffers. Buffers are strips of land that separate organic fields from conventional fields or other sources of contamination. No prohibited substances may be used in a buffer zone, however, any crops grown in the buffer may not be sold as organic.

Field names or numbers. Choose names or a numbering system that are clear and not confusing either to you, your farm staff or the certifier. A combination of a letter with a number, as George and Helen have done, is recommended. It is important that field names or numbers be fully consistent with those used on the field history sheets and elsewhere throughout the application.

Is a separate facility map necessary? When a farm operation becomes complex, with various livestock enterprises, on-farm processing, crop storage and more, it is customary to provide facility maps. Your certifiers will appreciate your foresight in providing one. This will be especially true if you have a split operation (one that produces both organic and conventional products). Important features to note on this facility map are the locations of feed storage areas, processing areas, buildings and animal handling areas.

Keep it simple. Maps must be sufficiently accurate to reflect the circumstances on the ground. They do not need to be elaborate. In fact, artistry and extraneous details can be confusing and are discouraged. While the Maple Knoll Farm maps are computer-aided drawings, free-hand drawing is acceptable as long as it is clear. It is also common for applicants to use Farm Service Agency (FSA) aerial photos, with details added using a pen or pencil.

Maple Knoll Farm
 George & Helen Smith
 Shelby, PA



Map #2—Facility Map

Benchmark Ag. Analysis Service

111 4th. Ave, Laurel, PA 17100 (570) 333-1001

Date printed: June 26, 2005

Client:
 George Smith
 Maple Knoll Farm
 423 Sandpiper Road
 Shelby, PA 17001

	A-1	A-2	A-3	A-4	A-5					
Organic matter	4.80%	4.50%	4.60%	4.40%	4.60%					
Soil pH	6.2	6.5	6.5	6.4	6.1					
Bray-1 Phosphorus	38 ppm	42 ppm	40 ppm	42 ppm	42 ppm					
Potassium	185 ppm	201 ppm	198 ppm	197 ppm	200 ppm					
Calcium										
Magnesium										
Sulfur										
Boron										
Copper										
Iron										
Manganese										
Zinc										
Sodium										

Cooper Organic Farms
423 Sandpiper Rd.
Shelby, PA 17001
January 14, 2006

To Whom It May Concern:

I am writing to confirm that all of my farm acreage, adjacent to Maple Knoll Farm to the South and the East, is certified organic by Acme Organic Certifiers. This land is not, and has not been, treated with prohibited materials for the past 15 years.

Sincerely,

Clarence Cooper

Clarence Cooper
570-222-1002

LIVESTOCK FORM SECTION

Lehigh Valley Organic Certifiers Organic Livestock Application Form

Please fill out this questionnaire if you are requesting organic livestock certification. Use additional sheets if necessary. Sign this form. You must also complete and submit an Organic Farm Plan, unless waived by Lehigh Valley Organic Certifiers. An update form, available from Lehigh Valley Organic Certifiers, may be used to update certification.

Section 1: General Information			NOP Rule 205.401
Name <i>George & Helen Smith</i>	Farm Name <i>Maple Knoll Farm</i>	Type of Operation <i>Dairy, dairy beef, wool, lamb, eggs, chicken</i>	
Address <i>423 Sandpiper Rd.</i>	City <i>Shelby</i>	Date <i>3/3/06</i>	For Office Use Only
State/Province <i>PA</i>	Zip code <i>17001</i>	Country <i>U.S.A.</i>	Date received
Phone <i>570-222-1001</i>	Fax <i>570-222-1001</i>	Date reviewed	
	Email <i>smith@diversifiedfarm.net</i>	Reviewer initials	
		Fees received	
		Inspector	
Legal status: <input checked="" type="checkbox"/> Sole proprietorship <input type="checkbox"/> Trust or nonprofit <input type="checkbox"/> Corporation <input type="checkbox"/> Cooperative <input type="checkbox"/> Legal partnership (federal form 1065) <input type="checkbox"/> Other (specify)			
Year first certified <i>1991</i>	List previous organic certification by other agencies <i>1991-2000, Penn State Organic Certifiers</i>	List current organic certification by other agencies <i>None</i>	
Is your farm operation <input checked="" type="checkbox"/> 100 percent organic <input type="checkbox"/> a split operation (both organic and conventional production)			
Indicate livestock enterprises requested for certification. <input checked="" type="checkbox"/> dairy <input type="checkbox"/> goats <input type="checkbox"/> hogs <input checked="" type="checkbox"/> beef <input checked="" type="checkbox"/> poultry <input checked="" type="checkbox"/> sheep <input type="checkbox"/> other _____ <input type="checkbox"/> other _____ If you have a split operation, list those enterprises that are conventional <i>Not applicable</i>			
Indicate livestock products requested for certification. <input checked="" type="checkbox"/> milk <input type="checkbox"/> processed milk products <input checked="" type="checkbox"/> eggs <input checked="" type="checkbox"/> meat products <input checked="" type="checkbox"/> live animals for slaughter <input checked="" type="checkbox"/> wool/hair <input checked="" type="checkbox"/> breeder stock and/or replacement dairy animals <input type="checkbox"/> hides <input type="checkbox"/> other _____ <input type="checkbox"/> other _____ If you have a split operation, list those products that are conventional <i>Not applicable</i>			
Have you ever been denied certification? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, describe the circumstances: <i>N/A</i>		
Has your certification ever been revoked or suspended? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please explain.			

Section 1 notes

Certification history. You must disclose your previous history of organic certification, including any minor noncompliances, denials, suspensions or revocations. Such information is specifically required in the Regulations under §205.401(c). Disclosing this information should not adversely affect your current application if you are currently in compliance with the National Organic Regulations. Concealing such information might be grounds for denial or decertification when discovered.

Split operations. A split operation is defined as an operation that produces or handles both organic and nonorganic agricultural products [§205.2]. The presence of nonorganic breeding animals, pet animals, or livestock made conventional through treatment with prohibited medications does not automatically make a farm a split operation. If you have, or expect to have, conventional livestock in your operation, check with your certifier to determine whether your farm is considered a split operation or not.

Do you have a copy of the current USDA organic standards? Yes No
 Do you have copies of all other standards (IFOAM, JAS, etc.) for which you are seeking certification? Yes No
 Not applicable

Do you intend to certify any crops, cropland or pasture acreage this year? Yes No
 If yes, have you also completed a basic Organic Farm Plan questionnaire? Yes No
 Not applicable
Please note that you must have an Organic Farm Plan Questionnaire on file to certify any land or crops including pasture. Contact Lehigh Valley Organic Certifiers to obtain an Organic Farm Plan Questionnaire.

Is any off-farm or on-farm processing done? (slaughtering, packaging, bottling, etc.) Yes No
 If yes, have you filled out an Organic Handling Plan Questionnaire? Yes No
 Not applicable
Please note that you must have an Organic Handling Plan Questionnaire on file to certify the processing/handling portion of your operation. Contact Lehigh Valley Organic Certifiers if you have questions or to obtain an Organic Handling Plan Questionnaire.

Give directions to your farm for the inspector.
Our farmstead is on the west side of Sandpiper Rd., 3/4 mile north of the junction with Co. Rd. 12 in Shelby. Sign is attached to mailbox.

When are you available to contact? Morning Afternoon Evening
 When are you available for the inspection? Morning Afternoon Evening

Section 2: Prior noncompliances NOP Rule 205.406(a)(3)

Did you have any noncompliances from last year's certification? Yes No Not applicable
 If yes, please complete the following table, listing each noncompliance.

NONCOMPLIANCE	DESCRIBE HOW YOU ADDRESSED THE NONCOMPLIANCE
<i>Noncompliance issues all related to crop production.</i>	<i>Details provided in the attached Farm Plan update.</i>

Attach additional sheet if needed

Section 1 notes (continued)

Different kinds of certification. Sometimes certifiers offer further certification services in addition to the USDA's NOP. For example, they might also be accredited to certify operations to the Japanese Agricultural Standard (JAS) or European Union (EU) standards. If so, this will probably be indicated on the first page. If so, discuss your needs with the certifier to determine whether you would benefit from additional certification and what the additional costs and requirements would be.

Organic Farm Plan Questionnaire. See the earlier section titled **Farm plan update notes** for details.

On-farm processing or handling. The NOP Regulations define handling as “sell(ing), process(ing) or package(ing) agricultural products.” However, this does not include selling, transporting or delivering crops or livestock by the producer to a processor or handler [§205.2]. In our example, the Smith family candles, grades, labels and packages their eggs for sale. Even though their operation is small, they must submit a handling system plan. A copy of their completed plan and application is included in this publication.

If you are uncertain whether you need to submit a handling plan, discuss your circumstances with your certifier.

Directions to your farm. Be clear and precise. Inspectors may add lost time and extra mileage to the cost of the inspection.

Section 2 notes

Prior noncompliances. If you were certified in the previous year, you may have received a letter from your certifier stating that your certification was conditional, that it depended on your correcting certain violations of the NOP Regulations. If that is your situation, simply provide the information requested, being certain you list all the cited noncompliances and what you did to address them. In our example, George and Helen provided this information on the Farm Plan Update form. It is OK to refer the certifier to another part of your application package, as long as all the necessary information is provided.

If you did not have any noncompliances in the previous year, or if this is your first application for certification, check the Not applicable box.

Provide the following information for the types and numbers of animals being raised for production for this year.

TYPE	ORGANIC	TRANSITIONAL	CONVENTIONAL
Dairy cattle	61	0	2
Dairy goats	0	0	0
Dairy sheep	0	0	0
Beef cattle	0	0	0
Meat goats	0	0	0
Meat/wool sheep	91	0	5
Hogs	0	0	0
Chickens	263	0	5
Turkeys	0	0	0
(other)	0	0	0
(other)	0	0	0
(other)	0	0	0
(other)	0	0	0

Section 4: Origin of Organic Livestock

A. SOURCE OF MAMMALIAN LIVESTOCK

Not applicable

Livestock products that are to be sold or represented as organic must be from livestock under continuous organic management from the last third of gestation. Except:

- Milk or milk products must be from animals that have been under continuous organic management for at least 1 year prior to production.
- Nonorganic breeder stock may be brought onto an organic operation at any time. However, if offspring from that stock are to be raised as organic, the breeder stock must be brought onto the operation prior to the last third of gestation.

Do you raise organic slaughter animals on-farm?

Yes No Not applicable

Do you raise organic dairy replacement animals on-farm?

Yes No Not applicable

Do you raise organic fiber producing animals on-farm?

Yes No Not applicable

Section 3 notes

Livestock inventory. The certifier wants you to provide a reasonably accurate inventory of your livestock at the time that your system plan is completed and submitted. It is understood that these numbers will likely change between the time of submission and the arrival of an inspector several weeks or months later. One of the many things an inspector will do is to update the inventory as part of his/her report to the certifier.

For more information about organic inspections, see ATTRA's *Preparing for an Organic Inspection: Steps and Checklists*.

Section 4 notes

Origin of livestock. How long must an animal be managed organically before it can be slaughtered and sold as organic meat? How long before it can produce organic milk or organic wool? An entire section of the Regulation—§205.236—addresses these questions. The answers vary considerably, depending on the species involved and other factors. For details that sort through this issue, see section XXIII of NCAT's *Organic Livestock Workbook*.

Whole farm conversion. When an entire dairy farm and its herd are converted to organic production, the herd may be fed transitional feed from that farm in the third year of transition, allowing the sale of organic milk immediately, once the farm is certified.

On-farm versus off-farm. Mammalian livestock must be under organic management from the last third of gestation to be organic slaughter stock. Organic milk may only come from animals that have been managed organically for at least 12 months. Therefore, it is very important to know and document the history of all your animals. The challenge increases with the importation of stock from off the farm. If you purchase organic dairy, slaughter or breeder stock, be sure to obtain organic certificates from the sellers and keep them in your files.

If you purchase any livestock, supply specific information: Not applicable

TYPE OF LIVESTOCK	IDENTIFICATION NO./NAME	DATE OF PURCHASE	PROJECTED OR ACTUAL BIRTHING DATE	PURCHASE SOURCE	ORGANIC (O) CONV. (C)	CERTIFICATION AGENCY?
<i>Devon Bull</i>	<i>B12</i>	<i>12/3/05</i>	<i>Not applicable</i>	<i>Devon Hills Farm Pacer, VT</i>	<i>C</i>	<i>Not applicable</i>
<i>Jacob Ram</i>	<i>R033</i>	<i>11/15/05</i>	<i>Not applicable</i>	<i>Jacob's Ladder Farm Lowell, MD</i>	<i>C</i>	<i>Not applicable</i>

attach additional sheet if needed

If you are a dairy operation, what is your current plan for replacement stock? Not applicable

- purchase organic dairy animals % of total replacements _____
- purchase conventional stock and transition them to organic % of total replacements _____
- raise own organic replacements % of total replacements 100%
- other (please explain) % of total replacements _____

B. SOURCE OF POULTRY Not applicable

Poultry or poultry products must be from poultry that have been under continuous organic management beginning no later than the second day of life.

Do you hatch your own poultry on-farm? Yes No

If you purchase your young poultry, supply specific information: Not applicable

TYPE OF POULTRY	FLOCK NUMBER	DATE OF PURCHASE	AGE AT PURCHASE	PROJECTED SLAUGHTER OR EGG PRODUCTION DATE	SOURCE

attach additional sheet if needed

Describe your management plan for raising chicks: Not applicable

What is the type and size of housing used? *Isolate small corner of the main barn.*

What is the approximate square footage per 100 chicks? *16 sq. ft.*

What bedding material is used? *On-farm, organic oat straw. Straw is fine-ground for use with chicks.*

What heating source is employed? *Electric heat lamps.*

Additional relevant details: *We have our own incubator.*

Section 4 notes (continued)

Breeding stock. Breeding animals may be brought onto an organic farm at any stage. However, these animals must be tracked and managed organically thereafter. They cannot be sold or slaughtered as organic. Note that George and Helen have purchased two such breeding animals in 2005.

Replacement dairy stock. Be very clear about your plans for replacing dairy animals. Certifiers will pay particular attention to this. The NOP has made it clear that calves born on organic farms must be raised organically from then on if they are to be put into organic production. They may NOT be treated with antibiotics or otherwise raised conventionally and then transitioned back to organic status later on.

Source of poultry. “Poultry or poultry products must be from poultry that have been under continuous organic management beginning no later than the second day of life” [§205.236(a)(1)]. Since most farmers obtain their birds as day-old chicks, there are fewer issues surrounding the origin of poultry going into organic production. In fact, it is quite unusual for producers to do as Maple Knoll Farm does by raising its own chicks. George and Helen do it because they are raising a somewhat rare breed and sell organic breeding stock.

Purchasing organic stock. If you are purchasing organic livestock, be certain to retain all documentation that proves the animal is organic. This includes the organic certificates mentioned earlier. It will be necessary to show such documentation to your inspector.

Bedding. If livestock are inclined to consume any bedding materials, the bedding must be organically produced and must be provided where appropriate. This is not a problem on the Smith farm, as they have an abundance of oat straw. Note that they grind the straw for use with chicks. This is not an organic issue but a practical production detail. Ground straw is considered less *slippery*—reducing the chances that chicks will injure themselves before their legs become strong.

Organic livestock producers must provide livestock with a total feed ration that is organically produced and handled, including pasture and forage. Nonsynthetic materials from any source and synthetic materials included on the National List may be used as feed additives and supplements. Plastic pellets and feed formulas with urea, manure or slaughter by-products are not allowed. Feed supplements or additives in amounts above those needed for adequate nutrition and health maintenance are not allowed. Save all purchased feed, feed supplement and feed additive labels and receipts for the inspector.

A. FEED

Feed ration table

LIVESTOCK TYPE (SLAUGHTER, REPLACEMENT DAIRY, YOUNG STOCK)	FEED OR RATION TYPE (HAY, SILAGE, GRAIN MIX, ETC.)	STATUS ORGANIC (O) TRANSITIONAL (T) CONVENTIONAL (C)	INGREDIENTS
<i>All dairy stock All sheep</i>	<i>Baled hay</i>	<i>0</i>	<i>Mixed legume, grass & forbs (same as pasture)</i>
<i>Dry cows, steers, bulls, young stock</i>	<i>Grain mix</i>	<i>0</i>	<i>Corn, oats, mineral mix, kelp, salt</i>
<i>Milkers</i>	<i>Grain mix</i>	<i>0</i>	<i>Corn, oats, Azomite, kelp, salt</i>
<i>All sheep</i>	<i>Grain mix</i>	<i>0</i>	<i>Corn, oats, Azomite, kelp, salt</i>
<i>Chicks</i>	<i>Total feed ration (purchased)</i>	<i>0</i>	<i>Corn, soy meal, Ca. carbonate, Di-calcium phosphate, vitamin pre-mix, salt, kelp</i>
<i>Laying hens</i>	<i>Total feed ration (purchased)</i>	<i>0</i>	<i>Corn, soy meal, wheat, Ca. carbonate, Di-calcium phosphate, vitamin pre-mix, salt, kelp</i>
<i>All poultry</i>	<i>Scratch</i>	<i>0</i>	<i>Corn</i>

attach additional sheet if needed

Section 5 notes

Feed ration table. The main reason the certifier wants the information in this table is to ensure that livestock are being provided with 100 percent organic feed and allowed supplements and additives as directed in §205.237(a) of the Regulations.

There are a few exceptions. Livestock in the operation that are not organic, or not in transition to organic milk production, can be fed nonorganic feed. Also, if you operate a dairy and the entire operation is being transitioned to organic, there are certain allowances for farm-raised transitional feed in the third and final year of conversion. This allows the farm to produce organic milk immediately after the land becomes certified, rather than waiting an additional year for the animals to consume certified organic feed.

If you are converting an entire dairy herd and will be grazing and feeding transitional crops, be certain to discuss this in advance with your certifier to determine your options and ensure that you remain compliant.

Providing adequate nutrition. The feed ration table also helps the certifier assess whether you are providing adequate and appropriate feed for your stock. The Regulations require that organic producers provide their livestock with feed rations sufficient to meet their nutritional requirements “including vitamins, minerals, protein and/or amino acids, fatty acids, energy sources and fiber” [§205.238(a)(2)]. A discerning certifier might question whether the farmers in our example are providing enough protein in their dairy ration, since most such mixes include soybean meal. If challenged by the inspector, George and Helen are prepared to explain that Devon cattle do not have as high a requirement for protein as a specialized dairy breed like Holsteins.

Do you raise any feed on your farm?

Yes No

If yes, please list

Pasture & hay, corn, oats.

Describe purchased feed:

Not applicable

(Enter purchased supplements and additives in section B.)

TYPE	SOURCES	CERTIFIED BY
<i>Chick feed, total ration</i>	<i>"Organic Chick" Bob's Organics Sunrise, NJ</i>	<i>Mid-Atlantic Organic Certifiers</i>
<i>Hen feed, total ration</i>	<i>"Organic Hen" Bob's Organics Sunrise, NJ</i>	<i>Mid-Atlantic Organic Certifiers</i>

attach additional sheet if needed

How do you verify that the feed ration is sufficient to meet nutritional requirements?

Feeding regimen was evaluated by Penn State area livestock specialist.

What is your plan for sourcing organic feed if you have a shortage?

The region has a lot of organic producers. Will try to buy local first.

B. FEED SUPPLEMENTS AND ADDITIVES

Not applicable

Trace minerals, including copper sulfate and magnesium sulfate, electrolytes and FDA-approved vitamins are allowed feed additives. Nonmilk products or products from BST-treated animals are not allowed. Products produced through genetic engineering (GE) or with the use of irradiation or sewage sludge are not allowed.

List all feed supplements and additives.

FEED SUPPLEMENT OR ADDITIVE	SOURCE	SYNTHETIC (Y/N)	REASON FOR USE
<i>Kelp (Thorvin Kelp for Animals)</i>	<i>Thorvin</i>	<i>N</i>	<i>Mineral supplementation</i>
<i>Natural minerals (Azomite)</i>	<i>Peak Minerals</i>	<i>N</i>	<i>Mineral supplementation</i>
<i>Natural Trace Mineral Salt</i>	<i>Redmond Minerals, Inc</i>	<i>N</i>	<i>Salt supplementation</i>

attach additional sheet if needed

Do you use conventional supplemental milk replacers?

Yes No

(Note: Conventional milk replacers without antibiotics were allowed for emergency use only until October 21, 2007, and are now prohibited.)

If yes, how do you know they do not contain antibiotics and are not made with milk from rBST-treated animals?

Not applicable.

Section 5 notes (continued)

Sources for organic feed. Feed for certified organic animals must be produced on **CERTIFIED** organic farms and, if processed, must also be handled by certified handlers. Therefore, any purchased organic feed will come from a certified source and will feature labels or other information that tell you who the certifier is. By extension, you may **NOT** use feed from, or pastures on, organic farms that are exempt from certification. Exempt farms are those that sell less than \$5,000 of organic products annually.

Emergency feed plan. Certifiers want you to have a plan in the face of a shortage of organic feed. Organic feed is usually more expensive than conventional feed, and would likely be much more so if a feed shortage occurred region-wide. It is a sound idea to have an emergency plan. If your plan includes the use of conventional feed, understand that any stock fed conventional feed would lose certified status and could **NOT** be sold as organic.

Feed supplements and additives. A feed supplement is specifically defined as “a combination of feed nutrients added to livestock feed to improve the nutrient balance or performance of the total ration and intended to be: 1) Diluted with other feeds when fed to livestock; 2) Offered free choice with other parts of the ration if separately available; or 3) Further diluted and mixed to produce a complete feed.”[§205.2]

A feed additive is defined as “a substance added to feed in micro quantities to fulfill a specific nutritional need; i.e., essential nutrients in the form of amino acids, vitamins and minerals.” [§205.2]

Synthetic methionine (DL-Methionine) could only be used as a feed additive for organic poultry until Oct. 1, 2008 [§205.603(d)(1)].

Note that the supplements and additives you list in this table should also be listed in the “Ingredients” (far right) column of the Feed Ration Table.

Conventional milk replacers. Milk replacers are considered feed supplements. Conventional milk replacers were allowed only in emergency circumstances until Oct. 21, 2007. If used, the conventional milk replacer may not contain antibiotics or non-milk products. It may not be derived from livestock treated with rBST. [§205.603(c)]

For more information. See Section XV of NCAT’s *Organic Livestock Workbook* for more information on organic livestock feed, supplements and additives.

C. FEED STORAGE

Describe your feed storage areas:

Not applicable

STORAGE ID NUMBER	TYPE OF FEED STORED	TYPE OF STORAGE	CAPACITY	ORGANIC (O) TRANSITIONAL (T) CONVENTIONAL (C)
M-1	Baled hay	Barn mow	175 T.	0
B-1	Oats	Metal bin	10,000 bu.	0
B-2	Corn	Metal bin	10,000 bu	0

attach additional sheet if needed

How do you prevent or control rodents in organic feed storage areas?

traps glue boards sanitation cats other (please explain)

D. ON-FARM AND CUSTOM FEED PROCESSING

Do you process your own feed (mix, grind, roast, extrude, etc.)?

Yes No

Please note: If you process organic feed for other producers or handlers, you must submit an Organic Handling Plan and become certified as an Organic Handler.

If yes, is the equipment also used for nonorganic products?

Yes No

If yes, how is equipment cleaned prior to processing organic feed to prevent commingling of organic and nonorganic? *Not applicable.*

swept out compressed air vacuumed purged other (please explain)

If purged, do you maintain records of dates, product and purged amounts?

Yes No

Not applicable.

Is any of your feed custom processed?

Yes No

If yes, is the operator certified organic? *Not applicable.*

Yes No

If yes, provide the name and contact information of the processor. *Not applicable.*

Section 5 notes (continued)

Feed storage. Feed storage areas should be clearly designated on your farm. If you also store non-organic feed, it is particularly important that these areas be numbered and shown on your facility map. Be certain that the numbers, names or other designations you use on the map are consistent with those you show in this table. Useful details on feed storage can be found in section XXIV of NCAT's *Organic Livestock Workbook*.

Feed processing. IMPORTANT: If organic feed is processed by anyone who is not a certified handler, or if organic feed is processed using equipment that also processes conventional feed and there are no records of proper cleanouts, the feed LOSES its organic status. For a good overview of options and details you need to address when processing feed, see section XXV of NCAT's *Organic Livestock Workbook*.

Livestock must have ready access to clean drinking water.

What are your sources of water for livestock use?

on-site well municipal river/creek/pond spring other (specify):

Are there immediate contamination threats to your water source(s), e.g., pesticide or fertilizer runoff, industrial pollution, etc.?

Yes No

If yes, please describe the threat and the steps you are taking to mitigate the threat.

Not applicable.

What is the date of your last water test for coliform bacteria and nitrates? *June 26, 2005*

(Attach copy if available) *See attached.*

If you use additives in the water, list them and state reason for use:

No additives used

If livestock have access to a river, creek or pond, how do you prevent bank erosion and degradation of water quality?

No access

Livestock access is restricted by fencing to graveled stream crossings.

Section 7: Living Conditions

Organic livestock operations must be based on systems that maximize health of animals and allow for their natural behavior. Animal environments must include access to shade; shelter; fresh air; the outdoors; exercise areas; direct sunlight suitable to the species, production stage and climate; clean and dry bedding as appropriate to the system; and facility design which is safe and allows for natural behavior. Manure must be managed such that nutrient recycling is optimized and soil and water degradation are minimized.

Describe housing used: *All facilities and outdoor livestock areas should be indicated on attached maps.*

TYPE OF HOUSING & MAP DESIGNATION	SIZE	TYPE OF LIVESTOCK HOUSED	NUMBER OF ANIMALS HOUSED
<i>Old barn</i>	<i>10,000 sq. ft.</i>	<i>lambing sheep young chicks</i>	<i>40 50</i>
<i>Loafing shed</i>	<i>8,000 sq. ft.</i>	<i>cows sheep</i>	<i>45 90</i>
<i>11 calf hutches</i>	<i>40 sq. ft. each</i>	<i>dairy calves</i>	<i>up to 11 at a time</i>
<i>5 portable egg mobiles (In A-3 in summer 2006; in Fenced Lot #4 in winter)</i>	<i>96 sq. ft. each</i>	<i>chickens</i>	<i>35-45 each</i>

attach additional sheet if needed

Section 6 notes

Water tests. Your certifier may or may not insist on annual water tests for livestock production. The nature of your operation and how water is used will affect this. Dairy operations and those in which water is used for any sort of on-farm processing are almost certain to require testing.

Section 7 notes

Stock density. Be honest about the number of stock that utilize the different buildings and shelters on your farm. The NOP Regulations do not provide hard-and-fast limits on the number of animals that may occupy given amounts of space. Judgment on suitability is in the hands of your certifier, is largely subjective, and is based on observations of whether the whole system allows livestock to exercise their natural behavior.

Is bedding used?

Yes No

If yes, is this bedding typically consumed by the livestock?

Yes No

If so, do you have verification that bedding is organic?

Yes No Not applicable

How often is housing cleaned out? *Daily when in constant use.*

Describe sanitation or cleaning products used:

No sanitation products used

Are any fumigants or prohibited pest control agents used in the facility?

Yes No

If yes, what steps do you take to prevent contamination of feed and livestock?

Not applicable

What source(s) of light is/are used in animal housing? *Natural and incandescent.*

Is day length regulated using artificial light?

Yes No

If yes, please describe: *Not applicable.*

What outdoor areas other than pasture do animals use? *Fenced lots around barn.*

How long are animals indoors (hours per day)? 8 spring 8 summer 8 fall 24 winter (*chickens*)

0 spring 0 summer 0 fall 0 winter (*sheep*) 1 spring 1 summer 1 fall 1 winter (*milk cows*)

If livestock are routinely denied outdoor access, please describe the circumstances and/or stages of production involved:

Not applicable

Describe locations of any treated (with prohibited materials) lumber that may come into contact with livestock:

None. See section on minor noncompliances.

Section 7 notes (continued)

Facility pest management. The NOP Regulations are written in a way that requires you to take a multi-level hierarchical approach to dealing with structural pests. Your strategy should begin with sanitation and prevention; rely secondarily on traps and other physical controls; and finally, on natural and allowed synthetic pesticides. Should these three levels of control be inadequate, you might be allowed to use a prohibited synthetic pesticide or fumigant, but only with advance approval by your certifier and with a clear understanding of how you will prevent contamination of organic livestock and feed. [§205.271(d)]

In addition, should you be required to use a prohibited pesticide in a facility by federal, state or local authorities, this is permitted as long as you take measures to ensure that contamination of organic livestock, feed or other products is prevented. [§205.271(f)]

For more details see Text Box 16B in section XVI of NCAT's *Organic Livestock Workbook*.

Outdoor access. Outdoor access must be provided to all livestock. [§205.239(a)(1)] Temporary confinement may only be used to deal with inclement weather, to protect the health and safety of the animal, to prevent damage to pasture or other resources or because a specific stage of production requires it. [§205.239(b)] Certifiers vary in their interpretations of which stage(s) of production justify confinement. If you plan routine use of temporary confinement, be very clear in explaining why you are doing so and how long the stock will be confined.

Treated wood. When an operation is converting to organic production for the first time, certifiers generally overlook any previous use of treated wood, unless it constitutes a clear hazard. Once you are certified, however, you may not use treated wood for new or replacement purposes in any location or circumstance where it might contact or contaminate organic livestock, their feed or organic crops, including pasture. [§205.206(f)] Note that this was among the minor noncompliances George and Helen had to address to be certified in the previous year (see the Farm Plan Update). They had used treated wood for a replacement corner post in an organic pasture. This was judged inappropriate and noncompliant. For more information on this topic see ATTRA's *Organic Alternatives to Treated Lumber*.

More information on organic livestock living conditions. See section XVI of NCAT's *Organic Livestock Workbook*.

The National Organic Standard requires access to pasture for all ruminants. Pasture must be managed to provide feed value and maintain or improve soil, water and vegetative resources.

Do you pasture any livestock?

Yes No

If yes, is pasture provided to ruminant stock?

Yes No Not applicable

If yes, is pasture provided to non-ruminant stock?

Yes No Not applicable

Please describe all pastures used by all livestock:

All pastures must be indicated on maps and field history forms. See attached.

PASTURE ID	ACREAGE	STOCKING RATE & LIVESTOCK TYPE	FORAGE MIX	WHAT GRAZING SYSTEM IS USED?	IS THE PASTURE ALSO MECHANICALLY HARVESTED?
A-1	50	None in 2006	Alfalfa, clover, grass, chicory	<input type="checkbox"/> Rotational <input type="checkbox"/> Continuous <input type="checkbox"/> Moveable pens No grazing or haying in 2006	<input type="checkbox"/> Yes <input type="checkbox"/> No
A-3	45	1 cow/acre 2 sheep/acre 4-5 chickens/acre	Alfalfa, clover, grass, chicory	<input checked="" type="checkbox"/> Rotational <input type="checkbox"/> Continuous <input checked="" type="checkbox"/> Moveable pens	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A-4	45	1 cow/acre 2 sheep/acre	Alfalfa, clover, grass, chicory	<input checked="" type="checkbox"/> Rotational <input type="checkbox"/> Continuous <input type="checkbox"/> Moveable pens	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A-5	44	1 cow/acre 2 sheep/acre	Alfalfa, clover, grass, chicory	<input checked="" type="checkbox"/> Rotational <input type="checkbox"/> Continuous <input type="checkbox"/> Moveable pens	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

attach additional sheet if needed

Which months of the year are ruminant livestock pastured?

Late March to mid October

Not applicable

How many days a year, on average, are ruminant livestock under the age of 6 months on pasture?

210 days

Not applicable

How many days a year, on average, are ruminant livestock over the age of 6 months on pasture?

210 days

Not applicable

What techniques are used to prevent waste runoff?

- rotate pastures
 buffer zones
 limit number of grazing animals
 harrow to spread manure evenly
 other (please describe)

What techniques are used to prevent erosion?

- avoid overgrazing
 repair gullies
 terraces
 other (please describe)
Maintain healthy groundcover all season.

What techniques are used to prevent overgrazing or decline in the pasture resource?

- rotational/management intensive grazing
 rotate pastures with crops
 pasture renovation
 overseeding/reseeding
 liming/fertilization
 other (please describe) *Inoculate all legumes. Diversify pasture forages.*

Section 8 Notes

Pasture requirement and definition. Though any species of livestock may be placed on pasture, it is only required for ruminants. Pasture is specifically defined as “(l)and used for livestock grazing that is managed to provide feed value and maintain or improve soil, water, and vegetative resources.” [§205.2] Dry lots and pens do NOT constitute pasture and should not be assigned field numbers on Field History Sheets or maps. However, dry lots and pens should be designated on facility maps as George and Helen have done on theirs (see Map #2).

Buffers. There are several ways you can protect a field from contamination. Buffers are probably the most common. Traditionally, certifiers have accepted a buffer zone of 25 feet in width, but such details are not specified in the Regulations, only that contamination be prevented. Therefore, a 25-foot buffer might be perfectly adequate for crops adjacent to fields where chemicals are applied using ground rigs, but inadequate where aerial application is used.

When a buffer is required around pasture, a recessed fence is sometimes used. The buffer zone remaining can be used as a lane for moving farm equipment, a wildlife area, beneficial insect habitat or a windbreak. It can also be used for a harvestable crop, such as hay, though it may NOT be sold or used as an organic crop.

When the buffer is conventional hay or another harvestable crop, certifiers expect that you will establish procedures for cleaning or purging equipment before the harvest of organic production begins. Cleaning protocols should be written down and a log maintained to record who did the cleaning and when. You will also be expected to document how you use or sell the buffer harvest. Forms to assist in documenting cleanouts and the disposition of buffer crop harvests can be found in ATTRA’s *Organic Field Crops Documentation Forms*.

A buffer is not necessary when the adjoining land is not a potential contamination source. You will need to provide some evidence that this is the case. George and Helen have a letter in their application from their neighbor to the south confirming that the adjoining land is also organic (see Supplemental Documents), thereby justifying the absence of a buffer on the southern border.

Written notification. Another means for preventing contamination and ensuring integrity for organic crops is to notify road crews and utilities of your organic certification and arrange for management of brush, weed and grass control yourself. Draft copies of notification letters can be found in ATTRA’s *Forms, Documents, and Sample Letters for Organic Producers*.

No Spray signs. Certifiers like to see producers use these signs, especially along roadsides, utility rights-of-way and on fields abutting conventional production where a lot of custom spraying is done. For a list of vendors, ask for ATTRA’s *Sources of “Spraying Prohibited” Signs for Organic Farms*.

How do you ensure buffers are maintained between grazing areas and land not under organic management?

- recessed fence line do not spray signs isolation from conventionally managed land
- agreements with adjacent land owners/managers (*obtain documentation for inspectors*)
- agreements with road maintenance and utility crews (*obtain documentation for inspectors*)
- adjacent to certified organic farmland (*obtain documentation for inspectors*)
- other (*please describe*)

If ruminants are routinely denied access to pasture, please describe the circumstances and/or stages of production involved. Not applicable

Section 9: Manure Management

NOP Rule 205.239(a)(2)

Manure must be managed so that it does not contribute to contamination of crops, soil and water, and so that nutrients are recycled.

What type(s) of manure management do you use?

- spread immediately/as soon as possible stockpile outdoors stockpile indoors
- composting liquid no centralized accumulation of manure, e.g., year-round pasturing
- other (specify)

Do you apply manure and/or composted manure to your fields? Yes No

If yes, what is the approximate rate of application? Not applicable

3 T/A

If yes, how many acres of land are available for manure and/or compost application? Not applicable

226 a.

If yes, during what months do you apply manure/compost? Not applicable

Mostly April-June, and October-November.

If no, how do you ensure that the nutrients are recycled? Not applicable

List any materials added to manure or to manure compost (e.g., bedding, barn lime, inoculants, etc.) Not applicable

organic straw bedding, aglime

Does your manure handling ensure that no contamination of water resources occurs? Yes No

Section 9 notes

Applying manure to frozen soil? There is no specific provision in the NOP Regulations prohibiting manure application to frozen soil. However, §205.239(c) states that manure may not be managed in any way that contributes to contamination of soil, crops or water.

Ensuring nutrient recycling. Organic livestock producers must demonstrate that manure nutrients are recycled. [§205.239(c)] If you do not have sufficient cropland to spread your manure without causing pollution or other nutrient management problems, you must indicate how you address recycling of manure nutrients. Satisfactory options include, but are not limited to, giving or selling manure or composted manure to other farmers, landscapers or gardeners.

Manure and compost ingredients and additives. Note that quicklime and hydrated (slaked) lime are prohibited and cannot be used on manure returned to organic fields. Likewise, many synthetic pit additives would also be prohibited.

Producer must establish and maintain preventive livestock health care practices. When preventive practices and veterinary biologics are inadequate to prevent sickness, a producer may administer nonsynthetic and/or those synthetic medications allowed under §205.603 and retain organic status for the treated animal. Producers may not withhold needed treatment from a sick animal in order to preserve its organic status.

A. GENERAL INFORMATION

Identify the general components of your animal health management program including preventive and management practices:

- choosing well-adapted species
 selective breeding
 raise own replacement stock
 isolation for purchased/diseased animals
 culling
 vaccinations
 good sanitation
 access to outdoors
 dry bedding
 good ventilation in housing
 good quality feed
 pasture rotation
 nutritional supplements
 probiotics
 low-stress handling
 other (please specify)

B. LIST HEALTH OR DISEASE PROBLEMS IN THE LAST 12 MONTHS. INCLUDE VACCINATIONS AND PARASITICIDES GIVEN OR PLANNED:

No problems

Note: Synthetic hormones and antibiotics are prohibited in organic production.

HEALTH PROBLEM/DISEASE	ANIMAL ID	PRODUCT(S) USED (RETAIN LABELS FOR INSPECTOR)	APPROVED (A) PROHIBITED (P)
Bovine Brucellosis	0506301 thru 0515601	Brucellosis vaccine	A
Bovine Clostridial Diseases	0506301 thru 0515601	7-way clostridial vaccine	A
Bovine Leptospirosis	0506301 thru 0515601	Vibrio/Lepto-5 vaccine	A
Bovine Udder Inflammation	0307002 0310201	Acotinum, Bryonia, Arnica	A, A, A
Bovine Shriveled Udder	0211102	Chamomilla Dulcamara Rescue Remedy	A A A
Sheep Tetanus	s0509301 thru s0515404	CD&T vaccine	A
Pneumonia	s0509902 s0512103	Tetracycline Rescue Remedy	P A

attach additional sheet if needed

Please provide the name, address, and phone number of your veterinarian:

Dr. Phoebe Jones, Jones Veterinary Clinic, 7 Elm Circle,
Rivertown, PA 17012, tel: 570-867-1309

Section 10 notes

Treatment options and preserving organic status. You may not withhold medical treatment from any sick animal in order to preserve its organic status. [§205.238(c)(7)] This can be challenging since many standard medications, most notably antibiotics, are prohibited. Once an animal has been treated with a prohibited medication, it may NOT be sold as organic. As a viable option, many producers use allowed alternative medications and therapies, such as herbal preparations, homeopathics and probiotics. In our example, George and Helen's lamb s0509902 was given tetracycline to treat pneumonia. This animal and its products, such as wool, may no longer be sold as organic.

Vaccinations? Standard vaccinations and veterinary biologics are allowed in organic production. [§205.238(a)(6)]

More information on treating sick or injured animals in an organic system. See section XIX of NCAT's *Organic Livestock Workbook*.

Are your animals tested for specific diseases on a routine basis?

Yes No

If yes, what diseases are they tested for?

Cattle: brucellosis & TB.

If yes, how is the testing done? by yourself veterinarian state or federal official
 other (*please describe*)

C. PEST MANAGEMENT

(retain product labels and other documentation for all purchased pesticides, pest control materials, fumigants, sanitizing and medications for the inspector)

Indicate all livestock pest problems.

flies internal parasites external parasites predators others (*please describe*)

If flies are a problem, what prevention and control measures do you use?

Not a problem

sanitation/manure removal sticky tape bug zappers fans screening
 commercial fly parasites/predators walk-through fly traps
 allowed/restricted pesticides other (*please describe*)
baited fly traps; chickens in pasture reduce fly problems

If allowed or restricted pesticides are used, please list them.

If internal parasites are a problem, what prevention and control measures do you use?

Not a problem

controlled grazing multispecies grazing diatomaceous earth
 garlic or herbs probiotics allowed/restricted synthetic dewormers
 other (*please describe*)
chickens in pasture reduce parasite problems

If deworming, herbal or probiotic products are used, please list them.

How do you monitor livestock for internal parasites?

visual/body condition fecal analysis anaemia evaluation
 no monitoring is done other (*please describe*)

How often is monitoring done?

daily weekly monthly no monitoring is done other (*please describe*)
Daily, for visual checking; every three months for fecal floats.

If external parasites are a problem, what prevention and control measures do you use?

Not a problem

facility sanitation facility fumigation dust/mud wallows diatomaceous earth
 sulfur dusts allowed/restricted pesticides medications other (*please describe*)

Section 10 notes (continued)

Pest management in livestock. As with pest management in crops, control of livestock pests should begin with prevention, sanitation and similar measures, leaving allowed pesticides as a reserve measure. For more information see section XX of NCAT's *Organic Livestock Workbook*.

Baited fly traps. If you use baited fly traps, be sure the bait is either a non-synthetic, like rotting meat, or an allowed synthetic, such as ammonium carbonate.

Internal parasites and parasiticides. Some use of synthetic parasiticides, specifically ivermectin, has been allowed, but only as emergency treatment in dairy and breeder stock. Milk from producing animals may not be labeled organic for 90 days following such emergency treatment. Treatment in breeder stock may not occur during the last third of gestation or during lactation if the progeny is to be labeled organic. No animal treated with a synthetic parasiticide may be slaughtered and sold as organic.

It is not advisable to design your organic system to rely on synthetic dewormers of any type. For additional guidance in pursuing non-chemical alternatives, see ATTRA's *Integrated Parasite Management for Livestock*. You will also find useful information in section XX of NCAT's *Organic Livestock Workbook*.

If pesticidal products or medications are used, please list them.

Not applicable

How do you monitor for external parasites?

- visual inspection of animals visual inspection of facility no monitoring is done
 other (*please describe*)

How often do you monitor for external parasites?

- daily weekly monthly no monitoring is done other (*please describe*)

If predators are a problem, what prevention and control measures do you use?

Not a problem

- fencing bird netting guard animals traps noise makers repellents
 corral/lock up animals at night restrict grazing when predation is frequent
 artificial lighting hunting other (*please describe*)

a) If repellent or bait products are used, please list them.

Not applicable

b) If predation is a problem, do you take steps to ensure that your control measures do not harm other wildlife?

Yes No

D. PHYSICAL ALTERATIONS

Producers may only use physical alterations that promote the welfare of the livestock. Alterations must be done in a manner that minimizes pain and stress. NOP Rule 205.238 (a)(5)

List physical alteration practices you use:

none used

- castration dehorning ear notching tail docking branding removal of extra teats
 wing clipping beak trimming other (*specify*): *Ear tattoos.*

Please describe physical alteration practices as listed above:

ALTERATION PRACTICE	METHOD USED AND MEANS FOR REDUCING LIVESTOCK STRESS	REASON FOR ALTERATION PRACTICE
<i>Castration (sheep & cattle)</i>	<i>banding, done as soon after birth as possible</i>	<i>Reduces aggressiveness among non-breeding males</i>
<i>Dehorning (cattle)</i>	<i>dehorning iron, done as soon after birth as possible</i>	<i>Reduces injury among stock.</i>
<i>Tail docking (sheep)</i>	<i>surgical, done as soon after birth as possible</i>	<i>Reduces incidence of sanitary-related diseases</i>
<i>Ear tattoos (sheep & cattle)</i>	<i>tattooing tool, done as soon after birth as possible</i>	<i>Identification</i>

attach additional sheet if needed

Section 10 notes (continued)

Predator management. For information on how to deal with predators effectively, legally and ecologically, see section XXII of NCAT's *Organic Livestock Workbook*, ATTRA's *Predator Control for Sustainable and Organic Livestock Production* and *Biodiversity Conservation: An Organic Farmer's Guide*. This document is available from the Wild Farm Alliance, PO Box 2570, Watsonville, CA 95077. It can also be downloaded from their Web site at www.wildfarmalliance.org.

Justifying physical alterations. Do not assume that physical alterations generally used in conventional livestock production can be routinely employed on an organic operation. Physical alterations must only be performed "...as needed to promote the animal's welfare and in a manner that minimizes pain and stress." [§205.238(a)(5)] It is important, therefore, that you justify any practices you use and explain what you do to reduce stress and pain. See section XVIII of NCAT's *Organic Livestock Workbook* for more information.

Ear tattoos and ear tags. Ear tags and tattoos may or may not be viewed as physical alterations by your certifier. George and Helen's certifier believes that tattoos are a form of physical alteration and wants them to justify their use in the livestock plan. If you use these forms of animal ID, contact your certifier to learn their policy.

Slaughter facilities must be certified in order to sell meat as certified organic.

Where are your livestock slaughtered?

Not applicable

No slaughter on-farm processing facility other (*specify*)

If poultry is processed on-farm, describe slaughter and processing procedures:

Not applicable.

If livestock are processed off-farm, give the name of the facility where animals are slaughtered, along with the contact person, address and phone number.

*Foster's Abattoir & Locker Plant, Harold Foster, 1219 Service Rd.,
Rivertown, PA 17012, tel: 570-867-2309*

List the types of livestock you have slaughtered at the facility.

Lamb and dairy beef

Is the facility certified organic?

Yes No

If yes, by what agency? (*retain proof of certification for inspector*)

Penn State Organic Certifiers

Please describe how animal stress and injury is minimized during loading, transport, unloading and slaughter:

We use low-stress handling techniques as taught at Brad Williams Stockmanship School

How are organic meat products stored?

distributed immediately/no storage storage at slaughter plant storage at farm site
 storage at separate facility other (*please describe*)

If products are stored with or near nonorganic products, what steps are taken to ensure commingling does not occur?

Processor has protocols in place to prevent commingling.

Sections 11, 12, 13 and 14 notes

Slaughter, milk, egg and fiber handling plans. Sections 11 through 14 deal primarily with the sale, transportation and delivery of livestock and unprocessed livestock products to a handler. These activities are similar to postharvest handling in crop production and do NOT require you to prepare and submit a separate application as a handler or processor. However, several questions DO address processing and other value-added activities that indicate the need for you to complete a separate handling plan.

In our example, George and Helen do not slaughter their own animals and do not package their own meat products. They do arrange for a slaughter service through Foster's Abattoir, but are not responsible for the processing or the payments to the processor. Therefore, they do not need to submit a separate handling plan for livestock slaughter.

George and Helen ARE required to submit a handling plan application for their egg operation, because they candle, grade, label and pack their product. This separate but very simple handling plan is appended to their application and follows the livestock plan in this publication.

Handling usually involves processing. Processing is defined as "cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling or otherwise manufacturing and includes the packaging, canning, jarring or otherwise enclosing food in a container." [§205.2] In most instances, if any processing is done, and it adds value to the raw product, a handling plan will be required by the certifier. When in doubt, talk to your certifier.

Labels. If you are using labels for any of your livestock products, include copies with your application.

For more information. See sections XXVI and XXVII of NCAT's *Organic Livestock Workbook*.

Organic dairy operations must meet all applicable federal and state regulatory sanitation requirements. All inputs for sanitation must be allowed and verifiable. Equipment sanitizers must present no risk of contamination. Retain labels for all cleaners, sanitizers, teat dips and other products for inspection.

Please indicate type of milk handling systems you use.

Not applicable

- pipeline automated step saver hand milking parlor tie stalls
 stanchions other (specify):

How are you licensed?

- Grade A Grade B other (specify):

Describe cleaning cycle for milking equipment (water temperature, number of rinses, type of cleaning materials, etc.):

Equipment is cleaned with detergent, acid and sanitizer, followed by a clear hot water rinse after each milking. Water temperature: 140°F.

Detergent name: Ultima Acid cleaner name: DCC Phosphoric Acid

Sanitizer name: Sani-Way 12

Is cleaning followed by a clear water rinse?

Yes No

Please specify products used to clean animals:

- None used Teat dips (specify name): Laura's Pure Lanolin Teat Dip Udder wash (specify name) other (specify):

If you have a split operation, or have conventional milking animals in your herd, how do you ensure that the conventional milk does not commingle with organic milk?

Not applicable

Before being culled from the herd, any milker that loses organic status is milked last. The line is diverted at the station in the parlor and the milk is collected in pails. It is then fed to the barn cats and the dogs or otherwise discarded.

Section 13: Egg Handling and Packing Plan

Organic egg operations must meet all applicable federal and state regulatory requirements. Facilities that handle eggs must be inspected and certified to verify that organic integrity is maintained. All inputs for animal sanitation must be allowed and verifiable. Equipment sanitizers must present no risk of contamination. Depending on the nature of your packing operation, you may be required to submit a separate handling plan.

Where are eggs packed?

Not applicable

- on-farm off-farm packing facility other (specify)

If eggs are processed at an off-farm facility, list the name of facility, address, phone number and contact person:

Not applicable.

Is the facility certified organic?

Yes No

If yes, by what agency: (retain proof of certification for inspector)

Not applicable.

If eggs are processed on-farm, indicate the type of packaging used:

Paper egg cartons

If you have a split operation, how do you ensure that organic and conventional eggs do not commingle?

Not applicable.

Not applicable

How is wool or hair handled after shearing? Not applicable

- Sold as organic unprocessed wool/hair
- Wool/hair sold/disposed of as nonorganic
- Processed on-farm for organic product sales (organic handling plan needed)
- Processed on-farm for nonorganic product sales

What steps do you take to ensure that organic wool/hair does not commingle with conventional products?

We do our own shearing. Only our organic sheep are sheared on-site. Any sheep that lose organic status, if not culled in time, are sheared last and the wool is immediately separated and used as garden mulch. Buyer picks up wool at the farm.

Are any cleaning or treatment products used on the unprocessed wool/hair? Yes No

If yes, please list. *Not applicable.*

Are the bags or other containers used to hold unprocessed wool/hair free of fungicides, insecticides or other prohibited contaminants? Yes No

Individual animal ID for slaughter and dairy. Flock identification for poultry is required. Separation and identification are required for those animals that have been treated with prohibited products.

Describe your identification system: collars flock ID number ear tags tattoos

leg bands branding other (specify) *Cattle and sheep have both ear tags and ear tattoos. Chickens have color-coded leg bands.*

Do you assign numbers and/or letters as part of your animal ID system?

Yes No

If yes, give an example and explain the components of your ID numbers.

Example: s0509301

s=sheep, 05=year of birth (2005), 093=Julian calendar birth date, 01=order of birth on that date

Are any animals treated with prohibited materials?

Yes No

Only when required for humane medical reasons.

If yes, how are the animals identified and segregated?

Notations are immediately made in the livestock records. Treated animals are culled soon after treatment by selling into the conventional marketplace.

If the entire poultry flock is treated with prohibited materials, what changes do you make to ensure that this flock is not sold as organic?

Entire flock would be segregated and culled as soon as possible by selling them as conventional birds.

Section 16: Marketing and Labeling

How are meat products marketed/sold?

Not applicable

live animal sale wholesale retail other (please describe)

How is milk marketed/sold?

Not applicable

wholesale retail processed on-farm other (please describe)

How are eggs marketed/sold?

Not applicable

wholesale retail other (please describe)

How are fiber products marketed/sold?

Not applicable

wholesale retail processed on-farm other (please describe)

Do you use or plan to use the USDA Organic Seal on organic product labels or market information?

Yes No

Do you use or plan to use the seal of the certifying agent on product labels or market information?

Yes No

attach all organic product labels See attached.

Section 15 notes

The importance of animal identification. Livestock identification is critical to document the segregation of nonorganic animals from those that are organic. In George and Helen's operation, the nonorganic animals include purchased breeding stock and the occasional animals that have received antibiotics or other prohibited medicines when sick or injured.

The ID system need not be complex, especially on small farms where each animal may be easily known by the manager. What is important is your ability to segregate nonorganic stock and to demonstrate this ability to the inspector. It is also important as a means of ensuring traceability in the event that there is a consumer problem with one of your products and it is necessary to determine which animals were involved.

Livestock ear tags. If you make use of ear tags, be certain that they are NOT impregnated with prohibited pesticides.

Section 16 notes

Labeling organic products. There are a lot of specifics on organic labeling in the NOP Regulations. Subpart D (§§205.300 through 205.311) addresses these and should be studied closely before designing a label. A quick summary of critical labeling issues can be found in section XXVII of NCAT's *Organic Livestock Workbook*.

Attaching labels to your application. Certifiers like to see mock-ups of labels in advance, even if they are hand-drawn. It is wise to include them with your application as opposed to waiting for the inspector. Note that George and Helen have done so—including the labels for their egg cartons. (See the handler plan, attached.)

Use of the USDA and certifier seals. Use of either USDA or certifier seals is optional. However, it is important for the certifier to know whether you choose to use them on your labels. There are quite a few specific requirements regarding labeling (§§205.300–205.311) that he or she will want to review and make certain you are in compliance with.



Records must disclose all activities and transactions of the operation, be maintained for five years and demonstrate compliance with the NOP Rule. All records must be accessible to the inspector.

A. RECORDS

Note which types of records you keep:

ORGANIC RECORDS	DESCRIPTION
X	Documentation of purchased animals
X	Breeding records
X	Purchased feed and/or feed supplements
X	Feed labels
X	Organic certificates for purchased feed
X	Organic certificate for purchased organic animals
	For first time certification of animals: feed records verifying 100 percent organic feed for one year
X	Health records (vaccines, medications, physical alterations, etc.)
X	Feed storage
X	Milk production
X	Meat slaughter records
X	Egg collection records
X	Egg packing records
X	Nonorganic livestock, livestock production and sales records
X	Sales
X	Shipping and receiving records, bills of lading, etc.
	Other (describe)
	Other (describe)

Do you use lot numbers for any products?

Yes No

If yes, give an example of your lot number and explain what each component means.

Used for eggs: 06095. 06 = year (2006); 095 = Julian calendar date (April 5th)

Are/will records be maintained for at least five years?

Yes No

Section 17 notes

Recordkeeping. It should be clear by this time that you will need to document everything you claim you are doing to comply with the NOP Regulations. You will explain this in your application, which is also your Organic System Plan. The task may seem daunting. But good farmers and ranchers already keep most of those records as a tool for assessing their systems and making decisions. If you already have a good system in place, be sure to use it. Take a look at ATTRA's *Organic Livestock Documentation Forms* for further ideas.

Audit trail. Perhaps the most important indicator that your recordkeeping system is adequate is that it provides a clear audit trail for organic products from field to final sale or use. In other words, if the purchaser or a regulator were to inquire about a particular package of meat or carton of eggs, you would have the documentation to trace it back to a specific animal, group or flock and provide relevant history.

Describe all prohibited substances and practices

 Not applicable

PROHIBITED SUBSTANCE OR PRACTICE	TYPE OF LIVESTOCK	WHERE/WHEN USED

attach additional sheet if needed

Describe measures taken to prevent the commingling of organic and nonorganic livestock and livestock products (animal ID, audit trail, segregation, etc.).

Not applicable

Describe measure taken to prevent organic livestock and livestock products from contamination by prohibited substances.

Not applicable

Section 19: Affirmation

I affirm that all statements made in this application are true and correct. I understand that the operation may be subject to unannounced inspection and/or sampling for residues at any time as deemed appropriate to ensure compliance with the Organic Foods Production Act of 1990 and National Organic Program Rules and Regulations. I understand that acceptance of this questionnaire in no way implies granting of certification by the certifying agent. I agree to provide further information as required by the certifying agent.

Signature of Operator George Smith Date 2/12/06

I have attached the following documents:

- Maps of the operation (including buildings and pasture/grazing areas and showing adjoining land use and identification)
Attached to the Farm Update Form
- Field History Sheet (be sure to list pastures on Field History Sheets provided) *Attached to the Farm Plan Update Form*
- Water test
- Input product labels, if applicable
- Organic product labels, if applicable *Attached to the Handler Application Form*
- Other
- I have made copies of this questionnaire and other supporting documents for my own records.

Submit completed form, fees, and supporting documents to:

Lehigh Valley Organic Certifiers
P.O. Box 28
Shelby, PA 17001

Section 18 notes

Split operations. A split operation is defined as one “that produces or handles both organic and nonorganic agricultural products.” [§205.2] An organic livestock operation that only has conventional animals for breeding purposes or because of occasional prohibited medical treatments is NOT generally considered to be a split operation. However, your certifier may have a different policy. Be certain to learn the expectations of your certifier if you have or plan to have nonorganic livestock on your operation.

Commingling is defined as “(p)hysical contact between unpackaged organically produced and non-organically produced agricultural products during production, processing, transportation, storage or handling, other than during the manufacture of a multi-ingredient product containing both types of ingredients.” [§205.2]

Must organic and conventional livestock be segregated? Not usually. However, you must demonstrate that your animal ID system and audit control ensure that conventional products, such as meat, milk, wool and more, will not commingle with organic products. You must also demonstrate that the presence and use of prohibited substances and practices will not contaminate organic livestock, crops or soil. For example, proper treatment of conventional livestock with antibiotic injections or oral worming drenches do not present an obvious contamination to an organic system. However, spraying those animals with prohibited insecticides presents problems from spray drift to the ground, facilities and nearby organic animals. Also, sprayed animals might rub the insecticide onto organic animals if in proximity. Such circumstances would likely call for separate facilities and at least temporary segregation of stock.

Section 19 notes

Make copies. Do NOT forget to make copies of your complete application, including all attachments. You are required to keep a copy of the document and there is always the risk that the original document might get lost. You can save yourself a lot of time and frustration should a loss occur.

Special delivery? Ask your certifier whether you should send your application or other documents in a manner that requires a signature for delivery. Some may prefer the security and documentation this provides.

Handling Plan Application

Because George and Helen candle, grade, label and package their eggs, they must submit a complete handling plan, in addition to any information they may already have provided in the livestock plan application. A copy of their completed plan follows. Because small-scale egg packing is a relatively simple process, this document is short and there are few notes.

Lehigh Valley Organic Certifiers

Organic Handling Plan

Please fill out this questionnaire if you are requesting organic handling certification. This form or an update short form may be used for continuation of certification. Attach an Organic Product Profile sheet for each product requested for certification, and a current schematic product flow chart and facility map for each facility that will handle organic products. Use additional sheets if necessary.

SECTION 1: General Information				NOP Rule 205.201 and 205.401	
Applicant/company name <i>Maple Knoll Farm</i>			Organic certification number <i>D087</i>		
Owner/manager <i>George & Helen Smith</i>		Primary contact person <i>George Smith</i>		For office use only	
Address <i>423 Sandpiper Rd.</i>				Date received	
				Date reviewed	
City <i>Shelby</i>				State/province <i>PA</i>	
				Postal/zip code <i>17001</i>	
Country <i>U.S.A.</i>				Reviewer initials	
				Fees received	
Inspector					
Legal status: <input checked="" type="checkbox"/> Sole proprietorship <input type="checkbox"/> Corporation <input type="checkbox"/> Cooperative <input type="checkbox"/> Trust or non-profit <input type="checkbox"/> Legal partnership (federal form 1065) <input type="checkbox"/> Other (specify)					
Year company began <i>1972</i>	Number of employees <i>1 (outside of family)</i>	Name of person overseeing organic production <i>George Smith</i>	Government permits/licenses <i>Lic # 00075389b (for egg handling)</i>		
Do you have a copy of current organic standards? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			Do you understand the current organic standards? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Do you have a copy of the current National List? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
What general categories of organic products are manufactured or planned to be manufactured? <i>Provide a complete list of products requested for certification in Section 2: Product Composition and Labeling.</i> <i>Eggs, packaged.</i>					
List all noncompliances from last year's certification and state how the noncompliances have been addressed. <input type="checkbox"/> Not applicable <i>No noncompliances in the handling component of the farm.</i>					
List previous years certified organic and name of certifying agent. <i>1991-2000, Penn State Organic Certifiers</i>			List current organic certification by other agents. <i>None.</i>		
Has certification ever been denied, suspended, or revoked? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, describe the circumstances. <i>Attach a description of the actions taken to correct noncompliances.</i> <i>Not applicable</i>					
Preferred time for inspection visit: <input checked="" type="checkbox"/> Morning <input checked="" type="checkbox"/> Afternoon <i>Any weekday, Monday through Friday</i> Give directions to the processing facility. <i>Our farmstead and the processing unit are on the west side of Sandpiper Rd., ¾ mile north of the junction with Co. Rd. 12 in Shelby. Sign is attached to mailbox.</i>					
Type of processing/handling operation, e.g. grain cleaning, canning, freezing <i>Egg packaging & labeling.</i>		Is your operation a: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> Contract vendor		Estimated annual total production <i>100 % organic 0 % nonorganic</i> <i>3200—4200 dozen eggs expected</i>	
IF YOU USE CONTRACT VENDORS, GIVE THE FOLLOWING INFORMATION:					
NAME OF CONTRACT VENDOR	ADDRESS	PHONE NO.	CERTIFIED BY		
<i>None</i>					
List or attach a list stating the general categories of nonorganic products produced by your company. <i>None</i>					

Handling plan notes

An example. Because George and Helen candle, grade, label and package their eggs for sale, they are required to complete and submit a handling plan as part of their application for certification. This publication will not address the details of how to complete a handling plan, but we wanted to show you that most value-added activities on an organic farm operation will meet the definition of handling, and the handling plan will then be required.

Documentation of activities and inputs will be required for the handling operation as it is for production farming operations. In addition, further fees are typically charged when applying for certification as a handler.

To assist in assessing the compliance of your handling operation with the NOP Regulations, see ATTRA's *National Organic Program Compliance Checklist for Handlers*.

Supporting documents. George and Helen have provided four supporting documents typically required with a handler plan: (1) facility map; (2) production flowchart; (3) product profile form(s); (4) product label(s).

End of handling plan notes

The NOP Rule has 4 categories of products which can use the word *organic*. These are *100 percent organic*, *organic, made with organic (specified ingredients or food group(s))*, and products with less than 70 percent organic ingredients. The percentage of organic ingredients is calculated by dividing the total net weight or volume (excluding salt and water) of combined organic ingredients by the total weight or volume of all ingredients (excluding salt and water). All ingredients identified as *organic* in the ingredient list must be certified by an accredited certifying agent. Ingredients sourced from non-certified exempt or excluded operations must not be identified or used as organic ingredients.

Products labeled *100 percent organic* must contain 100 percent organic ingredients, including processing aids. Products labeled *organic* must contain at least 95 percent organic ingredients; nonorganic ingredients must not be commercially available in an organic form; and all synthetic ingredients and processing aids must be on the National List. Products labeled *made with organic (specified ingredients or food group(s))* must contain at least 70 percent organic ingredients. For *100 percent organic, organic* and *made with ...* products, both organic and nonorganic ingredients must not be produced using excluded methods, sewage sludge or ionizing radiation. Products labeled *organic* or *made with...* must not include organic and nonorganic forms of the same ingredient, except that a nonorganic ingredient in a product labeled *made with...* may contain organic and nonorganic forms of the same ingredient, but the ingredient must not be labeled as *organic* on the ingredient statement or be counted in the calculation of the product's organic percentage. Products with less than 70 percent organic ingredients can only identify the organic ingredients in the information panel. Refer to the National List, Section 205.605 and 205.606, to determine which nonagricultural substances and nonorganically produced agricultural ingredients are allowed in or on products labeled *organic* or *made with...*

The NOP Rule has specific requirements for principal display panel information relating to the use of the term *organic*, depending on the percentage of organic ingredients in the finished product. For all products, the organic ingredients must be identified in the ingredient information panel. Up to three ingredients or food groups can be listed on the principal display panel for products labeled as *made with organic (ingredients or food group(s))*. The term *organic* cannot be used to describe a nonorganic ingredient in a product name. Water and salt cannot be identified as *organic*. The name of the certifying agent must be identified on the information panel below the name of the handler or distributor, preceded by the statement, *Certified organic by...* or similar phrase. The address and telephone number of the certifying agent may be displayed.

The USDA seal can be used on *100 percent organic* or *organic* products, but not on products labeled *made with...*. A certifying agent's seal, logo or other identifying mark can be used on *100 percent organic, organic* or *made with...* Products with less than 70 percent organic ingredients cannot use either the USDA seal or the certifying agent's name, seal or logo. The certifying agent's seal cannot be displayed more prominently than the USDA seal.

Attach an Organic Product Profile sheet and examples of all labels used for each product requested for certification.

A. PRODUCTS LABELED AS 100 PERCENT ORGANIC (All ingredients are certified 100 percent organic, including processing aids.)

List all products labeled or planned to be labeled as *100 percent organic* and check appropriate boxes. None

NAME OF PRODUCT	ORGANIC INGREDIENTS IDENTIFIED IN INFORMATION PANEL (✓)	CERTIFYING AGENT NAME IDENTIFIED ON LABEL (✓)	USE USDA SEAL ON LABEL (✓)	USE CERTIFYING AGENT SEAL/LOGO ON LABEL (✓)
Maple Knoll Farm 100% Organic Free-Range Eggs	Eggs	Lehigh Valley Organic Certifiers	✓	

B. PRODUCTS LABELED AS ORGANIC (at least 95 percent certified organic ingredients)

List all products labeled or planned to be labeled as *organic* and check appropriate boxes. None

NAME OF PRODUCT	ORGANIC INGREDIENTS IDENTIFIED IN INFORMATION PANEL (✓)	CERTIFYING AGENT NAME IDENTIFIED ON LABEL (✓)	USE USDA SEAL ON LABEL (✓)	USE CERTIFYING AGENT SEAL/LOGO ON LABEL (✓)

SECTION 2: Labeling and Product Composition B. PRODUCTS LABELED AS *ORGANIC* (continued) *Not applicable*

Are any nonorganic agricultural ingredients used? Yes No

If yes, list all organic products which contain nonorganic agricultural ingredients.

If yes, describe your attempts to source organic ingredients.

Are sulfites, nitrates or nitrites added during the production or handling process? Yes No

If yes, list all organic products produced with sulfites, nitrates or nitrites.

Do any products labeled *organic* show the percentage of organic ingredients on the label? Yes No

If yes, list all products so labeled.

Does the size of the percentage statement exceed one-half the size of the largest type size on the panel on which the statement is displayed? Yes No

Does the percentage statement appear in its entirety in the same type size, style and color without highlighting? Yes No

Is the percentage rounded down to the nearest whole number? Yes No

C. PRODUCTS LABELED AS *MADE WITH ORGANIC (SPECIFIED INGREDIENTS OR FOOD GROUP(S))*

(At least 70 percent certified organic ingredients; up to 3 ingredients or food groups can be listed)

List all products to be labeled *made with organic (ingredients or food group(s))* and check appropriate boxes. None

NAME OF PRODUCT	HOW MANY INGREDIENTS OR FOOD GROUPS ARE LISTED ON THE LABEL?	LIST EACH INGREDIENT OR FOOD GROUP ¹ SHOWN ON THE PRINCIPAL DISPLAY PANEL	ORGANIC INGREDIENTS IDENTIFIED IN INFORMATION PANEL (✓)	CERTIFYING AGENT NAME IDENTIFIED ON LABEL (✓)	CERTIFYING AGENT SEAL/LOGO ON LABEL (✓)

Does the *made with organic ingredients* statement on the principal display panel exceed one-half the size of the largest type size on the panel? Yes No

Does the *made with organic ingredients* statement on the principal display panel appear in its entirety in the same type size, style and color without highlighting? Yes No

Do any products labeled *made with organic ingredients* show the percentage of organic ingredients in the product? Yes No

If yes, does the size of the percentage statement exceed one-half the size of the largest type size on the panel on which the statement is displayed? Yes No

Does the percentage statement appear in its entirety in the same type size, style and color without highlighting? Yes No

Is the percentage rounded down to the nearest whole number? Yes No

D. PRODUCTS WITH LESS THAN 70 PERCENT ORGANIC INGREDIENTS (organic ingredients listed only on the information panel)

List all products which contain less than 70 percent organic ingredients. None

¹Choose from the following food group listings: beans, fish, fruits, grains, herbs, meats, nuts, oils, poultry, seeds, spices, sweeteners, vegetables or processed milk products.

SECTION 2: Labeling and Product Composition (continued)

E. BY-PRODUCTS

Will any by-products from certified organic products be sold as certified organic? Yes No Not applicable

If yes, list all organic products manufactured from by-products.

*Include information on organic by-products as applicable on this Organic Handling Plan.
Attach an Organic Product Profile sheet for each product.*

F. WATER

Check ways water is used in processing:

None used

- ingredient processing aid cooking cooling product transport cleaning organic products
 cleaning equipment other (specify)

Source of water: municipal on-site well other, specify

Does the water meet the Safe Drinking Water Act?

Yes No

Attach copy of water test, if applicable. Copy attached to livestock plan.

What on-site water treatment processes are used?

None

Is steam used in the processing or packaging of organic products?

Yes No

If yes, describe how steam is used.

If steam has direct contact with organic products, do you use:

No direct contact

- steam filters condensate traps testing of condensate testing of finished products
 other (specify)

List products used as boiler additives. *Not applicable.*

No boiler additives used

Attach Material Safety Data Sheet (MSDS) and/or label information for boiler additives, if applicable.

Describe how you monitor water quality.

Water tests for coliforms and chlorine.

How often do you conduct water quality monitoring? weekly monthly annually as needed

other (specify)

SECTION 3: Assurance of Organic Integrity

NOP Rule 205.201(a), 205.270 and 205.272

NOP Rule requires that handling practices and procedures present no contamination risk to organic products from commingling with nonorganic products or contact with prohibited substances. Packaging materials, bins and storage containers must not have contained synthetic fungicides, preservatives or fumigants. Reusable bags or containers must be clean and pose no risk to the integrity of organic products. Procedures used to maintain organic integrity must be documented.

A. PRODUCT FLOW

Attach a complete written description or schematic product flow chart which shows the movement of all organic products, from incoming/receiving through production to outgoing/shipping. Indicate where ingredients are added and/or processing aids are used. All equipment and storage areas must be identified. See attached.

B. ORGANIC INTEGRITY

Do you have an organic integrity program in place to address areas of potential commingling and/or contamination?

Yes No

If yes, list specific control points you have identified in your process and state how you have addressed them to protect organic integrity, or attach a copy of your organic integrity program.

We handle only organic eggs produced on our farm. We have a clear understanding that no prohibited substances are allowed within the egg room except when floor cleaning is required.

If no, do you have plans to implement an organic integrity program?

Yes No

C. MONITORING

Do you have a Quality Assurance program in place?

Yes No

If yes, what program do you use? ISO HACCP TQM other (specify) *Self-policing*

Are any outside quality assessment services used (e.g. AIB)?

Yes No

If yes, name of company

SECTION 3: Assurance of Organic Integrity C. MONITORING (continued)

Product testing: (Check all that apply)

- ingredients tested prior to purchase ingredients tested upon receipt products tested during production
 finished products tested other (specify) *We use the eggs ourselves and monitor for quality.*

How do you prevent the use of ingredients produced using excluded methods (genetic engineering), sewage sludge or ionizing radiation? (Check all that apply)

- GE testing letters from manufacturers other (specify) *Organic eggs are only ingredient and are produced under our control.*

Are ingredient samples retained? *Not applicable.*

Yes No

If yes, how long?

Are finished product samples retained?

Yes No

If yes, how long?

Do you have a product recall system in place?

Yes No

D. EQUIPMENT

List all equipment used in processing. *Not applicable.*

EQUIPMENT NAME	CAPACITY	CHECK IF EQUIPMENT IS CLEANED PRIOR TO ORGANIC PRODUCTION (✓)	CHECK IF CLEANING IS DOCUMENTED (✓)	CHECK IF THE EQUIPMENT IS PURGED PRIOR TO ORGANIC PRODUCTION (✓)

If equipment is purged, list and describe purge procedures, quantities purged and documentation.

E. SANITATION

Attach MSDS and/or label information for cleaning and sanitizing products, if applicable.

Check all cleaning methods used:

- sweeping scraping vacuuming compressed air manual washing clean in place (CIP)
 steam cleaning sanitizing other (specify)

Provide information on your cleaning program and products used.

AREA	TYPE OF CLEANING	CLEANING EQUIPMENT USED	PRODUCTS USED	FREQ	CHECK IF CLEANING IS DOCUMENTED (✓)
Receiving area					
Ingredient storage					
Product transfer					
Production area					
Production equipment					
Packaging area	<i>Sweeping, mopping, wiping surfaces</i>	<i>Broom, mop, sponges, paper towels</i>	<i>Sani-Way 12, (chlorine-based sanitizer)</i>	<i>daily</i>	✓
Finished product storage	<i>wiping surfaces</i>	<i>sponges, paper towels</i>	<i>Sani-Way 12, (chlorine-based sanitizer)</i>	<i>weekly</i>	✓
Loading dock					
Building exterior					
Accidental spills					
Other (specify)					

SECTION 3: Assurance of Organic Integrity (continued)

Are all surfaces that contact organic products food grade? Yes No

Do you test food contact surfaces or rinsate for cleaner/sanitizer residues? Yes No

Where are cleaning/sanitizing materials stored?

In cabinet immediately outside of the egg packaging room.

F. PACKAGING

Check types of packaging material used: paper cardboard wood glass metal foil
 plastic waxed paper aseptic natural fiber synthetic fiber other (specify)

Where are packaging materials stored?

In one end of the egg packaging room.

Are any fungicides, fumigants or pest control products used in this storage area? Yes No

If yes, describe use and list specific products.

Sticky traps of various types to catch any mice or insect pests.

Have any packaging materials been exposed to synthetic fungicides, preservatives or fumigants? Yes No

If yes, describe exposure, including name of products used.

Are packaging materials reused? Yes No

If yes, describe how reusable packaging materials are cleaned prior to use.

G. STORAGE

Provide information on your storage areas by completing the following table.

USE	LOCATION	TYPE/CAPACITY	IDENTIFICATION NAME OR NUMBER	IS STORAGE UNIT DEDICATED ORGANIC?	COMMENTS ON POTENTIAL FOR CONTAMINATION OR COMMINGLING PROBLEMS
Ingredient storage					
Packaging material storage	<i>Egg packaging room</i>	<i>Pallet</i>	<i>Not applicable</i>	<i>Yes</i>	<i>Possible during floor cleaning, but steps are taken to prevent it.</i>
In-process storage					
Finished product storage	<i>Egg packaging room</i>	<i>Refrigerator</i>	<i>Not applicable</i>	<i>Yes</i>	<i>Refrigerator used only for organic egg storage. No hazards.</i>
Off-site storage*					
Other (specify)					

*If there is off-site storage, give name, address, phone number, contact person and type of products stored at off-site facility.

H. TRANSPORTATION OF ORGANIC PRODUCTS *Not applicable.*

Incoming:

In what forms are incoming products received?

- dry bulk liquid bulk tote bags tote boxes metal drums cardboard drums paper bags
 foil bags other (specify)

How are incoming products transported?

Do you arrange incoming product transport?

Yes No

If you use transport companies, have they been notified of organic handling requirements?

Yes No

Are transport units used to carry nonorganic products or prohibited substances?

Yes No

If yes, how do you ensure that inbound transport units are cleaned prior to loading organic products?

Is the inspection/cleaning process documented?

Yes No

Are organic products shipped at the same time as nonorganic in the same transport units?

Yes No

If yes, check all steps taken to segregate organic products:

- use of separate pallets pallet tags identifying *organic* organic product shrink-wrapped
 separate area in transport unit organic product sealed in impermeable containers
 other (specify)

In-Process:

How are in-process products transported?

Not applicable.

How do you ensure that in-process transport units are cleaned prior to loading organic products?

Not applicable.

Is the inspection/cleaning process documented?

Yes No

Outgoing Finished Product:

In what form are finished products shipped? *Not applicable. Retailed from farm.*

- dry bulk liquid bulk tote bags paper bags foil bags metal drums cardboard drums
 mesh bags cardboard cases plastic crates other (specify)

How are outgoing products transported?

Not applicable.

Do you arrange outgoing product transport? *Not applicable.*

Yes No

If you use transport companies, have they been notified of organic handling requirements?

Yes No

Are transport units used to carry nonorganic products or prohibited materials?

Yes No

If yes, how do you ensure that outgoing transport units are cleaned prior to loading organic products?

Not applicable.

Is the inspection/cleaning process documented?

Yes No

Are organic products shipped at the same time as nonorganic in the same transport units?

Yes No

If yes, check steps taken to segregate organic products: *Not applicable.*

- use of separate pallets pallet tags identifying *organic* organic product shrink-wrapped
 separate area in transport unit organic product sealed in impermeable containers other (specify)

SECTION 4: Pest Management

NOP Rule 205.271

NOP Rule requires management practices to prevent pests, such as removal of pest habitat, food sources and breeding areas, and prevention of access to handling facilities. Environmental factors, such as temperature, light, humidity, atmosphere and air circulation, may be used to prevent pests. Pests may be controlled using mechanical or physical means such as traps, light or sound. Lures and repellents may be used if they do not contain prohibited substances or products produced using excluded methods (genetically engineered). If these measures are not effective, a synthetic substance not on the National List may be used provided the certifying agent approves use of the substance, method of application and measures taken to prevent contact with ingredients or organic products. Use of pest control products must be documented and included as part of the Organic Handling Plan.

Attach a facility map showing the location of traps and monitors, and submit MSDS and/or label information for substances used for pest control, if applicable.

What type of pest management system do you use?

- in-house: name of responsible person *George Smith*
- contract pest control service: name, address, phone number

Check all pest problems you generally have:

- flying insects
- crawling insects
- rats
- mice
- spiders
- birds
- other (specify)

Check all pest management practices you use:

- good sanitation
- removal of exterior habitat/food sources
- clean up spilled product
- exclusion
- sealed doors and/or windows
- repair of holes, cracks, etc.
- screened windows, vents, etc.
- physical barriers
- sheet metal on sides of building exterior
- mowing
- air curtains
- air showers
- positive air pressure in facility
- monitoring
- incoming ingredient inspection for pests
- inspection zones around interior perimeter
- ultrasound/light devices
- release of beneficials
- sticky traps
- electrocutors
- pheromone traps
- mechanical traps
- scare eye balloons
- freezing treatments
- heat treatments
- vacuum treatments
- carbon dioxide
- nitrogen
- vitamin baits
- pyrethrum
- ryania
- rotenone
- boric acid
- disodium octal tetrahydrate
- diatomaceous earth
- precipitated silica
- fumigation
- fogging
- crack and crevice spray
- other (specify)

Are records kept of your pest monitoring activities?

Yes No

Check all aspects of your waste management system that apply:

- on-site dumpster
- material recycling
- daily pickup of waste
- composting
- field application of waste
- other (specify)

Does your waste management system provide habitat and/or food sources for pests?

Yes No

If yes, please describe.

Pesticide use information for the last 12 months:

SUBSTANCE	TARGET PEST	LOCATION WHERE USED	METHOD OF APPLICATION	DATE OF LAST APPLICATION

Are records kept of all pesticide applications?

None used to date

Yes No

If a pest control substance is used, list all measures taken to prevent contact with organic products, ingredients or packaging materials.

Not applicable.

Are any substances used that are prohibited according to the National List?

Yes No

If yes, did you contact the certifying agent for prior approval before using?

Yes No

If prohibited pest control products were used, what measures are you taking or planning to take to prevent their use in the future?

Not applicable.

Are there any substances intended for use which are not listed above?

Yes No

If yes, list substances intended for use:

NOP Rule requires that records disclose all activities and transactions of the operation be maintained for 5 years and demonstrate compliance with the NOP Rule. Organic products must be tracked from receipt of incoming ingredients to sale of finished products. Organic ingredients must be verified as certified organic. Amounts of organic finished products must balance with certified organic ingredients purchased. All relevant documents must identify products as *organic*. All records must be accessible to the inspector.

Which of the following records do you keep for organic processing/handling?

Incoming:

- purchase orders contracts invoices receipts bills of lading Customs forms scale tickets
- quality test results Certificates of Analysis Transaction Certificates
- copies of Certificates of Organic Operation verification of non-GMO ingredients
- verification of ingredients produced not using sewage sludge
- verification of ingredients produced/handled without ionizing radiation
- documentation that organic ingredients are not commercial available, when using nonorganic ingredients in products labeled as *100 percent organic and/or organic*
- receiving records receiving summary log (12 mos.) other (specify)

In-Process:

- ingredient inspection forms blending reports production reports equipment clean-out logs
- sanitation logs packaging reports QA reports production summary records (12 mos.)
- other (specify)

Storage:

- ingredient inventory reports finished product inventory reports other (specify)

Outgoing:

- shipping log transport unit inspection/cleaning forms bills of lading scale tickets purchase orders
- sales orders sales invoices phytosanitary certificates export declaration forms
- Transaction Certificates copies of Certificates of Organic Operation shipping summary log
- sales summary log audit control register complaint log other (specify)

Describe your lot numbering system.

5-digit system. First two numbers=year (e.g. 06=2006); last three digits=Julian calendar date.

Can your recordkeeping system track the finished product back to all ingredients?

Yes No

Can your recordkeeping system balance organic ingredients in and organic products out?

Yes No

How long do you keep your records?

At least 7 years.

I affirm that all statements made in this Organic Handling Plan are true and correct. I agree to comply with the Organic Foods Production Act of 1990 and National Organic Program Rules and Regulations. I understand that the facility may be subject to unannounced inspection and/or organic products may be sampled and tested for residues at any time. I agree to provide further information as required by the certifying agent.

Signature of Owner/Manager George Smith Date 2/12/06

I have attached the following additional documents:

- | | | |
|---|---|--|
| <input checked="" type="checkbox"/> product flow chart | <input checked="" type="checkbox"/> facility map | <input checked="" type="checkbox"/> Organic Product Profiles |
| <input checked="" type="checkbox"/> pest management map of traps and monitors | <input checked="" type="checkbox"/> water test, if applicable | <input type="checkbox"/> MSDS, if applicable |
| <input checked="" type="checkbox"/> organic product labels | <input type="checkbox"/> labels for minor ingredients | |
| <input type="checkbox"/> labels for other substances used (boiler additives, cleansers or pesticides) | | <input type="checkbox"/> other (specify) |

- I have made copies of this Organic Handling Plan and other supporting documents for my own records.

Submit completed form, fees, and supporting documents to:

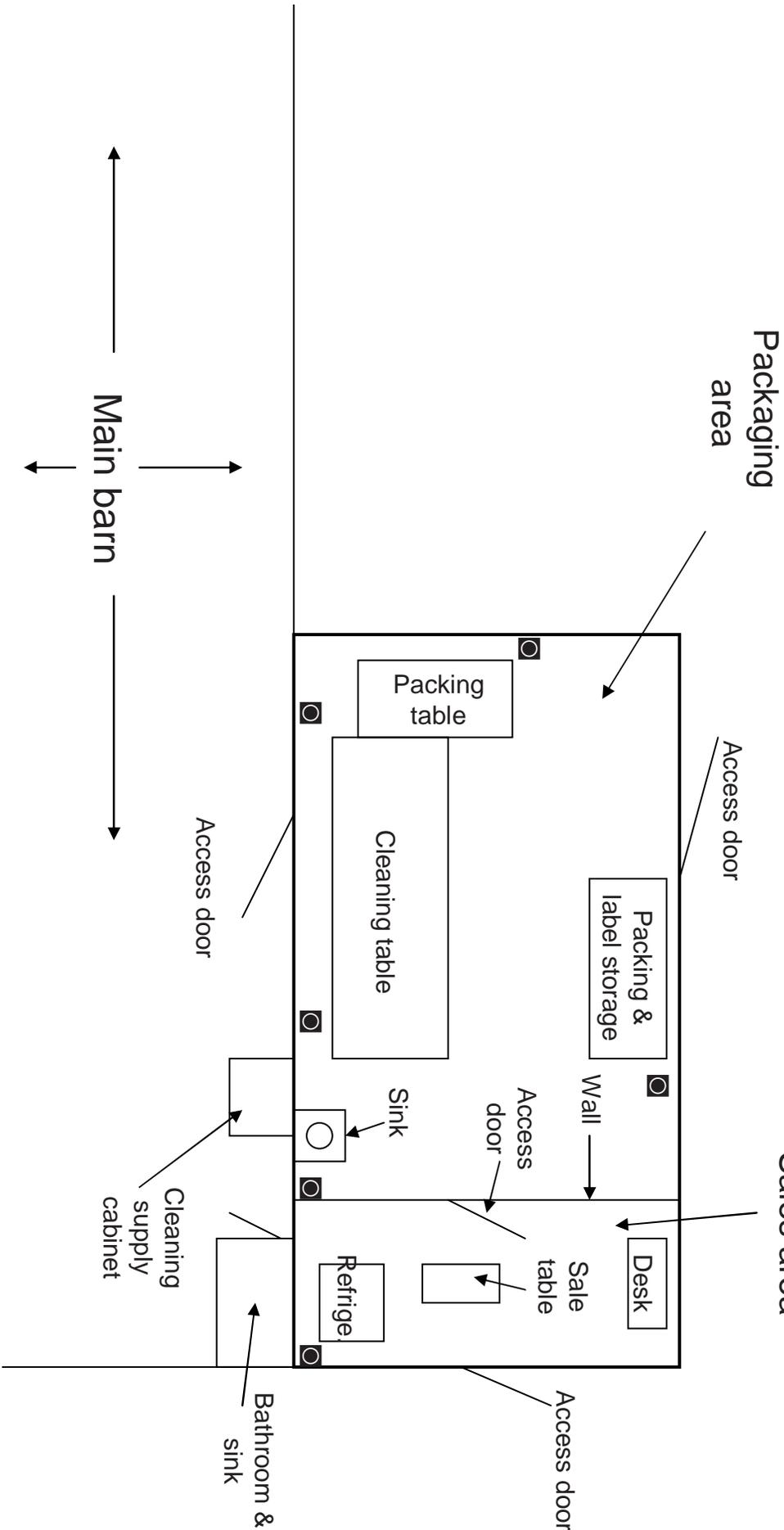
**Lehigh Valley Organic Certifiers
P.O. Box 28
Shelby, PA 17001**

Maple Knoll Farm
George & Helen Smith
Shelby, PA

■ Large sticky traps

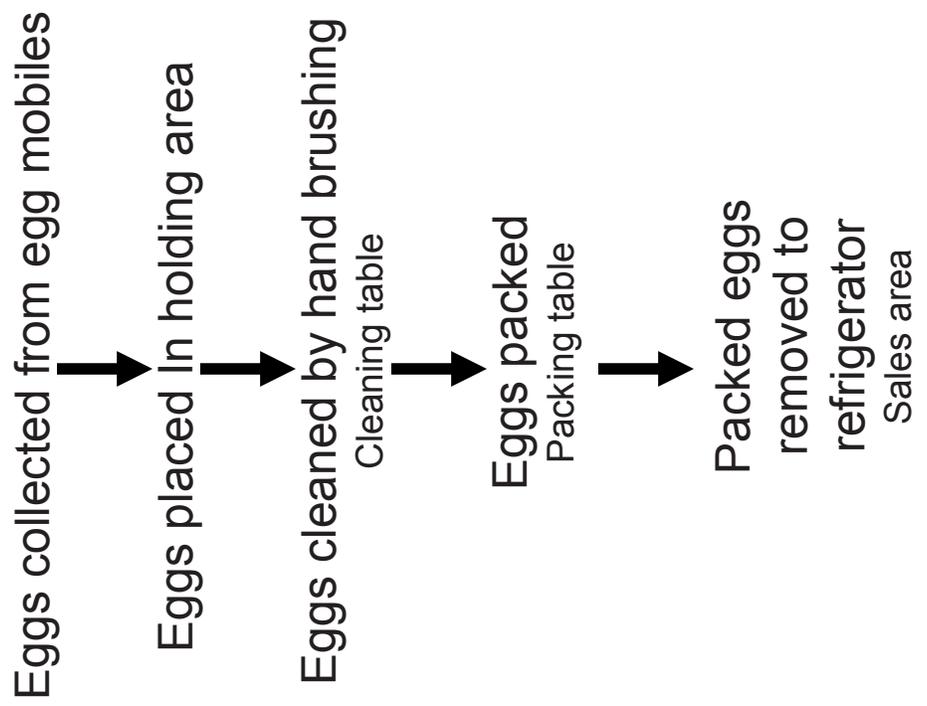


Egg Room
Facility & pest
management map



Maple Knoll Farm
George & Helen Smith
Shelby, PA

Process flow chart



Organic Product Profile

Applicant/company name <i>Maple Knoll Farm</i>	Date <i>2/12/06</i>	Name of Product Requested for Certification <i>Maple Knoll Farm 100% Organic Free-Range Eggs</i>
		Percentage of Organic Ingredients² <i>100 %</i>

Check which labeling category this product meets. Attach samples of labels for all products for which this Organic Product Profile is used.
 100 percent organic organic (at least 95 percent organic ingredients) made with organic (ingredients or food group(s)) (at least 70 percent organic ingredients)

Product Composition: Complete the information for all ingredients contained in this product. Although water and salt are not considered when determining the percentage, include information about these ingredients.

INGREDIENT ³ (INCLUDE ADDITIVES)	CHECK IF INGREDIENT IS CERTIFIED ORGANIC (✓)	SUPPLIER	CERTIFYING AGENT	IF NON- AGRICULTURAL, CHECK IF INGRD. IS ON THE NATIONAL LIST (✓)	HAVE YOU VERIFIED THAT THE NONORGANIC INGREDIENT WAS NOT PRODUCED USING ANY OF THE FOLLOWING (✓):			CHECK IF YOU HAVE DOCUMENTATION THAT THE NONORGANIC AGRICULTURAL INGREDIENT WAS NOT COMMERCIALY AVAILABLE ⁵ IN ORGANIC FORM (✓)	% OF FINISHED PRODUCT
					Excluded Methods ⁴	Sewage Sludge	Ionizing Radiation		
Eggs	✓	Maple Knoll Farm	Lehigh Valley Organic Certifiers		✓	✓	✓	100	

Does this product include organic and nonorganic forms of the same ingredient?⁶
 If yes, list the specific organic and nonorganic forms of the same ingredient. Yes No

Processing Aids: Provide complete information about all processing aids used in the manufacture of this product. *None used.*

PROCESSING AID	CHECK IF PROCESSING AID IS CERTIFIED 100% ORGANIC ⁷ (✓)	IF NONORGANIC, CHECK IF PROCESSING AID IS ON THE NATIONAL LIST? (✓)	SUPPLIER	CERTIFYING AGENT

² Calculate the percentage of organic ingredients by dividing the total net weight or volume of combined organic ingredients (excluding water and salt) by the total weight or volume of all ingredients (excluding water and salt).
³ All products labeled *100 percent organic* or *organic* and all ingredients identified as *organic* in an ingredient statement must not be produced using: excluded methods; sewage sludge; ionizing radiation; a processing aid not on the National List; or sulfites, nitrates or nitrites added during the production or handling process (except that wine containing added sulfites may be labeled *made with organic grapes*).
⁴ Excluded methods include cell fusion, microencapsulation and macroencapsulation and recombinant DNA technology (gene deletion, gene doubling, introducing a foreign gene and changing the positions of genes when achieved by recombinant DNA technology).
⁵ For products labeled as *100 percent organic* and *organic*, handlers are required to source organic ingredients when commercially available. Commercial availability is determined by three factors: appropriate form, quality or quantity. This is not required for products labeled as *made with...*
⁶ Products labeled *organic* or *made with...* must not include organic and nonorganic forms of the same ingredient, except that a nonorganic ingredient in a product labeled *made with...* may contain organic and nonorganic forms of the same ingredient. This ingredient must not be labeled *organic* on the ingredient statement or be counted in the calculation of the product's organic percentage.
⁷ Required for products labeled as *100 percent organic*.

Egg Label for 2006

(both labels appear on each carton)

Maple Knoll Farm 100% Organic Free-Range Eggs

- Small
- Medium

“The Way It’s Meant to Be”

One Dozen Brown Eggs

- Large
- Jumbo



Produced and Packed by
Maple Knoll Farm
423 Sandpiper Rd.
Shelby, PA 17001
Lic # 00075389b

Lot #

Certified Organic by
Lehigh Valley
Organic Certifiers
PO Box 28
Shelby, PA 17001

Final note

Remember that your completed application constitutes your organic system plan and functions like a contract. If you need to modify, update, amend or otherwise deviate from this plan, be sure to consult your certifier. Do so in advance if at all possible.

Organic System Plans: Livestock Production

By George Kuepper

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Cynthia Arnold and Robyn Metzger, Production

This publication is available on the Web at:

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