



## Organic Grower Tip Sheet

**New to organic certification?** This tip sheet will guide you through some of the relevant regulations for organic growers and help orient you to the regulatory framework.

In order to be certified as an organic grower, you must comply with the regulations established in the National Organic Program (NOP) standards, which are codified in 7 CFR Part 205. The standards, which are summarized below, were adopted by the USDA to implement the Organic Food Production Act of 1990. You can find the full text of the National Organic Program regulations online: [eCFR 7 Part 205](https://www.ecfr.gov/current/title-7/chapter-I/subchapter-A/part-205).

Additional Resources:

- [National Organic Program Handbook](#)
- [NOP Certification Standards Manual](#)

### Important National Organic Program (NOP) Regulations

| Regulation                                                                      | Key Takeaways – Click the Regulation for Full Text                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="#">National List of Allowed and Prohibited Substances §205.600-606</a> | Also called The National List, this section includes the substances, not branded products, that are allowed or prohibited in organic production. §205.601 specifically lists substances allowed for use in crop production.                                                                                                                                                                                                     |
| <a href="#">Organic System Plans §205.201</a>                                   | In order to be certified to the USDA Organic standard, you must develop and follow an Organic System Plan (OSP), a detailed document that outlines your practices for producing and/or handling organic products.                                                                                                                                                                                                               |
| <a href="#">Recordkeeping §205.103</a>                                          | Certified organic growers must maintain records that are sufficient to demonstrate compliance with the NOP standards for a minimum of five years. Typical records for growers include but are not limited to crop production and harvest records, sales receipts, input documentation, equipment cleaning logs, and storage records. A good rule to keep in mind: if it happens on your operation, write it down and keep it.   |
| <a href="#">Land Use Requirements §205.202</a>                                  | Land must be free of prohibited substances for 36 continuous months before being eligible for certification. Buffer zones must be maintained between organic crops and non-organic crops and/or prohibited substances.                                                                                                                                                                                                          |
| <a href="#">Soil Fertility and Crop Nutrient Management Practices §205.203</a>  | Organic growers must manage crop nutrients and soil fertility in a way that maintains or improves soil organic matter and does not contribute to the contamination of crops, soil, or water. The NOP regulations provide instructions for the use of raw manure, compost, and crop nutrients. Any synthetic substance used as crop nutrients or for soil fertility must be allowed and listed on the National List at §205.601. |



## Quality Certification Services (QCS)

5700 SW 34th Street, Suite 349, Gainesville FL 32608

phone 352.377.0133 / fax 352.377.8363

[www.qcsinfo.org](http://www.qcsinfo.org)

| Regulation                                                                   | Key Takeaways – Click the Regulation for Full Text                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="#"><u>Organic Seeds, Seedlings, and Planting Stock §205.204</u></a> | <p>All seeds and planting stock used to produce an organic crop should be certified organic, unless an equivalent organic variety is not commercially available. In this case, growers may use nonorganic, untreated seeds and planting stock, but you must demonstrate your attempts to source organic varieties.</p> <p>Only certified organic annual seedlings are allowed to produce an organic crop.</p> |
| <a href="#"><u>Crop Rotation Practices §205.205</u></a>                      | <p>Organic growers must incorporate crop rotation into their organic crop management plan in order to improve soil health, address pest problems, manage plant nutrients, and control erosion. Growers must describe their rotations in the Organic System Plan.</p>                                                                                                                                          |
| <a href="#"><u>Crop Pest, Weed, and Disease Management §205.206</u></a>      | <p>Organic growers must first use preventative practices to control crop pests, weeds and diseases. If preventative practices aren't enough, growers may use mechanical or physical control methods. When these practices are still insufficient, growers may use synthetic substances on the National List allowed for use in organic crop production.</p>                                                   |
| <a href="#"><u>Mushroom Production §205.210</u></a>                          | <p>For growers producing organic mushrooms, this section of the NOP regulations provides details on acceptable mushroom management practices, allowed mushroom substrate and mushroom spawn.</p>                                                                                                                                                                                                              |
| <a href="#"><u>Labeling §205.300-311</u></a>                                 | <p>The NOP has specific labeling requirements for organic products. If you seek certification through QCS, labels must be submitted to us for pre-approval.</p>                                                                                                                                                                                                                                               |
| <a href="#"><u>Organic Integrity §205.272</u></a>                            | <p>Certified organic operations must prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances. These measures must be described in the Organic System Plan (OSP).</p>                                                                                                                                                                  |

This document is a **general summary** of the NOP regulations. It is **not** intended as a substitute for a complete reading and understanding of the law. Access additional information from the National Organic Program [website](#). The full text of the USDA organic standards can be found online here: [eCFR 7 Part 205](#).

QCS is a USDA-accredited certifying agent. QCS cannot provide consultation services to our clients, other than to ensure that their OSP is compliant with the National Organic Program standards. QCS maintains a list of consultants on [their website](#). **Note:** it is not required to use an organic consultant and QCS cannot make recommendations on specific consultants.



## A Note on Inputs: The National List & Material Review Organizations

Many new organic producers are anxious to use only approved substances on their operations - with good reason! The National List provides information on the individual substances that are allowed and prohibited in organic production. Third party, independent institutions known as material review organizations (MRO) are responsible for auditing branded products for compliance with the National List.

QCS recognizes four MROs: The Organic Material Review Institute ([OMRI](#)), California Department of Food and Agriculture ([CDFA](#)), Pennsylvania Certified Organic ([PCO](#)), and Washington State Department of Agriculture ([WSDA](#)).

Always confirm that an input is approved for organic production **prior** to use by calling Quality Certification Services at 352-377-0133 and speaking with your certification reviewer or updating your inputs in your Client Portal.

## Documents Required at Inspection

**Note:** This is not an exhaustive list and additional documents may be requested by your inspector.

1. A copy of your up-to-date organic system plan and attachments
2. Seed, seedling, and/or planting stock sourcing records
3. Planting, field activity, and harvest records
4. Input purchase and application records
5. Post-harvest handling, storage, shipping and/or sales records
6. Most recent soil/tissue tests if using restricted micronutrient inputs
7. Manure application and/or compost records if using raw manure
8. Up-to-date farm and facility map
9. If running a split operation, conventional production records may be requested as a part of the audit process
10. Documentation that demonstrates gross annual income from organic sales or service fees
11. Any other records necessary to verify compliance with the National Organic Program

**Note:** While we'll typically be reviewing records pertaining to the current and preceding year, please be aware that NOP regulations require that records be maintained for a minimum of 5 years.



## Quality Certification Services (QCS)

5700 SW 34th Street, Suite 349, Gainesville FL 32608

phone 352.377.0133 / fax 352.377.8363

[www.qcsinfo.org](http://www.qcsinfo.org)

## Additional Resources

[QCS's Frequently Asked Questions](#) - Answers to general questions about certification.

[QCS's External Resource Page](#) - Links to external education and resources.

[Florida Organic Growers \(FOG\)](#) - FOG provides resources to organic growers in Florida and beyond.

[Organic Materials Review Institute \(OMRI\)](#) - An MRO with a wide array of products approved for use in organics.

[National Sustainable Agriculture Service \(NRCS\)](#) - A USDA office offering conservation solutions so agricultural producers can protect natural resources and feed a growing world.

[USDA Sustainable Agricultural Research and Education \(SARE\)](#) - Farmer-driven innovations in agriculture that improve profitability, stewardship and quality of life.

[Rodale Institute](#) - A non-profit that focuses on research, farmer training, and consumer education.

[USDA Transition to Organic Partnership Program \(TOPP\)](#) - Resources for producers seeking to transition to organic production practices.

[National Center for Appropriate Technology](#) - A national service that provides technical assistance, learning opportunities, and research to operators across the agricultural industry.

[Organic Trade Association](#) - A national members-based trade organization that provides resources to organic producers and advocates for organics at a national level.

[Organic Certification Cost Share Program](#) - Organic operators based in the US can apply for cost share reimbursement for 75%, up to \$750, for organic certification costs incurred from October of the previous year to September of the current year.