OREGON TILTH®

QUICK START GUIDE:

TRANSITION ★ YOUR FARM OPERATION TO ★ organic

Oregon Tilth's Quick Start Guide series is designed to provide all of the basics necessary to jump right in and get started on certification-related actions immediately.

QUICK START GUIDE:
TRANSITION TO ORGANIC

Thinking about transitioning to organic but not sure where to start? This Quick Start Guide for Transitioning to Organic is intended to ask (and answer) big questions as well as provide you with resources and tools to use as you work towards organic certification.

IMPORTANT

QUESTIONS & GUIDELINES:

- HOW LONG IS THE TRANSITION PROCESS?
- WHAT RULES AND REGULATIONS DO I NEED TO FOLLOW DURING THE TRANSITION PERIOD?
- WHAT RECORDS DO I NEED TO KEEP DURING TRANSITION?
- WHAT ARE THE RULES FOR TRANSITIONING LIVESTOCK?
- WHAT IS TRANSITIONAL CERTIFICATION?
- WHEN SHOULD I APPLY FOR ORGANIC CERTIFICATION?

LET'S GET STARTED!

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TRANSTION TO ORGANIC:
THE TRANSITION PROCESS

HOW LONG IS THE TRANSITION PROCESS?

Understanding the requirements for transitioning a conventional farm to organic production - from timelines, to rules and regulations - is an important part of the process. A period of three (3) years is required to make the transition from conventional agriculture to certified organic production. This transitional time is calculated from the date of the last use of a prohibited material up to the harvest date of the first organic crop. If the land is free of prohibited materials for three or more years, it is eligible to be reviewed for organic production requirements immediately.

Food for Thought:

PLANTING TIMELINE

A producer may plant a crop destined to be sold as certified organic before their organic certification eligibility date. In order to harvest the crop as organic, all of the following criteria must be met:

1. The crop's first harvest date is **after** the full 36 months or three years from last prohibited material application.
2. The land was inspected by an organic inspector.
3. The producer received final certification from an accredited certification agent.

DEFINED:

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PROHIBITED MATERIAL

A prohibited material is any agricultural input that in any aspect of organic production or handling is prohibited by the USDA National Organic Standards.

TRANSITION TO ORGANIC:
THE TRANSITION PROCESS

Calculating Land Eligibility for
ORGANIC CERTIFICATION

DATE OF LAST USE
OF PROHIBITED MATERIALS

+

THREE YEAR (36 MONTHS)
LAND REQUIREMENT

ORGANIC
CERTIFICATION
ELIGIBILITY DATE

MAY 15, 2015
Corn with synthetic seed treatment planted

+

THREE YEARS
(36 MONTHS)

CERTIFICATION
ELIGIBILITY DATE:
MAY 16, 2018

TRANSITION STRATEGIES:

Transitioning to organic takes a lot of preparation, planning and forward thinking. Since this process takes time and resources, you do not need to transition all of your land into organic production at the same time.

Some transition strategies include:

FULL TRANSITION:
Transition all land to organic production at once

GRADUAL TRANSITION:
Transition land one field at a time, with the end goal of certifying all land eventually

SPLIT TRANSITION:
Simultaneously manage both conventional and organic land

TRANSITION TO ORGANIC:
RULES + REGULATIONS

WHAT RULES + REGULATIONS DO I NEED TO FOLLOW DURING THE TRANSITION PERIOD?

For 36 months leading up to organic certification, producers must only use materials that are allowed in organic production according to the USDA National List of Allowed and Prohibited Substances. This includes all inputs, fertilizers, pest and disease controls, seeds, livestock treatments, cleaning agents, and any other materials used on the farm.

HOW DO I DETERMINE IF A MATERIAL IS ALLOWED?

REVIEW THE USDA NATIONAL LIST OF ALLOWED AND PROHIBITED SUBSTANCES

Synthetic materials cannot be used in organic production unless they are specifically approved. Natural (also called non-synthetic) materials can be used unless they are specifically prohibited.

CHECK IF THE MATERIAL IS LISTED ON THE APPROVED LISTS OF BRAND NAME OR GENERIC MATERIALS

The Organic Materials Review Institute (OMRI) and the Washington State Department of Agriculture (WSDA) maintain and update lists of materials and products approved for organic production.

CONFIRM ALL MATERIALS WITH YOUR CERTIFIER

Always check with your certifier prior to use to verify that the material is allowed for your organic production.

HOW IS THE NATIONAL LIST ORGANIZED?

§ 205.600-606

Section of the National Organic Standards that lists the allowed and prohibited inputs for the different scopes of organic production. Basically, any non-synthetic substances are allowed in organic production and handling unless they are on this list as prohibited, and all synthetic substances are prohibited unless they are on this list as allowed.

§ 205.601
Lists synthetic materials allowed for organic crop production, including any annotations that restrict use

§ 205.602
Lists nonsynthetic (natural) materials prohibited for use in organic crop production

§ 205.603
Lists allowed synthetic materials for organic livestock production, including any annotations that restrict use

§ 205.604
Lists prohibited nonsynthetic (natural) materials

TRANSITION TO ORGANIC: RECORDKEEPING

WHAT RECORDS DO I NEED TO KEEP DURING THE TRANSITION PROCESS?

Producers are required to keep records on all activities and transactions to demonstrate compliance with the USDA National Organic Program (NOP) Standards. Certain records must be submitted with the certification application, commonly called the Organic System Plan (OSP). Additional records must be available to inspectors when they visit an operation. It is important to establish a **Recordkeeping Plan** early on, describing your process of tracking information from seed to sale.

FARM MAP

The map must include the name or code of the parcel to be certified, the location, description and size of any buffer areas, neighboring land uses, processing areas, location of buildings, and the presence or use of treated lumber on the farm.

HISTORY OF LAND USE AND MATERIAL APPLICATIONS:

Include records of land use practices and all material applications over the last three years. This includes a signed statement or affidavit that no prohibited materials were applied or used.

PLANNED MATERIALS:

A comprehensive list of all materials, including seeds, fertilizers, pest, weed and disease control materials applied to crops during the upcoming year.

PLANNED CROPS:

Provide a list of all of your crops to be produced, including the location, and acreage for each crop. You can change your OSP throughout the year, just make sure to notify your certifier.

TOOL TIPS: MATERIAL INFORMATION TO SAVE FOR YOUR INSPECTION

- Product Name
- Manufacturer Name
- Original or photocopy of label with ingredients
- Purchase receipts
- Quantity and location of material applied
- Compliance documentation (OMRI Certificate or Certifier Approval Letter)

RECORDKEEPING RESOURCES

Recordkeeping Forms for Organic Producers:
http://1.usa.gov/23ckQMd

Organic Field Crops Documentation Forms:
http://bit.ly/1W7Q05q

Organic Livestock Documentation Forms:
http://1.usa.gov/1N9086P

TRANSITION TO ORGANIC: LIVESTOCK

WHAT ARE THE RULES FOR TRANSITIONING LIVESTOCK?

DAIRY ANIMALS

Dairy animals require a one-year (1) transition period. During this time, milking animals can be fed:

- Certified organic feed and pasture
- Feed grown on land that is managed by the producer and eligible for organic certification
- Feed grown on transitional land that is managed by the producer in its last year of transition (e.g., land where a prohibited material was last applied 24 to 36 months ago)

SLAUGHTER STOCK

In order for slaughter stock to be sold as organic, they must be under full organic management beginning no later than the third trimester of gestation. This means that the mother cow (or other animal) must be managed organically for at least three (3) months before the slaughter animal was born. **Remember: Conventional animals can never be transitioned or sold as organic slaughter stock.**

BREEDING STOCK

Breeding stock does not have to go through a transition process. In order for offspring to be considered organic, the mother must be managed organically for three (3) months before her offspring is born.

POULTRY

Poultry from conventional sources are allowed for the production of organic meat and eggs only if they are raised organically beginning the second day of life (e.g., "day-old chicks"). Older birds grown under conventional management are allowed only as breeder stock for the production of hatching eggs; neither the conventional birds nor their eggs can be sold as organic.

TOOL TIPS: TRANSITIONAL FEED

The provision for feeding farm-grown, third-year transitional feed is only allowed for herds that are currently in the one-year (1) transition period, and cannot be fed to herds that are already certified organic. All other USDA NOP Standards for Livestock must be followed during the one-year (1) transition period.

TOOL TIPS: REPLACEMENT OF ANIMALS IN AN ORGANIC DAIRY HERD

The allowances for how and when to bring new animals into an organic herd is currently being reviewed by the National Organic Standards Board. We recommend checking with your certifier to verify their interpretation of this part of the standard.

LIVESTOCK PRODUCTION RESOURCES

Transition to Certified Organic Milk Production (eOrganic): http://bit.ly/1TzxouC

Transitioning to Organic Dairy Fact Sheet (MOSES): http://bit.ly/1PRQuoQ

TRANSITIONAL CERTIFICATION

WHAT IS TRANSITIONAL CERTIFICATION?

Oregon Tilth offers voluntary Transitional Certification for operations that are in the process of transitioning land to organic. The Transitional Certification service acts as a stepping-stone for operations that desire certification for parcels of land but do not meet the three year land history requirements

Why should I consider Transitional Certification?

UNDERSTAND THE PROCESS

This service helps you become familiar with the certification and inspection processes and minimizes risk of non-compliance issues when applying for organic certification in the future.

EFFICIENT PLANNING

This service introduces you to the necessary paperwork and records needed for organic certification. This will help with future planning and ensure completion of the certification process prior to your first organic harvest.

ACCESS TO MARKETS

Certain companies or buyers may offer a premium price for products labeled as Certified Transitional, creating access to additional markets and customer bases.

INCREASE CUSTOMER LOYALTY

Transitional certification provides proof that you are on your way to provide customers with goods and services that meet their growing needs. Show customers your commitment to becoming organic by labeling your products as Certified Transitional.

TOOL TIPS: APPLYING FOR OREGON TILTH'S TRANSITIONAL CERTIFICATION

For Transitional Certification, you must submit an Organic System Plan and affirm that your land is free of prohibited materials for a minimum of 1 year. For the next two years of transition, your operation must renew the transitional certification and undergo an inspection just like all other organically certified clients.

TOOL TIPS: CERTIFIED TRANSITIONAL LABELING

During this time period, transitional agricultural products must not be labeled, sold or represented using the word "organic" in any form. Producers must be certified transitional in order to label their products as "Transitional Certified."

(Certification is not required to label products as "transitional.")

APPLYING FOR ORGANIC CERTIFICATION

WHEN SHOULD I APPLY FOR ORGANIC CERTIFICATION?

Most organic certifiers accept applications on a rolling basis. While the amount of time it takes to certify an applicant varies based on the operation's complexity, three to six months is a general estimate. If you plan to sell a certified product by a specific date, notify your certifier well in advance so there is adequate time to review the application and send an inspector to your operation. Oregon Tilth offers expedited services and will prioritize the review and inspection of your operation for an additional fee.

The Oregon Tilth Certification Process

SUBMIT APPLICATION

Applications take an average of 3-6 months to process, inspect, review and approve. Expedited services are available for an additional fee.

FIRST REVIEW

Oregon Tilth reviews application to evaluate organic standards compliance. We may request additional information.

INSPECTION

An inspector visits your operation to verify organic standards compliance. Inspections usually last 3-5 hours.

FINAL REVIEW

Oregon Tilth reviews your application and the inspector's report to evaluate compliance with the organic standards.

CERTIFICATION

We will send the organic certificate identifying your company, category of certification and certified organic products or services.

COMPLETING YOUR ORGANIC SYSTEM PLAN (OSP)

To apply for certification, you must fill out an application, commonly known as the OSP. The OSP is the foundation of the organic certification process and is the primary document by which a producer demonstrates compliance with USDA NOP Standards on all aspects of their operation.

OSP TIPS:

- Confirm which OSP forms you need to fill out if you are unsure. Not all forms are required to be filled out for all operations.
- Anytime you make a significant change to your OSP, whether it be using a new input, growing a different crop, or purchasing new animals, notify your certifier to ensure that the change can be approved.

CERTIFICATION TIPS:

- Familiarize yourself with the certification application early in the transition process.
- Develop a recordkeeping plan as soon as you decide to transition.
- Review the USDA NOP Standards: http://1.usa.gov/1XeLoJa.
- Find an organic grower in your community and ask them to be your mentor.

TRANSITION TO ORGANIC: CASE STUDIES

CASE STUDY 1:
AGRI-STAR FARMS

In 1999, Doug Lewis began the "interesting challenge" of transitioning over 800 acres in North Powder, Oregon. Throughout the process, Doug faced several challenges common to transitional organic producers. Providing adequate fertility for his crops—organic barley, wheat, oats, potatoes and yellow mustard seed—was challenging for Doug when transitioning to organic. Chicken manure is readily available but expensive, and repeated applications can lead to excessive levels of phosphorus and potassium in the soil. With support from the Natural Resource Conservation Service, Doug is exploring nutrient cycling with alfalfa, using longer crop rotations to provide nitrogen without increasing other nutrients.

Learn more about Agri-Star Farms Transition Story

CASE STUDY 2:
JOHNATHAN + CAROLYN OLSON

During the past 15 years, Jonathan and Carolyn gradually transitioned 1,100 acres. Throughout the transition, they've maintained what's known as a "split operation" with some ground under organic and some under conventional management. With consistently good yields and premiums earned for organic crops, the Olsons are reaching their long-term goal of fully paying down farm debt. "Financially, the last couple of years have been very rewarding," says Jonathan. Their three-year rotation includes corn, soybeans and, in year three, small grains followed by a cover crop. The Olson's organic corn yields regularly equal or exceed conventional county averages while their organic soybeans yield slightly below conventional averages.

Learn more about the Olson's transition process.

Credit: DiGiacomo, Gigi and Robert P. King. 2015. "Making the Transition to Organic: Ten farm Profiles." University of Minnesota and the USDA National Institute of Food and Agriculture.

TRANSITION TO ORGANIC: RESOURCES

TRANSITION TO ORGANIC NETWORK:

The Transition to Organic Network (TON) is a nation-wide online community of farmers, processors, buyers, agricultural service providers and other food system stakeholders. TON members connect and communicate with each other via a listserv to:

- exchange questions and resources related to transitional and organic agriculture and certification
- network and develop relationships with other actors in the transitional and organic community
- stay informed about educational opportunities and programs for transitioning and organic producers and buyers

Subscribe to the Transition to Organic Network

CONSERVATION SERVICES (NRCS)

The NRCS provides technical and financial assistance to producers who are transitioning from conventional to organic agriculture. Services include:

Develop a Conservation Activity Plan (CAP) 138:
A CAP can be developed for producers to identify conservation practices needed to address a specific natural resource need. With a CAP, producers can apply for NRCS financial assistance (e.g. EQIP) to implement the needed conservation practices.

The Environmental Quality Incentives Program's Organic Initiative (EQIP):
The EQIP program provides technical and financial assistance (up to $20,000/year) to implement conservation planning and practices to address resource concerns associated with organic operations that are challenging for transitioning producers, such as establishing buffer zones, improving soil quality while minimizing erosion, and more.

Additional Transition Resources

Organic Farming Resources: https://attra.ncat.org/organic.html

Sound & Sensible Blog (USDA): https://www.ams.usda.gov/report-presentation/sound-sensible

Tools for Transition Project (eOrganic): http://eorganic.info/group/7820

Organic to Transition Business Handbook (SARE): http://www.sare.org/Learning-Center/Books/Organic-Transition

Making the Transition to Organic: http://www.misa.umn.edu/Publications/MakingtheOrganicTransition/index.htm

Recordkeeping Case Studies (Oregon Tilth): https://tilth.org/resources/lessons-learned-series-organic-recordkeeping-for-materials/

Guide for Organic Crop Production (ATTRA/USDA): https://www.ams.usda.gov/publications/content/guide-organic-crop-production

Guide for Organic Livestock Production (ATTRA/USDA): https://www.ams.usda.gov/publications/content/guide-organic-livestock-producers

Big Questions Answered: Preparing for an Organic Inspection: https://tilth.org/resources/big-questions-answered-preparing-for-an-inspection