



NORTHWEST CENTER FOR  
ALTERNATIVES TO PESTICIDES



# NCAP'S 9<sup>TH</sup> ANNUAL ORGANIC FARMING CONFERENCE

## January 20, 2018 in Boise, ID



University of Idaho  
Extension



# Established Certified Operations

ISDA Organic Program  
Material Reviews  
Inspection Tips  
NOP Updates



Johanna Phillips,  
Program Manager



# Material Reviews

- ▶ Any material used at an organic operation must be allowed, if it will have contact with organic crops, soil, livestock, or processed organic products.
- ▶ Material lists must be submitted with the annual OSP update.
- ▶ Examples:
  - ▶ Crop Fertility, Pest, Weed, or Disease control
  - ▶ Facility pest management, Facility sanitation
  - ▶ Livestock feed, health care products, treatments

# What is a material review?

§205.105 Allowed and prohibited substances, methods, and ingredients in organic production and handling.

To be sold or labeled as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)),” the product must be produced and handled without the use of:

- (a) Synthetic substances and ingredients, except as provided in §205.601 or §205.603;
- (b) Nonsynthetic substances prohibited in §205.602 or §205.604;
- (c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605;
- (d) Nonorganic agricultural substances used in or on processed products, except as otherwise provided in §205.606;
- (e) Excluded methods, except for vaccines: *Provided*, That, the vaccines are approved in accordance with §205.600(a);
- (f) Ionizing radiation, as described in Food and Drug Administration regulation, 21 CFR 179.26; and
- (g) Sewage sludge.

## Subpart G—Administrative

### The National List of Allowed and Prohibited Substances

#### CROP

**§205.601** Synthetic substances allowed for use in organic crop production.

**§205.602** Nonsynthetic substances prohibited for use in organic crop production.

#### LIVESTOCK

**§205.603** Synthetic substances allowed for use in organic livestock production.

**§205.604** Nonsynthetic substances prohibited for use in organic livestock production.

#### HANDLING

**§205.605** Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s)).”

**§205.606** Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as “organic.”

# Recognized Material Review Organizations (MRO)



Organic Material Review Institute



Washington State Department of Agriculture



California Department of Food and Agriculture

# Material Review- MRO



## OMRI Listed®

The following product is OMRI Listed. It may be used in certified organic production or food processing and handling according to the USDA National Organic Program Rule.

### Product

Biologic Systems Fish Hydrolysate 2-3-0

### Company

Sasquatch Industries Inc.  
Alex Ganos  
4543 S. Pacific Hwy.  
Phoenix OR 97535 USA

### Status

Allowed

### Category

NOP: Fish Products, Liquid- stabilized

### Issue date

12-Dec-2017

### Product number

saq-10302

### Class

Crop Fertilizers and Soil Amendments

### Expiration date

01-Mar-2019

### Restrictions

Not applicable.



PO Box 42560, Olympia, WA 98504-2560 Ph (360) 902-1805  
In accordance with Chapter 15.86 RCW and Chapter 16-160 WAC

Washington State  
Department of Agriculture  
**MATERIAL REGISTRATION  
CERTIFICATE**

is issued to:

Austin Grant INC. dba Jet Harvest Solutions  
P.O. Box 915139  
Longwood, FL 32791  
United States

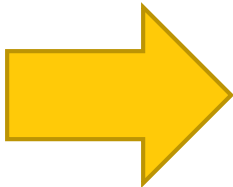
The products listed below have been verified to comply with the USDA National Organic Standards (7 CFR Part 205):

#	Product Name	Sub-Type	Type	Annotation
1449	Jet Oxide	Peracetic Acid	PH	For use in wash and/or rinse water according to FDA limitations. For use as a sanitizer on food contact surfaces [205.605(b)].
2049	Jet-Ag	Peracetic Acid	DPC	Preventative practices must be implemented prior to use [NOP 205.206(e)].

**Types:** CPA - Crop Production Aid, ~~DPC - Disease and Pest Control~~, FSA - Fertilizer and Soil Amendment, LPA - Livestock Production Aid, PH - Processing and Handling

WSDA Registered Company #: 70  
Issue Date: 10/12/2016  
Registration valid through October 31, 2017

Brenda Book  
Organic Program Manager  
DEPARTMENT OF AGRICULTURE  
AGR 2291 (R/3/16)





# Material Reviews- Unlisted Products

- ▶ Must be approved by your Certifying Agent prior to use!
- ▶ Failure to communicate use on organic production can cost certification (in full or in part).
- ▶ There is no exception for a prohibited material application!
- ▶ Examples:
  - ▶ Algaecides in irrigation\*
  - ▶ Pest control
  - ▶ Fertilizers that say "Organic"
  - ▶ Products that seem okay
    - ▶ Cottonseed Meal
    - ▶ Corn Meal
    - ▶ Sugar
    - ▶ Alfalfa
    - ▶ Salt

# Submit the following for Material Reviews

- ▶ Label
- ▶ SDS
- ▶ Contact information for the company
- ▶ Your intended use for the product
- ▶ List of ingredients/components
- ▶ Any other information that you have about the product

# Inspection Tips

- ▶ Review your OSP
  - ▶ Have updates ready
  - ▶ Make sure you have records to show you did what you said you would do
- ▶ Maintain records consistently
- ▶ Review your previous inspection report
- ▶ Be prepared to show corrective actions
- ▶ Review the inspection checklist and compile records
- ▶ Have your knowledgeable person(s) on inspection!

# Inspection Tips, Continued.

- ▶ Respond to corrective actions quickly.
- ▶ Ask questions if you don't understand.
- ▶ Read the rule and know what applies to your operation.

# Records

- ▶ Have records available according to your OSP

(We generally follow the OSP format for the order of inspection!)

- ▶ Review previous report(s) for clues about what we will need to see.

# Changes and Updates to NOP Regulation

# NOP Changes and Updates

- ▶ Effective August 7, 2017, the following are no longer allowed
  - ▶ For Crops - Lignin sulfonate (as a floating agent in postharvest handling) 205.601(l)(1)
  - ▶ For Livestock - Furosemide 205.603(a)(10)
  - ▶ For Handling - Magnesium carbonate 205.605(b)
- ▶ Non- organic versions of the following products are not allowed in processed organic products
  - ▶ Chia 205.606(c)
  - ▶ Dillweed oil 205.606(e)
  - ▶ Frozen galangal 205.606(h)
  - ▶ Frozen lemongrass 205.606(o)
  - ▶ Chipotle chile peppers 205.606(s)

# Other Changes and Updates

- ▶ Changes in Guidance/Handbook Documents - all on website
- ▶ Effective October 25, 2017, Interim Instruction on Maintaining the Integrity of Organic Imports (NOP 4013)
- ▶ Revised April 3, 2017, Policy Memorandum on the Confinement of Poultry Flocks Due to Low or Highly Pathogenic Avian Influenza, or Other Infectious Diseases (Policy Memo 11-12)
- ▶ Organic Livestock and Poultry Practices final rule effective date has now been delayed until May 14, 2018 but may be revoked and not implemented. This would amend the requirements by adding new provisions for livestock handling and transport for slaughter and avian living conditions; and expands and clarifies existing requirements covering livestock care and production practices and mammalian living conditions.



# Proposed Changes

- ▶ The NOP just published some proposed changes to the NOP Rule. Public comment period is open until March 19, 2018.
- ▶ The proposed rule would:
  - ▶ Add 16 substances to the list of those allowed in organic production and handling, providing new tools for producers and handlers in the organic industry;
  - ▶ Prohibit 1 substance (ivermectin) currently allowed in organic livestock production;
  - ▶ List a natural pesticide (rotenone) as prohibited to align with U.S. Environmental Protection Agency (EPA) regulations; and
  - ▶ Change 17 substances already on the National List to reflect current farming or processing practices and needs. For example, expanding the allowance for synthetic vitamins to include injectable vitamins for livestock.
- ▶ <https://www.federalregister.gov/documents/2018/01/17/2017-28172/national-organic-program-amendments-to-the-national-list-of-allowed-and-prohibited-substances-crops>

# Where to get news about changes

- ▶ The Organic Insider -  
[https://public.govdelivery.com/accounts/USDAAMS/subscriber/new?qsp=USDAAMS\\_5](https://public.govdelivery.com/accounts/USDAAMS/subscriber/new?qsp=USDAAMS_5)
- ▶ USDA NOP Website  
<https://www.ams.usda.gov/services/organic-certification>
- ▶ The Code of Federal Regulations (CFR)  
[https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title07/7cfr205\\_main\\_02.tpl](https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title07/7cfr205_main_02.tpl)

# Contact and Program Updates

- ▶ ISDA Organic Program has a new Phone Number!
  - ▶ 208-332-8680
  
- ▶ ISDA has a new website!
  - ▶ <https://agri.idaho.gov/main/about/about-isda/ag-inspections/organic-certification-program/>
  
  - ▶ Here is the Main ISDA Page
    - ▶ <https://agri.idaho.gov/main/>



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