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Overview of the Organic Certification Process: Certification in Five Stages

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Overview of the Organic Certification Process: Certification in Five Stages

Becoming certified and maintaining certification should be thought of as a continuous cycle rather than a single event. Compliance with the National Organic Program Final Rule is an ongoing and continuing duty, even though the process of verifying that compliance is cyclical. The certification cycle can be broken down into five stages: completing and submitting the application, initial review by the certifier, inspection by the certifier, final review, and ongoing compliance.

Stage 1: Completing and Submitting the Application

The NOP Final Rule requires applicants to compete an organic system plan that demonstrates the ability to comply with the regulations. However, this plan is not developed from scratch; QCS has created an application which, when filled out completely and accurately, requests all of the information necessary to demonstrate compliance with the act and to function as an organic system plan. To request a copy of this application, as well as the current manuals and handbooks, please contact the QCS office. There is a $25 charge for the printed version of the application packet. The electronic version of the application packet is available to anyone at no cost.

Prior to completing the application, the applicant should become familiar with the requirements of the NOP Final Rule, and contemplate what changes might be required in the operation’s current policies, practices, and procedures in order to comply with the regulation. Resources that may be helpful in identifying what areas of the applicant’s operations require adjustment or modification may also be found on the website for the Appropriate Technology Transfers for Rural Areas (ATTRA) at www.attra.org.

Once the applicant has identified what modifications are required to comply with the rule, the applicant should make those changes. Once compliant policies, practices, and procedures are in place, the applicant is ready to complete the application. Applicants should feel free to call the QCS office with any questions that arise while completing the application.

It is important that applicants understand that the application becomes the operation’s organic system plan which is both a demonstration of the applicant’s ability to comply and an agreement with QCS about how the operation will comply with the regulation. Accordingly, the organic system plan described in the application and approved by QCS must be adhered to in order to maintain organic certification. Modifications of the plan or variance from the plan should be undertaken only with approval from QCS in order to not jeopardize the organic certification. Once completed, the application is forwarded to QCS in duplicate, along with two sets of any required attachments, and the appropriate fees. A copy of the application and all attachments should be kept by the applicant.
Stage Two: Initial Review of Application by QCS Staff

Upon receipt of the application, the QCS staff verifies that the application is complete, that all necessary attachments are included, and that the appropriate fees have been paid. Then the staff commences an initial review of the application to determine if the application on its face demonstrates compliance with the regulation or the ability to comply with the regulation through minor modifications by the applicant.

Often further information is requested to clarify or complete the application. Prompt responses to requests for further information from QCS staff are critical in order to ensure timely consideration of the application by QCS.

If QCS determines that on its face the application demonstrates noncompliance with the regulations, QCS typically contacts the client, identifies the area of noncompliance, and requests the applicant identify how they intend to correct the area of noncompliance. If QCS determines that an applicant cannot demonstrate compliance with the regulations because the application is not complete and the client has not provided a timely response to requests for further information, QCS may deny the application. If QCS determines that the application demonstrates facial compliance, or the ability to comply with slight modification, QCS moves to the next stage of the certification process—the inspection.

Stage Three: The Onsite Organic Inspection

An on-site inspection of the operation to be certified is conducted prior to initial certification, and if certification is granted, on an annual basis thereafter. The purpose of the on-site inspection is to verify the completeness and the accuracy of the application, and to review materials and systems which are best viewed on-site such as the recordkeeping system, actual records, and fields. The extent to which the submitted organic system plan has been actually implemented is also evaluated.

The inspector and applicant will schedule the inspection for a time that is mutually convenient to conduct the inspection, and the inspector will follow a standard inspection protocol. The inspector’s job is to be the eyes and ears of QCS. The inspector will not make a decision on whether or not the operation qualifies for organic certification but will instead report on his or her observations during the inspection. At the conclusion of the inspection, the inspector will review with the applicant the areas of concern which he or she identified during the inspection. Every inspection reveals certain areas of concern and the identification of such areas does not mean that certification will not be granted. It merely means that the identified areas are areas that QCS will have to pay particular attention to before making a certification decision. Often times the inspection reveals areas where QCS will need further information, or areas where the applicant will have to make minor modifications prior to QCS making a certification decision.

The inspector may be an employee of QCS, or may be a qualified and experienced independent
contractor trained by the Independent Organic Inspectors Association, or otherwise qualified. Once the inspection is completed, the inspector submits a written report to QCS where they will begin the final review process.

**Stage 4: Final Review of the Application**

Upon receipt of the inspection report, a final review of the file is conducted. The purpose of the final review is to take a fresh look at the application in light of the inspector’s report and to determine if the operation is compliant with both the NOP Final Rule as well as the organic system plan that was filed originally.

Those operations which are compliant in both respects are granted an organic certificate. Those operations, for which further information is needed before a determination can be made, are asked to provide the information and given a reasonable deadline for forwarding the information to QCS. Operations having minor issues of noncompliance are given the opportunity to address those issues and bring the operation into compliance. Operations who decline to do so, or who cannot bring their operation into compliance, are denied certification.

**Stage 5: Continuing Obligations of Certification**

Maintaining certification is an ongoing process and not a single event. The granting of certification is based upon an agreement that the operation will continue to operate according to the organic system plan described in the application and which QCS approved. The certified operation has an ongoing obligation to inform QCS of changes in policies, procedures, products, and inputs and to update the organic system plan when such changes occur. A failure to do so is a noncompliance with the NOP Final Rule and can lead to suspension or revocation of organic certification.

The certified operation must also inform QCS of any incidents that impact the organic integrity of any product covered by the organic system plan, or would suggest to a reasonable person that the organic integrity of a product might be in question.

The certified operation has an ongoing obligation to respond to correspondence from QCS and to pay all the applicable fees of QCS. The certified operation must annually provide an updated organic system plan for the coming year and undergo an annual on-site inspection.

Questions: Please contact QCS Staff @ 352-377-0133 or email qcs@qcsinfo.org