

Organic System Plan Overview

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Organic standards not only require that operators maintain and improve the quality of natural resources, but that they must also incorporate practices that implement this goal in their management plans. Every certified organic producer is required to develop a production or handling system plan,¹ also more commonly known and referred to here as the Farm Plan.

The Farm Plan serves several purposes for an organic farm.

- (1) The Farm Plan is a *forward-looking management tool* that takes into account future anticipated states and conditions. As such, it helps the farmer to make rational anticipated decisions rather than forcing them to react to crises.
- (2) The Farm Plan is a *description of the human and natural resources* that a farm has as its productive capacity. When implemented, the Farm Plan can help a farm more fully develop its potential and use available resources more efficiently.
- (3) The Farm Plan is an *economic tool*. A well-constructed Farm Plan can help an operator budget for the coming season's expenses and income, and sustainably fulfill the potential to be viable both economically and sustainably. Finally,
- (4) The Farm Plan serves as a *legally binding contract* between the certifier and the certified operation. Breach of that contract can result in denial or loss of certification.

The Farm Plan carries with it a number of implications for management decisions for a certified organic farm. Some operators will require assistance in drafting a Farm Plan. Others will have a Farm Plan in place and—at least in the short run—will need to follow a course of action described in the Farm Plan. Operators will often seek advice only after other planned options are exhausted. Before an agricultural professional can give any advice to a certified organic operator, the professional should find out if the recommended practice will fit into the Farm Plan. Even if a material is registered for a certain crop and complies with organic standards, application outside the Farm Plan can still cause problems with certification. While it is possible to amend the Farm Plan, it is far better to think ahead.

The NOP Rule requires that the organic system plan include...

- Practices and procedures to be performed and maintained;
- A list of each substance to be used as a production or handling input;
- Monitoring practices and procedures to be performed and maintained;
- A description of the record keeping system;
- Practices and physical barriers established to prevent co-mingling with conventional food and contact with prohibited substances; and
- Any additional information needed to document NOP compliance.

1. Description of Practices

Farmers need to describe explicitly how they plan to manage their resources. The Farm Plan should document any soil and water conservation practices intended. A Farm Plan could include a description of tillage practices, irrigation methods, planting of hedgerows, stream buffers, drainage, manure handling practices, composting facilities, crop rotations.

Livestock operations should describe how animals will be provided access to the outdoors, how

¹ Paraphrased and adapted from 7 CFR 205.201.

the land will be managed where animals are kept, any physical alterations, and measures to reduce stress and preventive strategies for maintaining the health of animals.

Descriptions should include the tools and equipment to be used, the estimated frequency of the practice, and the methods that are otherwise used to carry it out. Agricultural professionals can assist in the preparation of Farm Plans by providing farmers with an inventory of tools and equipment available, the best available practices for the field conditions in the region, and estimates or models to help farmers optimize the timing of their practices.

2. List of Substances

A list of each substance to be used as a production or handling input that indicates its composition, source, location(s) where it will be used, and documentation of commercial availability, is required in the Farm Plan. In general, the composition and source of materials requires specific information on brand name products. All ingredients in farm inputs need to comply with the NOP Rule.

The planned locations for the application of fertilizers and pesticides must be described or recorded on a map. As a management tool, the Farm Plan can help to prepare budgets and improve the efficiency of input application. Precise descriptions of planned inputs help to document materials purchases and applications during inspections. The NOP Rule restricts substances not included in the Farm Plan.

Biopesticides, botanicals, or allowed synthetic substances can be applied only if they are contained within the Farm Plan and other measures prove ineffective.² Therefore, it is crucial that all inputs used during a season are included in the Farm Plan prior to their application and the conditions for their application are clearly documented. Unanticipated production problems that result in the application of restricted materials will require revision of the Farm Plan, and may result in difficulties during inspection if not well documented.

Livestock operations must document feed ingredients, health care products, and production aids in the Farm Plan. The Farm Plan should include the projected sources of organic livestock feed. Operators should be able to predict how much feed and forage will be produced on the farm, the dietary contributions of pasture and range, how much feed will need to be purchased, and what backup sources are available in case of crop failure, drought, or tight future market conditions. Farms that use non-organic feed additives and feed supplements must document the specific nutritional needs to be met by these non-organic feed ingredients and describe why organic sources are insufficient to meet these needs. The Farm Plan should also document any vaccinations, inoculants, animal drugs, or treatments that will be used in anticipation of common health problems or endemic diseases.

3. Monitoring Practices

Maintaining the quality of the environment and meeting certain application standards requires that the operation describe how to measure and document compliance with required practices. For example, operations that make compost need to describe how they will take temperatures. A number of synthetic substances require testing either for a deficiency before a given nutrient can be applied (e.g. micronutrients) or for environmental degradation after the substance is applied (e.g. potassium chloride or copper fungicides).

If biopesticides, botanicals, or allowed synthetics are applied, the operator should define the minimum pest thresholds that are used to determine if and when specific crop protection materials

²7 CFR 205.206(e).

will be applied and describe how pests will be scouted. If copper fungicides are used, the operator needs to document how and when soil accumulation of copper will be measured.

Livestock operations would provide information on how nutritional needs are met and how health care is maintained. For example, the Farm Plan would include fecal examination schedules to document the need for internal parasiticides.

4. Recordkeeping System

Certification is based not only on compliance with the standards, but also on the ability to document that compliance. The Farm Plan contains a description of each recordkeeping document. Operators must demonstrate how they were able to produce what they market as organic. During an audit, an operator must track the product all the way back to the field and how it was managed for at least three years prior to its production. Every input applied to soil, crop, or animal needs to be documented, with detailed information on the ingredients and brand names. Field operations, planting dates, harvest dates, yield records, sales, and chains of custody are all important documents for crop certification. Each animal must be tracked in a livestock operation, except in the case of poultry where recordkeeping is required of each flock. The recordkeeping system must record (1) all feed, including all feedstuffs, additives, and supplements; (2) all animal drugs, treatments, biologics, remedies, and parasiticides administered; (3) all alterations made and the steps taken to reduce stress, pain and suffering in conducting those alterations; and (4) the final sale or other fate of every animal, up to an animal's sale for slaughter, sale of that butchered animal's meat products or death. The recordkeeping system of handling operations also need to take into account organic agricultural commodities that are purchased, brokered, or otherwise handled on commission. Product in and product out must be balanced.

5. Contamination Prevention

Any operation faces potential loss of certification due to contamination resulting (1) from the mixing of non-organic and organic products (commingling); or (2) from the contact of organically grown crops, organically managed soils, or organically raised animals with prohibited substances. An operator needs to be able to demonstrate that the operation takes reasonable precautions to prevent contamination by prohibited substances from occurring. Operations that grow organic and non-organic crops are of particular concern. If contamination of a crop is subsequently discovered, a well-designed plan and clear documentation will be crucial to demonstrate that the contamination was the result of circumstances beyond the farmer's control. Unavoidable residual environmental contamination beyond the farmer's control should not result in loss of certification of an operation, although a specific crop may lose certification if the level of contamination exceeds 5% of the EPA tolerance.

6. Additional Information

The certifying agent may require additional information about certain aspects of the operation. If a grower has any doubt about a practice or procedure that the certifying agent may question, it is best to include it in the Farm Plan. This can help resolve any doubts about the status of a practice and its acceptability in an organic system before the inspection. The ATTRA workbooks and compliance lists offer helpful further guidance for developing Farm Plans. The ATTRA forms offer a suggested format. Most certifiers have their own formats.

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