



Native Farming and USDA Organic Certification

One certification option for Native farmers.

The market for fresh and organic food began to expand in the 1970s, opening new markets for organic producers and lengthening the supply chain. Now, food produced by traditional farmers and ranchers in these new markets often passes through many hands and travels many miles before reaching the consumer. An expanded and dispersed market results in consumers who may not be familiar with the farmer or their methods of production. Organic certification is one way of informing the consumer how a product was grown or raised, and is an option—although not always the best option—for traditional Native farmers with products that are often “organic by tradition.”



INTRODUCTION TO ORGANIC FARMING

As the distance between the farmer and consumer grows, it becomes necessary to assure that a purchased product was truly grown organically. Organic certification was created to address this need through a process called third-party certification. This is a simple concept where a third party—an organic certifying agent—evaluates crop producers, processors, and handlers to determine whether they conform to an established set of operating guidelines called organic standards. Based on an inspection, those producers who conform to the organic standards are certified by an

organic certifying agent and allowed to use a logo, product statement, or certificate to document their product as “certified organic.” In other words, the certifier assures buyers of the product's organic attributes.

The Organic Foods Production Act of 1990 mandated the creation of the National Organic Program (NOP) and the development of uniform organic standards to be followed by all private and state certifiers. These standards are now incorporated in the National Organic Program Regulations, and can be found on the NOP website.



IS ORGANIC CERTIFICATION APPROPRIATE FOR ALL TRADITIONAL NATIVE FARMERS & RANCHERS?

Traditional farming and organic farming share a commitment to ecological production. In both approaches, ecological production relies much more on natural biological processes and involves farming and ranching methods that conserve and build the soil, reduce pollution, and encourage development of a healthy, diverse agroecosystem. In organic farming, these methods include the use of diverse crop rotations, cover crops, livestock manure, compost, mineral-rich rock powders, etc., and have become the basis of the standards for organic certification. Although traditional farmers may



use some of these same techniques and materials, traditional practices tend to rely more on naturally available resources, and are constrained by factors such as climate, limited water, open-pollinated heirloom crop seeds grown by the farmer, and remote locations.



Traditional farming practices developed over long periods of time through adaptation to local environment, cultural practices, climate shifts, and pressure from outside influences. While they may be “organic by tradition,” these practices are often not recognized within the organic standards. In some instances, traditional farming practices may present a challenge for obtaining organic certification—even though they may actually be more sustainable than organic production farming—because they are not the same practices for which the organic standards were written.

For example, the use of cover crops, green manures, and crop rotation are part of organic standards, but these practices can be difficult to use in traditional rain-fed or flood-irrigated farming where crop rotations cannot be supported in drought years and flood irrigation is difficult for irrigating cover crops. At the same time, runoff and flood irrigation deliver soil nutrients to fields from higher up in the watershed, without the need for other soil amendments. This type of growing system also requires less mechanical tillage; however, this is not part of the organic standards.

To meet organic standards, livestock producers must make a commitment to manage and raise their livestock in ways that are humane and take into account the animals' natural behavior. This includes providing outdoor access and access to organic pasture, using only certified-organic supplemental feed, and agreeing to restrictions on physical alterations to the animals. Traditional management of sheep, for example, would meet the requirements for organic certification as long as the producer can demonstrate that

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FACTSHEET:

STEPS TO BECOMING CERTIFIED USDA ORGANIC

1. Identify a suitable certifier:

- ❑ Organic certification agencies may be operated by a state agriculture department, or they may be private entities, but they must be accredited by the National Organic Program (NOP). Certifiers work as an extension of the federal government, licensing producers to use the term "organic" in selling their products.
- ❑ In evaluating an appropriate certifier, it is important to use certain criteria:
- ❑ Find out their history of certifying traditional Native farming and ranching enterprises. Certifiers have to make judgment calls regarding compliance with organic standards and it helps if they understand Native farming practices.
- ❑ Find out the needs of your buyers; sometimes the buyer may request that a specific certifier be used.
- ❑ If a product is intended for an export market, ask if they offer additional accreditation beyond the NOP—for instance, by an international certification agency such as IFOAM.
- ❑ Ask about costs of certification. These vary from agency to agency.

2. Prepare and submit an application:

- ❑ After identifying a certifier, you need to request an application packet, which should include a copy of the organic standards, a materials list, and an organic farm plan questionnaire. Please note that crop, livestock, and processing/handling all require separate applications. You should read the standards and materials list carefully. The certification agency can answer any questions you have about the application process.
- ❑ The next step is to complete the questionnaire that will ask for information about your farm or ranch, including details about soil fertility planning, seeds and seedlings, weed and pest management practices (including the materials you plan to use), and storage and handling routines. A farm map will be required, along with crop and input histories for all fields. You will be asked about strategies to prevent contamination with prohibited substances and commingling with non-organic products, if applicable. The farm plan questionnaire will also ask you about your plans to monitor the farm operation to insure compliance with organic standards.

3. Review by the Certifier:

- ❑ The certifier reviews the organic farm plan application to be certain that it is complete and that your enterprise appears able to comply with NOP organic standards. If additional information is required, you will be asked to submit it at this time.

4. Inspection:

- ❑ If the certifier determines that your organic farm plan application is complete, they will assign an organic inspector to inspect your farm or ranch. The inspector looks for all indications that you are operating according to the organic plan you submit and that you are in compliance with organic standards. He or she will look at the fields, farm implements, and buildings; review borders and adjoining land use; and assess the risk for contamination and commingling. The inspector also reviews all written records documenting management practices, seed sources, materials used, compost production, and whether any conventional production is done on the farm. The inspector will ask to see records of harvest, storage, transportation, and sales. Then, an inspection affidavit (completed during the inspection) is signed by the producer and the inspector. If there are any non-compliance issues that come up, the inspector reviews those with you at the end of the inspection. After the inspection, the inspector submits a detailed report on the inspection to the certifier. *It is important to know that inspectors only record observations; they do not make decisions about certification.*

5. Final review:

- ❑ A certification committee or individual with expertise in organic farming and certification standards reviews the organic farm plan application together with the inspection report. There are four possible outcomes of this review:
 1. Approval for organic certification—if certification is granted, you can begin marketing your products as organic and use the seal of the certifier and also the USDA's organic seal.
 2. Request for additional information.
 3. Notification of noncompliance—notification of noncompliance implies that the applicant will be granted certification if certain things are changed.
 4. Denial of certification—a denial of certification is typically given when the certifier judges that the producer is clearly unable to comply with federal organic regulations. At this time, producers may not use the term "organic."

Fees charged for certification vary among certifying agencies (they can range from \$400 to \$2,000 per year). Fees vary with the size and complexity of the farm enterprise, the costs of inspection, and other factors, so be sure to get a clear explanation of the fee structure when choosing a certifier.

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the rangeland on which the sheep graze meets organic standards and can produce the required documentation for their livestock management.

Farmers seeking organic certification must understand in advance that prohibited substances (synthetic fertilizers and pesticides, etc.) cannot have been used on the land for three years preceding harvest of the first organic crop. Farms or specific fields that do not yet meet this requirement may be considered as “in transition.” Some traditional farms may employ conventional practices and these will need to be considered carefully when pursuing organic certification.



ORGANIC INTEGRITY & RECORDKEEPING

In the world of organic certification, maintaining organic integrity is essential. This means that the farmer or rancher takes steps that prevent contamination of organic crop production with prohibited materials and prevent the accidental mixing of organic and conventional products. On many traditional farms this would not be an issue, but the farmer must still produce the required documentation to verify that organic integrity is maintained.

A considerable amount of paperwork and documentation is required to ensure organic integrity. It is one of the necessary challenges of being a certified-organic farmer or rancher. For instance, many kinds of equipment and storage areas employed in organic production must either be dedicated to organic use or properly cleaned between conventional and organic use, and this must be documented. Recordkeeping is a challenging requirement for many organic farmers and ranchers, but allows potential access to an expanded market.

— [THE \$5,000 EXEMPTION] —

If you market less than \$5,000 worth of organic products annually, you are not required to become certified, although you have the option of doing so. The farming or ranching operation must still follow the federal standards for organic production, product labeling, and handling. If you chose to operate under the exemption, there are two constraints:

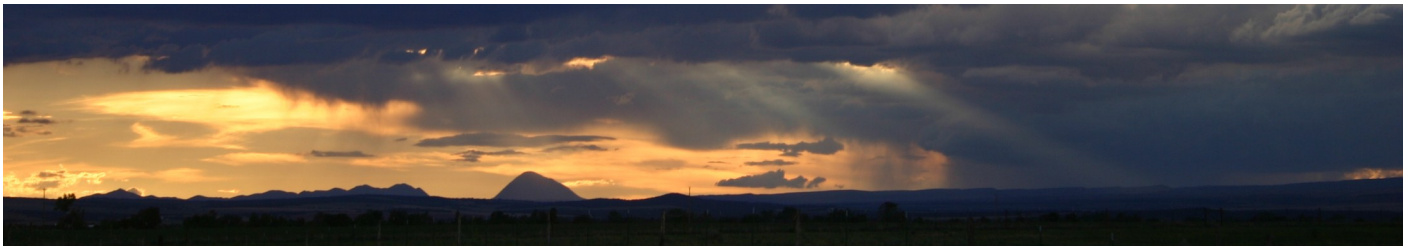
1. You may label your product as organic, but you may not use the USDA seal, the seal of a certifier, or otherwise claim that your production is certified;
2. You may not sell your products as ingredients for use in someone else's certified -organic product.

IS NOP ORGANIC CERTIFICATION RIGHT FOR YOU?

If you think NOP organic certification may work for you and help you reach organic markets, review the factsheet “Steps to Becoming Certified” included with this publication and see the online resources.

If you are interested in pursuing certification as a group of producers, see the box below on Group and Co-op Certification.

If you would like to explore “Alternatives to Organic Certification,” see that publication on our website.



GROUP AND CO-OP CERTIFICATION

Group organic certification is a way to make organic certification accessible for some traditional farmers who would otherwise be unable to afford it. Organizing farmer cooperatives is a useful and cost effective way to apply for organic certification and develop organic programs in Native communities. Farmer co-ops and group certification are central to expanding access to organic and traditional foods without overwhelming the producer. As demand for products such as blue corn, non-GMO chile, and organic wool continue to grow nationally and globally, co-ops and group certification give buyers greater access to quality organic products grown by traditional farmers.

Farmer co-ops are also a way to empower farmers to work together on issues like biodiversity conservation and to access group training in organic growing techniques, development of alternative markets, diversification on the farm, improving crop quality, and community-based agrotourism projects.

FOR MORE INFORMATION

Find online resources for this tool, as well as additional tool booklets on other community food topics, under “Food System Tools” at www.healthycommunityfoodsystems.org or www.HCFS.org



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