

BAYSTATE ORGANIC CERTIFIERS SEED AND PLANTING STOCK GUIDANCE DOCUMENT FOR ORGANIC FARMERS 1/21/13

Organic Seed Requirement

Section 205.204 of the National Organic Standards specifies that certified organic farmers must use organically grown seeds in order to grow an organic crop. However, this section of the standards also specifies that non-organic untreated seed may be used to grow an organic crop if organic seeds are not commercially available. Commercially availability is further defined as not being able to locate organic seed in the form, quality, or quantity needed.

What does this mean in practice? It means that certified organic farmers must use organic seed to grow a crop if the variety of the seed they need is available in an organic form from a commercial source. It does not mean that you have to buy organic seed from catalogs for organic gardeners unless you want to. It also means that if a specific variety of seed is not available organically, and there is no equivalent variety available organically, you may purchase non-organic untreated seed of the variety you want, but you do have to prove that you looked for the organic seed. Price may not be used as a determinant to use non-organic untreated seed over organic seed. Only form, quality, or quantity may be used as criteria for purchasing non-organic over organic seed. However, quantity may sometimes substitute for price. For example, if organic seed is only available in 4 oz packets, but you need to buy 5 lbs, you don't have to buy twenty 4 oz packets of organic seed. In this case, it is perfectly acceptable to buy 5 lbs of non-organic untreated seed. Often overlooked, quality may be used as criteria for purchasing non-organic untreated seed over organic seed, but only in very limited circumstances. If you switch seed suppliers in order to go from a non-organic to an organic seed source, the first year you switch suppliers there is always some concern that the new seed will match the germination and crop performance of the old seed. In this case, it is acceptable to trial the organic seed, and grow a crop from the non-organic seed. However, if the trial works, you will have to switch to the organic seed, but you don't have to risk crop failure with new seed if you are concerned with germination and performance issues.

Organic Seed Sources

On our website www.baystateorganic.org is a list of organic and non-organic untreated seed sources. These include the following. Fedco Seeds, Harris Seeds, High Mowing Seeds, Johnny's Selected Seeds, New England Seed Co., Seed Saver's Exchange, Seeds of Change, Seedway Inc., Snow Seed, Territorial Seed. Other sources include Abundant Life Seeds, and Blue River Hybrids (alfalfa, grain, field corn, soybeans). If you have any other organic seed sources that you would like to see listed on our website, please email us the name of the company.

Pelletized Seed

If you are purchasing pelletized seed, either lettuce, carrots, or any other crop that is normally pelletized, the material used to pelletize the seed must be compliant with the organic standards. This means that most pelletized non-organic seed is not allowed in organic production. However, there are some seed suppliers that do offer pelletized seed that meets the organic standards. The companies that offer organic or non-organic untreated pelletized seed that meets the organic standards include Harris Seeds, High Mowing Seed, Johnny's, and Snow Seed. Please make sure that if you are ordering pelletized seed from any of these sources, that you make sure you order the organically compliant pelletized seed. If you want to order pelletized organic seed from companies that are not listed above, please make sure that you verify that the pelletizing material meets the standards before you order the seed.

Seed Treatments

Seed treated with synthetic fungicides or other substances is prohibited in organic farming. However, seed may be treated with any substance listed on the National List as allowed for organic crop production (section 205.601 of the standards). Realistically the only seed treatment that is allowed by section 205.601 of the standards is chlorine. Baystate Organic Certifiers hasn't seen a lot of seed being marketed as being treated with chlorine, but we have seen it occasionally. If you do run across it in your seed ordering, chlorine is an allowed seed treatment.

Legume Inoculant

Many growers use legume inoculants. Legume inoculants are allowed by the organic standards as long as they are from nonsynthetic sources and are not from genetically modified organisms. Inoculants marketed by Fedco and Johnny's have been approved by Baystate Organic Certifiers for use on organic farms. If you are using a legume inoculant from another source, then you are responsible for verifying that the inoculant is allowed under the organic standards. Please contact our office if you need assistance with verifying any inoculant.

Annual Seedlings

Annual seedlings must be from an organic source. That means that you must grow the seedlings yourself, or purchase them from someone who is certified organic. You may not purchase seedlings from organic growers that are exempt, gross less than \$5000 annually and are not certified, unless you can demonstrate to Baystate Organic Certifiers that the exempt grower is in compliance with the organic standards. Proof of compliance must show that organic seed was used, or was unavailable, and that all substances and practices used in producing the seedlings is in compliance with the standards. Baystate is interested in putting a list of certified seedling producers on our website. If you produce seedlings for sale, and want to be listed on the website, please email us your contact information, and any information you have about your seedlings, and we will post it on the website.

Onion Seedlings from Dixondale Farm, Johnny's or any other source

Some growers have asked about using onion seedlings from Dixondale Farm, or Johnny's to grow an organic crop. Unfortunately, these seedlings are non-organic and may not be used to grow an organic crop. The only non-organic planting stock that may be used to grow an organic onion crops are onion sets (unsprouted bulbs). If you find an organic source of field dug onion seedlings, you may use them to produce an organic crop. As far as we know, there are only small suppliers of organic field dug onion seedlings in the U.S. As Baystate becomes aware of these sources, their names are posted on our website.

Planting Stock

Certified organic farmers must use organic planting stock to grow an annual crop unless it is not commercially available. Planting stock as defined by the standards is "Any plant or plant tissue other than annual seedlings but including rhizomes, shoots, leaf or stem cuttings, roots, or tubers, used in plant production or propagation." The most common planting stocks used to grow annual crops are seed potatoes, sweet potato slips, onion sets, shallot and garlic bulbs, and strawberries grown as annuals.

Using Non-Organic Planting Stock to grow an Organic crop

If you cannot find organic planting stock, you may use non-organic stock to grow an organic crop. To use non-organic planting stock to grow an organic crop, you must first search for organic planting stock by checking Fedco Seeds, The Maine Potato Lady, Johnny's, Deep Grass Nursery and other sources of organic planting stock. A general internet search for the organic planting stock should be done as well. Once you have determined that organic planting stock is not available in the form, quantity or quality you need you must ask Baystate to approve the use of the non-organic planting stock by filling out page four of the Seed Information Form or contacting us directly. In order to get approval you need to provide the following information: the quantity, source, and variety of the planting stock you want to use, along with a description of the attempts you made to find organic planting stock. Baystate Organic Certifiers monitors planting stock every year, so we have a good idea of what is available and what isn't, so it is very easy to get approval if you have checked the usual planting stock sources.

Potatoes

Organic seed potatoes are available from the NOFA Bulk Order, Fedco – Moose Tubers, The Maine Potato Lady, and Ronniger LLC. These are all sources for commercial growers rather than gardeners. Many varieties of potatoes are offered organically, but not all of them. Also, many times growers order organic potatoes only to be shipped non-organic seed as a replacement, so even though organic seed potatoes are widely available, approvals will be granted for varieties that are not offered organically, or for shortages of organic seed. If you are growing large wholesale amounts of potatoes, then you will have to look beyond these sources and probably have to buy direct from brokers in Colorado or Maine.

Sweet Potatoes

Baystate Organic Certifiers is unaware of a large commercial source for organic sweet potato slips. Limited varieties and quantities of organic slips are available from small producers that you can find on the internet. Approvals for using non-organic slips will be granted if growers can prove that they cannot get the varieties or quantities they need from the limited sources available.

Onion Sets, Shallots, and Garlic

Organic onions sets and organic shallot bulbs are not widely available. Limited quantities of organic shallots have been sold through Fedco and Peaceful Valley Farm Supply but availability is very limited at best. Organic garlic is widely available in the fall from large commercial seed houses, small growers across the country, and even some Baystate certified growers. Baystate will approve the use of non-organic garlic if a specific variety is not available organically, but this doesn't happen very often. If you are a Baystate certified grower that wants to be listed as a source of organic garlic on our website, please email us your contact information and information about your garlic.

Strawberries grown as annuals

Most strawberries are grown as perennials and therefore subject to the planting stock rules for perennials. However, some growers plant strawberries in September, and want to harvest a crop the following June, before the 12 month period of organic management for perennials has elapsed. Baystate will approve your use of non-organic planting stock for fall planted strawberries as long as the grower has searched for organic strawberry planting stock before applying for approval. Baystate is unaware of a commercial source for organic strawberry planting stock at this time.

Perennials

Section 205.204 of the National Organic Standards allows for the use of nonorganically produced planting stock for perennial crops, as long as the planting stock has been managed organically for a period of no less than 1 year before the crop harvested from the planting stock is marketed as organic. That means that you may purchase fruit trees, strawberry, raspberry, blueberry, and other berry planting stock, and perennial herbs like rosemary from non-organic sources. You do not have to get approval for this. You simply have to disclose that you are doing it in your Organic Farm Plan.

Recordkeeping

Recordkeeping for organic seed and planting stock is very simple, and does not need to be any more complicated than showing the invoices for your seed and planting stock purchases to your organic inspector. If you use non-organic untreated seed, you should also keep any seed catalogs you look at when you are searching for organic seed, so you can prove that you looked for organic seed before buying non-organic untreated seed. If you do your seed search online, you only need a list of websites you searched for organic seed.

The NOP has directed certifying agents like Baystate Organic Certifiers to verify that our growers are using non-organic seed only when organic seed is not commercially available. Some groups are lobbying the NOP saying that growers are not buying organic seed when it is available. Baystate has been monitoring seed purchases by our certified farms since 2002, and we don't see any merit to this complaint. Most of the growers we certify are using a significant percentage of organic seed. Some are using 100% organic seed. Others are using non-organic seed because the varieties they want for their specific growing conditions are not available, or because they have had germination or crop problems with organic seed, a problem that continues to affect the organic seed industry. In order to comply with the NOP directions on verifying seed, we will be asking you to either submit a list of non-organic seed you purchase when you apply or certification, or to have a list available at your annual inspection. You do not have to go to the trouble of making a list, but we know that many of you have lists and spreadsheets of seed purchases, so we will accept them if you have them. If you don't have a list, we will ask to see your seed invoices.

If you have any questions about organic seed or planting requirements as a certified organic grower, please call or email our office.