



# Common Mistakes Made by Organic Certification Applicants

Organic certification can be a complicated and confusing process. The many small details that need to be remembered, as well as slight changes to the regulations, can cause a variety of "mistakes" for new and experienced organic farmers. This list is compiled so you can learn from the mistakes others have made.

## Relations with certification agent

- Failure to complete required paperwork on time, or at all. Pay attention to deadlines.
- Failure to submit requested documentation to the certifier (such as prior land use forms, non- GMO letters, adjoining land use forms, water test results, etc.)
- Not understanding and/or not complying with certification requirement compliance issues noted from the previous year.
- Getting a product or practice used in your production approved by a certifier, but not getting the approval in writing, and then misunderstanding the "approval". Materials may be allowed for specific uses but not for other uses. For example, hydrated lime is allowed for plant disease control, but not as a soil amendment.
- Failure to pay certification and/or inspection fees.

## Non-approved inputs

- Use of non-approved substances (including synthetically treated or GMO seeds during transition years) due to negligence and/or not understanding the requirements.
- Use of non-approved substances due to trusting an input supplier who gave assurances that the material was "approved" for organic farming (always verify the acceptability with the certifier!)
- Failure to inquire and maintain documentation about the non-GMO status of inputs, including seeds, inoculants and Bt products.
- Incorrect calculation of the amount of time from the last date of prohibited inputs used. (36 months prior to organic harvest required). The farmer wrongly believes that the present year's crop will be salable as certified organic, when it is not certifiable.
- Not feeding certified organic feed to brood cows when they are in their last third of gestation for a future organic slaughter animal. For organic spring calves, the farmer should have his previous year's hay crop certified, so brood cows are eating certified organic hay in late winter.

## Documentation of approved inputs

- Failure to obtain complete ingredient documentation for purchased inputs.
- Confusion over the need to use organic seeds, when commercially available. The farmer must document how they tried to buy organic seeds, if they used untreated nonorganic seeds. Organic seeds are certified organic. Be aware that some seed dealers refer to the nonorganic seeds as "organic", since they are allowed in organic production, when an equivalent organic variety is not available. Check all seed tags and bags when receiving seeds to make sure you get what you requested.
- Failure to have documentation that off-farm manures did not contain treated wood beddings, non-approved synthetic lagoon additives or prohibited herbicide or insecticide use on the manure piles.

## Record keeping

- Lack of adequate detail or readability of field maps, use of inaccurate maps.
- Field maps that do not show acres, field numbers, borders and/or adjoining land uses. Maps and histories should correspond with field numbers and acreages.
- Not keeping field activity records up to date.
- Failure to keep seed and other input labels and receipts in an organized and accessible manner.

- Failing to keep records for contracted services, such as planting, spraying, harvesting, and/or trucking.
- Failure to keep bin records up to date.
- Not recording field numbers on harvest and/or storage records.
- Not using lot numbers or not using a consistent lot numbering system. (Use of a lot number is mandated under the regulation for all bulk organic sales).
- Not providing adequate certification documentation to buyers when organic products are sold.
- Not keeping records of steps taken to clean and inspect custom planting/harvest equipment or transport units.
- Not maintaining adequate input, harvest, equipment use, storage and sales records for operations with both organic and conventional production.

### **Organic plan**

- Failure to follow the operation's organic system plan. The certification application covers all aspects of the operation and this is verified during the organic inspection.
- Filing "update" farm plans with entries marked "No Change", when there have been significant changes, such as new leased or purchased fields, discontinued leases, sub-divided fields, new crops, new inputs, changes to field numbers, changes to lot numbering system, etc.
- Failure to keep copies of all paperwork submitted to the certifier. This is all part of your audit trail.

### **Commingling and contamination**

- Failure to properly clean harvesting equipment and/or storage units, resulting in commingling or contamination of organic crop.
- Failure to segregate crops harvested from buffer zones. Failure to properly document that the harvest, storage, sales or use did not commingle the buffer harvest with the organic crop.
- Lack of cleaning logs for spray equipment that is also used for prohibited inputs.
- Storage areas should be clean and free of prohibited pest control products.
- Work area contamination during post-harvest handling (e.g. washing vegetables, cutting vegetables, and packing vegetables, etc.)
- Mislabeling or mishandling of crop by workers who are not fully informed of organic certification requirements.
- Misapplication of prohibited materials by workers who are not fully informed of organic certification requirements.
- No GMO drift management plan- not knowing where the nearest GMO fields are located.
- Failure to inform highway departments, utilities, aerial sprayers and/or other entities, where applicable, that land adjacent to organic fields should not be sprayed with prohibited products (or sign no-spray agreements when these are available).
- Failure to post no-spray signs when and where these would add protection.
- Always check with your certification agent if you are unsure about organic requirements or to verify products you may apply to your organic land or crop. With organic certification it is always better to be safe than sorry.

*Information developed by the Midwest Organic and Sustainable Education Service (MOSES)*