

Baystate Organic Certifiers
c/o Don Franczyk
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Enclosed is the application packet for the Baystate Organic Certification Program. Please familiarize yourself with the National Organic Standards, and with Baystate's policies and procedures, prior to completing the application forms. The Standards can be found on the Baystate or National Organic Program websites. Both the Standards and Baystate's Policies and Procedures are combined into our Program Manual which can be found on our website. Becoming familiar with the National Organic Standards, and Baystate's policies and procedures, will help answer many of the questions you are sure to have. The completed application packet including attachments, constitutes an Organic System Plan. You only need to submit the entire plan once. After that growers renewing their certification will submit a much shorter update plan and will only have to submit maps and other documentation for new fields. An electronic version of these forms is available. The electronic forms are available for download at www.baystateorganic.org or contact our office to have electronic copies emailed directly to you.

You can apply for certification at any time. However, we encourage you to apply for any one of the three spring application deadlines. There are three different deadlines for application: February 15th, March 15th, and May 1st. These dates refer to the postmark of your application. These deadlines correspond to notification dates for certification decisions. Applications received before February 15th will receive their certification decision by May 1st. Applications received before March 15th will receive their certification decision by June 1st. Applications received before May 1st will receive their certification decision by July 15th. Applications received outside of these deadlines will receive a certification decision after their organic certification inspection has been completed. This process can be expedited to a matter of four weeks to six weeks for operations that are prepared for inspection and certification. If you require expedited certification, call the Baystate office as soon as possible in the application process, so we can arrange to have an inspector ready to inspect your operation.

We have also included a checklist for filling out the application packet. Following this checklist will guarantee that your application packet is complete when you submit it. All business related information on the application forms will be kept strictly confidential. If you have any questions about the application forms, or whether specific questions apply to your operation, feel free to contact any of the Baystate representatives listed on our website, and we will do our best to answer your questions. Some applicants find filling out the paperwork overwhelming. Though Baystate Organic Certifiers is prohibited from consulting with our clients, you can set up a telephone conference where we can answer all of your questions about the application forms.

Once your application has been received, you will be notified of its receipt and whether it is complete. If the application is incomplete, you will be given a list of missing paperwork needed to make it complete. Your application will then be technically reviewed to make sure your operation qualifies for certification. Once this review is complete, an inspector will inspect all aspects of your operation. Expect to spend two to four hours with the inspector. Once the initial inspection report is filed our staff will review the report and decide if your operation meets the certification standards. If there are any issues or noncompliances you will be given a chance to correct them. Organic Certification is valid for one year and must be renewed annually. Should you disagree with Baystate Organic Certifier's decision

concerning your operation, you may appeal that decision according to the process detailed in the Standards.

The National List of allowed organic inputs that is located in the organic standards and the Baystate Organic Certifiers Program Manual does not have a list of brand name products you are allowed to use. However, once a year we will send you a list of materials and products compiled by the Organic Materials Review Institute (OMRI) that are approved for use in organic production. OMRI publishes both a generic list of approved materials and a list of approved brand name materials, and you may use these lists as guidance documents for determining if a product may be used on your organic crops. You are not limited to the products on the OMRI list, however, if you choose to use a product that is not on the OMRI list you must prove that it is allowed under the regulations of the National Organic Program. Baystate evaluates local compost and potting soil producers that meet the requirements of the National List. Check our website for a list of approved compost and potting soil providers or call a Baystate representative to verify if a local compost or potting soil has been approved by Baystate. Additionally, all products on the NOFA Bulk Order have been reviewed and approved and may be used on your farm.

Attached to this letter are some clarifications about Seeds, Seedlings, and Planting Stock. Please read this information before completing your application. Feel free to contact us with any questions or concerns, and thank you for your interest in organic certification through Baystate Organic Certifiers.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Franczyk', written in a cursive style.

Don Franczyk
Executive Director

BAYSTATE ORGANIC CERTIFIERS SEED AND PLANTING STOCK GUIDANCE DOCUMENT FOR ORGANIC FARMERS

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. Commercial 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 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 searched for the organic seed. Only form, quality, or quantity may be used as criteria for purchasing non-organic over organic seed.

Price of organic seed may not be used as a determinant to use non-organic untreated seed 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 or Pelleted Seed

If you are purchasing pelletized or pelleted seed (i.e. lettuce, carrots, herbs, flowers, or any other crop that is normally pelleted), the material used to pelletize the seed must be compliant with the organic standards. This means that most pelleted 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. If you are ordering pelleted seed from any sources, make sure you order the organically compliant pelleted seed. If you want to order pelleted organic seed from companies that are not listed above, 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 (section 205.601) as allowed for organic crop production. Realistically the only seed treatment that is allowed by section 205.601 of the organic standards is chlorine. Any seed purchased with a treatment applied to it must be approved by Baystate prior to use.

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. If you are using a legume inoculant, 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 gross less than \$5000 annually and are not certified, or growers that are not certified organic. 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. If you purchase onion seedlings from a

certified organic supplier you must provide proof that the supplier is certified.

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.

Commercial availability

If you cannot find organic planting stock, you may use non-organic stock to grow a crop if you get permission from Baystate Organic Certifiers to do so. Annual planting stock, both organic and non-organic, gets listed on the Seed Information Form. In order to get permission to use non-organic planting stock you need to list your non-organic planting stock on the Seed Information Form, and what 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 permission to use non-organic planting stock 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, waivers 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 Deep Grass Nursery and other sources that can be found on the Internet. Waivers for 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. If you do purchase non-organic slips, you must have proof on file that the slips are untreated. We understand that the slips will have been grown from plants that have been managed organically, but the slips themselves may not be treated with prohibited substances and certified growers are responsible for documenting that the slips are untreated.

Onion Sets, Shallots, and Garlic

Organic onion 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. Waivers

are granted for 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 grant a waiver for fall planted strawberries as long as the grower has searched for organic strawberry planting stock before applying for the waiver.

Perennials

Section 205.204 of the National Organic Standards allows for the use of nonorganically produced planting stock for perennial crops. The non-organic perennial planting stock must be managed organically for a period of no less than 12 months before planting stock may be 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. Perennial planting stock from all sources must be listed on the Seed Information Form.

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 a list of sources you searched when looking for organic seed, so you can prove that you performed an adequate search 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. 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 for certification, or to have a list available at your annual inspection. 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.