



Producers' Frequently Asked Questions

The following is intended to answer questions you might have about the MOSA certification process. If you have any other questions, call our office weekdays between 8am and 5pm at (608) 637-2526, or email us at mosa@mosaorganic.org.

GENERAL CERTIFICATION:

Q: Where does MOSA certify?

A: MOSA offers certification services throughout the United States and abroad, with a strong focus on the upper Midwestern United States.

Q: What types of operations will MOSA certify?

A: MOSA offers organic certification services to all interested parties for general crop production; specialized crops such as mushrooms, greenhouse, sprouts, maple syrup, and hydroponics; livestock production such as milk, meat, and eggs; wild crops; and processors/handlers of many types. We can also provide additional verification services to meet special market needs such as JAS and EU 2092/91.

Q: How long does the certification process take?

A: New certification requests are treated as priorities. However, the time necessary for the certification process can vary depending upon the time of year when the application is received. New applicants should plan on allowing at least three months to get through the process. Delays in submitting requested information or fees to MOSA could result in a longer process or possible termination of the certification process altogether. Also, because compliance of your operation must be verifiable at the time of inspection, your inspection may be delayed to ensure that you are inspected at the right time of year for your type of operation.

Q: What if I live in a state with a USDA-approved State Organic Program (SOP)?

A: An operator located in a state with an approved SOP is subject to the requirements of the SOP. For the most part, MOSA's requirements are equivalent to those of SOP's, because all SOP's and private certification agents are approved/accredited by the USDA and must be compliant with the USDA's National Organic Program. In some instances, however, the USDA may approve an SOP's request to have more restrictive requirements for organic certification. In these cases, MOSA informs you of the SOP's more restrictive requirements. (See the SOP insert in your application packet.) MOSA must evaluate your operation and make the certification decisions according to these SOP requirements.

Q: What do I do if my marketing agency tells me to follow different procedures than those stated by MOSA?

A: If you have any questions or are unsure about how to handle a situation, do not hesitate to call the MOSA office to ensure that the information you obtained is correct. Though they may be helpful to you in regard to organic production, marketers may not be fully informed on requirements for certification. Another aspect of this is that while operations must meet the National Organic Standards to become certified, MOSA can provide verification that additional or higher requirements have been addressed.

Q: I want to become more involved. What can I do to help?

A: MOSA encourages involvement by interested individuals in the continued positive development of the MOSA organization. MOSA solicits qualified, interested individuals from the organic community to fill openings on the MOSA Nominating Committee or the MOSA Advisory Committee. Anyone interested in supporting MOSA's focus on organic agriculture can pay a fee of \$50 to become a MOSA Supporter. MOSA certified operators are also encouraged to submit to the MOSA office any articles of interest or pictures that would be appropriate to share in the MOSA newsletter, *The Organic Cultivator*, and to display on the MOSA website.

COST OF CERTIFICATION:

Q: How much does it cost to get certified?

A: The certification cost for the first year is between \$200-\$300, plus the cost of inspection. After the first year, it would be \$150-\$250/year plus inspection costs. Please see the Producer Fee Schedule for a complete listing of all fees. With your application you pay a deposit on the cost of your inspection along with certification fees. When your inspection is complete, you will be notified of any balance due for inspection costs. When certified sales take place, you will also be required to pay user fees to MOSA

Q: How does the user fee payment work?

A: Many certification agents require a large up-front payment from producers based on projected sales. MOSA has developed a user fee system which allows Associates to pay fees based on completed sales, reducing up-front costs. User fees are .75% for producers, which is 75 cents on \$100 of organic sales. Most milk producers have their milk buyer pay user fees directly to MOSA. Other producers can either pay user fees by the Transaction Certificate sale (if TC's are used for all sales) or report their sales quarterly.

Q: What is the Transaction Certificate (TC) system, and how does it work?

A: The Transaction Certificate System provides organic certificates for individual organic sales. These are not mandatory for crop and livestock or other product sales, but they provide the best type of organic verification available for both you and the buyer. The seller fills out the Transaction Certificate Authorization Form, or TCA, provided by MOSA and sends it to MOSA. MOSA then sends a Transaction Certificate (TC) to both the buyer and the seller. As a seller, the TC provides you with sales documentation. As a buyer, the TC is your proof that what you purchased was grown and handled in accordance with the National Organic Standards.

LAND REQUIREMENTS:

Q: How do I know if my land and crops qualify to be certified organic?

A: To be eligible for organic certification, your land must be free of prohibited materials for at least 36 months prior to the harvest of a crop intended to be certified organic. Prohibited materials include a wide variety of fertilizers, herbicides, insecticides, fungicides (including treated seed), and growth regulators, as well as genetically engineered organisms, including some seed and seed inoculants. In addition to demonstrating that you have met the input requirements, you have to be able to demonstrate that your land or crop has not been subject to contamination from adjacent land use and that your management meets the National Organic Standards.

Q: The input product I want to buy says it is "organic" or "all natural", but how can I be sure it is okay to use?

A: Some fertility, pest, and disease control products may claim to be "organic" or "all natural" though they don't meet NOP regulations. All ingredients in a product, including inert ingredients and processing aids, must be allowed for the product to be acceptable for use. As certification can be jeopardized by use of unacceptable

products, MOSA strongly encourages applicants to use products listed by brand name on the OMRI Brand Name Products List (following all NOS annotations/restrictions), or to call the MOSA office with any questions about the acceptability of a product.

Q: Can I spread conventional manure on organic land?

A: In most cases, conventional manure is allowed for use on organic land, if non-GMO verification of manure additives can be obtained. We also require statements from conventional poultry operations to verify that birds were not fed arsenic. Any bedding material in the manure must be verified to not contain prohibited materials. If you are requesting certification for EU export, the EU 2092/91 Standards do not allow factory-farm manure to be used on organic land. Potential problems exist where manure is sourced from operations that routinely feed antibiotics or that use manure additives.

Q: The composting requirements in the National Organic Standards are very strict. Do I need to adhere to these? Do I have to compost my manure?

A: It depends. First of all, consider manure handling requirements. If you are applying manure to crops for human consumption, you must meet the following requirements:

- You apply the manure more than 90 days prior to harvest of a crop for human consumption whose edible portion does not come in contact with the soil surface or soil particles.
- You apply the manure more than 120 days prior to harvest of crops for human consumption that are exposed to contact with soil surface or soil particles.

If these requirements are not met, then the manure applied must be composted according to the National Organic Standards. If you are growing crops that are not for human consumption the time requirements do not apply.

Composting is a sound practice in nutrient management but it is not required. Manure must be handled in such a way that it does not pose a threat to natural resources. Winter manure spreading is allowed only when the manure management demonstrates this.

Q: I have rented or purchased certified organic land that has been certified by another operator. Can I produce certified organic crops on this land without going through the certification process myself?

A: No. The certification process also evaluates the ability of the individual to manage his/her operation in compliance with the NOS and MOSA certification requirements. If you purchase land that was previously owned by a certified farmer, you must certify this land under your own name by submitting completed questionnaires, forms and fees as appropriate before you can harvest certified crops from the land.

SEED REQUIREMENTS:

Q: Do I have to use organic seed?

A: Many types of seed are available as organically-produced, some types of small grains and specialty crops are harder to find at this time. The National Organic Standards state that organic seed is required. However, if not available, producers document their seed search efforts, noting where they tried to source each variety of seed, date, and reason that seed was not available. When equivalent organic seed varieties are documented to not be commercially available, a producer may use untreated, non-GMO, conventional seed. Seed receipts and sample tags (if needed to verify untreated status) will be reviewed at each annual inspection.

Q: *Where can I find organic seed or seed suppliers?*

A: The *Upper Midwest Organic Resource Directory*, which is included in the MOSA application packet, contains a list of seed suppliers in the Upper Midwest. This booklet, published by the Midwest Organic and Sustainable Education Service (MOSES), is a good place to start your search. A list of seed suppliers is also available on the MOSA web site. Please note that MOSA does **not** endorse all products of individuals and organizations listed in this directory. Always check with MOSA to ensure that a product is acceptable before using it. Other websites to search for organic seed include www.attra.org and www.omri.org.

Q: *Do cover crop and plow down seeds need to be organic too?*

A: Yes. Producers need to make the effort to source organic seeds, including cover crop, plow down, annual crop seed, and perennials. Sourcing seed means searching for organic seed in more than just one place, for example, calling several seed dealers/looking in catalogs for each variety of seed needed. This means that whether you are growing 25 different kinds of hot peppers or 1 type of alfalfa, you need to try to find the variety, quantity and maturity date as organic seed. If seed is not commercially available in the variety, maturity date and/or quantity you need, then untreated, non-organic seed can be used. For audit trail paperwork, save all your seed tags, receipts and written seed search documentation. Producers should note that seed produced on non-organic land (buffers and transitional land) cannot be used for planting on organic fields unless organically grown seed is not available.

Q. *How does the National Organic Program (NOP) interpret “equivalent variety” in 7 C.F.R. 205.504(a)(1-2)?*

A: An equivalent variety means a variety exhibiting the same “type” (such as head lettuce types, leaf lettuce types, etc.) and similar agronomic characteristics, such as insect and disease resistance, when compared to the original varietal choice.

“Type” is defined by the Federal Seed Act of 1939 (7 U.S.C. 1551-1661.) as either (A) a group of varieties so nearly similar that the individual varieties cannot be clearly differentiated except under special conditions, or (B) when used with a variety name means seed of the variety named which may be mixed with seed of other varieties of the same kind and similar character, the manner of and the circumstances connected with the use of the designation to be governed by the rules and regulations prescribed under section 1592 of the Federal Seed Act.

“Variety” is defined by the Federal Seed Act as a subdivision of a “kind” which is characterized by growth, plant, fruit, seed, or other characters by which it can be differentiated from other sorts of the same kind; for example, Marquis wheat, Flat Dutch cabbage, Manchu soybeans, Oxheart carrot, and so forth. “Kind” means one or more related species or subspecies which singly or collectively is known by one common name, for example, soybean, flax, carrot, radish, cabbage, etc.)

LIVESTOCK:

Q: *Can I transition my current slaughter animals to organic?*

A: No. All organic slaughter livestock must be from livestock under continuous organic management from the last third of gestation. Poultry must be managed organically from no less than the second day of life to qualify as organic slaughter.

Q: *How do I transition my dairy herd?*

A: Organic livestock are required to be managed 100% organically from the last 1/3 of gestation. However, the National Organic Standards allow a one-time exception to this requirement for new dairy herds. “One-time” means that a herd, once transitioned to organic status, cannot be taken out of organic production and then transitioned again. A dairy herd may be transitioned by:

1. One full year of 100% organic management and 100% certified organic feed, or
- 2 One year of 100% organic management with feed that is grown on land that has been managed organically and is in its third year of transition to organic production (at least 24 months free from prohibited inputs at the time of crop harvest). Third year transitional feed must be grown, not purchased. Any purchased feed during the transition would need to be certified organic. Feed supplements and inoculants used during the transition cannot contain any ingredients prohibited for organic production.

100% organic management during dairy herd transition means that no antibiotics, prohibited hormones or parasitocides may be used for the full 12 months prior to certification of the milk.

Producers who are transitioning a dairy herd to organic production by the second option (“third year transitional”) will ask, “When do I need to certify?” There are several things to keep in mind. One is that the feed that is to be fed at the completion of the transition period needs to be certified. This means getting an application for certification in and going through the certification process during the year the crop is grown. Another consideration is that unless new producers are getting help from other organic farmers or consultants who are sure of organic management requirements, they may not know what all is required in the way of organic management during the transition period. This is a new type of transition, just put into the rule June 7, 2006. MOSA is considering putting into place a “transitional application” which would not be a certification as such, but would allow transitioning operations to get an application in for initial review by our certification department so that mistakes during the transition year may be avoided. Please contact us if you would be interested in such a program.

Q: Once I'm certified, how can I increase the size of my milking herd beyond the growth allowed by my own dairy replacements?

A: This question is still in the process of further clarification by the National Organic Program. At this time, your options depend upon how you bring your herd into organic milk production. If you transitioned a herd by 100% certified feed for one year, you can transition more animals into your herd by 100% certified feed for a year or you can purchase animals certified for organic production. If you transitioned a herd by the 80/20 transition (no longer possible after 6/9/07), or by the new rule which allows 3rd year transitional feed, your only option is to purchase animals certified for organic production. If you purchased certified animals for your original organic certification, you still have the option of converting a herd or purchasing more certified animals.

Q: Can I use uncertified hay from a neighbor for my organic livestock if I know the neighbor has not used prohibited materials?

A: No. All feed purchased from off-farm for your organic livestock must be certified organic.

Q: I raise beef. When do I need to certify to sell organic beef, either as calves or finished?

A: If you purchase your feed, in the year you start feeding certified organic feed to your brood cows (which needs to be before the last third of gestation). If you raise your own feed, you need to be inspected and certified in the crop year in which it's grown in order for it to be certified organic feed.

Q: What if my organic animal is not responding to a preventative health care treatment or an allowable health care treatment – what can I do?

A: An organic livestock producer can not withhold medical treatment from a sick animal in an effort to preserve its organic status. Per the National Organic Standards, “All appropriate medications must be used to restore an animal to health when methods acceptable to organic production fail.” Operators must clearly identify livestock treated with prohibited inputs and note the treatment in the animal's health records.

Q: *Can I use treated wood?*

A: Maybe. Per the NOS, wood treated with prohibited substances is not allowed for new installations or replacement purchases when it would be in direct contact with organic land or livestock. There are different kinds of wood treatments on the market, of which some may require little if any buffering to land or livestock. Naturally rot-resistant woods are preferred.

INSPECTION PROCESS:

Q: *How can I prepare for my inspection?*

A: The organic plan and the audit trail records are essential parts of certification and a large portion of your inspection will be devoted to them. The inspector will also tour your operation. For information on preparing your organic plan and your audit trail, see the Program Manual and the inspection checklist included in your application packet.

Q: *How long does the inspection last?*

A: On average, inspections last approximately 3 to 5 hours. This time may vary depending on size and complexity of the operation.

Q: *I have just been inspected. Am I now certified?*

A: No. Inspectors do not make certification decisions. After you have been inspected, your file will be reviewed by the Certification Review Team (CRT). When a decision has been reached, you will receive a letter in the mail notifying you of the certification decision, including any further information or corrections required of you prior to granting MOSA certification. Please see Section IV E of the MOSA Program Manual, *the MOSA At-A-Glance Certification Process Flow Chart*, for a further explanation of what is involved in the certification process.

Q: *I paid my initial inspection cost, so why am I being billed an additional amount?*

A: At the time of application, we collect a deposit for your inspection. Actual inspection costs vary depending on the geographical location of the operation, the availability of inspectors in relation to the area, the timing of the inspection, and the size of the operation. Inspections are assigned to inspectors with attention to keeping costs as low as possible. Following the inspection, you will receive an invoice for any difference between the down payment and the inspection costs.

Q: *Do I have any choice in organic inspectors?*

A: Though you may not request a particular inspector, you may request that a particular inspector not inspect your operation.

YOUR ORGANIC CERTIFICATE:

Q: *The person I work for is certified. Does this mean I am certified also?*

A: No. If your name is not on the certification application and the certificate, then your operation is not independently certified.

Q: *What is the “Certificate Effective Date”?*

A: This is the date that you first became certified with MOSA. This date will remain unchanged on your certificate though you annually update your certification with MOSA.

Q: Do I need to be inspected each year?

A: Yes. Certification and inspection is an annual affair. Update packets are sent out early in the year and must be returned with certification fees before May 1.

Q: If the date doesn't change on my certificate from year to year, then how will my buyer know my certificate is current?

A: The MOSA COPS (Certified Organic Products and Services) sheet is provided along with your certificate. The COPS addendum gives more detail about the individual products and services you have certified, as well as a current issue date. If your buyer needs additional verification, encourage them to call the MOSA office and we can verify that your certificate is current.

Q: Why is there not a current date of certification on my certificate?

A: Since April 21, 2002, when the National Organic Standards took effect, there is no such thing as an organic certification expiration date. Per NOS §205.404(c), "Once certified, a production or handling operation's organic certification continues in effect until surrendered by the organic operation, or suspended or revoked by the certifying agent, the State organic program's governing State official, or the Administrator." In other words, you are certified organic until you are decertified or don't want to be certified, as long as you submit update information and fees annually.

MORE

Q: What more can I find out about organic farming, certification and the MOSA Program?

A: If you have access to the internet, there are many websites that have information about organic certification. The USDA's National Organic Program website can be accessed at www.ams.usda.gov/nop. Within it you can find the National Organic Standards, including the National List of Allowed and Prohibited Products. The MOSA website, www.mosaorganic.org, contains a wealth of information including the MOSA Program Manual. If you are interested in certifying with MOSA, you can request our application packet at a cost of \$50. The application packet includes application forms, the National Organic Standards, the MOSA Program Manual, the OMRI Generic and Brand Name Material Lists, the Upper Midwest Organic Resource Directory, and sample record keeping forms.. Another resource for information about organic production is Midwest Organic and Sustainable Education Service (MOSES), a nonprofit organization that works to promote organic agriculture. MOSES is the sponsor of the Upper Midwest Organic Farming Conference held in La Crosse, WI in late February of each year. They also sponsor trainings for farmers and may be of help to you in other ways. To find out more, contact them at : MOSES, P.O. Box 339, Spring Valley, WI 54767; phone 715-772-3153; www.mosesorganic.org ; or email info@mosesorganic.org.

If you have any other questions about MOSA or organic certification in general, please call the MOSA office at 608-637-2526 or write to us at MOSA, PO Box 821, Viroqua, WI 54665 or visit our website at www.mosaorganic.org.