



PO Box 821, Viroqua, WI, 54665 Ph:(608) 637-2526 Fax:(608) 637-7032 mosa@mosaorganic.org [www.mosaorganic.org](http://www.mosaorganic.org)

## Apiculture: Initial Organic System Plan

Use this form to describe your operation. If some sections do not apply to your operation, check the "none" or "not applicable" boxes. Submit this plan, along with other needed forms and information, to MOSA as early as possible in the year you are requesting certification for your honey bee products. Allow ample time for review and inspection before certification is needed. Contact MOSA with questions. Attach additional pages if needed for descriptions.

Section 1 General Information						
<b>Primary Account Name</b>	<b>Date</b>	<b>For Office Use</b>		Rec'd	Initials	
<b>First Name</b>	<b>Last Name</b>	Office#	Grid #	Cert	Insp	Other

**Do you grow crops for bee forage?**  No.  Yes. **If yes, skip to Section 2. A Farm Organic System Plan will need to be completed and submitted along with this Plan.** Contact MOSA if you need a copy of the Farm OSP.

Other names associated with account		Farm Address			
First Name(s)	Last Name(s)	City	State	Zip	County
		<b>Mailing Address, if different</b>			
		City	State	Zip	
<b>Farm Name</b>	<b>Name(s) for certificate</b>	<input type="checkbox"/> primary name only <input type="checkbox"/> all of the above		<b>Phone Information</b>	<b>Do not publish</b>
<b>Email</b>	<b>Website</b>	<b>Home</b>		<input type="checkbox"/>	
<b>MOSA will communicate by email with your approval. Indicate what you can receive by email.</b>  <input type="checkbox"/> annual update forms <input type="checkbox"/> certification letters <input type="checkbox"/> organic certificate  <input type="checkbox"/> general communications <input type="checkbox"/> newsletters <input type="checkbox"/> financial communications		<b>Cell</b>		<input type="checkbox"/>	
		<b>Fax</b>		<input type="checkbox"/>	
		<b>Other</b>		<input type="checkbox"/>	
<b>Indicate if you want to receive optional OMRI materials by postal mail:</b> <input type="checkbox"/> Generic Materials List <input type="checkbox"/> Products List <input type="checkbox"/> both <b>For those who prefer electronic access, the OMRI Brand Name Products List is available at <a href="http://www.omri.org">www.omri.org</a>.</b>					

Section 2 General Description
<b>Do you have a copy of the ACA Apiculture Working Group Final Draft Apiculture Guidance Document of October 2009?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Do you understand the requirements for Organic Apiculture Certification using the above document as a guide?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No. <b>Explain:</b>
<b>MOSA needs to know your plans for selling organic honey bee products to get you certified in a timely way:</b> <input type="checkbox"/> I plan to sell organic honey bee products around _____. (date) if certified <input type="checkbox"/> no sales planned this year <input type="checkbox"/> I am certified with another agency until _____. (date) <b>Which agency?</b> _____
<b>What types of honey bee products are you requesting for certification? Check all that apply:</b> <input type="checkbox"/> Honey <input type="checkbox"/> Wax <input type="checkbox"/> Pollen <input type="checkbox"/> Propolis <input type="checkbox"/> Royal Jelly <input type="checkbox"/> Bee Venom

Have you ever been inspected or certified by another agency?  No  Yes. Which agency? \_\_\_\_\_  
 Attach a copy of your last certification letter and certificate from that agency.

Do you intend to certify with another agency this year (dual certification)?  No  Yes. Which agency? \_\_\_\_\_

Identify all programs for which you are requesting certification and/or verification:  
 NOP organic certification  EC/EU verification (additional form required)  JAS equivalency

Do you understand the requirements for this program and MOSA's fee structure for such certification or verification?  
 Yes  No. Explain:

Give directions to your farm/apiary. Include a map if needed.

Preferred contact time:  morning  afternoon  evening  
 Preferred contact method:  phone  postal mail  email Preferred inspection time:  morning  afternoon  evening

**SECTION 3 Apiary Operation Profile/Source of bees** ACA §§205.240(b)(1), .240(a)(1)-(3), .240(b)(5)

Provide addresses and maps of each bee yard or apiary. Include number of colonies in each yard this year. Provide history showing that no prohibited materials have been used in or around each site for 36 months.

Transition: For colonies present in your operation for one year or more, provide colony identification, date of purchase and date of foundation wax replacement in an attached document.

Replacement Colonies: For colonies purchased within the past 60 days such as nucs or packages (cannot be more than 25% of colonies present in the previous honey flow): provide colony identification, date of purchase and if applicable, date of foundation wax replacement in an attached document.

**SPLIT/PARALLEL PRODUCTION**

"Parallel production" is producing the same type of bee products conventionally and organically. "Split production" is both organic and conventional production on the same farm, but different bee products.  
 not applicable, all apiculture products are managed organically

Answer the following questions if you have conventional and organic production of apiculture products:

How do you prevent conventional bees from drifting into organic hives?

How do you prevent organic bees from robbing conventional hives?

**SECTION 4 Living Conditions** ACA §§205.240(a)(1), .240(h), .240(j)(5)

Describe source of foundation wax:

Describe hive and frame construction:

Describe hive stands and any winter or summer alterations to the hives.

Describe source of smoker fuel.

**SECTION 5 Feed and Feed Supplements** ACA §§205.240(b)(1)-(b)(3), .240(e)(1)-(2), .240(f)(1)

**A. FEED**

Provide a map of the forage zone showing land use in a 1.8 mile radius from each apiary location. Each map should include the location of organic and wild harvest land.

Provide a Map of the surveillance zone for an additional 2.2 mile radius from each apiary location beyond the 1.8 mile forage zone. Include any high risk activities in the surveillance zone such as sanitary landfills, incinerators, sewage treatment facilities, power plants, golf courses, GMO crops, towns or cities.

Provide a description of nectar and pollen source plants in the forage area and their densities. Provide a description or chart of their bloom periods.

Describe the placement of colonies and colony populations as they relate to forage area harvest capacity.

How do you verify that flowering fruit trees, flowering vegetable gardens, flowering or pollinating crops not under your control are managed organically or that there are no such crops growing within the forage zone?

aerial maps    Verification of Adjoining Land use documentation    other land owner documentation

**B. SUPPLEMENTAL FEED**

Do you provide your bees supplemental feed?  No    Yes. How do you monitor your colonies for sufficient winter or dearth time feed supplies?

*List all feed ingredients in a separate inventory or log and list date(s) of supplemental feeding within the past calendar year. Have information and labels available at inspection.*

**SECTION 6 Water**

ACA §205.240(b)(4), .240(e)(1)

List available water sources in the forage zone.

river/creek    pond    spring    other:

**SECTION 7 Health Management**

ACA §205.240(i)(1), .240(j)(1)-(3), .240(c)

The National Organic Standards require a production environment that promotes livestock health and limits livestock stress. **Livestock treated with prohibited materials and/or their products may not be sold as organic.** Records must be kept of all treatments.

**A. HEALTH OR DISEASE PROBLEMS**

Describe your queens and colony genetics as they relate to resistance to diseases and pests.

How do you monitor, and how often for Foulbrood, Sacbrood, Chalkbrood, Nosema, mite infestations, damaged wings, etc.?

Livestock health control products used or planned for use in the current year are to be noted on the Livestock Input Inventory. Provide ingredients information for all products that are not OMRI listed. Have purchase documentation available at inspection.

No health management products used

**B. PEST CONTROL**

Which pests affect your operation? Check all that apply:  Varroa Mite    Tracheal Mite    Small Hive Beetle    bears  
 small mammals    other:

How do you monitor for pests, and how often do you monitor?

Livestock pest control products used or planned for use in the current year are to be noted on the Livestock Input Inventory. Provide ingredients information for all products that are not OMRI listed. Have purchase documentation available at inspection.

no pest control products used

**C. PHYSICAL ALTERATIONS**

Do you clip wings on your queens?  Yes    No   Do you mark your queens?  Yes    No

**SECTION 8 Harvest and Post Harvest Handling**

ACA §§205.240(c)(12),.240(j)(6), .240(c)

What is your estimated harvest of honey and/or hive products per colony?

How do you remove bees from honey supers prior to harvest?

*Provide a map of your processing facility, including raw and finished bee-product or honey storage.*

List all uncapping, extracting and bottling or packaging equipment used.

Describe materials used in packaging or bulk storage of honey or bee products.

Do you add any ingredients to processed products?  No  Yes. Complete a MOSA Organic Product Profile for all products with added ingredients.

Provide information on cleaning procedures and any cleaning materials used where you process or store organic apiculture products.

Provide information on any insect or rodent control procedures and materials or traps used where you process or store organic apiculture products.

Describe harvest protocols for all other apiculture products.

**SECTION 9 Record Keeping**

ACA §§205.240(c)(8), .240(c)

How are individual colonies and apiaries identified?

Indicate which records you maintain to demonstrate your compliance with ACA Guidance. Check all that apply:

- Map of the forage zone
- Map of the surveillance zone
- Information on floral and pollen sources in the forage and surveillance zones
- Verification of 3 year land management history for the forage zone
- Documentation for sources of foundation
- Documentation that comb has been drawn out under organic management
- Documentation for introduced or raised queens
- Documentation of colony monitoring through the season
- Information and labels on inputs used and their applications
- Certification documentation for supplemental materials fed.
- Records of supplemental feeding dates
- Estimated yields per hive for all bee products
- Packaging and labeling information for bee products
- Sales records for bee products

## SECTION 10 Additional Information

The following information is also being submitted:

- |   |  |
|---|--|
| <input type="checkbox"/> Forage zone and surveillance zone maps   | <input type="checkbox"/> Most recent certification determination letter from previous certifier                      |
| <input type="checkbox"/> Information on Floral and pollen sources in the forage and surveillance zones. | <input type="checkbox"/> Proposed organic product labels, if used  |
| <input type="checkbox"/> Livestock Input Inventory and labels or ingredients information for inputs     | <input type="checkbox"/> Verification of Adjoining Land Use forms, if applicable                                     |
| <input type="checkbox"/> Processing/Handling, or Excluded Handler Organic Plan(s), as applicable        | <input type="checkbox"/> Prior Land Use Declaration, if applicable   |
|   | <input type="checkbox"/> Other forms of verification for organically managed flowering crops within the forage zone. |

## SECTION 11 Affirmation

I affirm that all statements made in my organic system plan are true and correct. No prohibited products have been applied to fields for which I am requesting certification during the three-year period prior to projected organic harvest. In addition to annual inspection requirements, I understand that my operation may be subject to unannounced inspection and/or sampling for residues at any time as deemed necessary to ensure compliance with the National Organic Standards. I consent to the use of subcontracted inspectors and laboratory analysis services as necessary, and hereby agree to a release of information from suppliers or service providers, should such be necessary to verify compliance.

I understand that failure to follow the National Organic Program or MOSA certification requirements or giving false information may result in denial, suspension or revocation of the certification of my operation. I understand that certification of my operation may depend on my ability to supply information that MOSA needs to evaluate my request for certification. I understand that acceptance of my organic system plan in no way implies granting of certification. I agree to follow the National Organic Standards and MOSA certification requirements.

If I am submitting this form electronically, I understand that an electronic signature has the same legal effect and can be enforced in the same way as a written signature. By typing my name below I am electronically signing this form.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Print Name \_\_\_\_\_

**Make copies of all organic system plans and supporting documents and submit with fees by mail to MOSA, PO BOX 821, VIROQUA, WI 54665 or electronically to [mosa@mosaorganic.org](mailto:mosa@mosaorganic.org)**



# Accredited Certifiers Association, Inc.

PO Box 472 ■ Port Crane, NY 13833

607.648.3259 phone / fax

[www.accreditedcertifiers.org](http://www.accreditedcertifiers.org)

## Organic Apiculture Guidance Document, Final Draft

10.30.2009

### Based upon

NOSB Apiculture Task Force Report Draft Organic Apiculture Standards

Compiled by James A. Riddle, ATF Chair September 15, 2001

## Introduction

The ACA Apiculture Working Group has developed this Organic Apiculture Guidance Document to assist organic producers and accredited certifying agents in determining appropriate practices for organic apiculture. The group reviewed several apiculture standards, and incorporated requirements from these in an effort to harmonize US standards with Canadian and European requirements. Members of the Apiculture Working Group have experience in certification and inspection of organic apiculture operations, and in several cases managing of apiculture operations. Participants in the Working Group represented the following ACA member organizations:

BCS Okeo Garantie

HOFA

MOFGA

MOSA

OneCert

OTCO

PCO

QAI

VOF

and in addition, Harriet Behar participated

The Apiculture Working Group is aware of the complexities of organic apiculture production, and consumer perceptions of organically produced products. The Group believes that organic apiculture must strive to meet the same level of strictness as other organic production requirements.

## Issues that the group discussed in detail included

- **The definition of forage zone**

The Group established a 1.8 mile radius from the bee yard as the forage zone for bees. This area can either be an agricultural area or wild crop area, and must be included in the producer organic system plan. It was acknowledged by the Group that residential areas within the forage zone could be problematic regarding the use of organically prohibited materials; however, the Group believes that producers must obtain an adjoining land use affidavit from the landowner stating no prohibited materials are used.

In addition, as the Group believes that bees may travel further than 1.8 miles, the producer must also monitor a surveillance zone for an additional radius of 2.2 miles beyond the forage zone area.

- **Transition period of one year**

The 2001 NOSB recommendation required 270 days as the transition period for hive. However, Canada and the EU regulations require one year. The Group decided that we did need to harmonize with the Canadian and EU regulations, and chose the one year transition time for the colony and the hive equipment. It was discussed among the Group that since bees do not normally survive a full year, it was not necessary to establish this extended time. However, it was also discussed that organic beekeeping can have a steep learning curve, and the one year time would permit the beekeeper to develop management practices to address organic production. The Group also believed that since hives may have been treated with prohibited materials prior to transition to organic, all foundation wax must be new at the start of the one year transition. Other existing equipment, such as hive bodies and frames may be used in the organic production.

- **Replacement bees**

This topic was *the* most discussed topic of the Group. The majority of the Group believes that organic beekeepers must develop a management system that encourages bee health, including overwintering. Organic beekeeping prohibits the intentional killing of a colony after removal of the honey, and then purchasing packaged bees to re-start the colony in the spring. It was noted that packaged bees have been exposed to several prohibited materials prior to shipping and have likely been fed non-organic food sources. The Group also believed that bees adapt to a particular environment, and improve their genetics over the years. Continually importing packaged bees does not strengthen the genetic traits of the existing bees, and the majority did not see this as a positive management practice. The Group believed that organic producers should be raising their own replacements. The Group also does not believe that non-organic nucleus colonies should be permitted. However, recognizing that there can be catastrophic loss in colonies, the Group did agree that replacement bees representing up to 25% of hives present in the previous honey flow could be used. (Example: if there were 20 hives the previous honey flow, 5 packages of bees could be utilized to rebuild the colony.) One member of the Group believes that there should not be a limit placed upon the number of packaged bees allowed. In addition to the restriction of 25% replacement, the bees must be transitioned for 60 days prior to honey producing equipment being added to the hives.

This draft document was distributed to ACA members, who in turn distributed this to their clients and others with an interest in beekeeping. Comments were received from beekeepers in various parts of this country, inspectors and researchers experienced with beekeeping. Based on these comments the document was revised from previous drafts.

We recognize that the topics of forage zone and use of replacement bees will continue to be debated, thus this document is left as a draft document. We welcome continued discussion.

## Organic Apiculture Guidance Document

### § 205.2 Definitions.

**Apiary or bee yard.** An area of a collection of hives or colonies of bees kept for their bee products.

**Apiculture.** The management and production of honey bees and queens and their products including but not limited to honey, beeswax, pollen, royal jelly, propolis, and bee venom.

**Bee products.** Honey, wax, propolis, royal jelly and bee venom.

**Colony.** Queen bee with its attendant worker bees and drone bees used to produce bee products.

**Forage zone.** Land or bodies of water, within a 1.8 mile (3 km) radius of the apiary/bee yard which provides bees with water, nectar, honeydew, pollen and propolis.

**Hive.** Equipment used in the production of bee products to include hive boxes, bottom boards, covers, frames, comb.

**Nucleus colony or nuc.** A smaller sized hive box with reduced numbers of bees and brood, usually containing a queen; used for expansion of the apiary operation.

**Replacement bees.** Bees introduced into an existing organic apiary operation to replenish established colonies which have been lost to overwintering, predators or other catastrophic loss.

**Surveillance zone.** Land area of a 2.2 mile radius (3.4 km) beyond the forage zone which may not contain high risk activities.

### § 205.240 Apiculture practice standard.

#### (a) Origin of bees

##### (1) Transition

Bee products from an apiculture operation that are to be sold, labeled, or represented as organic must be from colonies and hives which have been under continuous organic management for no less than one year prior to the removal of the bee products from the hive.

At the beginning of the one year transition, foundation wax must be replaced and all brood comb must be new and produced by bees under organic management.

Foundation may be sourced from:

- (i) Organic foundation
- (ii) Plastic foundation dipped in organic wax
- (iii) Wax foundation, or plastic foundation dipped in either conventional or organic wax.

Once an entire apiary has been converted to organic production, all plastic foundation must be dipped in organic wax. Queen bees are not required to undergo transition.

**(2) Replacement Bees**

The introduction of bees from organic sources or from non-organic sources (i.e. packaged bees), is permitted for replacement purposes *Provided*, That the bees from non-organic sources are limited to 25% of hives present in the previous honey flow, are managed organically for at least 60 days , and honey producing equipment is removed from the hive during the 60 days.

**(3) Expansion of the apiculture operation may be done by**

- (i) Purchase of organic hives and bees
  - (ii) Splitting of existing organic colony to form nucleus colony
  - (iii) Purchase of nonorganic bees, providing that they undergo a one year transition as per requirements in §205.240(a)(1).
- (b) A producer of organic apiculture products must develop an organic apiculture plan in accordance with the provisions in § 205.201. In addition, the organic apiculture plan must:
- (1) Contain a map of the apiary which shows the location of the hives, the forage zone, including the location of organic and wild land, and the surveillance zone, including the location of all non-organic areas;
  - (2) Provide a description of all crops grown, the quantity of organic and/or wild forage to be provided per colony, including the type or types of forage, approximate bloom period, forage density, competing species density, honeybee colony density, colony health, colony strength, topography, and climatic conditions; and any sources of potential contamination located within the 1.8 mile (3 km) forage zone.
  - (3) Provide a description of crops grown and high risk activities such as sanitary landfills, incinerators, sewage treatment facilities, power plants, golf courses, towns or cities, land to which prohibited materials are applied, and all other sources of potential contamination located in the surveillance zone of 2.2 miles (3.4 km) beyond the forage zone. GMO crops, deemed by the accredited certifying agent to be attractive to bees, are not permitted on land within the surveillance zone.
  - (4) Describe the water sources available in the forage zone;
  - (5) For split operations, list and describe the management practices used to prevent commingling and contamination, including measures to prevent commingling resulting from bee drift and robbing.

- (c) A producer of organic apiculture products must maintain records in accordance with § 205.103 and § 205.236(c). Split operations are required to identify hives that have been treated with materials not permitted under §205.603 or materials prohibited under §205.604. Records must include:
- (1) map of the forage zone, the surveillance zone, and the flowering times of the various plants in those zones for all bee yards
  - (2) affidavits verifying the 3 year land management history for the certified forage zones
  - (3) sources of foundation and whether foundation is organic
  - (4) date of last use of prohibited substances
  - (5) identification system for hives and bee yards
  - (6) verification that all comb has been drawn out under organic management
  - (7) the season these “clean” frames had been used for the production of organic honey
  - (8) a system of tracking hives, queens introduced or raised, monitoring through the season
  - (9) a list of inputs used and labels of inputs
  - (10) records of feeding including materials and dates
  - (11) source of any organic sugar, organic honey, organic pollen and/or organic pollen substitutes fed to colonies; certification documentation for materials fed
  - (12) estimated yields of all bee products per hive
  - (13) dates of harvest of bee products
  - (14) sales records of bee products
  - (15) packaging and labeling for bee products sold
- (d) The producer must maintain colonies on land that is managed in accordance with the provisions in § 205.202 through 205.206 or § 205.207.
- (e) The producer must provide bees with organic feed and water by:
- (1) managing the forage zone as certified (for crops or wild harvest) according to provisions of 205.202 through 205.207, or
  - (2) allowing bees from their operation to forage on non-organically managed land when adequate forage from organically managed land and/or land that is managed in accordance with § 205.207, as defined by the operation’s organic apiculture plan, has been provided.
- (f) The producer of an organic apiculture operation may:
- (1) provide supplemental feed from organic honey, organic sugar syrup, and/or pollen substitutes and supplements that are allowed under 205.603, *Except*, That, the producer must not provide organic sugar syrup less than 15 days prior to placement of bee product collection equipment.
- (g) The producer of an organic apiculture operation must not:
- (1) Maintain colonies in an area where a significant risk of contamination by prohibited materials during forage season exists within a 1.8 mile (3 kilometers) radius of the apiary, as described in the operation's organic apiculture plan. Significant risk includes, but is not limited to, use of excluded methods, any herbicides, or pesticides applied to nectar or pollen producing crops.

- (h) Approved hive construction materials include:
- (1) Hives must be made of natural materials, including wood and metal.
  - (2) Outside hive surfaces may be painted with non-lead based paints.
  - (3) Plastic foundation may be used if dipped in organic beeswax
- (i) The producer must establish and maintain preventive health care practices, including:
- (1) Selection of bee stocks, hive densities, and colony locations appropriate to site-specific conditions and resistant to prevalent diseases and pests;
  - (2) Maintenance of adequate supplies of honey and pollen in the hive, including leaving hives with reserves of honey and pollen sufficient for the colony to survive the dormancy period;
  - (3) Use of foundation wax not contaminated with diseases or pests;
  - (4) Destruction of equipment and bees contaminated with disease or pests;
  - (5) Use of management methods or modified equipment to control pests and diseases;
  - (6) Use of therapeutic applications of non-synthetic materials to control pests, parasites, and diseases, *Provided*, That such materials are not prohibited under § 205.604; and
  - (7) Use of therapeutic applications of synthetic materials, *Provided*, That such materials are allowed under § 205.603.
- (j) The producer must not:
- (1) Accept the presence of pests, parasites, or disease without initiating efforts to restore the health of the colony;
  - (2) Use synthetic materials not listed as allowed under § 205.603;
  - (3) Use non-synthetic materials prohibited under § 205.604;
  - (4) Use lumber treated with synthetic materials not listed as allowed under § 205.603 or non-synthetic materials prohibited under § 205.604 for hive construction materials;
  - (5) Use synthetic materials or non-synthetic materials prohibited under § 205.604 in bee smokers;
  - (6) Use synthetic bee repellants to remove bees from their honey;
  - (7) Annually destroy bee colonies following honey flows;
  - (8) Rotate hives between organic and non-organic management; or
  - (9) Sell apiculture products as organic if they contain a residue of a prohibited material greater than 5 percent of the Environmental Protection Agency's tolerance for the specific material, pursuant to § 205.671.

## **Amendments to the National List**

The Working Group discussed materials specific to beekeeping. It is noted that some materials specific to beekeeping will be required to be petitioned for inclusion on the National List.

The Group does not believe that oxytetracycline or terramycin should be approved for use in organic beekeeping. Antibiotics are not permitted for any other type of livestock. Synthetic miticides are also not permitted.

The Group also believes that organic formulations of feed supplements are now available, thus non-organic feed supplements do not need to be added to the National List. This includes vegetable shortening and confectionary sugar. These products are produced organically at this time.

The Group also discussed materials used in the smokers. The Group agreed that synthetic materials in bee smokers are prohibited unless listed on the National List. The Group also recommends that tobacco be added to §205.604, Nonsynthetic substances prohibited for use in organic livestock production.

The following are materials the Working Group believes must be reviewed for appropriate status and petitioned for addition to the National List if necessary.

- Formic acid
- Thymol
- Carbon Dioxide

The Group notes that there are several materials that are not recognized by the EPA for use in bees including Folic acid, Lactic acid and Oxalic acid for mite control. If these materials do receive EPA registration, the Group recommends they be petitioned for inclusion on the National List. Folic acid and Lactic acid should have the following annotations:

- Folic Acid – for varroa mites, after last honey harvest; discontinue 30 days prior to addition of supers

- Lactic acid – after last honey harvest; discontinue 30 days prior to addition of supers. The need must be documented and approved prior to use.