



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

## EC (EU) 834/2007 & 889/2008 Addendum Organic System Plan - Crops

This form is for requesting verification of additional compliance with the EU organic crop production requirements. Applicable fees apply. This verification is dependent on certification to the USDA National Organic Program as a base level of compliance. This form must be submitted with the Farm Organic System Plan and applicable supporting documents. Mark any sections that do not apply as "Not Applicable." Contact MOSA with questions.

### SECTION 1 General Information

Name(s)	When do you anticipate having your product(s) ready for sale?	For Office Use		
		Date Rec'd	Date Farm OSP Rec'd	Initials
<b>Do you understand current regulations and MOSA Program Manual requirements applicable to EU crop production certification?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No (specify):				

### SECTION 2 General Description

The MOSA Program Manual outlines Additional Verification requirements. For the European Union, the basic organic requirements are found in Regulation 834/2007, and Implementing Rules 889/2008 provide additional detail. Review those two documents for complete EU organic standards. Labels used for exported products must be submitted to MOSA for approval. The EU organic regulations require that producers be under the control of a certification agent during the period of conversion/transition to organic production. However, the conversion/transition period may be recognized retroactively if, in a period immediately preceding working with the certification agent, the land parcels were registered in an official environmental protection or similar program (like CRP) that ensures inputs not authorized for organic production were not used on those parcels, or if the parcels were natural or agricultural areas that were not treated with inputs prohibited for organic use. Proof of prior program registration or land use must show that the conditions were met for at least three years.

Have you reviewed current MOSA Program Manual and EU requirements?  Yes  No. Explain:

List any comments or questions from review of these documents:

Review conversion requirements in 834/07 Article 17 and 889/08 Article 36. If your initial application for organic certification was less than 3 years ago, submit program registration documentation or other proof of land use, including start dates.

Are you using any labels for exported products other than labels already approved by MOSA?  No  Yes  
 Submit labels. Review labeling requirements in 834/07 Articles 23-26, and 889/08 Articles 30-35, 57-62, and Annex XI.

Is this a request for EU organic certification for the entire farming operation (all acreage and crops)?  
 Yes (Go to Section 3)  No. Explain:

#### A. Site and Product Information

#### EC 889/08 Article 36(1)

All field identification names/numbers must be consistent with your Farm Organic System Plan, map(s) and Current Year Field Plan. For perennials, the EU organic regulations require no prohibited substance applications for 3 years prior to the first harvest.

Describe all products you expect to sell for export and list field numbers where they are grown

PRODUCT (crop & variety)	FIELD #	PRODUCT (crop & variety)	FIELD #

Do you grow perennial crops for export?  No  Yes. Are they managed organically for three years before the first harvest?  Yes  No. Explain:

**B. Split Production****EC 834/07 Articles 11, 17; EC 889/08 Articles 35, 36, 40 and 73**

*For the purposes of EU compliance verification 'split production' means that only part of the farm operates under the EU organic requirements, while the rest of the operation, as described on the Farm Organic System Plan, uses a production system that is not certified organic. Split production may only occur on a physically, financially, and operationally separate production unit. This goes beyond simple land separation. There is an exception for units that are partly under EU-organic production and partly in conversion to EU-organic production.*

**Do you have any farm areas that do not qualify for EU-organic certification, but are in conversion to EU-organic practices?**

No  Yes. **Identify such areas and describe EU-organic conversion plans/timeframes.**

**Do you keep a separate business name or marketing label for your EU-organic and non-EU-organic crops/products?**  No

Yes. **Explain:**

**Do you maintain clear physical separation of fields, post-harvest handling, and storage for crops produced under different production systems?**  Yes  No. **Explain:**

**List storage units used to store crop(s) for EU export:**

**Do you have separate storage for input materials that are prohibited for EU organic crop production?**

Yes  No. **Explain:**

**Do your input application records clearly distinguish between EU-allowed and EU-prohibited inputs?**

Yes  No. **Explain:**

**Do your records clearly distinguish EU organic harvest and sales from harvest/sales for other production systems?**  Yes

No. **Explain:**

**Are any non-EU-organic areas near your EU-organic production areas?**

No  Yes. **Describe non-organic location(s) and type(s):**

**Have you rotated any farm sites in and out of EU organic production?**  No  Yes. **Explain:**

**C. Parallel Production****EC 834/07 Articles 11 and 22; EC 889/08 Article 40**

*889/08 Article 40 includes what we usually think of as "split production" under the heading parallel production. However, for the purposes of this form, parallel production means growing of visually indistinguishable crops both EU organic and non-EU-organic without clear physical, financial, and operational separation. Parallel production is prohibited for most ANNUAL CROPS requested for EU compliance verification. Exceptions are possible ONLY for PERENNIAL CROPS which require a cultivation period of at least three years, or for production of seed, vegetative propagating material and transplants AND if the following conditions apply: production is undertaken in a way that allows clear and continuous separation of all crops; the parallel production is necessary to ensure that EU-organic production can be initiated or maintained on holdings confronted with climatic, geographical or structural constraints; MOSA is notified of the harvest(s) at least 48 hours in advance; MOSA is informed of the exact harvest quantities and separation measures, upon completion of harvest; and, for perennials, the production is part of a plan for conversion of the whole area to EU-organic in the shortest possible period (not more than 5 years). An exception to the prohibition on parallel production is also possible for grassland used exclusively for grazing*

Is EU compliance verification requested for any parallel production crops?  No (Go to Section 3)  Yes. Explain:

Describe plans to convert the entire farm enterprise to EU-organic production:

Describe plans for notifying MOSA in advance of harvest of the crop products, and for informing MOSA of exact quantities harvested:

### SECTION 3 Seeds

EC 834/07 Article 22(2)(b); EC 889/08 Article 45

*The EU organic regulations require seed and seed potatoes that are EC-certified. However, commercial unavailability exceptions apply, provided that specific criteria are met as outlined in 889/08 Article 45. Use of seed that is not EC-certified organic must be authorized by MOSA prior to sowing of the crop, and details on the type and quantity of seed that's authorized must be provided.*

Were EC-certified organic seeds used?  Yes  No

If EC-certified organic seeds were not used, were EC-in conversion seeds used?  Yes  No  Not applicable

If any seeds used were not EC-certified or EC-in conversion, list their source and explain why they were used:

Not applicable

Was an exemption from the EC-certified seed requirement obtained from MOSA prior to planting?  Yes  No

*If yes, provide documentation clearly showing the type of seed requested, amount used, and area to be planted.*

### SECTION 4 Inputs

EC 834/07 Article 12; EC 889/08 Article 3, Article 5, Annex I and Annex II

*The EU organic regulations require needs of plants to first be addressed by crop rotations and application of manure and organic materials, both preferably composted, and from organic production. When plants' needs cannot be met by such measures, producers may only use fertilizers and soil conditioners listed in Annex I, and plant protection products listed in Annex II, and then only to the extent necessary. Plant protection products that are not of plant, animal, microbial or mineral origin and are not identical to their natural form may not be used in direct contact with the edible portions of the crop. Manure application rates may not exceed 150 pounds of NITROGEN per acre per year. An allowed nitrogen application as a general rule will be up to 2 tons per acre of poultry manure or up to 10 tons per acre of cattle manure. Application rates higher than these must be shown to be allowed through submission of a nitrogen analysis for the manure. Manure from caged poultry or factory farms is prohibited. Micro-organism preparations may be used. All products to be used must be approved by MOSA prior to use.*

#### A. Manure

Do you use raw, composted or processed livestock manure for fertility purposes on the EU-organic fields?

Yes  No (Go to Part B)

List the type of manure and supplier:

List the total amount of manure (in pounds) applied per acre, including that applied directly by livestock through grazing:

If manure from *conventional* livestock is used (whether from on-farm or off-farm), provide a full description of the living conditions and feed sources of the livestock that produced the manure:  Not applicable

