

**GEORGIA CROP IMPROVEMENT ASSOCIATION**  
**ORGANIC CERTIFICATION PROGRAM**  
**Administration and Policy Manual**

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**INTRODUCTION**

The Georgia Crop Improvement Association is an organization of farmers and others who are interested in growing and making available to the public, through certification (known sources of seed, field inspections, analytical testing), high quality seeds and propagating materials of superior varieties so grown and distributed as to insure genetic purity and identity. The Georgia Crop Improvement Association was organized in 1946 and made the legal certifying agency by passage of House Bill #104 in 1956. Senate Bill #583 in July of 1997 superseded this bill. Both bills authorized the Dean of the University of Georgia College of Agriculture and Environmental Sciences to designate the Georgia Crop Improvement Association as the legal certifying agency in Georgia.

Crop Improvement Associations emphasize more efficient crop production by encouraging the use of high quality seed of superior varieties. Larger yields per acre and better quality products have always been essential for the most profitable returns from crop production.

The Georgia Crop Improvement Association's Organic Certification Program (GCIAOCP) is a natural extension of third-party certifying activities regularly performed for seed, Quality Assurance and Identity Preserved Programs currently offered.

The GCIA Organic Certification Program is committed to environmentally sound and economically viable production of food and encourages the preservation of natural resources, the improvement of soil quality and health through organic and sustainable farming practices and to foster the production of healthy livestock and poultry production.

The GCIAOCP is based on the requirements of the June 12, 2007 Part IV, Department of Agriculture and Agricultural Marketing Service 7CFR Part 205 *NATIONAL ORGANIC PROGRAM; FINAL RULE*, also known in this publication as the NOP.

**I. PROGRAM ADMINISTRATION**

Program Administrator

The Executive Director of the Georgia Crop Improvement Association is responsible for the daily operations of the program and for the purpose of this publication will be known as the Program Administrator.

Duties and Responsibilities:

Hear appeals and make recommendations to the GCIA Executive Committee

#### Records:

Assure that records obtained from applicants for certification and certified operations must be maintained for not less than 5 years beyond their receipt.

Assure that records created or received by the GCIAOCP pursuant to the accreditation requirement of the NOP Subpart F, excluding any records covered by §205.510(b)(2) must be maintained for not less than 5 years beyond their creation or receipt.

Assure that records created by GCIAOCP regarding applicants for certification and certified operations must be maintained for not less than 10 years beyond their creation.

#### Review of:

Review and approve any policy and fee changes before submission to the GCIA Board of Directors for action and when applicable forwarding to the NOP.

#### Training:

Conduct a minimum of 2 hours of organic instruction for the GCIAOCP Reviewer to include but not limited to: the Program Manual; relevant areas concerning organic production and handling issues; and review of any USDA NOP updates applicable to organic production and handling issues. Attendance will be documented

Conduct or provide for organic training annually for inspectors. The instruction will include the following:

- The program manual
- Relevant areas concerning organic production and handling
- Review of any USDA NOP updates applicable to organic production and handling issues
- Attendance of training will be documented

#### Investigations:

The Program Administrator will cause investigations of complaints about abuses in the production and sale of GCIAOCP certified crops or products, determine settlement of the complaint and reimbursement for the investigation cost.

The Program Administrator employs inspectors.

#### Evaluations of Program and Personnel:

- The Program Administrator will evaluate inspectors annually.
- The Program Administrator will be evaluated each year by the GCIA Executive Committee.
- The Program Administrator will submit an annual report to the NOP Administrator as required in Section §205.510 of the NOP.

Should a person(s) be identified during an evaluation as needing improvement, the Program Administrator will identify the specific areas(s) the individual needs additional training in and the Program Administrator will design a training program to address the area(s).

Should the GCIA Executive Committee determine that the Program Administrator needs improvement the Executive Committee will task the Program Manager and Certification Reviewer to develop and implement a training program to cover the needed evaluated deficiency(s).

### Certification Reviewer

#### Duties and Responsibilities:

Review completed applications after the on-site organic inspections and be the final approving authority for certification. The Reviewer may approve, deny or place in pending an application based on the NOP.

Reviews will be completed within 30 days of receipt.

Any incomplete, incorrect or unanswered questions on OSP will be addressed to the Organic Certification Specialist for action using the "Incomplete OSP Notification".

When an audit/inspection results in an "identified concern" or "noncompliance", the issue will be addressed to the Program Manager for action and copied to the Organic Certification Specialist.

### Organic Certification Specialist

#### Duties and Responsibilities:

Initial review of OSP/Application for completeness using the certification status review checklist, Daily Standard Operating Procedures and "Procedures for organic application clerical review, application distribution to program manager & reviewer, and final disposition of application".

During the review of each OSP, either initial or renewal, review any websites listed as advertising or promoting organic products by the client for compliance; in particular, ensure correct usage of the organic seal. Note any violations of NOP rules as a noncompliance. NOP 4012 will be utilized in the process.

Send OSP applications to Program Manager. If a renewal, the previous year's audit will be included.

Upon completion of the pre-audit by the Organic Certification Specialist and Program Manager, any incomplete, incorrect or unanswered questions on the OSP will be addressed by sending the "Incomplete OSP Notification" to the applicant. All such notifications should be recorded by the Organic Certification Specialist.

Staff requests for documents, labels, protocols, OSP updates, etc. must be provided by a specified deadline. Failure to do so may result in a notice of noncompliance.

Client to amend the original OSP to reflect any corrections to application per a submitted "Incomplete OSP Notification" prior to submitting to Inspector/Auditor.

When an audit/inspection results in an "identified concern" or "noncompliance", the Organic Certification Specialist (at the direction of the program manager) will issue an appropriate notification to all parties and document any corrective actions to the OSP and enter into spreadsheet.

Upon completion of audits, client will be provided a copy of the completed audits along with any test results, to include but not limited to onsite, unannounced, and/or required sampling audits.

### Program Manager

Duties and Responsibilities:

Assign audits / inspections using criteria found in SOP "Assigning Audits to Inspectors".

Any incomplete, incorrect or unanswered questions on OSP will be addressed to the Organic Certification Specialist for action.

When an audit/inspection results in an "identified concern" or noncompliance," the Program Manager will address the issue with the applicant and copy the Organic Certification Specialist.

Review unannounced audits per the "Unannounced Inspection Report" and report findings to the client receiving the audit.

Per Appendix B (Policy and Procedures for Conducting Unannounced Inspections or Certified Organic Operations) of the GCIAOCP Administrative and Policy Manual, determine the number of clients to receive unannounced inspections.

Communicate with Senior Inspector the number of unannounced inspections and pesticide residue tests needed to be in compliance with NOP requirement of 5%.

Submit any revisions to the fee schedule to NOP for approval prior to implementation.

### Senior Inspector & Certification Reviewer

Duties and Responsibilities:

Perform assigned audits per Inspector Duties.

The organic system plan will be reviewed for compliance by the inspector prior to inspection and auditing. The inspector will contact the client regarding compliance issues prior to scheduling the audit.

Perform assigned certification decision reviews per Policy Manual Certification Reviewer Duties and Responsibilities.

Provide support and training to GCIAOCP inspectors and staff as needed.

Schedule and supervise required Shadow and Witness Audits and report completion of and supporting documents to the Program Manager and Program Administrator.

Conduct and/or assign unannounced inspections and pesticide residue sampling necessary to be in compliance with NOP requirement of 5%.

## Inspector

Qualifications and responsibilities:

Inspectors must not have a conflict of interest with parties they are inspecting and they are bound to maintain confidentiality regarding information on the application and information obtained as part of the inspection process. Inspectors will refer to NOP 205.501(A)10 & 11. Inspectors must not act as consultant or endorse items or products. Inspectors must have completed an IOIA basic training program.

After an inspector completes the International Organic Inspectors Association (IOIA) basic training course, he/she will shadow a recognized, experienced inspector (assigned by the Program Administrator) on two audits, and an appointed inspector will witness at least two audits performed by the new inspector.

Upon completion of the two shadow audits and two witness audits, the assigned inspector, Program Administrator and Program Manager will review the witness audit reports completed by the new inspector. Upon such review, the Program Administrator may recognize the new inspector as proficient or develop and implement a training program to correct any noted deficiencies. Upon completion of said program, the Program Administrator will reevaluate the inspector.

Duties:

The organic system plan will be reviewed for compliance by the inspector prior to inspection and auditing. The inspector will contact the client regarding compliance issues prior to scheduling the audit.

Perform assigned audits and complete required inspection reporting, etc.

## **II. APPLICATION FOR CERTIFICATION AND INSPECTION**

Any producer, handler, processor, distributor of Organic Product may apply for certification. Application is made by submitting a completed form with the appropriate fee. Certification is an annual process. Every certified farm, handler, processor, or distributor must annually renew certification by updating field/facility histories, affidavits, processing facility changes, etc. and have a new certification compliance inspection. The application due date is the anniversary of the original application. Acceptance of an application is defined as: payment is received with a completed Organic System Plan (OSP), a preaudit review is completed, and the Organic Certification Specialist has forwarded the OSP to the Program Manager.

Upon request, the GCIAOCP Administrator / Manager / Organic Certification Specialist will make available the GCIAOCP Administration and Policy Manual including:

Introduction

Program Administration

Appeals Process

Inspector Requirements

Application Procedures

Fees

Noncompliance, Warning and Pending Procedures

Liability Statement

Confidentiality Statement

Conflict of Interest Statement

GCIAOCP Application Flow Chart

Organic System Plan (OSP) and all supporting documentation

The applicant must provide a knowledgeable authorized representative of the operation to be present with the inspector to answer questions, sign appropriate papers, and be present at the exit interview.

The organic system plan will be reviewed for compliance by the inspector prior to inspection and auditing. The applicant will be notified (email, documented phone call, UPS and/or USPS) within 45 days of an inspection schedule, problems with the original application, noncompliance, fee estimate, etc. The implementation and documentation of the plan will be one of the areas the inspector will be reviewing.

The GCIAOCP Organic Certification Specialist will provide the inspector with:

- the appropriate audit forms
- previous onsite inspections
- copies of all approved labels

For correctable noncompliance actions, failure to submit an annual organic system plan and/or certification fees for example, will be addressed with a Notice of Noncompliance and/or a Letters of Proposed Suspension.

The inspector may take samples of water, soil, plant tissue, plants, etc. for testing. A receipt will be given to the producer; the producer will not charge the GCIAOCP for the sample taken. The cost of testing will be paid by the GCIAOCP, and the applicant will receive a copy of the analysis by email. ***(See Appendix A: GCIAOCP Procedures for Sampling and Residue Testing.)***

All inspections will be made when organic production, handling, processing activities best represent compliance or noncompliance with the standards and NOP.

Inspectors will conduct an exit interview with the applicant or authorized representative upon completion of the inspection process. Should the facility market more product than received, this discrepancy will be reported to the Program Administrator immediately. The Program Administrator will report the discrepancy to the National Organic Program contact within two working days. The Inspector will document on the exit interview the quantity of organic product received and the quantity shipped. The inspector will cover all potential problem areas noted on the inspection form.

The GCIAOCP Staff will email the GCIAOCP Certification Reviewer within 15 business days of receiving the completed inspection report and will notify the applicant within 15 business days of the Certification Reviewer's decision. The GCIAOCP Staff will supply, via email, the Inspector(s) a copy of the Certification Reviewer's Decision Checklist Document.

Upon review of the Inspector's report, the Certification Reviewer will grant organic certification to the Applicant, grant organic certification to the Applicant with areas of concern, issue Notice of Noncompliance, issue Notice of Noncompliance with Notice of Proposed Suspension or deny organic certification. If Applicant is issued a Notice of Noncompliance, Notice of Noncompliance with Notice of Proposed Suspension or denied organic certification. The Program Administrator will have 15 days to notify the Applicant. Section §205.405 of the NOP protocol will be followed. The Administrator of the NOP will be notified simultaneously with the issuance of any Notice of Denial of Certification issued pursuant to Section §205.405 of the NOP, Notification of Noncompliance, Notification of Noncompliance correction, Notification of Proposed Suspension or Revocation, and Notification of Suspension or Revocation sent pursuant to Section §205.662 of the NOP. If the Applicant is granted certification, a certificate will be issued. The certificate will comply with Section §205.404 of the NOP.

The GCIAOCP will accept the certification decisions made by another certifying agent accredited or accepted by the USDA pursuant to Section §205.500 of the NOP.

Participation in this Program will not be denied to any person due to discrimination because of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, or marital or family status.

An application is considered a legal document. Signing of the application attests to the truthfulness of the historical information presented, the desire to carry out the organic farm plan, permission to inspect the applicant's operation and records and to notify the inspector of any unusual hazards to his personal safety. Only complete applications will be accepted.

Consultants:

The GCIAOCP understands the need for consultants. The process of submitting an Organic System Plan (OSP) and subsequent onsite inspection is designed to determine if the person responsible for the implementation and daily management of the OSP has adequate knowledge of and understands NOP rules, regulations, etc. to effectively manage the OSP as submitted. GCIAOCP will not communicate directly with consultants on issues specific to an OSP. GCIAOCP staff will communicate with consultants to answer non client specific questions.

### **III. FEES (filed with NOP on 8/18/23)**

#### **Organic Crop Operation (Grower/Producer)**

- \$975.00 Initial Administration Fee with farms in excess of 20 acres add \$7.00 per acre
- \$925.00 Annual Renewal Administration Fee with farms in excess of 20 acres add \$7.00 per acre
- Assessments calculations:  
Assessment of 0.5% (one-half of one percent) of gross organic sales  
2023 Minimum assessment \$100.00. 2024 Minimum assessment \$300.00. Maximum \$20,000.00.
- \$100.00 Surcharge\*

#### **Organic Greenhouse, Hydroponic, Aquaponic Operations**

- \$875.00 Initial Administration Fee
- \$825.00 Annual Renewal Administration
- Assessments calculations:  
Assessment of 0.5% (one-half of one percent) of gross organic sales  
2023 Minimum assessment \$100.00. 2024 Minimum assessment \$300.00. Maximum \$20,000.00.
- \$100.00 Surcharge\*

#### **Organic Livestock/Forage Operation**

**Please note: we no longer certify ruminant animal operations.**

- \$975.00 Initial Administration Fee with farms in excess of 500 acres add \$2.00 per acre
- \$925.00 Annual Renewal Administration Fee with farms in excess of 500 acres add \$2.00 per acre
- Assessments calculations:  
Assessment of 0.5% (one-half of one percent) of gross organic sales  
2023 Minimum assessment \$100.00. 2024 Minimum assessment \$300.00. Maximum \$20,000.00.
- \$100.00 Surcharge\*

#### **Organic Processor/Handler Operation**

- \$875.00 Initial Administration Fee
- \$825.00 Annual Renewal Administration Fee



- Assessment calculations:  
0.5% (one-half of one percent) of gross organic sales minus cost of raw certified organic product  
2023 Minimum assessment \$200. 2024 Minimum assessment \$400. Maximum \$20,000.00.
- Operations that do not purchase or sell product will be assessed on fees paid for receiving, storing, shipping, etc.
- \$100.00 Surcharge\*

**Label fees for initial applications, renewals and new products:** Operations submitting more than 10 products/labels with initial application or renewal, there is a review fee of \$10.00 per product/label. New product or labels submitted for review apart from renewal application incur a \$50.00 fee for each product.

**Sales assessments are due from every certified operation, including operations with the same owner (Crops/Processor-Handler).**

- The Crops operation will submit the value of their organic product for assessment.
- The Processor/Handler may deduct the Crops operation organic sales value submitted from their gross organic sales, and be assessed on the net organic sales

\* Georgia Crop Improvement Association's surcharge will be \$100.00 for each application, initial and renewals, to cover: (1) The NOP requires that 5% of all clients be tested for residue compliance. (2) The NOP requires that 5% of all clients receive an unannounced inspection. (3) The NOP requires that GCIAOCP be audited by the USDA/AMS every 30 months for compliance to NOP Rules and Regulations.

An estimate of fees charged will be provided to each applicant prior to inspection.

Renewal applications are due in the GCIA office on the anniversary date of the initial inspection.

### **OTHER CHARGES**

**Re-inspections:** Re-inspections will be charged at the rate of \$50.00 per hour

**Travel:** Mileage will be charged to the applicant at the prevailing IRS rate when application is made. All other travel expenses such as lodging, meals and/or airfare will be charged to the applicant if incurred.

**Transaction Certificates (For Export):** \$100.00 per certificate

**Certification Fee Refund Policy:** Certification fees are non-refundable except in the following instance – The withdrawal of initial application prior to the onsite inspection. A processing fee of \$50.00 will be retained by GCIAOCP. Refunds will be made after application has been withdrawn.

**Interest of 1.5% per month will be charged on all past due accounts. A Notice of Noncompliance will be sent to the USDA National Organic Program for failure to pay renewal fees or sales assessment within 30 days of invoice.**

**THE GCIAOCP RESERVES THE RIGHT TO AUDIT SALES RECORDS ON ALL MENTIONED CATEGORIES.**

## **IV. NONCOMPLIANCE, WARNINGS, PENDING AND INVESTIGATIONS**

Noncompliance with the GCIAOCP may result in the loss of certification.

The GCIAOCP Administrator/Manager may investigate complaints of noncompliance with the act or regulations of this part concerning production and handling operations certified as organic. The GCIAOCP Administrator/Manager will notify the NOP and the GCIAOCP Certification Reviewer of all compliance proceedings and actions taken.

In addition, the NOP will be notified of any fraud, willful violations and the loss of certification.

The GCIAOCP will use mediation as a means for dispute resolution. Section §205.663 of the NOP will be the guide for all mediations, if accepted by the GCIAOCP. The client requesting mediation will pay all expenses incurred by the GCIAOCP.

## **V. INSPECTION AND TESTING, REPORTING, AND EXCLUSION FROM SALE**

All agricultural products that are to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must be made accessible by certified organic production or handling operations for examination by the GCIAOCP, the NOP and the State of Georgia’s Organic Program official.

One or all of the above may require preharvest or postharvest testing of any agricultural input used or agricultural products to be sold, labeled, or represented as “100 percent organic”, “organic”, or “made with organic” (specified ingredients or food group(s)) when there is reason to believe that the agricultural input or product has come in contact with a prohibited substance or has been produced using excluded methods or any reason as listed in Appendix A. Such tests must be conducted by the applicable State organic program’s governing State official or the certifying agent at the official’s or certifying agent’s own expense.

***(See Appendix A for GCIAOCP procedures to be used for sampling and residue testing.)***

Preharvest or postharvest tissue sample collection must be performed by an inspector representing the NOP, applicable State organic program governing State officials, or the GCIAOCP. Sample integrity must be maintained throughout the chain of custody, and residue testing must be performed in an accredited laboratory. Chemical analysis must be made in accordance with the methods described in the most recent edition of the Official Method of Analysis of the AOAC International or other current applicable validated methodology determining the presence of contaminants in agricultural products.

The results of all analyses and tests performed must be promptly provided to the NOP; Except, That, where a State Organic Program exists, all test results and analyses shall be provided to the State Organic Program’s governing State official by the applicable certifying party that requested testing; and will be available for public access, unless the testing is part of an ongoing compliance investigation.

If test results indicate a specific agricultural product contains pesticide residues or environmental contaminants that exceed the Food and Drug Administration’s or the Environmental Protection Agency’s regulatory tolerances, the certifying agent must promptly report such data to the

Federal Health Agency whose regulatory tolerance or action level has been exceeded.

When residue testing detects prohibited substances at levels that are greater than 5% of the Environmental Protection Agency's tolerance for the specific residue detected or unavoidable residual environmental contamination, the agricultural product must not be sold, labeled, or represented as organically produced. The NOP, the applicable State Organic Program's State Official, or the GCIAOCP may conduct an investigation of the certified operation to determine the cause of the prohibited substance.

When a prohibited substance is applied to a certified operation due to a Federal or State emergency pest or disease treatment program and the certified operation meets the requirements for certification, the certification status of the operation shall not be affected as a result of the prohibited substance: provided, that:

- (a) Any harvested crop or plant part to be harvested that has contact with a prohibited substance applied is the result of a Federal or State emergency pest or disease treatment program cannot be sold, labeled, or represented as organically produced; and
- (b) Any livestock that are treated with a prohibited substance applied as the result of a Federal or State emergency pest or disease treatment program or product derived from such treated livestock cannot be sold, labeled, or represented as organically produced; Except, that:
  - (1) Milk or milk products may be sold, labeled, or represented as organically produced beginning 12 months following the last date that the dairy animal was treated with the prohibited substance; and
  - (2) The offspring of gestating mammalian breeder stock treated with a prohibited substance may be considered organic: provided, that, the breeder stock was not in the last third of gestation on the date that the breeder stock was treated with the prohibited substance.

## **VI. LIABILITY**

No GCIAOCP Staff Member, Inspector, Certification Reviewer, GCIA Board of Directors, may be held liable or responsible for any amount in excess of the administrative fees paid. Any monetary claim arising out of or relating to the administration of the program will be settled by arbitration. The GCIA Executive Committee will choose a representative, the person making the claim will choose a representative, and the two representatives will choose a third party for arbitration. The decision will be final. Signing of the Organic Application by the producer, handler, and/or processor is in agreement with the above.

The GCIAOCP will hold the Secretary of Agriculture harmless of any failure on the part of the certifying agent to carry out provisions of the NOP act.

## **VII. CONFIDENTIALITY**

### **Documentation Requests:**

All GCIAOCP Staff, Contractors, Inspectors, Certification Reviewer and the GCIA Board of Directors must adhere to the principals of confidentiality. Pursuant to 7 C.F.R. Section §205.501(a)(10), GCIAOCP will, "Maintain strict confidentiality with respect to its clients under

the applicable organic certification program and not disclose to third parties (with the exception of the Secretary or the applicable State organic program's governing State official or their authorized representatives) any business-related information concerning any client obtained while implementing the regulations in this part, except as provided for in §205.504(b)(5)."

Pursuant to 7 C.F.R. Section §205.504(b)(5) the following information may be made available to any member of the public:

- Certification certificates issued to operations during the current and three preceding calendar years.
- A list of producers and handlers whose operations GCIACOP certified, including the name of the operation, type(s) of operation, products produced, and the effective date of the certification, during the current and three preceding calendar years.
- The results of laboratory analyses for residues of pesticides and other prohibited substances conducted during the current and three preceding calendar years.
- Other business information as permitted in writing by the producer or handler.

Any requests for the above listed information must be submitted in writing and the following fees will apply:

- \$50.00 per hour research time
- \$0.12 per copy
- All applicable postage fees

## **VII. CONFLICT OF INTEREST**

Conflict of interest is defined as having an economic interest with a farm or processor under review for certification one year prior to, during or one year after work or employment was concluded. GCIACOP Staff, Contractors, Inspectors, Certification Reviewer and the GCIACOP Board of Directors with a conflict of interest must make the conflict known and not participate in discussion or decisions regarding the farm or processor under review.

The GCIACOP Staff, Contractors, Inspectors, Certification Reviewer and the GCIACOP Board of Directors must sign a conflict of interest statement annually.

Should a conflict of interest be found, corrective action outlined in Section §205.501, (12) (i) of the NOP will be followed.

GCIACOP staff, contractors and inspectors will refrain from making false or misleading claims about other agencies' accreditation status, the USDA accreditation program for certifying agents, or the nature or quality of products labeled as organic.

Consulting is expressly prohibited.

# APPENDIX A

## GCIAOCP Procedures for Sampling and Residue Testing

### Purpose and Intent:

To establish program procedures and develop a system to conduct periodic residue testing for at least 5% of our certified operations where agricultural products are sold or labeled as organically produced as outlined by USDA NOP regulation.

To satisfy the requirement of USDA NOP § 205.670(d); inspection and testing of agricultural product to be sold, labeled, or represented as “100% organic”, “organic”, or “made with organic (specified ingredients or food group(s))” and NOP § 205.504(b)(5)(iii).

Refer to NOP 2610 Guidance Document “Instructions – Sampling Procedures for Residue Testing”

The sampling of many agricultural products (soybeans, corn, grain, etc.) may require the use of special equipment. Bulk / volume sampling may be hazardous. For many bulk items, GCIAOCP may utilize the services of D.R. Schaal Agency Inc., Federal Licensed Grain Inspectors (912-348-3952).

### Procedures:

#### WHEN TO COLLECT SAMPLES

- When it is suspected that a prohibited substance has been applied.
- When it is suspected that contamination from genetically modified organisms, antibiotics, or prohibited substances may have occurred.
- When pesticide drift may have occurred.
- To gather evidence as part of an investigation.
- As part of a surveillance sampling program.
- Random selection of an operation.
- Testing operations that have a high volume of organic products.

#### SAMPLE SELECTION CRITERIA

GCIAOCP will collect a sample of a given organic agricultural product, selected from a single location in a field, bin, or pallet. A single sample analyzed for residues using sensitive test procedures should provide enough information to determine if residues are present. A sample of a crop could consist of the raw agricultural commodity (RAC) or processed commodity from the RAC (EPA Residue Chemistry Guidelines, Table 1). Samples may also include the collection and testing of soil, water, waste, seeds, or plant tissue, if appropriate. GCIAOCP may choose to select samples which attempt to detect contamination where it is most likely to occur due to risk factors present at a given operation or a location within an operation.

An official sampling procedure both for the field inspection and sample collection should be followed. When collecting samples for pesticide residue testing the inspector should consider adjacent field use and potential contaminating sources. The volume of the sample will be determined by the inspector, but in all cases the total volume must be enough for laboratory analysis. The frequency of the sample will be determined using the following:

A five acre or less field requires five samples to be taken and one additional sample for each

succeeding five acres.

For example:

< 5 acres = 5 samples

5 -10 acres = 6 samples

11 -15 acres = 7 samples

16 - 20 acres = 8 samples

21 - 26 acres = 9 samples

26 - 30 acres = 10 samples

No more than 20 samples per field are required if field is uniform. The sites for visual evaluation should be selected based on a specific travel pattern across the field to ensure a representative sample is collected.

**SAMPLE AMOUNTS**

GCIAOCP will obtain a sufficient sample to ensure the laboratories will have adequate amounts for processing and reanalysis if necessary (Table 1). The amounts shown are consistent with those instituted as part of the standard operating procedures (SOPs) for the USDA Agricultural Marketing Service (AMS) Pesticide Data Program. If collecting from multiple containers is needed to obtain the suggested amounts, GCIAOCP will confirm that the products being sampled are from the same lot.

**Table 1: Suggested Sample Amounts by Commodity Type**

Commodity Type	Recommended Sample Amount
Most fresh fruit and vegetables	3-5 pounds (approximately 1.5-2.5 kg); A single large melon or squash exceeding 5 pounds (approximately 2.5 kg) is acceptable.
Blended commodities or those smaller than a strawberry	1 pound (approximately 500 g)
<i>Berries</i>	
<i>Cherries</i>	
<i>Coffee beans</i>	
<i>Dried Commodities</i>	
<i>Flours</i>	
<i>Grains</i>	
<i>Herbs</i>	
<i>Garlic</i>	
<i>Legumes</i>	
<i>Mushrooms (small)</i>	
<i>Nuts</i>	
<i>Teas</i>	
<i>Seeds</i>	
<i>Small jars/packages (i.e. baby food sized)</i>	
<i>Spices</i>	
All liquids and semisolid foods (e.g. juices, oils)	16-32 ounces

Canned/jarred foods	(approximately 500 mL to 1000 mL)
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Adapted from USDA AMS Pesticide Data Program SOPs and U.S. EPA Residue Chemistry Guidance.

For raw commodities, the portion which should be sampled is generally the whole commodity. Adhering soil, decomposed outer leaves, and inedible root and tuber vegetable tops should be excluded from the sample. In addition to the U.S. EPA Residue Chemistry Guidance, Codex has guidance on which portion of the commodity should be sampled and provides recommended sample preparation methods for the determination of residues.

#### **Collection Sites:**

Products will be obtained at farm gate level if growing season permits (i.e. field samples). If unable to collect at farm gate level due to growing season, sampling at other locations will be permitted (e.g. storage facility, warehouse, handler, etc.).

#### **Sample Collection & Shipping**

Sample collection and shipping methods utilized will be based on the USDA Pesticide Data Program sample collection requirements as provided by the *USDA NOP 2610*. Samples will be shipped the approved laboratory for analysis the same day collected or no later than the next day after collection. When possible, schedule collections to avoid weekend shipping delays.

#### **Sample Handling and Shipping to USDA Lab**

Sample handling and shipping methods utilized will be based on the USDA Pesticide Data Program sample collection requirements as provided by the *USDA NOP 2610*.

#### **Sample Collection Information:**

Sample information and description will accompany the sample to the lab.

A Residue Sampling Form will be utilized by GCAIOCP as provided by the *USDA NOP 2610*.

The Residue Sampling Form contains; Sample ID Number, commodity information, collection site information, shipping information, and sample receipt in lab confirmation.

#### **Sample Analysis for Pesticide Residues:**

A Residue Sampling Form will be used when testing samples.

Samples will be shipped to the National Science Laboratory in Gastonia, North Carolina.

The USDA lab will test commodities for pesticide residues under the Pesticide Data Program (PDP). NOP samples will be analyzed “as received” as per USDA NOP.

#### **Responding to Results from Pesticide Residue Testing**

##### **Procedure:**

##### **No Detected Residues:**

- Notify the certified operation of the test results and indicate that the product may be sold as organic.
- Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

##### **Residues Detected at Less than 0.01 ppm**

If tests detect residues of prohibited pesticides as less than 0.01 parts per million (ppm), which is the same as 10 parts per billion (ppb):

- Notify the certified operation of the test results and indicate that the product may be sold as organic.
- Assess why the residue is present and follow up with operation as appropriate.
- Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

### **Residues Detected at or above 0.01 ppm**

If a test detects a residue of a prohibited pesticide at or above 0.01 ppm, GCIAOCP will first determine if U.S. Environmental Protection Agency (EPA) has established a tolerance for the pesticide for the tested commodity (e.g., residues of imidacloprid in or on soybeans). Additional information on using EPA tolerances is provided below in “**EPA Tolerances**”.

Once GCIAOCP has identified whether EPA has established a tolerance for a given residue in the tested sample, GCIAOCP will use the following guidelines as outlined below to determine which reporting and adverse actions are appropriate.

### **EPA Tolerance is Established**

If the EPA has established a tolerance for the detected pesticide in the tested sample, follow the appropriate instructions below based on the level detected.

#### **A. If residue is detected at or below 5% of the EPA tolerance, GCIAOCP will:**

1. Notify the certified operation of the test results.
2. Assess why the residue is present.
3. If appropriate, consider a notice of noncompliance for the following violations:
  - a. *§205.202(b)*: application of prohibited substances. The notice will inform the operation that the product is not organic. At that time, GCIAOCP will have to consider suspending or revoking the operation’s certification.
  - b. *§205.202(c)*: inadequate buffer zones to prevent the unintended application of prohibited substances. The notice will require corrective actions to prevent future contamination.
  - c. *§205.272*: inadequate measures to prevent commingling or contamination of organic products. The notice will require corrective actions to prevent future contamination.
4. If residues are not a result of the application of prohibited pesticides, the product may be sold as organic.
5. If suspensions, revocations, or civil penalties are appropriate, coordinate adverse actions with the NOP.
6. Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

#### **B. If residue is detected above 5% of the EPA tolerance level, but not above the EPA tolerance level, GCIAOCP will:**

1. *Immediately* notify the certified operation of the test results and indicate that the product may not be sold as organic.
2. Assess why the residue is present.
3. Issue a notice of noncompliance for violation of 7 CFR 205.671, having prohibited substances at levels greater than 5% of the EPA tolerance level. Additional violations



may include:

- a. *§205.202(b)*: application of prohibited substances. The notice will propose to suspend or revoke the operation's certification.
  - b. *§205.202(c)*: inadequate buffer zones to prevent the unintended application of prohibited substances. The notice will require corrective actions to prevent future contamination.
  - c. *§205.272*: inadequate measures to prevent commingling or contamination of organic products. The notice will require corrective actions to prevent future contamination.
4. If suspensions, revocations, or civil penalties are appropriate, coordinate adverse actions with the NOP.
  5. Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

**C. If residue is detected above EPA tolerance level, GCIAOCP will:**

1. *Immediately* notify the certified operation of the test results and indicate that the product may not be sold as organic.
2. *Immediately* report the violation to the appropriate agency.
3. Assess why the residue is present.
4. Issue a notice of noncompliance for violation of 7 CFR 205.671, having prohibited substances at levels greater than 5% of the EPA tolerance level. Additional violations may include:
  - a. *§205.202(b)*: application of prohibited substances. The notice will propose to suspend or revoke the operation's certification.
  - b. *§205.202(c)*: inadequate buffer zones to prevent the unintended application of prohibited substances. The notice will require corrective actions to prevent future contamination.
  - c. *§205.272*: inadequate measures to prevent commingling or contamination of organic products. The notice will require corrective actions to prevent future contamination.
5. If suspensions, revocations, or civil penalties are appropriate, coordinate adverse actions with the NOP.
6. Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

**No EPA Tolerance, but FDA Action Level Exists**

If there is not an established EPA tolerance, GCIAOCP will check for a U.S. Food and Drug Administration (FDA) action level. FDA action levels are established for persistent pesticides, such as chlorinated hydrocarbons (e.g., DDT), that are no longer registered by EPA for use in crop or animal production, but continue to be detected in crops due to the persistent nature of these chemicals in the environment.

**A. If residue is detected below the FDA action level, GCIACOP will:**

1. Notify the certified operation of the test results.
2. Assess why the residue is present.
3. If appropriate, consider a notice of noncompliance for the following violations:
  - a. *§205.202(b)*: application of prohibited substances. The notice will notify the

operation that product is not organic and results will be reported as described below. GCIAOCP may decide to suspend or revoke the operation's certification.

- b. *§205.202(c)*: inadequate buffer zones to prevent the unintended application of prohibited substances. The notice will require corrective actions to prevent future contamination.
  - c. *§205.272*: inadequate measures to prevent commingling or contamination of organic products. The notice will require corrective actions to prevent future contamination.
4. If residues are not a result of the intentional or direct application of prohibited pesticides, the product may be sold as organic.
  5. If suspensions, revocations, or civil penalties are appropriate, coordinate adverse actions with the NOP.
  6. Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

**B. If residue is detected above the FDA action level, GCIAOCP will:**

1. *Immediately* notify the certified operation of the test results and that the product may not be sold as organic. The FDA or a foreign equivalent may provide guidance on addressing these products.
2. *Immediately* report the violation to the appropriate agency as described below in **"Reporting Violations"**.
3. Assess why the residue is present.
4. If appropriate, consider a notice of noncompliance for the following violations:
  - a. *§205.202(b)*: application of prohibited substances. The notice will propose to suspend or revoke the operation's certification.
  - b. *§205.202(c)*: inadequate buffer zones to prevent the unintended application of prohibited substances. The notice will require corrective actions to prevent future contamination.
  - c. *§205.272*: inadequate measures to prevent commingling or contamination of organic products. The notice will require corrective actions to prevent future contamination.
5. If suspensions, revocations, or civil penalties are appropriate, coordinate adverse actions with the NOP.
6. Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

**No EPA Tolerance of FDA Action Level**

Some testing results will indicate pesticide residues for which EPA has not established a tolerance and the FDA has not established an action level.

**A. If testing detects a residue of prohibited pesticides above 0.01 parts per million (ppm), GCIAOCP will:**

1. *Immediately* notify the certified operation of the test results and indicate that the product may not be sold as organic.
2. *Immediately* report the violation to the appropriate agency as described below.

3. If appropriate, the following violations will be considered for a notice of noncompliance:
  - a. *§205.202(b)*: application of prohibited substances. The notice will propose to suspend or revoke the operation's certification.
  - b. *§205.202(c)*: inadequate buffer zones to prevent the unintended application of prohibited substances. The notice will require corrective actions to prevent future contamination.
  - c. *§205.272*: inadequate measures to prevent commingling or contamination of organic products. The notice will require corrective actions to prevent future contamination.
4. If suspensions, revocations, or civil penalties are appropriate, coordinate adverse actions with the NOP.
5. Retain the test results, which must be made available to the public upon request and will be reviewed as part of the next audit.

## Reporting Violations

In addition to the compliance and enforcement actions described above, GCIAOCP is responsible for reporting violations of EPA and/or FDA regulations to the proper authority. Violations include application of a pesticide which is prohibited by EPA (such as a pesticide without an EPA tolerance) or an allowed pesticide at levels exceeding regulatory tolerances. Depending on the operation's location and the results of GCIAOCP's assessment, the appropriate authority may include the EPA, FDA, or State food safety program.

### A. Operations within the United States:

**If the violation can be traced back to an application to a field**, submit the violation, including its location and time, to the EPA by visiting <http://www.epa.gov/tips>. Reporting to EPA is indicated if:

1. The detected pesticide doesn't have an EPA tolerance established for the tested sample (meaning EPA doesn't permit that pesticide to be applied to organic or nonorganic varieties of the crop).
2. The detected pesticide has an EPA established tolerance for the tested sample, but too much of the pesticide was applied (i.e., exceeding labeled application rates).

**If the violation can't be traced to a direct, intentional application to a field** or it is detected in the stream of commerce, submit the violation to the closest FDA district office: <http://bit.ly/fda-office>

## EPA Tolerances

### A. About EPA Tolerances

After reviewing field study data, EPA established tolerances, or maximum residues, for each allowed pesticide. EPA tolerances generally exist for specific commodities within the following categories:

- Crops (e.g., grapes)
- Feedstuff derived from crops (e.g., hay)
- Certain processed commodities (e.g., raisins)

- Certain products derived from livestock (e.g., milk).

EPA has residue chemistry test guidelines that identify which form of the raw or processed product should be tested. For example, when testing sweet corn, laboratories should remove the husk and analyze the kernels and cob. For almonds, analysis should include both the almond nutmeat and hulls, while the hulls are removed on other nuts.

EPA tolerances are published in the Code of Federal Regulations (40 CFR part 180), which is also referenced below.

## B. Using EPA Tolerances

In most cases, laboratories should prepare samples according to the residue chemistry test guidelines so that the data can be compared to EPA tolerances. Deviations from the standard sample preparations may be used at the discretion of GCIAOCP. For example, if GCIAOCP collects a field sample in response to a complaint that a certified operation has applied a prohibited substance, the inedible portion of the crop may be left intact for testing.

Unless field testing demonstrates that the residues increase in the final product, EPA doesn't establish tolerances for processed products. Unless a specific tolerance exists for the processed product, certifying agents should use the tolerance for the raw commodity.

For some pesticides, the EPA established tolerances that include the active ingredient and its breakdown products (metabolites). While not standard practice for every pesticide, if laboratories analyze metabolites, the residues of the active ingredient and its metabolites should be combined to determine the total pesticide residue.

The following data area an example of detected aldicarb residue and its metabolites in a sample of sugar beet tops:

- 0.90 ppm      *Aldicarb (2-methyl-2-(methylthio)propionaldehyde O – (methylcarbamoyl) oxime)*
- 0.1 ppm      *Aldicarb sulfoxide (2-methyl 2-(methylsulfinyl) propionaldehyde O-(methylcarbamoyl) oxime)*
- 0.07 ppm      *Aldicarb sulfone (2-methyl-2-(methylsulfonyl) propionaldehyde O-(methylcarbamoyl) oxime)*

According to the tolerance established at 40 CFR 180.269 for aldicarb, these residues should be combined to determine the total residue for the sample. Since the total combined residue is 1.7 ppm, this sample exceeds the 1 ppm tolerance for aldicarb in sugar beet tops and the violation should be reported as described in **“Reporting Violations”**. This sample is also in violation of the USDA organic regulations and certifying agents should follow the steps outlined in **“EPA Tolerance is Established”**.

# APPENDIX B

## GCIA ORGANIC CERTIFICATION PROGRAM

### Policy and Procedure for Conducting Unannounced Inspections of Certified Organic Operations

#### Policy

Unannounced inspections are one of the most effective and useful tools in the USDA organic regulations to ensure compliance across certified operations, and give consumers additional reasons to trust the organic label. Unannounced inspections serve the dual purpose of giving the certifying agent the opportunity to observe the activities of a specific operation without the advance notice, as provided in the annual monitoring inspections, and acting as a deterrent to other operations who may consider violating USDA regulations.

In light of these benefits, GCIAOCP will conduct unannounced inspections of 5% of their total certified operations per year as a tool in ensuring compliance with the regulations. GCIAOCP will strive to conduct unannounced inspections broadly across all certified operations, including a broad spectrum of production types and products including all geographic locations and certification scopes.

In October of each year, the program manager will determine the number of clients audited and to be audited within the current year. Using NOP 2609 guidelines, the program manager will determine the number of clients to receive unannounced inspections. Should additional clients be added after October, the number of unannounced audits will be revised.

#### Procedure

- Operations chosen for unannounced inspections may be random, risk based, or the result of a complaint or investigation. GCIAOCP will instruct inspectors to disclose to the operation the reason that the operation was chosen for the unannounced inspection. Criteria for conducting unannounced inspections may include, but are not limited to:
  - Previous noncompliance issues
  - Complaints
  - Organic and nonorganic production or handling, especially of visually indistinguishable products/varieties
  - Risk of contamination from adjoining land use or commingling, or contamination during handling
  - Complexity of operation
- Unannounced inspections may be employed to fulfill the requirements for annual onsite monitoring inspections as required by NOP § 205.403, but only if the inspector is able to conduct a full inspection of the operation as required by this section.
- Unannounced inspections may be limited in scope, depth and breadth, and may cover only

certain aspects of the operation, such as parcels, facilities, products, etc. This will be determined by the Program Manager in consultation with the Program Administrator, noted on the inspection report form and communicated in advance to the inspector.

- The GCIAOCP Policy and Procedure for conducting unannounced inspections will be provided to all certified operations and inspectors.
- Unannounced inspections, by their very nature, will not include prior notification of the inspector's arrival. However, should there be extenuating circumstances that make it impossible to conduct an unannounced inspection of the operation without prior notification (e.g. biosecurity issues), GCIAOCP may notify the operation up to four (4) hours prior to the inspector arriving onsite to ensure that an appropriate representative is present.
- GCIAOCP inspectors may collect residue samples during an unannounced inspection.
- The GCIAOCP inspector should not enter private property without explicit permission of the operation. Inspectors are required to have adequate identification, such as a business car, and/or explanatory letter from the certifying agency, to demonstrate they are acting on behalf of the certifying agent.
- If an operation refuses to allow a GCIAOCP inspector access to any part of an operation, during normal business hours, including the nonorganic portions of the operation, the operation would be in violation of NOP §205.403, and GCIAOCP will immediately issue a Notice of Noncompliance to the operation.
- An inspection report will be prepared by the inspector, reviewed by the Program Manager and Organic Certification Specialist and sent to the client communicating the results pursuant to NOP §205.403(e) and §205.404(a).
- GCIAOCP may charge an operation for unannounced inspections provided such fees are clearly disclosed to all certified operations in advance. Fees charged must be filed with the NOP Administrator in accordance with NOP §205.642.

**Reference: NOP Guidance Document 2609.**

# APPENDIX C

## GCIA ORGANIC CERTIFICATION PROGRAM

### Policy and Procedure for Reviewing and Verifying the Terms of US and Other Countries' Organic Equivalency Arrangements

#### Policy

To foster trade of organic products among countries, the US and other designated countries have developed equivalency standards that allow products to be represented as organic in each other's markets.

#### Procedure

When an OSP notes that a product may be exported to another country, the Program Manager, Organic Certification Specialist and Reviewer will identify the country(s) and review 5-25-12 MEMO "Exporting USDA Organic Products to the European Union" and the USDA NOP web site to determine what equivalency standards must be met. Whereas this particular MEMO addresses the EU, MEMO does list various web sites that can be used as resources.

When an OSP notes that a product may be imported from another country, the Program Manager, Administrative Assistant and Reviewer will identify the country(s) and review following documents: NOP 2110-1 "Instructions for Completing an NOP Import Certificate" and the USDA NOP web site to determine what equivalency standards must be met.

Once the auditor has reviewed the documents as stated above, the auditor will note if the equivalency standards have been met and cite the appropriate rule and/or guidance document and provide supporting materials.

#### Reference:

NOP Memo 5-25-12 – Exporting USDA Organic Products to the European Union

NOP 2110-1 – Instructions for Completing an NOP Import Certificate

USDA NOP website – [www.ams.usda.gov/services/organic-certification/international-trade](http://www.ams.usda.gov/services/organic-certification/international-trade)

Policy Memo 13

## Appendix D

### GCIA ORGANIC CERTIFICATION PROGRAM Policy and Procedures for Conducting Investigations of Certified Operations for Possible Noncompliance Concerns

#### Policy

To maintain the integrity of the NOP, Certifying Agencies may need to conduct investigations of Certified Operations to determine if certain actions, products, etc. are in compliance with the submitted OSP and the NOP Act. Investigations may be, but not always, connected to complaints from the public or the NOP.

Authority for conducting investigations, and any subsequent actions, is authorized by NOP Policy Memorandum 10-1 and §205.661(a).

#### Procedures

When the GCIAOCP receives a complaint alleging a violation of the NOP Act, the Certified Operation will be contacted and any subsequent violations will be conducted within 30 days.

Should circumstances require more than 30 days to conduct the investigation the NOP Program Manager will be informed.

Within 45 days of receiving the complaint or longer if circumstances require, and the NOP Program Manger agrees, the NOP Program Manager will be notified of the issuances of any noncompliance or proposed adverse actions that are a result of the investigation.

The NOP 4002 “Instructions Enforcement of the USDA Organic Regulations: Penalty Matrix” and the Noncompliance and Adverse Actions Flow Chart will be used in determining corrective action(s) and procedures.

Reference: §205.661(a)  
§204.504(b)(2)  
NOP Memo 10-1  
NOP 4002  
Noncompliance and Adverse Actions Flow Chart



## Appendix E



### GEORGIA CROP IMPROVEMENT ASSOCIATION ORGANIC CERTIFICATION PROGRAM

#### POLICY DEFINING CROP ROTATION

This policy is designed to aid the GCIAOCP staff in determining the adequacy of organic clients crop rotation practices either listed on the OSP or implemented.

The National Organic Program defines a crop rotation as:

The practice of alternating the annual crops grown on a specific field in a planned pattern or sequence in successive crop years so that crops of the same species or family are not grown repeatedly without interruption on the same field. Perennial cropping systems employ means such as alley cropping, intercropping, and hedgerows to introduce biological diversity in lieu of crop rotation.

The most operative phrase is "planned pattern or sequence in successive crop years".

"Planned pattern or sequence"- there should be a multiyear plan for crop rotation that takes in to account the use of different crop kinds that increase soil organic matter, break or disrupt weed, insect and disease cycles, etc. Cover crops can be a component of such a plan or other cash crops.

The term "successive" is straight forward (following in an uninterrupted sequence)

The term "crop years" can be confusing. It seems logical to many that a crop year is the time required to plant and harvest a specific crop, other define crop year depending on spring planted or fall planted.

The disruption of weed, insects, disease cycles and the need to increase soil organic matter should be the defining steps that determine if a particular crop rotation is adequate.

There may be situations whereby that the above suggested cycle maybe altered. The client must submit a written request explaining the reasons for an exception or variance. The Program Manager will be the final authority on such submitted requests.



# Georgia Crop Improvement Association Organic Certification Program

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## Appendix F

Date: June 15, 2018

To: GCAOCP Organic Clients

From: Terry Hollifield, Executive Director

Re: GCAOCP Policy on use of sodium nitrate in organic production

Please see below GCAOCP's policy re: sodium nitrate. This policy takes effect immediately. Any questions or concerns should be addressed to Terry Hollifield and/or Johnny Luke, GCA Organic Program Manager.

*Sodium Nitrate is restricted to no more than 20 percent of the crop's total nitrogen requirement. Total nitrogen requirement will be determined by the University of Georgia Cooperative Extension Service recommendations for the crop being produced. Producers must comply with 7CFR 205.200. (Reference- NOP Notice 12-1) by maintaining or improving the natural resources of the operation, including soil and water quality, and comply with crop nutrient and soil requirements. Exceptions may be made to this policy if reputable scientific data to support other requested nitrogen rates is presented by the grower applicant. A request for exception to this policy must be submitted and approved prior to implementation of said practice.*

## Appendix G



### GEORGIA CROP IMPROVEMENT ASSOCIATION ORGANIC CERTIFICATION PROGRAM

#### DETERMINING BUFFER REQUIREMENTS – GUIDANCE DOCUMENT

In an effort to aid inspection staff in determining if adequate buffers are in place between non-GMO and GMO crops, GCIACP recommends utilizing the isolation distances found in the U.S. Federal Seed Act for “Foundation Class Seed”.

While the established isolation distances contained in the Act refer to pollen movement, these isolation distances should be sufficient for our needs as related to pollen, spray drift, etc.

Distances can be adjusted with proper documentation justifying the change, such as buffer plantings, topography, and manmade structures. In addition, not all vegetable crops are covered; comparison crops may have to be used.

To access this information, see section 201.76, Table 5 in the Federal Seed Act; click [HERE](#).

## Appendix H



### **GEORGIA CROP IMPROVEMENT ASSOCIATION ORGANIC CERTIFICATION PROGRAM**

#### **POLICY DEFINING THE REVIEW OF CLEANERS AND SANITIZERS USED**

This policy is designed to aid the GCIAOCP staff in determining the adequacy and documentation of organic clients' use of Cleaners and Sanitizers per the clients OSP.

Handling; Cleaners and Sanitizers.

NOP205.201(a)(5) identifies the need for review and verification of all sanitizers and cleaners used in a handling system as noted in the OSP Section 5.

All handling OSP's must have a written Standard Operation Procedure that documents the following;

1. What materials are used and at what rate.
2. Removal of residues from materials not found on the National List.
3. How the equipment, product, etc. is tested for 0 residues.  
(Exception is chlorine which is allowed at 4 PPM)
4. Where and how the results of test conducted above are recorded.

The review and verification of the SOP by the GCIAOCP Inspector will be recorded in Section 2, 3 &4 on the inspection report.

Processing aides are found in section 205.605 & 205.606.

The inspector will document that the cleaning/ sanitation and processing aides were reviewed and are compliant with NOP 205(a)(5).

The inspector will document that the pest management products used were reviewed and are compliant with 205.272.

## APPENDIX I



### GEORGIA CROP IMPROVEMENT ASSOCIATION ORGANIC CERTIFICATION PROGRAM

#### POLICY DEFINING INPUTS

This policy is designed to aid the GCIAOCP staff in verifying and documenting organic clients' use of material inputs. NOP 3012 "Interim Instruction Material Review" was used as a guide and should be used by staff when making material input decisions.

##### Materials Review

Only Inputs approved by a NOP recognized MRO will be accepted by GCIAOCP for use and/or those products listed in section 205.600 thru 205.606 of the National List of Allowable and Prohibited Substances.

Certificates must be submitted for all MRO approved inputs.

Material inputs are verified for compliance during the OSP Review and at inspection.

Each scope has a material inputs inventory form as part of the OSP. During the inspection the inspector will verify and document the use of inputs. The inspector should verify that the products and methods were reviewed and are compliant with each section of the applicable NOP standard.

Applicants must sign the Material Inputs form attesting to the fact that they understand any restrictions on the use of restricted inputs found either on the MRO Certificate or on the NOP National List of Allowable and Prohibited Substances.

Developed 8-3-22

## APPENDIX J



### **GCIAOCP Policy For Operations Not Anticipating Organic Production at Initial Certification or Annual Renewal**

1. The operation does not submit a completed product profile, listing organic ingredients and provide current organic certificates.
  - a. An on-site inspection will determine if the operation has sufficient handling and recordkeeping practices to maintain organic integrity.
  - b. An Area of Concern may be attached to the certification approval, stating that supplier information must be submitted prior to organic production taking place, along with proof of purchase of organic products before processing.
  - c. The operation will be issued an organic certificate for “Facility Only”
  - d. The current organic product summary can list no products. Then, if the operation would like to begin producing products they should submit a completed Organic Product Summary, the Product Profile with supplier information, certificate and labels for approval.
  - e. Review the Organic Product Summary, Product Profile, supplier information, certificates and labels, to determine compliance.
  - f. Once approved, their Organic Certificate will be updated and approved products will be added to their Organic Certificate.
  - g. Organic production activity will be verified at the annual renewal audit.
2. The operation does submit a completed product profile, listing organic ingredients and provide current organic certificates.
  - a. An on-site inspection will determine if the operation has sufficient handling and recordkeeping practices to maintain organic integrity.
  - b. Review the Organic Product Summary, Product Profile, supplier information, certificate and labels to determine compliance.
  - c. Once approved, their Organic Certificate will be updated and approved products will be added to their Organic Certificate.
  - d. Organic production activity will be verified at the annual renewal audit.



## APPENDIX K

### Preparing for Mass Balance & Traceback Audits during an Organic Inspection

The intent of the audit is to satisfy the requirements of §205.103 and NOP 2601 Instruction. These regulations require audits as an important tool for preventing fraud and ensuring sufficient recordkeeping to verify organic integrity. During the audit, the record keeping system as described in the Organic System Plan (OSP) will be verified with the client onsite. Also, clients are reminded to update their OSP throughout the year as changes are made and/or required.

For each operation's annual inspection, a minimum of one traceback audit will be conducted. If several different products or processes are present, two or three traceback audits may be conducted to demonstrate that the different types of products are fully traceable. If the results of the first audit are inconclusive or potentially noncompliant, an additional traceback audit will be conducted unless the reason for the audit failure is a system-wide record issue that would yield no different results upon another audit attempt.

In addition, one mass-balance audit will be conducted per operation at the annual update inspection. For processor/handler operations the mass balance audit will include a finished goods and raw ingredient mass balance, ideally with these two audits being tied together when possible.

If the client provides computer records for an audit, the inspector will verify some of the figures against actual records (field logs, weight tickets, etc.) during the audit to verify the client's audit trail system. Records should be assessed for completeness and ability to be audited.

**NOTE: Records must include a BEGINNING and ENDING inventory (including ingredients, raw materials, finished product and/or crops produced) for a DEFINED period of time (example: month, quarter, growing season). Also, clients should prepare in ADVANCE of the audit all records/documentation necessary to conduct the mass balance and traceback audits.**

#### Mass Balance Audit

The intent of the mass balance audit is to demonstrate that enough organic ingredients or products were purchased, produced, harvested or managed (livestock) to equate to the final product during the audited time period. This audit encompasses a window of time (sales quarter, growing season, etc.). A mass balance audit does not require that all ingredients/crops/feed types are encompassed in the audit; the audit should demonstrate a sampling of the ingredients/crops/feed types for a period of time to verify that the system is auditable.

#### Traceback Audit

The intent of the traceback audit is to demonstrate that an organic product can be traced back to its origin in the operation. A product sold or finished good or livestock is selected; the inspector attempts to identify linking elements on the client's documents (lot numbers, invoice numbers, etc.) to verify that the product (or ingredients or animal) can be traced back to the field of origin or supplier. These linking elements and numbers will be verified by the inspector and included in the inspection report.

*\* Should the client not have sales during the audited period, the inspector will verify and document that the system the client plans to use for tracking will provide sufficient data to allow for mass balance and traceback audits to be performed.*

October 2018