

# Introduction: Developing an Organic System Plan

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Once you choose a certifying agent to work with, you will be asked to complete an application that provides information about your operation to assess whether it is in compliance with National Organic Program (NOP) regulations. This application serves as your farm's Organic System Plan (OSP) and will be your first formal communication with your certifying agent. It is a good idea to spend some time reviewing a blank application to understand what information you will need to gather and document. The amount of time it takes to successfully certify your farm will depend on the amount of detail you include in your OSP. If it is incomplete or lacks necessary specifics, you will be asked for additional information and will thus delay the next steps of the certification. *This process can already take a minimum of two months, so plan ahead and be thorough.*

Included in this section of the handbook is one single, very detailed document from ATTRA called *Organic System Plans: Market Farms and Greenhouses*. This comprehensive publication walks you through each page of the standard application used by certifying agents. It explains what information you must provide and why it is relevant. Do not be misled by the name of this useful resource: Larger-scale vegetable producers have to submit the same Organic System Plan as smaller, more diversified producers and will find the step-by-step format just as helpful in understanding what goes into the OSP.

Writing down what has happened on your farm for the past 3 years and what your plans are for the coming season may seem daunting, especially since your OSP is a legally binding document. Keep in mind that it is possible to make changes to it throughout the year if you run into unforeseen difficulties and must deviate from your intended plans. Be sure to maintain open communication with your certifying agent about these potential changes and avoid acting impulsively without notifying them. When you do need to make a change, such as using a new input or changing your cropping plants, your certifying agent should supply you with some form of written confirmation (including email) that the change has been made officially in your OSP. You should keep a record of these communications for future reference.

## From the NOP

Following is an excerpt from the NOP Final Rule regarding OSP requirements:

### **§ 205.201 Organic production and handling system plan.**

(a) The producer or handler of a production or handling operation, except as exempt or excluded under § 205.101, intending to sell, label, or represent agricultural products as

“100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s))” must develop an organic production or handling system plan that is agreed to by the producer or handler and an accredited certifying agent. An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan must include:

- (1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;
  - (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;
  - (3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented;
  - (4) A description of the recordkeeping system implemented to comply with the requirements established in § 205.103;
  - (5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and
  - (6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.
- (b) A producer may substitute a plan prepared to meet the requirements of another Federal, State, or local government regulatory program for the organic system plan: Provided, That, the submitted plan meets all the requirements of this subpart.