

2024 TDA ORGANIC PRODUCER ANNUAL UPDATE GUIDANCE

ANNUAL UPDATE SUBMISSION REQUIREMENTS

- **Logging In:** Instructions for the login process and navigating the system in general are attached with your renewal email. Here is the direct link <https://admin.field2base.com/>, you may click “forgot password” and reset your password if needed. The company ID will always be 4178 (see instructions for pictures and descriptions), and your username will be the email associated with your account with us.
- Please do not submit individual forms through Field2Base until you are ready to submit all other applicable supporting documents and payment.
- You will locate your most recent ROR-607 (this could have been completed during last year’s renewal, possibly during your inspection, or during your final review) under the Sent tab of Field2Base. Click to Quick Copy the most recent ROR-607. If you have questions on this process, the attached instructions describe the steps on Page 7. Please contact program staff directly, if you need further assistance.
 - Please review your full ROR-607 form to ensure all answers are still completed, and the information is still accurate. On the 1st page, there is a navigation box where you can choose the section you would like to move to directly. After you choose the section in the dropdown you will click the gray box “Go to ROR-607 Section”.
 - The system automatically saves the form as you progress as long as you are connected to the internet. You will consistently see a red box in the lower right corner that states “Unsaved Changes”, and about every 10 seconds you will see the box transition to a blue pop-up box that states “Saving”, then a green pop-up box that states, “Changes saved to the server”.
 - In addition to the automatic save feature, you can also go to Actions, and choose Save Draft as well.
 - Make sure to sign the last page.
 - To send the completed form you will choose Ready for Review at the bottom of the Home page (page 1), then press Submit. Once you submit any form it will move the completed form into the Sent tab. You can download PDF versions of all forms in this section.
- In your Field2Base account, you should not have any unfinished forms under your Drafts tab or My Work tab. Unless you have been actively working on updates prior to your renewal, any forms should be deleted to reduce confusion. If you have questions, please feel free to reach out to us and make sure, but most likely the forms were opened, but not deleted.
- **ROR-607 Sections that are required to be updated yearly:**
 - Section H (1-3): Update any crop plan information that is applicable to your operation.
 - Section O: Update any crop rotation plan information
 - Section V: Update any material information
 - Section X: Update your seed information
 - Section Y: Update your nonorganic seed search information (remember to list each kind and variety of nonorganic seed, list pending if not purchased for the year)
- **New Crop and/or New Land**
 - If you have a new crop planned (one that isn’t listed on your 2023 certificate), or a new field, please make sure to let us know earlier than later so we can make sure to:
 - 1.) get the crop added to your certificate prior to harvest and
 - 2.) get an onsite inspection for the new land (an onsite inspection is required before it can become certified organic).
 - You must submit:
 - ROR-621 Land Management Affidavit
 - Appropriate maps of the new fields (with all required information- refer to the examples in Field2Base)
 - Add the field information to all appropriate sections on the ROR-607, at a minimum: Sections F, G (if applicable), H1-3, I, O, X, and Y.
 - Make sure to update your total acreage in your ROR-601 payment form.
 - TDA may ask for additional documentation, such as FSA Records.

2024 TDA ORGANIC PRODUCER ANNUAL UPDATE GUIDANCE

Items that are still MAILED:

- Payment- you will still mail the payment to the address below. Please complete and submit the ROR-601 in the system, but you will also print the document out to mail with your payment. Only check, cashier's check, or money order is accepted, and make payment out to Texas Department of Agriculture. Place check and ROR-601 at the top of any other mailed documentation.

**Texas Department of Agriculture,
Organic Certification Program
P.O. Box 12077
Austin, TX 78711**

Items that are still EMAILED:

- Operations are required to review their organic system plan form and supporting documentation (i.e. maps, soil analysis results, etc.) to determine what information must be updated and/or revised.
- Supporting Documents that have been updated or are new (updated maps, updated SOP's, material labels/affidavits/product information, seed information (if already purchased)). These documents should be emailed to program at organic@texasagriculture.gov. If mailed, you must keep original copies for yourself.

WHAT ARE THE EXACT STAGES OF RENEWING MY ORGANIC CERTIFICATION?

Step 1: Submission of annual update and certification fee payment

In accordance with §205.406 of the National Organic Program (NOP) Regulations, certified operations are required to submit an updated organic system plan and fee payment annually. Per §18.702 of the Texas Organic Standards, late fees will be incurred by operations that fail to submit all required annual update documents and fee payment by the identified due date.

Step 2: Initial Review Process

Once your fee payment and annual update documentation are received, TDA will conduct a review to verify that full fee payment was received, and your Organic System Plan (OSP) is complete and in compliance with the NOP Regulations. If your OSP is found to be incomplete, TDA will contact you in writing to request the additional information. If additional information is requested, you must respond within the time period provided by supplying the additional information or documentation. If your response is not received within the provided time period and you do not contact TDA, corrective action and additional fees may be applied to your organic certification. Per NOP 2603 3.4 Updated certificates may be issued after reviewing the annual update or after the annual inspection is completed.

Step 3: Annual On-site Inspection

Once the initial review process is complete, your OSP will be forwarded to an inspector who will schedule and conduct your annual on-site inspection.

- An operation may be approved for inspection with pending items when the update OSP is only lacking minimal information. If your OSP is approved for inspection with pending items, you must have the requested information readily available for the inspector at the time of inspection.
- Operations must cooperate with the inspector to schedule and perform all duties associated with the on-site inspection.
- An authorized representative who is knowledgeable about the operation must be available at all times during the inspection.
- Operations must have all records and documentation available at time of inspection and must provide access to all production or handling sites, including nonorganic production, and handling sites.
- Alternatively, your operation may be subject to an unannounced inspection at this point as well.

2024 TDA ORGANIC PRODUCER ANNUAL UPDATE GUIDANCE

Step 4: Final Review

Once the on-site inspection has been completed, TDA will conduct a final review of all documentation and notify your operation of the findings.

- Operations must correct any identified areas of non-compliance, including additional requirements within a reasonable time period.

SUPPORTING DOCUMENTS LISTED IN SECTION C OF THE ROR-607 THAT MUST BE UPDATED:

- **Strengthening Organic Enforcement (SOE) implemented many changes to the regulations to strengthen the chain of organic production and handling to ensure the integrity of the product is maintained.** In 2022 and 2023, TDA required the submission of Monitoring Practices and Procedures in order to comply with the regulation §205.201(a)(3). This rule has been updated to add the requirement- “This must include a description of the monitoring practices and procedures to verify suppliers in the supply chain and organic status of agricultural products received, and to prevent organic fraud, as appropriate to the certified operation's activities, scope, and complexity.” This is now commonly being referred to as a ‘Fraud Prevention Plan’. The definition of Organic Fraud was also added to the regulations: **NOP §205.2 Organic Fraud-** Deceptive representation, sale, or labeling of non-organic agricultural products or ingredients as “100% Organic”, “Organic”, or “Made with Organic (specified ingredients or food group(s)).
 - **You must complete the ROR-605F (Organic Fraud Prevention Form), which is now in your Field2Base form listing (under Blank forms). Review the instructions and overview in the form to understand the task more completely.**
- Copies of all material product labels that are not approved by OMRI, WSDA, or the EPA, and if necessary, a complete listing of ingredients (including inert/other ingredients). Please refer to the paragraph titled Input Material Review for further direction.
- Copies of all OMRI certificates for approved materials, or direction to exact product listing approval under WSDA or CDFR.
- OMRI (or another material reviewer) will list a restriction on the product if it is intended for use to address a nutrient deficiency, If you are using any such product, please provide a copy of your soil analysis report to verify the deficiency.
- Copies of organic certificates for all certified organic seed.
- The [National Organic Program \(NOP\) Regulations](#) require that a producer **MUST** use organically grown seed for all certified organic crops. However, **non-organic seed may be used if organic seed is not available in the appropriate form, quality, or quantity** that you need for your operation. If you do use conventional seed, you must be able to prove that you attempted to find appropriate organic seed. A written record of what seed varieties you were looking for; what companies you searched or called; and the date of your inquiry is often sufficient evidence for certifying agents. Three search attempts should be listed for ALL nonorganic kinds and varieties used in your operation in Section Y Planting Stock Search of the ROR-607 TDA form.
 - Remember: the costs related to using organic seed cannot be used as justification to use conventional seed.
 - Remember: secure proof from the seller about the seed itself, either in the form of a letter provided by the company you purchased the seed from, or a receipt or tag that shows it is untreated and non-GMO. The best time to get this documentation is when you purchase the seed. The inspector and/or program staff will ask for it, and it can often be difficult to obtain after the fact.
 - The following websites provide useful information regarding organic seed sources:
<https://www.mofga.org/resources/uncategorized/organic-seed-sources/>
 - <https://paorganic.org/resources/organic-seed-finder/>

2024 TDA ORGANIC PRODUCER ANNUAL UPDATE GUIDANCE

SEED SEARCHES:

- For every nonorganic seed you use, you are required to complete three searches for an organic version of every variety of that seed. So, if you use three different corn varieties, you need three searches for each variety.
- Your searches need to be with a legitimate supplier that would actually be able to source/sell that organic seed. Reminder- by regulation, you MUST use organic seed. If organic seed is found to be commercially unavailable, TDA grants you an exemption for that seed.
- There are three reasons to receive an exemption to use nonorganic seed: commercially unavailable, quantity, quality. Regardless of the fact that you know it will probably not be available, documented search attempts are required.
- We can be flexible with how this is documented, if you prefer not to utilize Section Y of the ROR-607, you can request to send in an alternative recordkeeping system.

DOCUMENTATION FOR SEED:

- TDA offers a Seed Affidavit template in Field2base to provide your seed suppliers to verify the non-GMO requirement, along with the treatment information. This specific document is not required; you can also use any other documents the suppliers is willing to provide to confirm this information.

EDUCATIONAL RESOURCES:

- NOP provides training courses in the Organic Integrity Learning Center on a variety of topics to understand organic certification, as well as new rules changes such as SOE (Strengthening Organic Enforcement), OOL (Origin of Livestock), OLPS (Organic Livestock and Poultry Standards). There are many great courses you may be interested in, and could provide insight as to why TDA requires specific information.
- Here is the link to the NOP website with all of the information to register:
<https://www.ams.usda.gov/services/organic-certification/training>
- This is the specific link to register for an account:
<https://usda.geniussis.com/PublicStudentSignUp.aspx?AffiliateID=46B0C0>

INPUT MATERIAL REVIEW

In a policy memorandum dated January 21, 2011, the USDA National Organic Program clarified the process of how TDA and all other certifying agents must conduct input material reviews. Based on this memorandum, TDA will only be able to review and approve formulated materials when a complete listing of ingredients (including inert/other ingredients) is submitted to TDA or when approved for use in organic agriculture by the Environmental Protection Agency (EPA), or an approved material reviewer such as the Organic Material Review Institute (OMRI), the Washington State Department of Agriculture (WSDA), California Department Food and Agriculture (CDFA), or Pennsylvania Certified Organic (PCO).

SPECIAL NOTE ON ADDING HEMP TO YOUR CROP CERTIFICATION:

In order to comply with NOP Instruction 2040, you must submit a copy of your state, tribal, or federal license or registration with your application for certification.

SPECIAL NOTE ON INTERNATIONAL TRADE AGREEMENT COMPLIANCE REVIEWS:

TDA recommends that you contact those entities who will be contracting with, purchasing your crops, marketing your crops, etc. to determine if your crop may be exported out of the United States. If so, identify the applicable trade agreements that your crops must comply with in Section E International Markets of the ROR-607, and include the international trade agreement review fee of \$75.00 for each trade agreement review that must be conducted by TDA in Section H of the ROR-601 Fee Payment Forms.

2024 TDA ORGANIC PRODUCER ANNUAL UPDATE GUIDANCE

HOW DO I SURRENDER MY ORGANIC CERTIFICATION?

If you no longer wish to continue your organic certification, please submit the ROR-625 Organic Certification Surrender Form which can be found in your online account.

Documentation that must be submitted by Certified Organic Livestock Producers:

- *All sections of the ROR-603 Livestock Producer Organic System Plan form must be reviewed and/or updated.*
- Copies of organic certificates for organic livestock feed, including hay and supplements.
- Split operations must submit any additional supporting documentation that describes the management practices and physical barriers established to prevent commingling of organic and nonorganic products.
- An updated ROR-624 Livestock Outdoor Access Calendar.
- An updated ROR-623 Organic Livestock Dry Matter Worksheet for each production group (ruminant livestock producers only).
- DMI worksheets for each production group must be submitted at a minimum- with the renewal, during the inspection (assuming mid-year), and immediately when the grazing season is completed for the year.
- Livestock producers are also subject to the rule change above related to the Organic Fraud Prevention Plan. This plan may be presented as one document covering all scopes.