

# 2018 ORGANIC PRODUCER ANNUAL UPDATE INFORMATION

## **GUIDELINES FOR ELECTRONIC DOCUMENT SUBMISSION:**

TDA Information Security Policy, TDA cannot guarantee receipt of documents to staff members' personal email addresses. Please follow these two guidelines when submitting documentation electronically:

1. Send all electronic copies of documents to [Organic@TexasAgriculture.gov](mailto:Organic@TexasAgriculture.gov).
2. Make sure that total size of any email with attachments is 8 megabytes (MB) or less.

## **ANNUAL UPDATE SUBMISSION REQUIREMENTS**

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. You are only required to submit those sections and forms that must be updated annually or revised to reflect the current production practices of your operation. The following is a listing of documents that must be updated and submitted to TDA:

### **Sections of the [ROR-607 Land Producer Organic System Plan form](#) that must be updated:**

- Section A: check the box for annual update. If you are adding acreage and/or square footage amounts for your operation, please check the change to OSP box in addition to the checking the box for annual update.
- Section B: identify all sections that have been updated by marking the appropriate box.
- Section E: Complete the field crop/greenhouse plan for the one-year certification period. (An electronic copy of the Excel workbook may be submitted as an alternative to an updated Section E of the ROR-607 Form.)
- Section F: Identify materials used during the previous year and materials that you have used and/or plan to use on your organic and transitional field/crops during the certification year. (An electronic copy of the Excel workbook may be submitted as an alternative to an updated Section F of the ROR-607 Form.)
- Section O: sign and date the affirmation statement.

### **Supporting Documents listed in Section B of the ROR-607 that must be updated:**

- 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.
- If a restricted input material has been used or is intended for use to address a nutrient deficiency, please provide a copy of your soil analysis report.

### **Sections of the [ROR-622 Seed and Planting Stock Disclosure Form](#) that must be updated:**

- Section A: Enter your account name, client number and TDA account number.
- Section B: Complete this table for all organic and nonorganic seed used or planned for use. Attach additional copies of Section B continued as needed.
- Section C: List the names and contact information of seed and/or planting stock suppliers contacted regarding the availability of the nonorganic seed and/or planting stock that will be used. Attach additional copies of Section C for each different nonorganic type of seed/planting stock and variety.
- Section D: Mark each box, print and sign your name, and date the form.
- Copies of organic certificates for all certified organic seed. Please note, due to our new Policy on use of Certified Organic Seed and Planting Stock, additional input fees are not accrued if organic seed certificates with complete product profiles are submitted for each seed variety.

*(An electronic copy of the Excel workbook may be submitted as an alternative to an updated ROR-622 Form.)*

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## **Documentation that must be submitted by Certified Organic Livestock Producers:**

- **All sections of the [ROR-603 Livestock Producer Organic System Plan form](#) that must be updated.**
- Copies of organic certificates for organic livestock feed, including hay and supplements.
- An updated [ROR-624 Livestock Outdoor Access Calendar](#).
- An updated [ROR-623 Organic Livestock Dry Matter Worksheet](#) (ruminant livestock producers only).

## **All forms are available on our website:**

<http://www.texasagriculture.gov/RegulatoryPrograms/Organics/OrganicsForms.aspx>.

**You may also request printed copies of the form by contacting our office.**

## **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), the Organic Material Review Institute (OMRI), or the Washington State Department of Agriculture (WSDA).

## **HOW DO I RENEW 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 is 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.

### **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.

- Operations will not be inspected until full payment has been received. This includes any applicable late fees.
- 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 the on-site inspection.

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- 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.

### **Step 4: Final Review**

Once the on-site inspection has been completed, TDA will conduct a final review of all documentation and make a certification decision.

- Operations must review the certification decision letter and updated certificate (if granted) for accuracy and report any discrepancies to TDA for review or correction.
- Operations must correct any identified areas of non-compliance, including additional requirements within a reasonable time period.

### **HOW DO I SURRENDER MY ORGANIC CERTIFICATION?**

If you no longer wish to continue your organic certification, please complete and return the [ROR-625 Organic Certification Surrender Form](#). Do not return the ROR-625 form if you are updating your organic 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, please identify the applicable trade agreements that your crops must comply with and include the international trade agreement review fee of \$75.00 for each trade agreement review that must be conducted by TDA.

### **SPECIAL FOCUS OF PROGRAM STAFF FOR THE 2018 ANNUAL UPDATE REVIEWS:**

Each year the TDA Organic Certification Program conducts an internal program review of our review processes to identify areas of improvement in our review process. The 2017 internal program review found that our annual update initial reviews need to commit additional focus on ensuring that all crop operations are fully compliant with §205.203(b) of the NOP Regulations by utilizing crop rotations. If you plant the same annual crop in a field in 2018 as you did in 2017, please submit evidence of how your operation maintains compliance with §205.200 of the NOP Regulations. Some examples of acceptable forms of supporting evidence are soil analysis report of samples taken from 2016 through 2018 that show maintenance of or an increase in organic matter for the field in question; crop yield records for the field in question that span 3 or more years (Crop records showing a crop failure for any reason other than natural disaster will not be accepted.); and Extension research documents concerning the crop produced and soil types for your specific area that are coupled with soil tests that identify the soil type for the field in question.