

# An Introduction to the National Organic Program (NOP) for Producers

Organic requirements are in addition to other statutory requirements  
Statutory information is for guidance only and is correct at time of going to print

## Introduction

The United States Department of Agriculture (USDA) has established the National Organic Programme to control the labelling, composition, production and processing of organic food products.

This applies to all organic products imported into the USA and all such products must have been produced in accordance with the NOP by a producer or processor certified by a certification body directly or indirectly accredited with the NOP

To assist the UK organic sector to comply with this, Defra has been recognised by the USDA under their Foreign Government's Conformity Assessment Programme under which the UK certification bodies, including OF&G, can operate. ([www.ams.usda.gov/nop/nop/tradeissues/unitedkingdom.html](http://www.ams.usda.gov/nop/nop/tradeissues/unitedkingdom.html))

The US and the EU do not currently recognize each other's standards, due to major and apparently irreconcilable differences. In some areas, notably livestock production, the US has higher standards and in others, such as crop production, lower standards. In the processing (called 'handling' in the NOP Standards) sector, some additives and processing aids permitted by the EU are not permitted by the NOP and vice versa.

This makes it very complex for importers and processors to deal in products destined for the US as in theory a raw material, produced to the NOP Standards, in a third country could be imported into the UK but if not compliant with the EU Regulations, it would have no organic status in the UK even though it was destined for re-export to the US.

To avoid this problem ever arising, Defra has decreed that all products destined for export to the US must be produced, processed or imported in compliance with the EC Regulation 2092/91, as defined in the OF&G Control Manual and Defra Compendium of UK Organic Standards.

This means that operators applying to OF&G for the NOP certification must:

- Be certified under the OF&G/Defra Certification Programme in accordance with the procedures and Standards specified in the OF&G Control Manual.
- Be careful to ensure that they are compliant with the relevant sections in both the OF&G Control Manual and the NOP Control Manual, particularly the permitted inputs listed in Subpart G – Administrative - The National List of Allowed and Prohibited Substances.

## Who Needs to Apply for NOP Certification?

The following producers must be subject to the NOP Certification Programme:

- Farmers who provide crops to processors who export raw materials in bulk to the USA;
- Farmers who supply raw materials to processors who manufacture products for export to the USA;
- Farmers who directly export raw materials to the USA.

## OF&G NOP Certification Programme

OF&G has established the NOP Certification Programme for those producers and processors that need to comply with one of the above requirements. The documents supporting this programme are described below:

### NOP Control Manual

Due to the complexity of the US standards, a separate NOP Control Manual has been developed, which:

- Sets out the NOP regulations;
- Identifies the differences between the materials on The National List of Allowed and Prohibited Substances and the OF&G Control Manual and Defra Compendium of Standards.

### How does the NOP Certification Programme fit in with the basic organic certification?

The NOP Programme is a bolt-on module to the basic organic standards. As a first requirement, all operators must be compliant with the Regulation (EEC) 2092/91 and be subject to inspection and certification by an approved certification body.

There are some inputs which are permitted under the NOP which are not permitted in the EU and UK Standards. These are marked in the NOP Control Manual as NOT PERMITTED.

Similarly there are some inputs which are permitted in the OF&G Control Manual and Defra Compendium of Standards but not permitted in the NOP. These are marked in the OF&G Control Manual as **National Organic Programme – Not Permitted**.

### What are the key differences between the OF&F/Defra Standards and the NOP Standards?

#### Organic Production System Plan

Section 205.201 of the NOP Control Manual specifies that the production or handling (processing) operation must develop an organic production or handling system plan that is agreed to by the operator and the certification body. An organic production or handling system plan must include:

- A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;
- 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;
- 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;
- A description of the record keeping system implemented to comply with the requirements established in § 205.103;
- A description of the management practices and physical barriers established to prevent commingling of organic and non-organic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances; and
- Additional information deemed necessary by the certifying body to evaluate compliance with the regulations.
- 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.

## **Crop Production**

The conversion period, during which the land must be under organic/NOP management is three years (36 months) prior to the harvesting of the first NOP crop.

Raw animal manures must be incorporated into the soil not less than 120 days prior to the harvest of a crop whose edible portion comes into contact with the soil.

Raw animal manures must be incorporated into the soil not less than 90 days prior to harvest of a crop whose edible part does not have contact with the soil.

Composted plant and animal materials are more precisely defined in terms of C:N ratios, minimum temperatures and composting times.

The lists of permitted crop fertilising, pest control and hygiene inputs differs in detail from those permitted in the OF&G Control Manual.

## **Livestock Production**

Simultaneous conversion of the stock with the land is not permitted.

A dairy herd must have been under continuous organic management for 12 months prior to the production of organic milk. During the first nine months, the stock can be fed 90% organic feed but during last three months and thereafter the stock must fed 100% organic feed.

The agricultural component of all feed rations must be 100% organic. There is no provision for conversion and non-organic feed.

Parasiticides - only Ivermectin is permitted and may only be used on:

- Breeder stock prior to the last third of gestation but not during the lactation of progeny that are to be marketed as organic;
- Dairy stock when used a minimum of 90 days prior to the production of organic milk.

Synthetic parasiticides are prohibited for all slaughter stock to be marketed as organic.

Antibiotics are prohibited for all stock.

The lists of permitted feed additives, veterinary treatments and disinfectants are much more restrictive than those permitted in the OF&G Control Manual.

Due to the requirement for 100% organic feed and the prohibition on the use of antibiotics, the production of livestock to the NOP standards would appear to have great practical difficulties for UK farmers.

## **How to apply for NOP Certification**

Request the NOP Certification Pack from your certification officer. They will send you the following:

- Technical Leaflet TL 121.
- NOP Control Manual

The NOP inspection will be carried out with your annual inspection.

Once compliance with the NOP Control Manual is demonstrated and the certification has been completed, a separate Certificate will be issued specifying those products that are NOP certified.

The Schedule to the Certificate will specify the enterprises and products that have been certified under each OF&G programme, including the NOP Programme.

## What NOP logo or identification can be used?



When the inspection and certification process has been successfully concluded, an NOP Certificate will be issued. This identifies the products and/or enterprises that have achieved NOP status. The following logo may then be used on the specific products certified:



The USDA Seal can also be used provided that the specific requirements in Section 205.311 of the NOP Control Manual are met. A digital version is obtainable from the USDA Web site (see Further Information below) or from OF&G.

## Do all the operator's products have to be certified to the NOP?

This is not obligatory. Only those products for which an application has been made will be subject to NOP certification. The Certificate and Schedule will specify the enterprises and products that have been certified to the NOP.

## Further Information

For further information or to ask for a NOP Certification Programme application pack contact the OF&G Certification office.

Tel. 01939 291800 or 0845 3305122 (local call rate)

Fax. 01939 291250 or 0845 3305123 (local call rate)

Email [info@organicfarmers.org.uk](mailto:info@organicfarmers.org.uk)

Web site [www.organicfarmers.org.uk](http://www.organicfarmers.org.uk)

Further information about the USDA National Organic Program can be obtained from the USDA Web site [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop)