



## INTERNATIONAL ORGANIC PROGRAM CROP PRODUCER ADDITIONAL REQUIREMENTS

The Washington State Dept. of Agriculture (WSDA) International Organic Program<sup>1</sup> provides verification of products with international organic standards. Operations that participate in this program ensure access of their organic products to international markets that do not accept US Organic Certification as verification of organic compliance. **The WSDA International Program is designed as an addendum to USDA National Organic Certification; applicants must first meet the requirements of the USDA National Organic Standards before additional international certifications are granted.** An application for the WSDA International Organic Program includes an evaluation of organic products in accordance with the requirements of the following:

- ❑ **EUROPEAN UNION**
- ❑ **CANADA<sup>2</sup>**
- ❑ **JAPAN<sup>3</sup>** - Refer to Page 8 for Details on the Japan Compliance Program. If interested in Japan compliance ONLY, contact our office to discuss this process.



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### WSDA EUROPEAN & CANADIAN ADDITIONAL REQUIREMENTS

The USDA National Organic Standards are similar in most areas with the organic standards in the European Union and in Canada. However, the European Union and Canadian standards have additional requirements that are not included in the USDA National Organic Standards. In order to comply with these international organic standards, the following requirements must be met *in addition to* the standards set forth by the National Organic Program. These additional requirements are adopted from the European Council Regulation EC 834/2007 (Formerly EC 2092/91)<sup>4</sup> and Commission Regulations EC 889/2008, 1235/2008, the Canadian Organic Standards (CGSB-32.310 and 311-2006 - Amended October 2008), the Canadian Organic Products Regulations (SOR/2006-388)<sup>5</sup>, and the International Federation of Organic Agricultural Movements Basic Standards (IFOAM). The full text of these international organic standards can be found at the following websites:

- ❑ European Union Regulations can be found at [http://www.organic-europe.net/europe\\_eu/eu-regulation-2092-91.asp](http://www.organic-europe.net/europe_eu/eu-regulation-2092-91.asp)
- ❑ Canadian Organic Regime Standards can be found at [http://www.tpsgc-pwgsc.gc.ca/cgsb/on\\_the\\_net/organic/index-e.html](http://www.tpsgc-pwgsc.gc.ca/cgsb/on_the_net/organic/index-e.html)
- ❑ IFOAM Basic Standards and Accreditation Criteria can be found at [http://www.ifoam.org/about\\_ifoam/standards/index.html](http://www.ifoam.org/about_ifoam/standards/index.html)

The European & Canadian Additional Requirements are outlined in the following Sections:

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<sup>1</sup> Formally the WSDA European Organic Verification Program

<sup>2</sup> The Canadian Organic Standards and Organic Products Regulation are scheduled to go into effect June 30, 2009. WSDA International Program Requirements are subject to change before, or upon, implementation of the Canadian Organic Regime (COR).

<sup>3</sup> Refer to Page 8 for details on the Japan Organic Compliance Program. Evaluation of crops under this program is in accordance with the USDA - MAFF Japan Export Arrangement as published on the USDA National Organic Program website. WSDA does not grant JAS certification of crops or products.

<sup>4</sup> WSDA Organic Food Program is compliant with ISO Guide 65 / EN 45011, as required by European Union Regulations.

<sup>5</sup> Canadian Organic Products Regulations has not been finalized as of the date of this document revision.



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### A. SCOPE

1. In order to sell, label, or represent products as “organic” in the European Union or Canada, these requirements must be met in addition to the standards set forth by the National Organic Program. Certification with the WSDA International Program is an additional certification and may only be granted simultaneously, or after USDA National Organic Program certification is granted. *Note: WSDA Transitional Certification is not part of USDA Organic Certification.*
2. Organic livestock production is not eligible to be certified under the WSDA International Program.
3. Producers that wish to participate in the WSDA International Program must apply for the additional certification when applying for USDA National Organic Standard certification, or during the yearly renewal process.
4. Producers who wish to have products certified under the WSDA International Program must keep records regarding the product’s compliance with these additional requirements as well as compliance with the USDA National Organic Standards.
5. Organic products certified under the WSDA International Program must be protected from commingling with crops produced under different management systems such as US organic, transitional, or conventional systems. Protection from commingling must be in place throughout production, harvest, storage, and handling.
6. WSDA International Program Certification is on a site-by-site basis. Crops certified under the WSDA International Program must be located on a designated site that does not include crops produced under different management systems such as US organic, transitional, organic but not certified, or conventional.
7. Producers applying for international certification must include an estimate of potential yields for the coming year. Operations must be prepared to provide and substantiate this estimate based on current conditions, crop health, etc.

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### B. DEFINITIONS

1. **Biodiversity** – The variety of life forms and ecosystem types on Earth. Includes genetic diversity (diversity within species), species diversity (the number and variety of species) and ecosystem diversity (total number of ecosystem types).
  2. **Primary ecosystems** – Land that is in its natural state and has not been cultivated within the last 100 years.
  3. **Split Production** – Where only part of the farm or operation is certified as organic under the WSDA International Program. The remainder of the operation can be (a) US organic, (b) transitional, (c) organic but not certified, or (d) conventional. For example: A farm that produces international organic cherries and US organic apples or conventional apples would be considered split production.
  4. **Parallel Production** - Parallel production is a special type of split production. Parallel production is where the same operation is growing, handling or processing the same crops or varieties using two different production systems. For example: A farm that produces international organic apples and conventional apples would have parallel production. In addition, a farm that produces international organic *gala apples* and US organic *gala apples* would have parallel production.
  5. **Wild Harvested Crop** - A crop grown outside of an agricultural system and harvested for processing or sale.
  6. **Wild Harvester** - The person responsible for managing the harvest of wild plants.
  7. **Collector** - The person directly involved in the harvest of the wild plants.
  8. **Sustainably Harvested** - Harvesting a wild crop without damaging the natural ecosystem, as determined by the WSDA Organic Program Staff in consultation with natural resource managers, non-governmental agencies and other interested parties.
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### C. CONVERSION TIME

1. All sites, fields and orchards must not have any WSDA International Program prohibited materials applied within 36 months of the first international organic harvest. WSDA reserves the right to determine that an operation has converted in compliance with these requirements through a review of sufficient documentation of material application records and conversion practices. *Please refer to Section F below for a list of prohibited crop production materials.*
2. All sites and fields must be under inspection with the WSDA Organic Program for at least 12 months prior to obtaining international organic certification.
3. Sites will be considered within the WSDA organic certification program from the time they first apply with WSDA for certification as either transitional or US organic.

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### D. SPLIT PRODUCTION AND PARALLEL PRODUCTION –

1. If the whole farm is not converted to international organic certification (split production), the international organic crops shall be clearly and continuously separated from different production systems that exist on the farm.
2. Simultaneous production of the same international organic, US organic, transitional, and/or conventional crops (parallel production) is **prohibited**. (For example: a farm may not produce both international organic apples and conventional apples). **Exceptions to this prohibition** may be granted under the following conditions:
  - a. Varieties are visually distinguishable OR
  - b. Production is undertaken in a way that allows clear and continuous separation of all crops AND
  - c. Additional inspections shall occur during harvest or other critical times to evaluate separation of the same varieties of international organic and US organic or conventional crops.

*Operations that are able to evidence that organic and conventional production are physically, financially, and operationally separate, will not be considered as engaging in parallel production. An evaluation of an operation with International Organic Standards may require substantial separation of organic and conventional operations and finances to ensure compliance with the exceptions to the prohibition of parallel production.*

3. Material application records must clearly distinguish material applications made to international organic sites and material applications made to US organic, transitional, and/or conventional sites.
4. Farming operations must maintain harvest records that clearly indicate yields from international organic sites and yields from US organic, transitional, and/or conventional sites.
5. Farming operations must maintain sales records that clearly distinguish and separate sales of international organic and sales of US organic, transitional, and/or conventional crops. The volume of products sold must correspond to the volume of products harvested.
6. Inspections will cover the entire agricultural production system being managed by an operation, even if only part of the operation is included in the certification application. Inspections by WSDA may therefore include observations of the nonorganic land, harvesting, and storage areas.
7. Materials used in organic production must not be stored in the same area as materials used in conventional production.
8. The production system must not rely upon continuous switching between organic and non-organic management.



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### E. CROP PRODUCTION STANDARDS

1. Soil pasteurization (sterilizing soil with steam) is prohibited.
2. Plastic mulches or other synthetic row covers must be made from products based on polyethylene, polypropylene, or other polycarbonates. Polyvinyl chloride products are prohibited. Synthetic row covers must be removed from the soil when no longer in use. Synthetic row covers may not be burned on farmland.
3. Producers must use organically grown seeds, annual seedlings, and planting stock. If appropriate organic varieties are not available, untreated non-organically grown seeds may be used for a limited time upon approval by WSDA. WSDA has the authority to determine if equivalent organic varieties are available and thus require their use.
4. Annual seed and planting stock must be propagated under organic management one generation before being certified under the WSDA International Program as an organic seed and plant material. Perennial planting stock must be under organic management for two growing periods before being certified under the WSDA International Program as organic plant material.
5. Buffer zones, when necessary or required by WSDA, must be at least 25 feet (8m) wide or wider depending on the risk and nature of potential contamination. Permanent hedgerows, plant windbreaks, artificial windbreaks, permanent roads, or other features may be used instead of buffer zones.
6. Sprout Production – seed, or growing sprouts, may not be rinsed or immersed in water with chemicals capable of releasing chlorine in solution, in excess of water quality guidelines.

### F. CROP PRODUCTION AND POST HARVEST HANDLING MATERIALS

In addition to materials prohibited under the US National Organic Standards the following active ingredients are **prohibited** as crop production materials under the WSDA International Organic Program.

#### 1. Prohibited Crop Production Materials

**Use of a prohibited material will result in the loss of a site's certification for 36 months.**

##### European Union

- a. Chilean nitrate (sodium nitrate)
- b. Vitamin D-3 for rodent control
- c. Sulfur dioxide for rodent control
- d. Vitamins B<sub>1</sub>, C, E
- e. Gibberellic Acid
- f. Antibiotics (streptomycin, terramycin)
- g. Hydrogen peroxide
- h. Ammonium soaps
- i. Boric acid for structural pest control
- j. Hydrated lime for disease control
- k. Peat for soil conditioning
- l. Ammonium carbonate

##### Canada

- a. Chilean nitrate (sodium nitrate)
- b. Antibiotics (streptomycin, terramycin)

**\*\*Note that a site may comply with both Canada and European Union standards in regards to production materials, OR a site may comply with Canada standards only. The organic certification of a site will specify the applicable standards that have been met.**

#### 2. Restricted Crop Production Materials

- a. Raw, composted, and processed manure.
  - i. Manure from an organic operation must be sourced first.
  - ii. When manure from organic operations is not available in sufficient quantities, nonorganic manure may be used with international organic crops under the following conditions:
    - Manure may not be from caged poultry operations
    - Manure sources must test annually for heavy metals and pesticide residues and meet the standards outlined on Page 5.



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iii. All manure sources, attempts to source organic manure, and applicable test results must be documented and this documentation must be available during an inspection.

The following testing standards must be met for manure products used on international organic sites:

	Analytes	Accepted Test Methods	Standard																				
<b>Pathogens (composted and processed manure only)</b>	Fecal coliform, salmonella	No specific requirements if performed at an independent laboratory	May not contain more than 1x10 <sup>3</sup> (1,000) MPN (Most Probable Number) fecal coliform per gram and not contain more than 3 MPN Salmonella per 4 gram sample																				
<b>Metal testing (raw, composted, and processed manure)</b>	Arsenic, Cadmium, Cobalt, Mercury, Molybdenum, Nickel, Lead, Selenium, Zinc	As given in Chapter 16-200 WAC	As given in Chapter 173-350-220 WAC:  <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: left;">Metal</th> <th style="text-align: left;">Limit (mg/kg dry weight)</th> </tr> </thead> <tbody> <tr><td>Arsenic</td><td>&lt; = 20 ppm</td></tr> <tr><td>Cadmium</td><td>&lt; = 10 ppm</td></tr> <tr><td>Copper</td><td>&lt; = 750 ppm</td></tr> <tr><td>Lead</td><td>&lt; = 150 ppm</td></tr> <tr><td>Mercury</td><td>&lt; = 8 ppm</td></tr> <tr><td>Molybdenum</td><td>&lt; = 9 ppm</td></tr> <tr><td>Nickel</td><td>&lt; = 210 ppm</td></tr> <tr><td>Selenium</td><td>&lt; = 18 ppm</td></tr> <tr><td>Zinc</td><td>&lt; = 1400 ppm</td></tr> </tbody> </table>	Metal	Limit (mg/kg dry weight)	Arsenic	< = 20 ppm	Cadmium	< = 10 ppm	Copper	< = 750 ppm	Lead	< = 150 ppm	Mercury	< = 8 ppm	Molybdenum	< = 9 ppm	Nickel	< = 210 ppm	Selenium	< = 18 ppm	Zinc	< = 1400 ppm
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Nickel	< = 210 ppm																						
Selenium	< = 18 ppm																						
Zinc	< = 1400 ppm																						
<b>Pesticides (raw, composted, and processed manure)</b>	Broad spectrum of organochlorines and organophosphates	EPA Test Methods 8081, 8081A, 8141, 8141B. Other test methods may be allowed with prior approval.	Must be below FDA Action Level or below 5% of the EPA Tolerance level																				

**NOTE** – Manure products that have been registered through the WSDA Organic Material Registration Program *and* have received approval as compliant with European Union and Canadian organic standards, have met the above testing standards.

b. Mineral Fertilizers. Mineral fertilizers may only be used as a supplement to other practices implemented to ensure long-term fertility needs. These other practices include techniques such as organic matter additions, green manures, rotations, and nitrogen fixation by plants.

### 3. Prohibited Post Harvest Handling Materials

- b. Sodium sulphate, and lignin sulfonate for floating tree fruit
- c. Chlorine materials for direct food contact (including, but not limited to calcium hypochlorite, chlorine dioxide, and sodium hypochlorite)
- d. Other direct food contact sanitizers: peracetic acid, ozone, hydrogen peroxide

## G. NATURAL RESOURCE AND BIOLOGICAL DIVERSITY CONSERVATION

1. Clearance of primary ecosystems for establishment of organic food production is prohibited.
2. Operators must have a plan in place to enhance biodiversity. Biological diversity shall be established, maintained and promoted through the use of various practices which may include, but are not limited to:



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- Establishment or preservation of non-agricultural areas, such as hedgerows, native prairies, wetlands and woodlands, adjacent to or adjoining the field or farm parcel;
  - The planting of species, adjacent to or between cropped areas, that provide habitat for beneficial organisms;
  - The use of rotational or intensive grazing methods on areas maintained as pasture, grazing land or farm lot areas;
  - Introduction of diverse species into any field or farm parcel planted with a perennial crop;
  - Cover cropping; and
  - Soil building practices.
3. Efforts must be made to conserve water and to ensure that farming practices do not degrade water quality.
4. Crop production practices shall return nutrients, organic matter, and other resources removed from the soils through harvesting by the recycling, regeneration and addition of organic materials and nutrients.

### H. GENETICALLY MODIFIED ORGANISMS

1. Genetically modified organisms may not be produced on the conventional landholdings owned by an operator of a farming operation certified to International Organic Program standards.
- a. The following crops currently have commercially available genetically modified varieties that are sold in the United States:

i. Canola/Rape Seed	vii. Flax	xiii. Cherry Tomato
ii. Chicory	viii. Papaya	xiv. Tomato
iii. Corn	ix. Potato	xv. Rice
iv. Sweet Corn	x. Soybean	xvi. Alfalfa
v. Popcom	xi. Squash	
vi. Cotton	xii. Sugarbeet	
  - b. Producers with the above conventional crops must have documentation verifying non-GMO varieties were planted.
2. Producers must have a plan in place to prevent contamination of organic crops by pollen drift from genetically modified crops and crop varieties. Crops contaminated by GMOs are not eligible for international organic certification.
3. The deliberate use, or negligent introduction, of genetically modified organisms or their derivatives (traced back one step in biological chain) to organic farming systems or products is prohibited. This shall include animals, seed, propagation material, pollen and farm inputs such as fertilizers, soil conditioners, or other crop production materials.
4. Contamination by GMOs may alter the organic status of an operation, even if circumstances are beyond the control of the operator.

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### I. WILD HARVESTED CROPS – Refer to *PRO-OFP-165* for additional information on *Organic Wild Harvest Certification*.

1. Persons who desire to obtain organic certification for any wild harvested crop must submit an application and pay the prescribed fees to the department on an annual basis as described under Chapter 16-157 WAC. This application must include:
- a. Applicants for wild harvest crops organic certification shall complete the basic organic producer application forms and certification criteria.
  - b. A sworn statement of intent from the wild harvester that they will harvest the wild harvest crop in a sustainable way. This statement will verify that:
    - No prohibited materials have been applied to the land within the last three years.
    - Adequate buffer zones will be established to prevent the contamination of the wild harvested crops from conventional farming or other sources of contamination.
    - Wild harvested crops will be harvested in such a way as to not jeopardize the long-term viability of the crop in the wild. A full map of the areas to be harvested defining boundaries, borders, buffer zones, and crops to be harvested.
  - c. A Wild Harvest Organic Plan that will:
    - Describe the natural environment of the harvest area,



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- List any endangered plants or animals that occur in the harvest area,
  - Describe the practices and procedures involved in the management and harvest of the crop,
  - Written procedures for all collectors that ensures that the crops are harvested sustainably and in a manner that does not damage the environment,
  - Describe the recordkeeping system that, at a minimum, records all collectors, harvest dates, and quantity of wild harvest crops harvested.
  - Describe the monitoring system that will be used to ensure that the crop is harvested in a sustainable manner that does not damage the environment, including soil and water quality,
  - Include procedures to prevent contamination from adjoining land use or other sources of contamination.
2. The crops to be harvested must comply with the USDA National Organic Standards (Section 205.207), European Union Organic Regulations, and IFOAM Basic Standards.
  3. In the case of public lands, the manager of those lands shall sign a statement that no prohibited materials, as defined by the US National Organic Standards, and WSDA International Program, have been applied to the land for at least three years prior to harvest.
  4. In the case of private lands, the owner of those lands shall sign a statement that no prohibited materials, as defined by the US National Organic Standards, and WSDA International Program, have been applied to the land for at least three years prior to harvest.
  5. The collectors must sign statements that they will harvest the crops in a sustainable manner that does not damage the environment or the long-term viability of the crop in the wild.
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### J. SOCIAL JUSTICE

1. Farm operations employing ten or more persons must maintain a written policy on farm labor that addresses the requirements of this section.
  2. An operation that complies with all State and Federal labor laws within the United States will be considered in compliance with this section. These laws include, but are not limited to:
    - The National Labor Relations Act
    - Fair Labor Standards Act
    - Child Labor Rules
    - Washington State Minimum Wage
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### K. COMPLAINT LOG

1. All operations must keep a record of all complaints received that relate to a product's compliance with these requirements. These records must be made available during an inspection and must demonstrate that appropriate action is taken with respect to each complaint received.
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### L. INTERNATIONAL LOGO

1. Products certified in accordance with these requirements may use the following logo (page 8) on labels and marketing information related to the approved products.
2. WSDA Organic Food Program staff must approve the use of the International Logo on labels, packaging, and marketing information *prior* to distribution of the package or information into the marketplace.



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### JAPAN ORGANIC COMPLIANCE PROGRAM

On March 27, 2002, the United States Department of Agriculture (USDA) announced that the Japanese Ministry of Agriculture, Food and Fisheries (MAFF) has determined that USDA's National Organic Standards meet the requirements of the Japanese Agricultural Standards (JAS). This official recognition means that bulk plant-based agricultural products from United States' certified operations may be labeled or represented in Japan as organic. The recognition arrangement does stipulate, however, that certain materials may not be used in raw or processed organic food exported to Japan. Although these substances are allowed under the U.S. organic standards, confirmation that the materials have not been applied to the product must be obtained prior to the shipping of products to Japan.

The export arrangement with MAFF requires the Accredited Certification Agencies, such as WSDA, to issue an export certificate (TM-11) for each shipment of organic product entering Japan that does not contain the JAS logo - *Please contact our office for details on the JAS Inspection Program if you wish to export retail organic products to Japan.* WSDA is unable to sign off on a USDA Export Certificate that contains product that has not been produced and handled according to Japan requirements. In order to meet the requirements of the USDA and MAFF export arrangement, and have the ability to export bulk crops or products to Japan, the following additional requirements must be met. Details of the USDA and Japan Export Arrangement can be found on the National Organic Program website: <http://www.ams.usda.gov/NOP/NOP/TradeIssues/Japan.html>

#### A. SCOPE

1. Evaluation of compliance with the USDA and Japan Export Arrangement is on a crop variety basis. Compliance is not evaluated on a site-by-site basis.

#### B. MATERIALS

1. In addition to materials prohibited under the US National Organic Standards, the following materials are **prohibited** under the WSDA Japan Compliance Program. **Use of a prohibited material during crop production or post harvest handling and processing will result in the inability to export your organic crops or products to Japan for that crop year.**
  - a. Potassium bicarbonate
  - b. Lignin sulfonate
  - c. Alkali extracted humic acids

**Note:** If interested in obtaining Japan Compliance **ONLY**, and not certification in accordance with the European Union and Canada, you are not required to apply to the International Organic Program.

The fee for an evaluation for the Japan Compliance Program only is \$40. Contact our office to learn about this process.

