

Most Common Mistakes Made by Certified Crop Operators and/or Certification Applicants

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Certifier relations:

- Getting a product or practice approved by a certifier, but not getting the approval in writing, and then misunderstanding the “approval.”
- Failure to submit requested documentation to the certifier (such as prior land-use forms, non-GMO letters, adjoining land-use forms, water test results, etc.).
- Not understanding and/or not complying with certification requirements (minor non-compliances) from the previous year.
- Failure to complete required paperwork on time, or at all.
- Not registering with the state organic program, if applicable.
- Failure to pay certification and/or inspection fees.

Non-approved inputs:

- Use of non-approved substances (including treated seeds), due to negligence and/or not understanding the requirements.
- Use of non-approved substances, due to trusting an input supplier who gave assurances that the material was approved for organic farming.
- Failure to inquire about the GMO status of inputs, especially inoculants and Bt products.
- Not having documentation of non-GMO status of inputs, including seeds, inoculants, and Bt products.
- Incorrectly calculating the length of time from the last date of prohibited inputs used—and the required 36 months have not passed. The farmer then wrongly thinks that the present year’s crop will be saleable as certified organic, when it is not certifiable.

Documentation of approved inputs:

- Failure to obtain adequate documentation for purchase of approved inputs.
- Failure to document attempts to purchase organic seeds.

Record keeping:

- Lack of adequate detail or clarity on field maps and/or use of inaccurate maps.
- Field maps that do not show acres, field numbers, and/or adjoining land uses.
- Not keeping field activity records up to date.

- Failure to keep seed and input labels and receipts in an organized and accessible manner.
- Failing to keep records for contracted services, such as planting, spraying, harvesting, and/or trucking.
- Failure to keep bin records up to date.
- Not recording field numbers on harvest and/or storage records.
- Not using lot numbers or not using a consistent lot numbering system.
- Not providing adequate documentation to buyers when organic products are sold.
- Not keeping records of steps taken to inspect and clean transport units.
- Not maintaining adequate records for operations with both organic and conventional production.

Organic plan:

- Failure to follow the operation's organic plan.
- Filing "renewal" farm plans with entries marked "No Change," when there have been significant changes, such as new leased or purchased fields, discontinued leases, sub-divided fields, new crops, new inputs, changes to field numbers, changes to the lot numbering system, etc.

Commingling and contamination:

- Failure to properly clean harvesting equipment and/or storage units, resulting in commingling or contamination of organic crops.
- Failure to segregate crops harvested from buffer zones.
- Lack of cleaning logs for spray equipment that is also used for prohibited inputs
- Work area contamination for post harvest handling (e.g., washing vegetables, cutting vegetables, packing vegetables, etc.).
- Mislabeling or mishandling of crops by workers who are not fully informed of organic certification requirements.
- Misapplication of prohibited materials by workers who are not fully informed of organic certification requirements.
- No GMO drift management plan—not knowing where the nearest GMO fields are located.
- Failure to inform highway departments and/or other authorities that land adjacent to organic fields should not be sprayed (or sign no-spray agreements when these are available).
- Failure to post no-spray signs when and where these would add protection.

**Based on information provided by members of the Independent Organic Inspectors Association and the OTA's Organic Certifiers Council. Compiled January 18, 2002, by James A. Riddle, Organic Independents, Winona, MN, USA.*