



Materials Guidance for Producers

Organic farmers must only use materials that comply with the USDA's regulations for organic production and handling (*7 CFR Part 205, the National Organic Program; Final Rule*). This includes all inputs used on a farm to produce organic crops: fertilizers, mulches, seeds and planting stock, pesticides, livestock health materials, feed additives, etc. It is the farmer's responsibility to evaluate and choose materials and products that are compliant with the rule. When in doubt, certified farmers should call their certification agent.

§205.206 of the USDA's regulations for organic production and handling (*7 CFR Part 205, the National Organic Program; Final Rule*) outlines the requirements for crop pest, weed, and disease control for certified organic production. Like other sections of the Rule, this section forms a "hierarchy". Practices listed in part (a) (management practices) **MUST** be used to control pests and disease, to include sanitation, crop rotation, and site-specific cultural practices. Parts (b), (c), and (d) give specific mechanical and physical methods that **MAY** be used for the control of pests, weeds, and disease problems, respectively. It is not until part (e) of section 206 where the regulations allow for the use of compliant materials / "materials consistent with the national list" to control pest, weed, and disease problems. Applicants should refer to NJDA Guidance on Crop Pest, Weed, and Disease Management for additional information on using materials correctly for problems or emergent situations.

What does the federal organic regulation say about materials?

Copies of the Rule are provided to all certification applicants, and you should read it and refer to it regularly. Generally, the Rule allows the use of natural materials and prohibits synthetic materials. *Exceptions* to this basic principle (allowed synthetics and prohibited naturals) are specifically listed in the part of the regulation called "the National List", found at §§205.600-607. Materials are also discussed in other sections of the Rule, such as §205.105, which prohibits sludge, ionizing radiation, and genetically modified organisms, and §205.203 which defines compost and restrictions on the use of manure.

How does NJDA evaluate the materials I use?

The National Organic Program Final Rule (as amended) is used to determine whether and how a material can be used on an organic farm. As a certified operation you must demonstrate that both the specific material, and the way it is used comply with the Rule. The information you provide in your Organic Farm Plan, Annual Updates, Yearly Materials Logs and other forms, as well as the findings during your annual organic inspection are part of our evaluation process.

How can I tell if a specific, brand name material is allowed in organic production?

The Rule determines whether and how a material can be used in organic production. However, the Rule is general, it mentions only a few materials specifically, and includes no brand names. Individual products, especially pesticides, often do not list all ingredients (inert ingredients are usually not identified on the label or on MSDS). Labels do not typically list the source of ingredients, which can also affect acceptability. These and other reasons make it difficult for individuals to make informed, correct decisions, especially for proprietary products.

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The Organic Materials Review Institute (OMRI) is an organization that was created specifically to evaluate materials to be used in organic systems. Other third-party organic materials review programs exist, often in tandem with accredited certification agents. Lists generated by these third party review organizations can be a very valuable tool to aid organic growers and food processors in making correct, informed decisions. If a material is listed in the OMRI listings as allowed, NJDA organic clients do not have to supply additional compliance information. Applicants and certified operations should check with the NJDA Organic Certification Program to determine which other third party review lists would be acceptable.

The OMRI Generic List contains a listing of many different types of materials one could consider using for crop production, livestock production, and food processing, and discloses whether the material is allowed, allowed with restrictions, or prohibited for use per the Rule. The OMRI Brand Name Products List discloses which exact brand name materials have been reviewed and found to be compliant with the Rule. Every NJDA certified party is provided with the current OMRI lists to aid in making informed materials choices; however, it is best to use the OMRI list on-line to ensure a product has not been removed from the list since last printing.

The Environmental Protection Agency (EPA) also reviews organic pesticide materials for compliance with the Rule, and allows the EPA "For Organic Production" label (see below) to be used on compliant pesticides. The EPA only reviews formulations for registered pesticides (pesticides that by law must be registered with the EPA). Pesticides that are not registered (those that do not contain an EPA Registration Number, e.g. "EPA Reg. No. 1234-56", but have active and inert ingredients on the label) are usually not reviewed by the EPA. These non-EPA registered "pesticides" could potentially contain prohibited materials, even if the product bears the EPA "For Organic Production" logo. If the only documentation you can find to prove a material is compliant is the EPA logo on the label or in advertising, you may wish to call the Supervisor for help in determining if this formulation was actually reviewed by the EPA. In other words, do not rely solely on the EPA "For Organic Production" symbol when making materials decisions.

It is important to understand that OMRI and other review programs are voluntary programs, and not every generic or brand name material that is compliant with the Rule is reviewed and listed by these organizations.

Materials reviews by OMRI and other NJDA recognized third party reviewers are performed by competent authorities who have access to complete information about the material. You may use materials that are not reviewed by OMRI, but you must be able to provide enough information about the material for compliance evaluation. This includes ALL ingredient and manufacturing details. Claims of organic status made by product manufacturers, or product approval by other certification agencies are subject to verification and review by the NJDA. If you use a material that is noncompliant, the certification status of effected production areas, and/or the entire operation may be seriously affected. ***You are strongly urged to have materials not already approved by OMRI or EPA reviewed by NJDA prior to use in your organic production areas.***

EPA-approved label:



OMRI-approved label (optional):

