



MOSES ORGANIC FACT SHEET

Organic Tree Fruit Certification

Whether you are transitioning a currently bearing orchard, planting a new one or renovating an old orchard, there are similar issues you will need to address in order to grow and market organic tree fruit. Organic orchard production is more than just substituting non-approved synthetic inputs, such as pesticides and fertilizers, for approved ones. Organic management promotes soil and crop health to lessen pest and disease problems by using the tools and complexity of nature through cultural, biological and physical activities as well as a few approved synthetic and many natural products.

Organic certification opens up new marketing opportunities for growers who use organic management. Consumer demand for tree fruit that is organically certified and locally grown is on the rise. In the Midwest, many small growers use organic management practices but for various reasons are not yet USDA certified “organic.” The process can seem intimidating at first but there are many resources available to help growers make the transition. Whether or not you are already using organic management, this fact sheet will clarify basic requirements and answer key questions about the certification process.¹

1. For more information on the organic certification process, see the MOSES Guidebook to Organic Certification as well as MOSES fact sheets: The Organic Certification Process and How to Choose a Certification Agency (at www.mosesorganic.org or call 715-778-5775).

Organic Certification

If you plan to sell more than \$5,000 per year in organically labeled products, you must go through the organic certification process. This process starts with the completion of an organic certification application for your certification agency, (known as the “organic system plan”), which is assessed for your compliance with the National Organic Standard. If your application is complete, an on-site inspection will be performed. The certification agency will make a ruling on if you are eligible to sell organic fruit. The application, inspection and review are an annual process.

If you sell less than \$5,000 of organic product annually, you may be exempt from the full certification process, but you must still comply with all of the organic regulations, including maintaining documentation of your activities and inputs. However, if you intend to sell your crop to someone else who will process it into an organic product (like jellies or juice), then you are required to be certified. The under \$5,000 exemption is reserved for direct-to-consumer sales of product that you grow and process yourself only. If your production and processing are part of one operation, then the \$5,000 limit in annual sales applies for both products. If the growing and processing are parts of different businesses, then the certification exemption may apply for each operation separately. Your certification agency can help you understand the rule for your specific situation. Each certification agency has different fee schedules but typically, if your sales are under \$40,000 per year, certification will cost approximately \$600-700

OTFAinfo@gmail.com • <http://www.mosesorganic.org/treefruit/intro.htm>

The Organic Tree Fruit Association (OTFA) is a non-profit membership organization dedicated to serving the interests of organic tree fruit growers and advancing the organic tree fruit industry through education, research and advocacy.

per year. If your sales are between \$15,000 and \$70,000 annually, the fees would approximate \$1,000 per year. The cost of organic certification can be reimbursed to you by your state department of agriculture, at the rate of \$750 or $\frac{3}{4}$ of the cost per year, whichever is less.

Documentation is an important aspect of organic farming. During the transition years a record keeping system should be developed to suit your operation. Small pocket calendars, spiral notebooks and computer systems can be used to note field activities, inputs, storage and sales information, which will be needed once the farm is certified for organic. These records are a valuable historical reference, detailing your farm's unique growing conditions, and will aid you in making yearly management decisions.

Planting Stock and Seeds

If planting a new orchard you are required to try to buy organic tree stock, rootstock, scion wood, and organic seeds for any planting of the understory. If you plant organic nursery stock, and you get a crop within 12 months, you can sell that first fruit harvest as organic if your orchard floor has been free of prohibited products for 36 months prior to the harvest. Alternatively, you are allowed to buy nonorganic trees, rootstock or scion wood (which have not been treated with prohibited synthetic materials), and manage them for 12 months on organically managed land. You can sell a crop of organic fruit from this planting as long as the harvest is at least 36 months from the last application of a prohibited substance.²

You must document all materials applied to the land and trees for at least 36 months prior to the harvest of organic fruit. If you are transitioning an existing orchard, or planting a new orchard into a previously non-organic field, you must write the last date of prohibited substance application in your organic certification application. If you are renovating the understory with grasses or legumes these seeds cannot be treated with synthetic substances, nor be genetically modified (GMO)



or have been inoculated with genetically modified bacteria. Once you are certified organic, you must plant organic seeds unless you can prove you cannot find them in the type, quantity or quality you seek. You are not mandated to plant organic seeds during your transition years, however, use of organic seeds is a good way to make sure the seeds are not GMO, nor treated with something prohibited. If you accidentally plant something not allowed you must start the organic transition again from the day of planting, and your first organic harvest will be delayed until 36 months after the prohibited product use.

If you wish to produce both organic and nonorganic fruit on the same farm this "parallel" production will require you to maintain strict separation of the crops, including dedicated equipment for each type of production as well as no comingling of the organic and nonorganic during production, harvest, storage or sales. Documentation must be maintained describing your protocols and activities to keep the organic from being contaminated by nonorganically approved inputs and equipment or nonorganic fruit.

Soil Fertility

Organic farming is a proactive management system based on ecologically sound practices in concert with the use of approved inputs. Soil fertility is approached not only to feed the current year's crop, but also to continuously build organic matter and improve soil tilth through the use of green manure plowdowns, animal manures, plant materials, mined minerals, and compost. The healthier the tree, the less attractive to pests and the more

2. See the MOSES fact sheet Planning the Organic Orchard to help you develop a good foundation for future organic fruit production.

resilient it is to survive pest or disease outbreaks. Organic management activities in an orchard typically offer numerous benefits. For example, a planting of clover fixes nitrogen, improving soil fertility, while also choking out unwanted weeds. Clover flowers also attract beneficial insects who work to keep problem insects at a tolerable level. Understory weed control may be accomplished by mulching or mowing instead of using synthetic herbicides. The mulch or decayed clippings offer the added benefit of contributing organic matter, improving the soil's water holding capacity.

Soil fertility, and ultimately tree health and fruit quality, will be improved through the use of manure. However, in organic systems manure must be managed very carefully. Manure may be turned into compost, which if prepared according to strict guidelines, is very versatile and highly beneficial. All animal waste-based inputs except vermicompost (worm castings) are considered raw manure unless they have clear documentation that they meet the compost regulation. Even manures that have sat in a pile for many years and do not have an odor must be handled as raw manure. Raw manure cannot be used on or in the soil any sooner than 120 days before harvest of the crop where soil particles may be in contact with the crop. If manure is applied less than 120 days before harvest, fruit that could have been splashed by irrigation or rain water from manure on the ground cannot be sold as organic. True NOP-compliant compost or processed manure can be applied to the crop up until the day of harvest.

Pest and Disease Management

The organic regulation mandates that a specific pest control hierarchy be used. To manage pests and diseases, you must start with cultural controls (i.e. planting resistant stock), mechanical controls (i.e. screening or netting) or biological controls (i.e. the use of beneficial insects and pheromone disruption). If these methods don't work, document the fact and then natural products can be used. If natural inputs are not effective, then approved synthetics can be used.

Organic tree fruit management is one of the most difficult types of organic farming, due to the many



Organic tree fruit management is one of the most difficult types of organic farming, due to the many devastating pests and diseases that are present.

devastating pests and diseases that are present, especially in the humid upper Midwest and Northeast U.S. Choosing disease resistant rootstock, planting trees in a pattern where good airflow can lessen fungal problems, and planting beneficial insect habitat are all examples of a systems-based approach mandated by the organic regulation. This challenges organic orchardists to continually improve their ecosystems. Monitoring throughout the season enables the orchardist to anticipate problems and be prepared to apply approved materials before problems become crises. Trees under stress are more susceptible to pest and insect damage. Providing an environment with a healthy ecosystem will help trees withstand challenging climatic conditions such as drought or excessive rain, and will lessen the need for inputs. Preventative practices such as removing apples from the base of the trees before winter, to prevent overwintering of pests, and keeping grass short to lessen rodent damage, are all part of organic orchard management.³

Production Inputs

Prohibited substances are all synthetic materials that have not specifically been reviewed and approved for use in organic production, as well as a few natural products that have been specifically not allowed. In other words, most synthetic mate-

3. An excellent publication listing the various pests and diseases and their organic management strategies was published by Cornell University Cooperative Extension, A Grower's Guide to Organic Apples, NYS IPM publication No. 223, http://www.nysipm.cornell.edu/organic_guide



If you are under \$5,000 in sales and not certified as organic, you may label your product as organic, but cannot use the USDA organic seal on your label for processed products.

rials are prohibited and most natural inputs are allowed, unless they appear on the organic National List, which can be found on the National Organic Program (NOP) website (<http://www.ams.usda.gov/AMSv1.0/nop>). Brand name products do not appear on this list, only single ingredient generic names. For approved brand name products, you can look on the Organic Materials Review Institute website (www.omri.org), or ask a certification agency if they have reviewed and approved a specific product you are considering using. Do not trust product advertising that claims the product is “organic,” there are products targeted to home gardeners that are misleading in their package claims, and use of them could negatively affect your organic certification status. Once you have started the organic certification process, you can ask your agency to review seeds, seed treatments, pest, disease and fertility inputs for acceptability in your organic management. If you are still a few years from organic certification, call MOSES (888-551-4769 or 715-778-5775) and we will do our best to determine if the product is allowed before you use it. Remember, it is not only the active ingredients that must be acceptable in a material used in your organic orchard, but also all inert ingredients, flowing agents, and any other ingredients. As of the writing of this fact sheet in spring 2010, both tetracycline and streptomycin are approved to control fire blight. Before using these products, verify with a certification agency or MOSES that they are still approved. There are

many helpful amendments and products that are allowed in organic orchard production, including kaolin clay, lime sulfur, horticultural oils, and synthetic pheromones.

Treated wood posts used as orchard perimeter fencing or as buttressing for young trees can remain in place if they were placed there before your first organic inspection. After this, any replacements or new installations in contact with organic soil cannot be made from treated wood. If a treated wood perimeter fence is further out than the drip line of your mature trees, it is probably allowed, but check with your certification agency before using any type of treated wood to be sure.

Post Harvest Handling, Value Added, Sales Handling, washing, and storage of organic fruit must also meet organic requirements, including the use of only approved sanitizer materials in wash water and on food contact surfaces. Pest control products (such as rodent controls) in the production and storage areas are also regulated. Approved products for use may be found on the National List, or you can contact your certification agency or MOSES for more information. As an example, carnauba wax is allowed for use on organic fruit. If you make cider or other value added products, review the labeling requirements in the NOP regulations to make sure you are meeting all requirements. If you are under \$5,000 in sales and not certified as organic, you may label your product as organic but cannot use the USDA organic seal on your label for processed products.

MIDWEST ORGANIC
& Sustainable Education Service
MOSES

PO Box 339 • Spring Valley, Wisconsin 54767
715-778-5775 • info@mosesorganic.org

To find more resources and tools, including our Organic Resource Directory and Organic Broadcaster Newspaper, visit MOSES online at www.mosesorganic.org. Plan to attend our annual Organic Farming Conference in February. For upcoming events, including MOSES trainings and field days, go to our online event calendar at www.mosesorganic.org/events.html.

-updated June 2010