



Organic Policy Statement Required Notification of OSP Changes

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REQUIREMENTS FOR OPERATIONS THAT MAKE CHANGES THAT MAY AFFECT
THEIR ABILITY TO COMPLY WITH THE ACT AND RULES.

**Pertinent NOP rule sections: § 205.400
General Requirements for Certifications.
; § 205.201 Organic production and
handling system plan.**

One of the fundamental requirements for organic certification is that a producer/processor must establish, implement, and update annually an organic production or handling system plan (OSP) that is submitted to an accredited certifying agent. Once the OSP is accepted and agreed to by the accredited certifying agent, in this case the Colorado Department of Agriculture (CDA), CDA is required to conduct an annual inspection for each year the producer/processor requests certification. CDA may conduct additional inspections if it is determined that they are needed to establish compliance with the National Organic Program rules.

While the annual update is required of the overall OSP, any person seeking to maintain organic certification under the regulations in this part must immediately notify the certifying agent concerning any change in a certified operation or any portion of a certified operation or OSP that may affect its compliance with the Act and the regulations in this part. Certified operations regularly fail to notify the certifying agent of these types of changes.

An example of a change that must be immediately reported to CDA include a processor moving their facility to a different location. While the processor may feel their procedures in producing their product have not

changed as a result of moving to the new facility, several items have changed. If a facility is being moved, CDA should be notified prior to the move so that an inspection can be conducted prior to starting operations at the new facility to prevent putting your certification in jeopardy.

Other examples of changes that require immediate notification of CDA for processors include:

- Starting a new processing line which includes different procedures and/or products;
- Changes in ingredients for products;
- Changes in suppliers of ingredients or processing aids;
- Changes in sanitation practices and products; and
- Changes in pest management practices, especially if a synthetic substance not on the National List needs to be used to provide an acceptable level of pest control because the processor and CDA must agree on the substance, method of application, and measures to be taken to prevent contact of the organically produced products or ingredients with the substance used.

Examples of changes that require immediate notification of CDA for crop production include:

- Changes in fertility or pest control products.
- Adding or deleting acreage

- Significant changes in natural resource protection practices such as erosion control and water quality protection practices and
- Changes made to buffers due to changes in land management of neighboring properties.

Examples of changes that require immediate notification of CDA for livestock production include:

- Changes in the types of livestock raised on the operation
- Changes in suppliers of replacement livestock
- Changes in feed rations and/or suppliers; and
- Changes in health care practices and products.

Any notification of CDA that is required pursuant to § 205.400 must be provided in writing. The notification should be sent to:

**Colorado Department of Agriculture
Division of Plant Industry
Organic Program
700 Kipling Street, Suite 4000
Lakewood, Colorado 80215-8000**

Disclaimer: This policy statement is provided as guidance to organic producers/handlers and is not to be used as a substitute for or in place of the National Organic Program rules.