



# Organic Food Federation

## Explanatory Note 319

*These notes are intended to help applicants comply with Organic EC Regulation 2092/91. They are not exhaustive and are for explanation only. In cases of doubt the Regulation or the OFF should be consulted.*

### Exporting to USA?

To export organic products to the USA your production facilities and your products must be certified as fully compliant with the US DEPARTMENT OF AGRICULTURE NATIONAL ORGANIC PROGRAM (NOP) STANDARD.

### Key Features for Producers

#### 1. Conversion

- Agricultural produce must come from land that has had at least 3 years with no prohibited substances applied (*Monitored conversion*). (*Different to EU and OFF standard*)
- Organic Land to have clearly defined buffer zones against conventional fields.

#### 2. Fertility Building:

- Sewage sludge is not permitted. (*Not permitted in EU/OFF either*)
- Raw manures must not be used on crops grown for human consumption within at least 120 days of harvest if the edible part of the plant is in contact with the soil (if not, this is reduced to 90 days before harvest), thereafter properly composted manures must be used.
- Composted plant and animal materials must be produced according to the following or to an equivalently efficient process: initial C/N ratio between 25:1 and 40:1 maintained at 55-77°C of three days (in a vessel/aerated system) or for 15 days turning at least 5 times in a windrow composting system.
- Acceptable and Prohibited inputs shown on Tables attached
- Irradiation, and genetically modified organisms are not permitted. (Not permitted in EU either)

#### 3. Plant protection

- Weeding by means of heat, flame etc is permitted
- Some plant protection agents allowed in EU are not permitted by NOP. See attached table.
- Seeds treated with prohibited substances may not be used except when required to be so by US Federal or State phytosanitary regulations.
- Inputs used as disinfectants on the land or in irrigation systems are restricted. See attached table.

#### 4. Livestock

- Livestock does NOT include aquatic animals and bees. Certification of Honey and fishery products is not possible according to NOP. (*This situation may change, please ask OFF*).

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- Livestock for meat, dairy and egg production must be reared in accordance with humane, hygienic and freedom of movement. Tethering is not permitted (*As in EU/OFF standards*)
- All animals (except chicken) for meat production must be managed organically since at least the last third of gestation or hatching.
- Milking cows must have at least one year under organic management before their milk can be sold as organic. (*In the EU the minimum period under organic management is 9 months*) However certain reductions may be possible if an entire herd is converted Poultry must be under organic management from second day of life onwards.
- Organic Livestock must be fed 100% organic feed. And the feed materials must be NOP compliant (i.e. certified) Livestock bedding must be organic if it is likely to be consumed by the animals.
- No antibiotics are permitted during the whole life cycle. Animals treated with antibiotics cannot be certified to NOP standards.
- Medication is restricted and operators must check with OFF before administration of medicines.

The OFF have produced copies of the NOP Standards annotated to show differences with EU Regulations where appropriate.

- Book 7 General Requirements
- Book 8 Requirements for Producers
- Book 9 Requirements for Processors

All inspections requested by producers and manufacturers wishing to export organic foods to the USA will be audited against these standards, if the same product is to be sold in the EU as well as in the USA the product must comply wholly with NOP Standards and EC Reg 2092/91

**Remember substances which are not specifically permitted are not allowed for use in organic agriculture!**

NOP 205.601 SYNTHETIC SUBSTANCES ALLOWED FOR USE IN ORGANIC CROP PRODUCTION		
SUBSTANCE	CONDITIONS	UK COMPARISON
<b>A) Algicide, Disinfection, Sanitiser (inc Irrigation system cleaning)</b>		
Ethanol		
Isopropanol		
Calcium Hypochlorite	<i>disinfection, sanitising. Must not exceed maximum residues for US drinking water</i>	<i>Not allowed in the UK</i>
Chlorine dioxide	<i>disinfection, sanitising. Must not exceed maximum residues for US drinking water</i>	<i>Not allowed in the UK</i>
Sodium hypochlorite	<i>disinfection, sanitising. Must not exceed maximum residues for US drinking water</i>	
Hydrogen peroxide		
Soap based algicide/demisters		<i>Must be K based soap and used as insecticide</i>

<b>B) Herbicides, Weed Barriers</b>		
Soap based herbicides	<i>farmstead maintenance, roadways, ditches, rights of way, building perimeters etc.</i>	<i>Not allowed in the UK</i>
Newspaper and other recycled papers	<i>without glossy or coloured inks</i>	
Plastic Mulch	<i>petroleum based other than PVC</i>	
<b>C) Compost Feedstocks</b>		
Newspaper and other recycled papers	<i>without glossy or coloured inks</i>	
<b>D) Animal repellents</b>		
Soaps	<i>no contact with soil or edible portion of crop</i>	<i>-In the UK they must be K based soap and used as insecticide</i>
Ammonium	<i>no contact with soil or edible portion of crop</i>	<i>Not allowed in the UK</i>
<b>E) Insecticides (also acarides or mite control)</b>		
Ammonium carbonate	<i>bait only, no contact with soil or edible portion of crop</i>	
Boric acid	<i>structural pest control. Must be no contact with organic food or crops</i>	
Elemental sulphur		
Lime sulphur (including calcium polysulphide)		
Horticultural oils		<i>In the UK plant oils can be used on all crops as an insecticide, acaricide, fungicide and sprout inhibitors. Mineral oils can be used until March 2002 on trees and vines</i>
Soaps		<i>In the UK it must be Fatty acid potassium soap (soft soap)</i>
Sticky traps, barriers		
<b>F) Insect repellents</b>		
Pheromones		
<b>G) Rodenticides</b>		<i>- UK standards allow any rodenticide as long as it is approved for use in the UK</i>
Sulphur Dioxide		
Vitamin D3		
<b>H) Slug or snail bait</b>	<i>none permitted</i>	<i>- UK allowed Metaldehyde with a repellent for higher animal species and the permit for its use expired 31 March 2002</i>
<b>I) Plant Disease Control</b>		
Copper Hydroxide	<i>not for use as herbicide, must be used in a way that minimises copper accumulation in the soil</i>	<i>In the UK the use is restricted to 8kg/ha/yr till 2005 and then reduced to 6kg from them on.</i>
Copper Oxide	<i>not for use as herbicide, must be used in a way that minimises copper</i>	<i>In the UK the use is restricted to 8kg/ha/yr till 2005 and then reduced to 6kg from them on.</i>

	<i>accumulation in the soil</i>	
Copper Oxychloride	<i>not for use as herbicide, must be used in a way that minimises copper accumulation in the soil</i>	<i>In the UK the use is restricted to 8kg/ha/yr till 2005 and then reduced to 6kg from them on.</i>
Copper Sulphate	<i>must be used in a way that minimises copper accumulation in the soil</i>	<i>In the UK the use is restricted to 8kg/ha/yr till 2005 and then reduced to 6kg from them on.</i>
Hydrated Lime	<i>must be used in a way that minimises copper accumulation in the soil</i>	<i>Not allowed in the UK</i>
Hydrogen peroxide		<i>In the UK it can only be allowed to be used as a disinfectant</i>
Lime sulphur		<i>In the UK its use is restricted to fungicide, insecticide and acaricide for winter treatments of fruit trees olive trees and vines</i>
Horticultural oils	<i>narrow range oils as dormant, suffocating and summer oils</i>	<i>In the UK plant oils can be used on all crops as an insecticide, acaricide, fungicide and sprout inhibitors. Mineral oils can be used until March 2002 on trees and vines</i>
Potassium Bicarbonate		<i>-Not allowed in the UK</i>
Elemental sulphur		<i>Allowed to be used in the UK as a fungicide</i>
Streptomycin	<i>for fire blight control in apples and pears only-</i>	<i>Not allowed in the UK</i>
Tetracycline (oxytetracycline calcium complex),	<i>for fire blight control only</i>	<i>Not allowed in the UK</i>
<b>J) Plant or Soil Amendments</b>		
Aquatic Plant extracts	<i>KOH or NaOH extraction using minimum required</i>	<i>In the UK seaweed only is allowed to be used either as a straight product or an extract gained by physical process (including dehydration, freezing and grinding), by extraction with water or aqueous acid and/or alkaline solution or by fermentation</i>
Elemental sulphur		
Humic Acids	<i>naturally occurring deposits, water and alkali extracts only</i>	<i>- Not allowed in the UK</i>
Lignin Sulphonate	<i>chelating agent, dust suppressant, flotation agent</i>	<i>- Not allowed in the UK</i>
Magnesium Sulphate	<i>allowed with a documented soil deficiency</i>	
Micronutrients	<i>not for defoliant, herbicide or desiccant, those made from nitrates or chlorides not allowed soil deficiency to be documented</i>	<i>In the UK they have to be in the forms listed in Directive 89/530/EEC</i>
Soluble boron products		
Trace Minerals Sulphates	<i>of Zinc, Copper, Iron, Manganese, Molybdenum, Selenium and Cobalt</i>	

Carbonates	<i>of Zinc, Copper, Iron, Manganese, Molybdenum, Selenium and Cobalt</i>	
Oxides	<i>of Zinc, Copper, Iron, Manganese, Molybdenum, Selenium and Cobalt</i>	
Silicates	<i>of Zinc, Copper, Iron, Manganese, Molybdenum, Selenium and Cobalt</i>	
Liquid fish products	<i>can be pH adjusted with sulphuric, citric or phosphoric acid not to exceed the minimum required to lower pH to 3.5</i>	<i>In the UK only Fish Meal is allowed</i>
Vitamin B1		<i>Not allowed in the UK</i>
Vitamin C		<i>Not allowed in the UK</i>
Vitamin E		<i>Not allowed in the UK</i>
<b>K) Plant Growth Regulators</b>		
Ethylene	<i>regulation of pineapple flowering</i>	<i>In the UK Ethylene is only allowed to be used to de green bananas</i>
<b>L) Floating Agents for post harvest handling</b>		
Lignin sulphonate		<i>Not allowed in the UK</i>
Sodium silicate	<i>for tree fruit and fibre processing</i>	<i>Not allowed in the UK</i>
<b>M) Synthetic Inert ingredients classified by the EPA for use with non-synthetic substances</b>		
<b>N) EPA List 4 - Inerts of minimal concern</b>		
Ash		
Arsenic		
Lead Salts		
Sodium fluoaluminate (mined)		
Strychnine	<i>also prohibited in livestock production(see 205.604)</i>	
Tobacco Dust (Nicotine sulphate)		
Potassium chloride	<i>unless derived from a mined source and applied in a manner minimising chloride accumulation in the soil</i>	
Sodium Nitrate	<i>unless the use is restricted to not more than 20% of the crops total nitrogen requirement</i>	

**NOP 205.602  
NON-SYNTHETIC SUBSTANCES PROHIBITED FOR USE IN ORGANIC CROP PRODUCTION**

Substance	Conditions	
Ash		
Arsenic		
Lead Salts		

Sodium fluoaluminate (mined)		
Strychnine	<i>also prohibited in livestock production(see 205.604)</i>	
Tobacco Dust (Nicotine sulphate)		
Potassium chloride	<i>unless derived from a mined source and applied in a manner minimising chloride accumulation in the soil</i>	
Sodium Nitrate	<i>unless the use is restricted to not more than 20% of the crops total nitrogen requirement</i>	

<b>NOP 205.603</b>			
<b>SYNTHETIC SUBSTANCES FOR USE WITH ORGANIC LIVESTOCK PRODUCTION</b>			
	Substance	Conditions	
	<b>A) Disinfectant, Sanitiser and medical treatments</b>		
1.1	Ethanol	<i>disinfectant &amp; sanitiser</i>	
1.2	Isopropanol	<i>disinfectant, prohibited as feed additive</i>	
2	Acetyl salicylic acid (asprin)	<i>anti-inflammatory only when required</i>	<i>In the UK its use must be under veterinary instruction.</i>
3	Calcium Hypochlorite	<i>disinfection, sanitising. Must not exceed maximum residues for US drinking water</i>	<i>not allowed in the UK</i>
4.1	Chlorine dioxide	<i>disinfection, sanitising. Must not exceed maximum residues for US drinking water</i>	<i>not allowed in the UK</i>
4.2	Sodium hypochlorite	<i>disinfection, sanitising. Must not exceed maximum residues for US drinking water</i>	
4.3	Chlorohexidine	<i>germicide. For teat dip when other sanitisers have lost their effectiveness</i>	<i>In the UK any product for teat dipping allowed conventionally is allowed</i>
5	Electrolytes	<i>without antibiotic</i>	
6	Glucose		<i>In the UK it can be fed in the form of molasses used as a binding agent in compound feeds.</i>
7	Glycerine	<i>teat dip, must be produced from hydrolysis of oils or fats</i>	<i>In the UK any teat dip allowed conventionally is allowed</i>
8	Iodine		
9	Hydrogen Peroxide		<i>In the UK it is allowed as a disinfectant</i>
10	Magnesium Sulphate		<i>In the UK it is allowed for use in feed</i>
11	Oxytocin	<i>postparturition therapeutic application</i>	<i>Under veterinary advice</i>
12	Ivermectin	<i>Paraciticide, emergency treatment when organic system plan fails to prevent infestation. 90 day withdrawal required after treatment</i>	<i>In the UK internal anthlymintics are only allowed to be used with justification and not as a preventative. For external parasites products are allowed to be used as long as they are</i>

			<i>not multipurpose as in Ivermectin</i>
13	Phosphoric acid	<i>Equipment cleaner only no to be used in contact with organic livestock or land</i>	<i>In the UK it is allowed to be used only as a dairy equipment cleaner.</i>
14	Vaccines	<i>prescribed by vet</i>	<i>– In the UK vaccines are allowed to be used only where there is a known disease risk and where there is a reduction to the lowest number of vaccines in one.</i>
	<b>B) Topical Treatment, External Paraciticide or local anaesthetic</b>		
	Iodine		
	Lidocaine	<i>local anaesthetic 90 day withdrawal for slaughter animals and 7 days for dairy</i>	
	Hydrated Lime	<i>not permitted to cauterise physical alterations or deodorise animal wastes</i>	<i>Not mentioned in UK standards</i>
	Mineral Oil	<i>for topical use and as a lubricant</i>	<i>Not mentioned in UK standards</i>
	Procaine	<i>local anaesthetic 90 day withdrawal for slaughter animals and 7 days for dairy</i>	
	Copper Sulphate		<i>Allowed in feed only in the UK</i>
	<b>C) Feed supplements</b>		
	Milk replacers	<i>without antibiotics and for emergency use only no non-milk or products from BST treated animals.</i>	<i>This can be used in the UK but will render the animal non-organic. What about organic milk replacers ?</i>
	<b>D) Feed Additives</b>		
	Copper Sulphate		<i>- The list of the forms these trace elements can be used in are listed on pages 17-18 in the OFF Livestock standards</i>
	Magnesium sulphate		
	Vitamins	<i>used for enrichment or fortification when FDA approved</i>	<i>Vitamins listed in the EU Directive 70/524/EEC</i>
	<b>E) Synthetic inert ingredients classified by the EPA for use in non-synthetic substances etc.</b>		
	<b>F) EPA List 4 Inerts of Minimal Concern</b>		