

Organic Input Review



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ORGANIC FACT SHEET

Organic Production Inputs

A common question from clients is if a product is allowed for use in organic production. Properly answering these product review questions is critical to document compliance and allows you to use organic production inputs. Product review questions fall under three use categories, crop production inputs, livestock management materials, and inputs used in handler operations.

MOSA approval is required *prior* to use of any new input. Approving products requires the gathering of information needed to verify the product is allowed for its specific use.

National Organic Standards

Published within the standards are several lists that determine the allowed and prohibited materials for organic production. 205.601, 205.603 and 205.605 note the allowed synthetic materials that can be used in crop production, livestock management and processed products, respectively. Although synthetic materials are generally prohibited, some synthetics are allowed because the material cannot be produced from a natural source or there are no organic substitutes. Commonly used allowed synthetics would include micronutrients for crop fertility, vaccines for livestock, and non-GMO dairy cultures for processed cheese.

Lists 205.602 and 205.604 identify prohibited nonsynthetic (natural) substances for crop production and livestock management, respectively. The “natural” substances on these lists pose an unnecessary risk to the environment, animals or consumers. Because of this, the substances cannot be used for organic production. Tobacco dust for crop pest management and strychnine for livestock production would be examples.

Quick Facts

- All organic inputs must be approved before use.
- The National Organic Standards contain lists of allowed and prohibited materials.
- OMRI reviewed and labeled products are approved for organic use.

Finally, 605.606 lists allowed non-organic ingredients to be used in processed organic products. These ingredients are allowed when organic sources are not commercially available. Examples would include intestinal sausage casings or blueberry juice for food pigmentation.

Review Organizations

The USDA recognizes four overarching organizations as having the authority to review inputs for organic production. The most commonly recognized is the Organic Materials Review Institute (OMRI). If you see an OMRI seal on a product, or that product is currently listed on the OMRI website, then that product is approved for organic use in the category they list it in. If you use a OMRI product, be sure that you are meeting their restrictions or annotations.

Use approval can also be determined for products reviewed by the Washington State Department of Agriculture (WSDA), California Department of Food and Agriculture (CDFA) and the Environmental Protection Agency (EPA). However, EPA organic approval is only found for federally reviewed pesticides. If you use products approved by these regulatory agencies, be sure you are following the label instructions and that you are aware of any applicable restrictions or annotations. If you have any doubt, contact our office for clarity.

MOSA Reviewed Products

Many products intended for organic use have not been reviewed by the authorized agencies noted above. In these cases, you must seek MOSA approval prior to using the product. Our products database contains thousands of entries and there is a good chance that we have already reviewed the product. Call or write our office to see if this is the case. When you contact us, be sure to know the complete product name and the manufacturer's contact information. Often products have similar names. Without knowing the specific product name and manufacturer, our office might not be able to identify the product that you want to use.

In some cases, the product that you propose for use will need to be fully reviewed by MOSA prior to use. This can be a time consuming process, but if you gather the required product information, this process can be sped up. The following provides examples (not a complete list) of the needed information for the routine products reviewed:

Crop Fertility Products

Naturally mined minerals are allowed. Examples include limestone, gypsum and rock phosphate. A statement from the manufacturer is required to verify that the mineral is naturally mined with no prohibited additives.

Synthetic micronutrients are allowed if soil/plant deficiency is documented with a test. Exceptions would include ammoniated, chlorinated and nitrate forms. Micronutrients in these forms are prohibited. If micronutrients are in a fertility product, MOSA will need to know chemical formula/name for each single

micronutrient in the product. If inert ingredients are in the product, our office will verify that that each inert ingredient is allowed.

Livestock Feed Supplements

All agricultural ingredients must be certified organic with verification provided. If a product contains agricultural ingredients (wheat midds or rice hulls), the feed ingredients must be certified organic. This is verified by obtaining an active organic certificate.

Association of American Feed Control Officials (AFFCO) single ingredient vitamins and minerals are allowed. Manufacturer verification is required to document the minerals and vitamins are AFFCO listed.

Livestock Health Care Products

Active ingredients must either be a natural ingredient or a synthetic material listed on 205.603. Natural products include non-organic agricultural ingredients, such as neem oil, diatomaceous earth or plant based ingredients.

Excipients (non-active, inert or other ingredients like carriers) are allowed if listed as Generally Regarded as Safe by the Food and Drug Administration.

Processing Products

Natural flavorings are allowed with documentation from the supplier. Synthetic flavoring agents are prohibited. Flavoring that is agriculturally derived must be organic.

The Final Word

Often, product review for crop, livestock and handler materials are relatively quick and simple. At times product review can be time consuming. Some manufacturers are slow to respond and do not always understand what type of information is needed for review. We might not be able to give you a timely answer. Often our office will be able to provide you with a list of alternative products for organic use. Using a product without MOSA approval can put your operation at risk. Before any new product is used in your operation, remember to seek MOSA approval.

V1.0 5-2016 JP