

Transitional Production Plan – Crops

This production plan is for crops producers transitioning to organic as part of the United States Department of Agriculture (USDA) Organic Transition Initiative (OTI) Transition to Organic Partnership Program (TOPP). These transitional producers have an organic system in place, are implementing practices that are expected to lead to compliance with the USDA organic regulations (organic rules), and are not using prohibited substances.

A completed Transitional Production Plan, signed by a USDA accredited certification body (certifier), can be used as organic system plan documentation in consideration for transitional crop insurance ([Organic Crops | RMA \(usda.gov\)](#)) and may meet part of the application requirements for Conservation Activity Plan 138 under the Natural Resource Conservation Services' Environmental Quality Incentives Program's Organic Initiative ([CAP 138](#)).

The [Organic Integrity Database](#) (INTEGRITY), operated by the USDA Agricultural Marketing Service National Organic Program (NOP), is a registry of certified organic and transitional operations, including data provided by certifiers. For a transitional producer to have its operation listed as transitional in INTEGRITY, and be eligible for organic transitional crop insurance, the producer must complete this Transitional Production Plan and have it reviewed/signed by a certifier. This will comply with the [USDA NOP Organic Integrity Database – Transitional Operation Reporting memo](#) issued to certifiers.

Transitional Producers – *complete all pages of this plan; sign this cover page; and submit your completed plan to a certifier for review.*

By signing this plan, I certify that all information is true and correct to the best of my knowledge. I agree to be listed in INTEGRITY as a transitional operation. Transitional operations listed in INTEGRITY will only be viewable by logged-in authorized USDA personnel, TOPP lead partner and certifier users. Listings of transitional operations may also be provided to the Federal Crop Insurance Corporation and their approved insurance providers, for the purpose of evaluating eligibility for transitional crop insurance. Transitional operations will not be view able by the public. Transitional status does not mean that a producer will qualify for organic certification; that requires full compliance with the regulations as assessed by a certifier.

Transitional Producer Signature

Date

USDA-NOP Accredited Certifier – *review this completed plan and sign below.*

I have reviewed this plan according to the criteria contained in the Organic Integrity Database – Transitional Operation Reporting memo issued by USDA-NOP. The review confirms that the reported practices and materials in this transitional producer plan meet the requirements for transition as defined above, and the operation will be listed in INTEGRITY with “Transitional” status.

Signature of Reviewer

Date

Printed Name of Reviewer and Title

Printed Name of Accredited Certifier

Transitional Producer Contact Information

1. Operation Name:

2. Address(es):

Primary Physical Address			
Street Address	City	State	Zip Code

Mailing Address			
Street Address	City	State	Zip Code

Billing Address			
Street Address	City	State	Zip Code

3. Contact Information:

Primary Contact	
First Name	Last Name
Phone Number	Email Address
Relationship to Operations	Preferred Language

Responsibly Connected Contact (if different)	
First Name	Last Name
Phone Number	Email Address
Relationship to Operations	Preferred Language

Additional Authorized Contact (if relevant)	
First Name	Last Name
Phone Number	Email Address
Relationship to Operations	Preferred Language

Land Information and History

NOP § 205.202

Background. Land used to produce crops that will be sold or represented as organic must:

- have had no prohibited substances applied to it for at least 36 consecutive months preceding harvest of the organic crop
- have distinct, defined boundaries and buffer zones to prevent the unintended application of a prohibited substance to the crop or organic land

Instructions: *Transitional producers must identify the land they intend to transition to organic production, disclose the last application of a prohibited substance, and describe steps taken to prevent the unintended application of prohibited substances.*

1. Identify the land transitioning into organic production. This can be physical address, GPS coordinates, county assessor's parcel number, section/township/range, tax map key, FSA identifier, or any other legal description of the land.
 - 1.1. Attach a labeled map or maps of the land transitioning into organic production.
 - 1.2. How many acres of land are transitioning into organic production?
 - 1.3. If you have an existing conservation plan or contract, describe and/or attach it.
 - 1.4. If you have a government pesticide use report, describe and/or attach it.
 - 1.5. Disclose the last prohibited material that was applied to the land transitioning into organic production, and the date of its application. (Refer to the [National List of Allowed and Prohibited Substances](#) and [205.105](#) to determine whether materials are allowed or prohibited.)

Seeds and Planting Stock

NOP § 205.204

Background. With few exceptions, a certified organic producer must use organically grown planting materials - seeds, annual seedlings, and planting stock. These exceptions are:

- non-organic untreated seeds and planting stock may be used when an equivalent organic variety is not commercially available (does not apply to seed for edible sprouts)
- non-organic seeds and planting stock that have been treated with an allowed synthetic substance may be used when an equivalent organic or untreated variety is not commercially available
- non-organic annual seedlings may only be used in the rare case that a temporary variance is granted (applies only to certified operations)
- non-organic planting stock for perennial crops may be represented as organic after it has been maintained under organic management for one year

The organic rules (regulations) also prohibit certain methods used to genetically modify organisms or influence their growth or development by means that are not possible under natural conditions or processes. This means that GMO planting materials may not be used.

Instructions: Transitional producers must show that the planting materials (seed, seedlings, and planting stock) they use are organic or, if not, that they are non-GMO and not treated with a prohibited material. If you have not used and do not plan to use any planting materials during transition to organic, you may mark this section “non-applicable” and skip it. Records must be kept verifying organic and/or untreated status of planting materials.

1. Select all types of planting materials you use or intend to use while transitioning to organic production. This includes on-farm produced seed. If you have not used and do not plan to use any planting materials during transition, skip this section after marking “Section Not Applicable”.

Section Not Applicable

Organic planting materials:

Organic seed Organic planting stock Organic seedlings

Non-organic planting materials:

Non-organic untreated seed Non-organic planting stock Non-organic treated or inoculated seed

2. If you use any non-organic planting materials in transition, list all inputs (including seed treatments, coatings, inoculants, or potting soil) on the Input Materials List. Also keep documentation of non-GMO status of those materials for certifier review (such as receipts, affidavits from seller, seed tags, etc.).

I agree

3. If you use any non-organic planting materials in transition, please check this box

You should discuss with your certifier and may have additional requirements for organic certification.

Recordkeeping

NOP § 205.103

Background. A certified organic operation must maintain records related to the production and harvesting of agricultural products that are or that are intended to be represented as organic.

These records must:

- be operation-specific
- fully disclose all activities and transactions of the operation in sufficient detail to be understood and audited
- cover the entire time from acquisition, through production, to sale or transport
- be traceable back to the last certified operation
- include audit trail documentation for products produced by the operation
- be maintained for at least five years

Instructions: *Transitional producers must demonstrate a recordkeeping plan that will satisfy these requirements upon certification as organic. Adherence to this plan will not be used to evaluate eligibility for transition.*

1. What records do you maintain or plan to maintain for your transitional production? This can include records of planting, application of input materials, compost production, monitoring, harvest, sanitation, transport, shipping, purchase, sales, storage, or others.

Input Materials List

NOP § 205.105

Background. Organic products must be produced without the use of:

- Synthetic substances and ingredients, except as provided in [§ 205.601](#) or [§ 205.603](#)
- Nonsynthetic substances prohibited in [§ 205.602](#) or [§ 205.604](#)
- Nonagricultural substances used in or on processed products, except as otherwise provided in [§ 205.605](#)
- Non-organic agricultural substances used in or on processed products, except as otherwise provided in [§ 205.606](#)
- Excluded methods, except for vaccines that are approved in accordance with [§ 205.600\(a\)](#)
- Ionizing radiation, as described in Food and Drug Administration regulation, [21 CFR 179.26](#); and
- Sewage sludge

Instructions: Transitional producers must not use any prohibited materials in their production, and must disclose the last use of a prohibited material in the Land Information and History section above.

On this table, identify all inputs, products, and substances you use or plan to use in transitioning production in the table below. This includes soil mixes, fertilizers, pesticides, adjuvants, inoculants, growth regulators, mulch, compost, manure, biologicals, seed treatments, and all cleaners and sanitizers used on food contact surfaces. Your certifier will confirm that the materials you use or plan to use are allowed for use; check with them prior to use in order to prevent any impact to your transition timeline.

Upon organic certification, be prepared to provide labels and other records of inputs to your certifier for verification.

Full Product Name:	Manufacturer:	Intended Use: <i>(Ex: Fertility, Pest Control, Seed Treatment, Post-Harvest Sanitizer, etc.)</i> <i>Note - this is not intended to evaluate eligibility for transition</i>

To be certified organic, producers must meet the following regulatory requirements (or rules) (pages 11-18).

Transitional producers must show they are developing a plan to do so.

Natural Resources & Biodiversity

NOP § 205.200

Background. Organic production practices must maintain or improve the natural resources of the operation, including soil and water quality.

Instructions: *Transitional producers must demonstrate that they are developing a plan to meet these natural resources and biodiversity requirements. To be certified organic, producers will also need to monitor and document biodiversity.*

- 1.** Describe how you will maintain or improve soil quality on transitioning land. This can include adaptation to extreme climate conditions, competitive exclusion of plant pathogens, long-term storage of soil carbon, adding organic matter, conservation/restoration, minimizing disturbances (including using no-till or other soil health practices), maximizing diversity/living roots/cover, creating/conserving/restoring vegetative covers, preventing erosion, capturing eroded soil, or other.

- 2.** Describe how you will maintain or improve water quality on transitioning land. This can include managing crop nutrients to protect water quality, managing waterways/terraces to help control erosion and filter pollutants, conserving/restoring areas that absorb and hold water, choosing crops with water conservation in mind, using suitable irrigation, monitoring soil moisture, or other.

Soil Fertility and Management

NOP § 205.203

Background.

Organic producers must:

- use tillage and cultivation practices that maintain or improve the soil and minimize soil erosion
- manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials
- manage plant and animal materials to maintain or improve soil organic matter content in a way that does not contribute to contamination of crops, soil, or water (this includes specific requirements for the use of raw animal manure, compost, and uncomposted plant materials)

Organic producers may:

- manage crop nutrients and soil fertility to maintain or improve soil organic matter content in a way that does not contribute to contamination of crops, soil, or water by applying certain substances with certain regulatory restrictions

Organic producers must not use:

- any fertilizer or composted plant and animal material that contains a synthetic substance not included on the National List of allowed synthetic substances
- sewage sludge (biosolids)
- burning to dispose of crop residues, except to suppress disease or stimulate seed germination

Instructions: *Transitional producers must demonstrate that they are developing a plan to meet these soil fertility and management requirements. To be certified organic, producers will also need to monitor the effectiveness of this plan.*

1. Describe what you will do to protect soil and minimize erosion on transitioning land. This can include conservation tillage, strip cropping, contour farming, ground cover, cover cropping, micro-irrigation, windbreaks, terraces, or other.
2. Describe what you will do to manage crop nutrients and soil fertility on transitioning land. This can include crop rotations, cover cropping, application of plant/animal materials, tillage practices, hedgerows, alley cropping, intercropping, or other.
3. If you use or plan to use (a) compost that contains manure, (b) raw animal manure, or (c) micronutrients (such as boron, zinc, or copper) on transitioning land, check this box
You should discuss with your certifier and may have additional requirements for organic certification.

Crop Pest, Weed, and Disease Management

NOP § 205.206

Background. Organic producers must prevent crop pests, weeds, and diseases using practices such as:

- crop rotation and soil and crop nutrient management practices
- sanitation measures to remove disease vectors, weed seeds, and habitat for pest organisms
- cultural practices that enhance crop health, such as selecting plant species and varieties that are suitable for site-specific conditions and/or resistant to prevalent pests, weeds, and diseases

Organic producers may control pests through mechanical or physical methods including augmentation or introduction of predators or parasites; development of habitat for natural enemies of pests; or natural (nonsynthetic) controls, such as lures, traps, and repellents.

Organic producers may control weeds through mulching with fully biodegradable materials; mowing; livestock grazing; hand weeding and mechanical cultivation; flame, heat, or electrical means; or plastic or synthetic mulches (that must be removed from the field at the end of the growing/harvest season).

Organic producers may control disease through management practices which suppress the spread of disease organisms, or application of natural (nonsynthetic) biological, botanical, or mineral inputs.

If the above practices are not effective, a biological or botanical substance or a substance included on the National List of allowed synthetic substances may be used.

Organic producers must not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock.

Instructions: *Transitional producers must demonstrate that they are developing a plan to meet these crop pest, weed, and disease management requirements. To be certified organic, producers will also need to monitor the effectiveness of this plan.*

1. Describe what you will do to prevent crop pests, weeds, and diseases. This can include crop rotation, soil or crop nutrient management, sanitation measures, selection of species for resistance, or other.

2. Describe what you will do to control pest problems. This can include introducing or augmenting pest predators/parasites, using lures/traps/repellants, developing habitat for pests' natural enemies, or other.

3. Describe what you will do to control weed problems. This can include mulching, mowing, livestock grazing, hand weeding/mechanical cultivation, or other.

4. Describe how you will suppress the spread of disease on transitioning land.

5. If you use or plan to use (a) natural (nonsynthetic) biological, botanical, or mineral inputs to control disease problems, or (b) substances on the National List of synthetic substances allowed for use in organic crop production to prevent, suppress, or control pests, weeds, or diseases, check this box
These inputs should be listed on the Input Materials List. Further, you should discuss with your certifier and may have additional requirements for organic certification.

Contamination & Commingling Prevention

NOP § 205.272

Background. Organic handlers must prevent the commingling of organic and non-organic products and protect organic products from contact with prohibited substances.

Organic handlers may not:

- commingle or fail to maintain separation of organic and non-organic products, resulting in potential loss of organic identity
- use packaging materials, storage containers, or bins that contain a synthetic fungicide, preservative, or fumigant
- use or reuse any bag or container that has been in contact with any substance in a way that would compromise the organic integrity of any organic product placed in those containers, unless the bag or container has been thoroughly cleaned and poses no risk of contact of the organic product with the substance used

Instructions: *Transitional producers must demonstrate that they are developing a plan to meet these contamination and commingling prevention requirements.*

1. Describe how you will prevent contamination and commingling of organic products. (Contamination means allowing prohibited materials to be in contact with organic products, such as if a cleaner or fumigant has direct contact with food. Commingling means mixing organic and non-organic products.)
2. If any equipment will be used for both organic and non-transitioning crops, check this box
You should discuss with your certifier and may have additional requirements for organic certification.
3. If you irrigate, check this box
You should discuss with your certifier and may have additional requirements for organic certification.
4. If there will be installations of treated lumber on land after certification, check this box
You should discuss with your certifier and may have additional requirements for organic certification.
5. If you store organic and non-organic crops or products in or near the same location, check this box
You should discuss with your certifier and may have additional requirements for organic certification.
6. If you store or use materials not approved for organic production, check this box
You should discuss with your certifier and may have additional requirements for organic certification.
7. If you will be responsible for the transport of organic crops, check this box
You should discuss with your certifier and may have additional requirements for organic certification.

Organic Handling Requirements

NOP § 205.270

Background. “Handle” is defined as “to sell, process, or package agricultural products, including but not limited to trading, facilitating sale or trade on behalf of a seller or oneself, importing to the United States, exporting for sale in the United States, combining, aggregating, culling, conditioning, treating, packing, containerizing, repackaging, labeling, storing, receiving, or loading.”

Other examples of handling include mechanical or biological methods such as cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, distilling, extracting, slaughtering, cutting, fermenting, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing; and the packaging, canning, jarring, or otherwise enclosing food in a container.

Certain non-agricultural substances and non-organically produced agricultural products may be used; prohibited practices or substances may not be used.

Instructions: *Transitional producers must demonstrate that they are developing a plan to meet these handling requirements, if they do any such activities.*

1. If you do any post-harvest handling (such as drying, cutting, cooking, curing, heating, churning, separating, distilling, extracting, fermenting, preserving, dehydrating, freezing, chilling, packaging, washing/ringing, baking, pressing, mixing, grinding, threshing/shelling, roasting, or others), check this box

You should discuss with your certifier and may have additional requirements for organic certification