



1400 Independence Avenue, S.W.
Room 2646-South, STOP 0268
Washington, DC 20250-0201

January 18, 2010

MEMORANDUM FOR THE CHAIRPERSON OF THE NATIONAL ORGANIC STANDARDS BOARD

FROM: Miles McEvoy
Deputy Administrator
National Organic Program (NOP)

A handwritten signature in blue ink, appearing to read "Miles McEvoy", with a large, stylized flourish at the end.

SUBJECT: Request for recommendation regarding programs that evaluate and approve materials used in organic production and handling

The NOP is interested in developing a more uniform and consistent procedure for evaluating the competency and quality of material evaluation programs, as performed by accredited certification agencies or by third party organizations.

The NOP is requesting that the National Organic Standards Board (NOSB) develop a recommendation that delineates the criteria that should be used by certifying agents and third party organizations to evaluate materials used in organic production and handling. The recommendation should include the criteria and process that should be used to determine the approval of input substances used in crop production (e.g. fertilizers, pest control materials, soil amendments, crop production aids) livestock production (e.g. feed supplements, feed additives, medications and livestock production aids), post-harvest handling, and food processing (e.g. processing aids, sanitizers, facility pest control materials).

Criteria may include items such as:

- Standard procedures for evaluating materials,
- Role of inspections in evaluating compliance of input materials
- Qualifications of material reviewers and inspectors of material input manufacturers,
- Training requirements for evaluators of materials,
- Type of documentation and records needed,
- Depth of review,
- Frequency of review (e.g. is once every three years sufficient),
- Confidentiality of records, and
- Accreditation requirements (e.g. ISO Guide 65 compliance)

The NOP suggests the NOSB Compliance, Accreditation and Certification Committee begin with a review of the following resources as they conceptualize their recommendation. It may be prudent to first pull together a discussion document for the April 2011 NOSB meeting that could evolve into a committee recommendation for the Fall 2011 NOSB meeting.

Resources:

- [IFOAM Accreditation Criteria](#), Section 8.2 *Approval or Certification of Inputs* p. 45
- [WSDA Guide to Brand Name Material Registration](#)
[15.86.130](#) Brand name materials list of registered materials -- Application for registration -- Right to enter premises -- Rules -- Denial/suspension/revocation of a registration, grounds.
[15.86.140](#) Brand name materials list -- Fees.
- OMRI procedures manual – contact Peggy Miars, peggy@omri.org
- CA state law, [AB 856](#)
- Accredited Certifiers Association Materials Review Task Force – contact Patricia Kane, patriciakane@accreditedcertifiers.org
- OTA Fertilizer Task Force, Jan. 2010 – [Compliance Plan Guidance Document for Inputs Used in Organic Crop and Livestock Production](#)

NOP Training Information, [Input Approval under the National Organic Program with a special emphasis on Liquid Nitrogen Fertilizers \(PDF\)](#)