

Similarities and Differences Between the National Organic Program (NOP), Food Safety Modernization Act (FSMA), and 3rd Party Food Safety Audits

Published October 2021
Updated January 2025

The contents of this guide have been reviewed. Always check directly with your Organic and/or Food Safety agency for the specific information for your operation. This project was originally funded by the USDA's National Institute of Food and Agriculture's Food Safety Outreach Program Grant #2020-70020-32266.

The updates and expansion of this guide was supported through the United States Department of Agriculture (USDA) Transition to Organic Partnership Program (TOPP). TOPP is a program of the USDA Organic Transition Initiative and is administered by the USDA Agricultural Marketing Service (AMS) National Organic Program.



**TRANSITION TO ORGANIC
PARTNERSHIP PROGRAM**

What is it?

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>The National Organic Program (NOP) is a federal regulation in the United States that describes the requirements raw agricultural products must meet to be approved as a certified organic product. The law covers crops grown on farms, livestock animals, and food products made at processing facilities. Getting certified is a voluntary process that farms participate in to market their crops as Certified Organic. Farmers apply to become Certified Organic through an accredited certifying agency (CCOF, Primus Auditing Ops, Oregon Tilth, etc.) and must be inspected annually to maintain certification.</p>	<p>The Food Safety Modernization Act (FSMA) is a federal food safety regulation that has seven main sections that cover various parts of the supply chain. One part, the Produce Safety Rule (PSR), applies at the farm level. Produce farms are classified into one of three categories under this section of the law: 1) fully exempt, 2) qualified exempt (partially exempt), or 3) fully covered or need to be in full compliance. This guide provides information on what farms that need to be in full compliance (also called “covered” farms) must do. Please refer to CAFF resources for what farms with a full or qualified/partial exemption need to do.</p>	<p>3rd Party audits are voluntary processes that farms participate in to certify their food safety practices. Certain Good Agricultural Practices (GAPs) are required to achieve certification, depending on the audit type and scope. Farmers can request a 3rd party audit from state agencies (USDA Harmonized GAP, USDA Harmonized GAP+, Global GAP, etc.) or from private companies (CCOF, SCS Global, Primus Auditing Ops). There are different types of 3rd party audits, ranging from simple to very complex. A farmer chooses which crops they want to be included in the audit. This resource focuses on the USDA Harmonized GAP Audit standard as it closely aligns with FSMA, and is generally accepted by many buyers. Check with any buyer(s) to make sure you know what audit type they require. The USDA Harmonized GAP Audit has three main sections: 1) General Questions, 2) Field Operations and Harvesting, and 3) Post-Harvest Operations. This guide provides info on all three sections.</p>

When did the program start?

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>The NOP was signed into law in 1990 as the "Organic Foods Production Act." The law stated that organic products couldn't be sold into the marketplace until October 1st, 1993.</p> <p>An additional law, Strengthening Organic Enforcement (SOE), was finalized in 2023 and has updated the NOP to prevent organic fraud as organic supply chains become increasingly complex.</p>	<p>The FSMA was signed in 2011 by President Obama. The Food and Drug Administration released subparts of the law for public comment in 2015. As part of the law, state departments of agriculture inspect fully covered produce farms to ensure compliance. The first inspection dates started in 2018, but the first inspections did not start until 2019, with large farms. The last inspection dates for the smallest farms started in early 2021. New water system inspection requirements, which were finalized in 2024, will be enforced starting in 2025, 2026, or 2027 depending on your farm's size.</p>	<p>The USDA Harmonized GAP program started in 2011. In 2018, USDA voluntarily aligned the Harmonized GAP Audit program with FSMA requirements. If a farm passes a USDA Harmonized GAP Audit, that farm is <i>likely</i> to pass a FSMA inspection.</p> <p>Passing a USDA Harmonized GAP Audit (or any other 3rd Party Food Safety Audit) does not replace a FSMA inspection. A farm is still subject to a FSMA inspection by the Produce Safety Program in California.</p>

Why should you care?

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>Certified organic products often fetch a higher price than their conventional counterparts because buyers will pay a premium for confirmation that their food has been grown using ecologically beneficial practices and that it does not contain synthetic pesticides or Genetically Modified Organisms (GMOs).</p>	<p>If your farm is categorized as Qualified Exempt or Fully Covered, you are legally required to be in compliance with FSMA standards and may be subject to inspection.</p> <p>Producing safe food is essential to the success of your business. No matter your farm's status under the FSMA PSR, farms are responsible for practicing food safety and minimizing produce safety risks.</p>	<p>A buyer may require that you become GAP certified in order to sell to them. Or, you do not have any buyers currently requiring GAP certification, but you want to expand potential market channels.</p>

When would you get inspected (NOP, FSMA) or audited (3rd party audit)?

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>While becoming certified organic is voluntary, inspections are a requirement for achieving and maintaining certification. Inspections are completed shortly after you apply in the first year, and annually thereafter.</p> <p>In certain cases, additional inspections may occur if there were issues of concern.</p>	<p>Food Safety Modernization Act inspections are mandatory as FSMA is a federal law.</p> <p>In California, the California Department of Food and Agriculture (CDFA) Produce Safety Program verifies that farms are in compliance with FSMA by conducting FSMA inspections on farms. <i>Farmers do not ask for a FSMA Inspection</i>; CDFA contacts farmers randomly and schedules inspections. With thousands of farms in California needing to be inspected, it is difficult to determine when your farm may be contacted for an inspection.</p>	<p>While becoming 3rd party certified is voluntary, audits are a requirement for achieving and maintaining certification. Audits are completed upon request and annually thereafter. Unannounced audits may occur approximately 30 days after the original audit, specifically during the growing season, and can serve as additional verification by the auditor if there were issues of concern.</p> <p>You should schedule the audit for times in the season when the activities under your requested scope (e.g. harvesting, handling) are actively occurring. You cannot schedule an audit during the "off-season" as auditors need to observe many farm activities as they are happening. You want the auditor to see the harvest for as many crops, or types of crops, as possible because the audited crops will be listed on your audit certificate.</p>

How much does it cost?

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>Prices can vary since some certifying agencies charge based on organic acreage and some charge by the farm's gross revenue. Audit fees include pre-audit prep, travel, on-farm audit time, submission, and review. There is often a one-time application fee (~\$300) before the first inspection.</p> <p>Contact approved certification bodies for their specific pricing requirements. Please refer to CAFF's Organic Certifier Comparison Tool for detailed information about the major certifiers and their pricing schemes.</p>	<p>In California, farmers cannot be charged for a FSMA Produce Safety Rule inspection. Your farm may incur other direct costs (e.g. water tests, employee training costs) as you achieve and maintain compliance with the law.</p>	<p>Prices can vary since private companies and the USDA provide this auditing service. Audit fees include pre-audit prep, travel, on-farm audit time, submission, and review. You are charged whether you pass or fail the audit, so it's crucial to be as prepared as possible to minimize costs and not have any reasons for an automatic failure.</p> <p>Contact approved certification bodies for their specific pricing requirements.</p>

Who provides certification?

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>Businesses (and, occasionally, county Departments of Agriculture) have to apply to USDA to become an accredited Organic Certifying Body. Once they are approved they are allowed to conduct organic certification inspections.</p> <p>You can search the USDA database by state to find certifying bodies close to your geographic location. There are over 50 certifying bodies in the United States.</p>	<p>In California, FSMA inspections are done by the CA Department of Food & Agriculture Produce Safety Program.</p>	<p>The USDA Harmonized GAP Audit is usually provided through your state Department of Agriculture.</p> <p>The Harmonized GAP audit is also offered by private certifiers.</p>

Is it required by law?

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>No. Becoming certified organic is a voluntary certification.</p>	<p>FSMA is a federal law.</p> <p>If your farm meets the criteria of being “Covered” under FSMA you must follow all covered farm requirements. No matter your farm’s FSMA status, all farms are required to practice food safety to minimize food safety risks.</p>	<p>No. Undergoing a 3rd party audit is voluntary. This is typically a buyer requirement.</p>

How does the farm receive certification?

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>You must create a thorough Organic System Plan (OSP) to document your organic practices. Check with your certifier to ensure that you are using their specific required OSP documents. Once you submit your OSP, the certifier will review it and if it is accepted, they will proceed with scheduling an on-site inspection. After passing the inspection, the farm will receive a formal organic certificate.</p>	<p>If a farm is selected for an inspection, the farmer is provided an inspection report afterward.</p>	<p>To become certified, at least 80% of each section of your farm's audit checklist must be marked compliant. The relevant scopes depend on what parts of your operation you are requesting to be audited.</p> <p>Farmers need to submit the SC-430 Vendor Form, Request for Audit Service Form SC-237A, and the Agreement for Participation in Audit Services Form SC-651 to USDA to schedule an audit.</p>

How long does the certification last?

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
For one year from the date of issue of your organic certificate.	All farms that are considered "fully covered" and need to be in compliance with FSMA PSR are expected to follow the law and be in compliance for perpetuity. If a farm has a FSMA Inspection, they are still eligible to be inspected in the future. Inspections are typically conducted based on size and will continue as long as you remain a covered farm.	For one year from the date of the previous audit.

What are the labeling requirements?

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>You must have an active organic certificate for the product scope in question to use the USDA Organic logo. For processors/handlers, requirements differ depending on whether you are using any of these phrases with the Organic logo: 100% Organic, Made with Organic, and Products with less than 70% organically produced ingredients.</p>	<p>FSMA requires both Covered Farms and Qualified Exempt farms to ensure the farm name and physical address is available at the point of sale. This information should be visible at farmer's market booths, farm stands, CSA boxes, and/or wholesale boxes.</p> <p>If your farm is Fully Exempt from FSMA because you sell raw products for processing (e.g. tomatoes into sauce) then all boxes leaving the farm should say, "Not for Raw Consumption."</p>	<p>To use the USDA GAP Logo, you need to have successfully passed the GAP audit for the product scope in question.</p>

Does it require a manual or plan?

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>An Organic System Plan (OSP) should be made and submitted to a certifying agency.</p> <p>The Organic System Plan should include:</p> <ul style="list-style-type: none"> -Description of practices on the farm and frequency they were performed -List of each input used in production -Description of monitoring practices to verify the plan is being effectively implemented -If applicable, description of practices and physical barriers on preventing commingling of organic and non-organic products -Other documentation required for federal, state, or local government can take the place of information required in the organic system plan (i.e. you don't need a duplicative record) <p>Most certifying agencies have their own OSP templates that they require producers to complete. Check with your certifying body to see if they have specific templates they want you to fill out.</p>	<p>The FSMA Produce Safety Rule does not require that you have a food safety plan; however there are various recordkeeping requirements.</p> <p>FSMA requires certain records for Fully Covered farms (e.g. employee training logs signed by a Food Safety supervisor, etc.). Qualified and fully Exempt farms must keep records verifying their qualified exempt status.</p>	<p>A food safety plan with various records, standard operating procedures (SOP's), and a risk assessment are required.</p> <ul style="list-style-type: none"> -Must designate a Food Safety Manager, a person who knows how the farm is managed with respect to food safety, to be responsible for ensuring compliance with the plan and practices on the farm. -The food safety plan must have a disciplinary policy for food safety violations. -The food safety plan must be reviewed annually and any time there is a change in food safety policy on the farm. -You may have to submit a copy of your food safety plan to the auditor in advance of your in-person audit and have it present the day of your audit for the auditor to review/reference. -The food safety plan and accompanying records, Standard Operating Procedures (SOP's), and other applicable records, must be in place for <i>at least a month</i> before the audit occurs.

Recordkeeping Topics

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>The following records must be kept:</p> <ul style="list-style-type: none"> -Monitoring of natural resources (e.g. wildlife, soil, and water around the farm) -Preventative measures taken for pests and disease (e.g. pruning, trapping) -Inputs (e.g. fertilizer, pesticides, compost) -Harvest -Postharvest Handling -Sales -Seed sourcing to ensure that organic seed has been purchased when available <p>Your certifier will review and verify these records during your annual on-site inspection.</p> <p>Records need to be kept for a minimum of 5 years.</p>	<p>Fully Exempt and Qualified Exempt farms must keep some records to prove their exemption status. Some examples may include:</p> <ul style="list-style-type: none"> -Sales records to prove you are under a specific sales threshold -Seed records to prove you only grow crops that are Rarely Consumed Raw -Written documentation proving that your crops go through a “kill step” <p>Fully Covered farms must keep records in the following categories:</p> <ul style="list-style-type: none"> -Water: water test results and annual water system inspection -Soil Amendments of Animal Origin: Certificate of Analysis for purchased inputs; time, temperature, and turning records for compost made on-farm -Equipment Cleaning: record of the date and method of cleaning and sanitizing equipment used in harvesting, packing, and holding activities <p>Records need to be kept for a minimum of 2 years.</p>	<p>There are four main audit scopes: 1) General Questions, 2) Field Operations, 3) Post-Harvest Operations and 4) Logo Use. You need to determine which of the scopes are required by your buyer to complete for your audit. All farms are required to complete the General Questions scope, and many farms will also wish to complete Field Operations, Post-Harvest or both. Logo Use is rarely used by small farms.</p> <p>There are 81 mandatory items within the Harmonized GAP Audit. If your farm is found non-compliant on one or more of the 81 mandatory items, you will not pass the audit.</p> <p>Required records: Designated food safety individual(s), Disciplinary policy for food safety violations, Approved Supplier program for all incoming materials, Water Quality, Post-Harvest area cleaning, Harvest tool cleaning, Traceability, mock recall, Recall Program, Corrective actions, self-audit, record of annual internal self-audit.</p> <p>Records need to be kept for a minimum of 2 years.</p>

Risk Assessments

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>Though written risk assessments are not required under the NOP, farmers should be in the practice of assessing their organic farming systems for the potential risk of contamination from prohibited substances onto their fields or crops and/or commingling of nonorganic products with certified organic products. These informal assessments will help inform the establishment of “buffer zones” around your organic fields and property boundaries, as well as systems for keeping organic produce separate and well-labeled during harvest, postharvest handling, and transport.</p>	<p>FSMA takes a preventative approach to food safety and encourages farmers to conduct risk assessments often to determine areas of the farm where food safety risks can be minimized or mitigated.</p> <p>Under the new Final Rule for pre-harvest agricultural water, farmers are responsible for performing (at least once annually) a risk assessment of the farm’s water systems. This includes an assessment of the type of water source (surface, well, municipal) as well as the method of irrigation (overhead, drip, flood) and all the potential areas for pathogen introduction in the water system, thereby increasing the food safety risk to the crops. Depending on the results of this assessment, mitigation practices and/or additional assessments may be necessary within the same farm season.</p>	<p>Risk assessments are required for each potential hazard on the farm at these frequencies:</p> <ol style="list-style-type: none"> 1) annually, 2) when major changes to procedures occur (e.g. new packing shed), 3) before harvesting a crop, and 4) when an injury happens on the farm.

Employee Training Requirements

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>Employees with decision making authority for organic practices on the farm must have adequate training. In particular, employees responsible for applying soil amendments, fertilizers, pesticides, and other approved substances should be familiar with NOP National List of Allowed and Prohibited Substances (205.601 and 602).</p>	<p>All workers must be trained upon hire and then at least once a year thereafter.</p> <p>At least one supervisor or responsible party from the farm needs to attend the FDA approved training (PSA Grower training or accredited alternative) and have the certificate of attendance to provide during a FSMA PSR Inspection.</p>	<p>All personnel need to receive food safety training sufficient to their responsibilities.</p> <p>Training should occur upon hire and at least annually.</p> <p>Contracted personnel must be held to the same food safety standards as employees.</p> <p>Employee training must be provided in the language(s) workers can understand.</p>

Worker Health & Hygiene

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>National Organic Program requirements do not cover anything related to this topic.</p>	<p>All workers must be trained on: principles of food hygiene and food safety, recognizing symptoms of a health condition that is reasonably likely to result in contamination of produce, and any FSMA related standards that apply to their job.</p> <p>Harvest employees must also be trained on recognizing covered produce that must never be harvested (e.g. with feces on it), not harvesting dropped produce, inspecting harvest containers for any contamination, and correcting any problems with harvesting equipment or containers.</p> <p>Visitors to the farm must be provided clean bathrooms and handwashing stations and should be aware of, through training and/or signage, the farm's food safety policies and procedures for visitors.</p>	<p>Employees and visitors shall be made aware of good personal hygiene practices (e.g. proper handwashing practices, signs of sickness), clothing and footwear needs to be clean and in good condition, and they should understand what to do in the event of sickness or injury. Auditors typically question employees about this during the audit.</p> <p>The farm must be in compliance with OSHA toilet requirements and have proper handwashing stations adjacent to the toilet facilities.</p> <p>Signs must be posted around the farm to remind employees and visitors about handwashing, break areas, bathroom locations, and the farm's policies and procedures.</p>

Soil Amendments

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>The Organic System Plan should mention steps taken by the farmer to nurture soil fertility and improve soil organic matter content through proper tillage, crop rotation, cover cropping, and manure management. A farmer can apply the following products (as long as they are on the national list of allowed products) to a field to improve soil organic matter content: nutrients, soil amendments, mined substance of low solubility, mined substance of high solubility as long as it's used according to the National List of non-synthetic materials or ash as long as it was from an organic item that burned. Raw manure must be applied at least 90 days prior to harvest for crops that have edible portions that do not touch the ground (e.g. trellised tomatoes) and at least 120 days prior to harvest for crops that do touch the ground (e.g. melons). Farmers can not apply sewage sludge (biosolids) to their fields. Farmers can not burn crop residues unless it is to suppress disease or stimulate seed germination. Any products used on the farm or in the fields must be on the farm's approved material's list and all applications must be documented in an input log.</p>	<p>If you purchase soil amendments that contain animal inputs than you need to get a Certificate of Analysis from the supplier that verifies that the amendment: 1) was treated according to a validated process (e.g. high heat) and 2) that the soil amendment was handled and stored in a manner to reduce the risk of contamination.</p> <p>If you're making any on-farm compost that contains animal inputs you need to have records of the time, temperature, and turning for each batch. The on-farm compost must be made according to the turned or static composting methods. As of publication of this document, FSMA has adopted the 90-120 Day Rule outlined in the National Organic Program. Purely plant-based amendments are not considered a food safety risk under FSMA.</p> <p>If agricultural teas use an additive, such as molasses, yeast extract, or algal powder, then this tea is considered an untreated soil amendment of animal origin, and therefore must comply with the 90–120 Day Rule of the NOP.</p>	<p>If you purchase soil amendments that contain animal inputs than you need to get a Certificate of Analysis from the supplier that verifies that the amendment: 1) was treated according to a validated process (e.g. high heat) and 2) that the soil amendment was handled and stored in a manner to reduce the risk of contamination.</p> <p>If you're making any on-farm compost that contains animal inputs you need to have records of the time, temperature, and turning for each batch. The on-farm compost must be made according to the turned or static composting methods. As of publication of this document, FSMA has adopted the 90-120 Day Rule outlined in the National Organic Program. Purely plant-based amendments are not considered a food safety risk under FSMA.</p> <p>If using compost teas you should only use finished compost and water that has no detectable generic E. coli per 100ML. It's best to have an SOP on compost tea use.</p> <p>Ag chemicals need to be stored, applied and disposed of correctly.</p>

Water

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>Farming practices must improve or maintain the quality of the water on the farm. Producers must manage soil organic matter without contaminating nearby bodies of water with plant nutrients, pathogens, metals, or residue.</p> <p>If a chlorine based sanitizer is used in irrigation water applied to crops it must not exceed the maximum allowed disinfectant limit under the Safe Drinking Act (less than 4 PPM).</p>	<p>In accordance with the FDA's Final Rule on Pre-harvest agricultural water, farmers must conduct a once-annual water assessment which encompasses risk evaluation in the following areas: location of water source and type of water system, type of water application method used on-farm (overhead, drip, flood irrigation), crop characteristics and susceptibility to contamination, environmental conditions that may increase food safety risks on the farm (rain, wind, flood events), and any other relevant factors. If risks are identified, farms must identify corrective or mitigating actions. Depending on the severity of the risks identified, the farmer will be required to immediately discontinue use, or implement mitigation measures within the same season, or test the pre-harvest water as indicated by the risk assessment.</p> <p>Drinking, handwashing, and water used for harvest/post harvest purposes must have 0 generic <i>E. coli</i> per 100 mL.</p>	<p>There must be a written procedure that outlines the water testing procedure, actions taken based on the results, training requirements, and explanation on when situations require a review of the food safety plan. Water testing will be done at a frequency based on current industry standards. An initial water system risk assessment is required and documentation of risks identified must be made.</p> <p>There should be a written description of the water system (e.g. map, narrative, photos). Water systems shall not be cross-connected with any waste water systems. If water treatment is used it must be monitored.</p> <p>Drinking, handwashing, and water used for harvest/post harvest purposes must have 0 generic <i>E. coli</i> per 100 mL.</p>

Land

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>You can certify an entire farm or just part of the farm as long as the certified field(s) is surrounded by “buffer zones” that can adequately prevent contamination of nonorganic materials onto the certified organic field.</p> <p>Certified organic land must have been free of any prohibited substances for 36 months prior to the first certified organic harvest.</p> <p>A Land Use letter from the previous landowner and/or affidavits from neighboring landowners can be helpful to document that your cropland is free of prohibited substances and can be used for certified organic crops.</p>	<p>FSMA encourages farmers to understand how cropland was used prior to production and any potential food safety risks.</p> <p>Wildlife intrusion from adjacent properties can be a common food safety risk on farms. Farmers should assess the potential areas where grazing/working/wild animals could contaminate your crops. See Wild & Domestic Animals section for more information.</p> <p>Also consider adjacent land uses as nearby garbage dumps, confined animal feeding operations, and other land uses, can pose a risk for your farm.</p> <p>Crops that are in the field during a flood event must not be harvested.</p>	<p>The farm should be free of excess litter and uncontained trash, including culled produce. Trash can not come into contact with produce.</p> <p>The farm must have a waste management plan.</p> <p>Sewage and septic systems must be adequately maintained.</p> <p>If a flood event occurs then you would need to do a new land risk assessment. If there is heavy rain and water pools on the surface of the soil before percolating into the soil that is not considered flooding. Crops that are in the field during a flood event must not be harvested.</p>

Equipment, Tools, and Buildings

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>A farmer can not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock. If treated lumber was already present on the farm before the 36-month organic transition period, it is allowed.</p> <p>Any equipment that is used to produce or handle both organic and nonorganic products must be cleaned in between uses and records of this process must be maintained.</p>	<p>Farmers are required to keep a record of the date and method of cleaning and sanitizing equipment used in harvesting, packing, and holding (storing) activities. Employees must be trained in proper cleaning and sanitizing practices.</p> <p>Any field equipment coming in contact with covered produce must be adequately inspected, maintained and cleaned. Equipment and materials must be adequately separated from areas where produce is processed.</p>	<p>A farmer must keep a list of all equipment on the farm that may contact produce, as well as a written procedure on how to control any spills from this equipment. Maintain vehicle and equipment maintenance records. The farm should have a written policy, procedures, and a checklist to verify cleanliness of vehicles used to transport produce.</p> <p>Handwashing and sanitation equipment must be available, kept clean, and not become a source of contamination. If gloves are used, make sure there is a policy in place and training provided on proper use and changing frequency.</p> <p>Any cleaning and sanitizing procedures should not pose a risk to contaminating produce and should be documented within a SOP. Maintain records of the date and method of cleaning and sanitizing equipment.</p> <p>Coolers must be properly sealed and have drainage so that pooling water is minimized. Condensate dripping from pipes or condensers must not drip onto produce.</p>

Wild & Domestic Animals

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>See the soil amendment section on page 17 for raw manure application timing requirements.</p>	<p>FSMA requires that if significant evidence for potential contamination is found (e.g. animal feces present) you must evaluate whether produce can still be harvested. If there is evidence of animal intrusion in a crop field, the farmer should implement a reasonable “buffer zone” around the contaminated area from which the crop should not be harvested.</p> <p>Domestic animals are not prohibited, but need to be excluded from production areas.</p> <p>Pets can be considered working animals and should be monitored. Farms with pets should have a corrective action plan in place if pets contaminate production areas. Visitors should not bring pets to the farm.</p>	<p>Written risk assessment on animal activity in and around the production area. Depending on risk assessment results, practices are put in place and noted in a standard operating procedure (SOP) to minimize potential contamination from animals (e.g. fencing, reflective materials, hedgerows).</p> <p>Monitoring for animal activity near and in the growing areas happens throughout the season.</p>

Biodiversity & Conservation

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>Organic practices promote cycling of resources, ecological balance, and conservation of biodiversity on the farm.</p> <p>OSPs must contain a Monitoring Plan for wildlife and natural resources on and around the farm.</p>	<p>FSMA does not require covered farms to exclude animals from outdoor growing areas, or to destroy animal habitat or otherwise clear farm borders around outdoor growing areas or drainages in the name of food safety.</p> <p>Farmers are allowed and encouraged to practice co-management. Co-management is a variety of practices that allow farmers to balance food safety and biodiversity practices to maximize the success of both. For example, research has shown that having hedgerows is good for improving biodiversity on the farm and actually also helps reduce food safety risks as wild animals are more likely to stay in the hedgerows and not go into the field.</p>	<p>Farmers are allowed and encouraged to practice co-management. Co-management is a variety of practices that allow farmers to balance food safety and biodiversity practices to maximize the success of both. For example, research has shown that having hedgerows is good for improving biodiversity on the farm and actually also helps reduce food safety risks as wild animals are more likely to stay in the hedgerows and not go into the field.</p> <p>Depending on circumstances, practices are put in place and noted in a standard operating procedure (SOP) to minimize potential contamination from animals (e.g. fencing, reflective materials, hedgerows).</p>

Pest Management

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>The NOP mandates that farmers employ pest prevention practices as a precondition to using other “natural” control methods such as trapping, introducing predator species, or other non-chemical control methods. The farmer must document that they first tried to manage the pest using preventative and “natural” control methods before they will be permitted to apply an allowed substance from the National List. Additionally, the farmer must follow the unique annotation outlined in the National List about how and when the pesticide product can be used.</p> <p>Organic processors/handlers (including farms that store edible crops on-site, such as grain storage or produce refrigerators) must remove pest habitat and/or food sources in these facilities.</p>	<p>FSMA requires continuous monitoring for pests such as mice in and around areas where covered produce is grown, packed or stored. FSMA does not regulate farm chemicals such as insecticides, pesticides, or fungicides (which are regulated by other federal and state entities).</p>	<p>Agricultural chemicals should be applied by a trained employee. Have an active copy of the pesticide applicators license on hand.</p> <p>Water used to apply any agricultural chemicals should not be a source of contamination. Disposing of agricultural chemicals should not be a source of produce or environmental contamination. Records must describe the means of disposing of chemicals and how equipment that comes in contact with chemicals is cleaned.</p> <p>Animals must be restricted from food handling areas. If rodent traps are used they should be located where they won't contaminate produce or food handling surfaces (do not use bait because that can attract more rodents). The farm should have written procedures (SOP) concerning pest management and record this info in a pest control log. If using an outside company for pest control, they should provide reports on dates they inspected traps and steps taken to eliminate problems.</p>

Seed & Transplants

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>Farmers can not use seeds or planting stock (tubers, saplings) that are not certified organic unless the farmer has demonstrated an inability to source organic options. This can be done by providing documentation that organic seeds are not available. Farmers may not use nonorganic seedlings unless the Agricultural Marketing Service has legally granted a temporary variance, which occurs rarely and typically following an extreme weather event or other significant disruption to agricultural business.</p> <p>Sprouts must be grown from certified organic seeds. There is no exception to the requirement to use organic seed.</p> <p>A farmer can use seeds, seedlings, or planting stock treated with a prohibited substance if required by Federal or State phytosanitary regulations.</p>	<p>Not addressed in the regulation.</p>	<p>Not addressed in the regulation.</p>

Harvest

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>The NOP requires farmers to implement measures in their harvest processes that prevent the commingling of organic and nonorganic produce. This is especially important on “mixed” operations (organic and nonorganic acreage within the same farm). Farmers with mixed operations will need an SOP describing how these crops are kept separate during harvest and how any shared harvest equipment is cleaned in between uses.</p>	<p>It is essential to ensure that crops with feces on it are not harvested. If a crop with feces or other contamination is found, a no-harvest buffer zone (between 0-25 feet) needs to be established depending on the severity of the contamination.</p> <p>Tools and equipment used during harvest must be cleaned and sanitized according to your farm’s procedures.</p>	<p>A pre-harvest risk assessment is required before every harvest. Any crop that does not grow on the ground that is dropped on the ground during harvest must be culled. Contaminated, damaged, or decayed produce must be culled.</p> <p>Required written procedures:</p> <ul style="list-style-type: none"> -Harvest containers and packaging material are being used for the correct products and postharvest activities (including which containers may touch the ground during harvest) -Inspecting food contact containers for cleanliness before they are used -Employee training on how to deal with any contaminated, damaged, or dropped produce -Water used during harvest must have zero detectable generic E. coli. Test results that document water quality must be available -Treatment of re-circulated water, if applicable. -If applicable, address control of wash water temperature.

Postharvest

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>Cannot use any packaging materials, storage containers, or bins that contain synthetic fungicides, preservatives, or fumigants.</p> <p>Chlorine products are allowed to be used in postharvest wash water as long as they stay under the maximum levels permitted by FDA or EPA for such purpose. Peracetic acid can be used in wash or rinse water and/or on food contact surfaces according to the FDA limits.</p> <p>Farmers must implement measures in their harvest and postharvest systems that prevent the commingling of organic and nonorganic produce throughout every step of the postharvest chain, including washing, packing, transport, and sale. Farmers on mixed operations will need an SOP describing how these crops are kept separate during postharvest and how any shared equipment is cleaned in between uses.</p>	<p>Water used for handwashing, washing crops, and making ice must be free of detectable generic E. coli.</p> <p>Make sure any trucks transporting packaged produce are not a source of contamination. If refrigerated units are being used, make sure they are maintained and monitored to reduce produce safety risks and that dripping condensate will not become a source of contamination on produce. Make sure all thermometers are working properly.</p>	<p>Harvested produce must be handled in a manner to prevent contamination. Food contact surfaces should be made of non-porous materials whenever possible (wooden tables/pallets are allowed if they are well maintained). Cloth rags that pose a risk for cross-contamination shall not be used to wipe produce. The packinghouse area is relatively free of litter, waste, and culls.</p> <p>Packaging materials should be appropriate for their use and stored in a manner that prevents contamination. Farm has a written policy regarding whether packaging materials can be in direct contact with the soil (e.g. during field pack).</p> <p>Cleaning products are only used in ways they are approved to be used. All chemicals are properly labeled and stored in a secured location (locked and away from produce).</p> <p>Postharvest buildings are constructed and maintained in a way to prevent contamination (buildings do not need to be completely enclosed). A written procedure is needed on how refrigerated equipment is cleaned and maintained. All tools used to monitor sanitizers or cooler temperatures should be maintained and accurate.</p>

Testing

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>Certifying bodies are occasionally required by USDA to test product residue for pesticides, insecticides, and fungicides. Your certifying agency may request a product sample from you to complete residue testing.</p>	<p>The water used in postharvest activities on the farm (e.g. washing crops, ice, handwashing water) must have zero generic E. coli. If you use municipal water for postharvest then you can look up their water testing results. If you use a well then you will need to test it to confirm it meets FSMA's requirement. Production water no longer has a testing requirement under FSMA, but you may want to test depending on your circumstances.</p> <p>If you are using an unvalidated treatment method for a soil amendment you will have to get that tested and provide documentation that the process works for reducing pathogens.</p>	<p>Required risk assessments contain testing requirements.</p> <p>If a hazard requires you to do testing (e.g. water testing) then you must follow certain practices and recordkeeping.</p>

Traceability

National Organic Program (NOP)	Food Safety Modernization Act (FSMA)	3rd Party Food Safety Audits
<p>Since the implementation of Strengthening Organic Enforcement (SOE) rules in 2024, organic inspectors are required to perform a traceback audit and a mass balance audit on organic farms, both of which test the integrity of the farm’s recordkeeping systems. In the traceback, the inspector will attempt to track one case of produce from seed to sale. In the mass balance audit, the inspector will verify that the amount of product being harvested is relatively equal to the same amount of product being sold.</p> <p>These audits will likely require farmers to incorporate a lot numbering system into their harvest and packing processes. A simple lot number could include the field block from where the produce was harvested and the date of harvest.</p>	<p>The Produce Rule of FSMA does not cover traceability. However, in May 2024 the separate Traceability Rule of FSMA was released. This resource does not cover the new Traceability Rule comprehensively, but general information is provided below:</p> <p>Starting in January 2026, food businesses will be required to comply with FSMA 204, the Food Traceability Final Rule. Covered farms must have a written Produce Traceability Plan, which includes records and lot numbers necessary to track each crop one step forward and one step backward in the supply chain. Farms will also be required to have written recall procedures and should conduct a “mock recall” once a year to ensure the functionality of those procedures.</p>	<p>Farmers must conduct a traceability exercise (often called a “mock recall”) annually and have a traceability program that tracks one step forward and backward for each crop.</p>