



Certification Timeline for Handling Operations

The first time through the organic certification can seem intimidating. There are many deadlines to keep, but once you understand the general timelines of the different processes, the yearly calendar of to-do's becomes a lot more manageable. This article details the different timelines involved in achieving and maintaining certification.



What You'll Learn

- Timeline for initial certification
- Options for expediting an application
- Elements of routine year-round recordkeeping
- Required mid-year updates to your certifier

The certification system contains many different timelines depending on the specific process you're working with. Thankfully, you can apply for certification at any time, as long as your certifier is accepting applications. Once you've started the process, there is a clear sequence of events and some set deadlines to stay on top of. Understanding the general process of events helps handlers stay compliant throughout the year, anticipate review periods, and avoid certification delays.

INITIAL CERTIFICATION TIMELINE

First-time applicants can submit their initial application at any time throughout the year. The entire process of initial organic certification takes about 3 to 6 months once a completed application is submitted to a certifier, although that is an average and can go either way. This timeline is heavily influenced by how complex your product formulations and supplier lists are, and whether all necessary documentation for ingredients and suppliers is submitted with the application. In general, more complete applications will be processed faster than ones that require more back and forth between certifier and applicant. Many certifiers offer an expedited timeline, although usually for a significant fee.

Most first-time applications come with follow-up questions from the certifier, which is normal and by no means a red flag. Your turnaround time in providing your certifier with the requested information is a major factor in how long the certification process takes. Certifiers often have their own deadlines for when they need to hear back from you addressing their questions. This is often around 3 to 4 weeks, but you can absolutely respond before the deadline!

Once your certifier confirms your application is complete and all questions are answered, your initial inspection will be scheduled. The initial on-site inspection must be conducted within a reasonable time from when your application is deemed complete. It must be scheduled for a time when all of your organic facilities can be observed and when the people responsible for your OSP are available.

After the initial inspection is conducted, the inspector will submit their report to the certifier, typically within 1 to 4 weeks. The certifier will then review the report and your application file and issue the determination letter, usually within a few weeks of receiving the inspection report. It is common for the certifier to have follow-up questions after the inspection that must be responded to before they can make a certification decision. Once all of their questions are satisfactorily answered, a decision is typically rendered within about a month. This varies greatly by certifier and the specific application.

Initial Certification Timeline	
Event	Timeline
First-time application for certification	3 to 6 months from application to decision, can vary significantly
Expedited Application	1 to 6 weeks from application to decision, varies widely by certifier
Response to your certifier’s requests for additional information	3 to 4 weeks to respond, can vary depending on type of information requested
Initial Inspection	Typically held within 1-3 months of submitting a completed application
Answer Follow-up Questions Post-Inspection	3 to 4 weeks to respond, can vary depending on type of information requested
Certification Decision Letter Issued	Typically about a month after all follow-up questions have been answered, varies greatly by certifier and application

 HANDLER TIP

Expedite your application
Operations facing short product launch deadlines can sometimes pay an additional fee for expedited services, where some certifiers may issue a decision in as short as eight business days after the date of the inspection.

Certifiers will prioritize their reviews of new handlers based on the timeline handlers give for first projected sales. Certifiers will prioritize their review of inspection reports based on various factors like the inspection date and issues noted in the report. You may not hear back from your certifier quickly after the inspection as your file is waiting in the queue for review.

ANNUAL COMPLIANCE CYCLE FOR CERTIFIED HANDLERS

Certified handlers must submit their renewal application annually, during a specific window set by their certifier. This is often in the autumn or early winter, or it's based on the certification anniversary date.¹ Once a handler submits their renewal application, the certifier must schedule and conduct an on-site inspection at least once per calendar year.¹

Certifiers must conduct unannounced inspections from time to time, as well. You may receive an unannounced inspection as part of your certifier's required random surveillance program,² or in response to an identified risk or compliance issue at your operation. While unannounced inspections should not give advance notice, inspectors may notify the operation up to 4 hours prior to their arrival in cases of extenuating circumstances, like biosecurity concerns.³

Day-to-Day and Mid-Year Recordkeeping Requirements

As a certified organic handler, you are required to maintain all records applicable to your organic certification for a minimum of 5 years after they are created.⁴

You must immediately notify your certifier of any changes that could affect compliance before they are implemented, even if those changes happen mid-year.⁵ These include but are not limited to changes in product formulation, production processes, ingredient suppliers, and product labels, as well as adding a new certified organic product or changes in your facility's location, layout, or organic management standard operating procedures. Depending on the nature of the change, you may need a targeted inspection to verify organic compliance before implementing the change.

Updates to Product Labels

All changes to product labels must be approved by your certifier prior to implementation. You must wait for certifier approval before printing new labels or running new formulas. A standard certifier review for a new product or label typically takes about 2 to 6 weeks, but is highly dependent on the completeness and timeliness of your communication with your certifier.

If previously approved labels become noncompliant due to regulatory or formulation changes, certifiers may grant a label use-up period. Ninety days is considered sufficient in most cases, but in no case can the use-up period exceed one year.⁶

Supplier and Ingredient Verification

With each annual renewal paperwork submission to your certifier, you will be required to verify that all of your suppliers of organic ingredients hold active organic certificates that include your specific ingredients. After their initial approval of an organic ingredient or processing aid, certifiers typically re-review the material at least every 5 years, but it can be more often based on the material's risk for contamination.⁷

If your product formulations include nonorganic ingredient alternatives, you will be required to conduct and document a commercial availability search for organic versions of those ingredients at least on an annual basis. Some certifiers may approve a cadence of up to 18 months, if that coincides with specific ordering and production schedules.⁸

"What we have been trying to do with our organic system plan is update as needed for the things that are critical. But for the big changes, we usually wait for the annual update - that is more effective, and also it's cheaper."

Humberto Maldonado
Director of Safety and Compliance
Organically Grown Company

Annual Certification Cycle Timeline

Event	Frequency	Timeline
Certification renewal paperwork submission ¹	Annually	Determined by your certifier, commonly either around your anniversary date or the close of the calendar year
Standard On-Site Inspection	Annually	2 to 6 weeks notice typically, held anytime during normal business hours
Unannounced Inspection ⁵	As needed	Anytime during normal business hours, no notice required, inspector <i>may</i> issue notice up to 4 hours in advance
Response to your certifier's requests for additional information	Common	3 to 4 weeks, can vary depending on type of information requested
Maintain all records applicable to certification ²	Ongoing	Retain archives for minimum of 5 years
Notify certifier of any changes that affect certification ³	As incurred	Immediately upon decision to make a change
Approval of changes to product labels and formulas	As incurred	2 to 6 weeks from submitting requested change, varies by certifier and circumstance
Label Use-Up Period ⁴	As incurred	90 days is typical, with a maximum of up to 1 year, subject to certifier decision
Verify organic certificates for all suppliers	Annually	Completed prior to submitting annual renewal paperwork
Commercial availability search updates for non-organic ingredients ⁷	Annually	Completed prior to submitting annual renewal paperwork, some certifiers approval searches up to 18 months
Certifier Audit of Approved Ingredients, Packaging or Processing Aids ⁸	At least every 5 years	Can be more frequent depending on a material's risk for contamination

ACTION ITEMS

- Identify which timelines and deadlines apply to your operation.
- Schedule key dates for submissions and records throughout the year, so that you don't miss them.
- Train your staff to think of communication with your certifier as a continuous process throughout the year, not only an annual event.

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United States Department of Agriculture
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