



Certification Process Overview

Obtaining organic certification as a handler or processor can feel like a daunting task. Understanding the certification process from beginning to end helps ensure a smooth experience. This article details the certification process from application to full certification and introduces the players you will encounter along the way.



What You'll Learn

- The steps to the organic certification process
- The players in the certification process and their roles
- What happens after certification is successfully achieved
- Where to find detailed information on achieving organic certification

The organic certification process is a complex, but very achievable, undertaking. There are several steps that must be completed in order to achieve certified status for your operation. Many hands are involved in the application, review, and determination process. There are also many terms or phrases used in the certification process that may be new to you. Definitions for key terms can be found in the [Glossary of Terms for Organic Certification for Handlers](#).

Let's peek behind the curtain and uncover how the process unfolds and who is involved.

THE PLAYERS

We'll start with the "players," the people or entities who are involved. The organic certification process has three main players and a cast of behind the scenes support staff.

USDA National Organic Program (NOP) - The NOP is the agency within the federal government that administers the USDA organic program. They are responsible for developing and enforcing the regulations, accrediting third-party certifiers, investigating fraud, and maintaining the integrity of the organic seal.

Accredited Certification Body (a.k.a. the "certifier") - The certifier is the entity who is responsible for determining whether an applicant's organic system plan and production practices meet the requirements of the USDA organic regulations. Only entities who have been accredited by the USDA National Organic Program may issue USDA organic certificates.

Inspector - This is the auditor responsible for observing the applicant's organic system plan in action and reporting their observations to the certifier. The inspector is the only role that visits the physical location of the applicant operation. They observe the facility, supplies, ingredients, equipment, and records of the operation and report their observations back to the certifier.

The Operation - That's you! The applicant operation is responsible for writing and implementing an organic system plan that is compliant with the USDA Organic regulations, and applying for certification with an organic certifier.

ROLES AND RESPONSIBILITIES OF CERTIFICATION STAFF

There are many hands that touch an operation's file once an application for certification has been made. These individuals help review and make the certification decision for an applicant. Each certifier assigns these responsibilities among their staff a bit differently, with multiple functions frequently being performed by a single individual.

Initial File Review - This is the first look at the application and supporting document materials submitted by the applying operation. During review, they ensure all required documents and materials are present and determine whether the operation meets the criteria to move forward with the certification process. If there are missing documents or information, or if the reviewer identifies a potentially disqualifying issue, they will let the applicant know and request additional information prior to clearing the application to move forward in the certification process.

Material Input Review - The certifier is responsible for reviewing the list of the material inputs used at the operation, such as ingredients, cleaners, sanitizers, etc., to determine that the substances are allowed in organic handling and production.

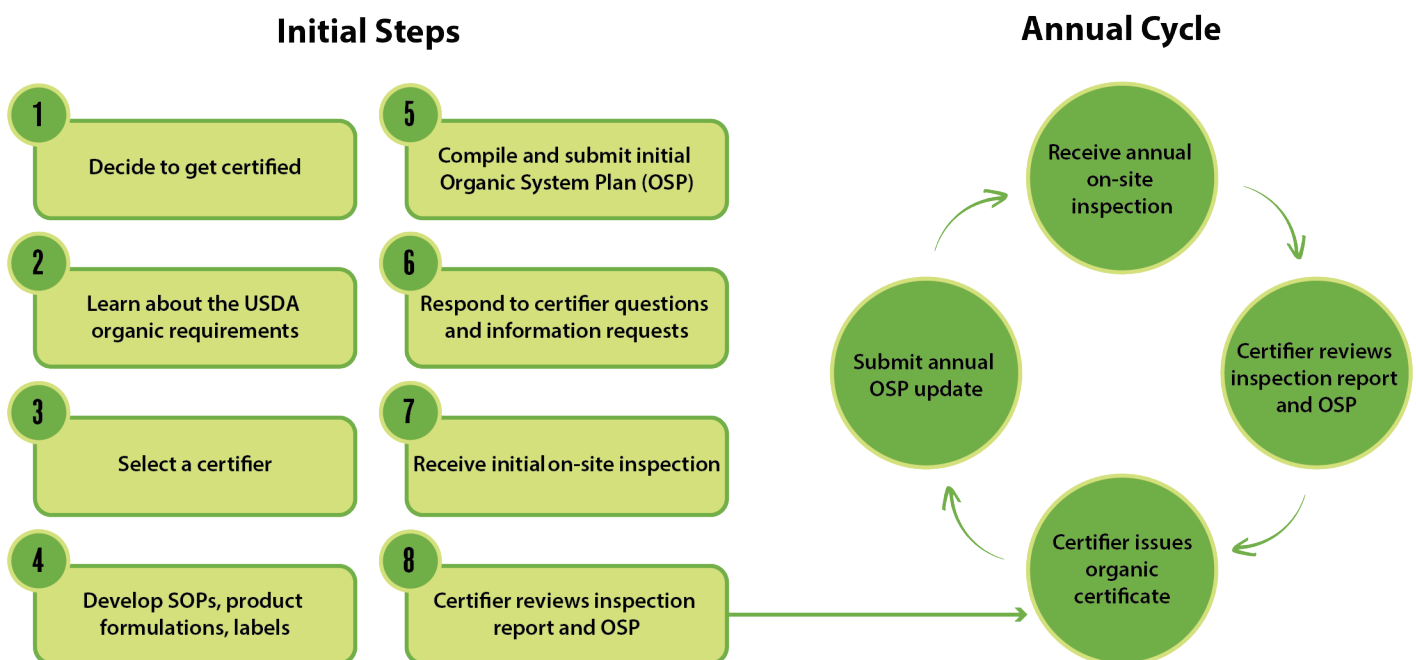
Product Formulation Review - Certification staff review the ingredients, formulation, and production methods of the organic products to ensure that they meet the requirements for organic certification and labeling claims.

Product Labeling Review - The staff also review the layout and content of the product labels, ensuring that labeling claims are accurate, that the organic seal is correctly displayed, and that all required elements of the label are present and correct.

Certification Decision - The certification staff makes the final decision about organic certification. They receive all of the reports and supporting documentation generated by the applicant, inspector, and reviewers. They then determine whether the operation will be granted an organic certificate, whether their certification will continue in future years, as well as issuing any minor issue, noncompliance, or adverse action determination letters.

STEPS TO THE CERTIFICATION PROCESS

Getting certified organic is a multistep process that ensures that you and your product maintain the integrity of the USDA organic seal. Organic certification is an annual cycle. Once you first complete the initial steps and achieve organic certification, you will update your OSP and receive an on-site inspection on an annual basis.



1) Making the decision to pursue organic certification

The first step is to decide that you want to apply for organic certification. There are many reasons that an operation would pursue certification. Whether it is for economic, market, environmental, or personal reasons, everyone should weigh the pros and cons for themselves and their operation before pursuing certification.

2) Selecting a Certifier

Choosing a certifier is a critical step in becoming certified organic. This relationship will make up a large part of the experience of navigating organic certification, and it is important to work with a firm that meets your needs and works with clients in ways that align with your preferences. The NOP maintains a [searchable list of all accredited certifiers](#). Once you have contacted your selected certifier, you will receive their packet of forms that makes up their application and organic system plan. While operations can change certifiers at any point, most operations stay with the same certifier to simplify the annual renewal process and avoid changing product labels.

3) Developing organic SOPs, product formulations, and product labels

The organic system plan (OSP) is a comprehensive set of documents that record how your operation will comply with the USDA organic regulations.¹ Prior to submitting your application for certification, you must write your organic standard operating procedures (SOPs). These may include:

- The location and layout of your organic facility
- How you will keep organic and nonorganic agricultural products separate
- How you will clean and sanitize equipment between organic and nonorganic runs (if you are a split operation)
- How you will manage pests in your facility
- How organic agricultural products will be stored and transported
- The formulation of each organic product including all ingredients
- The design of product labels
- How you will prevent organic fraud in your operation
- Descriptions of recordkeeping systems, including audit traceback (similar to a product recall), and mass balance

The certifier's application forms can sometimes serve as documentation of your standard operating procedures. You can also create documents that work best in your operation or company and provide those to the certifier for review.

4) Completing the application paperwork (the OSP)

Once you have designed your organic operating procedures, you are now ready to complete and submit your initial application for organic certification. You will fill out all required sections of the certifier's application, submit any supporting documentation (such as proposed product labels), and pay the application fee.² First-time applicants can typically submit their initial application at any time in the year.

5) Initial review and follow-up communications

Once the certifier has received your application, they will assign an initial reviewer. The initial reviewer will take a close look through your application to determine that it is complete, all required forms are filled out, supporting documentation is present, and your operation likely meets the requirements of organic certification.³ If the initial reviewer determines that more information is required or that there is missing documentation, the certifier will contact you with a request for more information. The faster you respond, the faster your application moves.

6) The inspection and records audit

After your application has cleared initial review, the certifier will assign an inspector to visit your facility and conduct an on-site inspection.⁴ The inspector's task is to observe how your operation implements its organic system plan and that everything is in compliance with the USDA organic standards.

The inspector will also review your recordkeeping system and perform two tests:

- The **traceback audit**, which ensures that your recordkeeping system is set up in a way that provides sufficient traceability in your supply chain and handling operation.
- The **mass balance audit**, which looks at your inventory management system and tests whether the quantity of organic product that you produced or purchased is appropriate to the quantity that you sold.

At the conclusion of the inspection, your inspector will conduct an **exit interview**. During this time, the inspector will review the findings of the inspection with you, summarizing what was observed, confirming the accuracy of the information provided, and discussing any potential issues that may need clarification or additional documentation. If missing information or documentation is identified, you will have the opportunity to submit the missing pieces to the certifier. After leaving your operation, the inspector will write up a comprehensive **inspection report** of their observations and submit it to the certifier.

7) Final review and determination

When the certification officer receives the inspection report, they can then conduct the final review of your application. The decision officer will look at all documents that you and the inspector submitted to determine whether you meet the requirements for organic certification.^{5,6}

The decision is communicated to you in writing in a **determination letter**. This letter will communicate the organic status of your operation, certified or not certified, and any conditions that are placed on that status. For example, if the inspector was unable to review the label of a sanitizer used on equipment before organic products were run, the letter may grant you organic certification that is conditional on you submitting the input label by a certain date. The letter would also contain any findings of noncompliance and explain your options for resolving the issue. If a noncompliance is given and you feel it's wrong, you can appeal.

8) Receiving your organic certificate

Congratulations on successfully navigating the application process! In addition to your determination letter, your certifier will send you a copy of your organic certificate and certificate addendum. The certificate will list all organic products that you are certified to handle and sell, based on the version of your OSP that is on file with the certifier. Your operation will now be listed in the [Organic Integrity Database](#), along with the operation's contact details, organic status, and list of organic products that you are certified to produce and sell.⁵



HANDLER TIP

Stay on top of communication with your inspector. The more responsive you are, the more efficient and cost effective your inspection process will be. Try to accommodate their proposed inspection dates. This helps keep the process moving and can even save you money if your certifier charges fees for inspector travel because inspectors will often bundle travel for nearby inspections when scheduling allows.



WATCH OUT

It is important to know that the inspector does not make any decisions about your operation's certification status. Decisions are made by a separate individual in the certifier's office. The inspector will look at any and all areas involved in organic handling, such as your production facility, processing equipment, product storage areas, material input storage areas, and transportation equipment.

MAINTAINING ONGOING CERTIFICATION

If you change anything about your operation, you must inform your certifier and submit an update to your organic system plan.⁷ Some examples of changes that require an update to your OSP include product formulation, product label changes, layout of your production facility, and sanitizers used on equipment before it comes in contact with organic agricultural products.

Certain changes may require an additional inspection to verify the compliance of the proposed change, such as moving to a new facility location or adding new production processes. If you decide to add any new products or production processes to your operation, you will need to request an amendment to your certificate before selling those new products.

Organic certification is an annual cycle. You must submit a renewal application during the required window of the year for your certifier. The renewal application is typically a more streamlined process because you are basically just documenting any changes to your operating procedures or proposed changes to your product formulations or product labels. You will undergo an on-site inspection and records audit each year, following all of the same steps outlined above.

GETTING STARTED

Now that you are familiar with the steps of organic certification, you can begin the process to become certified organic. Check out the learning resources below for additional information that may help you on your journey toward organic certification.

ACTION ITEMS

- Explore potential certifiers using the [Organic Integrity Database](#).
- Contact your selected certifier and request OSP paperwork.
- Make a draft timeline for gathering each of the required documents.
- Read the rest of [The Guide to Organic Handling and Processing](#) to learn about the USDA organic requirements for organic handling.
- Start drafting your organic SOPs, product formulations, and labels.
- Submit your application for organic certification.



SOURCES CITED

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2. USDA National Organic Program, [7 CFR §205.401](#).
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United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

