

Guideline No 8 NOP-wild crop harvesting

TS08(NOP)V04en

According to the USDA National Organic Program (NOP)



This guideline does not replace the current Regulation.
It provides some explanations on main requirements for organic Wild crop harvesting.
To know the organic production requirements, it is necessary to download and
carefully read the NOP Regulation available on the USDA website:

<http://www.ams.usda.gov/AMSV1.0/NOP>

I. INTRODUCTION

This abstract summarizes the NOP requirements for wild crop harvesting (§ 205.207, Guidance NOP 5022). Further study of the standard is required for anyone involved in organic production.


As explained in the guideline “NOP Certification process” TS 01 the Organic System Plan/Unit description must include all information explaining how the NOP requirements will be met.


II. ELIGIBILITY




- **WILD CROP** = any plant or portion of a plant that is collected or harvested from a site (terrestrial or aquatic area) that is not maintained under cultivation or other agricultural management. Minimal agricultural practices such as re-seeding from or pruning of existing plants or the removal of non-native species along with the sustainable harvesting of the wild crops may be allowed, otherwise, any other agricultural practices (irrigation, tillage, treatment, introduction of new plants, external seeds, use of shade cloth,...) require certification as a crop but not as wild crop .
- Harvesting products from abandoned farm or orchard does not qualify the products for certification as organic wild crop but as a crop (provided there are documented management practices being employed for at least 3 years before harvesting).
- Both public and private lands are eligible to NOP wild crops certification.
- Products harvested from an area slated for clearing or clear-cutting that is not shown as necessary to improve the natural resources or is detrimental cannot be certified as organic wild crop nor as a crop.



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➤ Eligible species may be plant or other non-animal species, such as mushrooms, kelp or seaweed that are fixed to defined location (by a root, holdfast, mycelial thread, rhizoid or stolon).
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➤ Plants are considered as organic if harvested from a designated area that has had no prohibited substance applied to it or hasn't been contaminated for a period of 3 years immediately preceding the harvest. Relevant verifiable proofs about the history shall be provided to Ecocert: signed and dated affidavit from the private owner in case of private land or waterways, from a responsible authority in case of public lands or waterways.
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➤ Furthermore, the harvesting/ gathering may not be destructive to the environment and must sustain the growth and production of the wild crop. Unmanaged, untrained and uninformed harvesting of wild products without maintaining or improving the natural resources can disqualify the wild products from organic certification

III. ORGANIZATION

Certification of collection of wild plants shall be considered as a project with different actors.

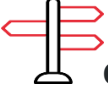
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➤ **Collectors:** individuals not submitted to the control system on their own, who collect wild plants on definite areas under conditions allowing their marketing as organic products and sell them exclusively a Collection center. Simple processing (drying, cleaning) may be done at the collector's home.

Collectors are contracted directly by the Main operator or the Collection center and shall sign a commitment to comply with organic production rules.




If they supply the same plants to different Collection centers that don't belong to the same project, they shall be controlled and certified on their own.

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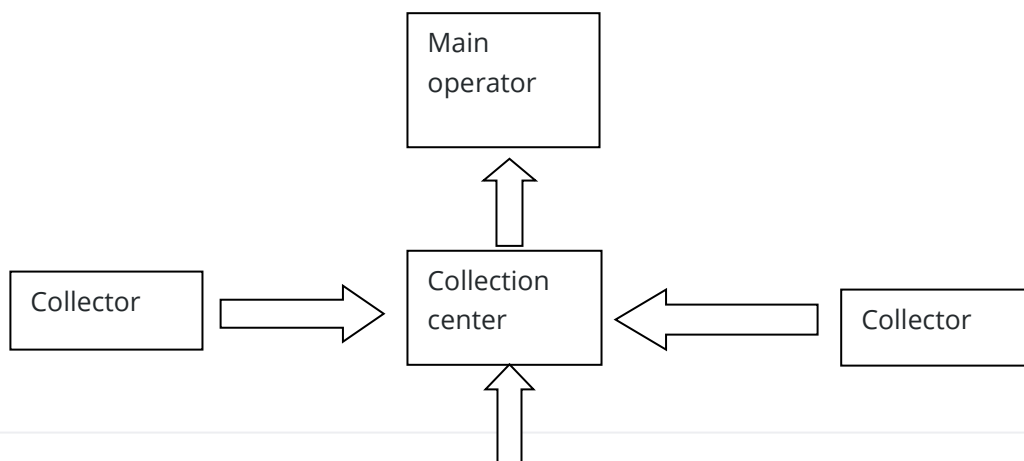
➤ **Collection centers:** buy and gather the plants from the collectors, potentially store and process and then resell them to the Main operator. In general, they belong to the Main operator and are controlled as a second site. If they are independent, they shall be certified on their own and contract with the collectors, they are then responsible for the collection project and considered as suppliers of the Main operator.

If the Collection center is only a broker who connects the collectors and the Main operator (direct sale and delivery from the collectors to the Main operator), he doesn't need to be controlled.

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➤ **Main operator:** company or holding contracted with Ecocert and submitted to the control system that resell and usually export the collected plants, in most cases he is responsible for the project and is the certification owner. He may process, store and/or package the products at its premises or at another controlled site.

For some simple cases of organization, the Collection center and the Main operator are the same entity



Collector

IV. ORGANIC SYSTEM PLAN

Prior to the first inspection, operator responsible for the project must draw out a full description of the project, its unit and operations (including conventional operations located in the same area) by filling in the Organic System Plan. The form shall be updated and sent to Ecocert every year before the following campaign, however any change in the project all along the year (e.g. collection of new plants, new collection areas, change in the list of collectors or collection centers) shall be notified in due time.

Documents to be provided are as follows:

A. Collection areas description

- ▶ Identification and/or codification of the collection areas
- ▶ Localization and details of landscape (mountains, plains, etc.) and type of habitats (forest, fields, meadows, etc.).
- ▶ A chronological description of the collection area, i.e. detailing the specific use allocated to the land or aquatic area and the treatments for the past 3 years (an attestation by a reliable third party in case of public lands or from the private owner in case of private lands confirming the absence of treatment with non-allowed substances on the collection area will have to be provided).
- ▶ Cross contamination risk factor: pesticides or other chemicals, hydrocarbons, heavy metal etc.
- ▶ Plans : surface areas, detailed maps (scale 1:25 000 to 1:50 000) with definition of boundaries of the collection areas (pathway, road sides, hedges, villages), neighboring sources of contamination (industries, motorway, conventional field crop, ...), buffer zones if applicable, sketches of the store houses, transformation facilities and collection



centers. Where in the area, some parts are not eligible for certification (contamination, treatment, protected zone, etc.), they shall be clearly indicated on the map.



B. Collected plants description

- Plant name (local, English, *scientific name*), plant end-use (medical, food, etc.), harvesting dates and plant growth stage at the time of harvesting
- Details on protected varieties and potential ban or restrictions applicable in the collection area (CITES lists, red lists)
- Details on local and national rules on collection, official permit if applicable; name of local authority granting permission, if applicable



C. Preservation measures of the collected plants/sustainable collection management

- List of all plant parts being collected, of plant parts ensuring the recovery that should remain untouched (e.g. 20 to 30% of seeds/fruits)
- Measures taken to ensure long-term stability of the natural habitat during harvesting (e.g. rotation on collection areas), action plan to prevent destructive collection practices,
- Definition of the potential or the area and portion (%) of plants to be collected
- Other simultaneous harvesting operations for the same type of plant in the same location (overexploitation),
- Harvesting methods.



D. Collection organization: collectors' identification and traceability system

- Number of collectors for each area (only mention one harvest worker, when collecting as a family)



- Exhaustive list and potential codification of registered collectors per areas + training attestation.

The list shall be approved by Ecocert before the beginning of the collection campaign. Only listed people may supply organic plants (see model of list in Annex 1).

- List of potential intermediaries: Collection centers (with mention of the responsible person and of the concerned collectors/ center), store houses, processing units.
- Training of collectors on :
- Compliance of the collection within the designated area

Sustainable collection techniques

- Classification and recognition of plants
- Organic production basics
- Measures of identification and no mixing/non contamination by non-allowed inputs during collection, storage, transport or processing.



- **written commitment** from collectors (see model in Annex 2)

Each collector shall sign a contract with the operator responsible for the project in which he commits to:

- Collect only within the designated area
- Collect only the defined plants according to the sustainable collection methods for which he has been trained.
- Not outsource the collection by people not registered by the operator responsible for the project.
- Warn in case of detection of any source of contamination on the collection area
- Not handle the same products in conventional and organic quality
- Work exclusively with the operator responsible for the project for a given type of plants
- Allow audits and sampling by Ecocert and give access to the collection area, stores, and processing facilities.



E. **Documentary accounts**

- ▶ **Purchase register** kept by the Collection center for each plant (see model in Annex 3): date of receipt, identification of the collector and the collection area, quantities, possible lot number
- ▶ Sales documentation (products, quantities, clients, labelling)

V. REQUIREMENTS CONCERNING THE AUDIT

Any collection areas, collection centers, store houses, processing and/or packaging units and the Main operator shall be audited at least once a year. A certain number of collectors are also met and controlled to verify that practices employed during harvest correspond to those documented in the OSP.

The wild crop harvest area shall be audited prior to harvest. It is checked that the species harvested are the intended species and the same as those mentioned on the application and in the OSP.

Audit includes a review of the implementation of crop harvest procedures and training of the collectors.

Border and buffer zones of the collection areas are also audited.

VI. POST-HARVEST HANDLING (§ 205.270 — 205.272)

- ▶ Harvest, transport, and storage of organic products must be done in a manner that avoids commingling with nonorganic products and protects organic products from **contact** with prohibited substances.
- ▶ Special care must be taken not to use or re-use (without thorough cleaning) **packing materials** that has been in contact with substances which might compromise the integrity of organic products

You will find all information about the NOP on the USDA-NOP homepage:

<http://www.ams.usda.gov/AMSV1.0/nop>



In particular, you can find specifications on some topics in the [NOP Program Handbook](#)

You can check yourself the compliance for using an input according the NOP on the OMRI homepage www.omri.org (the Commercial Product list is in free access, the Generic Materials list must be submitted).

You will find more information on **ECOCERT** homepage: www.ecocert.com (certification, certified inputs, other activities)

If you need further information, we are at your disposal for technical questions.

ACT FOR A SUSTAINABLE WORLD



ANNEX 1

COLLECTORS LIST

Collection Area:

Collection Center:

Collection year:

Code	Name	Address	Nb of family members	Date of training



ANNEX 2

CONTRACT TEMPLATE

Important notice: *this is a standard contract to be used as a template. However any other document drafted for contract purpose may also be used by the Project responsible to seal contractual agreements with collectors. In any case, the document should be duly signed by the collector.*

Contract

Between

..... (Collector)

And

..... (manager of the project: Collection center or Main operator)

The Collector hereby commits:

- To collect only within the designated area
- To collect only the defined plants according to the sustainable collection methods for which he has been trained.
- Not to outsource the collection by people not registered by the operator responsible for the project.
- To warn in case of detection of any source of contamination on the collection area
- Not to handle the same products in conventional and organic quality
- To work exclusively with the operator responsible for the project for a given type of plants
- To allow audits and sampling by Ecocert and give access to the collection area, stores and processing facilities.

The manager of the project commits:

To co-ordinate the organic collection of plants project

To co-ordinate the organic inspections

To train the collector on sustainable collection techniques and provide the necessary elements (detailed maps of collection areas, list of defined plants).



Place:

Date:

Collector's name:

Signature:

For (Project manager name)

Signature:



ANNEX 3**PURCHASE REGISTER**

Collection center:

Plant:

Date of receipt	Collector/Code	Collection area	Quantity	Lot number

