

THE ORGANIC PLUS TRUST INC.

Certified Grass-Fed Organic Livestock Program™

Standards for Livestock Production and Handling Operations©¹

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The Program

The Organic Plus Trust LLC (OPT) Certified Grass-Fed Organic Livestock Program™ (“the OPT Grass-Fed Program” or “this Program”) corresponds to, and supplements, the certification requirements of the National Organic Program (“NOP”) for livestock.² As used throughout this Standard, “Organic” means certified Organic under the NOP. To meet the requirements of this Standard, each Livestock Production Operation (“Operation”) must be certified Organic by an NOP-Accredited Certifying Agent (“ACA”). Upon Accreditation by OPT, ACAs are referred to as “OPT Certifiers” in this Standard.

This Standard

The OPT Grass-Fed Organic Livestock Program™ Standards for Livestock Production and Product Handling Operations© is hereinafter referred to as the “OPT Grass-Fed Standard” or “this Standard”.

Only OPT Certifiers can Certify Operations that meet this Standard. Operations that are Certified to this Standard are referred to as “OPT Grass-Fed Certified Operations” or “OPT GF-Certified Operations” or as having “OPT Grass-Fed Certification” throughout this Standard.

This OPT Grass-Fed Program is open to any livestock Production or livestock product Handling Operations, that is presently certified Organic by an ACA under the U.S. Department of Agriculture’s National Organic Program (“NOP”) or eligible to concurrently be certified under the NOP and the OPT Grass-Fed Program.

This Standard sets additional requirements for Organic³ Livestock Production under which each OPT GF-Certified Operation enlarges the duration of the animal’s grazing time to ensure its feed comes solely from foraging, stores Forages and minor amounts of additional plan-based materials and nutrient vitamins and minerals. Unlike the federal NOP Practice Standards, this Standard *excludes* Grain and Grain-derived Feed and Feed products from the diets of livestock. This Standard also sets additional requirements for the Handling and Labeling of OPT GF Certified products.

I. Definitions

Words have the same meaning as in the NOP and appearing at 7 C.F.R. §205.0 unless specifically defined in Appendix A of this Standard. When the word is denoted with an initial capital letter, it is defined in Appendix A of this Standard.

II. Certification of Organic Grass-Fed Production and Handling Operations

A. Eligibility

² See e.g., 7 C.F.R. Part 205 “National Organic Program”

³ As used throughout this Standard, “Organic” mean Certified Organic under the NOP.

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Any Organic Ruminant Livestock Production Operation or Organic Handling Operation certified by an ACA⁴ is eligible to apply for Certification under this Standard. Operations not previously certified as Organic may simultaneously seek Certification under this Standard and the NOP.

B. General OPT Grass-Fed Certification Requirements

Each OPT Grass-Fed applicant Operation shall,

1. Submit a complete OPT Grass-Fed Program Application to an OPT accredited certifier in a form and a procedure set forth in the OPT Grass-Fed Program Manual. The applicant must include proof of current Organic certification by an ACA, or simultaneously apply for Organic certification and OPT Grass-fed Certification.
 - a. Be inspected prior to the OPT Grass-Fed Certification⁵ decision and annually thereafter, and successfully complete any requests for additional information or corrective actions; and
 - b. Demonstrate Livestock products that are to be sold, Labeled or represented as OPT Certified Grass-Fed are USDA-NOP certified organic;
 - i. Certified Organic Dairy animals must complete a 90-day transition for each Organic Dairy animal at the applicant Operation under this Program. Certified Organic Meat animals must be managed under this program from birth.
 - c. Provide Notice of any material change in the status of the Operation or its animals to the OPT Certifier during the OPT GF Certification cycle; and

C. OPT Grass-Fed Certification Term

1. The OPT Grass-Fed Certification term shall be continuous, may run concurrent with the Operation's Organic certification period and include an expiration date no later than fifteen months from the date of issuance. Certification issue date shall resume from the date of expiration of the most recently expiring certificate or start on the date of the Certification decision for initial applicants.

D. OPT Grass-Fed Certification Grant, Surrender, Denial, Suspension, Revocation and Reinstatement and Animal Exclusions under this Standard

1. An operation who surrenders their organic certification will initiate the automatic

⁴ Accredited Certifying Agent (ACA), as defined in the OPT Grass-Fed Program Manual, Appendix A.

⁵ With an exception for OPT to conduct a desk audit per Program Manual section II(E)(2)(a).

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surrender of their OPT Grass-fed certification. An operation who discontinues OPT Grass-Fed management must surrender their OPT Grass-Fed certification.

2. Certification under this Standard may be denied or granted upon OPT Grass-Fed Certification issuance and may thereafter be renewed, suspended, or revoked. Each of these actions is subject to written notice from the OPT Certifier and an opportunity to respond on behalf of the applicant or OPT GF-Certified Operation, in accordance with the applicable procedures set forth in the OPT Grass-Fed Program Manual.
3. Loss of OPT Grass-Fed Certified Status (Animals) – An individual animal loses its Certified status under this Standard if it is determined that during the applicable Certification period the animal,
 - a. Was intentionally fed, or inadvertently received, more than a *De Minimis* amount of non-compliant Feed, Feed product or received healthcare materials prohibited under the NOP or requirements of this Standard; or
 - b. Failed otherwise to meet the ACA’s requirements for Organic certification or requirements of this Standard.

III. Source and Identity of Animals

A. Any ruminant animal placed at an Operation Certified under this Standard shall be:

1. Born at that Operation or an Operation Certified to this Standard and maintained under this Standard throughout its life at that Operation; or
2. Purchased from an Operation presently Certified to this Standard; or
3. If a Dairy animal compliant with paragraphs III (1) or (2) of this section is Commercially Unavailable, according to the definition in Appendix A, an Organic ruminant animal may be purchased from an ACA-certified Organic Operation provided it then completes a 90-day Transition period under this Standard. During this Transition period, the milk of this animal is not eligible to be sold as “Grass-Fed Organic”. Meat animals are not eligible to be considered Commercially Unavailable. These factors are relevant to the decision regarding whether a Dairy ruminant animal is Commercially Unavailable.
 - a. The cost of an animal; and/or
 - b. The cost of the animal’s transportation;

The welfare implications of transportation of the animal.

4. The OPT Certifier shall confirm the Farm Herd List meets the requirements of 7 C.F.R. §205.236 (c) and shall also confirm to a reasonable certainty that non-

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compliant animals are not sold or Labeled as “Certified Grass-Fed Organic” animals.

5. If Dairy Livestock are removed from OPT Grass-fed Management due to substandard health the following shall occur:
 - a. The Certified Operation must document the date the animals were removed from management under these standards and surrender their certification as of that date.
 - b. If the operation intends to re-enter certification, they must submit a plan indicating the following:
 - i. The specific health/welfare concern causing removal from certification.
 - ii. A detailed plan addressing the practices and/or treatments needed to correct the indicated health/welfare concern and approximate time frame for implementation.
 - iii. Submit the above plan for review and approval to the Accredited Certifier.
 - iv. Once the issue has been corrected the Operation may undergo a 90-day transition per standards section II(2)(b)(1)(b)(i).
- B. An animal Certified or Transitioning to this standard may be placed at a certified organic operation not certified to this standard under the following circumstances:
1. Custom grazing of heifers, provided the activity is limited to grazing only, the Certified Operation shall document this occurrence in the Operation’s Application and the custom grazer completes a Custom Grazing Affidavit.
 2. Animals in Transition according to section III(A)(3) may complete their 90-day transition at the certified organic source farm where the animals were purchased when there is risk of inadequate segregation at the OPT Certified Operation, provided:
 - a. The animals have been purchased by the OPT Certified Operation and animal IDs are being tracked according to section III(A)(4).
 - b. The source farm will affirm that no grain is being fed to the transitioning cattle and that transitioning cattle are receiving not less than 60% of their Dry Matter Intake from pasture during the grazing season;

IV. Mandatory Grazing Requirements for Animals Older than Six Months

- A. To maintain OPT Grass-Fed Certification under this Standard, a Certified Operation shall;
1. Graze all animals throughout the entire Grazing Season, which shall be not less than 150 days per calendar year. Due to weather, season, and/or climate the Grazing Season may or may not be continuous; and
 2. Provide not less than 60 percent of each animal’s dry matter intake (“DMI”) from grazing, averaged throughout the Grazing Season.

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V. **Livestock Diet – Allowed, Restricted and Prohibited Feedstuffs**

An animal's diet shall consist solely of Grain-free Forage and Feedstuffs and Supplemental Feedstuffs that are Allowed and/or Restricted under this Standard, as follows.

A. Allowed Feedstuffs

1. Grazed Forages comprised of annual and perennial Grasses, Legumes, Forbs, Brassicas, and Browse; and
2. Grazed vegetative-stage Cereal Grain plants (corn in a pre-tassel stage, soybeans prior to bloom; small and Cereal Grains at or prior to Late Boot Stage); and
3. Harvested Forages and harvested vegetative-stage Cereal Grain crops (corn in a pre-tassel stage, soybeans prior to bloom; small and Cereal Grains at or prior to Late Boot Stage).

B. **Allowed and Unrestricted Grain-Free Supplemental Feedstuffs**

Supplemental Feedstuffs that are allowed by the OPT Grass-Fed Program without restriction are listed in Table 1 of this section. The materials in the table below that are non-synthetic, non-agricultural, and permitted in Organic Production, and required to maintain animal, rumen and nutritional health are allowed under this Program, without limits and fed free choice by the animal, as notated.

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Table 1. ALLOWED & UNRESTRICTED GRAIN-FREE SUPPLEMENTAL FORAGES & FEEDSTUFFS

GRAIN-FREE FEED ADDITIVES & SUPPLEMENTS
NON-SYNTHETIC, NON-AGRICULTURAL INGREDIENTS
ENERGY
Bypass Fat
RUMEN HEALTH
Bypass Choline
Garlic
Herbs
Inulin
Kelp
Vinegar

C. Allowed but Restricted Grain-Free Supplemental Feedstuffs

The materials in Table 2 in this section that are permitted in Organic Production and required to maintain animal health, nutritional stability, and optimal rumen welfare are allowed with restrictions, as notated.

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Table 2. ALLOWED BUT RESTRICTED SUPPLEMENTAL GRAIN-FREE FEEDSTUFFS*

GRAIN-FREE SUPPLEMENT	SUPPLEMENT DRY MATTER PERCENT	MAXIMUM ⁶ ALLOWED PER DAY ON DRY MATTER BASIS (lb)	STARCH %DM	ENERGY M CAL/lb
ENERGY*				
Carrots, Pulp	92%	5	5.74	0.77
Citrus, Pulp	92%	5	1.5	0.84
Concentrated Liquid Lactose		5		
Sugar Cane Dry Sugar	100%	5	0.5	0.98
Sugar Cane Molasses	88%	5	0.5	0.88
Sugar Beets, Pulp	92%	5	0.5	0.73
Sugar Beets, Whole	20%	5	2.5	0.79
<i>*The maximum combined total of all grain free energy supplements in a day shall not surpass 5 lb per day for cattle only. The listed grain free energy supplements are prohibited for sheep and goats.</i>				
STORED FORAGE				
Alfalfa Meal & Pellets ⁷	92%	6 lb or $\leq 0.5\%$ of the animal's body weight, whichever is less	2.0	0.58
Cubed or Pelleted Forage				
Forage Grown in Fodder Sprout Systems		$\leq 1.75\%$ of the animal's body weight not to exceed 20lb; roots must be removed; may not be fed during the Grazing Season		
VITAMINS & MINERALS⁸				
Vitamin & Mineral Supplements/Additives with and without grain carriers	n/a	Unrestricted; per labeled feeding guidelines	n/a	n/a
Vitamin & Mineral Supplements/Additives with grain derived oils	n/a	Unrestricted; per labeled feeding guidelines	n/a	n/a
Silage Inoculants including those containing grain carriers	n/a	Unrestricted; per labeled feeding instructions	n/a	n/a

⁶ Energy Supplement intake values were calculated using approximately 0.5 percent body weight of a 1200 lb ruminant animal.

⁷ Crude protein for alfalfa Pellets is assumed at 18 to 22 percent. Restriction applies to single ingredient only.

⁸ Applicable only to approved materials per Subpart D of the NOP Regulations classified as Livestock Feed Ingredients. All other classifications are unrestricted.

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D. Limited Exceptions to this Standard’s Livestock Diet Composition Requirements

1. Milk for Pre-Weaned Animals - Pre-weaned ruminant animals may be fed milk from Organic animals transitioning to be or that currently are OPT Grass-Fed Certified animals.
2. Temporary Health and Welfare Exception for All Animals - Upon a documented determination by the ACA that an animal’s health is compromised, an Operation may temporarily disregard the volume restrictions on Feedstuffs described Table 2 above, until the animal’s health is restored. A documented finding of substandard health deemed remediable by altering the identity of a Feed ration is one that is:
 - a. Made upon a record maintained or produced by a licensed veterinarian; or
 - b. A determination made by a Responsible Person at the OPT GF-Certified Operation, that is supported by documented indicia of substandard health (e.g., abnormal growth pattern or declining body score, unusual decline in milk Production, and abnormal maternal instincts, etc.), a plan including timeline explaining how the animals health will be restored to a point where the feeding derogation will discontinue, and that is verified by the OPT Certifier at the time of inspection or submission of the documentation by other means.

E. Prohibited Feed, Feeding Practices—Disqualification of Animals

1. Grain Prohibition - All Grains and Grain by-products (including but not limited to corn, soybean, Small Grains, and distiller’s Grain), concentrates, meals, Pelleted feed, and any other non-Forage-based feedstuff not expressly allowed under this Program are prohibited.
2. Disqualification of Animals
 - a. Any animal intentionally fed Feedstuffs disallowed by this Program or that inadvertently receives more than De Minimis amounts of prohibited Feedstuffs or Feed products is permanently disqualified from this Program;
 - b. An OPT GF-Certified Operation is required to notify its OPT Certifier of any occurrence of ingestion of non-compliant Feed by an animal within 10 calendar days.
 - c. The OPT Certifier is required to determine if the animal ingesting non-compliant Feed is disqualified;

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- d. The OPT Certifier must provide to the Certified Operation a written Notice of Disqualification identifying the specific animal disqualified;
- e. The OPT GF-Certified Operation must immediately remove a dairy animal from the Operation following receipt of the Notice of Disqualification and Segregate any disqualified animal products.

F. Variances

Any Variances from the grazing requirements of the NOP may be relied upon by an OPT Grass-Fed Certified Operation under this Standard and OPT GF-Certified Operations may Petition this Program for Variances on grounds specified in the OPT Grass-Fed Program Manual.

VI. Exclusion of Milk and Meat from Disqualified Animals

A disqualified animal and its milk and meat may not be sold, Labeled, or represented as “Certified Grass-Fed Organic” under this Program, and furthermore:

- A. The certifier must be notified of the occurrence. The certifier shall provide a Notice of Disqualification identifying the specific animal(s) disqualified. Dairy animals must be removed from the Operation within 21 days of receiving the Notice of Disqualification.
- B. The disqualified animal or animal product must be Segregated immediately.
- C. Record of Disposition of Excluded Milk—The Operation shall document measures to ensure that a disqualified animal’s milk does not enter the stream of commerce under this OPT Grass-Fed Program.
 1. During the 21-day period following disqualification and before removal of the animal, any milk obtained from the disqualified animal shall be segregated from milk from compliant animals and,
 2. An animal-specific, milk-Segregation log shall be maintained that identifies the disqualified animal(s) and records the amount of milk obtained and the manner by which its Segregation is ensured; and
 3. The milk-Segregation log and a signed statement verifying the removal of the disqualified animal(s) and identifying the recipient of the animals shall be supplied to the OPT Certifier not less than 10 days after the dairy animal has been removed from the OPT GF-Certified Operation.

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VII Livestock Welfare, Healthcare and Living Conditions Requirements

To maintain OPT Grass-Fed Certification under this Standard, an OPT GF-Certified Operation shall comply with all applicable livestock healthcare⁹ and living conditions¹⁰ requirements of the NOP, and with all other relevant provisions of this section.

A. Welfare Practices - The OPT Grass-Fed Program's requirement for additional welfare compliance is met with:

1. valid and current certification to an approved third party animal welfare standard.
 - a. Approved third party animal welfare programs include:
 - i. [Global Animal Partnership \(G.A.P.\)](#)
 - ii. [Certified Humane](#)
 - iii. [American Humane Certified](#); or,
2. by participation in the welfare assessments conducted under the Farmers Assuring Responsible Management (F.A.R.M.) Animal Care Program for milk producing dairy cows. The contours of the existing program are more fully set forth in [FARM's Animal Care Version available](#). Acceptable proof of "FARM Certification" consists of:
 - a. A copy of a current FARM program certificate; or
 - b. A copy of a current FARM Animal Care Evaluation; or
 - c. A current copy of the most recent signed Pledge of Participation

F.A.R.M. is not applicable to Heifer raising operations with no lactating Dairy cattle.

3. An internal animal care protocol developed and monitored by an Aggregator which the certified Operation is under contract. The Aggregator animal care protocol must be approved by the OPT Program. The Accredited Certifier or Aggregator may submit such plan to the OPT Program Director for approval.
 - a. The Certified Operation shall submit an affirmation to its Accredited Certifier indicating the Aggregator which they are under contract. Affirmation template available in Appendix B of the Standards; or,
4. An internal animal care protocol developed by the Certified Operation, approved by the OPT program and verified by a qualified veterinarian. Veterinarian must annually sign an affidavit confirming protocol is actively practiced. See Program Manual section VII(A)(3) for further guidance on compliance to this standard.
 - a. The animal care protocol must include the following parameters:
 - Address overall farm management including personnel involved, sufficient nutrition and feed, hydration, disease/injury prevention and management, physical

⁹ 7 C.F.R. §205.238.

¹⁰ 7 C.F.R. § 205.239.

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alternations, animal handling, environmental and housing risk management, socialization, transport and any special equipment used.

- i. Address the globally recognized [Five Freedoms of Animal Welfare](#).
- ii. Is verifiable through direct observations and scoring measures such as body condition, broken tails, hock & knee lesions, hygiene, locomotion and annual mortality rate scoring.
- iii. Is verifiable through detailed recordkeeping i.e. mortality, culling, treatment records, etc.
- iv. A Veterinarian must interview the farmer, provide direct observation of animals, farm environment and scoring measures and sign off on the affidavit in Appendix C of the Standards.

5. Exemptions to the Welfare Practices verification compliance:

- a. the OPT Grass-Fed Program has granted the following exemption to section VII(A):
 - i. Certified Operations marketing OPT certified products Direct To Consumer only and receiving less than \$350,000¹¹ annual gross sales revenue from sales of total farm products. Eligible operations must sign an affidavit in Appendix D of the Standards that they agree to uphold animal care practices. If a concern arises regarding the welfare of an Operation eligible for this exemption, then the Certifier or OPT has the authority to require one of the animal welfare compliance programs outlined in sections VII(A)(1-4).

B. Healthcare Practices

1. Restricted or prohibited feedstuffs and medications that are necessary to cure a disease, recover from an injury, or improve the health of that animal may not be denied solely to preserve certification under the OPT Grass-Fed Program.

C. Livestock Living Conditions

1. To maintain Certification under this Standard, an OPT GF-Certified Operation shall provide living conditions in accord with its Organic certification under the NOP, provided that, in no case shall an Operation provide bedding to livestock

¹¹ Small Farm as defined by the [USDA Economic Research Service \(ERS\)](#) is a farm with gross cash farm income (GCFI) including income from commodity cash receipts, farm-related income, and Government payments.
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that includes Feed products prohibited under this Standard.

VIII Pasture Management Plan

Each OPT Grass-Fed Certified Operation must submit and maintain a Pasture Management Plan that meets all applicable requirements of the NOP and includes practices that,

- A. Comply with part IV of this Standard
- B. Allow for pasture rest and regrowth
- C. Prevent Overgrazing

IX Recordkeeping – Production and Handling Operations

A. Livestock Production Operation Recordkeeping Requirements

1. OPT Grass-Fed Certified Livestock Production Operations must maintain and possess current records demonstrating the Production and Handling of products that are intended to be sold, Labeled, or represented as “Certified Grass-Fed Organic” are in full compliance with this Standard. The specific provisions governing recordkeeping are more fully explained in the OPT Grass-Fed Program Manual.

B. Handling Operation Recordkeeping Requirements

1. OPT Grass-Fed Certified Handling Operations must maintain and possess current records demonstrating the Handling of Certified products that are intended to be sold, Labeled, or represented as “Certified Grass-Fed Organic” are in full compliance with this Standard. The specific provisions governing recordkeeping are more fully set forth in the OPT Grass-Fed Program Manual.

C. Recordkeeping Requirements for Split and Parallel -Operations

1. A Split and/or Parallel Operation must be acknowledged by the OPT Certifier and approved by the verification of a written Segregation policy describing how OPT Grass-Fed Certified products are Segregated from non-OPT GF-Certified products. Dairy animals of the same species are not eligible for Parallel Operation. An OPT Grass-Fed Certified Livestock Production or Handling Operation must maintain and possess current records concerning animals or products that are in Production at the Operation but that are not compliant with the OPT Grass-Fed Program to demonstrate that they have not been sold, Labeled, or represented as “Certified Grass-Fed Organic.”

X Handling of OPT Grass-Fed Certified Products

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Any Handling Operation, or portion thereof, that handles agricultural products that are OPT Grass-Fed Certified under this Standard shall maintain a Handling System Plan and a standard operating procedure that sets forth the practices by which products Certified to this Standard are properly handled, Segregated, and not commingled with products not Certified to this Standard.

XI Composition and Labeling of OPT Grass-Fed Certified Products

A. Labeling

Single and Multi-Ingredient agricultural products that are OPT Grass-Fed Certified to this Standard shall be Labeled “OPT Grass-Fed Organic Certified by [Certifier]” or a similar phrase, to acknowledge that the farm or ranch is the entity that is OPT Grass-Fed Certified.

OPT GF-Certified Operations must submit all Labels and packaging to the OPT Certifier for review and approval. Labeling must be in general accord with the compositional percentages and labeling requirements of the NOP described in 7 C.F.R. §205, Subpart D, and the labeling guidance set forth in the OPT Grass-Fed Program Manual, provided that,

B. Composition of Multi-Ingredient Products (Prohibition on Mixing)

Mixing “Certified Grass-Fed Organic” ingredients, that are eligible under section II(A) for certification under this standard, in a multi-ingredient product with ingredients not OPT Grass-Fed Certified is prohibited. Ingredients not Eligible to be certified to this standard are exempt from certification to this standard.

Multi-ingredient products containing Livestock ingredients from OPT Grass-Fed Certified Operations shall be Handled exclusively by OPT Grass-Fed Certified Operations that process and should be Labeled in accordance with the Labeling content classification system used in the NOP. The placement of the Labeling language outlined in section XI(A) shall be applied analogously to the use of the word “Organic” under the NOP¹². The phrases noted in section XI(A) above should generally be used like the word “Organic” under the NOP regulations. They appear as modifiers of the OPT Grass-Fed Certified Operation’s name or the product’s compliant ingredients.

C. Bulk, Nonretail Containers and Direct Sale Products

All products from OPT GF-Certified Operations, whether single or multi-ingredient that are marketed in bulk or bulk packaging shall:

1. Be produced *and* Handled in accordance with the OPT Grass-Fed Organic

¹² See 7 C.F.R. §§301-305.

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Standards and Program Manual; and

2. Bear the phrase noted in Section XI(A) for packaged and/or labeled bulk items.
3. Nonretail Containers used only to ship or store raw or processed agricultural product must bear the phrase noted in Section XI(A) on recordkeeping documents accompanying the nonretail containers.

XII Mandatory Use of This Program’s Seal

Agricultural products in packages described in the NOP at 7 C.F.R. §205.301 and §205.307 shall bear the seal of this Program (“OPT Grass-Fed Organic Seal”) and may bear the seal of the applicable OPT Certifier, or otherwise identify the OPT Certifier, and in accord with the terms set forth in the OPT Grass-Fed Program Manual.

- A. All OPT Grass-Fed Certified Operations utilizing the OPT Grass-Fed Organic Seal and Claim must enter into a licensing agreement with OPT.
- B. A fee for use of the OPT Grass-Fed Organic Seal shall be assessed and collected directly by OPT from each OPT GF-Certified Operation that uses the Seal on product packaging, Labeling or point of sale information. An exception to this requirement is made for OPT GF-Certified Production Operations that receive less than \$20,000 a year gross sales revenue from sales of products certified to this Standard.
- C. The OPT Grass-Fed Program Manager may suspend or revoke any licensing agreement but shall do so directly with the counterparty and without intervention of the OPT Certifier. Such suspension of Seal usage will not immediately affect the OPT GF Certification of the Operation. Once Seal usage is suspended, an operation surrenders or has their certificate revoked, products cannot be marketed or sold as OPT Grassfed Organic.
- D. Each OPT Certifier is required to report whether or not an Operation will be using the OPT Grass-Fed Organic Seal OPT Certifiers must report any misuse of the Seal that they observe during the OPT GF Certification term.

XIII Administrative Matters – OPT Certifier Accreditation, Compliance Matters, Complaints, Appeals, Petitions, and Governance

The following subjects are treated in full in the OPT Grass-Fed Program Manual:

- A. OPT Accreditation of ACAs.

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- B. OPT Grass-Fed Program compliance, complaints, and Adverse Action appeals.
- C. Procedure for Segregating disqualified animals.
- D. Amendments to Existing Standards— Any OPT GF-Certified Operation may participate in the Standards development process outlined in Section VII(A) of Appendix D of the Program Manual.
- E. Governance of the OPT Grass-Fed Livestock Production and Handling Standards development.

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Appendix A

DEFINITIONS

The terms and their definitions below either appear at 7 C.F.R. §205.2 (as denoted by “(NOP)”) or are terms and definitions derived by the OPT Certified Grass-Fed Organic Livestock Program (“Grass-Fed Program”). The list of NOP definitions is not exhaustive but rather a handful of terms that are most often used by The GF Program. The NOP definitions in 7 C.F.R. §205.2 apply to each Application of the OPT Grass-Fed Program Standards and governance requirements imposed on or by OPT Certifiers, unless specified otherwise herein.

1. **Accredited Certifying Agent** (“ACA”). An entity that is accredited by the USDA National Organic Program.¹³
2. **Accreditation**. A determination made by OPT that an ACA is eligible, competent, and presently capable of performing Certification Services under the terms and conditions of the OPT Certified Grass-Fed Organic Livestock Program Materials, and the OPT Ancillary Materials, and may in some instances refer to the ACA’s status with the NOP.
3. **Adverse Action**. A Noncompliance decision that adversely affects [Organic] Certification, Accreditation, or a person subject to the [NOP], including a proposed suspension or revocation; a denial of Certification, Accreditation, or reinstatement; a cease-and-desist Notice; or a civil penalty. (NOP)
4. **Aggregator**. An agricultural business or cooperative of growers that consolidates, markets and/or distributes agricultural products.¹⁴
5. **Application**. A document submitted to an OPT Certifier by an Operation that contains information regarding the applicant Operation that initiates the process for determining OPT GF Certification and is sufficient for an OPT Certifier to conclude the Operation is eligible under the OPT GF Program.
6. **Boot Stage**. Part of the flowering phase of plant growth, defined as the time when the seed head emerges from the sheath of the flag leaf. See figures A and B in section V(C) of the Program Manual.
7. **Brassicas**. A genus of plants in the mustard family (*Brassicaceae*). The members of the genus are informally known as cruciferous or mustard plants. Brassica forages include rape, turnips, etc.

¹³ <https://www.ams.usda.gov/services/Organic-Certification/certifying-agents>

¹⁴ Definition based on the National Center for Appropriate Technology (NCAT) [Tips for selling to Aggregators/Grower Marketing Coops](#).

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8. **Browse.** A leaf and twig growth of shrubs, woody vines, trees, cacti, and other non-herbaceous vegetation available for animal consumption. **Carrier.** An edible material to which ingredients are added to facilitate uniform incorporation of the latter into Feeds. The active particles are absorbed, impregnated, or coated into or onto the edible material in such a way as to physically carry the active ingredient.¹⁵
9. **Certificate of Compliance.** A document developed by OPT that identifies an OPT GF-Certified Operation and that may contain marks of the OPT Certifier, if approved by OPT.
10. **Certification.** An annual determination by an OPT Certifier that an eligible Operation is in present compliance with the requirements appearing in the OPT Grass-Fed Program Materials and applicable OPT Ancillary Materials for dairy or meat Livestock and is reasonably certain to remain in compliance during the twelve-month period designated on the OPT GF Certificate of Compliance.
11. **Certifier Update Memorandum.** The document issued by the Program Manager to formalize decisions made by the Steering Committee with regard to changes to or clarifications of the OPT Grass-Fed Program Manual or Standards.
12. **Certification Service Materials.** The Applications, forms, templates, checklists, inspection documents, electronic data generating and storing methods, used in providing Certification Services, that are produced by an OPT Certifier and approved for use by OPT.
13. **Certification Services.** The activities conducted by the OPT Certifier to render a Certification.
14. **Commercially Unavailable.** A Grass-Fed Organic dairy animal is Commercially Unavailable for purchase whenever an Operation Certified to this Standard demonstrates to the OPT Certifier that it cannot timely obtain an animal with the Operation's Animal Attributes. OPT GF-Certified Operations may properly consider the cost of an animal and its transportation cost separately when choosing the source of the replacement animals. The welfare implications of transportation of animal is a separate factor that may be also taken into account.
15. **Confidential Information.** All information acquired by the OPT Certifier or Program Manager in the performance of Accreditation or delivery of Certification Services that is required by the NOP to be maintained as confidential, excluding information that is required to be disclosed to NOP.

¹⁵ AAFCO 2012 Official Publication; definition referenced by NOP.
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16. **Continuous Certification.** No lapse in Certification once the Operation has entered the Program. Ex. A certificate is issued effective May 5, 2021 and expires May 4, 2022. The renewal certificate for the subsequent Certification period should begin May 5, 2022 and expire May 4, 2023.
17. **Dairy Livestock Production Operation.** An OPT GF-Certified Operation with a milking parlor where at least one lactating animal is milked.
18. **De Minimis.** An amount or action that is below the threshold of programmatic concern.
19. **Direct to Consumer.** A Certified Operation marketing all farm products directly to the end user, including but not limited to sales at farmers markets, On farm or roadside store/stands, pick your own, Community Supported Agricultures (CSA), and online sales.¹⁶
20. **Dry Matter Intake.** Total pounds of all Feed, devoid of all moisture, consumed by a class of animals over a given period of time. (NOP)¹⁷
21. **Exceptional Circumstances.** Those circumstances that generally constitute force majeure, such as including but not limited to, acts of God, compliance with law, storm, flood, terrorism, earthquake, war, rebellion, revolution or strike or any other event, happening or occurrence beyond the reasonable control of the affected party.
22. **Farm Herd List.** A list of all ruminant animals at the OPT GF-Certified Operation that is routinely updated.
23. **Feed.** Edible materials which are consumed by Livestock for their nutritional value. Feed may be concentrates (Grains) or roughages (hay, silage, fodder). The term, “Feed,” encompasses all agricultural commodities, including Pasture ingested by Livestock for nutritional purposes. (NOP)
24. **Feed Additive.** A substance added to Feed in micro quantities to fulfill a specific nutritional need (i.e., essential nutrients in the form of amino acids, vitamins, and minerals). (NOP)
25. **Feed Supplement.** A combination of Feed nutrients added to Livestock Feed to improve the nutrient balance or performance of the total ration and intended to be: (1) Diluted with other Feeds when fed to Livestock; (2) Offered free choice with other parts of the ration if separately available; or (3) Further diluted and mixed to produce a complete Feed. (NOP)
26. **Feedstuffs.** Any of the constituent nutrients of an animal ration.

¹⁶ As defined by the National Agriculture Statistics Service (NASS) 2017 Census of Agriculture results from the 2020 Local Food Marketing Practices Survey report.

¹⁷ All definitions derived from 7 C.F.R. §205.2 are denoted by “(NOP).”

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27. **Forage.** Vegetative plant material in a fresh, dried, or ensiled state (Pasture, hay, or silage), which is fed to Livestock. (NOP)
28. **Forage Cubes or Pellets.** Desiccated and compressed Forages.
29. **Forbs.** Flowering plants that are not Grasses or sedges. Some examples include clovers, alfalfa, and milkweed.
30. **Good Cause.** A good faith attempt to complete a required action in a timely manner failed, enlargement of time is appropriate to serve fundamental fairness and such enlargement will not substantially impair the interests of the OPT Certified Grass-Fed Organic Livestock Program.
31. **Grain.** The reproductive parts of plants, including legumes, monocotyledons and dicotyledons.
32. **Grass(es).** Plants species that are classified withing the Poacea plant family.
33. **Grazing Season.** The period of time when Pasture is available for grazing, due to natural precipitation or irrigation. Grazing Season dates may vary because of mid-summer heat/humidity, significant precipitation events, floods, hurricanes, droughts, or winter weather events. Grazing Season may be extended by the grazing of residual Forage as agreed in the Operation's Organic System Plan. Due to weather, season, or climate, the Grazing Season may or may not be continuous. (NOP) *Under the OPT Certified Grass-Fed Organic Livestock Program, the Grazing Season may range from 150 days to 365 days per year but is not less than 150 days per year.*
34. **Handler.** Any person engaged in the business of Handling OPT certified products, including Producers who Handle crops or Livestock of their own Production, except such term shall not include final retailers of OPT certified products that do not process OPT certified products.
35. **Handle or Handling.** To sell, process, or package OPT certified products, including but not limited to trading, facilitating sale or trade on behalf of a seller or oneself, importing to the United States, exporting for sale in the United States, combining, aggregating, culling, conditioning, treating, packing, containerizing, repackaging, labeling, storing, receiving, or loading. (NOP)
36. **Label.** A display of written, printed, or graphic material on the immediate container of an agricultural product or any such material affixed to any agricultural product or affixed to a bulk container containing an agricultural product, except for package liners or a display of

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written, printed, or graphic material which contains only information about the weight of the product.

37. **Late Boot Stage.** When the seed head has reached Boot Stage and is visible outside of the sheath, but the seed stalks have not yet begun to flower. See figure C in section II(C) of the Program manual.
38. **Legumes.** Plants of the Fabacea family, many of which are recognized for their ability to fix atmospheric nitrogen in the soil.
39. **Licensed Trademarks.** The name(s), logo(s) and service mark(s) owned and used by OPT that are referred to in Section XIV of the OPT Grass-Fed Program Manual.
40. **Livestock.** Any cattle, sheep, goats, swine, poultry, or equine animals used for food or in the Production of food, fiber, Feed, or other agricultural-based consumer products; wild or domesticated game; or other non-plant life, except such term shall not include aquatic animals for the Production of food, fiber, Feed, or other agricultural-based consumer products. (NOP)
41. **Livestock Diet.** Feed grown or developed for the consumption of livestock.
42. **Meat Livestock Production Operation.** An Operation that raises OPT Grass-Fed Certified Livestock under the requirements of the Certified Grass-Fed Organic Meat Standard.
43. **Noncompliance.** Any action or inaction or lack of records that demonstrates that an Operation is not in compliance with the OPT Grass-Fed Program.
44. **Nonretail container.** Any container used for shipping or storage of an agricultural product that is not used in the retail display or sale of the product.
45. **Non-Routine.** Actions performed in managing a Livestock Operation that are not conducted on a regular basis or in a fixed order.
46. **Notice of Disqualification.** The way in which an OPT Grass-Fed Certified Operation receives the decision by an OPT Certifier that the Operation is not eligible to sell, represent, or Label its Livestock products as Certified under the OPT Grass-Fed Program.
47. **NOP Accreditation.** A determination made by the Secretary of Agriculture that authorizes a private, foreign, or State entity to conduct Certification activities as an ACA under the NOP Organic Regulations. (NOP)
48. **NOP Practice Standard.** The guidelines and requirements through which a Production or Handling Operation implements a required component of its Production or Handling OSP. A Practice Standard includes a series of allowed and prohibited actions, materials, and

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conditions to establish a minimum level performance for planning, conducting, and maintaining a function, such as Livestock health care or facility pest management, essential to an Organic Operation. (NOP)

49. **Notice.** Information sufficient to ensure the party receiving it has actual knowledge of a requirement or duty.
50. **On-Site Inspection.** A visit to an Operation by an authorized and qualified inspector commissioned by an OPT Certifier as part of the initial or renewed Certification process or in cases of suspected or actual Noncompliance that OPT requires an OPT Certifier to conduct.
51. **Operation.** A Producer engaging in Organic Production or an Organic Handler operating a Handling Operation as defined in 7 C.F.R. §205.2. and that seeks Certification under the OPT Grass-Fed Program.
52. **Operation Report.** Information relating to a single Organic Operation that includes but is not limited to Applications, inspection reports, Certification checklists, reviewer or review committee scoresheets, non-conformances, remediative actions and other data typically used or deemed necessary to substantiate an ACA's Organic Certification decision in accordance with the standards applicable to such decisions under 7 C.F.R. Part 205.
53. **Operation's Animal Attributes.** A list of attributes of the animals at the Operation that are set forth in the Application and may include but is not limited to, breed, age, health, replacement transport time, body score, disease/illness profile, source location, and history.
54. **OPT Ancillary Materials.** All materials or methods developed or used by OPT to accredit an ACA to administratively manage the OPT Grass-Fed Program, including the OPT GF Certificate of Compliance, and any related Applications, forms, checklists, and data submission templates prepared by OPT that assist OPT Certifier in performing Certification Services including those materials to designate and authorize the use and cessation of use of OPT's Licensed Trademarks.
55. **OPT Grass-Fed Certified Operation.** A Producer engaging in Organic Production or a Handler operating a Handling Operation as defined in 7 C.F.R. §205.2. that has received OPT Grass-Fed Certification and is presently in good standing.
56. **OPT Certifier.** An ACA that has received Accreditation from OPT and is authorized to conduct Certification Services on OPT's behalf.
57. **OPT GF Program.** Short for OPT Certified Grass-Fed Organic Livestock Program, including the current OPT Grass-Fed Dairy or Meat Standards.

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58. **OPT Grass-Fed Program Manual.** An annually released document that guides parties in implementing, applying, and complying with the current requirements of the OPT GF Program.
59. **OPT Grass-Fed Program Materials.** The current Livestock Production and Handling Standards and OPT Grass-Fed Program Manual together.
60. **OPT's Intellectual Property.** All intellectual and industrial property rights associated with or comprised in the OPT Grass-Fed Program Materials and Ancillary Materials as defined herein, including but not limited to all written works, training materials, manuals, instructions, protocols, designs, illustrations, photographs, inventions, trade secrets, ideas, know-how, concepts, methods, and data gathering and assessment techniques.
61. **Organic.** Meaning the same as that set forth in 7 C.F.R. §205.2.
62. **Organic System Plan ("OSP").** A plan of management of an Organic Production or Handling Operation that has been agreed to by the Producer or Handler and the ACA and that includes written plans concerning all aspects of agricultural Production or Handling described in the [NOP Organic Regulations]. (NOP)
63. **Overgrazing.** Failure to move or rotate animals in harmony with forage growth, causing damage to grassland and soil.
64. **Parallel Production.** The simultaneous production, preparation, or handling of OPT Grass-fed and non-OPT Grass-fed livestock and/or products of the same or similar visually indistinguishable commodities.
65. **Pasture.** Land used for Livestock grazing that is managed to provide Feed value and maintain or improve soil, water, and vegetative resources. (NOP)
66. **Petition.** A written request to amend the OPT GF Organic standards, PM or Variances that is submitted materially by any OPT GF-Certified Operation in accordance with the Program Manual.
67. **Production.** The business of growing or producing food, fiber, Feed, and other agricultural-based consumer products.
68. **Processing.** Cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container. (NOP)
69. **Producer.** A person who engages in the business of growing or producing food, fiber, Feed, and other agricultural-based consumer products. (NOP)

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70. **Program Manager.** An independent, contracted professional entity that develops and implements the current OPT Certified Grass-Fed Organic Livestock Program Materials and Ancillary Materials.
71. **Replacement Heifer.** A heifer that has been selected to be bred and placed in the milk herd.
72. **Responsible Person.** The individual that controls, manages, or directs the Operation's management practices.
73. **Segregation.** Physical and/or individually identifiable separation of OPT GF-certified animals or products.
74. **Small Grains/Cereal.** Grasses that are cultivated for their edible Grain such as wheat, millet, rice, barley, oats, rye, triticale, and sorghum.
75. **Split Operation.** An Operation that produces or handles both OPT Grass-Fed Certified and non-OPT certified products.
76. **Supplemental Feedstuff.** Nutrients provided in Feedstuff form that Optimize energy, nutrition, and health of an OPT Grass-Fed Certified animal.
77. **Transition.** A 90-day period of time during which an applicant dairy Operation complies with the OPT Grass-Fed Program but has not yet received OPT GF Certification; this term may be applied to a particular animal as well as to the Operation.
78. **Variance.** An OPT decision to relax the Application of an OPT Grass-Fed Program requirement or temporarily except an Operation from a particular requirement.
79. **Web Portal.** The webpages on the OPT website through which OPT Certifiers can submit documentation to the Program Manager and issue Certificates online.

Appendix B

Aggregator Affirmation

See OPT Grass-Fed Organic Livestock Program Standards section VII(A)(2)

Aggregator. An agricultural business or cooperative of growers that consolidates, markets and/or distributes agricultural products.

Your milk cooperative, pooler or handler could be considered an Aggregator

At this time the Aggregator Internal Animal Care Protocols that have been approved by the OPT Program are:

- Organic Valley’s Dairy Animal Care Standard
- Maple Hill Creamery’s Animal Care protocol
- Family Farmstead Creamery

Any protocols not listed above can be submitted to admin@organicplustrust.com for review.

Date_____

Farm Name_____

Main Contact_____

Aggregator_____

Contract start/end date, if known_____

I affirm that I am affiliated with the Aggregator listed above and if this changes I will notify my Certifier.

Signature_____

PLEASE SUBMIT THIS COMPLETED FORM TO YOUR OPT/ORGANIC CERTIFIER

Appendix C

Veterinarian Affidavit

See OPT Grass-Fed Organic Livestock Program Standards section VII(A)(4)

A Certified Operation’s OPT APPROVED Animal Care Protocol must be verified by a qualified Veterinarian. Veterinarian must annually conduct an onsite evaluation verifying that the Certified Operation is managing to the approved protocol and sign this Affidavit.

Certified Operation Name _____

Date of Onsite Veterinarian Evaluation _____

Veterinarian Affidavit:

1. I have read the OPT approved Animal Care Protocol developed by the Certified Operation.
2. I visited the Certified Operation and interviewed the owner and/or any other responsible parties to ensure they are managing to the OPT Approved Animal Care Protocol.
3. Management reflects the globally recognized 5 Freedoms of Animal Welfare.
4. I conducted an onsite evaluation of the Certified Operation’s barns, pastures, animals and verified sufficient nutrition and feed, hydration, disease/injury prevention and management, adequate physical alternations, animal handling, environmental and housing risk management, socialization are handled as stated in the Animal Care Protocol and are conducted in a manner that promotes animal welfare.
5. I have conducted scoring measures such as body condition, broken tails, hock & knee lesions, hygiene, locomotion and annual mortality rate scoring and found all to be sufficient.
6. I have reviewed applicable records such as mortality , culling, injury and medication treatment records.

Areas of improvement were discussed, and the Certified Operation agrees to implement. ____
Yes (briefly explain below) ____ N/A

Veterinarian Name _____

Signature _____ **Date** _____

Email _____ **Phone** _____

Appendix D

Exemption to Animal Welfare Compliance Affidavit

See OPT Grass-Fed Organic Livestock Program Standards section VII(A)(5)

Direct to Consumer. A certified operation marketing all farm products directly to the end user, including but not limited to sales at farmers markets, On farm or roadside store/stands, Pick your own, Community Supported Agricultures (CSA), and online sales.

Standards section VII(A)(4) indicates the following exemption to the Welfare Practices Verification Compliance noted in Section VII(A):

Certified Operations marketing products Direct To Consumer only and receiving less than \$350,000* annual gross sales revenue from sales of total farm products. Eligible operations must sign an affidavit in Appendix D of the Standards that they agree to uphold animal care practices.

*Figure comes from the definition of Small Farm by the [USDA Economic Research Service \(ERS\)](#) is a farm with gross cash farm income (GCFI) including income from commodity cash receipts, farm-related income, and Government payments.

Date _____

Farm Name _____

Main Contact _____

I affirm that I am a Direct To Consumer and Small Farm operation. Myself and all other responsible parties ensure animal care practices as recommended by the FARM program are met. If my status changes I will notify my Certifier.

Signature _____

PLEASE SUBMIT THIS COMPLETED FORM TO YOUR OPT/ORGANIC CERTIFIER