Real Organic Project Standards
These standards include the changes made during the Real Organic Project's December 2025 Standards Board meeting.

Standards for Whole Farm Certification
Standards for Grown in the Ground
Standards for Soil Management
Standards for Greenhouse Production
Standards for Origin of Livestock
Standards for Grazing of Ruminant Animals
Standards for Animal Welfare
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Appendix

Real Organic Project Standards for Whole Farm Certification
ROP is a whole farm certification program. This means that all aspects of commercial production are reviewed and inspected, and no prohibited practices, as outlined in 4a-h below, are allowed.

1. Definition of a Whole farm
   For the purposes of Real Organic Project certification a farm should be considered, in its entirety, to include ownership or management of all enterprises on all owned or leased properties. Distinct farm operations and/or enterprises that share a substantial portion of labor, land base, equipment and/or management will be considered to be under common ownership or management. Any farm involved in Hydroponic or CAFO production shall be barred from Real Organic Project certification. This definition of a farm does not apply to land trusts, formal farm incubator programs or nonprofits that provide land access to farmers as a core mission. The specific farm enterprise reviewed by Real Organic Certification would need to meet Real Organic Project standards, but other enterprises within the above listed entities would not.

2. Definition of a Split Farm
   For the purpose of Real Organic Project Certification, a split farm is defined as a farm operation with any amount of non-certified organic production.

3. Statement of Intent
   Real Organic Project's long term goal is for farms to become 100% certified organic. We strongly encourage farmers to develop strategies to remove barriers towards 100% organic certification. The Standards for Whole Farm Certification create a viable path to certification for diversified operations that choose to have certain portions of their farm certified organic while choosing not to certify other enterprises.

4. Prohibited Practices on Split Farms
    a. No systemic confinement of livestock. Farms operating confinement production of livestock (AFOs) are not eligible for Real Organic Project certification. Confinement production is defined as operations where, regardless of size of operation or species of animals, livestock are confined to indoor and/or outdoor environments where they cannot express their natural behavior for the majority of their life cycle. Real Organic Project Standards for Grazing of Ruminant Animals Part 4 may act as an exemption to this standard at the discretion of the program administrator.

    b. No use of preventative antibiotics in livestock

    c. No hydroponic production

    d. No use of prohibited synthetic herbicides, pesticides, fertilizers in crop production or excluded methods as defined by the NOP and the NOSB.[1]

    e. Not managing all ornamental/bedding plants organically while on farm

    f. No simultaneous parallel production of certified organic and non-certified organic productions within the following categories:
        i. Vegetables and small fruit (including berries)
        ii. Microgreens
        iii. Tree fruit
        iv. Tree nuts
        v. Tree sap/syrup
        vi. Hay and pasture
        vii. Grain and pulses
        viii. Fiber from the same species
        ix. Dairy from the same species
        x. Eggs from the same species
        xi. Meat and byproducts from the same species

    g. No production practices that could reasonably present a risk to organic integrity

    h. Earning over 49% of gross farm income (defined as income from raising crops or livestock) from non-certified organic products.

5. Allowed Practices on Split Farms
    a. Production from buffer strips required for organic certification does not count as parallel production.

    b. Production from transitional land does not count as parallel production.

    c. Exemptions are allowed for animals that are raised according to Real Organic Project standards but are not slaughtered in a USDA organic facility. Farms that sell more than 50% of gross income as “NOT CERTIFIED ORGANIC” due to

meat sales coming from a non-organic slaughterhouse are still eligible for Real Organic Project certification for products that otherwise qualify.

d. In instances in which the farm operation shares resources with their multigenerational family farm, if certain criteria are met, the program director, at their sole discretion, reserves the right to review farm ownership and/or lease agreements, shared labor, and shared equipment to ensure there is a low likelihood of organic integrity issues related to farming practices. The proposed criteria are as follows: the farm operation is its own distinct entity, with a distinct NOP ID#, a distinct name, and with separate marketing, gross sales, and tax filings.

6. Transitional Organic
    a. Real Organic Project certification of transitional production will not be allowed. Farms with land, crops or livestock undergoing bona fide 3-year transition to certified organic will remain eligible for Real Organic Project certification of their NOP production as long as the transitional land is managed according to Real Organic Project standards as well. [For purposes of calculating the 49% exemption, sales of transitional products will be counted towards total farm revenue but will not count towards the 49% exemption.]

    b. Land must not be rotated in and out of organic certification. An individual plot of land may only be transitioned once into organic certification without approval of the Real Organic Project standards board.

Real Organic Project Standards for Grown in the Ground

1. Statement of Intent
   Organic crops are grown in the soil, in the ground. Organic terrestrial plant production must be a soil-based system in which plant roots grow in healthy, living soil. Biological activity, essential for healthy crops, must be supported by sound soil stewardship. Soil management must maintain or improve soil organic matter content and must select and implement stewardship practices that maintain or improve the physical, chemical and biological condition of the soil and minimize soil erosion. Importantly, soil must provide the significant majority of nourishment for plants.

2. Connection to Subsoil
   Organic terrestrial crops must be produced in-the-soil in-the-ground with plant roots in living soil, or in living soil mixed or fertilized with materials and products allowed in organic production, in connection with the subsoil and bedrock. Aquatic plants, such as water cress which naturally grow in water, are excluded from this requirement. Mushrooms, which are not plants and therefore do not depend on minerals from soil, are excluded from this requirement.

3. Hydroponics Prohibited

All forms of hydroponic crop production, which is a generic class of soil-less production whereby terrestrial plants are grown with their roots in a nutrient solution only or in an inert medium to which a nutrient solution is added, are prohibited. Aquatic plants are excluded from this prohibition.

4. Containers Prohibited
   Growing terrestrial plants to harvest in containers, bags, or similar vessels, in which the roots are not in connection with the soil, the subsoil and the bedrock is prohibited. Real Organic Project farms may harvest minor production from containers provided products harvested from containers are not labeled Real Organic Project, and do not represent more than 1% of total farm sales.

5. Transplants Allowed
   In order to facilitate traditional organic propagation and production methods, growing annual or perennial seedlings or transplants in container vessels for further transplanting into soil is permitted so long as: 1) all substrate materials used are allowed in NOP organic production, and 2) the transplant growth life cycle occurs where plant roots in living soil in connection with the subsoil and bedrock must provide the majority of nutrients, as measured from time of initial seeding/propagation to time of commercial crop harvest, and is measured by crop mass.

6. Ornamentals and Herbs Sold in Containers
   Ornamental plants and herbs may be grown and sold in the containers in which they grew. This will ensure that consumers understand how these plants were produced. All substrate materials used must be allowed in NOP organic production.

7. Microgreens Production
   Microgreens are a crop analogous to sprouts. Therefore, microgreens may be grown in container vessels provided that 1) no solid or liquid fertility is added to the container after the crop is planted, and 2) the microgreens must be harvested within 21 days after planting. Analogous to sprouts, the seed used in the production of all microgreens must be NOP Certified Organic.

8. Greenhouses and High Tunnels
   Greenhouses and/or high Tunnels with insulation/barriers below in-ground growing spaces must meet the following criteria:
   a. In-ground crops grown in greenhouses and/or high tunnels with insulation/barriers below in-ground growing spaces will not be Real Organic Project certified. These crops must be labeled as “not real organic project certified” at the point of sale if that point of sale is controlled by the grower (i.e. a farm stand or farmers market booth)

   b. In-ground production takes place in a mix of primarily soil and compost. Largely inert media such as coconut coir is not allowed as a primary soil component

c. Growing area has enough soil depth that plants can grow as they naturally would in unmodified outdoor soil environments

d. Growing crops for harvest in greenhouses/high tunnels with insulation/barrier below in-ground growing areas is not the primary means of farm's crop production"

e. Clarification: Bedding plant production is allowed to be Real Organic Project certified when produced in the above facilities

Real Organic Project Standards for Soil Management

The Real Organic Project standards for soil management are the EXACT NOP standards stated in section 205.203 of the NOP Regulatory Text, however the Real Organic Project standards honor the legal meaning of the word "must."

1. The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion.

2. The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.

3. The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Animal and plant materials include:
    a. Raw animal manure, which must be composted unless it is:
        i. Applied to land used for a crop not intended for human consumption;
        ii. Incorporated into the soil not less than 120 days prior to the harvest of a product whose edible portion has direct contact with the soil surface or soil particles; or
        iii. Incorporated into the soil not less than 90 days prior to the harvest of a product whose edible portion does not have direct contact with the soil surface or soil particles;

    b. Composted plant and animal materials produced through a process that:
        i. Established an initial C:N ratio of between 25:1 and 40:1; and
        ii. Maintained a temperature of between 131°F and 170°F for 3 days using an in-vessel or static aerated pile system; or
        iii. Maintained a temperature of between 131°F and 170°F for 15 days using a windrow composting system, during which period, the materials must be turned a minimum of five times.

    NOTE: The NOP published a guidance document that is meant to help certifiers and producers interpret the manure composting guidelines presented above. Real Organic Project will inspect the compost standards as specified in the Appendix.[2]

c. Uncomposted plant and animal materials
A producer may manage crop nutrients and soil fertility to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances by applying
   i. A crop nutrient or soil amendment included on the National List of synthetic substances allowed for use in organic crop production;
   ii. A mined substance of low solubility;
   iii. A mined substance of high solubility: Provided, That, the substance is used in compliance with the conditions established on the National List of nonsynthetic materials prohibited for crop production;
   iv. Ash obtained from the burning of a plant or animal material, except as prohibited in paragraph (e) below: Provided, That, the material burned has not been treated or combined with a prohibited substance or the ash is not included on the National List of nonsynthetic substances prohibited for use in organic crop production; and
   v. A plant or animal material that has been chemically altered by a manufacturing process: Provided, That, the material is included on the National List of synthetic substances allowed for use in organic crop production established in § 205.601.

The producer must not use:

   vi. Any fertilizer or composted plant and animal material that contains a synthetic substance not included on the National List of synthetic substances allowed for use in organic crop production;
   vii. Sewage sludge (biosolids) as defined in 40 CFR part 503; and
   viii. Burning as a means of disposal for crop residues produced on the operation: Except, That, burning may be used to suppress the spread of disease or to stimulate seed germination.

d. Exceptions to Real Organic Project Soil Management Standards are limited to:
   i. Seed Sprouts and Microgreens
   ii. Mushrooms
   iii. Aquatic plants
   iv. Seedlings and planting stock for transplanting

Real Organic Project Standards for Greenhouse Production

1. Control of soil-borne pests and diseases
Soil health must be primarily maintained by the addition of biologically active compost and other organic materials, by the addition of rock powders, by good sanitation, and/or by practices such as crop rotation or other forms of plant diversity (such as intercropping and undersowing). Solarization and shallow steam treatment of the soil (to a maximum depth of 4 inches) are allowed. Deep steam treatment of the soil (to a depth of more than 4 inches) must only be allowed under exceptional circumstances (e.g. severe infestation with nematodes), which must be documented by the grower, and must require special permission from the program administrator. Steam sterilization of growing media is not allowed.

2. Light
   The provision of artificial light is allowed, if the normal daylight is insufficient for the normal growing of crops. It must only be allowed on dark, overcast days and for extending the daylight period, and only during autumn, winter and early spring. Artificial light is also allowed for the production of container plants such as seedling, herbs, and ornamentals under the same limitations as already described. Artificial light may also be used for photo-periodical induction of flowering. Seedlings may be grown using 100% artificial light. This exception only applies to plants being grown for on farm transplant or sale within the container they are being grown in.

3. Exceptions to Soil Bound Production
   Growing in substrates (containers) is accepted for seedlings and transplants, and for plants which are sold to the consumer together with the pot/container in which they grow (e.g. herbs in pots, ornamentals). Harvested organic vegetables or fruits must come from plants grown in the soil, and not from container or isolated substrate cultures. Microgreens may be produced in containers if there is no feeding of any kind to the container after seeding. Harvest must occur within 21 days of seeding. Seed for microgreens must be 100% organic.

4. Energy use
   If the greenhouse energy consumption exceeds 41,000 BTU per ft^2 per year, an energy analysis is required and a plan for increased energy efficiency and/or greater use of renewable energy must be produced. The need for lighting and heating, the availability of different sources of energy and the state of the art of greenhouse production vary greatly between different regions. Depending on such regional conditions, different strategies may be necessary to achieve the goal of responsible energy use. We recognize that there is no single recipe for the most responsible use of energy. This task will therefore be difficult to achieve with a single regulation, as long as no scientifically based limit exists. But a process of continuous attention and improvement can lead the way to real change. The heating of greenhouses to assure frost protection to 40°F is allowed without limitation.

5. Rotation
   Crop production without a rotation in protected (greenhouse or tunnel) culture is allowed if the producer can:
   a. demonstrate that the system builds and maintains the health of the soil and crops;

   b. demonstrate that the system is not reliant upon routine use of (approved) pesticides for insect control. Pesticides are intended as a fallback strategy. Intensive growers must create a level of soil health and a rich biological community that allows production without the regular use of pesticides.

   The farm must produce a fertility management plan for the protected cropping system. The plan must demonstrate that the growing system maximizes the efficient use of nutrients and builds soil health and fertility.

Real Organic Project Standards for Origin of Livestock

1. Dairy cows can only be transitioned from conventional to organic with a one-time transition of a single-entity dairy herd during a 12-month transition period. The continuing or recurring transition of conventional animals to organic is prohibited.

2. A maximum of 200 dairy animals may be transitioned in a one-time transition, and at least 40% of the transitioning herd must be under two years of age.

3. A 12-month transition, from conventional to organic, does not begin until a completed application is received by the Real Organic Project program administrator.

4. All animals to be transitioned must be on the farm at the beginning of the transition, and each animal must have an identification name or number that can be positively associated with the animal (e.g., ear tattoo, or ear tag).

5. 100% of organic standards, including pasture requirements, outdoor access, feed requirements and appropriate healthcare materials must be met for all groups of animals for the entire transition year.

Real Organic Project Standards for Grazing of Ruminant Animals

1. A minimum of 40% DMI and a goal of 50% or greater DMI from pasture averaged over the entire grazing season for each type and class of animal (e.g., milking cows, dry cows, heifers). Farms below 50% DMI must provide a plan for how to achieve 50%, or describe the reasonable impediments to achieving 50%.

2. The grazing season is defined as beginning two weeks after the average normal 24-hour temperature for the farm's specific locale rises above 45° F and ends when the average normal 24-hour temperature declines to 45° F. It includes all months in between in which pasture forages normally grow in the locale. The grazing season can be suspended for time periods when the average normal 24-hour temperature in the locale rises above 80° F. It must commence again two weeks after the average normal 24-hour temperature declines to 80° F.

3. The Real Organic Project program administrator can make exceptions for documented cases of droughts or floods.

4. The maximum herd size for dairy cows grazing pastures associated with a single milking facility shall be 1000 animal units. Upon written request, variances may be granted based on uniquely favorable growing climates that can achieve 50% DMI or greater from pasture.

Terms Defined

Animal Units: The sum of the weights of all animals in a group divided by 1000.

Real Organic Project Standards for Animal Welfare

1. General management practice standards

a. All individual animals must have daily, year-round access to the outdoors, where the outdoors constitutes at least 50% vegetated cover during the growing season. Vegetative cover may include but is not limited to pasture, bushes, shrubs, hedgerows, and trees.

2. Exceptions other than those in the Organic Regulations include:
    a. Pigs are exempt from specific vegetative cover requirements, but must have access to vegetative cover during the growing season and must be managed to contribute to long-term soil health and prevent degradation of the soil.

    b. Yards, feeding pads, and feedlots may be used to provide access to the outdoors during the non-growing season.

3. The following alterations and practices are prohibited:
    a. Needle teeth trimming or grinding, nose ringing, tusk removal, castration after 14 days of age, and tail docking in pigs;

    b. Tail docking and wattling in cattle;

    c. Disbudding (removing buds under 2 months of age) without anesthesia or NOP allowed pain relief (for example, Dull It). Tipping horns (cutting the non-living tissue) and banding horns is allowed without anesthesia. Dehorning (removing horns over 2 months of age) must always be done by experienced handlers and with appropriate anesthesia.

    d. De-snooding, wattle and comb trimming, notching, toe-clipping and trimming, hole-punching, dubbing, de-beaking and beak trimming, caponization, and forced molting in avian species;

    e. The use of goggles or other similar artificial devices designed to reduce feather pecking;

    f. Mulesing and tail docking of sheep shorter than the distal end of the caudal fold in sheep;

    g. Face branding for all species.

4. The producer of an organic operation must manage manure, including poultry manure, in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, heavy metals, or pathogenic organisms. The producer must also optimize recycling of nutrients and must manage outdoor access in a manner that does not put soil or water quality at risk.

5. Species-specific management practice standards
    a. Cattle, goats, sheep and other ruminants
        i. Ruminants must get a minimum 40% DMI from pasture during the grazing season, even during a finishing period.

ii. All ruminants, including dairy cattle, must be organic from the last third of gestation other than the one-time farm transition to organic certification.
iii. All housing of young stock must be designed so that animals can see, smell, and hear other animals. Ruminants may be housed individually until weaning, as long as the animals have sufficient room to turn around, lie down, stretch out while lying down, get up, rest, and groom themselves. Young ruminants housed in hutches must have continual access to an outdoor exercise area.
iv. New construction of tie-stall and stanchion housing is prohibited. Tie stalls and stanchions can be used in the milking parlor for the duration of milk collection.
v. Young ruminants must be fed colostrum within the first 24 hours of birth.

b. Chickens and other poultry
   i. Outdoor access must include soil connected to subsoil and bedrock. The use of "porches" or other screened in and/or roofed structures attached to a fixed poultry house does not qualify as outdoor access.
   ii. Slaughter age
      1. All poultry must spend a minimum of half of their life with outdoor access before being slaughtered. Cornish game hens require 40% of their life with outdoor access. Outdoor access is defined as soil with a minimum 50% vegetative cover.
      2. Exceptions to slaughter prohibitions include situations where humane euthanasia is required.
   iii. Poultry housing must allow all birds to move freely and engage in natural behavior, including spreading and flapping their wings without interference, foraging, grooming, bathing, scratching, perching, and other instinctual behaviors.
   iv. Poultry definitions:
      1. Mobile housing: A mobile structure for avian species that is moved regularly during the season to fresh ground.
      2. Fixed housing: Housing that is fixed in place on the land, without the ability to be moved or rotated regularly.
   v. Indoor spacing requirements:

	Mobile Housing	Fixed Housing (measured in linear floor space)
Chicks	Minimum of 0.5 ft^2 per bird through 4 weeks old	Minimum of 0.5 ft^2 per bird through 4 weeks old
Pullets	Minimum of 1 ft^2 per bird from week 5 to maturity	Minimum of 2 ft^2 per bird from week 5 to maturity
Layers + Breeders	Minimum of 1.75ft^2 per bird	Minimum of 3.5ft^2 per bird

	Stocking density must not exceed 4 lbs/ ft^2 (live weight)	Stocking density must not exceed 2 lbs/ ft^2 (live weight)
Broilers	Minimum of 2.85 ft^2 per bird Stocking density must not exceed 3.5 lbs/ ft^2 (live weight)	Minimum 6.75 ft^2 per bird Stocking density must not exceed 1.5 lbs/ ft^2 (live weight)
Poults	Requires a minimum of 0.75 ft^2 per bird through 5 weeks of age	Requires a minimum of 0.75 ft^2 per bird through 5 weeks of age
Turkeys	Minimum of 3 ft^2 per bird, 6 weeks and older	Minimum of 6 ft^2 per bird, 6 weeks and older
Other Poultry	Stocking density must not exceed 2.5 lbs/ ft^2	Stocking density must not exceed 1.5 lbs/ ft^2

vi. Minimum outdoor spacing requirements:

	Mobile Housing	Fixed Housing (measured in linear floor space)
Layers + Breeders (Seasonal Total)	108 ft^2 per bird over the course of the outdoor season	125 ft^2 per bird over the course of the outdoor season
Broilers (Seasonal Total)	75 ft^2 per bird over the course of the outdoor season	100 ft^2 per bird over the course of the outdoor season
Turkeys (Seasonal Total)	175 ft^2 per bird over the course of the outdoor season	220 ft^2 per bird over the course of the outdoor season
Pullets	4 ft^2 daily minimum per bird	4 ft^2 daily minimum per bird
Layers and Breeders	5 ft^2 daily minimum per bird	5 ft^2 daily minimum per bird
Broilers	2.85 ft^2 daily minimum per bird	6.75 ft^2 daily minimum per bird
Turkeys	6 ft^2 daily minimum per bird	6 ft^2 daily minimum per bird
Other Poultry	1.5lbs/ ft^2 daily minimum per bird	1.5lbs/ ft^2 daily minimum per bird

vii. Outdoor access requirements:
    1. Fresh food and water must be provided outdoors whenever the birds are using the outdoor space.

viii. The producer of an organic poultry operation may temporarily confine birds. Confinement events must be recorded. Operations may not temporarily confine birds under the following circumstances:
    1. When air temperatures are between 30° F and 100° F. Confinement due to weather can only happen on the day of the predicted inclement weather

    2. Birds cannot be confined due to reseeding the outdoor space.

ix. Lighting requirements
    1. Shelters and housing must allow natural light to enter during daylight hours such that inspectors can read without assistance while inside the shelters or housing.

x. Farms meeting the following criteria qualify for an exemption from certain parts of Real Organic Project's poultry standards:
    1. Poultry products are only sold direct to consumers
    2. Farm raises under 1000 total birds per year with no more than 250 total birds at one time

    Farms meeting these criteria are exempted from the specific square footage requirements for poultry housing and outdoor space outlined in Real Organic Project's standards.

    Instead, these farms must provide enough outdoor space for poultry so that the pasture they have access to can be maintained in a healthy manner with at least 50% vegetative matter. Housing must provide birds enough room to move freely and engage in natural behavior, including spreading and flapping their wings without interference, foraging, grooming, bathing, scratching, perching, and other instinctual behaviors. The program administrator may, at their sole discretion, determine that individual outdoor spaces and/or housing units falling under this exemption do not meet sufficient humane or environmental standards. In these instances certification of exempted poultry may be denied.

    All other poultry and animal standards not outlined here still apply to poultry operations falling under this exemption.

c. Pigs
    i. Pigs must be housed in groups except during:
        1. Farrowing and suckling periods,

2. For boars,
3. Individuals recovering from illness.
4. Piglets must not be kept on flat decks or in piglet cages.
5. Gestation crates and farrowing crates are prohibited. Sows must be able to stand up, turn around, and lay down at all times.

ii. Creeps and bumper bars may be used if set a maximum of 18 inches away from a wall.

iii. Slatted flooring is prohibited in all pig housing and shelters.

iv. Bedding and manipulatable materials:
1. Deep bedded straw and/or rooting and/or manipulatable materials must be provided for all pigs to allow individuals to forage, nest, and otherwise prevent behavior problems whenever indoors or during temporary confinement events.
2. During the farrowing and suckling period a minimum of 2 inches of bedding material must be provided through seven days of age, after which more is added.
3. The majority of the bedding must be dry.

Real Organic Project Standards for Hired Labor Protections

The intent of these standards is to provide resources for farms, to serve as a guide for best employment practices and to set our farms apart. It is the responsibility of each operation to ensure compliance with their state and federal regulations.

*indicates resources and templates provided by the Real Organic Project found in the Appendix

1. Hired Labor
Real Organic Project's labor protections standards only apply to hired labor. The following groups are not considered hired labor:
   a. Immediate family members – parents, children, brothers, sisters and their children (unless they are on the official farm payroll).

   b. Volunteers – crop mobs, school, club or church groups who work for a few hours or a day, CSA members who do working shares in exchange for food or reduction in share price.

   c. Educational programs and tours including short term work stays such as WOOFing. Apprenticeship and Internships are not considered exempt from Real Organic Project hired labor standards and must be a bona fide educational program. Apprenticeships/Internships must have at least one of the following: a written educational curriculum, an individualized learning

agreement/contract, or be formally associated with a college or university program.

d. Work trades or barter relationships with neighbors, relatives or friends.

2. Hiring
    a. Hiring ads and practices do not discriminate against any state or federally protected groups.

    b. Employers must not receive any payment from employees or prospective employees for any cost associated with obtaining a job.

    c. Employers agree to disclose to Real Organic Project whether they use contract labor, and the name of the contract labor organization they use.

    d. Employers provide a clear disclosure to employees regarding whether or not employees have access to workers compensation and unemployment insurance.

3. Pay
    a. All employers must have a system that can reasonably provide employees with pay stubs for every pay period detailing hours, pay, taxes and employer deductions. Farms in their first 5 years of operation or who have less than 3 employees, may provide this information in an alternative written format provided that employees can still clearly determine their pay, hours and deductions within a given pay period.

4. Housing (**If** an employer provides housing to their employees) must
    a. Be a safe and sanitary physical environment

    b. Have a natural source of light and a safe source of lighting

    c. Have a clean, private and cleanable space with a space for personal cleaning and access to a sanitary bathroom or latrine

    d. Have access to potable water

    e. All employee housing must be described accurately and in detail previous to employment. This must include a special emphasis on non-traditional housing

5. Workplace
    a. All documents provided to farm workers (such as pay stubs, work contracts etc.) must be provided in the native language of the farm worker.

    b. Employees must have complete freedom of movement and association.

c. Employees must have access to medical care, access to transportation, communications (phone/computer), and shopping for basic needs.

d. Employers must not, under any circumstances, hold on to employee passports, immigration, or work documents.

e. Employees are provided, at no cost
    i. All tools, supplies, and equipment required to safely perform their assigned duties.
    ii. Appropriate safety equipment when exposed to levels of high noise, dust or dangerous chemicals, or are working with dangerous equipment.
    iii. Appropriate safety training by their employer on all potentially hazardous equipment and materials.

f. Employees have access to a clean bathroom (e.g. a stationary restroom, a mobile bathroom unit or trailer somewhere on the farm property)

g. Employees have ongoing access to hand soap.

h. Employees have ongoing access to cool, potable water.

i. Employees have reasonable access to shade.

j. The farm has clearly defined what "safety" means in reference to the farm and its practices.

k. Employees know they can decline work that they deem "unsafe" without fear of retaliation.

6. Employment Practices
    a. Employers provide clear expectations around work day structure, including approximate daily start and stop times.
    b. Employers clearly communicate the frequency of daily rest breaks.
    c. If seasonal: At the end of the current season, employers and employees discuss opportunities for return employment.
    d. The farm should have an evaluation process in place to explore a potential increase in pay and/or benefits for returning employees.

7. Encouraged Documentation

    Real Organic Project considers it best practice for farms to provide the following documents to their employees. However, we recognize that this may be a burden to some of our small and beginning farms and do not require these documents for certification at this time.

    a. As part of a benefit of our certification program, all Real Organic Project farmers will be provided with templates for an employee handbook, work contract, and relevant SOPs. As part of Real Organic Project's certification, farms are encouraged to provide these documents to their employees on an annual basis.

b. Employers are encouraged to provide a written offer of employment in a language they can understand and that captures starting wage, anticipated work schedule, anticipated weekly hours throughout the employment period, employment start and end dates, and any included benefits (for example, by email).
c. Employers are encouraged to maintain an up-to-date employee handbook* readily accessible to employees in a language they can understand.
d. Employers are encouraged to include a heat safety policy* and an air quality policy* in their Employee Handbook.
e. Employers are encouraged to maintain a transparent termination policy.*
f. Employers are encouraged to maintain a sexual harassment policy.*

*Resource Appendix:
The Real Organic Project does not confirm that the provided templates meet all state and federal regulations.

- Employee contract
- Employee Handbook (Farm Commons, AJP, sample)
- Heat Safety Policy
- Air Quality Policy
- Termination Policy
- Sexual Harassment Policy

The Encouraged Documentation, Hiring, Workplace and Employment Practices standards published January 1st, 2026 have an effective date of January 1st, 2027 with an implementation date of January 1st, 2029. Standards published on January 1st, 2026 include Hiring d-e, Workplace f-1 and Employment Practices a-h.

Real Organic Project Standards for Processed Products

1. All certified Real Organic Project processed products must be NOP certified.

2. A processed product made with at least 90% Real Organic Project certified ingredients, by weight or volume, can use the Real Organic Project logo. If a processor has less than 90% Real Organic Project ingredients, by weight or volume, they cannot use the Real Organic Project logo, but they can identify on the front panel specific Real Organic Project ingredients and/or percentage of ingredients that are Real Organic Project certified.

3. Producers must be able to verify that no ingredients are sourced from CAFOs or hydroponic operations, as defined by Real Organic Project, in order to qualify for the above.

4. An individual ingredient that is sourced from both Real Organic Project certified and non Real Organic Project certified sources cannot be labeled as a Real Organic Project ingredient.

5. All processing of final products must take place on the Real Organic Project certified farm producing the key ingredient, with the exception of single-ingredient products.

6. In instances where operations do not have access to an on farm processing facility they may use a commercial kitchen or certified organic processor. The program administrator, at their sole discretion, reserves the right to review off farm processing arrangements to ensure they have a low likelihood of creating product integrity issues. In instances where the processing arrangement is deemed to have a significant likelihood of product integrity issues the program administrator may, at their sole discretion, choose to deny certification to processed products that would otherwise qualify for Real Organic Project certification If the production exceeds Real Organic Project's capacity as a program to inspect the program administrator may, at their sole discretion, chose to not certify a processed product.

Real Organic Project Standards for Compliance and Appeals

1. An operation whose Real Organic Project certification has been suspended or revoked, may appeal to the standards board for reinstatement after a minimum of 12 months. Certification will not be reinstated less than 36 months from any application of prohibited materials. No operation may apply for an appeal more than once for the same violation.

2. Real Organic Project may, on occasion, need to protect the integrity of the program by rejecting certification for farms due to reasons unrelated to farming practices. At their sole discretion the program administrator may reject a farm for certification if:
    a. The farm is deemed, by the program administrator, to have violated Real Organic Project's "Code of Conduct" which reads as follows:
        i. Real Organic Project seeks to promote fairness, inclusivity, and equity in our own work and at large in our role in the community. Real Organic Project celebrates and encourages ideological, political, and personal diversity amongst its participating farms and other partners. Physical and emotional safety of Real Organic Project staff, and the farmers and farm workers that we work with are of utmost importance to our organization. Accordingly, Real Organic Project expects respectful and kind treatment to be practiced by, towards, and among all participating farmers, donors, staff, partner organizations, and other stakeholders and supporters.

3. Real Organic Project does not exclude from participation any person due to discrimination because of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, or marital or family status. Real Organic Project reserves the right to exclude individuals from our program(s) who engage in physical, psychological, verbal, or sexual harassment or other abuse of any kind towards Real Organic Project staff members, volunteers, contractors and partners.

Real Organic Project does not condone or tolerate denigrating speech or behavior in any interaction with Real Organic Project staff, volunteers, contractors or partners.

4. As an “add-on” certification Real Organic Project requires all of the farms it certifies to have a current NOP certification, or its equivalent in Canada and/or Mexico. All farms Real Organic Project certifies must have a current and substantive relationship with an NOP (or equivalent in Canada/Mexico) approved certifier. Real Organic Project recognizes there may be circumstances where farms may not have a certifier for a specific reason over a limited period of time (for example: when transitioning from a certifier that is closing to a new certifier). However, in circumstances where a farm has gone a significant period of time without a current and substantive relationship with a certifier (for example: while undertaking administrative action or appeals) the program administrator, at their sole discretion, may suspend or revoke that farm’s Real Organic Project certification.

Appendix

1. National Organic Standards Board Excluded Methods
    a. Introduction and Background
    At the November 18, 2016 in-person National Organic Standards Board (NOSB) meeting, the NOSB recommended that the National Organic Program (NOP) develop a formal guidance document for the determination and listing of excluded methods. The 2016 recommendation, entitled “Excluded Methods Terminology,” clarifies excluded method definitions and criteria in response to the increasing diversity in the types of genetic manipulations performed on seed, livestock, and other biologically-based resources used in agriculture. Genetic engineering is a rapidly expanding field in science. To be responsive to this rapid expansion, the NOSB will continue to list new methods for review and will determine over time if the methods are or are not acceptable in organic agriculture. In addition to the 2016 recommendation, a discussion document provided a list of technologies needing further review to determine if they should be classified as excluded methods or not. At the Fall 2017 NOSB in-person meeting, the NOSB passed a recommendation to add three technologies as excluded methods to the NOP guidance document. In Fall 2018, the NOSB recommended one technology be added to the list of methods that are not to be excluded in organic production. In April 2019, one more method was added to the list of methods to be excluded. The organic community, as well as the NOSB, has voiced a consistent stance that direct manipulation of genes through in vitro nucleic acid techniques should be considered an excluded method. This would include gene editing techniques such as CRISPR, which was determined to be an excluded method by the NOSB in November 2016. The NOSB will continue to review and determine various methods and technologies to provide clarity to the organic community on which methods could be allowed and which ones are excluded.

b. Definitions and Criteria
Under the National Organic Program organic regulations, methods that employ genetic engineering techniques are excluded from use in organic production. The current regulation defines an excluded method as: A variety of methods used to genetically modify organisms or influence their growth and development by means that are not possible under natural conditions or processes and are not considered compatible with organic production. Such methods include cell fusion, microencapsulation and macroencapsulation, and recombinant DNA technology (including gene deletion, gene doubling, introducing a foreign gene, and changing the positions of genes when achieved by recombinant DNA technology). Such methods do not include the use of traditional breeding, conjugation, fermentation, hybridization, in vitro fertilization, or tissue culture.

Below are the criteria listed in the 2016, 2017, 2018 and 2019 NOSB recommendations to determine if methods should be excluded. The table includes the NOSB vote in April 2019, to add transposons developed via use of in vitro nucleic acid techniques as an excluded method.

i. The genome is respected as an indivisible entity, and technical/physical insertion, deletions, or rearrangements in the genome is refrained from (e.g. through transmission of isolated DNA, RNA, or proteins). In vitro nucleic acid techniques are considered to be an invasion into the plant genome.
ii. The ability of a variety to reproduce in a species-specific manner has to be maintained, and genetic use restriction technologies are refrained from (e.g. Terminator technology).
iii. Novel proteins and other molecules produced from modern biotechnology must be prevented from being introduced into the agro-ecosystem and into the organic food supply.
iv. The exchange of genetic resources is encouraged. In order to ensure farmers have a legal avenue to save seed and plant breeders have access to germplasm for research and developing new varieties, the application of restrictive intellectual property protection (e.g., utility patents and licensing agreements that restrict such uses to living organisms, their metabolites, gene sequences, or breeding processes) are refrained from.

c. The NOSB has voted and determined these to be excluded methods:
i. Targeted genetic modification (TagMo) syn. Synthetic gene technologies syn. Genome engineering syn. Gene editing syn. Gene targeting
ii. Gene Silencing
iii. Accelerated plant breeding techniques
iv. Synthetic Biology
v. Cloned animals and offspring
vi. Plastid transformation
vii. Cisgenesis
viii. Intragenesis

ix. Agro-infiltration
x. TransposonsDeveloped via use of in vitro nucleic acid techniques
xi. Induced mutagenesis - Developed via use of in vitro nucleic acid techniques.

d. Citation
NOSB October 2019 proposals and discussion documents pages 109-114. National Organic Standards Board Materials/GMO Subcommittee Proposal Excluded Methods Determinations October 2019. Approved on August 13, 2019

2. NOP Guidance 5021 Compost and Vermicompost in Organic Crop Production
   a. Purpose.
   This guidance provides clarification on allowed practices for composition, production, and use of compost and vermicompost in organic crop production.
   b. Scope
   This guidance applies to National Organic Program (NOP) certifying agents, all certified and exempt organic producers, and input suppliers.
   c. Background
   The NOP regulation 7 CFR 205.203(c), the soil fertility and crop nutrient management practice standard, sets forth the requirements for management and application of plant and animal materials. This section of the NOP regulations provides specific requirements for the use of compost and raw manure, but does not describe the full range of methods that may be used for compost production.

   A key provision of the NOP regulations regarding addition of organic matter is found at ¤ 205.203, which states: “The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances.” Section 205.203 further states that animal and plant materials include three types of materials: raw manure, composted plant and animal materials, and uncomposted plant materials. Raw manure is restricted in use, and compost containing animal materials must be produced under certain conditions.

   The designated types of systems do not include common methods of composting such as in piles (rather than windrows) or include any reference to vermicompost. The National Organic Standards Board (NOSB) convened two task forces that delivered comprehensive reports to the NOSB on compost (2002) and compost tea (2004). The NOSB then made a final recommendation on compost, compost tea, processed manure, and vermicompost in November 2006.

   The NOP concurs with the NOSB that the examples provided in ¤ 205.203(c)(1-3) is not a finite list of acceptable plant and animal materials for

use in organic production. Site-specific variation in feedstock materials, management practices, and production requirements dictate that organic producers exercise flexibility in managing plant and animal materials on their operations. In July 2007, the NOP issued NOP 5006 – Processed Animal Manures. NOP 5006 clarifies the criteria for production of processed manure products that may be used without restriction in organic production.

While the use of processed animal manures was clarified in NOP 5006, the use of vermicompost was not addressed in that guidance. Vermicompost is an alternative method for meeting the NOP compost requirements. Vermicomposts are organic matter of plant and/or animal origin, consisting mainly of finely-divided earthworm castings, produced non-thermophilically with bio-oxidation and stabilization of the organic material, due to interactions between aerobic microorganisms and earthworms, as the material passes through the earthworm gut. Feed stocks for vermicompost materials include organic matter of plant or animal origin, preferably thoroughly macerated and mixed before processing. Pathogenic organisms are eliminated in 7–60 days, depending on the technology used.

Vermicomposting systems depend upon regular additions of thin layers of organic matter at 1–3 day intervals to maintain aerobic conditions and avoid temperature increases above 35°C (95°F) which will kill the earthworms. Methods of vermicomposting include outdoor windrows (usually managed for 6–12 months), angled wedge systems (usually managed for 2–4 months), indoor container systems (usually managed for 2–4 months) and continuous flow reactors (usually managed for 30–60 days). For outdoor windrows, one indicator that the process is complete is when the worms move out of the compost, which would typically take 6 months in warm conditions, or up to 12 months in colder climates. Earthworms fragment the organic wastes into finely-divided materials with a low C:N ratio and high microbial activity. Nitrogen is mostly found in the nitrate form, and potassium and phosphorus are in soluble forms. For most organic wastes, no traces of the raw materials are visible. Processing is maintained at 70–90% moisture content with temperatures maintained in the range of 18-30°C (65-86°F) for good productivity.

d. Policy
    i. General
    Compost and vermicompost production practices should be described in the operation's organic system plan (OSP). Certifying agents may allow the use of compost if they review the OSP and records and are assured that all requirements are met. Compost production records should include the type and source of all feedstock materials. When animal materials are used in compost production, the certified operation should maintain temperature monitoring logs, and document the practices used to achieve uniform elevated temperatures. Vermicompost production records should include the type and source of all feedstock materials. When animal materials are

used to produce vermicompost, the certified operation should maintain a log of duration of vermicomposting with a description of the practices used to achieve aerobic conditions and maintain adequate moisture. Certifiers reviewing compost inputs produced by commercial operators should similarly review the production methods and source materials.

Certified operations can also demonstrate compliance with the compost requirements by measuring temperature, time, moisture content, chemical composition, and biological activity. These measurements may include testing feedstock materials and compost for one or more characteristics including initial and final carbon to nitrogen ratios, stability (using ammonia/nitrate ratio, O_2 demand, CO_2 respiration rate, or other standard tests), pathogenic organisms, or contaminants.

ii. Compost
Compost containing plant and animal materials is allowed in accordance with ¤ 205.203(c)(2). Other examples of acceptable composting methods include:

1. Compost that is made from allowed feedstock materials (either nonsynthetic substances not prohibited at ¤ 205.602, or synthetics approved for use as plant or soil amendments), and
2. The compost pile is mixed or managed to ensure that all of the feedstock heats to the minimum of 131°F (55°C) for a minimum of three days. The monitoring of the above parameters must be documented in the OSP in accordance with ¤ 205.203(c) and verified during the site visit.

iii. Vermicompost
Vermicomposting is an acceptable method of composting when:

1. It is made from allowed feedstock materials (either nonsynthetic substances not prohibited at ¤ 205.602, or synthetics approved for use as plant or soil amendments);
2. Aerobic conditions are maintained by regular additions of layers of organic matter, turning, or employing forced air pipes such that moisture is maintained at 70–90%; and
3. The duration of vermicomposting is sufficient to produce a finished product that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances.

e. Permitted Uses
Composts containing animal materials that do not meet the requirements at 4.1 and vermicomposts containing animal materials that do not meet the requirements at 4.2 of this policy may be permitted subject to restrictions of ¤ 205.203(c)(1), similar to raw animal manure, provided all feedstocks are

allowed materials (either nonsynthetic substances not prohibited at ¤ 205.602, or synthetics approved for use as plant or soil amendments).

Compost and vermicompost made without animal materials as feedstock are not restricted in use, in accordance with the provision for uncomposted plant materials at ¤ 205.203(c)(3), provided all feedstocks are allowed materials (either nonsynthetic substances not prohibited at ¤ 205.602, or synthetics approved for use as plant or soil amendments).

f. References NOP Regulations (as amended to date) 7 CFR ¤ 205.203 Soil fertility and crop nutrient management practice standard. (c) The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Animal and plant materials include:
   i. Raw animal manure, which must be composted unless it is…
   ii. Composted plant and animal materials produced through a process that…
   iii. Uncomposted plant materials.

g. Citations
   7 CFR ¤ 205.602 Nonsynthetic substances prohibited for use in organic crop production. NOSB Recommendations
   November 2006, Final NOSB Recommendation on Guidance: Use of Compost, Vermicompost, Processed Manure, and Compost Teas. NOP Program Handbook: Guidance and Instructions for Accredited Certifying Agents and Certified Operations NOP 5006: Processed Animal Manures. July 22, 2011. Approved on July 22, 2011