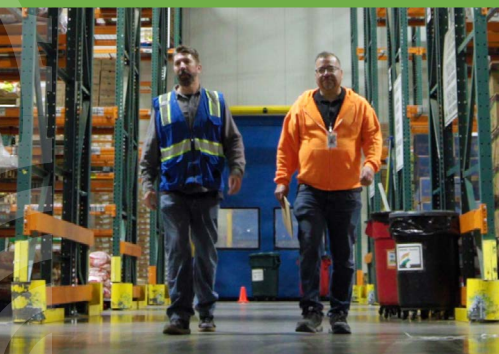




Advice from Experienced Organic Handlers

First-time handlers often find the organic certification process confusing and intimidating. After going through it a few times though, most become more relaxed and gain a bigger-picture sense of the inspection and of how they maintain organic integrity year-round. This article gathers what experienced handlers have learned, including the habits that serve them best and the things they wish they had known when they were starting out.



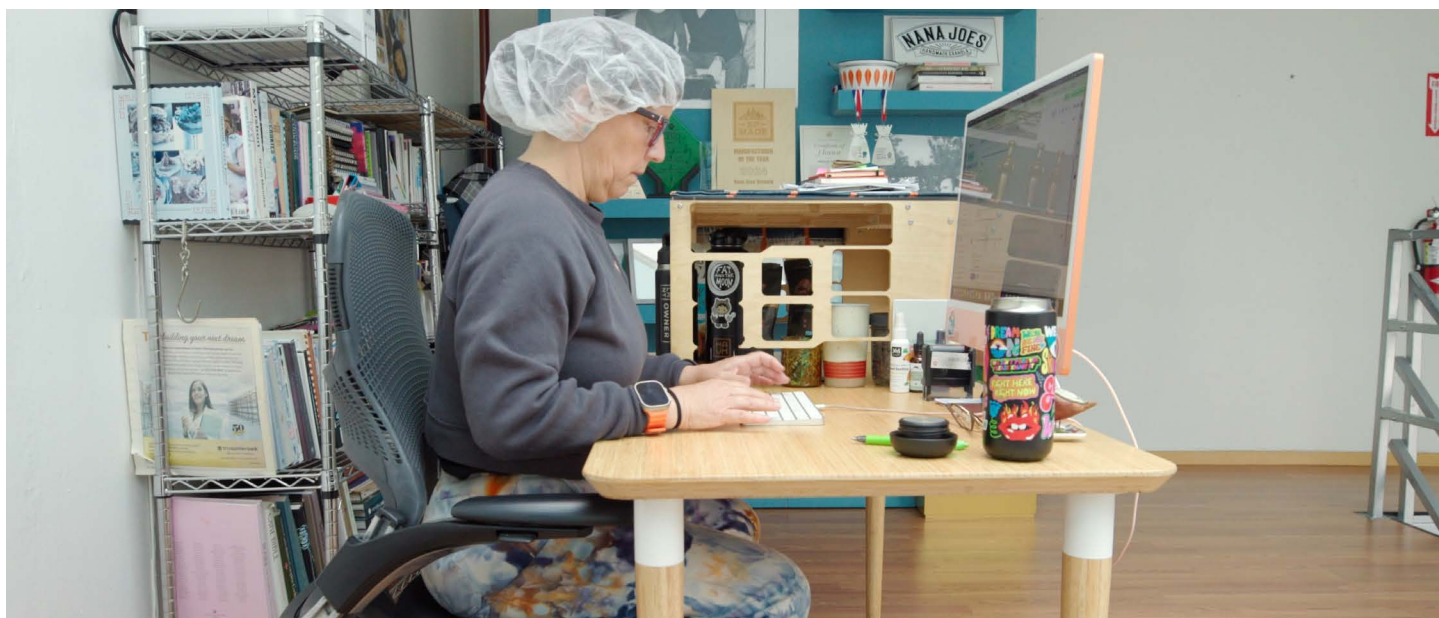
What You'll Learn

- Examine the mindset that sets successful handlers apart
- Identify the most common first-year mistakes and how to avoid them
- Analyze practical habits that experienced handlers use to maintain organic integrity

While the first inspection is universally nerve-wracking, it is also universally survivable! Experienced handlers who have systems in place find it gets easier every year as they continue to learn and improve.

As Michelle Pusateri, the owner of Nana Joes Granola, puts it, "I think I cried through my entire first audit. It was really difficult, but the person who was auditing us was incredible and really helpful and we learned so much from them." Now her business has been certified organic for over a decade, and organic integrity has become integrated into her company's culture.

This article collects lessons from handlers and certification experts who have been through the process many times. You'll learn what they learned the hard way and the habits that have served them best over the long haul.



ORGANIC AS A LONG-TERM INVESTMENT

Experienced handlers commonly say that their biggest first-year mistake was not a recordkeeping gap or labeling error; instead, it was entering certification with the wrong mindset. In their first year of certification, these handlers saw organic as a one-time business cost rather than an ongoing business practice with special values that would become part of the company's own way of working.

The organic market was \$9 billion in 2002,¹ and it's over \$70 billion in 2026.² The companies that have thrived have been ones that committed for the long haul and stayed in the market. Often, companies that jumped in for financial reasons only have not lasted.



The Legal and Regulatory Analyst at Traditional Medicinals, Sofia Miguel, reflected on their approach saying, "I hear some people complaining about the cost of organic, and I think that comes from the presumption that it's sort of a one and done, that organic is just something that you pay for and then it's just done and you just carry it, rather than baking it into the whole process, making it part of the business plan, part of the budget. It's an ongoing, constantly evolving process, co-evolving. It's moving alongside with you."

Is Organic Right For You?

Organic is great, but it's not a good fit for every business. Carefully consider whether organic is truly right for your company. Handlers may get into organic at the request of a customer. While this may be the right choice to satisfy a large and long-time customer, or a good entry point for a business that is already interested in organic certification, think through your end goals. Going organic to satisfy a single customer can turn out poorly if that customer goes out of business or sales are not as they projected, and the handler doesn't have a long-term plan for building organic business.

Organic Certification Tends to Strengthen the Whole Business

The value of organic goes beyond just putting the seal on your products. Organic certification also provides an opportunity to strengthen your business in order to meet the requirements of the organic standards. For example, organic handling requires you to keep essential records, and even checks up on those records at least once per year at the inspection.^{3,4} Without that accountability, many handlers find it too easy to let good records slide. Experienced organic handlers realize their business is stronger because they keep clear records on things like ingredient suppliers, pest control, and staff training.

"Most organic records, or the records that are specific to organic or required to demonstrate compliance, are records that you want to keep anyways ... As a business, I want to know what ingredients are coming in, how much, where they're coming from. I want to know how many units we made or moved through our facility ... The only difference with organic is that they require it."

Mike Dill
Director of Advocacy and Sustainability
Organically Grown Company

Make Organic Part of Your Culture

Organic compliance cannot rest on one person. The operations that sustain certification year after year are those that have invested in creating their own culture of organic integrity. Across the entire organizational chart, every staff member understands the big picture of organic and how their tasks support it.



For more on this, see [Building a Culture of Organic Integrity](#).

BUILD SYSTEMS THAT MATCH YOUR REALITY

Your Organic System Plan (OSP) is the legal backbone of your certification. It must describe your actual practices, like how you source and receive ingredients, prevent commingling and contamination, clean equipment, and keep records.⁵ The critical word is actual. One of the most consequential early mistakes that handlers make is writing an OSP that describes an idealized version of their operation and then not following it because it was written for the inspection, not for the organization.

The OSP is your plan and a pledge of the specific ways in which your business will fulfill the organic regulations. Remember that there is no one-size that fits all handlers. You are encouraged to be realistic when writing your OSP, and to update it when you find better ways of doing things. Inconsistencies between the OSP and actual, day-to-day practices are one of the most common sources of noncompliance.

“Someone might create a really beautiful or maybe overly elaborate production process to adhere to the requirements, and then they don’t follow it. And that is also a major compliance issue. If you say you’re going to do it, you have to do it ... So really structuring your process and system to fit the day-to-day activities while complying with the regulations, without overly inflating that production process into too much complexity ... is going to be really critical for success.”

Johanna Phillips

*Director of Business Development and Regulatory Affairs
Strengthening Organic Systems*

Complexity

While you want your OSP to be accurate and complete, don’t let the pursuit of perfection get in the way. Handlers coming from food safety audit culture sometimes over-engineer their organic compliance, and create a more complicated process with more documentation than is required. For handlers, organic certification is often simpler than what they are used to for other third-party audits. Start simple. You can always add more.

Keep Your OSP Updated in Real Time

In addition to writing an OSP that is realistic for **your** organization and not overly complicated, you also need to keep it up to date. Good plans aren’t rigid and they require attention and adaptation. Don’t only revisit your OSP once per year before the annual inspection. That almost guarantees a mismatch by inspection time. Instead, update your OSP as you and your staff make changes and discover better ways of doing things. You can build these updates into your continual improvement process, so that when a process, supplier, label, SOP, etc., changes, it is immediately updated in your OSP. The regulations also require this. Certified operations must notify their certifier of any changes that may affect compliance and many changes require certifier approval prior to implementation.⁶ Don’t wait for the annual renewal to report a new supplier, a new label, a new product, or a process change.

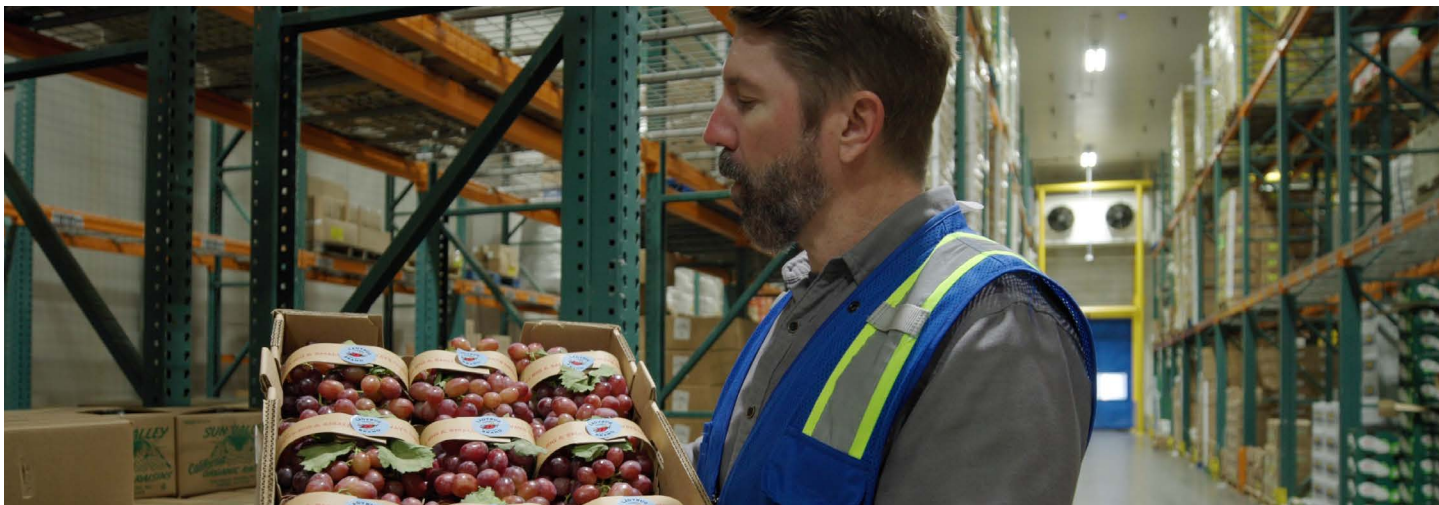
Your OSP Can Grow Throughout the Year



Although the process begins with writing your OSP, it continues throughout the year, so that your OSP is always being improved.

Recordkeeping

Handlers can select and change their recordkeeping system to fit their needs.³ From a notebook to a tablet and anything in between, choose what works for you. Many handlers have a 30-second rule. They want to be able to find any record within 30 seconds. If they can't, there are improvements that can be made to their system. Just because a system exists doesn't mean it will work for organic, and any system can be improved.



“When I arrived at OGC, we were managing our suppliers through a very complicated Excel spreadsheet that nobody understood but the person who was managing it. So we changed that and we created automated systems to track our suppliers ... in a way that is a lot more simple, that is more user friendly, and that could be easily understood by other interested parties in the company and also by the inspectors.”

Mike Dill
Director of Advocacy and Sustainability
Organically Grown Company

Don't let the inspection be the mechanism by which you find gaps in your system. That is a high-stress lesson. Instead, experienced handlers practice quarterly records checks like mass-balance and traceback audits, the same kind the inspector will perform.⁷ This allows the organic lead to stay in practice in doing these audits (so the exercise is routine by the time the inspector arrives), and also to uncover issues during these mock audits, because nobody is good at something that they only do once per year.

Also, there are some issues that will not come up at the first inspection. For example, your first inspection often doesn't fully test a recordkeeping system, because the operation hasn't been running long enough to have a full year of records. The organic sales records needed to run a traceback audit may not exist yet. The second inspection is where real gaps surface, so you want to be in practice before that comes around.

YOUR CERTIFIER IS A PARTNER

A mistake for many new handlers is treating the certifier as an adversary rather than a resource. Here again, mindset matters. Experienced handlers consistently describe a different frame of mind. They see their certifier as a compliance resource that's available all year, and the inspection is an opportunity to get fresh eyes on their operation. Once they've been certified for a while, most handlers have a collegial relationship with their certifier. There may be times, due to emergencies, when you might email or call your certifier in the evening and hear back from them the following morning, and that's a partnership.

Certifiers want you to succeed, but they can't help you unless you engage with them. Certifiers would much rather that you check in with them when you are first considering changes to your OSP than after you have made a change that isn't compliant. So call them if you are looking into updating things like labels, ingredients, equipment, or processes. If you change your OSP without communication and that change turns out to not be permitted, you will learn about noncompliances. As Organic Conservation Specialist Lynne Haynor says, "making sure that you stay in communication with your certifier is going to be essential for making sure that you stay compliant ... Sometimes just falling off the communication train can lead to bad outcomes for certification."



HANDLER TIP

Many certifiers offer pre-inspection checklists to their clients, so that when you think you are ready for inspection, you can check your preparations against their checklist to-do's.

Noncompliance happens at some point to most handlers. If you receive a notice of noncompliance, treat it as a routine, fixable part of the process. It means it's time to engage that growth mindset that has carried successful handlers systematically for years. If you receive a noncompliance notice, respond promptly with a corrective action plan.⁸ Noncompliances are fixable and common, especially in early years. The greatest risk is nonresponsiveness.

Choose a Certifier Who Knows Your Product

Some products are more straightforward to certify, usually those that are commonly certified and involve less processing. Other products are somewhat niche and many certifiers are not familiar with them. It is inconvenient to have to explain every part of your process and ingredient to your certifier because they don't understand your product. When choosing a certifier, experienced handlers recommend that your certifier have other clients in your product category. A certifier familiar with your niche can identify your specific Organic Control Points more precisely (the points where organic integrity is most at risk in your process). They will also be more familiar with the organic-approved ingredients and sanitation materials used in your process.



Jessica Jones runs an organic brewery, and realized that many certifiers did not know brewing. She says, "if you're interested in becoming an organic handler, find certifiers that have worked with your industry before, that have done similar scope things. They will have more reference points for working with you. And be in contact with them as early as possible."

A Growth Mindset

At some point after all your preparation your first inspection will be complete, and you'll likely have some things to address. Experienced handlers take each inspection as a learning opportunity, not a pass/fail test. Organic inspectors emphasize the facility improvements that come out of inspections, as Lynne Haynor noted, "having new eyes on your operation can point out things that are potentially weak points in your system. Taking these seriously as opportunities to improve your business and improve your ability to stay compliant with the organic standards is a good way to approach that part of the process."

VERIFY YOUR SUPPLIERS EVERY TIME

Supplier verification is one of the highest-risk areas for new handlers. Before becoming organic, handlers could buy from anyone they wanted, but supplier verification is essential in organic handling and can present a steep but crucial learning curve. Experienced handlers do everything they can to lower the risk of compromising organic integrity. They operate on a "trust but verify" principle: assuming good faith on the part of the supplier, but building systematic verification into receiving as a standard procedure, so that any mistakes or shenanigans on the part of suppliers are caught.

Mike Dill at Organically Grown Company says, "do not manage by distrust. It is very expensive and it is not effective. If you manage by trust, that means that you believe that the organic system works. And if you understand the things that are required for compliance and you look for compliance, it will be very easy to differentiate when something is not compliant. Always manage by trust. But even when it is important to trust, you need to trust but verify."

At receiving, every organic shipment should be verified thoroughly, against multiple data points. Abel Sánchez at Tradin Organic shares how he verifies suppliers: "The Organic Integrity Database tells you every company that is currently certified organic, every company who's had their certification suspended, and it gives you a good idea as to how long they've been certified organic and who they're certified organic with ... Looking at how long they've been audited, whether they jump around from certifier to certifier, all those small details really help us identify partners that we can build a relationship and trust with." You can read the article [Building and Maintaining a Supplier Approval Program](#) for more detailed guidance on verifying organic certificates.

Outright fraud does happen in organic, unfortunately. And the organic program is always changing and improving to mitigate fraud. Certified operations are required to maintain and implement practices to prevent organic fraud, and the steps you take to fight fraud must be described in your OSP.⁵

CONCLUSION

The organic certification process is demanding, especially in the first year. But the handlers and experts who contributed to this article are unanimous: it is doable, it gets easier, and it is worth doing because the steps required for certification make your entire operation better. Think long-term and invest in your team, build systems that match reality, keep in good communication with your certifier, and verify your supply chain.

"I want to encourage you to stay the course and stay strong in the face of, 'is this even worth it?' ... I think it's really important. I think customers really care. I think you'll feel better about your product, and it's absolutely attainable. It's a thing you can do, and it's worth doing."

Genevieve Albers
Compliance Manager
Traditional Medicinals

ACTION ITEMS

- Interview 2–3 certifiers before applying; ask specifically about their experience in your product category.
- Structure your OSP so that it describes what you actually do.
- Build organic certificate verification (including OID check) into your standard receiving procedure.
- Identify your facility's Organic Control Points (high risk areas) and document how each is managed in your OSP.
- Cross-train at least two staff members on your organic recordkeeping system.
- Schedule quarterly internal mock mass-balance or traceback exercises.
- Join the Organic Trade Association or a regional organic association for peer support and regulatory updates.

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