



VOF Organic Maple Certification Overview

Vermont Organic Farmers, LLC (VOF)

Northeast Organic Farming Association of Vermont (NOFA-VT)

VOF Office: 802-434-3821 vof@nofavt.org www.nofavt.org

Dear Maple Producer,

This is a follow up to your inquiry about certified organic maple production. Electronic maple applications are now available in the VOF Online Community. You should have received a welcome email from us to set up your login. If you have not received the email or have trouble setting up your account, please contact the VOF office. Note that we take new applicants on a rolling admission basis, so there is no official deadline. However, all maple operations must be inspected while the sap is still running, so it is recommended that you get your application in for review and inspector assignment prior to March 1.

If you are seeking certification for only maple sap and intend to sell your sap to a certified organic maple syrup producer, note that you must be certified and have your certificate in-hand before you sell any sap as organic. Please get your completed application submitted as soon as possible so we can get it reviewed and to an inspector as early in the season as possible.

We have developed this packet to help maple producers determine if organic certification is right for them and their operation. The first 2 pages are meant to serve as a checklist for people interested in organic maple certification to see what is involved and if their operation would be eligible.

Please read through the entire VOF Guidelines for Organic Certification of Maple Sap and Syrup. These guidelines are also used for the certification of other tree sap and syrups, such as birch syrup.

The attached eligibility packet also contains some forms that could be used now to get a head start on your application. For example, there is a form for adding new sugarbushes (three year history affidavit) and another affidavit for verifying co-management rights on leased properties. You could print and complete these forms now so they are ready to submit when you apply. You could also collect copies of needed forest management plans, make sure they are current and have complete signature pages, and prepare those for submission (scanned copies can be uploaded or paper copies can be mailed in). You can also look at the VOF sugarbush map guidelines to make sure your map has all the required features, and make sure your record keeping system meets the requirements. A fee sheet is enclosed to help you calculate what your fee will be. Also, note that the Federal Cost Share Reimbursement program has secured funding through 2018, so eligible producers can apply to get 75% of their total certification fee (up to \$750 per scope) reimbursed by September 30, 2018.

You might also want to begin looking into defoamers and make sure you can source a certified organic vegetable oil to meet your needs for the season (get a certificate with bulk/online purchases and check retail labels to make sure it says "certified organic by ____" under the handler information). You could also use a food-grade surfactant reviewed and approved by the Organic Materials Review Institute (OMRI). They have a searchable database at www.omri.org.

Vermont Organic Farmers
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Certified **Organic, Locally** Grown



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Single ingredient value added maple products, (maple cream, maple candy, maple sugar) are covered in a "maple processing" supplement to the maple sap and syrup application. If you are making a processed product that will include more than organic maple syrup as an ingredient, you will need to complete the processing application.

If you choose to represent your products as organic after receiving your certification, note there are specific labeling requirements outlined by the National Organic Program that must be met. Please be sure to send the VOF a proof of any label design for review and approval prior to having labels printed to avoid costly revisions and reprints. An organic labeling FAQ sheet and examples of labels that are compliant and not compliant are enclosed.

If you have general questions about organic production or the any information about organic maple, please feel free to contact us at 802-434-3821 or vof@nofavt.org

Sincerely,

Vermont Organic Farmers Certification Staff

Index:

Section 1: Maple Readiness Checklist

Section 2: VOF Guidelines for Certification of Organic Maple Sap and Syrup

Section 3: Sugarbush Management Standards and Tapping Guidelines for Forestland in Use
Value Appraisal

Section 4: Sugarbush Map Requirements

Section 5: Forest Management Plan and Addendum Requirements Checklist

Section 6: Forms

Verification of 3 Year History of New Sugarbushes

Neighboring Land Use Affidavit

Land Use Affidavit

Section 7: Labeling Resources

VOF Labeling Guidance for Producers (FAQ)

VOF Labeling Examples

Section 8: Fee Sheet



VOF Organic Maple Sap and Syrup Production Readiness Checklist

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Here's a list of most of the things that you as a prospective organic maple producer will need to have in place in order to be certified. It's meant to let you gauge how ready you think you might be and to help you identify the areas you need to focus on in order to be ready for the application and inspection process.

Land Use Verification	
	<p>Verification of land use histories:</p> <ul style="list-style-type: none"> • No substances prohibited in organic production have been applied to any stands used for sap collection in the last three years, • No whole tree harvest (removal of entire trees with crowns in tact to a landing) has occurred in any stands used for sap collection in last three years. <ul style="list-style-type: none"> ○ Form: Verification of 3 – Year History of New Sugarbushes
	<p>Verification of co-management rights on any leased parcels:</p> <ul style="list-style-type: none"> • Used when certified producer's crew does the tapping, repairs, and sap collection on a parcel not owned by the producer. <ul style="list-style-type: none"> ○ Form: Land Use Affidavit
	<p>Verification of neighboring land use:</p> <ul style="list-style-type: none"> • No prohibited substances have been used on neighboring properties, including utility corridors, railroad beds, or guard rails, if an adequate buffer is not in place (see "Buffers" section below). <ul style="list-style-type: none"> ○ Form: Neighboring Land Use Affidavit
Forest Management Plans	
	Each parcel from which sap is collected for use in organic sap or syrup production must be described in forest management plan submitted to VOF.
	Forest management plans must be current (less than 10 years since inventory date).
	Plans must meet current Use Value Appraisal (Current Use) program guidelines.
	Plans must be signed by consulting forester, land owner and county forester.
	<p>Plans must meet VOF guidelines (this could be a separate addendum or update) and name maple sugaring as a principle management activity or objective.</p> <ul style="list-style-type: none"> ○ Form: VOF Forest Management Plan and Addendum Requirements Checklist
	<p>Map shows all features required by VOF guidelines, or, has an overlay that shows these features.</p> <ul style="list-style-type: none"> ○ Reference: VOF Sugarbush Map Requirements

Buffers and Adjoining Land Use	
	<p>Adequate buffers in place between tapped trees and neighboring parcels, utility corridors or road infrastructure if a signed neighboring land use affidavit or equivalent documentation is not on file.</p> <ul style="list-style-type: none"> • 15' to residential properties • 30' of dense hedge row to conventional production or utility corridors • 50' of grass to conventional production or utility corridors
Tapping Guidelines	
	<p>Ability and willingness to follow:</p> <ul style="list-style-type: none"> • VOF tapping guidelines • All applicable sections of the USDA National Organic Program (NOP) "Rule." <ul style="list-style-type: none"> ◦ Reference: VOF Guidelines for Certification of Organic Maple Sap & Syrup
	<p>Pressure treated lumber not in contact with any tapped trees.</p>
Food Grade Equipment	
	<p>Sap and syrup must only touch food grade equipment.</p>
	<p>If galvanized buckets are used, must submit an annual lead test.</p>
	<p>If bronze filter pumps or brass fittings are used, must submit an annual lead test.</p>
	<p>All plastic must be documented food grade, including sap pumps.</p>
Filtering Media	
	<p>Swimming Pool Filters: As of 9/30/15, swimming pool filters from the following companies meet the requirements for plastics and filter materials under Vermont law: Dayton, Dynamo, Hayward, Pac-Fab Superflow, Pentair, Sta-Rite.</p>
	<p>Approved sand to use in swimming pool filters: must use "clean" sand.</p>
	<p>Diatomaceous Earth: must be documented as food grade. Natural DE, Calcined DE and Flux Calcined DE are all approved for use as filtering media.</p>
	<p>Wool or felt liners are allowed as filtering media.</p>
Defoamer	
	<p>Certified organic vegetable oil, with an organic certificate if possible, and always a receipt, or...</p>
	<p>OMRI reviewed and approved food grade surfactant intended for use in food products, with an organic certificate and a receipt.</p>

Record Keeping System	
	Allow for full traceability of inputs and ingredients from purchase through production to sale.
	Readily auditable from raw "ingredient" through finished product production through sales.
	Ensure that the amount of finished product produced and sold balances with the production capacity of the operation.
	Sap producers: Production and sales records, receipts for all inputs (including spouts, tubing, hired labor), forest activity records (tapping dates, tap pulling dates, thinning dates), shared equipment cleaning records.
	Syrup producers: Boiling log, canning log (if applicable), processed product production logs (if applicable), lot numbering system in place for bulk and retail containers, defoamer receipts and certificates (if applicable).
	Maintain all records relevant to operation for 5 years, including materials receipts AND spout number verification.
Additional Documentation	
	Current documentation (less than 2 years old) that wash water (if not from a municipal source) is "bacteriologically acceptable for human consumption" (no E. coli or total coliform detected).
	Verification from equipment manufacturers that all equipment parts that contact sap or syrup are food grade, made for contact with potable water, or lead free, as applicable.
	Annual lead test results from a composite sample of early, mid, and late season syrup if any of the following are used: <ul style="list-style-type: none"> • Galvanized buckets • Bronze filter pumps • Brass fittings not stamped "lead free"
	Current organic certificates and receipts for purchased sap.
	Receipts for all inputs related to the production of organic products.
Annual Certification Cycle	
	Willingness and ability to complete the annual certification cycle: <ul style="list-style-type: none"> • Organic System Plan (OSP) or "application" update, • Certification fee payment within 120 days of the OSP due date (or 120 days after application submission for new producers), • On-site inspection, • Address any points of improvement, conditions for continued certification or non-compliances within the timeframe specified by VOF in the certification decision notification, if applicable.



Guidelines for Certification of Organic Maple Sap & Syrup

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The Vermont Organic Farmers LLC (VOF) guidelines for maple production must be in compliance with the USDA National Organic Program Standards (7 CFR Part 205). In addition, the guidelines are drawn from those practices established in the Vermont State law (6 V.S.A. Chapter 32); the Vermont Department of Agriculture Maple Quality Control Manual; Forest Management and Tapping Guidelines by the Department of Forests, Parks and Recreation; Joint Statement of the North American Maple Syrup Council and the International Maple Syrup Institute on Organic Production of Pure Maple Syrup and from the knowledge and practices developed by organic sugarmakers.

I. INTRODUCTION

All organic maple sap and syrup producers must be familiar with the general requirements of the USDA National Organic Program (NOP). Please contact the VOF office if you do not have a copy of these standards or visit www.ams.usda.gov/nop. The following maple guidelines provide additional information for determining what practices are compliant with the national standards. In addition, producers should make sure they are compliant with Vermont State laws governing the production and labeling of Vermont Maple Syrup.

NOP Section 205.2 defines organic production as, "A production system that is managed in accordance with the Act and regulations in this part to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity."

Organic maple sap and syrup production is defined by the following:

- 1) Cultural practices designed to maintain tree health and ensure long-term preservation of the sugarbush as an ecosystem;
- 2) The prohibition of synthetic materials added at various stages of management and production unless allowed on the National List of Allowed and Prohibited Substances NOP Sections 205.601-602 and 205.605-606.

II. PRODUCTION STANDARDS

All Guidelines are subject to existing Federal, State, and local food handling and sanitation requirements.

A. Sugarbush Management

Organic producers shall take the necessary steps to protect the sugarbush ecosystem. Ideally organic maple sap production should come from a diverse ecosystem and not from a pure maple monoculture. "...Under most circumstances, the creation of a pure maple monoculture is not desirable, as the presence of other species contributes to diversity, increases nutrient cycling, reduces spread of insects and diseases" (p.35 North American Maple Syrup Producer's Manual). However, this diversity may depend on the natural community that the stand starts out as, and it is recognized that due to current, past management, and natural disturbance, many sugar makers have forests and stands with less than the ideal diversity and age distribution of trees. If producers have a sugar maple monoculture and/or even age stand, the forest management plan(s) will need to address diversification of species and regeneration. In addition, "Forest biological diversity is a broad term that refers to all the life forms found within forested areas and the ecological roles they perform. As such, forest biological diversity encompasses not just trees but the multitude of plants, animals and microorganisms that inhabit forest areas and their associated genetic diversity." (D Lindemeyer and J Franklin, Conserving Forest Biodiversity. 2002)

For certification purposes, VOF defines a "sugarbush" as a property that:

- is used for maple sap collection,
- is comprised of one or more contiguous stands as described in a forest management plan that meets the Vermont State Use Value Appraisal (UVA) Forest Management Plan Template and Sugarbush Management Standards for the UVA Program dated October 8, 2014,
- includes one or more "sap collection zones"
 - ✓ A "sap collection zone" refers to a group of red and sugar maple trees whose sap is collected by a conductor, single mainline or a collection of mainlines that drains into a single sap storage tank.
- has one physical address or can be referred to by one physical address.

B. Certification Requirements

- 1) In order to be certified, no synthetic fertilizers, herbicides or pesticides not on the National List shall have been used in the 3 years preceding harvest of an organic crop.
- 2) A written forest management plan is required for each property used for maple sap collection. Forest management plans must meet all components and practices as required by the Vermont State Use Value Appraisal (UVA) Forest Management Plan Template and Sugarbush Management Standards for the UVA Program dated October 8, 2014 and must bear the signatures of the preparer (for example, consulting forester), land owner and county forester. Forest management plans written before March 1, 2016 must include components and practices as required by the Sugarbush Management Standards for the UVA Program dated October 8, 2014 when amended or when they expire. UVA requires

that active management take place based on the current conditions of the stand. Applicants with properties not enrolled in UVA program must still meet the above requirements but should call the VOF office to discuss the county forester signature requirement. Plans expire after 10 years based on the date the forest inventory data was collected. In order to keep their certification in good standing, producers need to submit an updated plan with current data. When a plan is amended less than 10 years after the forest inventory data was collected, a copy of the amended plan with new signatures from the preparer (for example, consulting forester), land owner and county forester will be required.

- 3) In addition to UVA plan components VOF requires the following management practices. A written description of how these management practices will be met must be included in the forest management plan or in a separate addendum. A checklist to assist landowners and consulting foresters draft forest management plans and addendums that are compliant with these guidelines is available upon request from the VOF office.
 - a. Species Diversity: Producers must describe in their forest management plans how forest diversity will be maintained or achieved.
 - b. Ecologically Sensitive Areas: Ecologically sensitive areas, if present, must be identified in the plan and shall be protected.
 - c. Wildlife Habitat: Habitat for wildlife species, including amphibians, birds, aquatic life and mammals, must be addressed in the plan. The plan may address problems such as deer overpopulation as well as preservation or improvement of habitat for rare or endangered species.
 - d. Invasive Species: If the producer decides that control of invasive species is needed, a description of methods used must be included in the plan and must be done without the use of any prohibited herbicides.
 - e. Multiple Age Classes: Producers must describe in their forest management plans how the recruitment or retention of multiple age classes will be achieved. In forests with pre-existing even aged stands of maple trees, a plan to convert the stand to multiple age class management is required. This conversion may be carried out within a time frame appropriate for the site. For example, a series of crop tree release, improvement cuts and/or selection harvests with a rotation age of 150 years could be an appropriate timeline (see Appendix for limits on basal area reduction). In addition, for even age stands, information on why the stand is currently even aged must be included in the plan (for example, grazing in previous years, previous forest management, natural events).
 - f. Thinning Practice/Harvest Techniques: Whole tree harvest (a form of logging in which entire trees with intact branches and crowns, are removed from the

sugarbush) is prohibited in any stand that has tapped trees or has trees that will be tapped within the timeframe of the current forest management plan. Leaving crowns, branches, trees and coarse woody debris smaller than 3 inches in diameter in the forest improves the recycling of biomass, nutrient cycling, and wildlife habitat. Material smaller than 3 inches in diameter must be left in the woods and cannot be removed at a landing and returned to the woods. Deviation from this standard could result in the loss of certification. No whole tree harvest techniques shall be used for a period of 3 years immediately preceding harvest of the organic crop.

g. Residual Stand Damage

- During thinning or harvest, damage to remaining trees must be minimized or avoided.
- Trees with 20% or more harvest-imposed damage must not be considered acceptable growing stock, and must not be counted in the residual basal area.
- Since the roots of maples are close to the soil surface, producers must avoid passing with their machinery too frequently during and outside the production season.
- Any trees or areas of forest with significant root damage or soil disturbance must not be considered acceptable growing stock, and must not be counted in the residual basal area.

h. Forest Soil & Roads

- The number of roads must be kept to a minimum and located so as to minimize damage to roots from soil compaction. However in areas where roads are required, they must be maintained in a manner that prevents soil erosion. For example, this may include ditching, water bars, or maintaining vegetative cover.
- It is recognized that ruts may form in regularly used forest roads (such as main forest roads used daily for access to the sugarbush or sap collecting stations) during sugaring. However producers must manage those areas to prevent soil movement. Examples include bringing in stone or other material, constructing water bars or ditching.
- Minimize soil compaction by keeping travel with heavy equipment in the forest to a minimum.
- If a producer chooses to use fertilizer inputs, fertilization applications shall be in accordance with requirements based on observed and diagnosed deficiencies. Lime and other non-synthetic fertilizers are allowed. Contact the VOF office for a complete list of accepted inputs.
- Water quality must be maintained or improved. Silting/ Sedimentation of streams must be prevented.

- If parts of the sugarbush are going to be grazed this practice must be addressed in the forest management plan to ensure no long-term damage to the sugarbush will occur.
 - i. Trees that are tapped must not be marked with prohibited substances (this includes synthetic paint). Trees painted prior to January 26, 2010 are grandfathered in.
- 4) Maps of each sugarbush must contain the following information:
- a. Location of sugarhouse, collection tanks
 - b. Adjoining land use (hay, forest, corn...)
 - c. Location and acreage of all stands described in the forest management plan
 - d. Number of acres
 - e. Major roads and physical features
 - f. Identification of all areas in the stands where trees are tapped or are planned to be tapped within the time frame of their forest management plan. Stands are defined as homogenous areas (soil type, species, age structure) managed with the same techniques.
 - g. Identify major sap collection zones showing how the sap gets to a single releaser, collection tank or point. Mainline locations are not required.

Features not on the map included with the forest management plan drafted by the consulting forester can be added to the map or an overlay by the producer.

- 5) On rented land, a long-term lease or contract is recommended. Organic producers must be able to provide documentation that verifies that they have co-management rights to the leased or rented property and that the property in question will be under continuous organic management for the duration of the contract.
- 6) All producers seeking certification (new or continuing) must submit an annual Organic Systems Plan (OSP), pay an annual certification fee and have an on-site inspection that occurs during the sugaring season (typically between mid-January and the end of April). The National Organic Program requires that all production facilities and sugarbushes under a certified organic producer's management be inspected annually. A supplemental certification fee may be charged for any applicant who requires additional work by the Review Committee or inspector. Conditions that may require a supplemental fee are as follows: a certification inspection visit that takes longer than 4 hours, an additional audit trail review of a farm or processing application, out-of-state travel, a repeat inspection visit to gather new information or to inspect another part of the farming operation (e.g. all sugarbushes under a producer's management), or inspection of a farmer/processor whose facilities are in different locations. Supplemental work is not included in the initial certification fee and will be charged at cost (inspector's salary and travel), plus an administrative fee.

- 7) In addition to the annual certification inspection, some VOF certified maple producers will receive a summer forest inspection to verify if they are complying with a VOF approved forest management plan. These summer inspections will be randomly selected and VOF will incur the costs of all unannounced inspections.

C. Invertebrate and Vertebrate Pest Management

All relevant production practices should take pest prevention into consideration. Growers must use management practices to prevent pest problems. Once prevention fails, methods of control having the lowest ecological impact should be the first choice. Although “natural” insecticides are widely accepted as organic because of their natural origin and swift decomposition, when over-used they pose a danger to soil organisms, beneficial insects and wildlife, as well as to humans using them. All pesticides, no matter how they are derived, should be handled with caution and used only in accordance with the labeled instructions and Vermont State Law.

Accepted

- Use of mechanical controls such as traps, lures, barriers and sound.
- Biological controls such as release of natural predators and parasites and providing habitat for natural predators
- Microbial and viral diseases, provided no petroleum-based synergists or carriers are used, if the inert ingredients are disclosed and contain only accepted ingredients.
- Habitat modification to discourage vertebrate pests
- Shooting of mammals and birds in accordance with VT state law
- Physical barriers such as fences, netting, etc.
- *Bacillus thuringiensis* (BT) for forest tent caterpillar if all ingredients (including inerts) are approved

*Only when the above practices are insufficient, a producer may use a biological or botanical substances or a synthetic substance from the National List. Many “natural” insecticides are prohibited due to synthetic inert ingredients. **Please refer to VOF’s Product List for Organic Crop Production.***

Prohibited

- Pesticides containing prohibited substances.
- *Bacillus thuringiensis* (BT) for forest tent caterpillar with prohibited inert ingredients

For pest control management in the sugarhouse and other facilities where organic product is handled or stored, management activities must be described in the application and must include exclusion/prevention of pests, good sanitation, and restriction of habitats for pests. Pest logs describing where and when pesticides are used are required for producers who use synthetic controls. Ongoing monitoring and inspection should be performed in the facility to determine the presence and degree of activity of any insect or rodent pests. If a processor does use a synthetic or non-synthetic substance to control pests, this must be listed in their application, including all measures taken to prevent contact of the substance with organic products or ingredients. If measures taken to prevent pests have failed, and if non-synthetic controls and substances from the

National List are also not able to prevent or control pests, a synthetic substance not on the National List may be used provided that the producer and VOF agree on the substance, method of application and measures being taken to prevent contact with the organic product. In the case of fogging and broad surface treatments, organic product must not be contaminated. All food contact surfaces must be covered or otherwise protected from contamination.

D. Tapping Management

Spout placement and techniques used to place the spout must not be done in such a way that compromises the health of the tree. Spouts must be distributed on the trunk following guidelines below.

- 1) It is important to allow long enough dropline lengths (recommend 36"-40") to allow vertical staggering as well as horizontal offsetting of new tap holes. Dropline length should not be less than 24".
- 2) The number of spouts per tree must be based on the diameter of the tree measured at breast height when there is no snow on the ground. Two tapping guidelines exist based on type and size of spout used. They both presume that trees are healthy and capable of growing 1/8" of new wood annually measured at the outside growth rings. The Appendix references the UVA Tapping Guidelines, which are the same but are described using a 2-inch diameter class (For example 10" diameter = 9.0" to 10.9" and 12" diameter = 11.0" to 12.9"). The table below shows the actual minimum diameters.

	<i>Standard Spout (3/16" - 5/16")</i>	<i>Large Spout (7/16")</i>
0 spouts	Less than 9" diameter (less than 28" circumference)	Less than 11" diameter (less than 34" circumference)
1 spout	9-14.9" diameter (28"-47" circumference)	11-18.9" diameter (34"-60" circumference)
2 spouts	15-20.9" diameter (47"-66" circumference)	19" & over, diameter (60" & over circumference)
3 spouts	21" & over, diameter (66" & over circumference)	Prohibited
4+ spouts	Prohibited	Prohibited

It is understood that there will be some deviation from the above table due to human error. More than 10% deviation will be considered deliberate and may result in a non-compliance.

- 3) The depth of the tap hole shall be no more than 2.5 inches from the surface of the bark.
- 4) Retapping a previously tapped tree during the same season (double tapping) or reaming (freshening the tap hole) is not permitted.
- 5) Leaving spouts in trees at the end of the tapping season (60 days after end of sap flow) is not permitted.

- 6) The use of synthetic fungicides, antibiotics, fumigants, sterilants, etc. in contact with trees is prohibited.
- 7) Single use spouts, even when biodegradable, must be removed from the forest when spouts are removed.
- 8) When replacing pipelines and droplines, old material must be removed from the forest within two seasons. This allows for producers to remove old material in two steps by taking down old lines the first year and removing all old lines in the second year. Producers are encouraged to recycle all plastic materials. Contact the Agency of Agriculture for more information.
- 9) For our purposes, a tree is defined as a woody plant with an erect, perennial stem that can reach a size of at least 9.5 inches in circumference at a point 4.5 feet above ground; has a well-defined crown of foliage; and can reach a total vertical height of at least 13 feet (adapted from Little, 1979).

E. Production Equipment, Methods, and Syrup Storage

Sap Collection and Storage Equipment:

Accepted:

- Use of metal and plastic spouts and seals and plastic tubing.
- Wire used to hang mainline must be kept from damaging the trees it is attached to or that support it. Use of nails or bolts must be kept to a minimum and considered as a "spout" if used in an allowable maple tree in the year that the nail or bolt is put in the tree.
- Stainless steel or food grade poly collection tanks (covered if outdoors)
- Vacuum systems maintained to not leak prohibited substances onto the ground, water or sap.
- If a generator or other gasoline or diesel engine is run in the same room that sap is stored in, then the exhaust must be vented to the outside.
- Existing galvanized buckets provided that producers submit annual lead tests. Producers must purchase non-galvanized buckets for replacement purposes. Stainless steel buckets and equipment are encouraged.
- Food grade plastic buckets and bags are permitted.
- All new equipment must have lead- free solder to prevent lead contamination. The intention of all producers should be to move away from equipment (especially pans where the sap is cooked) that contains any lead. Producers that have equipment that may contain lead must submit annual lead tests. For example, bronze gear pump, uncertified brass fittings, etc.

Prohibited:

- Sap storage tanks must either be inside or covered (dome tanks are considered covered). If sap storage tanks are inside there must be no risk of contamination from prohibited substances (exposed insulation, exposed light bulbs without light bulb guards, etc.).
- Synthetic fungicides, antibiotics, fumigants, sterilants, etc. not on the National List are not allowed in contact with trees. As new technology becomes available it is up to the

producer to make sure that new equipment does not contain prohibited materials (i.e. fungicides, antibiotics, fumigants, sterilizers, etc.).

- All galvanized equipment that comes in contact with sap or syrup is prohibited, with the exemption of existing galvanized buckets (see above).
- All plastic that comes in contact with sap or syrup must be food grade (suitable for collecting, containing or storing potable water). Please note that sewer pipe (often green) is not food grade. This is required by the State of Vermont in Title 6 Chapter 32 Section 494 e-l.
- Bronze sap pumps are prohibited.

Sap Filtration and Reverse Osmosis Equipment:

Accepted:

- Use of reverse osmosis, ultra filtration of sap, and ultraviolet light are allowed.
- Pool filters, if used for sap filtration, must use food-grade sand or diatomaceous earth and the plastic that comes in contact with the sap must be food grade. The Agency of Ag maintains a list of allowed pool filters.

Prohibited:

- Sap filtration equipment must be kept clean (no evidence of mold or unsuitable odors) and must not compromise the integrity of the organic product.
- New synthetic filters must be rinsed with potable water prior to use.

Syrup Production, Filtration, Storage and Processing Equipment:

Accepted:

- Defoamers are considered processing aids in the production of organic maple syrup. Processing aids must be approved on the National List (see section 205.605). Processing aids must be produced without the use of genetically modified organisms, irradiation and sewage sludge. In products labeled as 100% organic, processing aids that are agricultural must be organically produced. Accepted defoamers include certified organic vegetable oils. Contact the office if you have questions as to whether a defoamer would be allowed for organic production. Please note that overuse of organic vegetable oils can impart off flavors in syrup. Caution: Food allergies are on the rise. Soy oil, peanut oil and dairy products are known allergens. If an allergen containing defoamer is used, VOF recommends providing information about it on your label. In addition, many bulk maple syrup buyers have specific requirements for approved defoamers. When purchasing defoamer from an equipment supplier, the equipment supplier must be able to provide an organic handling certificate if the defoamer has been repackaged by the equipment supplier.
- Stainless steel, food grade plastic and epoxy-lined drums are allowed (provided interior coating is not chipping or cracking – producer must have protocol to check for this).
- Food grade diatomaceous earth added to syrup before filtering. If DE is used as a filtering agent, the product cannot be labeled as 100% organic. (Please see section IV Labeling) Food grade paper and sand, felt, or synthetic filters may be used.
- All new equipment must have lead- free solder to prevent lead contamination. The intention of all producers should be to move away from equipment (especially pans where

the sap is boiled) that contains any lead. Producers that have equipment with lead solder must submit annual lead tests.

Prohibited:

- ***Synthetic defoamers are not allowed for the production of organic maple syrup products.*** Please contact the VOF office if you have a question about your defoamer. In order to be certified, no synthetic fertilizers, herbicides or pesticides not on the National List shall have been used in the 3 years preceding harvest of an organic crop. VOF does random testing for the presence of synthetic defoamer.
- There must be no risk of contamination of exposed syrup by prohibited substances (exposed insulation, exposed light bulbs without light bulb guards, etc.).
- Drums with chipped epoxy liner, rust, or other imperfections which can impact syrup quality are prohibited.
- Storage containers and boiling equipment shall be made of food grade materials. All equipment must be washed and well rinsed with potable water.
- Direct discharge of wastewater that is above ambient outdoor temperatures into adjacent surface water.
- Storage of pesticides (insecticides, herbicides, fungicides) in the same room where sap or syrup is present.

F. Washing and Disinfection of Equipment

It is required that all equipment be kept clean and free of traces of cleansing agents. Every time cleansing agents or disinfectants are used, filter, pans, seals, and tanks shall be rinsed thoroughly with potable water.

- 1) The building(s) used for reverse osmosis, boiling, and/or canning must have floors that can drain and are washable. Gravel floors are allowed. Dirt floors are prohibited.
- 2) Conventional cleaning products may be used provided that care is taken to avoid any contamination of the organic product.
- 3) Chlorine bleach products that are of sufficient purity to be categorized as a "food grade" substance (as confirmed by the EPA registration number and the manufacturer's intended use statement) may be used up to maximum-labeled rates for disinfecting and sanitizing food contact surfaces. Rinsing is not required unless mandated by the label. If rinsing is required, rinse water must be potable. Producers using food grade bleach solutions to clean tubing are encouraged to trap the chlorine wash so it does not damage the roots of adjacent trees and should consider the fact that most distributors of sugaring equipment do not recommend this practice due to the fact that the salty residue left behind can be attractive to wildlife and result in significant damage to drop lines, lateral lines, mainlines and conductor systems.
- 4) Tubing systems shall not be sanitized with prohibited products during the season of sap flow unless the sanitization is followed by a purge or rinse.
- 5) Reverse osmosis machines and boiling equipment must be thoroughly rinsed after the use of any cleaning chemicals or preservatives. The producer must have a protocol to verify that

the quantity and quality of water used in this rinse is adequate. This does not have to be documented each time with cleaning records.

- 6) Before putting syrup into drums for storage, producers must clean and rinse barrels to ensure that syrup does not come in contact with a contaminant. If barrels are cleaned and rinsed by the buyer, producers must have a copy of the buyer's protocol for review to submit as part of the OSP unless that buyer is certified as an organic handler.

III. RESIDUE TESTING

Residue testing of organic syrup may be required when there is reason to believe that the syrup has come into contact with a prohibited substance or has been produced using excluded methods. During the annual inspection or on a separate site visit, VOF may randomly select a container (open barrel or retail unit) to take a sample for analysis. These samples may be analyzed for lead content, synthetic defoamer and any other residue of concern.

If an operation uses galvanized buckets, they will be asked to provide documentation that the lead equipment is not contaminating the organic syrup. Any syrup with lead levels above 250 ppb cannot be sold as organic. Producers with samples above the 250 ppb lead level must also reassess their management and equipment and submit proposed changes in writing to the VOF Review Committee. Certification continuation or renewal will depend upon the implementation of this proposal and a new lead test showing levels below 250 ppb.

VOF will do periodic residue testing on no less than five percent of the total number of certified operations annually. Such tests will be arranged by VOF and expenses paid for by VOF. A representative of VOF will perform the sampling. Sample integrity will be maintained throughout the chain of custody, and residue testing will be performed in an accredited laboratory. Chemical analysis will be made in accordance with the methods described in the most current edition of the Official Methods of Analysis of the AOAC International or other current applicable validated methodology determining the presence of contaminants in agricultural products (§ 205.670). VOF will also follow and keep up to date with instructions from the NOP regarding sample collection and testing.

Results of residue testing must be submitted to the Administrator of AMS, USDA, the producer, and made available to the public if not part of an on-going compliance investigation. If test results indicate a specific agricultural product contains pesticide residues or environmental contaminants that exceed the Food and Drug Administration's or the EPA's regulatory tolerance, VOF is required to promptly report the data to the Federal Health Agency whose tolerances have been exceeded.

IV. LABELING

Producers must submit their labels to VOF for approval prior to sale. For those producers who are applying only their farm sticker and VOF logo sticker to their product, they are not required to meet the label requirements as set forth below (for example, adding the phrase "certified by VOF".)

- 1) 100% Organic
Products represented as 100% organic must contain 100% organic ingredients including

processing aids. For example, producers using food grade diatomaceous earth as a filtering agent may not label their product as 100% organic.

Products in the 100% organic category may be labeled anywhere on the package as “100% organic” or “organic” and may indicate ingredients individually as organic in the ingredient statement. Producers may use the USDA seal and the VOF logo. However, if a producer chooses to use both logos, the VOF logo may not be more prominent than the USDA seal. On the information panel below information identifying the handler or distributor, the certifying agency of the handler must be identified with a phrase such as “Certified organic by Vermont Organic Farmers” or “Certified by VOF” with no intervening text between the handler information and the phrase identifying the certifier.

2) Organic

Products represented as “organic” must contain at least 95% organic ingredients. The remaining 5% must also be organic unless those ingredients are not commercially available. This 5% may also include non-agricultural substances (such as food grade diatomaceous earth) from the National List §205.605. These non-organic ingredients must not be produced using genetic engineering or sewage sludge or be irradiated.

Products in this category may be labeled anywhere on the package as “organic” and may use the USDA seal and the VOF logo. However, if a producer chooses to use both logos, the VOF logo may not be more prominent than the USDA seal. Producers must indicate each organic ingredient in the ingredient statement. On the information panel below information identifying the handler or distributor, the certifying agency of the handler must be identified with a phrase such as “Certified organic by Vermont Organic Farmers” or “Certified by VOF” with no intervening text between the handler information and the phrase identifying the certifier.

If you list the percentage of organic ingredients in the product, the size of the percentage statement must not exceed ½ the size of the largest type size on the panel on which the statement is displayed and must appear in its entirety in the same type size, style, and color without highlighting.

If your product is labeled as both “organic” and “contains 100% pure maple syrup”, please be sure that it is not misconstrued that the product is also 100% organic. VOF will not approve labels where 100% pure and organic are on the same text line.

V. VALUE ADDED

If you produce any value-added products (such as maple candy or maple sugar) that you plan to represent as organic, you will need to keep records sufficient to track all raw ingredients to the sale of the final product. Required records include production logs, lot numbers, and sales records.

Please refer to the VOF Guidelines for Organic Certification of Processed Products for more information on certifying processed products. Please note if the gross sales from your value-added products total more than \$5,000, you will need to fill out a complete processing application.

VI. AUDIT TRAIL

Audit trail and inventory control procedures must be readily auditable and detailed enough to trace all sap/syrup from the supplier, through the entire manufacturing process, and on through the distribution system to the retailer, using lot numbers or identifiable codes. It is required to have sequential coding or lot numbers on the storage barrels and containers to be able to identify all syrup and allow traceability of syrup back to date of boiling and canning. A production log must be kept that shows how much syrup was produced on each day of boiling and how much syrup was repackaged on each day of canning. Producers certified only for sap production must maintain records of how much sap was collected in total.

All records, including production records, receipts for inputs such as purchased organic sap and defoamers, receipts for equipment and supplies including number of spouts installed, purchase orders, bills or inventory records, and sales records must be made available for the inspector to review and must be kept for 5 years.

APPENDIX: Sugarbush Management Standards and Tapping Guidelines for Forestland in Use Value Appraisal

Sugarbush Management Standards and Tapping Guidelines for Forestland in Use Value Appraisal

The purpose of this document is to describe the forest management standards on enrolled forestland with trees tapped for maple sap. At the end of this document are the tapping guidelines. The term "shall" is used for mandatory requirements and the term "should" is used when practices are recommended.

While production of a food product such as maple syrup is an agricultural activity in which the processing of sap to maple syrup occurs in the sugarhouse, management of a woodlot for sap production is a forestry activity. A sugarbush is not agricultural land but a forested ecosystem with multiple values, products and services and -- like any forestland -- should be managed with these products and services in mind, including water quality, biodiversity, wildlife habitat, and value-added forest products.

The following standards shall be followed in sugarbush management on stands enrolled in Forestland UVA:

- There should be long-term planning for the recruitment or retention of multiple age classes (uneven-aged management is recommended, though even-aged management may be allowed). When regenerating a forest stand, hybrid silvicultural systems are also possible including continuous cover, and shelterwood with reserves.
- Since the basis of any long-term forest-based management activity, such as sugaring, is a healthy forest, minimum residual stocking standards for sugarbush management shall be the same as the minimum residual stocking standards for northern hardwood stands managed for sawtimber. See appropriate guides in UVA Manual Appendix A.
- No single entry while tending the forest with intermediate treatments should reduce stocking by more than one-third, and residual stocking shall be expected to consist of healthy, vigorous trees with sound structure. Harvesting more than one third in any entry may cause sunscald, windthrow, epicormic branching or susceptibility to drought.
- It is understood that emphasis in a sugarbush is on maple sap production and the species of principal interest will be sugar maple and/or red maple. To avoid a monoculture, landowners and managers shall retain a minimum of 25% of total basal area in a combination of non-sugar maple species. (Note: It is recommended that the most varied suite of species found in the forest community be maintained or encouraged. This could include "up to" 8-11 species.) A variance of the 25% may be approved by the county forester if the landowner justifies the change. In instances when the stand, prior to harvest, already has less than 25% non-sugar maple trees, the percent residual non-sugar maple stocking shall not be less than pre-treatment and the management plan shall address ways to increase these percentages over time.
- Sugarbush management often includes the maintenance of saplines which may include annual clearing of trees, saplings and woody material from under, above, and near lines. The amount of woody material removed while clearing lines should be minimized to keep negligible any effect on the basal area, and in most cases it should be left on the ground to enhance coarse woody material. Beyond cutting for line clearing any additional harvesting for fuelwood or salvage shall be quantified in the plan with either a basal area target, number of crop trees to be released, or by indicating the volume to be removed from any stand.

- For purposes of UVA, Acceptable Growing Stock (AGS) is based on timber quality of the merchantable stem; trees that are healthy, vigorous, and single stemmed with minimal defect from rot, wounds or branches. It is recognized that a good sap producing tree may not be an acceptable timber tree. However, the definitions for AGS and Unacceptable Growing Stock (UGS) will remain the same for enrolled forest land managed for maple sap production to prevent potential high-grading which would adversely affect forest management options in the future. *Note: Large diameter UGS may be retained for tapping purposes as long as the ratio of UGS to AGS is not higher post-harvest.*
- Conversion of a stand to sugarbush use may require special consideration in those natural communities where maple is an associate species of lesser abundance. Every stand should be managed with consideration of the natural community type, tapping the maples only as feasible. Examples of such types are Red Maple Swamps, Riparian Silver Maple Forests (both present problems with equipment and fragile soils), Hemlock-Northern Hardwood, Red Spruce-Northern Hardwood, and Sandplain Forests with oak and pine as dominants and red maple as an associate. While these forest communities can contain large numbers of maple they should not be managed toward any single species or converted to a maple monoculture by harvesting only the dominant oak, pine, spruce, tamarack or ash.
- Sugarbushes shall be mapped following the UVA mapping standards. The stand will be identified using Stand Type based on SAF Cover Type or Vermont's Natural Communities as per UVA guidelines. The UVA map shall also include the identification of those stands that are tapped or have plans to be tapped within the plan time frame.
- All taps shall be removed annually at the end of each sugaring season before full maple leaf out. Used tubing, mainlines and drop-lines should be removed from the woods, when replaced or when the sugarbush is no longer tapped.

The **UVA Tapping Guidelines** below shall be referenced in the forest management plan on a stand level where trees are tapped or are planned to be tapped within the time frame of the current plan and a copy of these Guidelines should be included in the landowner's copy of their forest management plan. Taps per tree should not exceed the number of taps in the table below (these are within 2-inch diameter classes). Droplines of 30-36 inches are recommended.

	Standard Spout (5/16")	Large Spout (7/16")
0 taps	Less than 10" diameter (less than 29" circumference)	Less than 12" diameter (less than 35" circumference)
1 tap	10-14" diameter (29-47" circumference)	12-18" diameter (35-60" circumference)
2 taps	16-20" diameter (47-66" circumference)	20" & over, diameter (60"+ circumference)
3 taps	22" & over, diameter (66" & over circumference)	Prohibited
4+ taps	Prohibited	Prohibited



VOF Sugarbush Map Requirements

Vermont Organic Farmers, LLC (VOF)

Northeast Organic Farming Association of Vermont (NOFA-VT)

VOF Office: 802-434-3821 vof@nofavt.org www.nofavt.org

The maps that are included with most forest management plans often do not provide VOF staff or inspectors with all of the information they need to accurately assess the areas of a property that contain infrastructure related to maple sap collection. This makes it difficult to verify buffer zones, estimate the time needed to complete inspections, and to ensure all production areas are inspected as per the National Organic Program requirements. In addition, the Use Value Appraisal program has revised their guidelines regarding sugarbush map requirements. VOF's alignment of the organic maple sap and syrup guidelines with the new Use Value Appraisal guidelines means that their map requirements need to be met in addition to VOF's.

The VOF guidelines for organic certification of maple sap and syrup require that the producer submit maps of all sugarbushes being tapped which include the following:

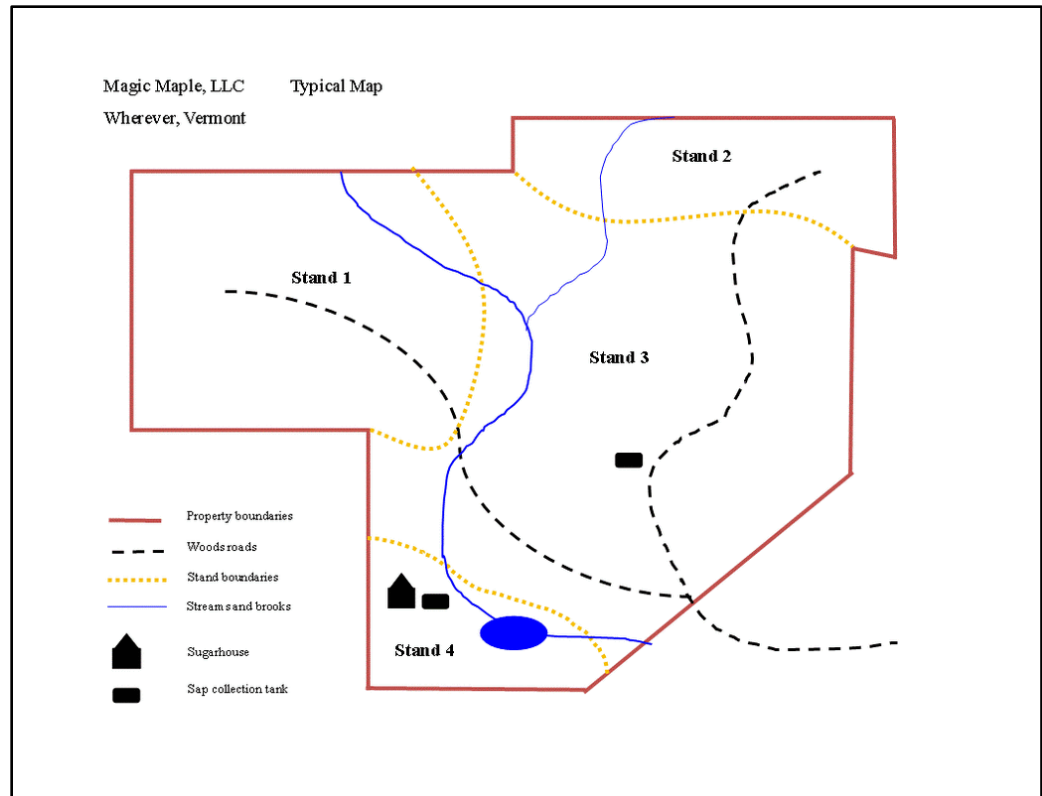
- location of sugarhouse and collection tanks, adjoining land use (hay, forest, corn...),
- location and acreage of all stands described in the forest management plan,
- number of acres,
- major roads and physical features,
- identification of all areas in the stands where trees are tapped or are planned to be tapped within the time frame of their forest management plan, and
- identify major sap collection zones showing how the sap gets to a single releaser, collection tank or point. Mainline locations are not required.

Features not on the map included with the forest management plan drafted by the consulting forester can be added to a copy of the map or to an overlay by the producer.

Typical Map:

The map to the right is typical of maps submitted with forest management plans.

Even if drawn over an aerial photo, it does not clearly indicate where the tapped trees are, how sap gets to the sugarhouse, stand acreage, where expansion of the tapped area might occur during the time frame of the plan, or how adjacent land is used.



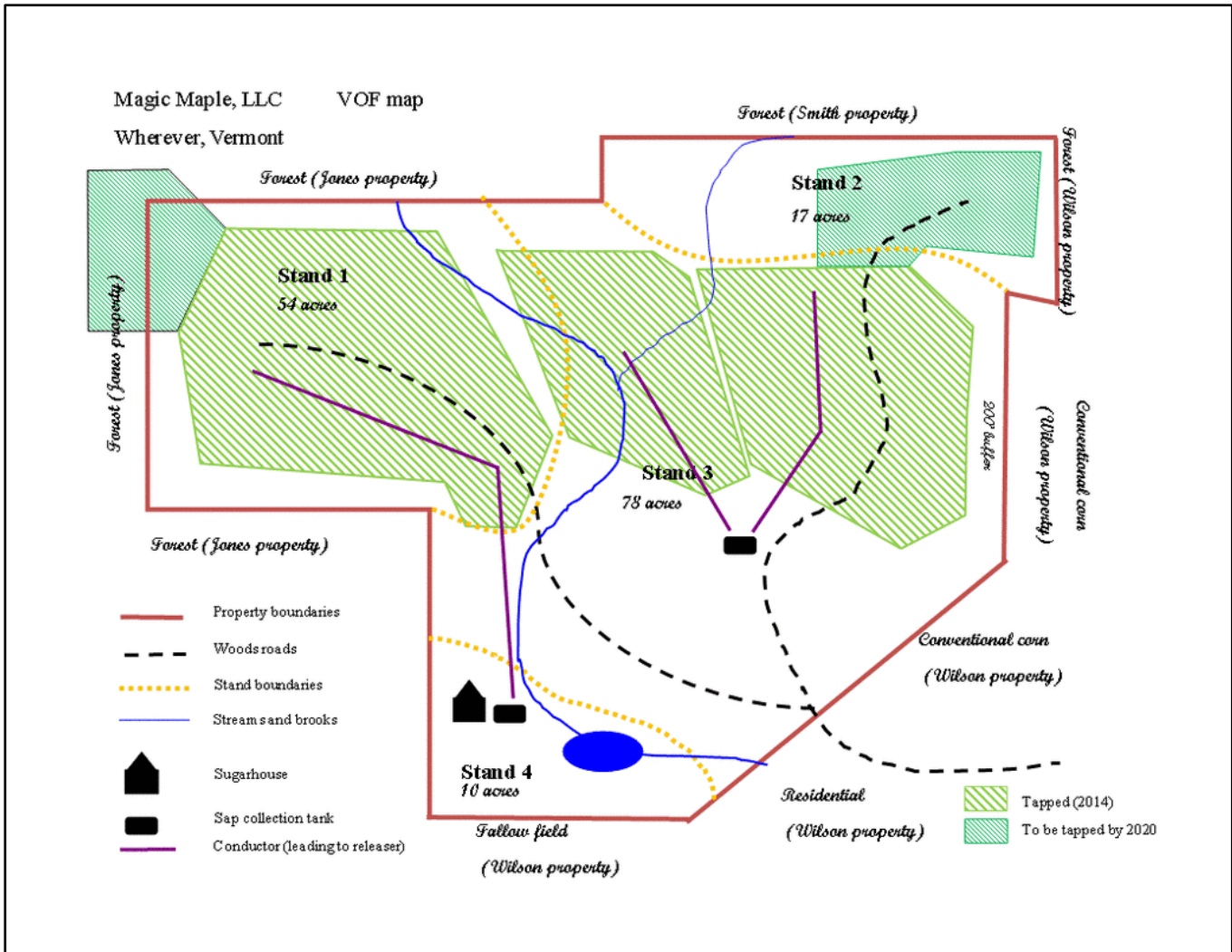


VOF Sugarbush Map Requirements

Vermont Organic Farmers, LLC (VOF)

Northeast Organic Farming Association of Vermont (NOFA-VT)

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Sugarbush Map Meeting VOF and UVA Guidelines:

The map above clearly indicates conductor systems and outlines areas that contain taps (light green). It also includes areas in which taps are expected to be installed during the timeframe of the UVA approved forest management plan (dark green). The to-be-tapped area in the upper left indicates that another forest management plan describing the tapped area of the "Jones property" will be required, as would documentation verifying that the Jones parcel had not substances prohibited in organic production applied in the last three years.

Note that main lines are not required. Here, "conductor systems" refers to the widest diameter tubing used to transport sap from a sugarbush to a sap collection tank/releaser.

Additional information shown can be added directly to a copy of the original map or to a transparent "overlay" that can be placed on the original map.



VOF Forest Management Plan and Addendum Requirements Checklist

Vermont Organic Farmers, LLC (VOF)
 Northeast Organic Farming Association of Vermont (NOFA-VT)
 VOF Office: 802-434-3821 vof@nofavt.org www.nofavt.org

The following is a checklist designed to help consulting foresters develop forest management plans and forest management plan addendums for maple producers seeking new or continued organic certification through Vermont Organic Farmers (VOF). Maple producers should provide their consulting forester with a copy of this checklist and a copy of the VOF Guidelines for Certification of Organic Maple Sap and Syrup (February, 2016).

A written forest management plan is required for each property used for maple sap collection. Forest management plans must meet all components and practices as required by the Vermont State Use Value Appraisal (UVA) Forest Management Plan Template and Sugarbush Management Standards for the UVA Program dated October 8, 2014 and must bear the signatures of the preparer (for example, consulting forester), land owner(s) and county forester. Forest management plans written before March 1, 2016 must include components and practices as required by the Sugarbush Management Standards for the UVA Program dated October 8, 2014 when amended or when they expire. UVA requires that active management take place based on the current conditions of the stand. Applicants with properties not enrolled in UVA program must still meet the above requirements but should call the VOF office to discuss the county forester signature requirement. Plans expire after 10 years based on the date the forest inventory data was collected. When a plan is amended less than 10 years after the forest inventory data was collected, a copy of the amended plan with new signatures from the preparer (for example, consulting forester), land owner(s) and county forester will be required.

Consulting foresters should attach a copy of the completed checklist to the finished plan or addendum(s) when it is submitted to the producer or to the VOF office.

Please do not hesitate to contact the VOF office with questions regarding the guidelines or to request additional information. Both the checklist and the guidelines are available upon request from the VOF office in both paper and electronic forms.

Consulting Forester:	
Forest Management Plan Title:	
Name of Producer Requesting Certification:	
Name of Producer's Operation:	
Property Owner:	
Property Location:	
Original Forest Management Plan Author:	
County Forester:	
Date FMP Written (most recent version):	
FMP Expiration Date:	



VOF Forest Management Plan and Addendum Requirements Checklist

Vermont Organic Farmers, LLC (VOF)

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Page Number or Attachment Location	VOF FMP and Addendum Requirements (if a requirement is not applicable to the plan for the parcel, please enter "N/A")
	Forest management plans must be signed by the county forester, indicating that the plan meets all components as required by the Vermont State Use Value Appraisal (UVA) Forest Management Plan Template and Sugarbush Management Standards for the UVA Program dated October 8, 2014.
	Date inventory data was collected.
	A description of how forest tree species diversity will be maintained or achieved.
	Diversity Requirements: Post-conversion residual stands must be at least 25% non-sugar maple trees or the species diversity must not be less than pre-conversion percentages.
	Diversity Requirements: If the forest management plan includes stands where diversity is less than 25%, a description of how past management resulting in current tree species diversity must be included. VOF will not certify sugarbushes converted to sap production using whole tree harvest techniques within the last three years.
	Ecologically sensitive areas, if present, must be identified in the forest management plan and shall be protected.
	Stand Regeneration: Forest management plan must include a regeneration plan.
	Diversity Requirements: If all stands described in the forest management plan are less than 25% tree species diversity the following additional information must be attached and will be presented to the VOF Review Committee for evaluation: <i>A forest management plan that profiles adjacent land under someone else's management and describes how these surrounding forests achieve diversity within the larger ecosystem. This plan must include an aerial photograph at a landscape level.</i>
	Habitat for wildlife species, including amphibians, birds, aquatic life & mammals must be addressed in the forest management plan. The forest management plan may address problems such as deer overpopulation as well as preservation or improvement of habitat for rare or endangered species.
	If producer decides that control of invasive species is needed, a description of methods used must be included in the plan and must be done without the use of any prohibited herbicides.



VOF Forest Management Plan and Addendum Requirements Checklist

Vermont Organic Farmers, LLC (VOF)

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	Stand Regeneration: Plans must describe how recruitment or retention of multiple age classes will be achieved. If stand is even age, a plan to convert the stand to un-even age management is required within a time frame appropriate for the site. For example, a series of crop tree release, improvement cuts and/or selection harvests with a rotation age of 150 years could be an appropriate timeline. In addition, for even age stands information on why the stand is currently even aged must be included in the plan (for example, grazing in previous years, previous forest management, natural events).
	Thinning Practice/Harvest Techniques: Prescribed activities must meet or exceed the Use Value Appraisal minimum standards and be carried out in accordance with U.S. Forest Service or other appropriate silvicultural or management guides or handbooks. (See Appendix A of the Use Value Appraisal Manual-Partial List of Acceptable Forest Management Publications).
	Thinning Practice/Harvest Techniques: The forest management plan must include a description to leave material (branches and woody debris) smaller than 3 inches while harvesting and or thinning.
	Thinning Practice/Harvest Techniques: The forest management plan must include a description of how damage to remaining trees will be minimized or avoided during thinning and how frequency of using machinery will be minimized.
	The forest management plan must include a description of how roads will be kept to a minimum and located so as to minimize damage to roots from soil compaction. In addition the forest management plan must include a description of how roads will be maintained in a manner that prevents soil erosion. For example, this may include ditching, water bars, maintaining vegetative cover.
	The forest management plan must include a description of how regularly used forest roads will be managed to prevent soil movement. Examples include bringing in stone or other material, constructing water bars or ditching.
	A description of inputs used for fertilization if applicable.
	A description of how water quality will be maintained or improved and how silting or sedimentation of streams will be prevented when applicable.
	If parts of the sugar bush are going to be grazed this practice must be addressed in the forest management plan to ensure no long-term damage to the sugar bush will occur.
	A description of how tapped trees will be marked without the use of prohibited substances including paint. Trees painted prior to January 26, 2010 are grandfathered in.



VOF Forest Management Plan and Addendum Requirements Checklist

Vermont Organic Farmers, LLC (VOF)

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	<p>Maps of each sugarbush must contain the following information:</p> <ul style="list-style-type: none">a. Location of sugarhouse, collection tanksb. Adjoining land usec. Location and acreage of all stands described in the forest management pland. Number of acrese. Major roads and physical featuresf. Identification of all areas in the stands where trees are tapped or are planned to be tapped within the time frame of their forest management plan. Stands are defined as homogenous areas (soil type, species, age structure) managed with the same techniques.g. Identify major sap collection zones showing how the sap gets to a single releaser, collection tank or point. Mainline locations are not required. <p><i>Features not on the map included with the forest management plan drafted by the consulting forester can be added to the map or an overlay by the producer.</i></p>
Additional Comments:	



VOF Verification of 3-Year History of New Sugarbushes

Vermont Organic Farmers, LLC (VOF)

Northeast Organic Farming Association of Vermont (NOFA-VT)

VOF Office: 802-434-3821 vof@nofavt.org www.nofavt.org

Applicant Name: _____

Business Name: _____

This form is to verify that no materials prohibited by the USDA National Organic Program have been applied in the last three years, and that whole tree harvest techniques have not been used in the last five years, in a sugarbush (or sugarbushes) that a new or continuing applicant wishes to add to their certified organic maple operation. **If the property has been owned and/or managed by the applicant for the last three years, it is to be signed by the applicant. If the property has been owned/managed for the last three years by someone other than the applicant, it is to be signed by the previous manager.**

Please note that VOF defines a sugarbush as a property that meets the following criteria:

- is used for maple sap collection
- is comprised of one or more contiguous stands as described in a forest management plan that meets the Vermont State Use Value Appraisal (UVA) Forest Management Plan Template dated April 1, 2010
- includes one or more "sap collection zones" (groups of red and/or sugar maple trees whose sap is collected by buckets, a single mainline or a collection of mainlines that drain into a single sap storage tank)
- has one physical address or can be referred to by one physical address

Sugarbush Name or Identification Number	Title of Forest Management Plan Describing Stands Used for Sap Collection	Location (town)	Acreage of Stands Used for Sap Collection	Number of Spouts

"I verify that the above parcels have been under my management and that they have had no materials prohibited by the USDA National Organic Program applied to them for the last three years, nor have whole tree harvest techniques (removal of entire trees with crowns intact from the forest to a landing) been used in the last five years."

Signature of Land Manager: _____

Date: _____

Name of Land Manager (print): _____

If this form is signed by someone other than the applicant, please provide the former land manager's current contact information below:

Address: _____

Primary phone: _____ Email: _____



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Neighboring Land Use Affidavit

This form is to be used by certified producers to document that they have communicated with landowners that prohibited materials are not used adjacent to certified land.

Certified Farm Name: _____

Farmer Name: _____

Neighboring Landowner Name: _____

Neighboring Landowner Phone Number: _____

Adjacent Property Is In... _____

Agricultural Use: Hay Corn Other: _____

Non-Agricultural Use: Residential/Lawn _____

What inputs are applied to the neighboring property? _____

Does the neighboring landowner maintain a buffer from your certified fields? _____

If yes, what size is the buffer? _____

Which certified organic field(s) does this property border? _____

I, _____, do verify that I have communicated with the adjacent landowner regarding their land management practices over the previous three years.

I have confirmed with my neighbor that no materials considered prohibited by the USDA National Organic Program (NOP) have been applied to their property for three years within the buffer distances described below.

If prohibited materials have been applied to the adjacent property within the buffer distances below in the past 3 years or are applied in the future, I agree to maintain an appropriate buffer to harvested certified organic crops within the field under my management.

Signature of certified organic farmer: _____ Date: _____

When is a Buffer Needed?

VOF recommends organic producers maintain a minimum 50-foot buffer zone from adjacent agricultural land that uses substances prohibited by the NOP, unless the buffer consists of a dense hedgerow. In this case, a 30-foot minimum buffer may be sufficient.

VOF recommends organic producers maintain a 15-foot buffer from residential properties that use prohibited substances.

Buffer zones must be maintained for at least three years after the last application of prohibited pesticides or fertilizers on adjacent land.



VOF Certified Organic Maple Sap and Syrup Production Land Use Affidavit

Vermont Organic Farmers, LLC (VOF)
Northeast Organic Farming Association of Vermont (NOFA-VT)
VOF Office: 802-434-3821 vof@nofavt.org www.nofavt.org

Who should use this form: The purpose of this form is to verify that the certified organic producer has co-management rights to any parcels used for collecting tree sap for syrup production that they don't own.

Certified organic producer name: _____

Certified organic business name: _____

Land owner name: _____

The signatures below verify that:

- The certified producer will use _____ acres of stand(s) _____ of the property owned by _____ and described in the forest management plan titled _____ for the property located in _____ written by _____ dated _____ (hereby referred to as "the parcel") for certified organic sap production and that the certified organic producer has co-management rights to the parcel with respect to the trees, understory, soil and infrastructure used for sap production for the duration of this agreement (start date: _____ end or renewal date: _____).
- All actions that impact the parcel (including, but not limited to, installation of sap collection infrastructure, timing and techniques used for scheduled thinning prescribed by the forest management plan, forest road maintenance, control of invasive species, tree marking) must be agreed upon by both the certified organic producer and the land owner prior to implementation.
- Employees or other responsibly connected parties of the certified organic producer's operation will be responsible for all labor related to the collection of maple sap and maintenance of the maple sap collection infrastructure on the parcel.

Signed:

Certified Organic Producer Name

Date

Land Owner Name

Date



VOF Labeling Guidance for Producers

Vermont Organic Farmers, LLC (VOF)

Northeast Organic Farming Association of Vermont (NOFA-VT)

VOF Office: 802-434-3821 vof@nofavt.org www.nofavt.org

IMPORTANT! Always send a label proof to the VOF office for review and approval prior to having it printed.

Organic product labeling regulations overview

According to the National Organic Program (NOP), any product which bears a label that makes an organic claim must be labeled in accordance with the NOP Rule. Organic product labels are required to include a phrase identifying the certification agency responsible for the certification of the final product. Often times for VOF certified producers, this statement reads 'certified organic by Vermont Organic Farmers'. It is required that this, or a similar phrase, be located on the information panel of the label directly below the information identifying the handler of the finished product without any intervening text.

In addition to the handler information and 'certified by...' phrase requirements, an organic product label is required to identify all organic ingredients in the ingredient statement as organic. This can be done by including the word organic to describe the ingredient or by using a reference mark (such as an asterisk) and defining that mark below the ingredient statement to indicate that the ingredient is organically produced.

Please refer to the VOF Guidelines booklet for additional *optional* labeling guidelines.

VOF uses the FDA labeling regulations to answer the following questions: *For more information about FDA labeling regulations please visit the FDA website at www.fda.gov*

Q: What is the information panel?

A: The information panel, as defined by the FDA, is the label panel immediately to the right of the principal display panel, as displayed to the consumer. If this panel is not usable, due to package design and construction, (e.g., folded flaps), then the information panel is the next label panel immediately to the right. The information panel is not defined by the placement of the nutritional information and ingredient statement although that information is often found on the information panel.

Q: What is the Principal Display Panel (PDP)?

A: The PDP, as defined by the FDA, is the portion of the package label that is most likely to be seen by the consumer at the time of purchase.

Q: What is the information identifying the handler of the finished product?

A: Also referred to as 'handler information', this information is defined by the FDA's name and address requirements, and *must* include the name and address of the manufacturer, packer or distributor. Unless the name given is the actual manufacturer, it must be accompanied by a qualifying phrase which states the firm's

relation to the product (e.g., "manufactured for" or "distributed by"). Handler information must also include street address if the firm name and address are not listed in a current city directory or telephone book; city or town; state; and zip code.

Q: What is intervening text?

A: Intervening text is considered any text, image, or graphic element that appears to divide the handler information and the phrase 'certified organic by Vermont Organic Farmers'. Exceptions to this rule are telephone number, website information, e-mail address, social media links, plant identification numbers, and the VOF logo. These exceptions may be included with the handler information and will not be considered intervening text. However, these exceptions alone may not take the place of the required handler information.

Frequently asked questions

VOF producers create labels unique to their operation and we recognize that labels come in many shapes, with varying numbers of panels, in many sizes, and with many differing layouts. Below are answers to frequently asked questions that address these variations.

Q: Does the handler information have to be found together or can it be broken up and located in different places on the label?

A: Complete handler information must be found together (most often in a block format), with the 'certified by...' phrase located directly below without any intervening text. Producers with labels that have handler information elsewhere on the label, such as their business name, may need to repeat their business name and other handler information in the handler information 'block' for the label to be considered compliant.

Q: Can my personal name be included as part of the handler information?

A: Yes, your personal name may be included and will not be considered intervening text if included in the handler information.

Q: Can the 'certified by...' phrase be found on a label more than once?

A: Yes. As long as it is located in the required spot, it may also be found elsewhere on the label.

Q: Can my business name appear in a different font than the rest of the handler information?

A: Yes.

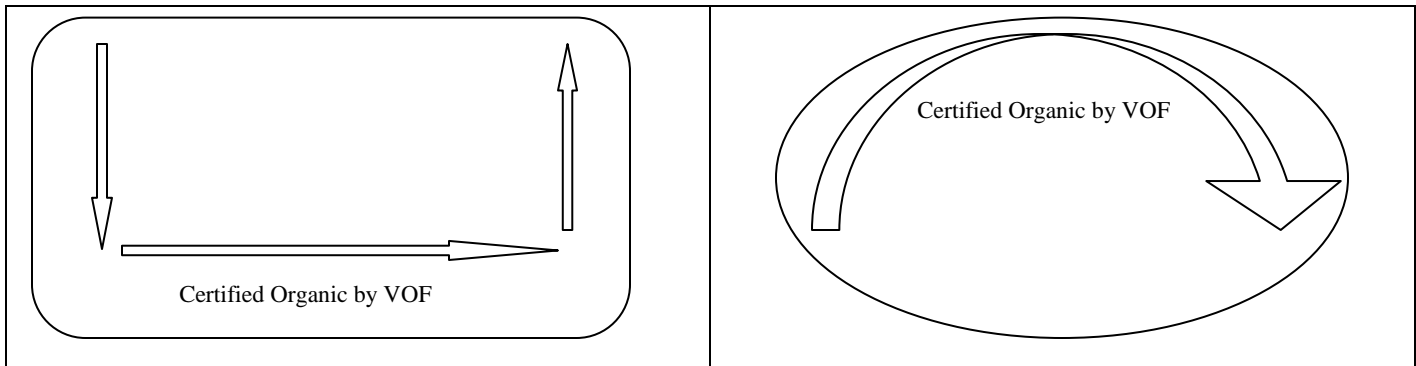
Q: Can the VOF certification logo take the place of the 'certified by...' phrase?

A: No. The VOF logo may be used on a label but does not take the place of the required phrase.

Q: Can the handler information be located on the perimeter of a single panel label?

A: Only if the handler information is listed together in a continuous manner, starting at the top left and following the perimeter of the label to the top right with all text going in the same direction. The 'certified by...' phrase must be placed directly under the handler information with no intervening text. Alternately, the handler information could be listed together in a continuous manner, starting at the bottom left and following the perimeter of the label to the bottom right with all text going in the same direction. The 'certified by...' phrase must be placed under the handler information with no intervening text.

Example: Arrows illustrate direction of handler information



Q: Can a farm/processor logo which includes the business name take the place of the 'business name' portion of the handler information block?

A: Yes. But *only* on single panel labels and *only* if the logo is placed directly above the business address, zip code, and 'certified by...' phrase. Note that the logo itself may contain images and text which would otherwise be considered intervening. As long as the images and text are part of the logo, this is allowed.

Q: Can my web address take the place of my business name?

A: Only if the web address has been registered as an official business name of the organization.

Q: What about non-food labels such as seed packets? Are they required to list complete handler information?

A: Yes. All organic product labels, whether they are food or non-food labels must follow the same labeling regulations as outlined above.

Q: What types of items are not considered labels and therefore do not require handler information and the 'certified by...' phrase?

A: PLU stickers, rubber bands, farm contact information stickers, VT State syrup jugs and tins.

Q: Do my wholesale boxes need to have labels on them?

A: No. However, according to the NOP, any container which is used only for the storage or shipping of raw or processed agricultural products must display the production lot number if applicable.

Q: Do my packaged meat labels have to follow this guidance?

A: Yes. You are required to supply your slaughter facility with compliant labels that they will use on your certified organic packaged meat. It is important to note that you may not use a label which makes an organic claim on packaged and processed meats which are not certified organic (sausage made by the slaughterhouse, for example).

Q: Does my product have to have a label?

A: VOF must ensure that any certified organic product which is marketed or otherwise labeled as organic complies with the regulations. However, organic regulations do not dictate when a product must bear a label.

Q: Can my maple syrup label make the claim "100% pure organic maple syrup"?

A: Only if the statements "100%" and "organic" are located on different lines so as to not make it appear that the product is "100% organic".

Example: **Compliant:** 100% Pure

Organic maple syrup

Noncompliant: 100% pure organic maple syrup

Q: If I have a split operation and produce both organic and non-organic products, how may I label my non-organic products?

A: Products which are not certified organic may not be labeled or otherwise marketed as organic. If certified organic ingredients are used to create a processed product but that product is not certified itself then the organic ingredients may be identified as organic in the ingredient statement. An organic claim may not be made on any product which is not certified. The phrase 'certified organic by VOF' or 'X Farm is certified organic by VOF' may not be used on labels of non-certified products even if the ingredients used to produce the product are certified by VOF.

Q: How do I make sure that my label is compliant?

A: Always submit a copy of your label proof to the VOF office for approval *prior* to having it printed. This will ensure that your label meets current NOP regulations and will help you avoid unnecessary work and cost associated with having a label that is not compliant.

Q: Our value added products in our farm store are not certified organic but we use 100% organic ingredients. What is the best way to label these items?

A: The word 'organic' may not be used on labels or marketing materials for products which are not certified organic (unless the product qualifies as exempt per the NOP regulations). Organic ingredients may be identified as such in the ingredient statement only.

Q: VOF approved my label but now I am being told that I have to make more changes. Why is this?

A: The NOP offered labeling clarification to certifiers which resulted in the need for VOF to adjust how we interpret the Rule. Although VOF approved your label in the past, we may have done so under our previous assumptions. We are now interpreting the Rule differently and therefore must review labels differently. Please note that VOF will work with producers to ensure that time and cost associated with label revisions is minimized to every extent possible.

Q: I like the old VOF logo. Can I continue to use it?

A: No. It has been VOF policy to allow producers to exhaust their supply of labels which use the old VOF logo. However, when a new batch of labels is printed, or when a new label design is created the new VOF logo must be used. VOF is working hard to ensure that consumers recognize our new logo and equate it with quality, certified organic, locally grown and produced products. We believe it will benefit your business to use the new version of the VOF logo! An electronic version of the VOF logo can be found here <http://bit.ly/VOFLogo>.

Q: Can I use the USDA logo on my label?

A: If your product is certified in either the '100% organic' or 'organic' categories then you may use the USDA logo if you choose. An electronic version of the USDA logo can be found here <http://bit.ly/USDAOrganicLogo>.

Please refer to the VOF Guidelines booklet or the NOP website (<http://www.ams.usda.gov/AMSV1.0/nop>) for specific information pertaining to the use of the USDA logo.

Q: Can I use both the USDA and VOF logo on my label?

A: If your product is certified in either the '100 % organic' or 'organic' categories then you may use the USDA logo and the VOF logo simultaneously if you choose. However, the VOF logo must not be displayed more prominently than the USDA logo on the product packaging. Please refer to the VOF Guidelines booklet for specific information pertaining to the use of the USDA logo.

Additional points to note:

- Producers who produce both certified and non-certified products and who consider their farm to be certified, may not use a statement such as "ABC farm is certified by VOF" on the non-certified product label.
- Revised guidance pertaining to labeling was issued by the NOP in January of 2013. This guidance clarified the placement of the 'certified by...' phrase. Therefore, labels that were previously approved by VOF may need to be modified to meet the above requirements to be considered compliant. Producers who have product labels which include the 'certified by...' phrase but where the phrase is located in the incorrect spot will have until January 1, 2016 to revise the label to be in compliance with the above guidance.
- All new labels must meet the requirements outlined in this document.

VOF Labeling Examples

Farm label: Equivalent to a return address label. A label that does not reference a specific product but only serves to identify the name and address of the farm.

Product label: A label that identifies a specific product or group of products in addition to identifying the farm or handler.

Handler information block: Part of a retail product label that consists of the following information, either on the same line or on consecutive lines, without intervening text:

Business name

Address (if not in a local directory)

City, State, Zip Code



Generic retail product packaging

+

Farm Label

+

VOF logo sticker

=

Compliant



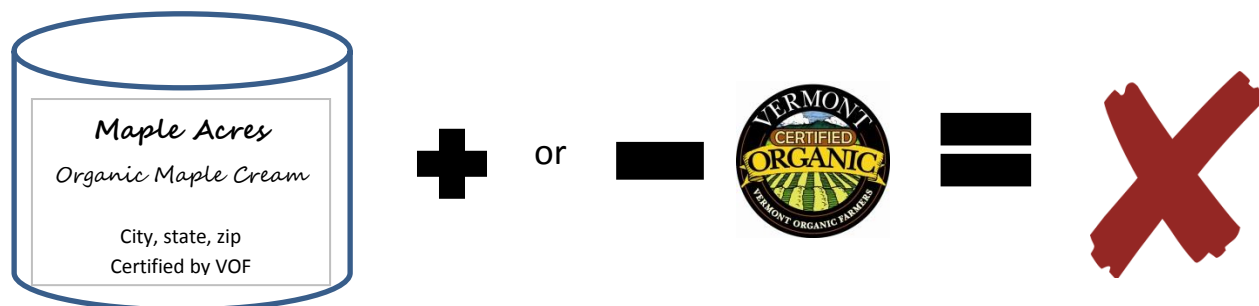
or



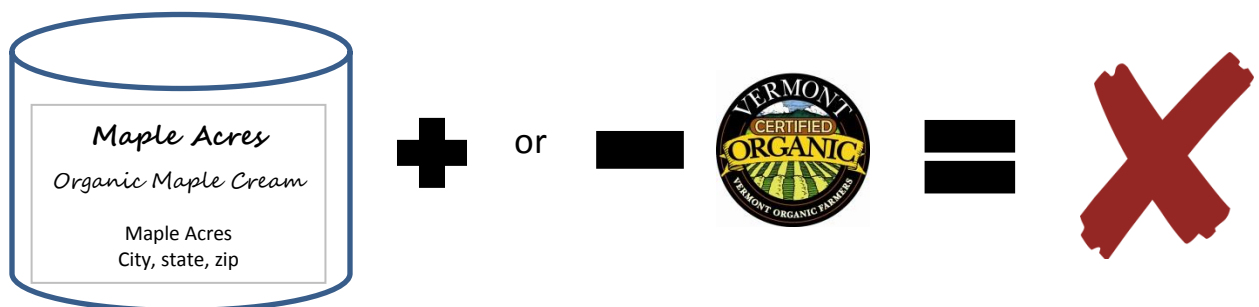
Custom product label making an organic claim on retail product packaging with complete handler information block and identification of certifying agency directly beneath handler information block. Compliant with or without VOF logo/sticker.



Custom product label **NOT** making an organic claim on retail product packaging with complete handler information block **WITH** VOF logo/sticker added. **The addition of the VOF logo/sticker is equivalent to making an organic claim and therefore the phrase identifying the certifier (missing here) is needed beneath the handler information block.**



Custom product label making an organic claim on retail product packaging **WITHOUT** complete handler information block with or without the VOF logo/sticker added. **The handler information block must consist of the business name, address (if not in a local directory) city, state and zip code without intervening text.** In this case, the handler information block is missing the business name.



Custom product label making an organic claim on retail product packaging with complete handler information block **with or without** VOF logo/sticker added. **The product label makes an organic claim and therefore the phrase identifying the certifier (missing here) is needed beneath the handler information block.**



Generic retail product packaging

+

Farm Label

+

VOF logo sticker

=

Compliant



Custom product label **NOT** making an organic claim on retail product packaging with complete handler information block **WITH** VOF logo/sticker added. ***The addition of the VOF logo/sticker is equivalent to making an organic claim and therefore the phrase identifying the certifier (missing here) is needed beneath the handler information block.***



or



Though not specifying a specific product, this is considered a custom product label that represents the contents as organic **with or without** VOF logo/sticker added. ***The product label makes an organic claim and therefore the phrase identifying the certifier (missing here) is needed beneath the handler information block. . The addition of the VOF logo/sticker is equivalent to making an organic claim and therefore the phrase identifying the certifier (missing here) is needed beneath the handler information block.***

