

MOA / VISPS Verified Program Standards

I. Introduction to the MOA/ VISPS Technical Administrator:

The Mid-America Organic Association (MOA) is a non-profit organization dedicated to educating the public about organic, ecologically produced, and non-organic foods and to providing resources for its members to connect farmers with buyers and to add value to their products. As such, MOA will serve as the Technical Administrator for the MOA/ VISPS Verified Program and will be providing oversight and implementation of the VISPS Verified Program standards.

MOA is undergoing accreditation to the ISO / IEC 17065 Standard: Conformity assessment-Requirement for bodies certifying products, processes and services. This process involves a rigorous examination of the MOA's quality systems and verification procedures, assessment of personnel qualifications, and observation of on-site inspection of verified clients. ISO/ IEC 17065 accreditation is intended to ensure that the review and verification process implemented by the verification body is conducted in a consistent and reliable manner.

As such, all clients that purchase products that are verified to the MOA / VISPS Verified Program are assured that those products are consistently held to the highest standards as defined within the MOA/ VISPS Standards.

II. Introduction to the MOA/ VISPS Verified Program

The MOA/ VISPS Verified Program was developed by a group of academia and agricultural businesses* who saw the demand by customers for Non-GMO foods, and for foods that exceed Non-GMO standards. They saw that those customers are vitally concerned about foods that are produced by GM technology, about the use of chemical fertilizers and pesticides, and about the resulting effects from those types of agricultural production methods on the health of the body and our environment. These customers are educated about the effects of the long-term use of the GMOs, and chemical fertilizers, pesticides and herbicides on the resulting decline of the beneficial pollinators, butterflies, birds and wildlife within our environment, and they will spend their monies on foods that do not use these farming principles. They are willing to pay additional costs for these foods; but they also want assurance that the foods they purchase are really the foods for which they are paying the additional monies.

The collaborative group of academia and agricultural businesses saw an opportunity to add value to their farmer products by verifying and branding that their products that are being produced without the use of GMOs and beyond that, without the use of the chemical pesticides, herbicides and chemical fertilizers; instead using natural resources that maintain the life of the soils while enhancing crop yields

The MOA/ VISPS Verified Program was developed to provide the verification and marketing advantage for the farmers. By utilizing the MOA/ VISPS Verified Program, the farmers are

verified as meeting or exceeding the VISPS Verified Program standards. All products that have been verified to the VISPS Verified Program are entitled to use an additional marketing logo, the “Smart Plants™ Quality Checked” label on their products.

** The list of Academia and Agribusinesses collaborating on the VISPS Verified Program are available in the MARDI corporate offices; and are additionally available at the Missouri Technology Foundation under the grant title, “A Value Chain Approach to Developing and Commercializing High-Yielding Non-GMO and Organic Soybeans.”*

The development of the VISPS Verified Program was funded by a grant from the Missouri Technology Foundation, under the auspices of Mid-America Regional Development Incubator (MARDI), a non-profit organization.

MOA/ VISPS has developed three categories of crops verification to which a product can be verified for compliance, with separate unique standards, labelling, and marketing for each level of verification:

- 1). **“Non-GMO” Standards (NGO)**
- 2). **“Close-To” Standards (CTO)**
- 3). **“Transitional-To-Organic” Standards (TTO)**

The MOA/ VISPS Verified Program has adopted the USDA National Organic Program definitions and standards as point of reference for crops produced by Genetically Modified or Engineered, Organisms production methods (hereby called GM crops), and as the standards under which VISPS will implement the NGO, Clos-2, and TTO Verified Program.

A. Purpose of the MOA/ VISPS Verified Program:

The VISPS Verification Program is designed as a “Value-Added Chain” approach for verification, Identification, and marketing of value-added “Non-GMO”, “Close-To” and “Transitional-to-Organic” products which have been deemed compliant to their respective standards.

B. Methodology:

The MOA/ VISPS Verification Program will provide compliance oversight that implements strategies to ensure the VISPS customers are receiving VISPS verified products that meets or exceeds the MOA/ VISPS Verified standards at each level of verification. There are five major methodology components of the VISPS Verified program:

- 1). Clients’ successful completion of the application process and VISPS System Plan (VSP).
- 2). Initial Review of the VSP to ensure the “ability to comply” with the standards.
- 3). All MOA/ VISPS clients must agree to an on-farm assessment for compliance to the VISPS standards, dependent on which level of VISPS verification that the client chooses.

Supporting documents review and Non-GMO lab testing for every shipping lot number will be used as the criteria to verify clients as compliant to the NGO Standards clients.

- 4). Clients who choose to be verified to the CTO Standards will be subjected to randomly selected on-farm assessments, with a minimum of 20% of all CTO Standards verified each year.
- 5). All TTO clients will be subjected to an annual on-farm assessment.
- 6). Verification oversight for accurate VISPS Labeling of the clients' products for each of the unique levels of the MOA/ VISPS Verified Program will be conducted to ensure that only VISPS Program verified products have the VISPS Logo affixed to the products.
- 7). Testing verification of each load of final grain products prior to shipping to ensure that the grain products meet or exceed the VISPS standards to minimize the risks for GMO's entering into the supply chain.
- 8). Random Non-GMO testing of the lower risk "Specialty Crops" will be a component of the VISPS Verified Program; *except that*; Specialty Crops that are known to be genetically modified will be subjected to more frequent sampling than the lower risk "Specialty Crops." Examples of the Specialty Crops that will be subjected to more frequent testing would be potatoes, beets, summer squashes, and other specialty crops that would be subjected to cross-pollination contamination from GM specialty crops.
- 9). Marketing support for the VISPS Verified Program "Smart Plants Quality Checked" labeled clients' products.

III. Scope of the MOA/ VISPS Program

- 1). The MOA/ VISPS Verified Program is limited by scope to:
 - a). On-Farm Production of VISPS Verified Crops Products;
 - b). On-Farm Processed Single Ingredient VISPS Verified Crops Products
 - c). Minimally Processed Plant Products
- 2). The scope of the VISPS Verified Program does NOT include Complex Processing of Multi-Ingredient products. Examples of Complex Processing Multi-Ingredient Products might incorporate ingredients derived from several levels of processing, and/or include the use of complex flavors, "natural ingredients," complex processing aids, enzymes, steaming with the use of steam boilers, etc.

A. VISPS Scope and Activities

Type of Activity	Details/ Comments	Covered under VISPS
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		Verified Program Scope
Agricultural Production of Crops	Includes farm production, harvest and on-farm storage of plant based crops on the farm.	Yes- VISPS System Plan (VSP) and Monitoring Forms supplied by VISPS Program.
Off-Farm Storage	Includes, but not limited to: Grain Bins, Bulk Bins, Gravity Wagons, Walk-In Coolers and Freezers which are maintained off the farm production area.	Yes- VISPS System Plan (VPS) and Monitoring Forms supplied by VISPS Program.
Farm- Owned Trucking	Includes, but not limited to: Farm-owned bulk tractors, trailers, cars, trucks, produce trucks.	Yes- VISPS System Plan (VPS) and Monitoring Forms supplied by VISPS Program.
Contract Hauling	Includes, but not limited to: Contract Truckers, Common Carriers (Fed-Ex, etc.), and Cooperative Food Distributors when the farmer retains ownership of the food products.	Yes- VISPS System Plan (VPS) and Monitoring Forms supplied by VISPS Program. NOTE: Additional documentation is required that verifies that integrity is not lost during shipping of the product.
Minimally Processed Agricultural Products	Includes harvesting and minimally processing methodologies, including but not limited to cleaning and sanitizing the equipment and minimally processing plant products.	Yes-VISPS Minimally Processed Products System Plan (MPP-VPS) and Monitoring Forms supplied by VISPS Program
Brokers of VISPS Verified Products	Includes all brokering processes. Brokers normally do not take possession of the products, but instead facilitates movement of the products from farms to final purchasers. Brokers must maintain a clear audit trail from time of purchase of the VISPS verified products to	Yes- VISPS Distributor System Plan (VDSP) and Monitoring Forms supplied by VISPS Program. NOTE: Additional documentation is required that verifies that VISPS integrity is not lost during distribution of the product, dependent on point of legal

	time of legal transfer of products.	transfer.
Distributors of VISPS Verified Products	Includes all distributing processes, including receiving VISPS products, storage of VISPS products, and shipping of the VISPS products. Distributors may or may NOT take possession of the products, but will not alter or process the products, either mechanically or chemically.	Yes- VISPS Distributor System Plan (VDSP) and Monitoring Forms supplied by VISPS Program. NOTE: Additional documentation is required that verifies that VISPS integrity is not lost during distribution of the product, dependent on point of legal transfer.
Packaging and Labeling of Products	Includes packaging and labeling of products owned and managed by the VISPS client.	Yes- VISPS System Plan (VPS) and Monitoring Forms supplied by VISPS Program. All packaging and labeling must be approved by the VISPS Administrator prior to selling, labeling, or otherwise portraying products as VISPS Verified.

IV. VISPS Terms and Definitions:

For the purpose of administering the VISPS Program, the following terms will be adopted:

Audit trail. Documentation records sufficient to determine the source, transfer of ownership, and transportation of any agricultural product labeled as VISPS compliant.

Biologics. All viruses, serums, toxins, and analogous products of natural or synthetic origin, such as diagnostics, antitoxins, vaccines, live microorganisms, killed microorganisms, and the antigenic or immunizing components of microorganisms intended for use in the diagnosis, treatment, or prevention of diseases of animals.

Buffer zone. An area located between the VISPS verified production operation or portion of a VISPS production operation and any adjacent area that is not maintained as VISPS compliant. A buffer zone must be sufficient in size or other features to prevent potential unintended overspray or other contact by prohibited substances that have been applied to adjacent land areas with the VISPS verified operation.

Clean-Out Procedures. Procedures that are written and implemented sufficient to protect the integrity of the VISPS verified products. Such procedures should be detailed enough to describe the specific methodology of cleaning the farming equipment, transport trucks or rail cars,

and/or processing facilities equipment that has direct contact with the VISPS verified products. Monitoring must be implemented and records maintained to verify that the cleaning procedures are satisfactory to maintain such integrity of the product; and when it has been determined that the original cleaning procedure was not sufficient to preserve VISPS integrity, a secondary back-up plan must be implemented such that the equipment has been cleaned sufficiently to preserve VISPS integrity.

Commingling. Physical contact between VISPS verified and non-VISPS verified agricultural products during production, processing, transportation, storage or handling of the VISPS verified products.

Contamination. Direct or in-direct physical contact of the VISPS verified product, packaging of the VISPS product, or transportation of the VISPS product with any prohibited substance.

Farm Produced Products - Farm Produced Plant Based Products are defined as plant-based products that are obtained directly from farm production. Farm Produced Products would include the whole commodity grains and seeds, whole fresh horticultural crops, nuts, and any other plant based production as defined under the Farm Bill.

Fertilizer. A single or blended substance containing one or more recognized plant nutrient(s) which is used primarily for its plant nutrient content and which is designed for use or claimed to have value in promoting plant growth.

Field. An area of land identified as a discrete unit within a production operation.

GMO or Genetically Engineered Crops. The VISPS Verified Program adopts the National Organic Program (NOP) definition for GM Crops as outlined in 7 CFR Part 205, Terms Defined, found under the heading Excluded Methods, as such: “A variety of methods used to genetically modify organisms or influence their growth and development by means that are not possible under natural conditions or processes and are not considered compatible with organic production. Such methods include cell fusion, microencapsulation and macro-encapsulation, and recombinant DNA technology (including gene deletion, gene doubling, introducing a foreign gene, and changing the positions of genes when achieved by recombinant DNA technology). Such methods do not include the use of traditional breeding, conjugation, fermentation, hybridization, in vitro fertilization, or tissue culture.”

Inputs. Any material, product, or substance that is used in the production or processing of the VISPS verified product to enhance some portion of the final VISPS verified product. Some inputs might include, but are not limited to: Fertilizers, Soil Amendments, Biologicals, Cleansing and/or Sanitizing Agents, Pests, Weeds, or Disease Control substances or any other substance that would be used in agricultural production. Other inputs would include unprocessed agricultural products such as whole seeds, vegetables, grains, herbs, and other fresh foods that would be used as a component of a final VISPS verified product.

Inspection. The act of examining and evaluating the application of a VISPS verified production or processing operation to determine compliance to the VISPS standards. Inspection might

include: review of paperwork, an audit of the audit trail documentation, on-site physical inspection of the VISPS verified operation, or any other act that the Administrator deems necessary to issue the VISPS verification certificate.

High Risk crops. Genetically modified crops that are grown on a large scale in North America and other parts of the world. Included in high risk assessments are livestock products because animal feed commonly contains high-risk inputs. In addition, vaccines are sometimes produced using genetically engineered processes and injections of recombinant bovine growth hormone are sometimes used to increase milk production.

Lot number. A unique identifying numbering system that provides the methodology to trace a VISPS verified product from time of the seed or plant being placed into the field, through production and storage of the product, through shipping and processing of the final product, and anywhere in the system to the time of legal transfer of ownership of the VISPS verified product.

Low Risk Crops. Crops which fall in the Specialty Crops definition and other plant-based crops for which genetically modified versions have not yet been commercialized, or for which there are no known or suspected instances of contamination.

Minimally Processed Agricultural Products- Minimally Processed Agricultural Products are defined as any further-processed products that has raw agricultural ingredients contained within the final product. The Minimally Processed Single Ingredient Products may be produced by either mechanical or physical methods of production or extraction. Examples of a raw agricultural ingredients that are minimally processed would include, but not limited to: Whole or Chopped Grains, Seeds, Hay, Chopped or Diced Single Ingredient Vegetables.

Minimally Processed Agricultural Products Processing Facilities. A Processing facility produces products that meets the Minimally Processed Agricultural Products definition.

Plant-Based Products. For the scope of the MOA/ VISPS Verified Program, plant--based products are defined as: Whole commodity grains and seeds, grass and legume based products, and products derived from those plant-based products. Also included are Specialty Crops, defined under Section 101 of the Specialty Crops Competitiveness Act of 2004 (7 U.S.C. 1621 note) and amended under section 10010 of the Agricultural Act of 2014, Public Law 113-79 (the Farm Bill) , as “fruits and vegetables, tree nuts, dried fruits, horticulture, and nursery crops (including floriculture).”

Prohibited substance. Any material, product, or substance that is not listed as allowed in the MOA/ VISPS Standards.

Parallel or Split Operation. An agricultural operation that produces both VISPS Verified and Non-VISPS Verified products on the same operation. A Parallel and Split Operation might also be producing VISPS, Non-VISPS, and Certified Organic products on the same operation.

Records. Any information in written, visual, or electronic form that documents the activities undertaken by a producer, processor, or the VISPS Administration to document compliance to the VISPS standard.

VISPS Logo. The unique VISPS seal comprised of a display of written, printed, or graphic material that portrays the approval by the VISPS Program for the agricultural product. The VISPS Logo is to be placed on the immediate container of an agricultural product, or affixed to a bulk container containing an agricultural product, or on accompanying rail or trucking BOLs that transport VISPS approved products. Such VISPS Logo is a trademarked seal which must be applied in its exact color, font, and graphics as supplied by the VISPS Administrator to the VISPS approved clients. The VISPS Logo cannot be affixed to any product that is not verified as approved by the VISPS Administrator.

VISPS System Plan (VSP). A plan of management of a VISPS verified production operation or processing facility that has been agreed to by the producer or processor and the VISPS Administrator to include written plans concerning all aspects of agricultural production or processing facility described in the VISPS standards.

VISPS Verified Operation: A production system that is managed and has been verified to be in compliance with the VISPS standards. An approved VISPS Verified Operation will receive an annually updated VISPS certificate indicating that the operation has met all the requirements of, and is in good standing with, the VISPS standards.

V. Tolerance Levels of GMOs in MOA / VISPS Verification Program

The MOA/ VISPS Verification Program has adopted the following tolerance levels for the presence of GMO materials in final products, as established by the Non-GMO Project:

Category	Action Threshold
Seed and other propagation materials	0.25%
Human Food-Grade crops intended to be used for human foods.	0.9%
Feed-Grade CTO standard for crops intended for livestock feeds	2.5%
Feed-Grade NGO intended to be used for Livestock Feeds	3.5%

VI. VISPS STANDARDS

All VISPS Standards must meet the following requirements. Individual level standards have their own specific standards which are addressed following this section.

A. Seeds

- 1). No GMO seeds may be used for any of the VISPS Verified programs.
- 2). Individual seed requirements are listed separately under each VISPS Verified Programs.

3). Non-GMO seeds (or other seed requirements) must be verified by copies of the seed tags, and/or a statement must be supplied from the seed supplier stating that the seeds have been produced using no GMO methods (or other seed requirements).

4). Invoices must be submitted that corroborates that the seeds as portrayed by the seed tags have been purchased in sufficient amounts to be able to plant total acres in the fields.

B). Buffers

1). Buffer zone areas must be maintained on the farm sufficient to prevent unintended contamination of VISPS verified fields from unintended applications of GMO pollen drift or applications of chemicals used for desiccant premature drying of the grain crops. Such buffers could include natural buffers, such as tree lines, hedges, roadways, rivers, creeks, etc. are in place to prevent unintended drift onto the VISPS verified crops.

2). When natural buffers are not sufficient to prevent contamination, additional buffers must be established by the producer. Such buffers might include leaving established grass strips that are not harvested, or from commercial cash crops that have been harvested separately from VISPS verified products and sold as non-VISPS verified product. Sufficient monitoring records must be maintained to document sale of buffer-area crops as non-VISPS crops.

C). Farm or Facility Maps and Flow Charts

1). Farm maps must be submitted to show the specific details of the fields to be verified, including field numbers (identified by township and range), acres in the fields, current crops in the fields, surrounding crops in the fields, and any necessary buffer zone areas.

2). Farm maps should be obtained from your local NRCS or ASC office, or some other official mapping service that officially documents the acres and township and range of the fields.

3). Farm maps may either be attached to your VISPS on-line application; or alternatively mailed to the VISPS office at 417 Main Street, Suite B, Boonville, MO 65233; or may be scanned and emailed to maps@vispsverified.com.

D.) Clean-Out Procedures

1). Clean-out procedures must be developed, implemented, and documented for all direct contact equipment that is used for both VISPS verified products and non-VISPS Verified products. The clean-out procedures must be sufficient to prevent contamination from prohibited substances and commingling of VISPS Verified products with Non-VISPS verified products.

2). All equipment used in a farming operation that is used for both VISPS Verified products and Non-VISPS Verified products must be cleaned including, but not limited to: planters, tractors, cultivators, combines, gravity wagons, auger systems, grain bins, trucks, and other

equipment that is used by the operation for both VISPS Verified and Non-VISPS Verified products.

3). All equipment used in transporting both VISPS Verified and Non-VISPS Verified products must be cleaned, including but not limited to: auger systems, hopper bottoms trucks, gravity wagons, rail cars, or any other equipment and transport systems that are used in the transport of both VISPS Verified and Non-VISPS Verified products.

4). All procedures must be presented to the VISPS Administrator with the VISPS System Plan (VSP) for prior approval before implementing the procedures.

5). Adequate monitoring records must be maintained to verify that the cleaning procedures have been implemented and are sufficient to prevent contamination and commingling of VISPS Verified products.

6). When monitoring the equipment, the equipment is shown to not be cleaned, another cleaning procedure must be implemented and documented on the monitoring records. The outcome of the second cleaning procedure must be documented on the monitoring records.

E). Traceability

All VISPS Verified products must have the ability to be traced through the full process from seeds planted in the fields to legal transfer of final products.

1). Such traceability must be implemented through use of a unique lot numbering system used throughout the process that shows the product from time of planting in the fields through production and shipping of final product. The lot number will consist of the farm initials, field number, crop, and year of production; i.e. SB1S16- Sue Baird Farm, Field 1, Soybeans, 2016.

2). If more than one field with individual field lot numbers are commingled into grain bins or other storage containers prior to shipping or use, a separate identifier lot number must be created for the bin or other storage container that can be linked to the individual field lot numbers through shipping and final legal transfer of VISPS products; thus closing any gaps in the traceability chain; i.e., SBB1S16- Sue Baird Farms, Bin 1, Soybeans, 2016. If using the grain bin lot number to provide traceability of the crops, a separate Harvest Record must be maintained that shows that Fields 1 and Field 2 were harvested and stored in Bin 1.

F. Inspections

VISPS Verified clients must agree to allow an on-site inspection of their operation by a VISPS trained inspector, scheduled with a designated representative during normal business hours. The inspection must be scheduled while crops are still in the fields.

- 1). VISPS- NGO Verified clients: There will be no on-site inspections of operations that are only NGO Verified; excepting in the case of a call is received about a quality issue or concern that the VISPS-NGO Verified operation has used GMO seeds, seed treatments, or any other prohibited substance and farming methodology on the operation.
- 2). VISPS- CTO Verified clients: All VISPS-CTO Verified operations are subjected to a randomly selected on-site inspection by the VISPS trained inspector. At a minimum, 20% of all CTO operations will be inspected on an annual basis. An additional inspection will be scheduled if a call is received in the VISPS office about a quality issue or concern.
- 3). All VISPS-TTO Verified operations will be subjected to an annual on-site inspection by a VISPS trained inspector to be scheduled with the operator during normal business hours. An additional inspection will be scheduled if a call is received in the VISPS office about a quality issue or concern.

G). Testing of Samples

Genetics based testing is required before products will be MOA / VISPS verified.

- 1). The frequency and location of Real Time or Digital PCR testing can be tailored to accommodate the Participant's supply chain.
- 2). All MOA/ VISPS verified operations must adhere to the following procedures for testing of their crops or livestock products.
- 3). Genetic testing samples must be sent to:
Midwest Laboratories
13611 "B" Street
Omaha, NE 68144

No other laboratory testing results will be accepted by the VISPS Administrator as valid for the VISPS Verified Program.

- 4). The test results must be sent to the MOA / VISPS Administrator to be retained in the client files.

1). Testing of crops shipped directly from the fields.

- a). Each load shipped directly from the fields must be tested for the presence or absence of GMOs prior to shipping of the load. Test results must demonstrate that the crops fall at or below the established tolerance rate for the applicable crop usage. Testing protocol must follow the below methodology:
- b). Sanitize the grain probe and take a minimum of 6 probes in a zig-zag pattern from the top of the grain transport. Combine the six individual probe samples into one composite sample in a sanitized bucket; or,

- c). Alternatively, grain must be allowed to flow from the grain truck or gravity wagon hopper bottom for a minimum of 6 catches while the grain is flowing. The catches are combined into one composite sample in a clean sanitized bucket.
- d). The composited sample should be divided into 3 samples. One of the three samples should be sent to the VISPS Administrator to be retained for a minimum of 1 year from time of sampling; one of the three samples should be retained by the VISPS Verified operator; and the third sample should be sent to the following laboratory for GMO testing using the method of GMO testing.
- e). No testing will be mandated for low-risk crops. MOA/ VISPS verification of low-risk crops will be confined to audit of seed tags and monitoring records to ensure that no GMO seeds at or above tolerance level have been planted, and that all efforts have been made to mitigate the potential for genetic drift to contaminate the low risk crops.
- f). High Risk Specialty Crops, including sugar beets, apples, zucchini and summer squash, must be tested by lot code identifiers of the crops. Seed tags will be audited for Non-GMO declarations and buffers will be audited for potential of GMO drift. When a high-risk specialty crop is selected for GMO testing, the VISPS Verified client will be contacted for further instructions for the sampling technique.
- g). All Test sample results should be sent to the VISPS Administrator to be retained in the VISPS Verified Client files.

2). Testing of Commingled Stored Crops

- a). Each load of plant-based crops that will be shipped from a commingled storage grain bin or other storage container must be tested for the presence or absence of GMOs at or below the tolerance level for the crops final usage prior to shipping of the load.
- b). Open the grain bin trap and allow the grain to flow freely into a clean sanitized bucket for a minimum of 6 catches and composited into one sample.
- c). High Risk Specialty Crops, including sugar beets, apples, zucchini and summer squash, must be tested to document the absence of GMOS at or below tolerance levels for the crops intended usage. Seed tags will be audited for Non-GMO declarations and buffers will be audited for potential of GMO drift. When a high-risk specialty crop is selected for GMO testing, the VISPS Verified client will be contacted for further instructions for the sampling technique.
- d). Follow the directions for test sampling for crops shipped directly from the fields from this point forward.

4). Testing for VISPS Minimally Processed Agricultural Products and Processing Facilities

- a). The MOA/ VISPS Verified Processing Facility must maintain documentation for testing of every ingredient load received into the facility for further processing into MOA / VISPS

Verified final products. The testing must document the absence of presence of Non-GMO contamination at or below the tolerance level established for the intended usage of the product.

b). A statistically valid sampling and testing plan for the MOA/ VISPS Verified final products shall be designed based on risk assessment of the processing system. The sampling shall reflect the level of monitoring appropriate for the risks inherent in the processing facility system, excepting that a minimum of 20% of all final products must be tested.

c). Results of the tests shall be documented and maintained in the processing facility corporate office.

d). Analysts must be trained and their performance evaluated to assure they use the tests reliably. Results of the in-house evaluation of performance of the analyst must be maintained in personnel files subject to MOA/ VISPS on-site inspections.

H). Complaints or Calls of Concern

1). If there is a Complaint or Call of Concern about a MOA/ VISPS verified operation, including using GMO seeds, prohibited seed treatments, or any other VISPS verified prohibited substance and farming methodology on the MOA/ VISPS Verified operation, an investigation will be scheduled with the operation at their earliest convenience. A VISPS inspection may consist of:

a). On-farm or facility audit of books will be conducted, including, but not limited to: A review of seed and inputs tags, seed and inputs invoices, clean equipment records, harvest records, and shipping/sales records.

b). In the case of VISPS CTO or TTO verified operation, the investigation could escalate to:

i). Visually inspecting the crop fields for evidence of glyphosate or other prohibited substances use in the fields

II). Randomly sampling of the crops in the fields; or if already harvested, stored grains may be sampled.

III). Any other items as deemed necessary by the trained inspector to verify compliance with VISPS CTO standard

VII). VISPS Non-GMO Standards (NGO)

The VISPS NGO verification is a document review and lab testing program only.

1). All VISPS-NGO clients must obtain a composite sampling of their grain to be sent to the VISPS selected lab for verification of the Non-GMO status prior to shipping their grains.

2). Those VISPS verified clients who choose to become verified to the VISPS NGO standards must adhere to the individual standards as outlined below:

A). Seeds

- 1). Only Non-GMO seeds may be used to produce VISPS NGO final products.
- 2). All other seed treatments are allowed in VISPS NGO final products.

B). Allowed Substances and Crop Production Methodologies under the VISPS NGO Standards

- 1). All soil fertility amendments, pest and weed substances are allowed under the VISPS NGO Standards, unless specifically prohibited.
- 2). All crop cultural practices are allowed under the VISPS NGO Standards unless specifically prohibited.

D). Prohibited Substances under the NGO Standards

- 1). GM seeds as defined under the USDA-NOP standards are prohibited from being planted.
- 2). GMO derived hay and/or all other feedstuffs, feed additives, or feed supplements are prohibited from being fed to VISPS NGO Verified Livestock.

VIII). VISPS “Close-To” Standards (CTO)

Those VISPS verified clients who choose to become verified to the CTO standards must adhere to their individual standards as outlined below:

A. Seeds

- 1). Only Non-GMO seeds may be used to produce VISPS CTO final products.
- 2). Non-GMO seeds and approved seed treatments must be verified by copies of the seed tags, and/or a statement must be supplied from the seed supplier stating that the seeds and/or seed treatments have been produced using no GMO methods.
- 3). Invoices must be submitted that corroborates that the seeds as portrayed by the seed tags have been purchased in sufficient amounts to be able to plant total acres in the fields.

C). Allowed Substances and Production Methodologies under the VISPS CTO Standards

- 1). All OMRI materials and products listed for organic crops and livestock production are allowed for use in the MOA/ VISPS CTO standard. www.omri.org.
- 2). All WSDA materials and products listed as allowed for organic crop and livestock production are allowed for use in the MOA/ VISPS CTO standard. http://agr.wa.gov/Fp/Pubs/docs/BNML_By_Product_Name.pdf
- 3). All CDFA materials and products listed as allowed for use in organic crop and livestock production are allowed for use in the CTO standard. https://www.cdfa.ca.gov/is/ffldrs/fertilizer_OIM.html
- 4). All EPA material and products listed as allowed for use in organic production are allowed for use in the MOA/ VISPS CTO standard. <https://www.epa.gov/pesticide-registration/epas-national-organic-program-guidance>

5). All OOEFA certification clients may also use the OEFFA materials and products listed as allowed for use in organic production in the MOA/ VISPS CTO standard.

<http://www.oeffa.org/oeffa.php>

6). All seeds listed in the USDA-NOP [§205.204 Seeds and planting stock practice standard](#) are allowed under the MOA/ VISPS CTO standard.

7). All soil fertility amendments listed in the USDA-NOP [§205203 Soil fertility and crop nutrient management practice standard](#) are allowed under the MOA/ VISPS CTO standard.

8). All soil fertility, pest, weeds, or disease substances listed in the USDA-NOP National List [§205.601 Synthetic substances allowed for use in organic crop production](#) are allowed in the MOA/ VISPS CTO standard.

9). All materials listed as approved by the NOP for soil fertility, pest, weeds, and diseases found in [§205.206 Crop pest, weed, and disease management practice standard](#) are approved for use in the MOA/ VISPS CTO standard.

11). All soil fertility, pests, weeds, and disease input materials that have been determined to be compliant by the VISPS Material Review Board and that are listed on the VISPS website as approved materials are allowed for use in the MOA/ VISPS CTO standard.
<https://vispsverified.com/approved-products.php>.

D). Prohibited Substances under the CTO Standards

- 1). GM seeds as defined under the USDA-NOP standards are prohibited from being planted for CTO Verified Crops.
- 2). Seed treatments that have been produced using GMO methods are prohibited from planted used on the seeds to be planted for CTO Verified crops.
- 3). Soil fertility, pests, weeds and disease treatment substances may not be used for the CTO Standards, crops; excepting as listed in the most current VISPS CTO Allowed Substances and Production Methodologies listing. Any other substances that the client might want to use must be prior approved by the VISPS Administrator.

IX). VISPS “Transitional-To- Organics” Standards (TTO)

Those VISPS verified clients who choose to become verified to the TTO standards must totally adhere to the standards outlined in the National Organic Program regulations, as detailed in the 7 CFR 205. A complete updated copy of the NOP standards may be found at: <https://www.ams.usda.gov/about-ams/programs-offices/national-organic-program>.

A). Land Requirements

- 1). Land may be certified organic 36 months from the last date of application of prohibited substances.

2). Farms may be verified as split or parallel operations, with some fields completing the TTO period prior to other fields which are located on the same farm.

3). Land to be verified as VISPS TTO Verified must obtain a Prior Land Use Affidavit or other documents that verifies the last date of applications with prohibited substances. This date will be used to start the transitional period.

4). Crop rotations must be established, sufficient to: “(a) Maintain or improve soil organic matter content; (b) Provide for pest management in annual and perennial crops; (c) Manage deficient or excess plant nutrients; and (d) Provide erosion control. Cover crops may include, but are not limited to Sod, Green Manure Crops, Catch Crops, Cash Cover Crops “

B). Seeds

1). Only Non-GMO, non-chemically treated seeds may be used to produce VISPS TTO final products.

2). No synthetic chemical plant disease, fungicides, or pesticide seed treatments may be used to produce VISPS TTO final products.

3). Non-synthetic seed treatments may be used on seeds to produce VISPS TTO final products such as, but not limited to: natural microbial and/or biological products and bulking agents; i.e., bentonite clay added to add size to the seed for precision planting. Seed treatments must be verified by the VISPS Administrator as being produced without GMO methods prior to being applied to the seeds.

4). Non-GMO, and non-treated seeds must be verified by copies of the seed tags, and/or a statement must be supplied from the seed supplier stating that the seeds and/or seed treatments have been produced using no GMO methods.

3). Invoices must be submitted that corroborates that the seeds as portrayed by the seed tags have been purchased in sufficient amounts to be able to plant total acres in the fields.

C). Allowed Substances and Production Methodologies under the VISPS TTO Standards

1). All OMRI materials and products listed for organic production are allowed for use in the TTO standard. www.omri.org.

2). All WSDA materials and products listed as allowed for organic production are allowed for use in the TTO standard. http://agr.wa.gov/Fp/Pubs/docs/BNML_By_Product_Name.pdf

3). All CDFA materials and products listed as allowed for use in organic production are allowed for use in the TTO standard. https://www.cdca.ca.gov/is/ffldrs/fertilizer_OIM.html

4). All EPA material and products listed as allowed for use in organic production are allowed for use in the TTO standard. <https://www.epa.gov/pesticide-registration/epas-national-organic-program-guidance>

5). All OOEFA certification clients may also use the OEFFA materials and products listed as allowed for use in organic production are allowed for use in the TTO standard. <http://www.oeffa.org/oeffa.php>

6). All seeds listed in the USDA-NOP [§205.204 Seeds and planting stock practice standard](#) are allowed under the VISPS TTO standard.

7). All soil fertility amendments listed in the USDA-NOP [§205.203 Soil fertility and crop nutrient management practice standard](#) are allowed under the VISPS TTO standard.

8). All materials listed as approved by the NOP for soil fertility, pest, weeds, and diseases found in [§205.206 Crop pest, weed, and disease management practice standard](#) are allowed under the VISPS TTO standard.

9). All pest, weeds, or disease substances listed in the USDA-NOP National List [§205.601 Synthetic substances allowed for use in organic crop production](#) are allowed in the TTO standard.

D). Prohibited Substances under the TTO Standards

1). All substances that are prohibited in the NOP standards, [§205.602 Nonsynthetic substances prohibited for use in organic crop production](#) are prohibited for use in the VISPS TTO Verification Program.

2). Any synthetic substances not listed in the NOP Standards [§205.601 Synthetic substances allowed for use in organic crop production](#) are prohibited for use in the VISPS TTO Verification Program.

X). Use of VISPS Logo

Any project, whatever its medium which displays the VISPS logo, and/or makes reference to VISPS or compliance to its standards, must be submitted to MOA VISPS Program for approval before the logo or reference thereof may be used.

A). Graphics

1). The VISPS seal is protected by MOA VISPS Program in the following form:



2). Neither the shape nor the typography of the logo may be changed. The Logo is available in electronic digital form to VISPS verified clients upon request.

B). Component

The components of the logo are fixed and may not be modified.

C). Color

1). On a white, ivory or other light colored background, the logo must be displayed in:

CMYK: C=40 M=0 Y=99 K=0; RGB: R = 166, G = 205, B = 70

2). Exception- On a background that clashes with lime green: the logo may be applied in black or white. Logo must be in one color only.

D). Shape and Size of Logo

1). The logo must be of adequate size to be reasonably legible. The proportions of the logo must be maintained.

E). General Rules of Use of the MOA / VISPS Logo:

The MOA VISPS logo and/or reference to MOA VISPS or to its verification program may be displayed on any type of media (packaging, labeling, website, brochure, advertising, etc.).

1). The following general rules must be respected whatever the type of media, for all uses of the MOA/ VISPS logo and/or reference to MOA / VISPS or to its verification:

2). The MOA/ VISPS logo and/or reference to MOA VISPS or to its certification may only be displayed in association with products, organizations or activities that have been verified by MOA VISPS. This can be done only if:

(i) Covered by a valid document establishing that the product, organization or activity (certificates, attestations) is compliant with the requirements of the MOA VISPS farming standards,

(ii) It is within the scope(s) identified on the current certificate.

3). In no case may the MOA / VISPS logo, reference to MOA / VISPS or to its certification be associated with products, organizations or activities that have not been certified by MOA / VISPS, nor shall they be displayed in a manner likely to result in a false or misleading representation of the status of the product.

F). Specific Rules for Use on Packaging and Labelling of VISPS Verified Products

1). All types of packaging or labeling of certified products displaying the VISPS logos and/or reference to MOA / VISPS or to its verification must respect the specific rules defined in the VISPS standards and specified in the associated "labeling guide".

2). The operator is responsible for the issuance and for the use of labels, for the check of their validation, and for the control of their use, subject to the respect for VISPS Logo.

G). Specific Rules for Use for the Purposes of Communication

The following specific rules must be respected for all media used for the purposes of

communication displaying the VISPS logo and/or reference to MOA / VISPS or to its verification:

- 1). When the VISPS logo and/or reference to VISPS or to its verification are displayed without specific reference to a certified product, or in reference to a group of products, only some of which are verified, clear identification of the corresponding certified products must be added to clearly inform the consumer.
- 2). The user may not use the VISPS logo and/or reference to MOA/ VISPS or to its verification in any way that might cause harm to MOA / VISPS's reputation, and must not make any statement likely to result in an error.