



**Organically Grown Cannabis Certification Program  
(OGCCP) – PRODUCER SCOPE**

# INTRODUCTION

## Overview of the Organically Grown Cannabis Certification Program – Producer Scope

The Cannabis Certification Council (CCC)<sup>1</sup> has developed standards and certification criteria to establish an Organically Grown Cannabis Certification Program (OGCCP) for cannabis producers seeking to gain recognition in the marketplace for growing cannabis in accordance with organic production practices.

CCC designed the OGCCP to facilitate transparency for consumers in how cannabis is produced and to support producers with a meaningful differentiation label. The OGCCP provides a consistent mechanism for organic certification agencies to document operations' adherence to organic regulations in cannabis production. The program builds upon consumer trust and awareness of the organic marketing claim used by food, feed, and fiber producers, and it adopts the USDA organic regulations where practicable.

## Overview of OGCCP Criteria

The OGCCP Criteria are the requirements for organic certification agencies offering certification to those operations seeking OGCCCP certification of cannabis.

The OGCCP Criteria are available at [www.cannabiscertificationcouncil.org](http://www.cannabiscertificationcouncil.org)

## Overview of OGCCP Standards

The OGCCP Standards are the requirements for operations seeking OGCCP certification for cannabis operations.

The OGCCP Standards include the specific requirements necessary for OGCCP certification, and the standards delineate three separate labeling categories for cannabis based on type of production ("Indoor Grown," "Greenhouse Grown," and "Outdoor Grown"). The standards were developed to be congruent with the requirements of USDA National Organic Program 7 CFR Part 205, and they are not intended to supersede State cannabis licensing and regulatory requirements.

The NCTP Standards are available at [www.cannabiscertificationcouncil.org](http://www.cannabiscertificationcouncil.org)

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<sup>1</sup> The CCC is a nonprofit standard holding body focused on providing consumer and industry education, transparency and choice in the cannabis industry. Through our [#Whatsinmyweed](#) campaign and the [Cannabis Sustainability Symposium](#) the Council has become a leading advocate for clean, ethical and sustainable business practices in the cannabis industry.

# OGCCP CRITERIA

The OGCCP Criteria are designed specifically for Accredited Certifying Agencies (ACAs) seeking accreditation with the CCC for operating OGCCP certification in accordance with the OGCCP Standards.

The criteria are specific requirements necessary for an organic certification agency to operate a OGCCP program congruent with the USDA NOP 7 CFR, including rules for:

- Eligibility,
- Changes to OGCCP Criteria and Standards,
- OGCCP Certification Services

## 1.0 ELIGIBILITY FOR CCC ACCREDITATION

An ACA is eligible for CCC Accreditation to grant OGCCP certification, if the agency is already an ACA, in good standing, under the USDA NOP regulations.

*The Accredited Certification Agency(s) must:*

1.1 Have accreditation as demonstrated with a certificate from the USDA NOP per 7 CFR Part 205 for the accreditation scope of Crops.

1.2 Provide OGCCP training to certification personnel and inspectors, as necessary.

1.3 Provide CCC with a list, at a minimum quarterly, of each operation granted OGCCP certification, including:

- The operation's name, address, and telephone number,
- The varieties of cannabis produced,
- The type of production system(s) employed ("Indoor Grown," "Greenhouse Grown," and/or "Outdoor Grown") for each variety of cannabis produced.

## 2.0 REVISIONS TO OGCCP CRITERIA & STANDARDS

The OGCCP criteria and standards are congruent with the USDA 7 CFR Part 205, therefore, any revisions to the USDA 7 CFR Part 205 may require an update to the OGCCP Standards. Other revisions may also come from stakeholder feedback. The CCC Technical Advisory Committee meets as needed and no less than every 2 years to evaluate requests for changes. CCC notifies accredited ACAs of any revisions to the OGCCP criteria and standards.

*2.1 Revisions of the Criteria. When revisions to the OGCCP Criteria are released, the ACAs must:*

2.1.1 If applicable to accredited scope(s), the ACA notifies its OGCCP operations of revisions to the OGCCP criteria within 30 days of notification from CCC.

2.1.2 An ACA has 12 months or as otherwise defined by CCC to be in full compliance to the revisions.

2.1.3 Make necessary revisions to its certification services to demonstrate full compliance during the applicable period.

2.1.4 Provide training on the revised OGCCP criteria to its certification personnel and inspectors within 3 months of notification from CCC.

*2.2 Revisions of the Standards. When revisions to the OGCCP Standards are released, the ACAs must:*

2.2.1 Notify its OGCCP operations of revisions to the OGCCP standards within 30 days of notification from USDA.

2.2.2 Operations have 12 months to be in full compliance to the revisions unless a shorter period is defined by CCC.

2.2.3 Make necessary revisions to its certification services to demonstrate full compliance during the applicable period.

2.2.4 Provide training on the revisions of the OGCCP Standards to its certification personnel and inspectors within 3 months of notification from CCC.

## **3.0 OGCCP CERTIFICATION SERVICES**

### **3.1 Application for OGCCP Certification**

The application for OGCCP certification is provided by the operation to the ACA to request services; including but not limited to: OGCCP Standards, application form, Organic System Plan forms, certification agreements, cost estimates and fee schedules.

*For the OGCCP program, the ACA must operate in accordance to USDA 7 CFR §205.400 & §205.401, specifically:*

3.1.1 Ensure that all operators have access to the OGCCP Standards.

3.1.2 Provide any OGCCP fee(s) in the Fee Schedule and Cost Estimate(s).

3.1.3 Provide access to applications for annual renewal of OGCCP certification. Existing forms and Organic Systems Plans approved by USDA NOP are deemed sufficient but at minimum, must additionally include:

3.1.3.1 A description of the type of production employed by the operation for the purposes of classification into “Indoor Grown,” “Greenhouse Grown,” or “Outdoor Grown” labeling.

### **3.2 Application for Initial or Continuation of Certification**

A review of each application for initial or continuation of (annual) OGCCP Certification consists of evaluating the application in accordance to OGCCP standards.

*For the OGCCP program, the ACA must operate in accordance to USDA 7 CFR §205.402; and specifically:*

3.2.1 Ensure the operation is eligible for OGCCP certification for applicable scopes; Crops, and, more specifically, classify the operation, or portion(s) of the operation, as an Indoor Operation, Greenhouse Operation, and/or Outdoor Operation.

3.2.2 Verify if the applicant has ever been notified of a denial of OGCCP certification.

3.2.3 If an applicant appears to have the ability to comply with the OGCCP standards, an inspector is assigned per Section 3.3 below.

3.2.4 If an applicant does not comply with OGCCP Standards, an ACA issues a Notice of Denial of OGCCP Certification per 3.5 below.

### **3.3 Inspection**

The Inspection is an onsite visit by an Inspector assigned by the ACA to evaluate the operation's compliance to the OGCCP standards.

For the OGCCP program, the ACA must operate in accordance to USDA 7 CFR §205.403, specifically:

3.3.1 Require an initial and/or annual inspection.

3.3.2 Evaluate the operation for compliance to the OGCCP Standards.

3.3.3 ACAs may perform unannounced inspections

3.3.4 ACAs must perform residue testing, annually, of every operation in the OGCCP program.

### **3.4 Granting Initial OGCCP Certification**

The organic certification agency grants OGCCP certification to applicants who comply with OGCCP Standards.

*For the OGCCP, the accredited certification agency must operate in accordance to USDA 7 CFR §205.404, specifically:*

3.4.1 Determine if the applicant has the ability to comply with the OGCCP Standards.

3.4.2 If compliant, grant an OGCCP Certificate to the operation that includes:

3.6.3.1 Reference to the OGCCP Standards.

3.6.3.2 Date of Certification (the date which the operator is certified to the OGCCP standards).

3.6.3.3 Date that the OGCCP Certificate expires (1 year following Date of Certification)

3.6.3.4 Identification of all applicable varieties, field(s), and location(s) covered by the certification

3.6.3.5 Identification of classification of applicable varieties as "Indoor Grown," "Greenhouse Grown," and/or "Outdoor Grown."

3.4.3 A Granting of OGCCP certificate may also be accompanied by a condition of certification per Section 3.7 Compliance.

### **3.5 Denial of OGCCP Certification**

An application is denied when the ACA determines that the operator does not comply with the OGCCP Standards.

*For the OGCCP, the ACA must operate in accordance to USDA 7 CFR §205.405, except that it must:*

3.5.1 Issue Notification of Denial of OGCCP Certification.

3.5.2 The Notification of Denial of OGCCP certification includes, at minimum, the operator's rights to: Reapply for OGCCP

### **3.6 Continuation of OGCCP Certification**

*For the OGCCP, the ACA must operate in accordance to USDA 7 CFR §205.406, specifically:*

3.6.1 Determine if the operator complies with the OGCCP Standards based on updates to the Organic System Plan.

3.6.2 If compliant, issue a Notification of Granting Continuation of OGCCP certification. This Notification may include conditions of certification per 3.7.

3.6.3 If compliant, issue a OGCCP Certificate to the operation that includes:

3.6.3.1 Reference to the OGCCP Standards.

3.6.3.2 Date of Certification (the date which the operator is certified to the OGCCP standards).

3.6.3.3 Date that the OGCCP Certificate expires (1 year following Date of Certification)

3.6.3.4 Identification of all applicable varieties, field(s), and location(s) covered by the certification

3.6.3.5 Identification of classification of applicable varieties as "Indoor Grown," "Greenhouse Grown," and/or "Outdoor Grown."

### **3.7 Compliance**

An operation may be issued a Condition of Certification or other notification as defined by the ACAs program manual.

A Condition of Certification is a reminder to operators about items that do not require immediate action, but could escalate to a denial per 3.5 or other compliance actions if not resolved prior to the next annual continuation of certification. The Condition of Certification may be issued with the Notification of Granting of OGCCP certification or with the Notification of Granting Continuation of OGCCP certification issued during the annual review of updates to the Organic System Plan.

The ACA may also issue Notice of Noncompliance(s); per 7 CFR Part §205.662.a-b Notice of Noncompliance(s). *If the agency uses these compliance actions, the following must apply:*

3.7.1 Compliance Notices (Denials and Noncompliance(s)); including combination and resolution notices thereof are not copied to the USDA NOP Administrator.

3.7.2 Appeal proceedings are performed in accordance with 3.8 below.

### **3.8 Appeal OGCCP Certification**

An appeal is an operation's dispute of a certification decision made by the ACA. An appeal is made directly to the ACA. The appeal is the responsibility of the ACA.

ACAs may opt for mediation processes as described in the USDA NOP Regulations to resolve issues prior to an appeal proceeding.

*For the OGCCP, the ACA must operate in accordance to the OGCCP Certification Requirements as follows:*

3.8.1 Provide a process to receive, evaluate and make decisions on appeals. The ACA must record and track appeals, as well as actions undertaken to resolve them.

3.8.2 Upon receipt of an appeal, the ACA must confirm whether the appeal relates to certification activities for which it is responsible and, if so, must address it and acknowledge receipt of a formal appeal.

3.8.3 Investigate all necessary information (as far as possible) to progress the appeal to a decision.

3.8.4 The decision resolving the appeal must be made by, or reviewed and approved by, person(s) not involved in the certification decisions related to the appeal. This may include a separate mechanism, such as an individual, governance body, ad hoc committee or other reasonable mechanisms to make decisions of the appeal.

3.8.5 To ensure that there is no conflict of interest, personnel (including those acting in a managerial capacity) who have provided consultancy (see 3.2) for a client, or been employed by a client, must not be used by the ACA to review or approve the resolution of an appeal for that operation within two years following the end of the consultancy or employment.

3.8.6 Give formal notice of the outcome and the end of the appeal process to the appellant.

3.8.7 Take any subsequent action needed to resolve the appeal.

# OGCCP STANDARDS

## S.1 General Policy

All cannabis producer operations seeking to utilize the labeling claim and seal for the OGCCP and seeking oversight of this process by obtaining certification from an ACA must be certified per the OGCCP standards. In general, all operations certified under OGCCP must:

S1.1 Produce cannabis in accordance with applicable local licensing requirements.

S1.2 Apply to an ACA and maintain annually thereafter an Organic System Plan to be evaluated for compliance with the OGCCP.

S1.3 Comply with 7 CFR 205 Subpart C – Organic Production and OGCCP standards.

## S.2 OGCCP PRODUCTION STANDARDS

Cannabis producers eligible for the OGCCP certification are legal producers of cannabis

**S2.1 *Soil fertility and crop nutrient management practice standard.*** A producer who grows cannabis in containers is exempt from the crop rotation and cover cropping requirements in sections 7 CFR 205.203(b) and 7 CFR 205.205. In lieu of crop rotation and cover cropping, the following soil regeneration and recycling practices shall be implemented and documented for the ACA, as applicable to the operation. Specifically:

S2.1.1 Maintain or improve soil organic matter content. Examples include, but are not limited to, recycling and re-use of growing media, addition of compost and other compostable materials, earthworm replenishment, and microbial re-inoculation.

S2.1.2 Provide for pest management in cannabis. Examples include, but are not limited to, soil borne disease control through various low temperature heating methods, soil inoculation using disease suppressant bacteria and fungi, and cultivation of trap crops or companion crops for insect pest prevention.

S2.1.3 Manage deficient or excess plant nutrients. Examples include, but are not limited to, recycling excess plant nutrients contained in drain water from media containers, avoiding “drain-to-waste” systems. Recycled nutrients should be re-used in the operation if possible, or, alternatively, used on a growing crop outside the operation.

S2.1.4 Provide erosion control. Examples include, but are not limited to, recycling of drain water which prevents off-site movement of nutrients and recycling of growing media.

S2.1.5 Recycling of growing media. Growing media shall be comprised of ingredients that allow for recycling and re-use as growing media within the operation, or, alternatively, as a crop input outside the operation. Growing media shall not be disposed of as waste, but should be recycled or reused whenever possible. Growing media shall contain sufficient organic matter capable of supporting natural and diverse soil ecology.

S2.2 **Labeling.** The producer must label Organically Grown Cannabis in accordance with the following standards.

S2.2.1 Use of the term, “Organically Grown Cannabis.” The term “Organically Grown Cannabis,” and associated seal, must, and may only, be used on labels of cannabis that have been produced in accordance with OGCCP standards.

S2.2.2 Packaged cannabis labeled “Indoor Grown.” The term “Indoor Grown,” and associated seal, must be used on labels of cannabis produced in an indoor operation.

S2.2.3 Packaged cannabis labeled “Greenhouse Grown.” The term “Greenhouse Grown,” and associated seal, must be used on labels of cannabis produced in a greenhouse operation.

S2.2.4 Packaged cannabis labeled “Outdoor Grown.” The term “Outdoor Grown,” and associated seal, must be used on labels of cannabis produced in an outdoor operation.

S2.3 **Exclusion from labeling as Organically Grown Cannabis.**

S2.3.1 When residue testing detects unavoidable residual environmental contamination or prohibited substances at levels greater than 0.01 parts per million (ppm) or greater than the FDA Action Level, the cannabis products shall not be sold, labeled or represented as Organically Grown Cannabis. The ACA shall investigate the OGCCP operation to determine the cause of the prohibited substance.

# DEFINITIONS

**Cannabis:** All parts of the plant *Cannabis*, whether growing or not, with a THC concentration greater than 0.3 percent on a dry weight basis; the seeds thereof; the resin extracted from any part of the plant; and every compound, manufacture, salt, derivative, mixture, or preparation of the plant, its seeds or resin.

**OGCCP:** Organically Grown Cannabis Certification Program

**OGCCP Operation:** A cannabis producer whose operation and or portion of an operation has been granted certification to the OGCCP standards.

**Producer:** A person licensed by their appropriate state agency to produce and market cannabis.

**Indoor Operation:** An operation that produces cannabis in a fully enclosed facility relying exclusively on artificial lighting for the growth and flowering of cannabis.

**Greenhouse Operation:** An operation that produces cannabis in a fully or partially enclosed facility that relies primarily on natural sunlight for the flowering of cannabis. Greenhouse operations may also employ light deprivation techniques and/or artificial lighting in addition to natural sunlight.

**Outdoor Operation:** An operation that produces cannabis relying exclusively on natural sunlight for the growth and flowering of cannabis. Outdoor operations may employ the use of coverings that transmit light, such as high tunnels, but are prohibited from utilizing artificial light or light deprivation during the flowering of cannabis.

**National Organic Standards:** Standards required for organic certification. Also referred to as the USDA 7 CFR Part 205, the Act or the National Organic Standards (NOS), NOP Regulations.

**Accredited Certification Agency (ACA):** An organization accredited by the USDA National Organic Program under 7 CFR Part 205 and accredited by CCC for operating in accordance with the Organically Grown Cannabis Certification Program.

**CCC:** Cannabis Certification Council, the developer of the Organically Grown Cannabis Standards for operators and Organically Grown Cannabis Certification Requirements for Accredited Certification Agencies.