



# THE ORGANIC CULTIVATOR

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## PINE KNOB FARM

### 100 Ewes and Climbing

by Joe Pedretti, Outreach Manager

Bonnie Wideman has been raising sheep for 40 years, the last 25 on her 160 acre farm in Southwest Wisconsin near Soldiers Grove. Many farmers would have settled into a familiar groove, but Bonnie is a continuous experimenter- you have to be when you raise sheep organically. "The biggest problem with sheep is parasites. The sheep industry has become depen-

dent upon synthetic wormers. People stopped using natural selection to raise naturally resistant sheep," noted Bonnie.

She accomplishes natural parasite control through a combination of techniques. First, by purposefully understocking her farm, she can allow a full three month

*see PINE KNOB on page 4*



## FROM THE DIRECTOR

This is a beautiful time of year, isn't it? Nice long days, planting, growing, greening, blooming... it makes for a busy and productive time! May 1 was the due date for MOSA clients to submit their updated organic system plans and assorted paperwork; if you haven't done so yet, please get in touch with us immediately so you don't incur any additional late fees and your certification continues without a hitch. Thinking ahead to your annual inspection, some things to remember:



**Cori Skolaski**  
Executive Director

- If you add new land to your certificate, it needs to be inspected prior to grazing or sales.
- New facilities, production lines, unique production equipment, or herds must be inspected before they can be added to your certification.
- All organic retail labels must be approved by MOSA before use.
- All inputs must be reviewed and approved before use.
- Your current organic certificate does not expire unless you surrender or we suspend or revoke it; your current organic

*see DIRECTOR on page 3*

# CERTIFICATION POLICY UPDATE

by Jackie DeMinter, Certification Policy Manager

**Proposed Rule on Organic Livestock and Poultry Practices Published! Comments are due June 13, 2016.** The National Organic Program (NOP) of the Agricultural Marketing Service (AMS) has just released the proposed rule on Organic Livestock and Poultry Practices (LPP). The proposed rule would clarify existing USDA organic regulations related to livestock and poultry production requirements, thereby ensuring consistency among organic producers and certifiers while protecting the integrity of the USDA organic seal. The NOP has added new definitions, amended the livestock healthcare practice standards, amended the livestock living conditions to cover mammals only, and added two new sections - one on poultry living conditions and another on transport and slaughter. There are no changes to the other organic livestock provisions - origin of livestock, livestock feed, or the pasture practice standards. AMS is still working on a final rule for the origin of livestock through a separate action.

We've compiled a summary of the proposed actions, but because the changes are many, we've not covered them all here. This summary captures the most significant changes. You can access the Federal Register notice of the proposed rule here: <https://www.gpo.gov/fdsys/pkg/FR-2016-04-13/pdf/2016-08023.pdf>

Producers with livestock have been sent additional information and a client survey regarding the proposed changes. Please remember that the survey is due by May 12. The NOP also put together a question and answer sheet to further explain their proposals: <https://www.ams.usda.gov/sites/default/files/media/NOP%20Livestock%20Poultry%20Practices%20Proposed%20Rule%20QAs.pdf>

Specifically, this proposed action would:

- Add fifteen new terms to § 205.2: beak trimming, caponization, cattle wattling, de-beaking, de-snooding, dubbing, indoors, mulesing, outdoors, perch, pullet, roost, soil, stocking density and toe clipping.
- Clarify how producers and handlers must treat livestock and poultry to ensure their health and well-being. The proposed livestock health care practice standards include requirements for euthanasia to reduce suffering of any sick or disabled livestock. Rations must sustain appropriate body condition. The NOP will be providing additional guidance on body condition requirements.
- Clarify when and how certain physical alterations may be performed on organic livestock and poultry in order to minimize stress. Some physical alterations (needle teeth trimming in pigs) may not be used routinely. Additionally, some forms of physical alterations would be prohibited.
- Require ammonia level testing in poultry houses monthly. Houses must be less than 25 ppm, and for tests over 10 ppm, producers must implement practices to reduce ammonia levels.
- Set separate standards for mammalian and avian livestock living conditions to better reflect the needs and behaviors of the

different species, as well as related consumer expectations. The proposed mammalian livestock standards would cover both ruminants and swine.

- Set maximum indoor and outdoor stocking density for avian species, which would vary depending on the type of production and stage of life. Poultry must be trained to go outside and have sufficient exits.
- Indoor space must be sufficiently spacious to allow birds to move about normally. For hens and mature birds, artificial light must be lowered gradually and natural light must be sufficient. All birds must have access to scratch areas indoors. Pullets may be confined to 16 weeks and nest box training is limited to two weeks.
- Define outdoor access to exclude the use of structures with solid roofing for outdoor access (no porches) and require livestock and poultry to have contact with soil. All animals shall have access to the soil and at least 50% of the outdoor access must be soil. Outdoor access for poultry must have adequate enrichment to encourage birds to go outdoors.
- Add new requirements for transporting livestock and poultry to sale or slaughter. Bedding must be provided in trailers and if the bedding is a roughage, organic, except for poultry crates. Sick, injured, weak, disabled, blind, and lame animals must not be transported for sale or slaughter. Such animals may be medically treated or euthanized.
- Clarify the application of USDA Food Safety and Inspection Service (FSIS) requirements regarding the handling of livestock and poultry in connection with slaughter to certified organic livestock and poultry establishments and provide for the enforcement of USDA organic regulations based on FSIS inspection findings.
- Have a phased in implementation period. The NOP proposes that all producers would need to be in compliance with all proposed requirements within one year, except for outdoor space requirements for birds. For those there would be no compliance requirement for three years. Beginning three years after the rule is published, any new operations applying for certification would need to be compliant in order to be certified. Any operations certified during or before those three years would have a total of five years from the date of publishing in which to come into compliance.

## Does this Action Apply to You?

You may be potentially affected by this action if you are engaged in the meat, egg, poultry, dairy, or animal fiber industries. Potentially affected entities may include, but are not limited to:

- Individuals or business entities that are considering organic certification for a new or existing livestock farm or slaughter facility.
- Existing livestock farms and slaughter facilities that are currently certified organic under the USDA organic regulations.
- Certifying agents accredited by USDA to certify organic livestock operations and organic livestock handling operations.

see *POLICY UPDATES* next page

This listing is not intended to be exhaustive, but identifies key entities likely to be affected by this action. Other types of entities could also be affected. If you are not sure if or how this action would affect you, please contact our office to discuss your Organic System Plan.

#### What Should You Consider as You Prepare Your Comments?

Your comments should clearly indicate whether or not they support the proposed action for any or all of the items in this proposed rule. You should clearly indicate the reason(s) for the stated position. Your comments should also offer any recommended language changes that would be appropriate for your position. Please include relevant information and data to further support your position (e.g. scientific, environmental, industry impact information, etc.).

Please send your comments directly to the NOP. We strongly encourage you to submit comments, especially the information requested by the NOP. Follow the following instructions for submitting comments.

**Federal eRulemaking Portal:** <http://www.regulations.gov>. Search: AMS-NOP-15-0012

**Mail:** Paul Lewis Ph.D., Director Standards Division, National Organic Program, USDA-AMS-NOP, Room 2646-So., Ag Stop 0268, 1400 Independence Ave., SW, Washington, DC 20250-0268.

**Instructions:** All submissions received must include the docket number AMS-NOP-15-0012; NOP-15-06PR, and/or Regulatory Information Number (RIN) 0581-AD44 for this rulemaking.

**Dates:** Comments must be received by **June 13, 2016**.

For MOSA's comments, we are gathering information in survey format from our clients certified for livestock production. If you have livestock, you should have now received a separate envelope from us containing a survey and if you haven't yet, please take the time to complete our survey.

Please contact our office with any questions regarding this new proposed rule. ■

certificate is valid until we issue a new one. As long as we don't tell you otherwise, you are good to go.

- At any time, you can log into [mymosa.org](http://mymosa.org) to review your organic system plans and paperwork, see your inspection report, view or pay certification or inspection fees, and view and print your organic certificate.
- If you call MOSA, it is very helpful for you to have your account number handy; it is on the update paperwork we sent you in February, and it is printed on your organic certificate.

\* \* \*

In February at our annual Board of Directors meeting we said a fond farewell with our deepest appreciation to Laura Paine and Rachel Armstrong for their service on the board. Adrian Plapp was appointed President, Kat Becker was appointed Vice President, Denise Thornton was appointed Secretary, and Judith Reith-Rozelle was appointed Treasurer. We welcomed Sue Baird as the newest board member; Sue works as an independent organic inspector, reviewer, and consultant and serves as the executive director of the Missouri Organic Association. Thanks to all of MOSA's board members for their guidance and support!

Some exciting news at MOSA is that we purchased our office building! We've been here for several years and it has changed hands a few times; this time when it went on the market it felt right for us to buy it. We've all seen and heard how quickly the organic sector is expanding, and MOSA has been experiencing this with a pretty large increase in the number of new operations that are signing on with us. In order for us to continue providing quality customer service we've been consistently adding staff; just in the last three years our staff size has grown from 23 to 30. Because of this, we felt it was important to secure the building in which we're housed; Viroqua is a fantastic community in which to be located, but it is not rich in commercial buildings. If we lost our lease we'd be hard-pressed to find a new home that met our needs, and our location in the heart of downtown is ideal. If you're ever in our neighborhood, drop by and say hello!

\* \* \*

This newsletter is chock full of information we hope you find interesting and helpful. As always, if you have any questions or comments about anything in this newsletter – or about MOSA – please feel free to contact me at [cori@mosaorganic.org](mailto:cori@mosaorganic.org) or 608-637-2526. Thank you for reading, and thanks for your continued commitment to organic integrity. ■

 <p>P.O. Box 821 • 122 W. Jefferson • Viroqua, WI 54601</p>	<p><a href="http://mosaorganic.org">mosaorganic.org</a> 608-637-2526</p>
<p>At MOSA, we treat you like you're the most important part of our work – because you are.</p>	<p><b>Practical, Reliable and Friendly Certification Services</b></p>



rotation between pastures. "Most farms have a 30 day rotation, which is not good for parasite control. There is not enough time for the parasites to hatch and die between grazings". Secondly, she chooses to raise a high percentage of hair sheep, which are much more resistant to parasites. "My biggest task is finding parasite treatments and management techniques for wool sheep. I am a culler. I use the "Famacha System" for identifying sheep with parasites- barber pole worms are the worst one. With the Famacha System, you look at the sheep's inner eye membranes for anemia. This way you only treat the animals that need it. This also leaves a refugia of worms that don't become resistant to being killed by a paraciticide. It also allows me to identify and cull sheep that are more prone to problems."

Bonnie uses a combination of treatments. For those animals that show anemia, she treats them with copper oxide wire particles. She tracks effectiveness by sending out fecal samples for testing. All animals get drenched with "Garlic Barrier". "Garlic doesn't kill the worms, but makes the gut more resistant to attachment." Bonnie also uses diatomaceous earth (DE) in their free choice mineral. "It is unfortunate that more research isn't being done on DE. Mostly what we have is anecdotal evidence. My mineral is one third kelp, one third Redmond salt, and one third DE."

Bonnie only feeds a little grain to ram lambs that didn't put on enough weight late in the season to be marketed before winter. Otherwise, the only feed is pasture and hay from the farm. "A real turning point was when I stopped feeding grain to pregnant ewes. If you feed them grain, the lamb gets too big and you get lambing problems, plus the ewes tend towards metabolic imbalance and pregnancy diseases."

Bonnie has also found that lambing a little later, and on pasture gives much better results. "For decades we lambed in the barn- in March. That is truly an unhealthy environment. We had a lot of lung issues. The mother can't go off on their own to lamb and form bonds. That is natural behavior. Now the sheep are never in the barn except for special events like shearing and sorting."

This also applies to her overwintering program. All of the sheep are kept out on pasture and fed dry hay. "We feed in different locations throughout the winter so we can spread the fertility in the pastures. You shouldn't only feed in one location," said Bonnie.

To keep lambing to a tight April window, Bonnie sorts all of the sheep into five groups (breed and age) and intro-

duces rams. "The sorting isn't so bad, but keeping them in place is tricky," noted Bonnie. "Lambing is now timed for when pasture and milk production are peaking."

The flocks' lambing percentage is around 180% for mature ewes and she sells around 100 meat lambs per year, primarily Katahdin and Dorpers, with Clun Forest and Polypay ewes recently added to the flock. Ideally she wants to butcher lambs at 100 lbs. "My current fascination is with the Cluns- a breed that hasn't been tampered with much."

If you raise sheep, you will have to manage orphan lambs. Inexperienced ewes, or ewes with triplets will sometimes abandon their lambs. "Raising lambs by hand was always very sad, because of the high death loss. This year I read about a New Zealand procedure of making yogurt out of high quality milk replacer. I make my own and my death losses have been greatly reduced," remarked Bonnie (Note: Lambs fed milk replacer cannot be sold as organic). "I have four gallons going at all times. I mix and replace as I use it. You go through a lot feeding as many as 20 orphans three times per day. I have less than 10% death loss now."

Pasture is the foundation of Bonnie's management. "With a three month rotation, I give up a little quality in forage, but get much better parasite prevention. Pasture management with sheep always has to be a compromise."

Bonnie does reseed pastures with clover and will also let pastures go to seed from time to time. "Mob grazing can sequester

more carbon, but it is much harder to mob graze with sheep due to their size. Cattle will trample everything, but sheep will not. I try to treat fields a little differently each year. I like that I get more leafy forbs in my pastures. They can select what they need and they are good for the sheep."

At weaning, ram lambs are put on the best pasture, often the ones that have been recently reseeded. Ewe lambs stay longer with their dams on the rougher pastures. "If money wasn't an issue, I would reseed all of my pastures to native prairie," said Bonnie.

Bonnie has taken advantage of a number of NRCS conservation programs over the

years. She has gotten Environmental Quality Incentive Program (EQIP) cost share money to help with waterway and road improvements, and also with fencing and water lines. "I encourage everyone to look into the EQIP and the Conservation Steward-



cont. PINE KNOB from previous page

ship Programs. That money has allowed me to make improvements that I never would have been able to do otherwise."



Most of Bonnie's lambs are sold direct to individuals and restaurants. She also sells retail cuts at the Viroqua Farmers Market, along with sheepskins and wool rugs that she weaves herself. Unfortunately, the two local meat processors that were certified organic have gone out of business, so Bonnie uses an uncertified local locker instead. This means she cannot label her meat as certified organic despite raising them all organically. "I really miss Black Earth Meats. I just don't care to transport animals two or three hours to another processor. I know most of my customers, so selling direct without the organic label works, but I would rather have an organic option locally."

To learn more about Bonnie's system of managing organic sheep, you can order her 90 minute workshop recording from the 2016 MOSES Organic Farming Conference: <https://mosesorganic.net/product/rotationally-grazing-sheep/>

You can also visit her farm website for more information: <https://pineknoborganicfarm.com/> ■



## MEET MOSA STAFF MEMBER: GABRIELLE DANIELS



**What do you do in your position at MOSA?** I am the Administrative Manager, so I oversee the support and administrative operations of MOSA. I help assure effective information flow

between clients and staff and between departments. As someone with a connection to all departments at MOSA, I am always striving to help us provide excellent customer service, using the most efficient, best possible tools and processes.

**What do you do with your time outside of MOSA?** I am a homebody and love spending time with my husband and our two boys, 15 and 11. Our boys are very active in sports, music, theater, and more, and so much of my time outside of work goes to those activities. I also enjoy writing and creative projects; and I enjoy hiking, biking, camping, and canoeing.

**How long have you been at MOSA? Can you tell us one thing that was really different when you started?** I started at MOSA in January of 2008 as a temporary office worker. MOSA is very different now, but the biggest change is simply the growth of our organization and the organic industry as a whole. In 2008, there were about 15 staff and fewer than 1000 clients; now we have almost 30 staff and we're closing in on 2000 clients! It's been exciting and very heartening to see the evolution of this organization and the popularity and strength of the organic movement.

**Why organic?** I've been a passionate believer in organic since the late '90s, when my husband and I had a small CSA garden in Door County, WI. It has always struck me as a very common sense, logical, effective method of food production. Many of the arguments made by J.I. Rodale and other pioneers of the organic movement are now being proven by science. When I got the chance to be part of MOSA back in 2008, I jumped at the chance to continue my involvement in the organic movement. For me, my work at MOSA is a perfect coming together of my interests and passions.

**Why MOSA?** When I started to work at MOSA, I didn't know much about it other than its basic mission and some of the people connected with it - both staff and clients. I've felt excited and privileged to be part of MOSA and grateful to all the people here, past and present, who have taught me so much. I am dedicated to helping it be the best agency it can be for our clients and the best employer it can be for our staff.

**What are a few great things about your life?** Family has to be top on my list. My husband and I and our two sons lead a busy, fun, active life. We enjoy time together. My husband is an artist who works with disabled and disadvantaged adults. My boys are active, creative, generous kids. My extended family comes together for celebrations and in the care of my elderly father, who is in the later stages of Alzheimers. On a personal level, I cherish time outdoors and with close friends. My life, with its share of sorrows and struggles, is good. MOSA is a big part of what makes it good. ■



# BRINGING OUR GIFTS TO THE TABLE – SPRING NOSB DISCUSSIONS

by Stephen Walker, Operations Manager

At the time of this writing, several of us on the MOSA staff are in the last throes of preparing written comments on a number of diverse issues to be discussed at the April 25-27 National Organic Standards Board (NOSB) meeting, in Washington, DC. Meeting details, including all original proposals and discussion documents, can be found here: <https://www.ams.usda.gov/event/nosb-spring-2016-meeting-washington-dc>. Eventually, that link will have full meeting transcripts.

We're again doing our best to throw a few gallons of opinion into the ocean of comments navigated by NOSB members. MOSA staff prepared numerous written and verbal comments (detailed comments are on our website), and we sent four staff - Cori Skolaski, Jackie DeMinter, Felician Puig, and myself - to DC to offer in-person testimony and to meet minds with colleagues and good friends. NOSB meetings bring our organic community together to weigh in on what we want our National Organic Program to look like. I've always touted these meetings as a good opportunity for folks to influence our standards. Now, I see participation in the process as our responsibility as informed stakeholders. As we - MOSA and you - weigh in with our good thinking, we provide a service to the NOSB and so also to the wider organic community.

Below is an overview of agenda items and MOSA's views on some of these issues:

**GMO's/Excluded Methods terminology** - Two highly technical documents address the urgent need for an organic standards update to catch up with ongoing rapid developments in biotechnology, which have raised regulatory conundrums and outpaced regulatory structure. We think the proposal and discussion helps to define and strengthen the "organic IS non-GMO" message. We gave some feedback on potential enforcement challenges. We also touched on humility, and morality. Although we employ many dedicated, smart people who know a lot about organic farming and food processing, standards enforcement, materials review, and life, we're not typically employing experts in modern biotechnology. There is a moral imperative for the companies and individuals who possess specialized knowledge about excluded methods to be responsible and transparent, so the rest of us can make informed choices.

**Seed purity next steps** - This discussion document asked for more feedback on how best to enforce and maintain non-GMO purity for seed used in organic systems. It discusses required testing of non-organic seed, putting the burden on GMO users, and gathering data to provide insight on best practices and thresholds to improve purity of organic seed. The current standards and NOP direction leave some uncertainties related to determining compliance when there is GMO contamination. We support testing as way of determining thresholds to inform enforcement. We aim to enable seed purity improvements without being overly burdensome to organic producers. We also expressed concerns with inadvertent contamination of organic seed, which creates consumer confidence challenges and spreads contamination. It's a challenging and important issue.

**Annotation changes for Lidocaine, procaine, and parasiticides used in livestock** - These proposals gave background on how the current withholding periods after use of these materials were established, and provided background on the need for these materials in the organic livestock manager's toolbox. Previous public comments suggested that organic milk and meat withhold times and other restrictions were excessive, and inconsistent with normal use practices. The lidocaine/procaine recommendation from the Livestock Subcommittee was to reduce the withhold times from 90 days to eight days for meat products, and from seven days to six days for dairy. These are still double the times used by the Food Animal Residue Avoidance Databank.

For parasiticides, the recommendation was to allow use in fiber bearing animals with a 90 day withhold, to reduce the dairy withhold for fenbendazole and moxidectin from 90 days to 2 days for cattle (36 for goats and others), to take away the veterinarian oversight requirement for fenbendazole, and to take away the "internal parasites only" requirement for moxidectin. In our work at MOSA, we have seen parasite issues force organic operators to have to weigh a sound and considered veterinary recommendation against maintaining the long withhold period required by the current organic standard. A 90-day withhold, including loss of the organic milk price, can be a huge financial impact on an organic operator. We commented in support of these annotation changes.

**Sunset timeline reorganization** - Currently, materials on the National List of Allowed and Prohibited Substances are re-reviewed every 5 years, a "sunset" schedule coinciding with when they were added to the List. Since the original List was adopted in 2002 when the organic regulations became effective, most of those original items still require re-review in years ending in "2" or "7." Currently, 187 materials are due for review on the "2/7" cycle, while the other four cycles only have about 30 materials, combined. The NOSB sought comment on best methods to reorganize this schedule, to bump forward many reviews from the 2/7 cycle in an impartial and efficient (ex: grouping like materials together) manner. We support this reorganizational effort. We noted it seems like a relatively small procedural change that will bring important improvements, not the least of which is less strain on multiple stakeholders - NOP, NOSB, consumers, and certifiers. It's a good way to simply help take care of each other.

**Ancillary substances proposal** - This Handling Subcommittee document establishes a proposed definition of "ancillary substance", essentially meaning the "other ingredients" that routinely come along with things that are already on the National List (e.g. carriers), and includes compliance criteria, NOSB review procedure, and a list of the kind of info that should be on a compliance form/template used by certifiers. We appreciate the ongoing consideration of ancillary substances in National List materials. We find that most of the concerns we noted in our previous comments on this subject have been addressed in this new proposal. We still have

*see NOSB next page*

concerns regarding the practicality of requiring more compliance verification. However, we recognize that this new part of the NOSB materials review process, which now will also need consideration as we review materials on a daily basis, represents due diligence and will provide needed clarification regarding any substances that might be of concern.

**Nutrient vitamins and minerals** - This Handling Subcommittee discussion document sought feedback on how to change the annotation for the listing at National Organic Standards section 205.605 for nutrient vitamins and minerals, which cross-references to FDA section 104.20. That FDA reference is not what the NOSB intended when nutrient vitamins and minerals were approved in 1995, and the annotation opened loopholes. This document proposed a couple of options for discussion. MOSA suggested a hybridized version where vitamins and similar isolated ingredients would be allowed only when their use is required by law, or to meet an FDA standard of identity. We also would support an allowance for vitamins identified as essential in 21 CFR (FDA) section 101.9, and - for infant formula - vitamins and minerals as required by 21 CFR sections 107.100 or 107.10. Suffice it to say, sometimes we have to get down in the weeds.

**2018 sunset materials - handling, and crops** - The NOSB greatly appreciates organic community feedback regarding which materials up for sunset review are being used by organic operations. For crops, five materials are up for sunset review: *Copper sulfate*, *Ozone gas*, *Peracetic acid*, *EPA List 3 -Inerts of unknown toxicity*, and *Calcium chloride*. Ten handling materials are also up for re-review: *Agar-agar*, *Animal enzymes*, *Calcium sulfate-mined*, *Carrageenan*, *Glucono delta-lactone*, *Tartaric acid*, *Cellulose*, *Potassium hydroxide*, *Silicon dioxide*, and *Beta-carotene extract color*. A page or two of usage, manufacturing, international, and discussion information was provided for each material. We offered feedback on use of these materials as gleaned from our certification review work and internal materials database.

**Prohibition of nonyl phenol ethoxylates (NPE's) as inert ingredients in pesticides** - This discussion document warned that NPE's are not going to remain as allowed inert ingredients, so gave notice that it's time for pesticide manufacturers to start reformulating their products to meet organic requirements. The NOSB wanted feedback on how best to reach this stakeholder group, and asked certifiers for information on products we see which have NPE's as inerts. In our internal materials review database, which has nearly 6000 listings, we find a lot of products with NPE's that have been approved for use, to this point. Our comments note that we do not support the direction of this discussion. We feel it's not necessary, provided that a proposal made last Fall is acted upon. That proposal was for the annotation change of EPA list 4 inerts on National List sections 205.601(m) and 205.603(e). Materials called out in that previous discussion are not found on the lists that now proposed to replace EPA list 4.

The NOSB agenda also included discussion on the following items. We did not provide comments on these, but we're listening:

- A petition to add hypochlorous acid to the National List, as another approved chlorine material for use in livestock, handling and crops. This comes from Electrolyzed Water.
  - Many technical and clarifying changes to the NOSB Policy and Procedures Manual. Some changes emphasize NOP-NOSB collaboration.
  - A petition to add sodium lactate and calcium lactate to the National List as antimicrobial agents (e.g. in meat) and pH regulators. This addition would correct a 2004 NOP pronouncement that these were already on the NL, because their source materials were on the list. This interpretation was later changed, so these materials had to be separately petitioned for allowance.
  - A petition to add squid and squid byproducts to section 205.601 as a fertilizer.
  - A petition to add soy wax to section 205.601 as a production aid, to seal plugs in mushroom production logs.
  - NOSB subcommittees also rejected petitions for the following items to be added to the National List. These were deemed to not satisfy criteria for essentiality, impact on the environment, or compatibility and consistency with the Organic Foods Production Act: nonorganic oat beta glucan; sodium dodecylbenzene sulfonate as an antimicrobial in fruits and vegetables treated on the premises of a retail food establishment; ash from manure burning if no synthetics are added and combustion is controlled to preserve nutrients.
- So, there's an overview of recent discussion items. You can see how we've had our minds on a lot of things, all aimed at promoting organic integrity. As we consider these issues and bring our ideas to the table, we try to maintain our practicality, reliability and friendliness. We might say, well, "we're from the government, and we're here to help." That phrase sometimes garners a wink or an eyeroll, but indeed, we do take our thinking to heart.

You can contact MOSA for details on any of the above, including what was decided at the meeting. ■



# THE NUTS AND BOLTS OF ORGANIC INPUT APPROVAL

by Michael Crotser, Certification Specialist

One of the most common questions that we are asked is if a product is allowed for use in organic production. Properly answering these product review questions is critical for our office to document compliance and allows you to use organic production inputs. Product review questions fall under three use categories: crop production inputs, livestock management materials, and inputs used in handler operations. We appreciate the proactive calls related to product use, but remember that MOSA approval is required prior to use, and it takes time to gather all of the necessary information. One challenge in approving products is the gathering of the information needed to verify the product is allowed for its specific use. This article will focus on what type of information is needed for product review, how our office, manufacturers and you are involved, and what classes of products are routinely reviewed in our office.

How does the organic industry determine if a input is allowed by the National Organic Standards? Published within the standards are several lists that determine the allowed and prohibited materials for organic production. 205.601, 205.603 and 205.605 note the allowed synthetic materials that can be used in crop production, livestock management and processed products, respectively. Although synthetic materials are generally prohibited, some synthetics are allowed because the material cannot be produced from a natural source or there are no organic substitutes. Commonly used allowed synthetics include micronutrients for crop fertility, vaccines for livestock, and non-GMO dairy cultures for processed cheese.

Lists 205.602 and 205.604 identify prohibited nonsynthetic (natural) substances for crop production and livestock management, respectively. The "natural" substances on these lists pose an unnecessary risk to the environment, animals or consumers. Because of this, the substances cannot be used for organic production. Tobacco dust for crop pest management and strychnine for livestock production are examples.

Finally, 205.606 lists allowed non-organic ingredients to be used in processed organic products. These ingredients are allowed when organic sources are not commercially available. Examples include sausages made with intestinal casings or blueberry juice for food pigmentation.

The USDA recognizes four overarching organizations as having the authority to review inputs for organic production. The most commonly recognized is the Organic Materials Review Institute (OMRI). If you see an OMRI seal (Figure 1) on a product or that product is currently listed on the OMRI website, then that product is approved for organic use in the category they list it in. If you use a OMRI product, be sure that you are meeting their restrictions or annotations. For example, all kelp is not the same. There may be kelp products that are OMRI listed as a crop input, but cannot be used for livestock feed. The main difference for kelp use in livestock is that kelp as feed must be certified organic. Kelp as a crop input does not have to be certified organic, but all other in-

gredients within the kelp product must be allowed. Also, annotations may not be clearly described on the label for an OMRI listed product. An example would include micronutrients as a crop input. Micronutrients are allowed, but only after a producer has documented deficiencies.

Use approval can also be determined for products reviewed by the Washington State Department of Agriculture (WSDA), California Department of Food and Agriculture (CDFA) and the Environmental Protection Agency (EPA). However, EPA organic approval is only found for federally reviewed pesticides. If you use products approved by these regulatory agencies, be sure you are following the label instructions and that you are aware of any applicable restrictions or annotations. If you have any doubt, contact MOSA for clarity.

However, many products intended for organic use have not been reviewed by the authorized agencies noted above. In these cases, you must seek MOSA approval prior to using the product. Our products database contains thousands of entries and there is a good chance that we have already reviewed the product. Call or write our office to see if this is the case. When you contact us, be sure to know the complete product name and the manufacturer's contact information. Often products have similar names. Without knowing the specific product name and manufacturer, our office might not be able to identify the product that you want to use.

In some cases, the product that you propose for use will need to be fully reviewed by MOSA prior to use. This can be a time consuming process, but if you gather the required product information, this process can be sped up. The following provides details of the needed information for the routine products reviewed:

## Crop Fertility Products

- Naturally mined minerals are allowed. Examples include limestone, gypsum and rock phosphate. A statement from the manufacturer is required to verify that the mineral is naturally mined with no prohibited additives. Prohibited additives may include dust suppressants or pelletizing agents.
- Synthetic micronutrients are allowed if soil/plant deficiency is documented with a test. Exceptions include ammoniated, chlorinated and nitrate forms. Micronutrients in these forms are prohibited. If micronutrients are in a fertility product, MOSA will need to know chemical formula/name for each single micronutrient in the product. If inert ingredients are in the product, our office will verify that each inert ingredient is allowed.
- Biologicals, such as yeast and bacteria, are allowed. Our office must document the biological agent is non-GMO. This is verified by obtaining a statement from the manufacturer.
- Bulk manure is allowed, even from conventional operations. Off-farm manure must be verified to be free from prohibited additives. Our office documents this through the use of the MOSA Off-farm

see APPROVAL next page



Manure Bedding Verification form. If the manure is not composted according to NOP standards, and the manure is applied to crops for human consumption, the manure must be applied 90 days prior to the harvest of crops that touch the soil, or 120 prior to the harvest of crops that do not touch the soil.

- Manufactured manure products are allowed. This would include composted/pelletized poultry manure and similar products. Our office verifies that these products are composted according to NOP Standards and do not contain prohibited materials.
- Animal based products, such as feather meal, bone meal or blood meal are allowed if the product contains only animal materials. If animal based products contain additional ingredients, each ingredient will also need reviewed.
- Plant based products such as oils and molasses are allowed if they do not contain prohibited materials such as stabilizers or preservatives.
- Fish products are allowed. These products cannot contain synthetic preservatives except for those that are on the National list. For example, synthetic citric, sulfuric, or phosphorus acid can be used to lower the pH to 3.5.
- Natural inert/inactive ingredients within crop inputs are allowed, as long as the ingredient is not listed on 205.602. Synthetics materials must be listed on 205.601. Lignin sulfonate as a fertilizer binder would be an example.

#### **Livestock Feed Supplements**

- All agricultural ingredients must be certified organic with verification provided.
- Association of American Feed Control Officials (AAFCO) single ingredient vitamins and minerals are allowed. Manufacturer verification is required to document the minerals and vitamins are AAFCO listed.
- Certified organic based plant oils are allowed. The manufacturer must supply an organic certificate for the oil. Mineral oil or non-organic plant based oils are prohibited.
- If a product contains agricultural ingredients (such as wheat midds or rice hulls), the feed ingredients must be certified organic.
- Proteinated minerals are allowed if not produced using excluded methods (e.g. non-GMO verification) or derived from slaughter by-products. Our Excluded and Prohibited Methods form can be used for this documentation.
- Microbes (yeast and bacteria) are allowed. Verification that the microbes are not produced using GE methods is required from the supplier.
- Synthetic methionine is allowed in poultry supplements. Methionine cannot be used in quantities greater than two pounds per ton for chickens or three pounds per ton for other poultry.
- Naturally occurring compounds such as humates or leonardite are allowed if the supplier verifies natural status.
- Natural flavorings are allowed with documentation from the supplier. Synthetic flavoring agents are prohibited. Flavoring that is agriculturally derived must be organic.

#### **Livestock External Health Care Products**

- Active ingredients must either be a natural ingredient or a synthetic material listed on 205.603.
- Natural products include non-organic agricultural ingredients, such as neem oil, diatomaceous earth or plant based ingredients.
- Excipients (non-active, inert or other ingredients like carriers) are allowed if listed as Generally Regarded as Safe by the Food and Drug Administration.
- Cannot contain strychnine.

Although the requirements to review external health care products are generally simple, they really do not provide concrete examples of what can be used on your herd. The following elaborates on the commonly used synthetic external materials that are allowed.

- Ethanol for use as a disinfectant or sanitizer only.
- Isopropyl alcohol for use as a disinfectant only.
- Chlorhexidine for surgical procedures by a veterinarian or a teat dip when alternative active ingredients (iodine) have lost their effectiveness.
- Iodine for use as a sanitizer or topical disinfectant.
- Copper sulfate for use topical treatment, such as hooves.
- Lidocaine/Procaine for an anesthetic. Use requires a 90 day withdrawal for meat and 7 days for milk.
- Hydrated lime (calcium hydroxide) for external parasite control. Note this material is not allowed for cauterizing physical alterations or deodorizing animal wastes.
- Glycerin, derived from the hydrolysis of fats and oils, is allowed as a livestock teat dip

#### **Livestock Internal Health Care Products**

- Active ingredients must either be a natural product or a synthetic material listed on 205.603.
- Natural products may include non-organic agricultural ingredients, but if present the product may not be routinely used (up to four weeks for a health treatment).
- Excipients (non-active, inert or other ingredients like carriers) are allowed if listed as Generally Regarded as Safe by the Food and Drug Administration.
- Cannot contain strychnine

Similarly, the requirements for internal health care products do not provide details of what products can be used on your farm. Below outlines some of the more commonly used internal synthetic healthcare products.

- Aspirin to reduce inflammation.
- Atropine administered by veterinarian for poisoning. Use requires a 56 day meat and a 12 day milk withdrawal.
- Flunixin (Banamine) to reduce inflammation. Use requires a two times label withdrawal period for milk and meat.
- Electrolytes without antibiotics are allowed.
- Oxytocin for post calving therapy. Be aware that some milk buyers prohibit the use of Oxytocin.

## CLASSIFIEDS

### LIVESTOCK

For Sale: 12 Organic dairy springing heifers, mostly holstein some crosses. All bred to 100% Fleckvieh bull, due May through August. \$2550. Also 2000+ bushels of Organic shelled corn in a bin. D'Huyvetter Farms. Humbird, WI. 715-429-1000 or dhuyvetter1@gmail.com

Wanted: Organic Dairy Replacement Heifers. Holstein or other dairy breeds- can be crossbreds. 175 pounds up to shortbreds. Contact: Ray Gingrich, 11001 Co. 15, Harmony, MN 55939.

For Sale: MOSA Certified Organic Holstein Heifers. Three to freshen in May, eight to freshen in June & four to freshen in July and early August. All nice looking. Accelerated genetics. Easy calving bulls used. Good records for each that include vaccinations, sires and due dates. We have always had a closed herd. Elk Mound, WI. Call 715-879-5572.

For Sale: Eight, bred Scottish Highland cows (10-14 yrs old). Due to calve summer, early fall. 100% grassfed. On free choice organic mineral and kelp. Pastured year round. SE WI. Asking \$1,500/hd but willing to negotiate. Bull available. Contact Austin at 262-210-9804.

For Sale: 10 Organic jersey/jersey cross springing heifers. Due late March/April. All bred to New Zealand Genetics. New Holstein, WI. Call Kay- 920-894-4201 or email kwraig1980@yahoo.com.

For Sale: Large, fancy Holstein heifer for beef. La Farge, WI. Call David @ 608-479-1222.

Wanted: We will custom raise your organic heifers or steers. Our stocking density is 6100 lbs for 8.5 acres of improved, organic eligible pasture near Viola, WI. Cattle will be moved daily. We also have an additional five acres of organic eligible hay ground for rent. Call Alex for details at 608-625-4402.

Wanted: We will custom raise your organic dairy heifers. Certified organic feed. Call Matt for details 507-459-7719.

Wanted: Interested in buying all classifications of organic cattle and calves for meat production. Mike Noble, Kenyon, MN 507-789-6679..

### LAND

Land for Rent: Approximately 4 acres of organic creek-fed pasture available. We're new onsite, this property was formerly an organic dairy. Fencing may need mending. Open to trade. Located 3 miles from 14/61, north of Viroqua, WI. Call or text Luke @ 608-479-2128. (3-10-2016)

### EQUIPMENT

For Sale: John Deere 725FM. Six-row narrow front, front mount cultivator. Call Paul for pricing. 608-498-2882.

For Sale: Tyler 5-Ton Fertilizer Spreader. Like new condition. \$4800. Two Rivers, WI. Call 920-860-2118.

For Sale: Factory 20-ton Hydraulic Wood Splitter. Horizontal or vertical use. Three point hitch. 608-269-5150.

### MISCELLANEOUS

For Sale: Certified organic molasses. 5 gallon pails. FOB Verona Wisconsin 53593. \$70/pail. Discounts for larger quantities. Pure Sweet Honey Farm 608-845-9601, psh@chorus.net.

For Sale: Mr.K's garlic tincture & garlic vinegar approved for use as treatment in organic production. Helps with mastitis, scours, etc... 330-674-3999 x3.

### FORAGES & GRAINS

For Sale: MOSA Certified Pasture Mix Hay, 2015 crop. Large round bales stored inside. Seven left. \$50 each or best offer. Afton, MN. Call Chris at: 651 998-0507.

For Sale: 2016 Organic Rye and Rye Straw. Straw in large square bales. River Falls, WI. Pierce County. Call Jerry at 715-262-5115.

For Sale: 2016 Standing or Baled Organic Hay. Baled in large squares or bale your own. River Falls, WI. Pierce County. Call Jerry at 715-262-5115.

For Sale: Organic Shell Corn. River Falls, WI. Pierce County. Call Jerry at 715-262-5115.

For Sale: MOSA Certified Organic Balage. 1st through 4th crops. RFV 112-152. Protein 17-22%. Price per bale- \$35-\$50. Call Charlie at 608-634-3886 or 608-553-0087.

For Sale: 1st Crop Organic Balage. Tests available. 1200 lb 5x5 bales. Houston, MN. Call Al at 507-896-4620.

For Sale: Organic Soybeans, approx. 300 bu (uncleaned) located in Bonduel (near Green Bay) area. 2015 growing season. Please call 715-758-2280 or email me at ppawlak@ezwebtech.com.

For Sale: Organic dry hay round bales 1st, 2nd and 3rd crop; silage bales 1st crop; and straw. Delivery available. Sno Pac Farms. Caledonia, MN. 507-725-5281.

For Sale: 2015 Organic Hay. 4x5 roto-cut rounds. Dry & wrapped baleage. Tests available. 2015 Dry Shelled Corn for sale. 5,500 bu. Menomonie, WI. Call 715-664-8374 or 715-495-2813.

For Sale: MOSA Certified Organic Hay. 1st, 2nd and 3rd cuts. 3x3x8 bales. 1st and 2nd cut balage. Oats and peas balage. In-line wrapped. Test results available. Bales start at \$30 each. Stoddard, WI. Call Paul- 608-498-2882.

For Sale: MOSA Certified Organic Hay. 2nd crop grass/alfalfa mix round bales stored inside. 20.5% protein, 122 RFV. Decorah, IA. 563-382-8045.

For Sale: MOSA Certified Organic Corn 5000 bu. Certified Organic Alfalfa hay 2014 year 3rd, 4th cuttings RFV 152. South WI. Contact Ervin Landis 608-426-1726.

For Sale: Certified Organic Rye Straw. Big bales-\$40 per bale. Call 608-574-2494. Argyle WI.

For Sale: Certified Organic Barley Straw. Small squares of very clean, solid, tight bales. La Farge, WI area. \$4.00/bale. Call 608-479-1222.

For Sale: MOSA certified organic rained on hay, '4x5' round \$30.00 each. Also 1st crop hay, small squares, tested. About 40 bales '4x5' round 2nd crop \$ 60.00 each, tested. Medford, WI 715-748-6863 organichay11@hotmail.com.

For Sale: 2015 Organic Hay. MOSA certified. 3x3x8 large squares. Dry hay and balage. 105-153 RFV. Transportation available. Wonewoc, WI. Kent Wolf. 608-553-1136.

For Sale: 2015 Organic Oat Straw. MOSA certified. 3x3x8 large square bales. \$30 per bale. Transportation available. Kent Wolf. Wonewoc, WI. 608-553-1136.

For Sale: 1300 Bushels Organic Oats 35# TW. 1st, 3rd, 4th crop line wrapped round bales, feed test available. Cuba City, WI. Call Gary- 608-732-0237.

For Sale: High Quality Roasted Soybeans and numerous brands of organic farm seeds. Golden Grains. 608-269-5150.

For Sale: Organic 3x3x8 1st Crop Dry Hay. Test results available. Sparta, WI. 608-269-1748.

*To submit an ad to be posted in the printed version of the Organic Cultivator and on the MOSA website, send it to MOSA, PO Box 821, Viroqua, WI 54665, or email to [mosa@mosaorganic.org](mailto:mosa@mosaorganic.org). All ads will be posted for 60 days free of charge for MOSA clients (100 words max). For non-clients, cost of an ad is \$5.00 for 40 words, and \$0.10 per word over 40 (max 100 words).*

*MOSA does not guarantee that all products posted on this page are certified organic, and MOSA is not responsible for the accidental purchase of non-organic products through the use of this page. Always check to guarantee the certification status of any product before purchasing or using. ■*

## EVENTS

### MAY 2016

#### Women Caring for the Land: Conservation Training for Women May 4 | Ephraim, WI

The MOSES Rural Women's Project partners with the Women, Food and Agriculture Network to offer FREE workshops in Wisconsin teaching women landowners how to improve water and soil quality on their land. Participants learn about conservation-focused land management practices, discover local resources and government programs that can help fund environmentally friendly land management, and meet local female conservation experts and other women landowners who are interested in conservation. The day includes a bus tour of farms that utilize conservation practices. <https://moses-organic.org/rural-womens-project/events/>



### **Cottage Food Tier 2 Sales Workshop**

**May 11 | Alexandria, MN**

The University of Minnesota Extension created this workshop that will meet the training requirements to register as a Minnesota Cottage Food Producer with annual sales of \$5,001-\$18,000 per year. This advanced course focuses on food safety practices for all processes covered under the cottage food law including drying, baking, confections, jams, jellies, acid and acidified fruit and vegetables and fermentation. Participants also learn packaging, labeling, storage, and transport of safe food products. Graduates of the training will also be qualified for the Tier 1 Sales requirement (applying to sales of \$5,000 or less). Call Connie at (507) 337-2819 or go to <http://www.extension.umn.edu/food/food-safety/courses/cottage-foods/index.html>.

### **Tractor Basics and Implement Demo**

**May 17 | St. Croix, MN**

The Minnesota Food Association hosts MFA Farm Director, Molly Schaus and Humble Pie farmer, Mike Leck as they share their experience with farm implements and tractor basics. Register by May 13th with Ethan at [ethan@mnfoodassociation.org](mailto:ethan@mnfoodassociation.org) or 651-433-3676

### **Terra Firma: A Celebration of Women Veterans** **May 17 | Mt. Vernon, KY**

Since 2001, over 280,000 women have been sent to the Middle East to serve in the War on Terror. Many return traumatized by their experiences. The film, Terra Firma, weaves together the stories of three women veterans who were among the first to deploy. After years of struggling, each has found ways to heal the hidden wounds of war through farming. The film follows the women as they go about their daily lives, reflecting on their time in the military, the impact of war on their lives, and their newfound purpose and peace of mind serving their country by growing food for their communities. This screening is presented by GROWING WARRIORS. For more, go to <http://terrafirmafilm.com/>.

## **JUNE 2016**

### **Farm to Cafeteria Conference: Moving Forward Together**

**June 2-4 | Madison, WI**

Registration for the conference opens Feb. 15, 2016. This program will include more than 40 workshops, plenary addresses delivered by leaders in the farm to cafeteria and local food movements, networking opportunities, a series of 5-minute "lightning talks", a poster session and resource share fair, entertainment and an evening reception showcasing Madison's vibrant local food culture. Go to [www.farmtocafeteriaconference.com](http://www.farmtocafeteriaconference.com).

### **Webinar: Life in the Soil - Microscope Class**

**June 9-July 7 | Online**

Elaine Ingham leads this course training people to use simple, but effective shadowing light microscope methods to identify soil biology. Learn to identify bacteria, fungi, protozoa and nematodes that drive the health

and well-being of our plants. Students are required to have their own microscopes to follow along with the videos. Call 530-589-9947 or go online to [www.lifeinthesoil.com](http://www.lifeinthesoil.com).

### **Bison Advantage Workshop**

**June 11 | Baldwin City, KS**

The National Bison Association has received SARE funding to host a series of workshops across the country introducing producers to this emerging sector of sustainable American agriculture. This introductory course covers holistic management and marketing of bison, a free bison "toolkit" of invaluable production education materials, a tour of the host ranch, lunch, and a networking hour. This workshop and field day is hosted on the Hanna Buffalo Ranch – a working bison operation with sustainable management practices. You must register no later than one week prior to the workshop date to take advantage of this FREE opportunity. Register by email: [jim@bisoncentral.com](mailto:jim@bisoncentral.com) or call the National Bison Association at 303-292-2833.

### **Food Safety on the Farm Field Day**

**June 14 | Marine on St. Croix, MN**

The Minnesota Food Association Farm hosts this field day devoted to teaching vegetable farmers what they need to understand about food safety. Learn how to integrate food safety in your farming practices. Go online to <http://mnfoodassociation.org/classes-and-farm-tours>.

### **Crop Establishment and Scheduling for Direct Seeded and Transplanted Crops**

**June 26 | Alma, MI**

This Michigan Farmer Field School course provides an intensive focus on stand establishment in vegetable crop production. It covers seed, seeders, germination, and knowing when to till your field for direct seeded crops. The workshop also covers field establishment from greenhouses and explores various methods of transplanting and transplant management. For workshop questions, contact Megan at 734-718-5506 or go online to <http://www.msuo-organicfarm.org/farmer-field-school.html>. ■

*cont. APPROVAL from page 9*

■ Fenbendazole, Ivermectin and Moxidectin for parasite control. Use will remove animals from slaughter eligibility. Cannot be used during the cattle lactation period or the last third of gestation. Milk must be withheld for 90 days. Moxidectin can be used for internal parasites only.

Often, product review for crop, livestock and handler materials are relatively quick and simple. However, at times product review can be time consuming for office staff. Some manufacturers are slow to respond and do not always understand what type of information is needed for review. Be aware of this when requesting a product to be reviewed and be prepared that we might not be able to give you a timely answer. Often our office will be able to provide you with a list of alternative products for organic use. Using a product without MOSA approval can put your operation at risk. Before any new product is used in your operation, remember to seek MOSA approval prior to use.

Figure 1 – Look for the OMRI Seal. ■





MOSA  
P.O. BOX 821  
VIROQUA, WI 54665  
608-637-2526

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## MOSA BOARD OF DIRECTORS

Adrian Plapp, President,  
815-825-2589  
[ajplapp@aol.com](mailto:ajplapp@aol.com)

Katrina Becker, Vice President  
715-432-4683  
[info@stoneyacresfarm.net](mailto:info@stoneyacresfarm.net)

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[stonehoeing@gmail.com](mailto:stonehoeing@gmail.com)

Denise Thornton, Secretary  
608-469-1193  
[thornton.denise@gmail.com](mailto:thornton.denise@gmail.com)

Annalisa Hultberg, Director  
612-532-4888  
[hultb006@umn.edu](mailto:hultb006@umn.edu)

Sue Baird, Director  
660-427-5555  
[suebairdorganics@gmail.com](mailto:suebairdorganics@gmail.com)