FROM THE DIRECTOR

I hope you are enjoying the beautiful summer, and all its special gifts! As we move through the year, the work of MOSA reflects the work of our clients. We’ve received your organic system plans, and we are either making plans for or have already completed your annual inspection. One item that is worth mentioning to farmers is that a MOSA inspector is required to view your land before we can add it to your organic certificate; that means if a new parcel has become available to plant or graze, we need to check it out before you can sell any product or use the land for grazing. This is an NOP requirement, and it oftentimes can lead to a last-minute scramble for both our clients and inspectors. We would like to be as proactive and sensible as possible about it so if you are thinking about expanding to a new pasture or field, maybe later this year, maybe next year, let your inspector know this year during inspection so if possible, s/he can take a look and document that we’ve seen the land.

Something else worth talking about is surveillance inspections. The NOP recommends that every year, 5% of our clients, producers and processors, have an unannounced surveillance inspection. If this happens to you, don’t panic. This

FROM DIRECTOR on page 7

ST. BRIGID’S MEADOWS LLC
Vince and Dawn Hundt: Adding Value with Direct Marketing

by Joe Pedretti, Outreach Manager

Vince Hundt grew up on a dairy farm, six miles from his current farm near Coon Valley, WI. After college, and an opportunity to see the world, he returned to the area, got married, and started farming. For a few years they rented, but in 1978, the Hundts purchased their current farm and began milking a 43 cow herd. A subscription to Organic Farming and Gardening magazine helped them start down their path to organic agriculture. “By the late 50’s, my family’s farm started to modernize and we adopted the University recommended programs and started using atrazine to kill weeds in corn. When we started farming, we also used some atrazine on the corn and some potassium chloride fertilizer. We were a classic small dairy that fed what we raised and raised what we fed. By the late 80s though, we started to see the light and stopped using atrazine to kill weeds...
Biosecurity and avian influenza continue to be topics to pay attention to with continuing confirmation of cases of highly pathogenic avian influenza (HPAI) in the Midwest. If confinement in your area continues to be necessary or if you become aware of a new threat in your area, contact MOSA to discuss plans for confinement. Inspections on farms that have poultry and are located near affected areas will be conducted later in the year after the risk has subsided. Please discuss all biosecurity concerns with your inspector prior to their arrival at your farm.

Origin of Livestock Proposed Rule Published! Comments are due July 27th. It’s been talked about for years! The proposed rule adds clarity to transitioning rules for dairy farmers. We’ve reviewed the proposed rule and note that some of our policies would change if this rule is implemented as written. This action could apply to you if you are engaged in the dairy industry. If you are not sure if or how this action would affect you, please contact our office to discuss your Organic System Plan.

Summary of Provisions
This proposed rule would update the regulation by explicitly requiring that milk or milk products labeled, sold or represented as organic be from dairy animals organically managed since at least the last third of gestation, with a one-time exception for transition. This exception would allow a producer, as defined by the regulations, to transition nonorganic dairy animals to organic milk production one time, under specific conditions.

This proposal would specify that a producer (e.g., an individual or corporation starting or operating a dairy farm) could transition nonorganic dairy animals to organic milk production one time over a single twelve-month period. The proposal would require that all transitioning animals end the transition process at the same time.

This proposal would specify that, once the transition into organic production is complete, a producer would not be allowed to conduct any additional transitions. After the transition, the producer would only be able to expand the number of dairy animals or replace culled dairy animals on dairy farm in two ways: (1) Add dairy animals that had been under continuous organic management since the last third of gestation, or (2) add transitioned dairy animals that had already completed the transition on another dairy farm during that producer’s one-time transition.

The proposal would define a dairy farm as “specific premises with a milking parlor where at least one lactating animal is milked.” For the purpose of this definition, a milking parlor should be considered a physical structure (e.g., barn, parlor) in which dairy animals are milked. Because the dairy farm definition, in part, drives the eligibility for a producer to transition animals to organic production, this action would mean that producers who only raise heifers for organic dairy farms would not be eligible to transition conventional animals to organic. Such producers do not milk animals and, therefore, would not be considered eligible for the one-time transition exception. However, such producers could continue raising heifers for organic dairy farms as long as the animals were under continuous organic management from the last third of gestation.

This proposed rule reiterates that breeder stock may be brought from a nonorganic operation onto an organic operation at any time and clarifies that breeder stock may nurse their own young only. AMS also clarifies that organic fiber bearing animals must be organic from the last third of gestation.

Implementation Proposal: The Agricultural Marketing Service is considering and seeking public comment on the following implementation proposal:

• Producers who are certified as of the effective date for any final action would be allowed to complete any transition that was already approved under their organic system plan by a certifying agent. However, as of the effective date, producers who are certified would be required to source or raise any new animals from last third of gestation or source animals already transitioned under another producer’s one-time exception.

• As of the effective date, producers who are new applicants for organic certification (i.e., startup organic dairies or nonorganic dairies transitioning to organic production) would be allowed to use the transition exception once when first applying for organic certification.

Planning to comment? Interested parties may submit written comments on this proposed rule using one of the following methods:

• Federal Rulemaking Portal: http://www.regulations.gov Follow the instructions for submitting comments.


Instructions: All submissions received must include the docket number AMS-NOP-11-0009; NOP-11-04PR, and/or Regulatory Information Number (RIN) 0581-AD08 for this rulemaking. Commenters should identify the topic and section of the proposed rule to which their comment refers. All comments received will be posted without change to http://www.regulations.gov.

Docket: For access to the docket, including background documents and comments received, go to http://www.regulations.gov.

For Further Information Contact: Andrew Perry, Director, Standards Division, Telephone: (202) 720-3252; Fax: (202) 205-7808.

Reminder – Check your retail labels for compliance! If you recall, the NOP issued Policy Memo 12-2 in January 2013 which clarified that the required ‘certified organic by’ (COB) phrase be below the information identifying the handler or distributor on retail labels for 100% organic, organic, and “made with organic...”. The NOP gave a lengthy transition period for changes to be made. Labels for existing clients must be in compliance by January 1, 2016. During the 2015 review year, we’ll be verifying that your labels are or will be in compliance before that date. Remember that all new labels need to be approved prior to use.

See the “What Certifiers Look for in Retail Labels” article in this issue for more details.
By the mid-2000s, the company had gotten so big that it was better to have all of the staff and manufacturing together at the manufacturing facility in St. Martin, MN, where manufacturing had moved to in the early 90’s. “I handed off responsibilities to others, and now I focus mostly on international sales. No matter where you are in the world it is interesting how fast something can grow and how many peoples lives are affected. During the 1990’s in particular, the Rotochopper company dominated my life” reflected Vince. Today we have over 100 employees and machines all over the world.

In the fall of 2007, the Hundts bought the farm down the road, “a beautiful small dairy farm that I could not resist,” and started an organic dairy. They remodeled the barn, bought jerseys and started intensive, rotational grazing. Simultaneously, they founded the St. Brigid’s Meadows brand so they could direct market their dairy, pork, beef, poultry and egg products.

Vince hired a family to manage the dairy herd, while he and Dawn focused on the beef, poultry, crops and developing the branded business.

“The good thing about direct marketing is you don’t worry about commodity competition, but there is a lot that needs to be learned. It is fun. Our customers tell us how much they love our products. They know where it is coming from and that it is really good,” said Vince. “Farming is rewarding when you see healthy animals and crops, and you can share that we people that you get to know who appreciate what you are doing. Direct marketing is for farmers that enjoy working with people.”

A few years ago, the Hundts decided to discontinue dairying. “It was a very hard decision, but we had a difficult time keeping steady help. We gave it several tries, but unfortunately, we weren’t able to make it work.” They have instead decided to focus on the beef, poultry and pork products while partnering with a small organic dairy farm down the road to supply dairy products. To this end, they have just built a brand new on-farm retail store and a new laying hen house at the dairy farm. “Pork, beef, poultry, eggs, cheese and some local produce are enough to get people to drive to the country and visit a farm and buy some really fresh groceries,” emphasized Vince.

Vince is particularly happy with the soil improvements he has seen since adopting a rotational grazing system. Since 2008, he has been able to raise his soil organic matter by a full percentage point. Vince relies on his pastures and a three-crop rotation of corn, small grains and hay to produce the feed he needs for his livestock.

In 2008, when Vince began rotational grazing, he recognized the need to provide portable shade that could be moved from paddock to paddock to keep animals comfortable and evenly distribute manure. He was surprised to find that despite the popularity of rotational grazing, no one had created a successful portable shade. Working with two recent college graduate friends of the family, in 2012 they created the first prototype of the Shade Haven—a mobile shade canopy. With a few refinements, they began to actively market the new product. Their first show was the Organic Farming Conference in 2013, where they sold the first two Shade Havens. They now make five or six a month and have sold over 40 units with sales speeding up as word gets out. “It’s never too hot if a cow has shade,” noted Vince. “The #1 reason people buy these is because they love their animals and they love grass. On top of that these units can pay for themselves in a few seasons through improved productivity, and we have the university data to prove it.”

Vince and Dawn love to share their love of farming and have hosted many field days, pasture walks and school tours over the years, and are happy to announce an organic farm field day in partnership with MOSA on Thursday, July 23 from 10 a.m. to 3 p.m. at their farm near Coon Valley, WI (details in EVENTS on page 11). Join the Hundts for this informative and entertaining look at their diverse and successful organic farming operation.
In my early days at MOSA, Steve Walker, our Compliance Manager, mentioned that he enjoyed reviewing organic retail labels while grocery shopping. At the time, I thought Steve needed more excitement in his life, like when I re-arrange my sock drawer. OK, not that kind of excitement, but seriously, what was he looking for? All organic products are the same; they’re organic, right? I think that many consumers of organic products have this mindset. However, organic claims on retail labels vary considerably and it is the job of accredited certifiers, such as MOSA, to determine if label claims meet the requirements of the rule.

Of course, before I get started, I need to point out it’s the National Organic Program standards that regulate the retail labeling of organic products. Specifically, I am referring to sections 205.300 through 205.311 of subpart D: Labels, Labeling and Market Information of the National Organic Standards (http://www.ams.usda.gov/AMSv1.0/nap). These sections regulate how the term “organic” is used in the marketplace and detail how ingredient information is provided to consumers. The purpose of this regulation is for consumers to understand what type of organic product they are purchasing. Although it is a good idea for our clients to understand subpart D, MOSA’s services include providing insight and guidance on compliant label development. This article hopes to provide such assistance.

There are two general types of retail labels, multi-ingredient foods products (e.g. cereals and frozen pizza) and single ingredient products (e.g. cherry tomatoes in clamshell boxes). The principal display panel is the section of the package that is most readily viewed by the customer. The standards require certification for products which make an organic claim on their principal display panel, or the use the USDA Organic Seal. Separate from the principle display panel, the information panel is where the ingredients are listed in the order of predominance. Typically, the information panel is to the immediate right of the principal display panel. For some products, the information panel may be within the principle display panel. Both sections of a label may make an organic claim and any labels making organic claims must be approved by MOSA before use. Producers who gross less than 5000 dollars in annual organic sales may not need certification, but these producers must also follow the labeling rules defined by the National Organic Program.

Certified organic multi-ingredient foods are usually sold using one of three different labeling categories: “100% organic”, “organic” or “made with organic (specified ingredients).” Products labeled as “100% organic” must only contain 100% organic agricultural ingredients. Processing aids, if used, must be certified organic. Processing aids include substances added to food during processing for a technical or functional purpose, which are present at insignificant levels in the final food product. Examples include organic vegetable oil used to coat a baking pan, or organic butter used as a maple syrup defoamer. On the information panel, “100% organic” products must identify the certifying agent and may describe all the ingredients as organic.

If making an “Organic” claim on a product label, all agricultural ingredients must be certified organic, except some minor agricultural ingredients may be nonorganic if they are found on the National List of Allowed and Prohibited Substances (National Organic Standards section 205.606). This list allows the use of nonorganic ingredients when organic ingredients are not commercially available. Examples include intestine casings (yum!) for sausages and plant based dyes, such as beet juice. However, documentation is required to show that equivalent organic ingredients are not available, and the nonorganic ingredients are non-GMO, not irradiated, and not produced using sewage sludge.

Nonsynthetic and synthetic processing aids can be used in products labeled “Organic” as long as the ingredients are on the National List at section 205.605. Examples of allowed nonsynthetic and synthetic processing aids include dairy cultures or ethylene gas for fruit ripening. “Organic” products must have at least 95% organic agricultural content. Therefore, the combined nonorganic agricultural ingredients and processing aids cannot exceed more that 5% of the product composition, by weight or volume. Water and salt are excluded from percentage calculations. Products labeled as “Organic” must state the name of the certifying agent and identify the agricultural ingredients as organic on the information panel.

Products containing 70 – 95 % organic agricultural ingredients are labeled as “Made with organic (specified ingredients or food groups).” The principal display panel can state “Made with organic...” but this statement may only list up to three organic ingredients or ingredient groups, as specified in the Standards. Examples of ingredient groups include sweeteners, grains and fruits. All the ingredients in the listed group must be organic and identified as organic on the information panel. Remaining agricultural ingredients do not need to be organic, but must be produced without genetic engineering, ionizing radiation or sewage sludge. Nonsynthetic and synthetic processing aids must be listed on 205.605. A “Made with organic...” label cannot use the USDA Organic Seal, but must identify the accredited certifying agent. The combined nonorganic agricultural ingredients and processing aids must not exceed more than 30% of the overall product composition.

So with all this in mind, you ask, “What do I need to do to develop a compliant retail label”? The first step is to determine what labeling category your particular product falls under. Remember, products can be labeled as “100 percent organic,” “Organic,” or “Made with organic...”. The proper category may be determined by using a MOSA Organic Product Profile form. On this form, you list all your ingredients, as described above. Considering the organic content of each ingredient, you can calculate the overall percentage of certified agricultural content in your product. This form will be specific for each product you label and MOSA staff will help determine whether your calculations are correct. More details on Organic Product Profile forms are discussed below.

Whether you make a “100 percent organic,” “Organic,” or “Made with organic...” claim, you must identify your certifier on the information panel. The National Organic Program Policy Memo 12-2 (http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5100371) outlines the use of the “Certified Organic by” (COB) statement on organic products. This statement is required. After January 1, 2016, the
COB statement must be placed below the information identifying the handler or distributor of an organic product. The information identifying the handler or distributor is typically the name of the operation with contact information such as address or website. Contact information should be detailed enough so that a consumer can easily obtain further information about the company. Finding more information could be done in a variety of ways, including contacting the identified accredited certifying agency, or contacting the company through a phone call, website search, or written correspondence. For MOSA certified operations, the COB statement will usually state “Certified Organic by MOSA”; but similar statements may be allowed if they contain the words “certified,” and “organic.” The new MOSA logo can be used in place of the COB statement, if the logo is in the proper location. MOSA expects the COB statement to be directly below your contact information. Our new logo can be found at our website (http://mosaorganic.org/logos/) for downloading. Our logo is visually appealing and may serve a better marketing purpose than a written COB statement.

Now that we have done our homework, let’s look at a retail label. Kickapoo Coffee has been MOSA Certified since 2006. They label a particular coffee variety, Wedge Blend, for the Wedge Community Coop (also MOSA certified) in Minneapolis, MN. Figure 1 shows the principle display panel for this coffee product. A consumer looking at the label would identify the product as organic and, if well versed, would understand the word “organic” to mean that at least 95% of the ingredients (i.e. coffee beans) were certified. To verify this label claim, organic handlers submit an Organic Product Profile form to our office. This describes whether the ingredients are certified organic agricultural, non-organic agricultural, non-agricultural synthetic, or non-agricultural non-synthetic. In the case of the Wedge Blend Coffee, the only ingredient is either organic Peruvian or organic Mexico coffee. To verify the ingredients, current coffee supplier certificates are requested by MOSA. The supplier, Cooperative Coffee, is certified by OTCO and, since the ingredient is certified as “100% organic”, we can determine there are no nonorganic agricultural ingredients or processing aids in the coffee. In this case, Kickapoo Coffee could have claimed the Wedge Blend coffee was 100% organic, but chose to describe the coffee as “Organic”. In my opinion, most consumers don’t readily discern between “Organic” and “100% organic” claims. It’s not uncommon for products that qualify as “100% organic” to just be labeled as “organic”.

Decaffeinated coffees cannot make a 100% organic claim, even though they also usually contain “just beans”. This is because a non-organic processing aid is used in the decaffeination process. Supplier certificates for decaffeinated coffee beans do not identify them as “100% organic”. So, roasters should not list decaffeinated beans on the MOSA Organic Product Profile form as “100% organic”.

The information panel (Figure 3) is where the COB statement is typically located on retail labels. The Wedge Blend label correctly places the COB statement below the contact information for Kickapoo Coffee. Although Kickapoo Coffee chose to identify us by
THE CHANGES WE FACE

Thoughts about the Passing of Time, Global Urgencies, Revolution, and Hope

by Stephen Walker

Every so often we should pause and look back on where we’ve been, where we are, and where we’re headed. Sometimes annual cycles, like the holidays or an anniversary, beg such taking notice. Other times, the evident passing of time catches me by surprise, but still urges me to “pay attention!” Lately, I think I’m more frequently taking notice of life’s passages, trying to picture the forest while I’m here in the midst of the trees, in the thick of my middle years. There’s more now to look back on, maybe a bit more wisdom and perspective, and still more driven work to come. This pondering has been pretty prevalent since a few months back. The annual MOSES Organic Farming Conference got me comparing my life’s journey with some changes we face in this organic movement.

I started my work with MOSA on the weekend of the 2001 Organic Farming Conference. Then, I somewhat stumbled into this career by answering an ad in the paper, by being in the right place at the right time, and maybe by following some bliss and some sense of mission. With a sort of aversion to boxes and a call to the land and self-sufficiency, in the late 1980’s I learned a lot of core organic principles by working a little homestead. Working with plants and building soil brought peace and affirmation. I discovered John Jeavons’ biointensive methods and his research on how to grow complete diets in the least space possible, with full closed-system sustainability. After years of double digging, composting, and thinking about carbon, in 1997 I attended a workshop at Jeavons’ farm in Willits, CA. There I heard sobering statistics regarding increasing world population, vanishing topsoil, and impending food security challenges. I gained a new sense of urgency, and more affirmation from my always-improving raised beds.

At that 2001 Organic Farming Conference (OFC), I attended a workshop regarding calculating how much land it takes to support our lifestyle, our “ecological footprint.” We learned that, extrapolating for increasing individual consumption and population growth, we would soon need several extra planet earths to support our global lifestyles. In November-December, 2001, I wrote an article for The Organic Broadcaster (“Footprints in the Soil”) which compared our big footprints to escalating world disaster statistics, and proposed that radically sustainable agricultural systems offered hope for critical change. The urgency was real then, is more imminent now, and we still find answers by being close to the soil.

Now, I’ve been to the OFC 15 times. This annual ritual brings gratitude for this organic community and the needed inspiration to keep on plugging away at my work. This year, the keynote speaker was John Jeavons. Now, all of a sudden it seems, it’s half of my life ago that I first was inspired by his work. It was clearly time to pay attention to this point in my journey, to review my path so far, and to listen for next steps. On one hand, I am impressed by how far we have come. I also was struck by how the urgencies remain, how the global concerns from 15 or 20 years ago are still with us, and closer to home. In that 2001 article, I drew attention to indicators predicting that by 2014, the earth may not be able to support humanity by common farming methods. Here at the OFC in 2015, we heard a Scientific American report (http://www.scientificamerican.com/article/only-60-years-of-farming-left-if-soil-degradation-continues) stating that with ongoing soil degradation, all of the world’s topsoil may be gone in 60 years. That would mean NO farming. Climate change is upon us. Pollinators are threatened... Suffice it to say, there is plenty more to be concerned about these days.

A few days ago here in the office, a couple of us MOSA folks had a brief discussion about an emerging dystopia in light of our current global crises, and how we may need to consider radically alternative food production systems. At the OFC, Jeavons noted that typical organic production systems are steps in the right direction, but still can deplete topsoil. So, he said, we need to “keep on walking.” His biointensive methods are fairly far down the path from where even most organic operations are right now. His proven methods offer solutions, but probably require some openness to revolution. Having experienced the many fruits of his low-tech methods, in our brief office discussion I proposed that radical alternatives might actually be more utopian than dystopian.

A few years back, at a gathering for my 10th anniversary at MOSA, our Administrative Manager Gabrielle Daniels gave me a copy of Grace Lee Boggs’ 2011 book, The Next American Revolution. A theme in this book is that dystopian problems do indeed make the time ripe for “solutionary” revolution. Boggs writes, “We have obviously reached a turning point not only in the history of the human race, but also in the history of planet Earth... If in this period, we, and all living things on this planet, are extinguished, it will not be by an external cause. It will be because of the extravagant, thoughtless ways that we have been getting and spending and seeing little in Nature that is ours. Our challenge is to recognize our responsibility for the economic meltdown and the planetary emergency and transform our way of life accordingly... The next American Revolution, at this stage in our history, in not principally about jobs or health insurance or making it possible for more people to realize the American Dream... It is about acknowledging that we Americans have enjoyed middle class comforts at the expense of other peoples all over the world. It is about living the kinds of lives that will not only slow down global warming but also end the galloping inequality... It is about practicing a new, more active, global and participatory concept of citizenship. It is about becoming the change we want to see in the world.”

At the OFC, I always find elements of my envisioned utopia, and I am always impressed by so many folks who are becoming the change they want to see. We’re a pretty hopeful community. There’s simple hope in the seeds we plant each year, in trusting in the soil. And there’s hope to “pay attention!” Lately, I think I’m more frequently taking notice of the holidays or an anniversary, beg such taking notice. Other times, and maybe by following some bliss and some sense of mission. With a sort of aversion to boxes and a call to the land and self-sufficiency, in the late 1980’s I learned a lot of core organic principles by working a little homestead. Working with plants and building soil brought peace and affirmation. I discovered John Jeavons’ biointensive methods and his research on how to grow complete diets in the least space possible, with full closed-system sustainability. After years of double digging, composting, and thinking about carbon, in 1997 I attended a workshop at Jeavons’ farm in Willits, CA. There I heard sobering statistics regarding increasing world population, vanishing topsoil, and impending food security challenges. I gained a new sense of urgency, and more affirmation from my always-improving raised beds.

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and Life Sciences at UW-Madison. This shows that more young and beginning farmers grow organically. This vitality blooms at each OFC, visible in the smiles and enthusiasm.

Beyond the numbers and the now, there’s hope for what we can become. Organic people have special skills. We’re not constrained by boxes. We’re visionary. We can think big, and small. We’re accustomed to thinking holistically, to seeing the forest. And we’re attuned to microcosmic subtleties, which matter. We’ve got the aptitude for revolution. I trust that moving our feet will bring our good fruits to bear, and I look forward to continuing to be a part of that.

So, over the last several months, I’ve taken a few pauses to ponder this. At one point, I was talking about some of this life’s journey with my wife, and she said, “Sometimes when you think you’re not going somewhere, you really are.” She’s right, as usual. Many times I’ve felt like I’m walking fast just to stay in place. But, with pause and assessment, I realize I’ve gotten to somewhere special. I’ve been thinking about how I came into this good life, shared with so many talented folks. I’m thankful for new opportunities to plant good seeds. And I have a whole lot of trust and affirmation that the kids are going to be alright. My strongest feeling is gratitude, which motivates me to keep me walking, with continued revolutionary urgency. You might call it gratitude, with attitude.

cont. LABELS from page 5

using the acronym MOSA, they could also have spelled out our full business name, or used our current MOSA logo. Since we recently redesigned our logo, sometimes we still find our older logo on labels that we review. We are asking clients to switch to our new logo, by the end of 2015.

Another item on the information panel worth discussing is the written description of Kickapoo Coffee and the Wedge Cooperative. We sometimes refer to this additional information as the label’s “romance language.” Romance language often describes value added components of the product and provides “softer” business information for the consumer. All organic claims must be appropriate. Because of this, we also check romance language for compliance. In the case of the Wedge Blend coffee, the romance language uses the word organic, but its use is consistent with the COB statement, the principle display panel and the Organic Product Profile form submitted by Kickapoo coffee. As you develop labels, remember that any organic claim must be consistent with your product composition and labeling category.

This article provided a simple, but important, overview of label requirements. MOSA has a few additional requirements for companies that co-pack or apply labels for private label customers. A private label is when a product is made by one manufacturer, but is sold under another entity’s brand name. Private labels do not usually disclose the arrangement between the manufacturer and company branding the product. Our oversight and review of private labels enables transparency and compliance of organic claims in the marketplace.

Label considerations are unique for each producer or processor that we certify. When developing a label, it is best to discuss your specific situation with MOSA. All labels making organic claims must be approved by MOSA prior to use. Don’t worry though, we are good at reviewing labels and this service is provided with your certification fees. Communication is critical so that you develop a compliant label before it is printed and applied to your product. Correcting compliance issues before printing will also save you time and letterpress costs. Sometimes, our additional eyes can prevent other mistakes, like spelling errors or compliance issues with other regulatory agencies. Remember, your label is the first thing that consumers see.

Before I started working at MOSA, I paid little attention to organic claims made on products labels. If the product was described as organic, I thought that was all I needed to know. Now that I am actively involved with organic agriculture, I pay greater attention to labels when I shop. Who knows, if you see a handsome middle aged man at the grocery store scrutinizing an organic product label, it could be me. If you have any question on labeling requirements, please contact our office.

cont. DIRECTOR from page 1

doesn’t automatically mean that we are responding to a complaint (although sometimes we may be), and we aren’t hoping to “catch you.” During a surveillance inspection, the inspector has a pre-determined purpose. S/he will be looking at something particular in your operation that we’ve identified as worth taking an extra look, and verifying that your practices and procedures match what you told us on your organic system plan. The inspector may give you a call up to four hours in advance to let you know s/he’s on the way, and while on-site the inspector will be as efficient and brief as possible.

In the last newsletter, I mentioned that this summer MOSA will hold regional meetings/field days. I’m so happy to tell you that we have two scheduled; July 23 at St. Brigid’s Meadows in Coon Valley, Wisconsin, and September 16 at Gardens of Eagan in Northfield, Minnesota. For more details, there is additional information in this newsletter. Many of MOSA staff will be in attendance to meet and talk with you, and we are so grateful to Vince and Dawn Hundt, and Linda Halley, for hosting. We would be very glad to see you there! Feel free to bring a friend or neighbor.

As always, if you have any questions or comments about anything in this newsletter – or about MOSA – please feel free to contact me at cskolaski@mosaorganic.org or 608-637-2526. Thank you for reading, and thanks for your continued commitment to organic integrity.
The spring meeting of the National Organic Standards Board (NOSB) was April 27-30, in La Jolla, CA. I attended the meeting, along with our Certification Review Manager, Feliciana Puig. As of our last Organic Cultivator’s deadline time, we could only describe issues up for discussion, and subcommittee recommendations. Now we have a summary of meeting highlights and decisions. As usual, this meeting included a lot of passionate and thoughtful comments from the public, and presented opportunities for sharing perspectives with colleagues. The agenda was heavily focused on the 2016-17 sunset reviews, which will determine whether over 150 fertilizers, pest control products, processing aids, and ingredients currently allowed for use by certified organic operations should still be allowed for use. Full meeting details, including original discussion documents—and a full transcript of nearly 2000 pages—are available at the NOSB website (http://www.ams.usda.gov/AMSv1.0/ams.fetchTemplateData.do?template=TemplateJ&page=NOSBMeetings).

Decision, Debates and Next Steps
Stephen Walker, MOSA Compliance Manager

NOP UPDATE
National Organic Program (NOP) Deputy Administrator Miles McEvoy began the meeting with an update on recent NOP work, including publication of the long-awaited ‘origin of livestock’ proposed rule, now open for public comment. He also noted that we should soon expect rulemaking on the (2011) NOSB animal welfare recommendation, and noted other rulemaking priorities for NOP: aquaculture, pet food, sodium nitrate, mushrooms and apiculture. He also discussed grower group certification policies, responding to pesticide drift, inspector qualifications, and private labels. McEvoy stressed the importance of collaboration, partnership and good communication. In response to criticism on lack of public comment opportunities for NOP policies, NOP is exploring publishing interim policy memos, which will enable feedback. McEvoy’s update also addressed controversial issues such as hydroponics, nanotechnology, electrolyzed water and biodegradable mulch.

PUBLIC COMMENTS
At this meeting, over 120 members of the public commented on many issues. These accompanied approximately 1250 written comments, and it was stressed that the Board does read every comment. In my verbal testimony, I highlighted key points from MOSA’s written comments (available on our website [http://mosaorganic.org/] under News and Events). I also stressed that the unique ability of certifiers to (anonymously) provide information on materials we see in organic use should be seen as valuable reporting on—not advocating for—the continued allowance of such materials. I also expressed concerns regarding consumers’ confidence in organic when they hear headlines regarding our passionate but nuanced industry debates, without hearing full context. I proposed that we consciously seize opportunities to tell the good story of the good authority of the organic label, as a healthy label floats all boats.

NATIONAL LIST SHRINKS
The agenda included review of ten petitioned materials, 12 materials for 2016 sunset review, and 198 material listings for Sunset 2017 sunset. Five inputs for processing/handling operations were voted to be removed from the list of allowed non-organic ingredients: Egg White Lysozyme; Boiler Additives (Cyclohexylamine, Diethylyaminomethanol, Octadecylamine); and Tetrasodium Pyrophosphate. Each of these ingredients or processing aids was deemed as non-essential to organic handling due to the availability of natural/organic alternatives or alternative processing practices. For livestock, Zinc Sulfate and Acidified Sodium Chlorite were successfully petitioned for addition to the List as alternative healthcare treatments. All other petitions failed; for proposed crops and handling materials.

GOING OFF THE LIST?
Sunset reviews for 2017 will be completed at the next NOSB meeting this October in Vermont. Several materials are being considered for removal from the list, or were specifically noted as receiving few comments to support relisting.

For handling, these include: (Non-agricultural) Waxes (Carnauba, Wood Resin), ammonium bicarbonate, magnesium carbonate, magnesium stearate, potassium phosphate, sodium phosphates; and (Agricultural) Chia seeds, chipotle peppers, frozen lemon grass, celery powder, colors, gelatin, dillweed oil, frozen galangal, whey protein concentrate, sweet potato starch, and cornstarch.

For livestock, threatened materials include Furosemide, Parasiticides (Ivermectin and Moxidectin), Poloxalene, Copper Sulfate, and Mineral Oil.

And for crops, more input is sought for Lignin Sulfonate, Vitamins B1, C, and E, Ethylene, and EPA List 4 Inerts of Minimal Concern.

METHIONINE
This was the probably the hottest topic on the agenda. Methionine is a synthetic essential amino acid currently allowed as a part of organic poultry diets, at specific rates expressed in pounds per ton of feed, as
Following extensive public comment, the Board voted to change the current allowance of synthetic to an average rate calculated over the life of the bird. Many organic poultry producers, including several MOSA-certified operators, indicated that synthetic methionine remains necessary for proper nutrition. Certifiers, including MOSA, commented that a lifetime average approach would be enforceable. Several organic consumer groups continued to emphasize a need to phase out synthetic methionine use in favor of natural alternatives, and the NOSB resolved to progress to that. Board discussion focused on balancing commercial poultry production needs, animal welfare, consumer preference, and continued trust in the organic label. The change passed on a split vote, including a parliamentary challenge. In a sad accident on the first day of the meeting, Board member Harold Austin fell and broke his hip. Over some objections, he was allowed to participate in the Methionine vote, from his hospital bed, via Skype.

GLYCERIN
In response to a petition to remove synthetic glycerin from the National List, the NOSB unanimously voted to allow the use of non-organic agricultural (non-synthetic) glycerin in organic products only when organic forms are commercially unavailable. Forthcoming rulemaking will remove synthetic glycerin from the National List. It will be prohibited for organic use. But, non-organic agricultural (non-synthetic) forms of glycerin may be used in natural flavors and in products using the “made with organic…” label.

ANCILLARY SUBSTANCES
Ancillary substances are found in formulated generic handling substances on the National List, do not have a technical or functional effect in the product, and are now proactively considered in NOSB materials reviews. The Handling Subcommittee had voted in to approve several “ancillary substances” found in microorganism products. However, some comments disagreed with this recommendation, and MOSA’s comment noted the proposal was unclear. The proposal was tabled for further work and will likely be back, next year.

GMO CONTAMINATION PREVENTION (DISCUSSION DOCUMENTS)
The NOSB continues to discuss how to keep GMOs out of organic systems. At this meeting, we heard from a panel of seed experts who discussed the current challenges of establishing a seed purity standard. They said more testing and data must be collected per crop type in order to evaluate the feasibility of any standard, especially when establishing a threshold. The Materials Subcommittee may convene a task force or working group to advise on a plan and timeline for collecting the necessary data to inform the next steps. In the meantime, NOSB is urging more stakeholder feedback on the Excluded Methods Terminology and Guidance on GMO Prevention Strategy discussion documents. These had received little comment, and will be back on the NOSB agenda in 2016.

CONTAMINATED FARM INPUT PLAN (REPORT)
A Crops Subcommittee report outlined a path for evaluating each potential contaminant from each potential farm input (fertilizers, compost, manure, etc.), to identify prevention and remediation strategies to help organic farmers avoid contaminated inputs. Comments, like MOSA’s comment, supported the effort but noted it is a complicated issue. The NOSB was encouraged to look to experts to develop appropriate contamination avoidance guidance.

OTHER MEETINGS IN LA JOLLA
The biannual NOSB meetings are also a chance for gathered organic community representatives to meet minds on common concerns. I attended the National Organic Coalition Pre-NOSB Meeting on April 26. This was a good opportunity to discuss issues like recent NOP policy updates, international developments, GMO contamination prevention, organic poultry standards, and biodiversity enhancement.

We also had a chance to meet with two dozen other attendees at a meeting of the Accredited Certifiers Association (ACA). MOSA is an active participant in the ACA. We prioritized topics for certifier working groups, including preparing comments on the Origin of Livestock Proposed Rule, discussed potential NOSB candidates, and talked about a few “down in the weeds” verification challenges for certifiers. The most lively discussion at that ACA meeting concerned actions certifiers and others might take to promote the real, multi-point value of the organic label and certification. We recognized ongoing challenges to the organic label, including misleading and contentious reports in the media, mixed consumer impressions, and competing market claims. We brainstormed solutions, including development of simple tools to educate consumers how “organic IS non-GMO, is antibiotic free, and is pasture-raised”; stacked benefits under one seal.

WORK PLANS AND NEXT MEETING
At the end of the NOSB meeting, we heard subcommittees’ tentative work plans. The fall meeting agenda will largely be dedicated to 2017 Sunset Materials. Also coming down the road are proposals on assessment of soil conservation practices, packaging substances, bacteriophages, and a number of material petitions. You’re encouraged to attend the fall NOSB meeting, in Stowe, Vermont (October 26-29 at the Stoweflake Conference Center). Nearly 200 materials on the National List are scheduled to Sunset in 2017. Your influential input is needed.
LIVESTOCK

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

FARMS/LAND

For Rent: Tillable Farmland for Rent Near Viroqua. 25 acres m/l available for the 2015 season. Eligible for organic certification; must be farmed following organic practices. For the last 6 years, it was in alfalfa. Contact Sarah Mayer at 608-606-2684 or mayer@championagency.com.

EQUIPMENT

Wanted: 40’ KOVAR tined weeder. Please call Pat 651-357-7391 or email TheOsborneFarms@outlook.com if you have one or have something similar.

For Sale: Walk-in cooler. Exterior 14’ 3” by 7’ 10”, with 5 glass doors on one side. Service door on one end. Includes refrigeration equipment. Bought new, used 5 years, stored since. Delivery possible. $900 OBO. 320-632-4691 or cbarnier821@gmail.com.

MISCELLANEOUS


For Sale: Complete State Inspected Certified Organic Poultry Processing Facility available for sale or lease located in Waupaca Wisconsin with a capacity of 500 birds per day. Also available is the Equipment to raise 5000 birds per year; Brooder heaters, heat lamps, nipple drinkers, bell waterers, feeders, movable poultry pens, and poultry netting. Contact John 715-570-2600.

For Sale: Agricultural Grade Local compost. 50 lb. of N, 120 lb. of P, 60 lb. of K per ton plus micronutrients and organic matter. Commercial fertilizer value is over $150 / ton. Price is: $90 / ton. Minimum purchase: 20 tons. Sustane Natural Fertilizer, Inc. (Kenyon, MN) Call Kyle Lilly: 507-263-3003. Email: kylel@sustane.com We can help you develop the most effective nutrient management plans for your crops and soils. ***OMRI certified granular, dry, organic fertilizers also available.


VEGETABLES/TRANSPLANTS/SEEDS


American Organic Seed Dealer: For seed needs, call Rich at 608-485-2756.

FORAGES/GRAINS


For Sale: MOSA Certified Organic Oats. Approximately 600 BU. Elk Mound, WI. 715-879-5572

For Sale: MOSA-certified 2014 square balage: 1st, 2nd, 3rd, 4th wrapped and tested; RFV 135-164; Protein 19-24%. Also 52 seven foot bales of dry hay. Call Charley: 608-638-3860 – Westby, WI.

For Sale: Approximately 800 bales of soon to be certified organic wheat for sale. We are able to haul it to you or you can catch it coming out of the combine. Harvesting the first week in July. Also small squares of straw available from this harvest. Located in West central IL. John 309 333 7149 or 309 833 3893.

For Sale: Organic Wrapped Round Bales. 4X4 Mostly Alfalfa, some grass, individually wrapped round bales. No rain, cut 5/31/15 and baled on 6/2/15. 715-879-5572

For Sale: Organic Shell Corn. Low Test Weight. Tested for vomitoxin, less than 0.5%. Green Bay, WI area. Call Market at 920-591-0875.

For Sale: Certified Organic Alfalfa, First crop cut per bloom. Will be round baled on Saturday 5-23-2015. $175/per ton. dry matter basis. Located in Faribault, MN. Contact: Bryan at 507-838-6347.

For Sale: 110 acres of MOSA certified organic alfalfa. Standing or round bales. garryweber@mwt.net or 608-427-3534. Tomah, WI.

For Sale: Certified – Entire Lot Of 310 Small Square Bales Of ALFALFA/GRASS MIX @ $2.00/BALE. Entire Lot Of 265 Small Square Bales Of ALFALFA. Very Good Quality. @ $4.00/BALE. Contact Dennis 608-221-8180 ext. 13, 608-469-2486 cell, 608-455-1746. dennis@inpaksystems.com. Brooklyn, WI.

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@mogoorganic.com. 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

JULY/AUGUST

Elderflower Power Day and Plant Sale July 4 | 8 a.m.-5 p.m. | Marine on the St. Croix, MN

Hosted by Berry Communications at Natura Farms, learn about elderflowers by participating in our harvest from 8 am – Noon. Enjoy your own picnic lunch on the farm. You will learn about the traditional uses of elderflowers and make some recipes. Elderberry plants will be available for sale plus a seasonal elderflower / elderberry bonus opportunity. To volunteer, pre-register or coordinate group participation, please contact Paul Otten directly: 651-308-3801; pmo@chof.net.

Collaborative CSAs: Some Assembly Required July 6 | 4-7 p.m. | Mount Pleasant, IA

Hosted by Practical Farmers of Iowa, Mogo Farms will talk about the start-up process, the benefits and management of a collaborative CSA, and the roadblocks they’ve encountered along the way. (319) 931-1458; mogoorganic@gmail.com; www.mogoorganic.com.

Organic Farming School: Insect Identification and Management July 11 | 9:30 a.m.-3:30 p.m. | $50 | North Branch, MN

Organized by the Women’s Environmental Institute, this “What Bugs You?” session of the Organic Farming School will be taught by Dr. Loretta Ortiz-Ribbing (MN Dept of Ag). Learn how to identify and monitor farm and garden insects, understand their life cycles, steward beneficials, and organically manage “the unwanted.” Contact WEI: North Branch: 651-583-0705; St Paul: 651-206-7651; Email: wei@w-e-i.org; Website: w-e-i.org.

Organic Farming School: Regenerative Agriculture & Permaculture July 13 | 6-8 p.m. | $20 | Minneapolis, MN

Organized by the Women’s Environmental Institute, this session of the Organic Farming School will be taught by Paula Westmoreland of Ecological Gardens. Contact WEI: North Branch: 651-583-0705; St Paul: 651-206-7651; Email: wei@w-e-i.org; Website: w-e-i.org.

Annual Field Day July 14 | 9 a.m. | Carrington, ND

A tour of the organic research at the North Dakota State University - Carrington Research Extension Center. This tour is held in conjunction with NPSAS. Contact Greg Endres at 701-652-2951 for more information.

Agroforestry Academy July 20-24 | Columbia, MO

A week-long training hosted at University of Missouri Center for Agroforestry that includes integrated classroom workshops, multiple on-farm visits, and content integration into practical on-
MOSA NEWS

COST SHARE UPDATE

The organic cost share application season is now open for many states. Please see our May/June issue of the Cultivator for details on this important reimbursement program for certified organic operations.

For more information or questions, you can contact Lexy McManaway, MOSA Cost Share Coordinator, 608-637-2526.

ADDING NEW LAND:
WHAT YOU SHOULD KNOW

This spring, we asked you to let us know about early-season land additions, such as spring pasture, so that we could meet your timing needs related to inspection and certification. Most people did a great job with this. However, these land additions are so numerous that inspector availability remains a challenge, even when we know of the additions weeks or months in advance. So we’re thinking of more ways we can proactively address our needs. Prior to your annual inspection, think hard about what new fields or pastures you might wish to use later this fall or even early in 2016. If the inspector has the opportunity to verify these land additions at your 2015 annual inspection, and if all applicable documentation is in place, it could save the need for an additional 2015 inspection in the fall, or a rush inspection in 2016.

2015 MOSA PROGRAM MANUAL NOW AVAILABLE

Click or type the link below to download the PDF version of the new 2015 MOSA Program Manual. The revised program manual replaces all previous versions and has the most up to date information that you need to know about organic certification with MOSA.
