



INSIDE THIS ISSUE

THE FARLEY CENTER	1
FROM THE DIRECTOR	1
MOSA CLIENTS PARTNER WITH MOSA'S MATERIALS REVIEW TEAM	4
FINDING HOME: ORGANIC'S 2020 VISION	5
CERTIFICATION POLICY UPDATE	6
ORGANIC CERTIFICATION COST SHARE	11
CLASSIFIEDS	12



FROM THE DIRECTOR

Cori Skolaski, Executive Director

As the seasons change and we head into fall, I hope you have had a healthy and productive summer. This is the time of year at MOSA where we finish initial reviews of updated client paperwork, we are inspecting client operations, and we are starting on final reviews to make certification decisions. This year has been stranger than most, but we're trying - and succeeding pretty darn well - to work as efficiently and normally as possible.

In light of the ongoing coronavirus pandemic, MOSA has made the decision to remain in Stage One of our operating plan. As our priorities continue to be the health and safety of our staff, clients, and communities, Stage One means that our physical office remains closed. Staff will continue

see DIRECTOR on page 3

the ORGANIC Cultivator

VOL. 19 ISSUE 3 FALL 2020

The Farley Center - Peace, Justice and Sustainability

Joe Pedretti, Editor

"I never know quite where to start when it comes to talking about my parents (Gene and Linda Farley). They met while attending the University of Rochester Medical School and got married shortly after graduation. From there, they moved to Denver for a couple of years and practiced medicine in traditionally underserved areas. From Denver, they went to the Many Farms Navajo Nation and for two years lived there providing healthcare to the Navajo. My parents became very aware and cognizant of social justice issues through this early work," said Shedd Farley, Farley Center Director and son of Gene and Linda.

"My parents were both family physicians. Dad developed one of the first three family medicine programs in the US while chairman of the Department of Family Medicine at the University of Rochester. His methodology is still followed by family medicine programs even today. He was always a visionary. Mom was also a family doctor and while maybe not as outspoken as my Father, she was every bit the activist. My earliest memories were of when my grandparents came to babysit us four kids, while Mom and Dad went to Washington D.C. to march with Martin



see FARLEY CENTER on page 2



Luther King. They did things like that for our entire lives.”

“My Dad went from the University of Rochester to the University of Colorado Medical School, and then to the University of Wisconsin. They bought a place in Wisconsin, out near Verona. It was 43 acres at the time. They purchased it from a neighboring farmer who was selling off his non-farmable land in a tough economy. It worked out well for both of them since it was exactly what my parents were looking for. That was 1983, and they then built a house and kept right on going with their activism.”

“Dad was always with the University (WI, CU, University of Rochester) and Mom was always connected with the University, but Mom would always focus on areas in most need of medical care. In Rochester, that was the clinics in inner city and inner city high schools. In Denver she did the same thing. Once they moved to rural Wisconsin she sought out underserved communities. Rural areas are often as underserved as many of the poorest inner city neighborhoods,” noted Shedd.

“After purchasing the land and building the house it quickly became a meeting place for the various organizations they were active with. They came here for retreats and meetings, or just to enjoy the outdoors. We had 25 acres of woods that Dad cut paths into, so he and Mom, and then friends and neighbors, could enjoy walks in the woods. It was always a very active place, both in the house and out on the land. Being doctors not farmers, they also opened up tillable areas of land to local Hmong families to garden for themselves. A large number of Hmong and other immigrants have settled here in Wisconsin and many have farming skills but no resources to farm.

All the while they continued to actively support issues that they believed in. As physicians, that included affordable healthcare, but also environmental causes as well.”

“In 2009, at the age of 80, my Mother died and had wanted to donate her body to science but, as commonly happens, science didn’t want her and we didn’t have a plan B. So we sat down with Dad and we decided upon a green burial right here on their own property. We applied for and got permission to

bury my Mom on the land with a few phone calls. Family and friends came out and we dug the grave, lowered my Mom into the grave, and covered the grave. For our family and friends it was an amazing way to say goodbye. The catch was that you could have one burial on a piece of rural property, but to have two burials you needed to be certified and licensed as a cemetery. Dad was never a small thinker, so he decided to certify all 25 non-tillable acres of the property as a cemetery. He immediately began developing and planning that, while simultaneously creating The Linda and Gene Farley Center for Peace, Justice and Sustainability.”

“We then became two organizations: The Farley Center and The Natural Paths Sanctuary and Green Cemetery. They are very tightly connected with the same ideology and mission goals, but separated legally. The Farley Center is a 501(c)(3) charitable nonprofit, and the cemetery is a 501(c)(13) nonprofit. It was about a two and a half year project, from conception to reality even with the help of a lot of other people who believed in what my parents believed in.”



“The concept of a green cemetery is easy. We don’t use any chemicals, plastics or extensive landscaping like a conventional cemetery does. All the paths that my Dad cut into the woods are now the basis for the cemetery. When we created the Farley Center, one of the first things we did was apply for a USDA grant for farm incubators. The concept was that we would bring in beginning farmers with a focus on immigrant and underresourced people who want to farm. This was building upon the work we had done with the Hmong farmers who were already here. We would bring in new farmers, train them in organic farming, and provide them the necessary resources: the land, the equipment, and the infrastructure including packing sheds, and everything else they needed. Because we had the grant, we charged nothing to the farmers. My Dad already had a lot of equipment and we built more infrastructure with the grant.”

“During this process of working with the USDA my Dad decided that he did not want to continue

to work from home until April 1, 2021, at which time we will reevaluate the situation and move forward with current information. There are a handful of critical workers at MOSA who need access to our office and for whom we have made necessary and safe accommodations, but we are closed to the public and to walk-in clients.

I'm happy to tell you that our office closure since mid-March has gone extremely well for us. From client feedback we've heard, this has not impacted our customer service at all - staff are still available by phone and email as usual, and most of the time, it's not even apparent that we are not in our office. MOSA folks are a friendly and collegial group, so we do miss seeing each other - the day-to-day personal contact, potluck lunches, and water-cooler conversations, but this is the state of the world right now and we're adjusting just like everyone else.

The area of our operations that has been most impacted is the way in which we are conducting inspections. Several of our contract inspectors have either temporarily stepped out of the inspection business or retired because of their health concerns, which is a loss not only to MOSA, but to the entire organic industry. As I reported in the last newsletter, the National Organic Program is not waiving requirements for certifiers to perform residue tests, unannounced inspections, or in-person inspections of new operations, but they are allowing us to be innovative in the way in which we conduct annual inspections for current clients. The NOP has allowed certifiers to develop new ways to perform inspections - in-person, virtual, a hybrid of the two, and in a very few select situations, we are allowing desk audits. MOSA continues to be committed to maintaining the highest standards of quality and integrity.

For in-person inspections, we are asking that participants follow CDC guidelines: wear a mask, social distance, limit the number of people at the inspection (ideally, two - the inspector and one site representative), conduct as much of the inspection outside as possible, etc. If you have any questions, concerns, or safety requirements, please let your inspector know prior to your inspection.

This summer has been especially difficult, with a global pandemic, concerns about the economy and job security, upcoming presidential elections with increasing intolerance and divisiveness, and large-scale social unrest. In response to the murder of George Floyd in May and the on-going violence against people of color in this country, MOSA staff have been self-educating and training ourselves to work against systemic racism in our own lives, organization, community, and culture. Kassie Brown, a MOSA Certification Specialist, has organized a lunch-and-learn series for staff. We have been taking part in Brexley High School's 21 Day Anti-Racism Challenge to broaden our awareness and begin to share a language around racism and systems of oppression. We tailored the challenge for our workplace and have made it a 21-week challenge with brown bag lunches every Thursday. We kicked off the discussions by watching a video

of Leah Penniman from Soul Fire Farm's inspiring and moving keynote address at MOSES' 2020 Organic Farm Conference.

"To be 'anti-racist' in our society means deliberately paddling upstream against a current of deeply ingrained thought, policy, and perspective. Many of us have been enjoying the float downstream, particularly because we unknowingly benefit from the racist systems that keep others oppressed. Choosing to paddle the other way is hard. So here at MOSA, we are continuing to learn so that someday we can turn this boat around. We want to be and do better so that someday all people really will be equal, and generations of us won't have to fight so hard for life, liberty, and happiness", said Kassie. If you would like any information on what we're reading, watching, or discussing, let me know - I'd be happy to share it with you; my contact information is below.

MOSA's Statement on Racial Justice and a Path Towards Healing, July 2020

MOSA believes that organic offers viable solutions to urgent global challenges and that a thriving organic world must have balance: socio-economic justice, ecological sustainability, and the interdependent well-being of individuals, communities, and ecosystems.

We acknowledge that systemic discrimination exists within our farming and food production systems today. Our current systems and power structure continue to marginalize people of color. We must learn from, and work towards solutions that address these injustices.

MOSA is working to identify and dismantle the impact of systemic racism within our own organization, and the organic agriculture industry as a whole. We will use our voice and influence to encourage others to work towards equity and socio-economic justice for all, and we will start with our own deep introspection and commitment to change.

Acknowledging that we are part of the problem is an uncomfortable truth. Discomfort, however, can be a powerful catalyst for change. We welcome this opportunity to evolve and we are prioritizing equality and diversity in our mission, our organizational structure, our policies, and our developmental strategies. We are committed to being a positive force for change, and we will do our part to help build a path towards healing.

I sincerely hope you and yours are staying healthy. The Coronavirus crisis is going to change the way we do all things for a long time. That is now clear. But it is still our world and it is up to us to make the best of whatever comes our way; we're in this together. 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 or 608-637-2526. Thank you for reading, and thanks for your continued commitment to organic integrity. Be well. ■

MOSA CLIENTS PARTNER WITH MOSA'S MATERIALS REVIEW TEAM

Mark Geistlinger, Customer Service Team Lead

“Is this input allowed for use in my organic operation?” is the top question that MOSA’s clients ask our Customer Service-Materials Review Team, and for great reasons: choosing the best inputs for one’s organic operation can mean the difference between success and failure for a particular organic product or even entire business, and use of even a small amount of prohibited material can make a product uncertifiable as organic. Because of the tremendous importance of input reviews to our clients’ organic operations and to their organic certifications, MOSA has committed significant resources to developing an excellent material review program as a core offering to our clients within our organic certification service. Like the other aspects of organic certification, though, MOSA’s materials review program works best when embraced as a partnership between MOSA staff and clients, so let’s discuss some ways to strengthen that partnership!

MOSA: staff + technology + procedures

Over the last two years, MOSA has assembled and trained staff to focus exclusively on our clients’ certification questions and input review requests: the Customer Service-Material Review Team. I joined, and then tried to imitate, longstanding organic farmer-inspector Robert Caldwell on the Team two years ago. We lost beloved Robert to a well-deserved retirement last spring, but have gained two impressive members in Terri Okrasinski and Andrea Holm, who were both seasoned Organic Inspector-Reviewers in MOSA’s Certification Department. Our team is led by MOSA Client Relations Director Joe Pedretti, while MOSA Certification Policy Manager Jackie DeMinter directs our team’s material review efforts. Finally, some material reviews are completed by MOSA’s Certification Specialists, who primarily focus on Initial and Final Reviews for MOSA clients.

MOSA has also invested in technology to strengthen and streamline our material review process, building and implementing over the past two years a new materials database within the Knack cloud-based software system. This new database has enabled MOSA to capture and re-use more precise information about the inputs our clients use, allowing us to build an individualized, secure, and confidential Input Inventory for each client within the database. With this connection, MOSA can better avoid repeated requests to clients for input use information, readily inform clients of changes to inputs, and determine organic compliance of inputs more efficiently. MOSA IT Analyst Ryan Hunt adroitly tinkers with the Knack database when needed.

While the fancy new database may have streamlined some of our material review work, our procedures still allow a host of ways for clients to communicate with MOSA staff regarding inputs for their organic operations. One or two of us on the Customer Service-Materials Review Team is available during MOSA’s open hours to answer phone calls, emails, and paper letters about inputs and other certification topics. Additionally, MOSA clients are asked on their Annual Update form each spring if they have any new inputs to propose for use that year, and clients are asked at Inspection to review and revise their current Input Inventory (printed from the new Knack database) as necessary.

MOSA clients: ask + consider + wait

Whichever way MOSA clients choose to contact MOSA, they strengthen our material review partnership when they ask about the acceptability of an input well in advance of the date they want to use it in their operation. Clients should include three pieces of information about their requested input when they contact MOSA:

1. The product’s exact name
2. The brand/manufacturer
3. The intended use

MOSA staff will then use this specific information to search in our Knack database to determine if we have reviewed the input for the intended use. If MOSA has not reviewed the input, our Customer Service Team will then look in the inputs databases of the three independent input review agencies approved by the National Organic Program: OMRI, WSDA, and CDFA (fertilizers only). If MOSA or one of the three approved agencies has reviewed and approved it for the requested use, then hooray!—it will likely also be approved for the current client’s use, provided they meet any restriction that’s part of the input’s review status.

FINDING HOME: ORGANIC'S 2020 VISION

Stephen Walker, Accreditation and Industry Affairs Manager

A few weeks ago I had some dreams with themes of being lost in some sort of transportation system, surrounded by unfamiliar people and culture, and unable to find my way home. Back when I could remember the details better (we forget these quickly), I described one dream to MOSA colleagues, and Cori said, "That's a Covid dream!" Yep. Between the pandemic, climate crisis, inequity, and financial uncertainty, rest is disturbed for many conscientious people as we've negotiated 2020. Lately, we've heard so much about "new normal" that I rather object to the term. It smacks of pessimism. On the other hand, many folks are seeing how so many of our systems are out of balance and not working, and they're seeking a better place akin to our optimistic movement and values statement, "Organic offers viable solutions to urgent global challenges. A thriving organic world must have balance: socio-economic justice, ecological sustainability, and the interdependent well-being of individuals, communities, and ecosystems." We want to get to a more comfortable and safe place. The good life, a better place, has been at the heart of our global organic movement for over 100 years.

For most of 2020, while recognizing deep value in a strong local community, our wider organic movement has taken much of its interdependency to online connections like webinars and video meetings. As the world awakes to changes we all must make, there are opportunities and global urgency for our movement's missions, principles and values.

EU Green New Deal

In an encouraging example for the rest of us, the European Commission has proposed a target to increase organic farming in the EU to 25% by 2030, in their just published [Farm to Fork \(F2F\) strategy](#) and [Biodiversity strategy](#).

Jan Plagge, [IFOAM EU President](#), stated: "(This) is a landmark decision that puts organic farming at the core of a transition of European agriculture towards agroecology. Organic farming is a successful economic model for farmers with proven benefits for the environment. Making it a cornerstone of a future EU sustainable food system is the right decision." He continued: "We need to transform EU agriculture if we want to address the climate and biodiversity crisis and make our farming systems more resilient. The F2F strategy provides a clear vision for the future of our food system." Plagge called for necessary policy reform to reward farmers for their contribution such as the preservation of our natural resources. And he warned, "We must not make the mistake of using Covid-19 as an excuse to continue a backward looking agricultural policy."

Here in the US, the Organic Trade Association fea-

tured a webinar on discussing the EU's Green Deal. The recorded webinar is [available for OTA members after registration](#).

Optimistic research

Science explains why organic is a good choice for our planet, and more studies are published each week. The Organic Center summarizes the latest peer-reviewed studies at its research blog: <https://www.organic-center.org/research>. Recently published summaries show: green manure reduces weeds while improving soil fertility in organic rotations; production of organic cotton is more profitable and less risky than GM cotton; more antibiotic-resistant E. coli is found in conventional and antibiotic-free chicken meat than organic; and, levels of glyphosate (aka Roundup) in families drop dramatically after one week of eating organic.

The Organic Center also recently shared a study from Thailand. While many countries are implementing programs to expand organic farming, it's important to understand why farmers are willing to adopt organic practices. A recent study in the [Journal of Agricultural Extension](#) showed that environmental concerns were the top incentive for switching to organic for Thai rice farmers. The Thai government has been actively encouraging farmers to transition to organic production since 2018, and Thailand's organic industry is growing by 16% annually. Those who were most willing to adopt organic were farmers with more years of schooling, of younger age, with smaller pieces of land, and had more experience in farming rice.

Climate action in US

An August 27th OTA webinar focused on U.S. Climate Policy & Organic Agriculture. The Organic Center presented an easy-to-understand scientific grounding in the connections between organic practices, increases in soil carbon, and reductions in nitrogen pollution. OTA Board Members then shared the latest policy recommendations to support organic as a key to mitigating climate change. Panelists discussed U.S. Congressional legislation prioritizing agricultural solutions, and a new report from the U.S. House Select Committee on the Climate Crisis. [This webinar recording is also available](#).

[OTA's website](#) includes good support for organic's battle on climate change. A new white paper offers specific recommendations for Federal policymakers to support organic farmers and encourage transition to organic farming as a key strategy for mitigating climate change, which threatens our communities, economies and ecosystems. Policy recommendations in the white paper include:

- Elevating organic as a key voice in climate-smart

CERTIFICATION POLICY UPDATE

by Jackie DeMinter, Certification Policy Manager

Strengthening Organic Enforcement Proposed Rule

The public comment period closes soon for USDA “Strengthening Organic Enforcement” Proposed Rule. Comments will be accepted through October 5, 2020. Consider commenting if you have not yet done so! All comments received are publicly available on [regulations.gov](https://www.regulations.gov)

The USDA is proposing to amend the USDA organic regulations to strengthen the oversight and enforcement of the production, handling, and sale of organic agricultural products. The proposed amendments are intended to protect integrity in the organic supply chain and build consumer and industry trust in the USDA organic label by strengthening organic control systems, improving farm to market traceability, and providing robust enforcement of the USDA organic regulations. This action applies to all stakeholders in the organic industry, and will likely affect operations that are brokers, traders, importers, exporters, private labeling companies, retailers, and operations using nonretail containers, and will also impact all certifiers, inspectors, and foreign organic programs. This proposed regulation is the most significant to be published since the implementation of the National Organic Standards in 2002.

Topics addressed in this proposed rule include: applicability of the regulations and exemptions from organic certification; National Organic Program Import Certificates; recordkeeping and product traceability; certifying agent personnel qualifications and training; standardized certificates of organic operation; unannounced on-site inspections of certified operations; oversight of certification activities; foreign conformity assessment systems; certification of grower group operations; labeling of nonretail containers; annual update requirements for certified operations; compliance and appeals processes; and calculating organic content of multi-ingredient products. The proposed amendments would amend many sections of the USDA organic regulations to close gaps in the current regulation to build consistent certification practices to deter and detect organic fraud, and improve transparency and product traceability.

Once finalized, for clients and certifiers the revised regulations will:

- reduce the number of uncertified businesses in the organic supply chain, including importers, brokers, and traders of organic products through revisions to exemptions and exclusions from organic certification.
- standardize organic certificates by requiring certifiers to use the USDA’s Organic Integrity Database to generate certificates.
- require the use of import certificates for all imported organic products.
- increase the minimum number of unannounced inspections, and require full supply chain audits.
- require certifiers to communicate with each other regarding operation compliance.
- increase inspector and reviewer qualification requirements.
- strengthen fraud prevention procedures through improved recordkeeping, prevention strategies, and trace-back audits.
- create nonretail labeling transparency.
- set requirements for grower groups.
- increase certifier data reporting requirements to make it easier to identify and focus enforcement resources on higher-risk locations, activities, and commodities.

In addition to the impacts to clients and certifiers, the NOP will be required to implement a system for assessment of organic equivalence with foreign organic programs.

The proposed rule also includes a request for comments on a few provisions that were not included in the rule, but are being considered. These provisions include the requirement that all certificates bear an expiration date, which would not impact the operation’s organic certification. Operations would still be certi-

fied unless they surrender, or are suspended or revoked. The expiration date would be relevant to the certificate only. Provisions being considered additionally include questions about packaged product labeling, and private labeling, including which operation name should be listed on the label, which certifying agent should be identified, whether listing contract manufacturers should be mandatory or optional, and the terminology necessary for private labeled organic products and the operations producing such products.

For more information, please see the [AMS Strengthening Organic Enforcement](#) webpage. Comments must be submitted through www.regulations.gov and will be considered by AMS as the final rule is developed. All comments received must include the docket number AMS-NOP-17-0065; NOP-17-02, and/or Regulatory Information Number (RIN) 0581-AD09 for this rulemaking. You should clearly indicate the topic and section number of this proposed rule to which your comment refers, state your position(s), offer any recommended language change(s), and include relevant information and data to support your position(s) (e.g., scientific, environmental, manufacturing, industry, or industry impact information, etc.).

Should this rule become final, the implementation period will be a year. Comments should also include details on whether operations can comply with this timeframe. The AMS is also requesting comments from certifiers regarding the cost of additional actions required. While MOSA is generally in support of the proposed rule, we recognize the implementation of it may increase the complexity and/or cost of organic certification. MOSA's comments to the NOP will contain our thoughts on minimizing the potential impacts including emphasizing the need for expanded cost share funding.

Origin of Livestock (OOL) Proposed Rule

The USDA missed the congressional deadline to finalize the origin of livestock proposed rule. The rule is under evaluation again due to complexities that arose surrounding rule legality and industry goals. The NOP has not given a deadline for when the rule is expected to be published.

As a reminder, the [proposed rule](#) published on April 28, 2015 would eliminate the allowance for some operations to transition multiple groups of animals. MOSA's policies align with the intention to allow one transition per farm. The rule would require that transition be conducted over a single year, and all animals would be required to transition at the same time. Third year transitional feed only would be allowed during transition for the entire herd, including youngstock. The rule reinforces that transitioned organic animals can be transferred between operations, and in addition the rule would allow for organic animals to be purchased during transition. Operations allowed to conduct a transition would be required to be a dairy farm, milking animals. Finally, the rule would clarify that fiber bearing animals must be organic from the last third of gestation for the fiber to be considered organic.

National Organic Program Organic Integrity Learning Center

Updates made to the [Organic Integrity Learning Center \(OILC\)](#) offer expanded features including the generation of course completion certificates and transcript printing. Completed courses are moved to a read only archived section of the learning center. This resource was developed by the NOP to provide free on-line training to support the professional development of organic professionals working to protect organic integrity. If you have an Account: Access the Learning Center. If you need a Free Account: Read "Getting Started" and sign up at: www.ams.usda.gov/services/organic-certification/training. For questions about the Learning Center, contact USDA-NOP@apvit.com.

New courses and course descriptions recently announced as available in the learning center include:

NOP-100: Organic Fraud and the Criminal Mind

Fraud anywhere in the organic system hurts organic farmers. Taught by an expert in food fraud, this course focuses on how the criminal mind works, so you can help deter fraud in the global organic supply chain. This course:

- Shares insights into the criminal mind.
- Describes the product fraud concept and the role of vulnerability assessments.
- Breaks down the factors that can indicate fraud vulnerability.
- Identifies opportunities for organic fraud and explains how to focus on these opportunities during the

agricultural policy;

- Establishing a national program to support transitioning organic farmers by reducing financial risks, improving market infrastructure development and increasing access to land;
- Developing a competitive grant program to provide technical services to organic and transitioning farmers to create better access to information about organic production methods that sequester greenhouse gases and improve crop yields, and
- Creating a federal Healthy Soils pilot program, based on USDA's Natural Resources Conservation Service and the California Healthy Soils Initiative programs.

Fall NOSB meeting

As we consider our organic movement impact in this world in crises, we continue work to improve our Standards. You can tune in to the deliberation in October as the National Organic Standards Board (NOSB) Meeting will be held live online. We'll miss the in-person collaboration, but appreciate that the online format enables more organic stakeholders to participate, safely. Full meeting details are at the [NOSB Fall 2020 Meeting webpage](#). Consider registering (by 10/1) to present public comment or provide written feedback on agenda items. Public comments will be heard on October 20th and 22nd, and the Board will consider agenda items from October 28th-30th. Here's a brief agenda summary.

From the NOSB Crops Subcommittee:

1. A proposal would add *Paper (Plant pots and other crop production aids)* to the National List. This would define a paper-based crop planting aid as "A material comprised of at least 60% cellulose-based fiber by weight, including, but not limited to, pots, seed tape, and collars that are placed in or on the soil and later incorporated into the soil. Contains no less than 80% biobased content as verified by a qualified third party assessment."
2. A proposal seeks to limit the impact of harvesting wild, native *fish for fertilizer* and to ensure that liquid fish fertilizer products are not harmful to the environment. This restricts liquid fish products to those sourced only from fish waste, bycatch, or invasive species.
3. A proposal would add *Sodium carbonate lignin* to the National List at 205.601(j)(4)
4. All subcommittee recommendations support continued allowance of 2022 *sunset substances*, with the exception of *Aquatic plant extracts*, and EPA List 4 - *Inerts* of minimal concern. For aquatic plant extracts, the subcommittee was divided. Two members wanted more information on marine macroalgae in plant fertility products (described below) and one member was concerned about the environmental impact of harvests. For inerts, EPA List 4 is outdated and may include materials inappropriate for organic. The Crops Subcommittee strongly requests that the NOP act on a 2015 NOSB recommendation, since the NOSB, NOP, and EPA now have tools to work together, including the established EPA Safer Choice Program.
5. Two *discussion documents* include a petition seeking to prohibit nonsynthetic ammonia extracts for use in organic crop production, and more discussion on Biodegradable biobased mulch (annotation change).

From the Livestock Subcommittee:

1. The fenbendazole allowance is proposed to include: Fenbendazole-for use in laying hens or replacement chickens intended to be laying hens.
2. The subcommittee recommended that all 2022 Sunset substances should continue to be allowed for use.

From the Handling Subcommittee:

1. A proposal seeks to add *Low-acyl gellan gum* as an allowed substance on the National List.
2. For *ion exchange filtration*, to correct inconsistency in certifier reviews, the subcommittee recommends the recharge materials, but not the resins or membranes themselves, must be reviewed and included on the National List.
3. A number of 2022 Sunset substances are NOT recommended for continued allowance. The Subcommittee vote on *carnauba wax* was split based on concerns about the use of volatiles in its production, possible availability of organic forms, and concern with an unlabeled ingredient/additive used on produce. For 18 colors currently allowed, almost all subcommittee votes were split. In 2015, the NOSB noted the emerging certified organic colors and recommended future review of each color individually rather than lumping them as a group. Persons interested in maintaining a particular color's allowance should speak up, or

the NOSB will assume the color no longer needs to be listed. The Subcommittee was split over relisting *orange shellac*. There is lack of information about whether its use in organic products is widespread or necessary as well as an absence of comments on this ingredient. The Subcommittee also recommends removal of *cornstarch*, *sweet potato starch*, and *Turkish bay leaves* because of the presence of organic sources for these.

4. Whey protein concentrate is also petitioned for removal from the National List. There's been no public comment indicating inadequate organic supply. In fact, some say that at this point the supply exceeds the demand.

A **NOSB Materials Subcommittee** proposal on *Marine Macroalgae in Crop Fertility Inputs* provides parameters on harvesting addressing conservation areas, bottom trawling, protecting reproduction of the population and ecosystem functions, biomass and architecture, and bycatch.

And, the **Compliance, Accreditation, & Certification Subcommittee** will wrestle with a discussion document on our critical challenge of "*Human Capital Management*" for Organic Inspectors and Reviewers, after a July [memo](#) from the NOP. Organic certifiers, including MOSA, and organic farms and businesses, have raised the problem of a known shortage in organic inspectors and reviewers. This comes from a rapidly expanding industry, the need for specialized skills, and competition for well-qualified individuals both inside the organic community and with other industries. With the increasing size and complexity of organic supply chains, developing, recruiting, and retaining well-trained and well qualified inspectors and reviewers is essential for organic integrity. Got skills? Consider jumping into our line of work.

In our many comments to USDA on the organic regulatory process, we've often noted this human capacity challenge. We support strengthened standards, to regulate a growing industry and to correct gaps, but we're conflicted when these improvements so often place more burden on certifiers. The proposed rule for Strengthening Organic Enforcement (see Jackie's article in this newsletter) continues more of the same regulatory scheme which IFOAM describes as "Organic 2.0," a phase of organic development started in the 1970s when the writings and agricultural systems developed by our pioneers were first codified into standards and later into legally-mandated regulatory systems. Though proposed SOE changes are well-targeted, we have some concern about capacity challenges, costs, and whether the strengthening makes certification less widely accessible. IFOAM's [Organic 3.0](#) concept paper considers new "Diverse Ways to Ensure Transparency and Integrity." This foresees that "*different, new verification schemes may become practiced depending on the length and complexity of value chains. Reputation economy and web-based communication technology offer new opportunities; the organic movement must be open to this. For long chains, the process-oriented paperwork might be complemented and reduced by modern authentication, tracing and tracking technologies, which will become widely used as they become more affordable (e.g. remote sensing, highly improved analytics). Third-party certification will remain important particularly for marketing in large quantities in retail chains. The Organic 3.0 model in this case must entail reforms to lower the burden of producers for onerous reporting requirements.*"

Sometimes, our burdensome regulatory process gets in the way of getting back home even when there's wide support for changes.

OLPP dead again

As of this writing, we've just learned that the Organic Livestock and Poultry Practices (OLPP) rule, which aimed to strengthen animal welfare requirements, is dead. The OLPP proposed rule was published in January, 2017, with most work completed under the Obama Administration, then stalled under the current administration and was withdrawn in March, 2018. The Withdrawal rule noted errors in cost/benefit assessment, and projected that OLPP rule costs likely exceeded benefits. The Agricultural Marketing Service (AMS) also concluded there was no organic market failure sufficient to warrant the OLPP regulations, and said the Organic Foods Production Act did not permit regulating organic solely on animal welfare concerns. Last October, OTA filed a motion for summary judgment, including a private economic analysis. In reviewing the private economist's work, AMS found additional OLPP flaws. In January, USDA requested time to clarify. Dr. Peyton Ferrier produced an Economic Analysis Report concluding that there were significant methodological flaws in the rules' Regulatory Impact Analyses, and his economic analysis report findings were opened for more public comment.

After reviewing 551 public comments, including MOSA's input, AMS says the OLPP rule should stay withdrawn. Many commenters addressed matters which favored the OLPP rule, but were unrelated to the Economic Analysis Report specifics. One commenter stated that USDA failed to give enough time for review and comment. However, a longer comment period would not have allowed completing the Final Decision by the deadline, and it was opined that since the OLPP Regulatory Impact Analysis was available since 2017, stakeholders had ample opportunity to familiarize themselves with the noted flaws.

If the requested input has not yet been reviewed and approved, though, the MOSA Customer Service Team member will ask the MOSA client to consider using a similar input that has already been reviewed and approved for the same use. We'll search for these inputs within the approved databases and happily provide lists for clients by phone, email, or postal mail.

If the client does want to have the requested input reviewed for their intended use, then the MOSA Customer Service-Material Review Team member will ask the client to wait to use the input while we start the full material review process by entering the input into our Knack database and attaching the requesting client's name to it, so we know whom to contact when the review is complete. The request will then be put in the "review queue", to be reviewed in the order received. MOSA will contact the manufacturer directly on behalf of our client, since most manufacturers will not release ingredient information directly to their customers. Since the request may not come up for review for a few weeks, and may take several days or weeks to review with the manufacturer (depending on the complexity of the review and/or the engagement of the manufacturer), we strongly suggest that clients make their input requests a few months prior to the date they hope to use the input.

MOSA + clients = a successful organic partnership

With the tremendous growth of the organic foods movement, the number of inputs developed for this expanded market of organic producers has also increased dramatically. The good news is that many of these materials can enhance the quality, productivity, and efficiency of MOSA clients' organic operations. The challenge for MOSA and our clients is to review the host of new materials in a timely and cost-effective manner. During our shared history, MOSA and our clients have repeatedly turned challenges such as this into opportunities to strengthen our partnership by leaning into it with generosity, understanding, and dedication.

Comments, questions, or an input review to request? Contact your MOSA Customer Service-Material Review Team, since the only thing we enjoy more than reviewing inputs for our MOSA clients is talking directly with them! ■

Call for MOSA Board Nominations

MOSA seeks new board members! Do you know someone who is committed to the organic industry and would like to serve on the MOSA board? The MOSA Board of Directors helps guide policy and financial direction for our non-profit certification agency. MOSA particularly needs board members with strong organic farming, retail, legal, and/or financial backgrounds. Board members commit to a three year term with regular phone/video call meetings and a few in-person gatherings (if possible) each year.

According to the National Organic Program rules, a Director cannot be a current MOSA client, but can be certified with other agencies. We will vote for new directors in February, and the term will begin in March 2021. Please call Cori Skolaski, Executive Director, at 608-637-2526 or email cskolaski@mosaorganic.org for more information.

Organic Certification Cost Share

Help with Organic Certification Costs

The Organic Certification Cost Share Program (OCCSP) is up and running for the 2020 program year. Certified operations applying for organic cost share can expect 50% up to \$500 for each category or “scope” of certification (crop, livestock, wild crop, handling). Anticipating a significant increase in cost share applications this year, the FSA revised the maximum rebate from the standard 75% up to \$750 to the lesser amount. For more information or if you have questions or concerns about the reduction, visit <https://mosaorganic.org/education-resources/certification-cost-share> or contact MOSA.

Actively certified organic operations are eligible for organic cost share.

ORGANIC COST SHARE BASICS

Application Deadline

FSA deadline: October 31, 2020.

State deadlines vary.

Rebates are issued first-come, first-serve.

Who is Eligible

Certified organic operations who have paid organic certification fees and costs between 10/1/2019 and 9/30/2020.

Eligible Costs: Certification (application) fees, inspection costs, fees related to equivalency agreement/arrangement requirements, travel/per diem for inspectors, user fees, sales assessments, and postage

Ineligible Costs: Equipment, materials, supplies, late fees, transitional certification inspections, and inspections necessary to address NOP regulatory violations.

How to Apply

Contact your local FSA office or your state department of agriculture for an application. To locate your FSA county office, use this link [FSA County Office Locator](#) or contact MOSA.

Some states also offer the program. The list of participating states is not yet finalized. Last year California, Missouri, New Jersey, New York, Minnesota, Ohio, Pennsylvania, South Dakota, and Wisconsin participated in the program. To find out if your state will be participating in OCCSP, contact your state department of agriculture or visit www.fsa.usda.gov/organic.

How does MOSA help?

MOSA provides payment documentation and verifies organic certification status. We're also happy to answer your questions or concerns about the application process. When you're ready to apply, contact MOSA and request your payment documentation. MOSA does not complete, accept, or process cost share applications.

For more information or questions:

Contact your local FSA office, your state agricultural department, or Lexy McManaway, MOSA Cost Share Coordinator, 608-572-7276.

Helpful Links:

USDA/FSA OCCSP Fact Sheet

https://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdafiles/FactSheets/organic_certification_cost_share_program-fact_sheet.pdf

Notice of Funds Availability – this site explains the reduction

<https://www.federalregister.gov/documents/2020/08/10/2020-17385/notice-of-funds-availability-nofa-for-the-organic-certification-cost-share-program>

FSA County Office Locator

<https://offices.sc.egov.usda.gov/locator/app>

MOSA's Website

<https://mosaorganic.org/education-resources/certification-cost-share>

CLASSIFIEDS

LIVESTOCK

MOSA CERTIFIED CROSSBRED DAIRY CATTLE

MOSA Organic Certified crossbred dairy cattle. Dry cows and heifers ages range from 3yrs to 10yrs. Majority are short-horn cross. Very calm herd. The cows are confirmed bred and to calve within the next couple weeks. Heifers have been calving throughout the summer. Located Dubuque, Iowa. (563)451-8061

CERTIFIED ORGANIC DAIRY HERD

MOSA certified organic dairy herd for sale in all lactations. All shorthorn, holstein, Jersey and ayrshire crosses. Located Dubuque, IA. Please call leave voicemail (563) 451-8061.

FEDERALLY INSPECTED MEAT SLAUGHTER & PROCESSING FACILITY

We are your one stop shop for all of your slaughter and meat processing needs. Federally inspected. For help with your labels call Kay at 405-434-8826 or contact Elmer Beechy at N3825 C.R P, Elroy, WI 53929

CRESCENT MEATS

USDA INSPECTED-CERTIFIED ORGANIC FAMILY OWNED for 15 YEARS FULL SERVICE SLAUGHTER FACILITY 15332 State Highway 27 Cadott, WI 54727 Phone: 715.289.3000 crescentqualitymeats.com

PREMIER LIVESTOCK & AUCTIONS-NOW CERTIFIED ORGANIC!

Premier Livestock & Auctions is now the only certified organic livestock auction barn in the Midwest. Sell your certified organic cattle and feed. N13538 State Hwy 73, Withee, WI 54498. 715-229-2500.

EQUIPMENT

LARGE LOT OF EQUIPMENT: USED 100% IN ORGANIC FIELDS- CULTIVATORS, TANKS & MORE

Call for pictures of all equipment. 4-100 gal.liq. tanks with air agitation, top drive piston pump in furrow thru Keeton on 31 rows Agexcel non orifice tubing, second top drive twin piston pump for 2" N placement on 31 rows Agexcel non orifice tubing, RID gauge wheels, one rubber press wheel and one curve tine Dawn with triangle scraper, 15 Dawn 2003 narrow row cleaners push rows throwing out, 16 Dawn frame mounted Liquid fert opener and row cleaner throwing out, markers, 1/2 width JD hydraulic drives or 1/2 width Rawson drives, mechanical drive currently

unhooked, rear hitch and 2" hookup, lid hinges on all rows, kinze brush meters 32, Precision Planting(PP) 6 finger pickup 32, PP 12 finger pickup 32, PP air force lift 31 rows spring down pressure, PP wave vision and DJ seed tubes, PP Gen 1 20/20 monitor., PP rowflow control, PP hyd air compressor, 3 new HD transport tires. Kinze switchbox for folding to narrow transport. \$25,900 USD or best offer.

John Deere 845 16 row 30" 40' toolbar with Wilrich heavy duty tines. Option orbee shields for each row. Parking stands equipped. Nice. \$5,000

International 183 12 row 30" with tender foot L knives. \$3,000

Alloway 8 row 30" x 2. \$2,500/each

Buffalo 4630 8 row 30" no till cultivator with shields, ridging wings and liquid behind barring off discs. \$5,900

B & H Danish tine cultivator with rolling shields 16 row 30" . \$3,900

Krause Dominator 4800-20. 7 larger parabolic spring loaded ripping shanks with one piece cast points. Hydraulic counters and hydraulic leveling disks and baskets. \$22,500

Belt tube type conveyor on transport wheels with 3 phase electric motors. x 2. \$1,000/Each

Fast 5000 pull between 1600 gallon liquid tank with hydraulic ace pump with 3 motorized ball valves for section control (ag leader harness). Sheded. \$14,000

2 axle 500 gallon tank. \$500

John Deere 10' 3pt cultapacker with hydraulic adjust teeth and coil tines. \$850

Contact Mark at 608.490.0925 or mark.r.doudlah@gmail.com. Evansville, WI

HORSE DRIVEN IMPLEMENTS

New I&J Manufacturing cover crop roller & horse driven implements. Organic Roots Way is a dealer located in Camp Douglas WI. Contact Joel for info and pricing shipped directly to your address. 608-427-3423.

ROLLER CRIMPERS

Organic Roots Way is a dealer located in Camp Douglas, WI. Contact Joel @ joel@rollercrimpers.com or call 608-424-5577 for information and pricing shipped directly to your address. See <https://rollercrimpers.com/>

MISCELLANEOUS

DREAMING OF RECOVERY HOUSING FOR WOMEN ON A WI FARM?

We have an organic farm in Southern WI and are interested in exploring with others the possibility of creating recovery housing for women (and perhaps children) on our farm. If you are a person who has a passion for women in recovery and agriculture AND have some skills and energy to bring to such an endeavor. Please contact Julie at jschwabop1@gmail.com.

RED WORMS & CASTINGS

10 lbs of red worms available for sale after the 4th of July. Also have several tons of worm castings. Richland Center, WI location. Dan Corbin-owner. Wisconsin Worm Farm. www.wisconsinredworms.com, 1-608-647-2008. or 608-475-2624

FORAGES/GRAINS CERTIFIED ORGANIC HAY

2020 test are back on 3x3x8' organic hay all ranging 160-176 rfv 20 protein from North Dakota. We have certification papers available. For info email hay4you@gmail.com or call 715-503-4730.

CERTIFIED ORGANIC HAY & STRAW

Dry and silage bales; 1st, 2nd, and 3rd crops. Delivery available. Sno Pac Farms, Caledonia, MN 507-725-5281.

ORGANIC RYE

Organic rye for sale. Cleaning available. Sno Pac Farms, Caledonia MN. 507-725-5281.

200+ TONS 2021 ALFALFA

Ohio zip: 44851 NICS-certified. Planted 8/25/2020. Albert Lea Viking 3800 alfalfa (22#) and Safe Tall Fescue (7#). Pattern tiled fields with excellent fertility program. Entire 2021 crop for sale ~200 tons. Baled in large squares or heavy rounds – your choice. Baled as possible – dry or balage (you wrap). Sold by the (15% moisture) dry ton, tested and weighed right out of the field and delivered, at a pre-agreed price for the entire year. If you would like to add 46 acres worth of high-quality hay to your organic operation, please call/text Eric at (952) 250-4488.

CERTIFIED ORGANIC HAY

Large Round or Small Square Bales. Available late August/ early September 2020. You pick up. Ironton, WI. Call 608-495-9817.

CERTIFIED ORGANIC OAT HAY

100 large round bales of net wrapped, certified organic oat hay. Oat, alfalfa, red

clover mix. \$95 per bale. Located near Cedar Rapids, IA. Call 319-551-7319.

ORGANIC WHEAT STRAW

Organic wheat straw 3x3x8. 150 bales. Brodhead, WI. Call Milton at 608-921-3765.

ORGANIC RYE

2100+ bu. certified organic rye. \$13 per bu. uncleaned. \$15 bu. for cleaned rye. Pickup on the farm. Located south central Iowa. 65 miles south of Des Moines.

Call 641-414-4523.

CERTIFIED ORGANIC ALFALFA - LARGE SQUARES

Certified Organic Alfalfa 3x4x8 large square bales. 1st cutting RFV range from 181-150. Price range from \$240-200 per ton. Shredded and put up dry. Also have 2nd cutting test pending. Located in North Central Missouri. 660-654-3175.

2020 FIRST CROP HAY

MOSA certified 4' x 5' First crop net wrapped round bales. No rain. \$75.00 each, delivery not included. North Central Wisconsin. Please call 715-590-2639

MOSA CERTIFIED ORGANIC CORN

20,000 bu. of MOSA Certified Organic Corn. Blue River 49K70. Test weight 49.7. Crack 3%. FM 3%. Moisture 14.5%. NW Indiana. Call 219-246-1058.

MOSA CERTIFIED ORGANIC ALFALFA HAY

2020 first crop Alfalfa Hay. Round 4x5 foot bales approx. 1,300 pounds, pre-cut and double wrapped in plastic. 96 bales from 3 fields labeled W,E,N on forage analysis reports available on request. Average RFQ, CP as %DM, and moisture content per field respectively are: W field 183.5, 16.56, 19.4; E field 194.9, 17.69, 24.5; N field 235.4, 18.86, 35.2. (54 bales/W field, 37/ E field, 5/ N field) Price is \$1.50 per RFQ per ton. Contact: belties@caldwellfarms.com or Lorna 715-457-6765; c:715-207-9745.

COMMERCIAL

ORGANIC SYSTEM PLAN CONSULTANT AVAILABLE

Need help with your Organic Systems Plan paperwork for certification? Contact OSP Consulting LLC at clogriv@yahoo.com or 217-629-7940 to set up a consultation. Reasonable fees. Provider has training in organic inspection and has been a technical service provider for the last ten years. Simply provide your detailed records and the answers to a few questions, and an individualized, thorough, and appropriate organic systems plan will be created for your operation.

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.

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.

relying on grants. Grants take a huge amount of time to write and they never are for certain. With a grant you have to do what they tell you to do; not necessarily what helps your mission. They are always looking to fund things that are innovative and new, not what you know works. This is where the cemetery came in. The revenue we get from the cemetery is the primary funding that pays for everything else we do at the Farley Center. We do everything on a pretty small budget thanks to incredible staff and supporters."

"Part of my Dad's vision was not only that the Natural Path Sanctuary would pay for the farm and other Farley Center spending, but also be able to support other non-profits that support underresourced communities in the Madison area. We don't want to compete with them, but to support them through donations, partnerships and sponsorships- really any way we can. Everything that we do is funded by the cemetery," emphasized Shedd.

"We now have eight professional farmers here. We have them from everywhere: Mexico, the US, Canada, Russia, Belarus, Tibet, India, Thailand, and China. We have immigrant farmers from all around the world which is pretty amazing," emphasized Shedd.

"For the past four years we have been training Madison area residents about beekeeping. In Madison you can have bees in your backyard. Everybody is interested in them because they know bees are a threatened species and that bees are so important to our food, so we created a beekeeper incubator system. It started with two local beekeepers coming out to keep bees and then they came to us with the idea to train others. Our beekeepers mentor 8-12 new beekeepers each year. We also have orchards and perennial gardens like currants, elderberries, and asparagus."

"Our role is providing land, equipment and infrastructure, technical assistance to both farmers continuing their career and those looking to start farming. As the farm has matured, we no longer consider ourselves to be just a farm incubator program. But a collaborative farm," noted Seth Riley, Farley Center Farm Manager. "Many incubator farms have had similar experiences. 'Graduation' from our program, or purchasing their own farm or securing a long term lease is not in the cards for some farmers, for a multitude of reasons. The collaborative model has no graduation date or expectation of moving on. However some farmers do, we have had three farmers in the past two years acquire land and move entirely off of our farm. We always try our best to support them in achieving whatever aspirations they have for their farming career."

"The farmers in our program come from varying backgrounds, immigrants who want to continue farming but arrive here without the resources or college students who want to start a career in the local food system, others are entrepreneurial, they want to make Value Added Products or run food carts and restaurants with the food they grow. We're here providing a habitat for those dreams," continued Seth.

"We have 16 acres of farmland at the Farley Center and this year have eight farm businesses comprising about 15 farmers. Many are partnerships. They sell at farmer's markets, CSAs, and through their own a grower's cooperative. Some also sell direct to chefs and grocery stores. Our farm is a patchwork of market gardens. The plots are anywhere from a ¼ acre to four acres, and all are certified organic through MOSA. We have many agro-forestry and permaculture plantings spread throughout the property as well. Not only are the farm staff here to provide assistance, but the farmers look after each other as well. When we are all working out in the fields side by side, it's a great communal atmosphere."

"We also seek to connect private landowners with farmers who are interested in renting land. In this way we can help farmers that are seeking a foothold for their operation, but that don't want or need the training and support our collaborative farm provides. These matches can be a win-win for the farmer and landowner, and we are glad to facilitate. In our area there has been increased focus on both community gardens and market farms. I have been happy to see more publicly owned farm land being turned over to community agriculture projects. I believe that not only does this agricultural model do good for the land and our health, but it can also greatly benefit our local economies and communities"

"There is a national organization of incubator farm and training programs, NIFTI, that helps coordinate programs. And we partner with other farms in our region, the closest one being the Sinsinawa Mound Collaborative Farm in Hazel Green, WI. And our longtime partner Big River Farms in Minnesota. Our future plans are to keep doing what we are doing and to keep helping our farmers reach their goals. We feel that we are successful if they are successful."

"We need to find new ways to support farmers of color and those in underserved communities. Everything that we do as individuals has a tiny effect on the problem compared to what needs to be done. Sure, we can vote, but that is a small thing too. By supporting organizations committed to social justice that are trying to support underserved communities we can amplify our effect," stressed Shedd.

To learn more about The Farley Center, visit their website at: farleycenter.org ■

organic certification process.

NOP-o80: Traceability Techniques

Traceability audits provide a window into the procedures of an operation and identify procedural weaknesses that may impact organic integrity. These audits are complex processes that require special technical and interpersonal skills from an inspector. This course:

- Reviews the purpose of traceability techniques within the organic control system.
- Teaches certifiers, inspectors, and reviewers traceability auditing techniques.
- Explains and demonstrates two types of audits: a trace-back audit and a mass balance audit.

We encourage all clients to take courses related to your organic production.

National List Proposed Rule

On June 8th the AMS published a proposed rule amending the National List of Allowed and Prohibited substances as recommended by the National Organic Standards Board. The proposed rule would add:

- Oxalic acid dihydrate to §205.603(b) "as topical treatment, external parasiticide or local anesthetic as applicable" with the annotation "For use as a pesticide solely for apiculture."
- Pullulan at §205.605(a) for use only in tablets and capsules for dietary supplements labeled "made with organic (specified ingredients or food group(s))."
- Collagen gel casings at §205.606

Comments were accepted until August 7th, and will be considered in preparation for publication of a final rule. MOSA comments on the rule were generally supportive of the addition of pullulan, focused on the manufacturing process of collagen gel casings, and offered the opinion that apiculture standards would be great to have as we consider adding materials like oxalic acid for apiculture.

As a reminder, as rules become final, the National List is updated online in the [Electronic Code of Federal Regulations](#). MOSA notifies you of these updates through email and newsletter notifications. You can request a new National List booklet from MOSA at any time. ■

After working for 10 years to develop the organic community consensus that led to the OLPP, we find this disappointing to say the least, and question whether most family farm stakeholders truly have the time or “human capital” to digest complex economic analyses and push against corporate interests. Likely, this withdrawal decision will be fodder for more criticism of NOP/USDA and the organic industry, contrary to a better-place vision from organic’s heart.

Sights forward

On a Monday last March, as the Covid-19 pandemic hit the US and our culture changed quickly, my daughter quickly packed up and decided she was going to ride this out in a small apartment with her friend. She figured it would be a few weeks; I knew it might be a one-way trip. I watched as the small car rounded the corner, unsure of our future, and wondering if I might not see her again. Recalling a century-old writing from Kahlil Gibran’s *The Prophet*, I said to myself, “There goes the arrow.”

When a young mother with a newborn baby at her breast asks for advice on children and parenting, Gibran’s prophet responds:

*Your children are not your children.
They are the sons and daughters of Life’s longing for itself.
They come through you but not from you,
And though they are with you yet they belong not to you.*

*You may give them your love but not your thoughts,
For they have their own thoughts.
You may house their bodies but not their souls,
For their souls dwell in the house of tomorrow, which you cannot visit, not even in your dreams.
You may strive to be like them, but seek not to make them like you.
For life goes not backward nor tarries with yesterday.
You are the bows from which your children as living arrows are sent forth.
The archer sees the mark upon the path of the infinite, and He bends you with His might that
His arrows may go swift and far.
Let your bending in the archer’s hand be for gladness;
For even as He loves the arrow that flies, so He loves also the bow that is stable.*

In these times, many figurative arrows have already been released from our bow. There’s not much we can do but pray that good arrows go swift and far, learn how to set a better course where our efforts fall short, and take action to keep ourselves healthy and safe. But, with the praying we still must move our feet toward home, to be like a steady archer setting course for our house of tomorrow. I am grateful for this organic movement and hopeful that our clear vision, forward thinking, and better regulatory teeth help us all find our way home. ■

MOSA

CERTIFIED ORGANIC

122 W. Jefferson Street
P.O. Box 821
Viroqua, WI 54665
608-637-2526

NON-PROFIT ORG.

U.S. POSTAGE PAID

PERMIT No. 588

LA CROSSE, WI

— the — ORGANIC Cultivator

VOL. 19 ISSUE 3 FALL 2020

MOSA BOARD OF DIRECTORS

Keith Ashley-Wright, *President*
608-632-0067
kbwright83@gmail.com

Mary Benson, *Treasurer*
773-793-0456
mary.ellabellafarm@gmail.com

Beth Unger, *Secretary*
madrepadre@gmail.com

Lizzy Haywood, *Director*
liz.haywood@pfc.coop

Altfrid Krusenbaum, *Director*
krusen@krusengrassfarms.com

Carla Wright, *Director*
savanna@chorus.net

Visit us at mosaorganic.org • Contact us at mosa@mosaorganic.org
Visit us on Facebook: facebook.com/MOSAOrganicCertification
Joe Pedretti, Editor • (608)637-2526 • jpedretti@mosaorganic.org