



# THE ORGANIC CULTIVATOR

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## FIELD & FOREST PRODUCTS

### Spawning a Successful Organic Mushroom Business

by Joe Pedretti, Outreach Manager

Joe Krawczyk and Mary Ellen Kozak had a vision very early in their careers, a vision that has guided them to this very day. On the day I met Joe for this interview, he was preparing to meet with his architect to finalize plans for their 2016 business expansion. Out of space at their current location, the ex-



pansion will double their building size and greatly improve work flow. The new location will also be in the Peshtigo, WI industrial park, which will help with shipping logistics. I was soon to see why this major expansion was necessary—with an expected 30% growth for 2015, one million dollars in sales, 8 employees, and a production facility with every inch utilized, Joe and Mary's business of 32 years is definitely ready for the next level.

The story begins in 1982. Joe and Mary had met as students at the University of Wisconsin-Madison. Joe had finished his degree in botany and was working in venture capital, primarily investing in ginseng projects in the Midwest. Mary was just finishing her agronomy degree. 1982 was the year that Gary Leatham's article "Growing Shitake Mushrooms on Natural Logs" was published by the Forest Products

Laboratory at UW-Madison. Joe and Mary already had a passion for mushrooms, an important aspect of their Eastern European heritage. This book solidified the idea that mushroom production in the Midwest was an open opportunity. By 1983, they had decided to get into mushroom spawn production.

In 1985 their opportunity arrived. They were able to buy 40 acres of Mary's grandparent's farm near



Peshtigo, WI. Mary found a job with Land o' Lakes, which allowed Joe to focus on getting the new business up and running. It was an exciting but busy time. They got married, moved from Madison, and started their new business—Field & Forest Products. The name reflected their initial plan to grow mushroom spawn and crops like strawberries and raspberries. Business started strong as the interest in mushroom production boomed in the Midwest, and by 1988 Mary was able to join Joe full time on the farm. By this time, they abandoned the horticultural crops and focused solely on the mushroom business.

By 1989, they were ready for the 2nd edition of the business—adding mushroom cultivation, but they

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## FROM THE DIRECTOR



**Cori Skolaski**  
Executive Director

This is a beautiful time of year, isn't it? Nice long days, planting, growing, greening, blooming... it makes for a busy and productive time! May 1 was the due date for MOSA clients to submit their updated organic system plans and assorted

paperwork; if you haven't done so, please get in touch with us immediately so you don't incur any additional late fees and your certification continues without a hitch. Here at MOSA we are working on performing initial reviews on the paperwork we've received to ensure everything is in place; it is then forwarded to an inspector for the annual inspection. In the last issue of this newsletter, MOSA's Inspection Manager Jenny Cruse wrote an article about what to expect at your inspection. If you didn't get a chance to read it, I highly recommend you do so before your inspector pays you a visit. After the inspection, a certification specialist will review your plan and make a certification decision. Some things to remember:

- If you are adding new land to your certificate, it will need to be inspected prior to grazing or sales.
- New facilities, production lines, unique production equipment, or herds must be inspected before they can be added to your certification.
- All organic retail labels must be approved by MOSA before use.
- All inputs must be reviewed and approved before use.
- If you need to change your organic system plan or certificate, review NOP Handbook Instruction 2615 for details. Be sure to notify us of any of the changes listed above or if portions of your opera-

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# POLICY UPDATES-WHAT YOU NEED TO KNOW

by Jackie DeMinter, Certification Policy Manager

**Biosecurity and avian influenza** continue to be topics to pay attention to with confirmed cases of highly pathogenic avian influenza (HPAI) in the Midwest. As a reminder, the NOP has advised us that if local, state, or federal health authorities determine that additional action is needed in the areas we certify, we are to work with our clients to determine what emergency measures are necessary and for how long. If you become aware of a 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.**

**It's planting time! A reminder on Seed, Seedlings, and Planting Stock in Organic Crop Production:** As the inspection season approaches, organic producers must compile complete documentation for all seeds, seedlings, and planting stock. Documentation verified during the annual inspection includes: a **Seed Table** form listing all varieties of seeds, seedlings, and planting stock planned for use in the current year (new clients or updating clients with new land must also list all seed, seedlings, and planting stock used within the past 36 months), **receipts** documenting the purchase of all seed, seedlings, or planting stock, at least one **seed tag** for each variety purchased, and **organic certificates** documenting the organic status of all annual seedlings, planting stock (if applicable), and seed (such as garlic) purchased from another organic operation (if applicable). If **treatments** or **inoculants** are planned for use, they must be listed on the Crop Input Inventory form and approved before use. If nonorganic seed or planting stock is purchased, an **Organic Search** form, or the catalogs that were consulted, must be available, along with **untreated documentation** and **non-GMO verification** for crops with GMO potential.

NOP requirements for the use of seed, seedlings, and planting stock:

- **Seed** (crops, cover crops, plowdowns, and microgreens) must be organic if commercially available. Before nonorganic seed may be used, an organic search must be performed. Nonorganic seed must be untreated and non-GMO;
- **Seed for edible sprouts** (for human or organic livestock consumption) must be certified organic;
- **Annual seedlings** must be certified organic unless a temporary variance has been granted by the National Organic Program;
- **Planting Stock** (annual and perennial) must be organic if commercially available. Before nonorganic planting stock may be used, an organic search must be performed. All nonorganic planting stock must be untreated post-harvest. The standards permit the immediate harvest of an organic crop from nonorganic perennial planting stock that comes bare root, in root balls, or in planting media, though the planting stock itself must be managed organically for a minimum of 12 months before it may be sold as organic;
- **Treatments** and **inoculants** for seed and/or planting stock must be reviewed by MOSA for compliance with the National Organic Standards and approved before use;
- Seeds, annual seedlings, or planting stock treated with prohibited substances required for compliance with Federal or State **phytosanitary regulations** may be used in organic production. Documentation of the phytosanitary requirements is required.

**Planning for micronutrient applications?** Remember to have documentation showing **deficiency of the nutrients** you are planning to apply. Trace minerals

include zinc, copper, boron, manganese, molybdenum, selenium, cobalt and iron. If you are using soil or tissue testing for documentation, some best practices to follow are:

- Since labs differ, plan for testing with the same lab you have used in the past to maintain consistency.
- Check your fertility product label. Are all nutrients included being tested for? If not, be sure to request testing. Some labs will not include all traces, like molybdenum and cobalt, in a standard test.
- Are samples taken from representative areas of fields where the products will be used?
- Soil tests should also include organic matter levels.
- Talk to your inspector or contact MOSA about other forms of documentation accepted.
- Remember new products need MOSA approval prior to use. We'll always inform you of any applicable restrictions.

## Do you use auction facilities for sale or purchase of organic animals?

If so, you should be aware of a new clarification from the National Organic Program about auction barn certification. Facilities that take over management of the livestock (house them temporarily, feed them, bed them, etc.) must be certified as organic livestock handlers. For sales where management is not assumed by the facility, the National Organic Standards does still allow for confinement of livestock for sorting, shipping, and sales, given the animal is maintained under continuous organic management, including organic feed, throughout the extent of their allowed confinement. Contact us with any questions regarding requirements for the facility you use.

**Changes to NOP Reinstatement Instruction** – In February, the NOP published a revision of NOP Handbook Instruction 2605, regarding Reinstating Suspended Organic Operations. That's here: <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5087114>. The Instruction gives more clarity regarding the effect of a certification suspension on products that are produced or handled during a suspension period. Even after reinstatement, products that are produced and/or handled prior to reinstatement may not be sold, labeled, or represented as "100% organic," "organic," or "made with organic (specified ingredients or food group(s))." This includes: crops harvested prior to reinstatement; stored crops from previous harvests; milk or eggs produced prior to reinstatement; animals slaughtered prior to reinstatement; products processed prior to reinstatement; and products packaged or labeled prior to reinstatement. Any crops harvested, livestock products produced (e.g., eggs, milk, meat, fiber), and products processed or packaged after reinstatement may be sold, as stated on the certificate.

**New Enforcement Instruction** – In January, the NOP published a revision of NOP Handbook Instruction 4002, regarding enforcement of the USDA Organic Regulations. <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5087117>. The Instruction includes a revised Penalty Matrix, which presents generally applicable criteria for determining the appropriate enforcement action when a certifier identifies a violation of the OFPA and/or USDA organic regulations. Certifiers are to respond to violations in a manner consistent with the penalty matrix, but the NOP recognizes that there may be exceptional

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needed to expand the original building. Just a few years later, they made another big addition to further expand their production space.

The 80s and early 90s were a boom time for the mushroom business, as it was really getting strong interest and publicity. There was also a lot of tobacco money being moved into this new enterprise. As tobacco production faded in the Midwest, due to declining prices, mushroom production was being touted as a good alternative. By the mid-90s, growth slowed as the money and support dried up. In the 2000s however, business picked up again, due to the interest in organic, locally grown food. "It took a full generation to get established in the American psyche," noted Joe. "After the economic recession of 2007-8, things really took off as producers looked to diversify their production".

"The biggest boon to our business has been the better understanding of production technologies and better strains of spawn, many of them from the Japanese. When we started, we could get one harvest of shitake mushrooms after two years. Now we can get a harvest within nine months. The Japanese are the leaders in log-based shitake cultivation. What they can do is phenomenal," said Joe, who had just returned from a recent trip to Japan. "Within a few years, we hope to match them. We need to refine our technique and to learn more about wood decay science."

80 to 85% of the current business is devoted to spawn production. Field and Forest Products offers a dozen different shitake strains, and also spawn for oysters, lion's mane, hen of the woods, reishi, nameko, agaricus, wine cap, and other specialty mushrooms—eleven varieties in all. 10% of their business is selling tools and supplies, and a small 5% is devoted to fresh mushroom production, which is mostly sold to distributors that service the Madison market. The new facility will be exclusively for spawn production. The current farm will be used for shitake production.

Spawn cultivation is an art and a science. It starts with careful selection, cleaning and sterilization of the growing medium. There are two primary components: sawdust and organic grains. Straw is also used, specifically for oyster mushrooms. Sawdust is brought in fresh from a local mill and then cleaned and screened. It is then sterilized with heat. Organic rye grains (seed quality) are first hydrated and then sterilized with heat. The growing medium is then mixed (each mix is unique to the mushroom type), bagged and then inoculated with mushroom spawn. Organic straw is pasteurized in a water bath before inoculation with oyster spawn. Proper substrate mixing, sterilization and inoculation are critical to ensuring that other microorganisms do not contaminate the substrate and that the spawn grows well.

Inoculated bags are then stored in a climate controlled room and monitored for proper growth (incubation stage). Most commercial growers want sawdust based spawn, which is easier to use when inoculating logs. Some growers still prefer plugs, which Field & Forest also offers. "Our goal is to always have spawn on hand for growers. We maintain our own strains right here on the property.

We constantly test them for vigor and productivity. Good production on the log is critical; our customers expect it," emphasized Joe. Field & Forest Products ships mushroom spawn all over the country and to Canada. They average 900 pounds of sawdust spawn per day and 500 pounds of grain spawn per week. They also produce 200,000 spawn plugs per week during the busy season.

Joe and Mary have grown their spawn and mushrooms organically from the very beginning, and all of their products are certified organic. "Dave Engel approached us in 1988 to help write the first organic standards for mushroom production. For us it was always the right thing to do. The high quality of organic grain makes it much better for the production of spawn. Even though most of our clients do not need for the spawn to be certified organic, it is the right thing to do, it makes life easier, and it makes a big difference in the quality of the product. We buy all of our organic seed grains from Albert Lea. The quality and cleanliness are the best we have found," said Joe.

Joe and Mary are also committed to education and helping to develop the industry. They host workshops on mushroom production, are frequent speakers on the subject around the country and the world, are the original founders of the Shitake Mushroom Growers of WI group, actively participate in research projects, and have made numerous trips to the former Soviet republics to teach their production methods. "The more the merrier," notes Joe.

To learn more about Field and Forest Products and organic mushroom production, visit their website at: [www.fieldforest.net](http://www.fieldforest.net) or call them at 1-800-792-6220. ■

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tion are being removed from organic production, if there has been the application of any prohibited substances whether intentional or not, or any other change that you think may affect compliance.

- Your current organic certificate does not expire unless you surrender or we suspend or revoke it; your 2014 organic certificate is valid until we issue your 2015 certificate. As long as we don't tell you otherwise, you are good to go.
- At any time, you can log into [mymosa.org](http://mymosa.org) to review your organic system plans and paperwork, see your inspection report, view or pay certification or inspection fees, and view and print your organic certificate. Over one third of our clients have gone paperless, and find it very convenient.
- If you call MOSA, it would be very helpful if you would have your account number handy; it is on the update paperwork we sent you in February, and it is printed on your organic certificate.

In February at our annual Board of Directors meeting, we said a fond farewell with our deepest appreciation to Courtney Tchida for her service on the board. At that time, Judith Reith-Rozelle, Adrian Plapp, and Annalisa Hultberg were reelected, and we welcomed Denise Thornton as the newest board member. Denise is a freelance writer based out of Ridgeway, Wisconsin and has a deep interest in sustainable agriculture and environmental issues. Rachel Armstrong was appointed President, Kat Becker was reappointed Vice President, Denise Thornton was appointed Secretary, and Judith Reith-Rozelle was appointed Treasurer. Thanks to all of MOSA's board members for their guidance and support!

This year we are rolling out a new way to meet our clients – regional meetings! We will hold two of them in late summer, in locations that are yet-to-be-determined. In upcoming years, we'll get out farther afield, but to get our feet wet and work out the logistics, in 2015 they will be fairly close to our office in Viroqua. There will be more to come on this, but if you are located within driving distance of the meeting location you can expect to receive an invitation and we certainly hope to see you there.

This newsletter is chock full of information we hope you find helpful. If you have any questions, comments, or content suggestions, please feel free to get in touch. You can contact me directly at [cskolaski@mosaorganic.org](mailto:cskolaski@mosaorganic.org) or 608-637-2526. Thank you for reading, and thanks for your continued commitment to organic integrity. ■

# RECORDKEEPING THAT WORKS

by Mark Geistlinger, Staff Inspector



photo Harriet Behar

What's your opinion about chores? Most people think of them as, well, a chore. Every farm has them—scraping the alleys and pens, feeding the chickens, watering the seedlings, etc. Food processing operations have chores, too, but dress them up with headings like “pre-operation sanitation” or “equipment calibration verification” or “waste management”. Chores must be done or “the yuck” piles up, the animals go hungry, or the equipment stays gunky and doesn't work right.

Many MOSA food handlers and farmers have entertained me with stories of times when doing the chores was significantly less than fun: the rain was slashing sideways, the silo unloader wouldn't unload, or the cleaning spray ball in the storage tank broke and wouldn't function. MOSA clients have also, though, told me of ways they improved their businesses with ideas they thought of during chore-time. Clearly these producers stayed sufficiently optimistic and thoughtful while interacting with the daily details of their operations to consider means of gaining efficiency and increasing quality.

Maintaining the records of a farm or food processing business provides similar challenges and opportunities. Reacting to recordkeeping requirements with fear and resentment, then procrastination and half-heartedness, gives recordkeeping an unnecessarily large, looming power. Bringing a can-do attitude to recordkeeping, as most MOSA clients do in my experience, keeps the chore tolerably short and painless and provides a chance to gather and analyze information about one's operation that can lead to improved processes and greater production. In her “What to Expect at Inspections” article in the March-April Cultivator, MOSA's Inspection Manager, Jenny Cruse, outlined the records that might be needed at an organic crop, livestock, or handling inspection. I'd like now to discuss why these records are needed and the advantages and limitations of some different means of collecting and organizing these records.

## SO WHY KEEP RECORDS?

Since organic certification is based on developing and following a plan for how you intend to farm or make food (or feed or fiber) organically, many of the records required for organic certification provide necessary details about the operation that aren't included in the Organic System Plan that every MOSA client completes. For farms, these records may include a map, Field Plan, or a Livestock List, while a handler might need a Product Profile and a Standard Sanitation Operating Procedures description. As noted in the National Organic Standards, these records “must be adapted to the particular business that the certified operation is conducting” [205.103].

Production records, such as a field activity log for a crop farmer, a flock health record for a poultry producer, or a roasting log for a coffee roaster, show whether or not the organic plan is being followed. Together with receipts for inputs (such as seeds, fertilizers, health products, organic food ingredients) into the operation, and invoices for sales of organic products out of the operation, production logs also establish the traceability that organic certification promises to the customers of organic products. Additionally, these records allow the inspector to determine if there were sufficient organic ingredients and allowed inputs to

justify the amount of organic products sold or distributed. Finally, some records are required to document a response (cleaning equipment, switching sanitizers, or turning off boiler chemicals) to a commingling or contamination concern.

MOSA provides several possible documents that clients can use as part of their recordkeeping system, yet we also accept other formats if they show all of the necessary information and are auditable by MOSA inspectors. (Your MOSA Reviewer will determine what's acceptable regarding the certification records at your operation.) One great reason for using one's own records is that integrating information required for organic certification into a farm or handler's own production records will likely help the operator capture both types of information more efficiently and consistently. For the farmer that keeps certain records only because they are required for certification, adding some production information to these records may provide a similar incentive for the farmer to maintain the record and then use it to improve her farm. For example, MOSA might ask a farmer to keep track of the sale of hay from non-organic buffer strips, so the farmer uses the requirement as motivation to develop harvest and sales records that help improve the productivity and profitability of this aspect of the farm.

## WHERE TO RECORD ACTIVITY INFORMATION?

Activity logs, where you make notes about your farming or handling practices, are the main example of a record for which MOSA does NOT provide a ready-to-use form, mainly because there are so many variations available depending on the nature and goals of your operation. Which format you choose will depend on your choice of paper or computer and whether you are maintaining the record solely as a certification requirement or as a means of understanding and analyzing your business. All collection formats work best when you record the information the same day, before you forget about it (and so you can forget about it because it's written down). Making the records understandable and easy to use for everyone involved in the operation will reduce the grumbling and improve participation. Here are the main activity records I see during MOSA inspections:

- **Calendar**—for the wall (perhaps with a motivating photo!) or desktop. The calendar provides an easy-access, one-stop location for the farmer with a few crops (typically grains and forages) to capture information about field and livestock operations. The calendar is great for the farmer who, if not certified organic, wouldn't keep a record of when crops were planted or where manure was spread.
- **Daily diary**—pocket-sized (for portability) or larger (for more space). The diary provides an open canvas for the farmer who wants to make a daily record of life on that farm, though the information about specific farm activities is not easily retrievable later.
- **Map with notes about activities.** The annotated map works well for farms with fewer notations (i.e. not a lot of inputs or activities) and farmers with neat handwriting. The map provides a superior visual overview of the events on the farm for a year.
- **Template**—with pre-formatted, fill-in boxes or lines. The template requires some work to find or make a form for each production area, such as a field or individual sow, but then reduces the amount of writing necessary when the farmer fills in each form. The template allows the farmer to obtain both the information needed by the certifier and the farmer on one form, and to analyze this information later according to the production unit. For example, a separate card for each dairy cow provides a great record over the life of that cow, though it takes some effort on the front end to record the information on the card rather than on a chronological record such as a barn calendar.
- **Spreadsheet**—paper or electronic. The spreadsheet is the workhorse record of the diversified produce operation because of its flexibility and expandability: the endless number of columns allows for an equally infinite number of information headings. Typically the fields or crops make up the Y-axis along the vertical left side, and the activity information (for instance, planting date, seed variety, planting spacing, etc.) makes up the column headings along the horizontal X-axis to the right. Variations of spreadsheets are also used by some food processors as production logs. While most spreadsheets I've seen are written on a computer, not all have been: some farmers make a handwritten chart each year on which they quickly record field activities throughout the season.



- Software—computer-based, for crops, livestock, handling, sales, inventory. These packages require the greatest front-end commitment of time and money, to purchase the computing hardware (desktop, tablet, smart phone) and software, to learn the system, to train users. These systems, though, offer an entirely different order of usefulness and flexibility. Information can be sorted in multiple ways, accessed by several users, and stored virtually. Nearly all food handlers use some type of software system for at least some aspects of their recordkeeping system. On a farm level, the few crops and livestock software packages I've seen can all incorporate the necessary information for organic certification. One in particular, COG Pro, is specifically designed to gather and organize information for certified organic farms and produce records that meet certifiers' requests.

#### HOW TO ORGANIZE THE RECORDS AND FILES?

How the records for an operation are written will somewhat determine how they are saved and organized. As with how records are developed, how they are organized can be inexpensive and relatively easy upfront, but not allow for retrieval or analysis later, or the organization system can be costly to establish but allow for tremendous opportunities for analyzing and using the information to improve the business in a host of ways. Here's an overview of the organizational methods I've seen at MOSA farms and food processors:

- The Box—not always a shoebox, but sometimes it has been. For the producer who has not previously saved records, this method at least locks down papers, particularly receipts and seed tags, before they scamper away. Retrieving items for organic certification from the box makes for a longer inspection.
- Clipboards with records. This works well if each clipboard contains a record of a certain type, such as seed tags or sales invoices. Farms and food handlers with elaborate software systems will often also use clipboards with paper templates for the various records kept by employees during production; data from the templates is later entered into the software system.
- Binders with paper records separated by tabs. Records, or pockets with smaller papers such as seed tags, are hole-punched and then placed into the appropriate sections of the binder. Older records are eventually archived or a new binder is set up every year or two. Producers who use this system love having all records for a year in one portable place.
- File box or cabinet with paper files. Like the binder, the small file box allows for all of the current records to be neatly organized in one location, and this package even comes with a carrying handle. The large cabinet is used for folders with archived records, or as the only storage area if portability isn't necessary.
- Computer-based collection. As more farming business is conducted electronically, more farmers use computers to store a host of documents such as receipts, e-mail transactions, completed certification forms, and photos of farm activities.
- Management software. The software packages briefly mentioned above provide means of storing and linking documents within the software. MOSA's online certification system, MyMOSA, provides cloud-based storage of certification records accessible to both MOSA staff and the client. Farms and handlers with networks can access records from multiple computers in or out of the office.

Developing the best recordkeeping system for each farm or processing operation depends much on the farmer or managers involved, their interest in using computers, the time they want to devote to creating or learning a new system, the desire they have to use records in their operation beyond those required for organic certification. Recordkeeping, like doing chores, can be reduced by finding new efficiencies and working as quickly and consistently as possible, but some chores and records have never gone away completely on any operation I've inspected. Thus, a certain smiling tolerance may be occasionally needed to move recordkeeping and chores up the continuum from unbearable to tolerable, while an attitude of appreciation for what can be learned about one's operation from doing chores or keeping records can move them even further, toward satisfying or, dare I say it, enjoyable. ■

## MEET MOSA STAFF MEMBER: FELICIANA PUIG, CERTIFICATION REVIEW MANAGER



### What do you do in your position at MOSA?

As the Certification Review Manager, I oversee the certification review staff. I do my best to cultivate a positive workplace culture within our department, to ensure that we're adequately staffed, and that the reviewers have the training and resources they need to serve our clients well. I also manage the certification review cycle for our clients. Early

in the season, our review work is primarily focused on reviewing each client's organic system plan and paperwork to ensure that everything is in order for the coming year and annual inspection. Later in the season, we perform a more in-depth final review of each client's file and inspection report to determine compliance with the organic standards. I also serve on MOSA's Management Team and as a staff inspector for MOSA.

### What do you do with your time outside of MOSA?

Outside of work, I spend much of my time gardening, going for long walks, cooking, and spending time with family and friends. I also love photography and many other art forms, playing music, traveling, backpacking, and canoeing. My partner and I are currently in the early stages of building a house on my family's farm near Viola.

### How long have you been at MOSA? Can you tell us about one thing that was really different when you started?

I joined MOSA in 2012, shortly after moving back to the area. One major change that I've witnessed during my time here is our transition to a software system that supports electronic communication with clients who prefer to submit their paperwork online. While any major change like this has its challenges, thanks to the tireless work of many of our staff members and helpful feedback from our clients, our new system is working well.

### Why organic?

Organic food has been central to my life for as long as I can remember. My mother, who now runs a winter greens CSA, has been an avid organic grower for many years. While we weren't necessarily wild about it then, my sister and I were blessed to grow up weeding for years on end in our market-scale family garden, helping with food preservation, and learning about the importance of organic production methods. We were also blessed to live in a place where there is such a vibrant organic farming community and it's possible to source almost everything you need from a farmer you know and want to support.

### Why MOSA?

MOSA is a wonderful place to work. Our staff is talented, hardworking, honest, and dedicated to our mission. Our work is interesting and dynamic. I also appreciate MOSA's active engagement with other certifiers and the greater organic community.

### What are a few great things about your life?

I'm grateful for so many things. It's wonderful to call this beautiful place and community home again, to live near my family, and to have meaningful work that is engaging and enjoyable. ■

# ORGANIC COST SHARE

## Help with Certification Costs

by Lexy McManaway, Cost Share Coordinator

We've been receiving phone calls from our MOSA clients wanting to know when they'll be able to apply for 2015 Organic Cost Share reimbursement. It's a little early in the season. Most states open their cost share program in late spring to early summer. If you haven't received your Organic Cost Share application by early July, please contact MOSA or your state cost share program (state contact information is provided at the end of this article).

If you're unfamiliar with, have not yet participated in the Organic Cost Share Reimbursement Program, or would like a refresher on Cost Share basics, read on!

## WHAT IS ORGANIC COST SHARE?

For many certified organic operations the Organic Cost Share Program has played a critical role in financial planning and has helped to defray costs that conventional operations do not incur. In 2001, Congress allocated funding in five-year increments to reimburse certified organic producers and handlers for some of the costs of organic certification. In 2014 during the federal budget debates, the Organic Share Program nearly lost its funding, but after a down-to-the-wire Congressional debate, the program was renewed and fully funded (\$11.5 million) for five years. Throughout the debate MOSA consistently advocated to keep Organic Cost Share. The program is funded at the federal level. The states administer the applications and disburse the reimbursements.

## HOW MUCH IS REIMBURSED?

The amount reimbursed depends upon: 1) the amount the certified organic operation has incurred and paid in allowable organic certification costs from October 1 through September 30, and 2) number of categories or "scopes" for which an operation is certified. Some states do not require that the costs be both incurred and paid between October 1, 2014 and September 30, 2015, and only require that fee was paid. Check your state Cost Share Program and application for requirements. Allowable costs include certification and inspection fees. An organic operation can be reimbursed up to 75 percent for each category or "scope" of certification with a maximum reimbursement of \$750.00 per scope. Examples of organic certification scopes include crop, livestock, wild crop, and handler/processor. An organic operation certified in one scope that pays \$1,000.00 in certification costs between October 1, 2014 and September 30, 2015, can expect \$750.00 in cost share reimbursement. An organic operation certified in three scopes that pays \$3,000.00 in allowable costs between October 1, 2014 and September 30, 2015 can expect \$2,250.00 in Cost Share reimbursement. Typical costs include paid certification fees and inspection fees. Late fees are not reimbursable. The state Cost Share program determines the reimbursement amount.

## WHO'S ELIGIBLE?

To be eligible for 2015 Organic Cost Share reimbursement, an organic operation must be actively certified between October 1, 2014 and September 30, 2015.

## WHAT'S THE APPLICATION PROCESS?

Most states send out their cost share application packets in June - July. The application is typically one-page and requires a W-9 form. You may have to contact your state's Organic Cost Share program to request an application—particularly if newly certified. Some states require that the applicant include a copy of the organic certificate. If your operation is newly certified between October 1, 2014 and September 2015, you'll need to include a copy of your organic certificate with your Cost Share application. MOSA has a copy of each state's application. If you need a copy, let us know.

## WHEN ARE THE REIMBURSEMENTS SENT OUT?

Some states reimburse on a first-come, first serve basis; some states wait until November - December to distribute reimbursements.

## DOES MOSA HELP?

• MOSA is committed to simplifying the application process and helping our clients receive their reimbursement. We work closely with the individual state Cost Share programs, making sure that each state has a list of actively certified clients and paid fee information. Clients have asked whether MOSA completes the cost share applications or sends out the reimbursements. MOSA does not complete, submit, accept, or process cost share applications. The applicant must send the application to their state Cost Share Program.

• Please check our website [mosaorganic.org](http://mosaorganic.org) and the Organic Cultivator for Cost Share updates.

## WHEN IS THE APPLICATION DEADLINE?

For most states the application deadline is October 31, 2015. However, application deadlines do vary from state to state and can be earlier than October 31. MOSA encourages you to confirm your state's Cost Share application deadline and application requirements by contacting your state Cost Share Program.

Below is the list of state contacts and application deadlines for MOSA-certified organic operations. If you find that you can't reach your state Cost Share contact, or need the state's website address, please contact MOSA. Utah does not participate in Organic Cost Share.

For more detailed information about Organic Cost Share, see the National Organic Program website: <http://www.ams.usda.gov>.

MOSA staff is always happy to answer your questions about cost share and the application process and help you as needed. Feel free to call us 608-637-2526.

*State Cost Share Contact List on Page 7*

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## INDUSTRY NEWS

### NOSB: CALL FOR NOMINATIONS

The National Organic Standards Board (NOSB) is a Federal Advisory Committee that provides advice and recommendations to the Secretary of Agriculture on the implementation of the Organic Foods Production Act. NOSB members are volunteers and come from across the organic community. Each member is appointed by the Secretary of Agriculture to a five-year term.

USDA seeks nominations for the following five (5) positions on the NOSB:

- Two (2) organic farmers/producers,
- Two (2) public or consumer interest group representatives, and
- One (1) USDA accredited certifying agent.

Committee member duties include:

- Attending committee meetings (travel paid by USDA)
- Participating in bi-monthly subcommittee conference calls
- Reviewing materials and/or recommending changes to the National List of Allowed and Prohibited Substances
- Advising the Secretary on other aspects of the USDA organic regulations

Written nominations must include a cover letter, resume, and an AD-755 Application Form, and must be postmarked on or before May 15, 2015.

For more information: <http://www.ams.usda.gov> and search for the NOSB Call for Nominations

Your answers will be strictly confidential. Only summary results will be examined. We will ensure that those who have returned the questionnaire are not contacted again.

# STATE COST SHARE CONTACT INFO BY STATE\*

*\*subject to change.*

## CALIFORNIA

Sharon Parsons  
California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814  
P: (916) 900-5202  
Email: SParsons@cdfa.ca.gov

## ILLINOIS

Jeff Squibb  
Illinois Department of Agriculture, Bureau of  
Marketing and Promotions  
801 E. Sangamon Avenue  
Springfield, IL 62702  
P: (217) 524-9129  
Email: jeff.squibb@illinois.gov  
Application Deadline: 11/1/2015

## INDIANA

Tammy Butts or Beth Goeb  
Indiana Department of Agriculture  
One North Capital Ave, Suite 600  
Indianapolis, IN 46204  
P:(317) 232-8335 or (317) 232-8334  
Email: tabutts@ig.IN.gov or bgoeb@ig.IN.gov  
Cost Share Website Application Deadline:  
10/15/2015

## IOWA

Maury Wills or Tammy Stotts  
IA Dept. of Ag and Land Stewardship  
Wallace State Office Building  
Des Moines, IA 50319  
P: 515-281-5783  
F: 515-281-6236  
E-mail: maury.wills@idals.state.ia.us  
tommy.stotts@iowaagriculture.gov  
Application Deadline: 11/15/2015

## KANSAS

Josh Roe  
Kansas Department of Agriculture  
109 Southwest 9th Street, 4th Floor  
Topeka, KS 66612  
P: (785) 368-6463  
C: (785) 410-0958  
Email: Josh.Roe@kda.ks.gov  
Application Deadline: 10/31/2015

## MARYLAND

Deanna Baldwin  
Maryland Department of Agriculture  
50 Harry South Truman Parkway  
Annapolis, MD 21401  
P: (410) 841-5769  
F: (410) 841-2750  
E-mail: Deanna.Baldwin@maryland.gov

## MASSACHUSETTS

Mary Jordan  
Massachusetts Department of Agricultural  
Resources  
251 Causeway Street, Suite 500  
Boston, MA 02114  
P: (617) 626-1700 F: (617) 626-1850  
E-mail: Mary.Jordan@state.ma.u

## MICHIGAN

Robin Rosenbaum or Josh Grant  
MI Dept. of Agriculture  
P.O. Box 30017  
Lansing, MI 48909  
Robin Rosenbaum - P: 517-335-6542  
Email: rosenbaumr@michigan.gov  
Josh Grant - 517-284-5789; F: 517-335-4540  
Email: grantj5@michigan.gov  
Application Deadline: 10/1/2015

## MINNESOTA

Meg Moynihan  
Minnesota Dept. of Ag.  
625 N. Robert Street  
St. Paul, MN 55155  
P: 651-201-6616 F: 651-201-6120  
E-mail: meg.moynihan@state.mn.us  
Application Deadline: 10/31/2015

## MISSOURI

Charlie Hopper or Jane McIntosh  
Missouri Department of Agriculture  
1616 Missouri Boulevard  
P.O. Box 630  
Jefferson City, MO 65102  
P: (573) 522-4170 or (573) 522-1955  
F: (573) 751-2868  
Email: Charlie.Hopper@mda.mo.gov or  
Jane.McIntosh@mda.mo.gov  
Application Deadline: 10/31/2015

## MONTANA

Breanna Caldwell  
MT Dept. of Agriculture  
P.O. Box 200201  
Helena, MT 59620-0201  
P: 406-444-3730 F: 406-444-7336  
E-mail: dcrabtree@state.mt.gov  
Application Deadline: 10/15/2015

## NEBRASKA

Steve Martin  
NE Dept. of Agriculture  
301 Centennial Mall South  
Lincoln, NE 68509-4947  
P: 800-422-6692 F: 402-471-6863  
E-mail: steve.martin@nebraska.gov  
Application Deadline: 11/15/2015

## NEW JERSEY

Anne Marie Ference Or Debra McCluskey  
New Jersey Department of Agriculture  
369 South Warren Street  
Trenton, NJ 08608  
P: (609) 777-0098 or (609) 984-2225  
F: (609) 984-2508  
E-mail: Anne.Marie.Ference@ag.state.nj.us  
or Debra.McCluskey@ag.state.nj.us  
Application Deadline: 11/16/2015

## NEW YORK

Anne St. Cyr  
NY Dept. of Ag & Markets  
10 B Airline Drive  
Albany, NY 12235A  
E-mail: Anne.St.Cyr@agriculture.ny.gov  
Application Deadline: 10/31/2015

## NORTH CAROLINA

Heather Barnes  
Marketing Specialist  
1020 Mail Service Center  
Raleigh, NC 27699-1020  
P: 919-707-3127 F: 919-715-0155  
E-mail: heather.barnes@ncagr.gov  
Application Deadline: 9/30/2015

## NORTH DAKOTA

Emily Edund  
North Dakota Dept. of Agriculture  
600 E. Boulevard Ave. - #602  
Bismarck, ND 58505-0020  
P: 701-328-4759; 800-242-7535  
F: 701-328-4567  
E-mail: edlund@nd.gov  
Application Deadline: 10/31/2015

## OHIO

OEFFA, Attn: Organic Cost Share  
41 Croswell Road  
Columbus, OH 43214  
614-262-2022; x. 222; x 226  
Email:  
ccameron@oeffa.org; samira@oeffa.org  
Application Deadline: 10/31/2015

## PENNSYLVANIA

Jared Grissinger or Kyle Heffner  
PA Dept. of Agriculture  
2301 N. Cameron St.  
Harrisburg, PA 17110-9408  
P: 717-705-9513 F: 717-787-5643  
Email: Jared.Grissinger - jgrissinge@state.pa.us  
Email: Kyle.Heffner - kyheffner@pa.gov  
Application Deadline: 11/16/2015

## SOUTH DAKOTA

Ty Eschenbaum  
South Dakota Dept. of Agriculture  
523 East Capitol  
Pierre, SD 57501  
P: 605-773-5436; 800-228-5254  
F: 605-773-3481  
E-mail: ty.eschenbaum@state.sd.us  
Application Deadline: 11/15/2015

## WISCONSIN

Juli Speck, Grants Manager  
WI Dept. of Ag. Trade, & Consumer Protection  
P.O. Box 8911  
Madison, WI 53708-8911  
P: 608-224-5134  
E-mail: Juli.Speck@wisconsin.gov  
Application Deadline: 10/31/2015



# NATIONAL ORGANIC STANDARDS BOARD SPRING MEETING

## Big Sunset List, and More

Stephen Walker, Compliance Manager

The spring meeting of the National Organic Standards Board (NOSB) was April 27-30, at the San Diego Marriot in La Jolla, CA. The NOSB advises on what materials should be allowed in organic production and handling, and assists in standards development. MOSA's Jackie Deminter, Felician Puig, and Steve Walker attended the meeting. MOSA presented several written and verbal comments on agenda items. Written comments are available on our website. We'll report on meeting decisions in the next issue of this newsletter.

Below is an overview of the various topics planned for discussion as of the time of this writing. Most notably, NOSB sought information from the public on over 150 material inputs used in organic systems, which are due for their periodic sunset review in 2016 and 2017, to determine if they should stay on the National List. Over the course of its next two meetings, the NOSB will review the large majority of the fertilizers, pest control products, processing aids, and ingredients currently allowed for use by certified organic operations. A summary of sunset materials is at the end of this article.

## PETITIONS AND DISCUSSION DOCUMENTS

### Crops Subcommittee (CS)

The CS voted against three material petitions. *Exhaust Gas* was petitioned to be allowed for rodent control. The CS cited concerns about effects of exhaust gas on non-target species and soil microorganisms. *Calcium Sulfate* was petitioned for use in organic crop production. The CS noted there are number of natural mined alternatives. *3-decene-2-one* was petitioned for use on organic potatoes as a sprout inhibitor. The CS noted specific preventative storage procedures and currently allowed non-synthetic alternative materials for sprout inhibition which indicated this material was not needed.

The CS also presented a *Report on Contamination Issues in Farm Inputs*. This suggests a path for evaluating each potential contaminate from each potential farm input (fertilizers, compost, manure, etc.) with a goal to identify prevention and remediation techniques. MOSA commented on this document, encouraging careful prioritization of research and use of the current technical review system.

### Livestock Subcommittee (LS)

The LS supported a petition to revise the *annotation for Methionine*, currently allowed on the National List for inclusion in organic poultry diets at specific rates. The petition amends the annotation allowing producers to average inclusion rates of Methionine over the animals' lifetime, to accommodate for stage of life variations in dietary demands. MOSA's comments on this petition supported the lifetime averaging, and we suggested sensible means by which compliance could be verified.

The LS voted in support of a two petitions. *Acidified Sodium Chlorite* (ASC) was recommended for addition to the National List as an allowed pre and post teat dip. ASC acts as a disinfectant and can be used as an alternative to iodine based teat dips. *Zinc Sulfate* was recommended for addition to the List as a footbath only. It's used to treat hoof conditions in livestock and provides an alternative to currently allowed copper sulfate footbaths.

The LS also presented an *Aquaculture Legacy Document* for discussion, which provides a timeline and analysis of action by NOSB on reviewing synthetic materials for use in organic aquaculture. This states the subcommittee's intention to revisit aquaculture materials upon issuance of a proposed rule.

### Handling Subcommittee (HS)

The HS supported a petition to remove synthetic *Glycerin* from the List at §205.605(b) and add the agricultural form(s) to §205.606 as an allowed non-organic ingredient when organic forms are not commercially available. Only "organic" and "agricultural" forms of glycerin would be allowed in NOP certified products.

The HS voted against a four materials petitions. The HS rejected *Whole Algal*

*Flour* as an allowed nonorganic agricultural ingredient when organic forms are not available. The HS felt that alternatives were available. *Ammonium Hydroxide* was rejected as an allowed synthetic boiler water additive. It has the potential to cause significant toxic damage to humans, mammals, aquatic systems and greenhouse gasses. *Polyalkylene Glycol Monobutyl Ether* (PGME) was also rejected as a synthetic boiler steam additive for use in feed pellet mills, because it comes in contact with the feed pellets and organic feed pellets can be made by using a mechanical system alternative. *Triethyl Citrate* (TEC) was rejected for use as a whipping enhancer for egg whites during processing. It's used to recreate textures and related properties, which are lost during pasteurization. This fails the National List criteria for synthetics used in processing.

The HS also voted in favor of several *Ancillary Substances for Microorganisms*. "Ancillary substances" are intentionally added to a formulated generic handling substance on the National List. These substances do not have a technical or functional effect in the finished product, and are not considered part of the manufacturing process already reviewed by the NOSB. The HS thought that all of the substances listed were necessary because they are what keep the microorganism alive, pure and able to perform. Formulations of the desired microorganism products are not available without some of these ancillary substances. Since organic carriers and substrates are sometimes available, the HS also recommended that organic sources for ancillary substances must be used when available. MOSA comments support the direction of the proposal but expressed some concerns about the static nature of the identified materials perhaps failing to accommodate unforeseen but better additions. We also noted that, rather than just requiring organic alternatives for the ancillary substances, requiring organic preference for microorganisms would be more effective towards creating an incentive for development of organic alternatives.

### Materials Subcommittee (MS)

The MS presented *two discussion documents regarding excluded methods*. One sought further responses from organic stakeholders on issues related to NOP's regulatory definition of "excluded methods." This aimed to update/improve the current definition in light of new methods that have emerged since it was adopted in 1995. MOSA commented on this in past meetings. Public comments from the previous discussion were summarized and new questions were asked. A second document sought stakeholder feedback on precautions that should be taken to prevent and minimize contact with GMOs in organic production and processing. The document noted certified operators are already extensively carrying out such practices, but indicated formal guidance from the National Organic Program would aid prevention strategies. The document includes a proposal for a seed purity standard for non-organic seed, used when organic alternatives are not commercially available.

### Compliance, Accreditation, and Certification Subcommittee (CACS)

The CACS responded to a November 2014 memo asking them to review and make suggestions on NOP's *Peer Review Process*. The CACS suggested changes related to the composition of the Peer Review Panel, including inclusion of an NOSB member on the panel, and giving priority to folks with strong inspection, certification and accreditation experience. The CACS also recommended that NOP pursue a rule change to allow the hiring of contractors as an independent assessment body.

## 2016 CROP, LIVESTOCK AND HANDLING SUNSET MATERIALS

2016 Sunset Materials for Crops and Handling were planned to come to a vote at the La Jolla meeting.

For crops, *Ferric phosphate* appeared like it would remain on as an allowed substance for control of slugs and snails in organic crop production. *Hydrogen chloride* also looked set to remain allowed for de-linting of cottonseed prior to planting in organic cotton production.

For handling, the HS found no concerns regarding the continued listing for six materials: *Egg White Lysozyme*, *Microorganisms*, *Activated Charcoal*, *Peracetic Acid*, *L-Malic Acid*, and *Sodium acid pyrophosphate*.

However, the HS proposed removing the allowance for three boiler additives - *Cyclohexylamine*, *Diethylaminoethanol*, and *Octadecylamine*, and recommended removing *Tetrasodium Pyrophosphate* for use as a meat analogue.

see SPRING MEETING on page 9



## 2017 SUNSET MATERIALS

As noted above, there's an extensive list of materials which will expire from the National List unless they are reviewed and renewed by the USDA before the materials' 2017 sunset dates. Documents that were prepared for the meeting included a summary of current National List status, references to past technical reports, past NOSB actions, and regulatory history, as applicable. For this meeting, the NOSB sought comments, especially focusing on providing new information on these materials. For many materials - those marked below with an asterisk - particular additional information was sought. Particular questions about particular materials asked for information such as use details, availability of alternatives, or presence of ancillary substances. For consideration, MOSA provided a chart with use data and other staff comments, gleaned in part from our internal materials review database, which currently identifies over 5600 generic or brand name materials. Please contact MOSA if you have any questions about items on this sunset review list.

### Handling §205.605(a) Nonsynthetics allowed:

Acid, Alginic\*; Acid, Citric; Acid, Lactic; Attapulgit; Bentonite\*; Calcium carbonate; Calcium chloride; Dairy cultures\*; Diatomaceous earth; Enzymes\*; Flavors\*; Kaolin\*; Magnesium sulfate\*; Nitrogen; Oxygen; Perlite; Potassium chloride; Potassium iodide; Sodium bicarbonate; Sodium carbonate; Waxes (Carnauba)\*; Waxes (Wood rosin)\*; and Yeast\*.

### Handling §205.605(b) Synthetics allowed:

Acidified sodium chlorite\*; Alginates\*; Ammonium bicarbonate; Ammonium carbonate; Ascorbic acid; Calcium citrate; Calcium hydroxide; Calcium phosphates\*: monobasic, dibasic, tribasic; Carbon dioxide; Chlorine Materials\*: calcium hypochlorite, chlorine dioxide, sodium hypochlorite; Ethylene\*; Ferrous sulfate; Glycerides\*: mono and di; Glycerin\*; Hydrogen peroxide\*; Magnesium carbonate\*; Magnesium chloride\*; Magnesium stearate\*; Nutrient vitamins and minerals\*; Ozone\*; Phosphoric acid\*; Potassium acid tartrate\*; Potassium carbonate\*; Potassium citrate; Potassium phosphate\*; Sodium citrate; Sodium hydroxide\*; Sodium phosphates\*; Sulfur dioxide; Tocopherols\*; and Xanthan gum\*.

### Handling §205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic:"

Casings\*; Celery powder\*; Chia (*Salvia hispanica* L.)\*; Colors (various, 17 total)\*; Dillweed oil\*; Fish oil\*; Fructooligosaccharides\*; Galangal, frozen\*; Gelatin; Gums\*: Arabic, Carob bean, Guar, Locust bean; Inulin-oligofructose enriched\*; Kelp\*; Konjac flour\*; Lecithin—de-oiled\*; Lemongrass-frozen\*; Orange pulp, dried\*; Orange Shellac – unbleached\*; Pectin (non-amidated forms only)\*; Peppers (Chipotle chile)\*; Seaweed, Pacific kombu; Starches, Cornstarch (native)\*; Sweet potato\*; Turkish bay leaves\*; Wakame seaweed (*Undaria pinnatifida*); and Whey protein concentrate\*.

### Crops §205.601 Synthetic substances allowed for use in organic crop production.

Alcohols: Ethanol, Isopropanol; Chlorine Materials\*: Calcium hypochlorite, Chlorine dioxide, Sodium hypochlorite; Hydrogen peroxide\*; Soap-based algicide/demossers\*; Herbicides, soap-based\*; Newspaper or other recycled paper\*; Plastic mulch and covers; Soaps, ammonium\*; Ammonium carbonate; Boric acid\*; Elemental sulfur\*; Lime sulfur\*; Oils, horticultural\*; Soaps, insecticidal\*; Sticky traps/barriers\*; Sucrose octanoate esters; Pheromones\*; Vitamin D3; Coppers, fixed\*; Copper sulfate\*; Hydrated lime; Potassium bicarbonate\*; Aquatic plant extracts; Humic acids; Lignin sulfonate; Magnesium sulfate; Micronutrients: Soluble boron products, Sulfates, carbonates, oxides, or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt\*; Liquid fish products\*; Vitamin B1, C, E; Ethylene\*; Sodium silicate\*; EPA List 4 - Inerts of Minimal Concern\*; and Microcrystalline cheesewax\*.

### Crops §205.602 Prohibited nonsynthetic substances.

Ash from manure burning; Arsenic; Lead salts; Potassium chloride\*; Sodium fluoaluminate; Strychnine; and Tobacco dust (nicotine sulfate)

### Livestock §205.603 Synthetic substances allowed for use in organic livestock production.

Alcohols\*: Ethanol, Isopropanol; Aspirin\*; Atropine\*; Biologics, Vaccines\*; Butorphanol\*; Chlorhexidine\*; Chlorine Materials\*: Calcium hypochlorite, chlorine dioxide, sodium hypochlorite; Electrolytes; Flunixin\*; Furosemide; Glucose\*; Glycerin; Hydrogen peroxide\*; Iodine\*; Magnesium hydroxide; Magnesium sulfate; Oxytocin\*; Parasiticides: Fenbendazole\*; Parasiticides: Ivermectin\*; Parasitocides: Moxidectin\*; Peroxyacetic/Peracetic acid\*; Phosphoric acid\*; Poloxalene; Tolazoline\*; Xylazine\*; Copper sulfate\*; Formic Acid\*; Iodine\*; Lidocaine\*; Lime, hydrated; Mineral oil\*; Procaine; Sucrose octanoate esters; Methionine\*; Trace minerals; Vitamins\*; EPA List 4 - Inerts of Minimal Concern\*; and Excipients\*.

### Livestock §205.602 Prohibited nonsynthetic substances

Strychnine. ■

## PERIODIC RESIDUE TESTING – PREVENTING PROHIBITED MATERIALS IN PRODUCTION AND HANDLING

Michael Crotser – Certification Specialist, Jenny Cruse – Inspection Manager

Beginning in the fall of 2012, the National Organic Program (NOP) published instruction documents to clarify the rule requiring organic certification agencies to test organic products for prohibited materials. Certifier requirements for pesticide testing are outlined in *NOP Instructions 2610 – Sampling Procedures for Residue Testing* and *2613 - Responding to Results from Pesticide Residue Testing*. The rule itself states that certifiers must periodically conduct residue testing for product labeled or sold with an organic claim, including raw commodities and processed foods. NOP 2610 specifies that five percent of operations must be sampled annually. The goal is to provide broader screening of organic products and prevent the sale of organic products that are contaminated with prohibited materials. As a result of this instruction, MOSA began collecting more frequent residue samples from farm and handler operations in 2013.



Although residue testing was first described in the 1990 Organic Food Production Act and later in the National Organic Standards, the more recent instruction ensures regulatory consistency when prohibited materials are found on organic products for market. Operational scopes that may be tested include livestock, crops, wild crops and handling. The NOP recommends sampling organic end-use products (e.g. potatoes or soybean meal) when it comes to prohibited material residue testing, however there may be instances when testing soil, water, or non-harvested plant material is appropriate. MOSA may also sample for pathogens, GMOs, heavy metals, or other environmental contaminants. Farm and handling operations may be selected for testing based on the following:

- Suspected application of prohibited materials
- Suspected contamination or drift

see RESIDUE TESTING page 11

## CLASSIFIEDS

### LIVESTOCK

Wanted: Interested in buying all classifications of organic cattle and calves for meat production.

Mike Noble, Kenyon, MN 507-789-6679

### LAND

Hobby Farm for Sale: R-1130 Westby: Ridge top Hobby Farm on 41 Acres! 34 Acres ORGANIC tillable with a SPRING, Morton buildings including a pole shed & insulated and heated garage. There is also a retired dairy barn. Very rural & private but located not far from town between Viroqua & La Crosse. Septic sized for 3 bedrooms. \$355,000 – For additional information, please call Dan Kiedinger, United Country-Oakwood Realty, LLC at 608-606-5344 or email: dan@oakwoodrealty.com.

### BUSINESS

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

### 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' 8", 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@q.com.

For Sale: Clipper Super 64D grain cleaner with augers. Good condition. Heidi 815-297-2253.

### EMPLOYMENT

FARMHAND (several positions)

Join our lively work crew! FT/PT, from mid-May into early November, at vegetable farm near Madison, WI. Jobs include greenhouse seeding and watering, weeding, harvesting, washing and packing produce. Prior farming experience is valuable but not required. Must be physically fit. Competitive wage, catered lunch two days per week, subsidized carpools from Madison, plus lots of organic veggies to take home. Friendly work environment. Learn more at [www.tipiproduce.com/employment](http://www.tipiproduce.com/employment).

### VEGETABLES/TRANSPLANTS/SEEDS

Order Now for spring delivery of certified organic field-ready plants. Vegetable, herb, and flower; up to 240 varieties. We use our own compost based potting mix plus balanced organic nutrients. Custom orders for farmers. [information@weststar-farm.com](mailto:information@weststar-farm.com) or 608-239-7570.

For Sale: CERTIFIED ORGANIC TRANSPLANTS from Gardens of Eagan: Plants to fit your schedule, your farm size, your budget. Guaranteed vigor, MN grown! All the details at [www.gardensofeagan.com](http://www.gardensofeagan.com). Request a quote today 507-645-2544. Shipping to MN and 6 surrounding states.

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

### FORAGES

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](mailto:dennis@inpaksystems.com). Brooklyn, WI.

For Sale: LOWER PRICES! MOSA certified, 1st and 2nd crop grass/ alfalfa/ clover mix, 4x5' round, stored inside. \$45 to \$70 a bale. Larry Sproutte Farm [organichay11@hotmail.com](mailto:organichay11@hotmail.com) or call 715-748-6863 Medford, WI. Also firewood, all red oak - \$85 a face cord, cut and split.

For Sale: Oats, MOSA Certified. Approximately 1500 bu. \$6.00 bu. FOB. Central MN. Call Barry at 320 444 3956.

For Sale: Certified Organic 1st Crop Hay. Alfalfa, clover, timothy and brome. Stored inside. 1200 lb. rounds. \$75 a bale. Also, Peas/Oats Bales - \$50 each. Call 608-654-7782 and leave a message. Cashton, WI.

For Sale: 1st, 2nd, 3rd crop 2014 organic hay, mostly alfalfa. Large, round bales. \$85.00/Bale.

Mike Noble, Kenyon, MN 507-789-6679.

For Sale: ETTRICK, WI: 840 big square wrapped organic hay bales, 3ft x 3ft x 6ft, 1000lb plus, 1st-4th crop bales, no rain on any of the bales & loading is available. There is also a super clean line of farm machinery available including Case IH 886 MFWD tractor with cab, a New Holland 575 square baler, a John Deere 956 MoCo discbine & more. Randy & Brenda Stein (608-484-0850) online auction ending Tuesday, March 3, 2015. [www.hyauctions.com](http://www.hyauctions.com) H&Y Auctions WI Reg Auc Lic #41.

Buyers Wanted: Custom Crop Growers Available. Certified Organic. We will plant grain crops to supplement your needs. Experienced producers. Boaz, WI area. Call John or Craig at 608-536-3187.

For Sale: First crop 4 x 5, MOSA-Certified organic round bales. \$45.00 a bale. Please call - 920-650-2976.

For Sale: Certified organic alfalfa baleage. 1st, 2nd, and 3rd cuts. Wrapped, a little on the dry side. Also some oats/peas baleage. Price negotiable. Call Paul Proksch. Stoddard, WI. 608-498-2882.

For Sale: Certified Organic High Moisture Corn. Hybrid is from Charlie Brown Seed Co. VP3912 High Protein and High Oil Corn. Contact: Pechacek Organics by Jerry 715-262-5115 or 715-821-0793

For Sale: MOSA-certified good, clean ear-corn in wood crib; 2000 small square bales hay - 1st and 2nd crop in barn, grass/alfalfa mix; oat/pea baleage - 1000 lb round, individually wrapped, cut at boot stage. Priced reasonably, take all or part. Located near Bangor, WI. Call 608-790-6461

For Sale: Certified organic baleage, alfalfa/brome-grass mix. 4x4 round bales individually wrapped. High quality, reasonably priced, delivery available. Located in SE WI. Call 262-728-2256

For Sale: Seven large round bales of organic pasture mix hay for sale. Afton MN. Not able to deliver them but I can load them onto a trailer. Price is

flexible. Chris Bliska, Elm Tree Farm, Afton, MN. 651-998-0507

For Sale: Certified organic dry hay and corn shreds. 3 x 3 x 8 bales. Stored inside. 1st, 2nd, and 3rd cuts. Call Paul Proksch. Stoddard, WI. 608-498-2882.

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

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

## EVENTS

### MAY/JUNE

#### Women Caring for the Land Workshop

**May 5 | 8:30 a.m.-3 p.m. | Altoona, WI**

**May 6 | 8:30 a.m.-3 p.m. | Medford, WI**

**May 7 | 8:30 a.m.-3 p.m. | Marshfield, WI**

**June 3 | 8:30 a.m.-3 p.m. | Verona, WI**

Organized by the MOSES Rural Women's Project and WFAN, these workshops teach women land-owners how to assess and improve the health of their soils through cover crops, no-till and strip-till, and other conservation practices. For details, see <http://mosesorganic.org/projects/rural-womens-project/events/> or call MOSES at 715-778-5775.

#### Agritourism Workshop

**May 13 | 5:30-8:30 p.m.**

**Free | Chanhassen, MN**

**May 19 | 5:30-8:30 p.m.**

**Free | Coon Rapids, MN**

Hosted by the Minn. Dept. of Health, explore the human and environmental health issues at agritourism events and operations, including farm tours, apple orchards, pumpkin patches, and farms that host the public. Topics will include petting zoo safety, food licensing and handling requirements, and more. For questions, contact Joni Scheffel at [joni.scheffel@state.mn.us](mailto:joni.scheffel@state.mn.us).

#### Introduction to Small Ruminant Husbandry

**May 16 | 1-5 p.m. | \$80 | Ashby, MN**

Hosted by SFA, this workshop is for anyone considering adding goats or sheep to their sustainable food production system or those who want to manage their small ruminants more holistically. To find out more: [https://org2.salsalabs.com/o/7232/p/salsa/event/common/public/?event\\_KEY=73310](https://org2.salsalabs.com/o/7232/p/salsa/event/common/public/?event_KEY=73310).

## Basic Chicken Processing Workshop

**May 30 | 9 a.m.-12 p.m.**

**\$50 | Gerald, MO**

**June 6 | 9 a.m.-12 p.m.**

**\$50 | Gerald, MO**

Join Stuart Farm for this hands-on 3 hour class, students will learn the basics of slaughtering and butchering a chicken. Each student will take home 1 chicken they process. To find out more: <http://stuartfarm.com/our-classes/basic-chicken-processing-workshop/>, 573-764-2324.

## Raising and Processing Meat Chickens

**May 31 | 9 a.m.-3 p.m. | \$140**

**Gerald, MO**

**June 7 | 9 a.m.-3 p.m. | \$140**

**Gerald, MO**

Join Stuart Farm to learn how to successfully raise and process your own meat chickens. The class will consist of a short lecture and hands-on processing. Handouts will cover all of this information for future reference. Each student will take home 4 chickens they processed. To find out more: <http://stuartfarm.com/our-classes/raising-and-processing-meat-chickens-workshop/>, 573-764-2324,

## Midwest Farm Energy Conference

**June 17-19 | Morris, MN**

Hosted by WCROC, learn about optimized and cost-effective energy systems for dairy, swine, and crop production. Conference includes several speakers, practical information for Ag producers, and a Renewable Energy bus tour. To find out more: <http://wcroc.cfans.umn.edu/events-education/midwest-farm-energy-conference>, (320) 589-1711

## Comprehensive Elderberry Workshop & Field Tour

**June 18-19 | Jefferson City, MO**

Hosted by River Hills Harvest, learn about traditional culture, marketing workshops and harvest and post-harvest handling of the fragile elderberry fruit. Pre-register before June 7. To find out more: [www.riverhillsharvest.com](http://www.riverhillsharvest.com), [info@riverhillsharvest.com](mailto:info@riverhillsharvest.com), or 573-424-9693. ■

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## cont. POLICY UPDATES from page 2

situations that require a response other than the one recommended. The instruction categorizes possible enforcement responses by certifiers as: Minor Issues – Conditions for New or Continued Certification; Notices of Noncompliance; Major Noncompliance – Denial or Proposed Suspension of Certification; and Major Noncompliance – Denial or Proposed Revocation of Certification. The Instruction also discusses Mediation and Appeals. In light of this Instruction, we'd like to remind all operators to notify MOSA when making changes that could affect your compliance, and to ensure that all inputs are allowed, before they are used.

**Nanotechnology** – In 2010, the National Organic Standards Board (NOSB) recommended that engineered nanomaterials be considered synthetic and prohibited in organic production and processing. The NOSB proposed defining engineered nanomaterials as “substances deliberately designed, engineered, and produced by human activity to be in the nanoscale range of 1-300 nanometers, because of very specific properties or composition (e.g., shape, surface properties, chemistry). In March, the NOP issued Policy Memo 15-2, which clarifies the status of nanotechnology in organic systems. That's here: <http://www.ams.usda.gov/AMSv1.0/getfile?dDocName=STELPRDC5110949>. The memo notes that engineered nanomaterials cannot be allowed in organic systems unless they are added to the National List through the usual petition and review process. However, the NOP is not establishing a separate definition for engineered nanomaterials, but instead refers to specific FDA and EPA documents. ■

## cont. RESIDUE TESTING from page 9

- Other factors deemed to present higher risk
- Investigation of a complaint
- As a part of a random, routine surveillance program

Many of our farm and handler operation are selected at random. However, as a certifier, we have the discretion to use any of the above criteria. In past years, MOSA has relied primarily upon multi-screen pesticide analysis for raw and processed organic products and has done some GMO testing. This year, we have plans to include risk-based pathogen testing. This will include salmonella testing in poultry barns that are not subject to the FDA Egg Safety Rule and coliform testing of sanitized produce wash water.

MOSA does not generally announce testing, and, if chosen, your test will likely be conducted at your annual inspection. Cost of routine residue testing is not billed to the individual operation; rather the costs are dispersed among all MOSA clients each year. In some cases testing may occur during an unannounced surveillance inspection. Surveillance inspections are based on investigative need outside of the normal certification process. If a surveillance inspection identifies a prohibited material, you may be charged inspection and laboratory fees.

When sampling, your inspector will follow methodology outlined in NOP Instruction 2610 – Sampling Procedures for Residue Testing and in accordance with the sampling requirements of the lab we work with. Most often, an inspector will take a sample from your operation. However, some samples may be taken at a retail outlet, such as a grocery store. Your inspector will let you know that a sample is being taken and supply you with a sample receipt. Be sure to retain this receipt for your records.

After inspection, your sample will be sent to an accredited laboratory. Individual labs have varying timelines, but test results are usually available within 2-6 weeks. Expedited services are sometimes available if time is a factor. If contaminants are detected, the report will provide the concentration in parts per million. Positive results will be categorized according to NOP Instruction 2613 - Responding to Results from Pesticide Residue Testing. Detections are compared to existing Environmental Protection Agency (EPA) Tolerance Levels for federally register pesticides. Food and Drug Administration (FDA) Action Levels are used if no EPA Tolerance Level exists. Specifically, FDA tolerance levels are established for persistent pesticides that are no longer registered by the EPA (e.g. DDT).

There are prohibited materials that do not have an established EPA Tolerance Level or FDA Action Level. Responding to presence of these materials in a sample is outlined in NOP Instruction 2613. When prohibited materials are detected, corrective action must be taken by the certified operation. Other NOP standards may be applied to a positive residue test. Standard 205.272 describes measures to prevent commingling and contact with prohibited substances as part of an approved Organic System Plan. To be compliant with this standard, a farmer must document that buffers adequately protect the organic integrity of crops and that prohibited materials do not contaminate organic products. If a residue test is positive, this standard may also be applied.

Typically, you will be notified of your test results in your annual Certification Determination Letter. A copy of the test results will be sent with the letter. Most often test results are negative, indicating there is no concern. However, if test results are positive, you will be notified immediately and the notification might be sent prior to your annual Certification Determination Letter.

In general, positive results require a producer to identify the cause of contamination and provide a corrective action plan to prevent future contamination. A Notice of Non-Compliance may be issued based on the operation's response. Also, you will be notified if the sampled product can or cannot be marketed and sold as organic. If you receive a positive test result, it does not necessarily mean loss of certification. In many cases, the operator will provide a satisfactory response and corrective action plan. If you receive a positive test result, it is important that we hear your side of the story. It is important your response is well thought out, reasonable and auditable. We want to be sure that all residue tests are conducted in a fair and accurate manner. If you have questions about residue testing, or how to respond to a residue test, please contact our office. ■





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