Hope all is well with you in these early autumn days. As we head into fall, MOSA's certification staff is in the thick of final reviews. Our work generally reflects the seasons of our clients, and like yours, it’s a 365-day business. For our producer and farmer clients, we are more likely to inspect operations during the growing season, while inspections for processors and handlers may occur at any time during the year as those operations are generally not so calendar-driven. Regardless of the type of operation, the NOP requires that every certified operation be reviewed and inspected annually.

**Inspections.** The NOP also requires certifiers like MOSA to perform an unannounced inspection on 5%
at all the different laws across America and I started lobbying our governmental officials: my alderman, my state and my house reps. I went there twice and managed to change the laws by creating a craft distillery bill in Illinois. Once we did that, it completely changed the way business could be conducted in Illinois and made it possible to have the business model that we wanted. A place where people could come and visit us, learn about what we were doing, try the product, and of course buy the product while they were there,” noted Sonat.

“I grew up in Chicago, so I know how Chicago works a little bit- ‘the city that works, but you have to know how it works.’ We looked at the entire city and figured out where we would want to locate our distillery in different wards. I then wrote about ten alderman letters about what we wanted to do and that I was interested in their ward. I received two responses. The first response I received was quite immediate from Gene Schulte, the alderman from the 47th ward. He called me and said ‘I love what you are doing, I want you to do this in my ward, and I know a location that would be perfect for you.’ We did like the location, and that was ultimately where we decided to start our distillery. I reached out to the right person, and that helped make it happen. It was very fairy tale.”

“If we were going to leave our careers, our well-established careers, to start a distillery we wanted to make sure that we were doing things at the highest possible quality. We wanted everything to be organic. Robert’s Grandparents always used organic raw materials and we wanted to do that as well. Our products are all certified Kosher, and we tried to work with farmers that are as local as possible. All of our corn comes from an organic farmer in Illinois.”

“We also wanted to make sure that we had our own signature style, and we didn’t want to do things the way that had been traditionally done in America. We only wanted to use the ‘heart cut’ of the distillate, which is the best portion of what comes off of the still. Robert’s family distills brandy, which are fruit spirits. If you are making apricot or pear brandy you would never use the ‘tails’ which comes off of the still last. The tails don’t taste all that great. Traditionally, American distilleries will take the heart cut, which is the best and purest portion of the distillate and mix it with the tails and age it for a long time, often adding caramel coloring and then putting it on the market. This is understandable, since American companies were often making millions and millions of gallons of whiskey and selling it all over the world. It would be financially difficult for them to not use whatever is usable. Where we differ greatly is that we are able to only focus on the best portion of the distillate, which is the heart cut. This is what the brandy makers in Austria do. This is our signature style. We are able to do this because we take our tails and re-distill them, so you do get heart cuts again, pure ethanol that is not muddied by the bad flavors. However, since re-distilling tails strips it of it flavor and aroma, it is not a product we could use as a whiskey. The hearts produced by re-distilling the tails are used as a base for our liqueurs, which is a perfect application of the redistilled hearts. It doesn’t matter if you have stripped away the flavor and aroma of bases for liquors, because you want the liquor to taste like the flavor they are: ginger, rose hips, or caraway. Because we have such a large portfolio of products, it gives us that level of flexibility to focus not only on the best ingredients, but also the best portions of the distillates for our products,” explained Sonat.

“When we built our infrastructure for the distillery we had a slight advantage in that we are both fluent in German. A lot of the equipment for smaller scale distilleries comes from Germany. My husband spoke with all of the distilleries that were the equivalent of artisan/craft distilleries in Austria and Germany that he knew through his family’s connections, and found out all of the equipment that they were using. From there, he determined the best options for us.”

“Our ability to mobilize and organize quickly gained a lot of attention. A number of newspapers began to write about us. After that, we got a flood of phone calls from people interested in starting their own distilleries. That is why we also decided to start our own consulting company in tandem with starting KOVAL, called Kothe Distilling Technologies. We teach workshops, we represent many manufacturers of distilling equipment for craft distilleries, and we also promote using organic materials. We have taught a lot of people how to use our technique and create their own unique style, so now a lot of distilleries, especially craft distilleries, have started to promote the use of only the heart cut, which is something that Robert and I pioneered. Through our workshops we have now educated about 3500 people from all over the world. We have also helped set up 160 distilleries in the US and Canada over the last eight years.”

“Another way that we distinguished our distillery was by using unique alternative grains. Most distilleries in America, prior to the craft revolution, used a lot of the usual grains-rye, wheat, malted barley and corn. All wonderful grains with their own flavor, but we also wanted something slightly different, so we wanted to use other grains like millet, oats, and spelt to highlight how different grains can also add really unique flavor profiles that people never had an opportunity to try, maybe even one that could become an American favor-
ite. Our bourbon, for example, is corn and millet- the only one on the market that uses such a unique mash bill. It’s also one of our best sellers worldwide,” said Sonat.

“We currently have 23 full time employees and about that many more working part-time. Some of our full time people are working abroad, two in Europe, one in Japan, and a part-time person in Australia. They primarily work in sales and marketing. Liquor is sexy to be honest, so there are a lot of people who want to work in the distilling industry, particularly since it is a rapidly growing industry. Individuals with a lot of training have no problem finding jobs because there simply are not a lot of people with experience doing this kind of job. There are a lot of people in the brewing world, because home brewing is allowed in the US, but home distilling is not, so there are not many opportunities to learn how to distill unless you work for a distillery. We have interested people all the time, but it has been up to us to train them. In fact, most of the distilleries in the Midwest have benefited from our employees because they have moved on to work for other distilleries, even our former interns have become full-time distillers or master distillers for other distilleries. With some knowledge in this industry you can go a long way. We take training very seriously, and we have a German model where you are learning on the job from a master distiller. All of our staff, even the office staff take our classes so they all understand what we do.”

“Robert and I are very ambitious individuals, although we focus on the day to day, we’re goal oriented - the journey is the goal. Although it started with just Robert and I and our son in a Pack ‘n’ Play, it all grew organically. We’re completely family owned and operated. A lot of the other craft distilleries that started around the same time we did have sold to much larger companies. We’ve said no to acquisition. We don’t have any investors. We have done all this very carefully ourselves. It started locally, then regionally, then nationally, and now internationally. We are now probably one of the most widely distributed American craft distilleries. We’re available throughout Europe, Japan, we’re in South Korea, we’re in Taiwan, we’re in Australia, New Zealand, the Philippines, and almost all of Canada. We have plans to enter China and Thailand in 2018,” noted Sonat.

“We are not just marketing our products. We believe in creating the highest quality spirits we can, and we do that by design in every way, whether that is the equipment that we use, our method for distilling using only the heart cut, and our use of only the best organic grains we can find. That is our agenda. One can talk about marketing, but it’s really about having extremely high quality, and luckily, that appeals to people.”

To learn more about KOVAL Distillery, visit: http://www.koval-distillery.com/

To learn more about Kothe Distilling Technologies, visit: http://www.kothe-distilling.com/

of its clients each year. An unannounced inspection is exactly what it sounds like - an inspector will show up on your doorstep with little or no warning. The inspector won’t expect to be able to complete a full inspection - he or she will typically review a predetermined piece of your operation, and unless we discover a noncompliance, there is no fee or cost for an unannounced inspection.

We find that some of our clients get very nervous about an inspection, while others welcome it as an opportunity to learn and grow. I’d like to encourage you to try to adopt the latter attitude; we don’t go into inspections with a “gotcha!” mentality; we’re reviewing your operation based upon the information you provided in your organic system plan, and we hope for the very best for you.

However, I get it - MOSA is not exempt from inspections jitters. As an accredited certifier, MOSA is required to have an annual audit, and every 30 months the NOP sends staff to perform a week-long audit. And yep, we get nervous about it, too. Probably the same as you, we don’t anticipate that we’re going to have any problems in our audit, but it keeps us on focus and serves as an opportunity for us to (re)evaluate our operations.

An audit of a certification agency looks at how we apply the organic Standards in certification decisions; how we hire, qualify, and train staff to make certification decisions; what our audit trails look like; how decisions are documented; timelines; what training and educational resources are available to staff, etc. All of this ensures that we are operating at the highest level, and that all certification agencies are interpreting and applying the National Organic Program requirements in the same manner. This allows us to focus on continuously improving our processes and systems which in turn is a benefit to the organic community as a whole.

**Annual Update.** We’re already hard at work on planning our 2018 schedule. This year, we adjusted the due date for clients to return their annual updates to MOSA, making it April 1, a full 90 days earlier than in the past. This went well; the earlier date allowed us to complete initial reviews and assign our client files to inspectors sooner than in past years. Our inspectors appreciate this increased efficiency as it allows them to better plan their inspection season. So mark your calendar - we’ll be doing it again in 2018. Annual updates to your organic system plans will be due April 1. The Early Bird deadline to receive a discount on your annual fees will be February 15. There will be some other changes to fees and discount. Along with the Early Bird discount we will offer a discount for full annual payments received by the Early Bird date. You will also notice a slight increase in our fees; we implemented our current fee structure in 2013 and haven’t changed it since then so after careful consideration we made the decision to do this. We understand that this is not something anyone is ever happy to hear, but we hope that this is not completely surprising to you and that your Cost Share reimbursements will help offset this.

As always, if you have any questions or comments about anything in this newsletter or about MOSA please feel free to contact me at cskolaski@mosaorganic.org or 608-637-2526. Thank you for reading, and thanks for your continued commitment to organic integrity.
CERTIFICATION POLICY UPDATE

Jackie DeMinter, Certification Policy Manager

Organic Livestock and Poultry Practices Rule Update! November 14th, 2017 is right around the corner and there has been little to no news about the rule. The Organic Trade Association’s recent lawsuit against the U.S. Department of Agriculture over its failure to put into effect new livestock standards could perhaps initiate some action. The lawsuit alleges the USDA has unlawfully delayed the effective date of the final rule, a final rule that was developed through proper process. The OTA also contends the Presidential regulatory freeze order should not apply to the voluntary organic standard. Visit the OTA website at www.ota.com to read more about the lawsuit.

As you recall, we are waiting to hear the USDA’s decision on the second proposed rule which offered four options:

(1) Let the rule become effective. This means that the rule would become effective on November 14, 2017.

(2) Suspend the rule indefinitely. During the suspension, USDA could consider whether to implement, modify or withdraw the final rule.

(3) Delay the effective date of the rule further, beyond the effective date of November 14, 2017.

(4) Withdraw the rule so that USDA would not pursue implementation of the rule.

Over 47,000 comments were submitted and almost all were in support of the rule moving forward on November 14, 2017. In our comments, we offered strong opposition against further delay of the effective date and implementation of the Livestock and Poultry Practices (OLPP) final rule. We fully support option one and feel that choosing any of the other three options would be a missed opportunity to strengthen our industry. At MOSA, we’ll continue our work for a November 14th effective date. Watch for updates from us.

Sewage Sludge Reminder. Remember that human waste and sewage sludge are prohibited for application on organic land. If you are having your septic pumped or are disposing of other waste, be sure to do so in an area buffered from organic production. In all cases where human waste has been applied to organic land, the land must be suspended from organic production for three years. Cropland application of human waste is also a food safety concern.

Update to residue testing policy for Quaternary Ammonia compounds. Do you use quaternary ammonia on your operation? If so, please take note of the updates to our policy. Since quats are designed to leave a persistent residue, the operator must be able to show MOSA through residue testing that the intervening event removes all residues. MOSA now requires that tests be sensitive to a 0-10 ppm range and the results must be 0 ppm. The type of test and sensitivity must be described in the Sanitation section of your Handler Organic System Plan. Residue testing does not need to be done each time if the standard operating procedure (SOP) has been proven to be effective, however you will need to use periodic testing to monitor. Ensure your tests clearly show a residue of 0 ppm. Inspectors will be verifying that testing protocols are adequate and clearly described in your organic system plan.

Materials review policy updates! Late last year, the NOP published NOP 5034-1 Materials for Organic Crop Production and since then we’ve assessed all of the categories of materials outlined in the guidance document and are working to update our policies and individual product reviews. What does this mean for you? Some of the materials that we have previously approved for use on your operation may now require additional information from you for review. Some decisions will also change from allowed to prohibited or additional restrictions may apply. If any of the materials in use on your operation are impacted by any changes, we’ll notify you during review. Clients using inputs that are no longer going to be allowed will be required to discontinue use of the input.

At MOSA, we also have been reviewing appropriate sanctions related to both deliberate and unintentional use of prohibited inputs (including unfortunate chemical drift situations). We continue to require all inputs to be approved as a part of your organic system plan. We are happy to review proposed inputs before they are used. Use of prohibited inputs is not compliant with the standards, and can affect your certification. (More details are in NOP Program Handbook Instruction 4002.) More information may be requested for the following generic materials:

- **Acetic acid** - We will be asking for verification that the acetic acid is natural (produced through fermentation) and is nonGMO.

- **Biodynamic Preparations** - We regret to inform you that any preparations containing manure will be restricted unless the manure is fully composted. This includes horn manure. MOSA has not previously applied the 90/120 day manure restriction to biodynamic preparations.

- **Humates, Humic Acid, and Fulvic Acid** - Humic acid is derived from Leonardite, lignite, and coal. We will need to verify naturally occurring deposits only, and also any extractants used. Humic acid may be extracted with water or alkali extracts (for example, potassium hydroxide, sodium hydroxide, or ammonium hydroxide) and only in the amount necessary for extraction. Fortification of the product is not allowed. Fulvic acids are the fractions of humates soluble at neutral to acid pH. Fulvic acid may be extracted from humates with water or nonsynthetic acids. Alkali extractants are only allowed for use to extract humic acid.

- **Hydrolyzed ingredients** - We will now verify the process used to hydrolyze the material. Steam, heat, enzymes and pressure are allowed. Synthetic chemical acid or base hydrolysis results in a synthetic material and is therefore prohibited.

- **Molasses products** - We’ll now be asking for verification to ensure that the molasses does not contain any synthetic scale inhibitors, aggregation and precipitation agents, or additives to control fluidity, all common ingredients added during nonorganic molasses processing. We are actively working with manufacturers directly to update our reviews of the molasses products recorded in our database.

- **Mulch** - Plastic mulch must be petroleum based and not be polyvinyl chloride (PVC). Biodegradable plastic mulch is not covered under the plastic mulch allowance. We have previously allowed biodegradable mulches as long as it was removed prior to breaking down. The new listing for Plastic Mulch states: “The allowance does not include biodegradable plastic” which makes it the policy clear. Clients will be required to discontinue use.

- **Mushroom Compost and Spent Mushroom Substrate** While not a change, we’ll remind you that we need to verify all materials in the compost or substrate, and all must be derived from allowed materials. Materials that contain manure are subject to timeframe restrictions for raw animal manure unless they are composted before or after mushroom production according to § 205.203(c)(2) or NOP 5021 - Compost.
and Vermicompost in Organic Crop Production.

- Paper / Other Recycled Paper - Our review of paper products has not changed yet, but we are seeking clarification from the NOP. Their listing states: "Includes newspaper and other recycled paper such as cardboard, without glossy or colored inks. Does not include paper that is not recycled (i.e., virgin paper)." To date, we have not verified that all paper products we’ve allowed are composed of 100% recycled paper. We are asking for a clarification regarding what types of paper products are included and what composition must be recycled. We'll update you as we know more. Anticipate that we'll need more information on paper products in use on your operation.

Plant extracts and oils - We are now more thoroughly verifying that the extraction process is a natural process. Extracts from plants are considered nonsynthetic/natural if they meet the below three requirements and are not "exceptions in the National List:

- At the end of the extraction process, the material has not been transformed into a different substance via chemical change.
- The material has not been altered into a form that does not occur in nature;
- Any synthetic materials used to separate, isolate, or extract the substance have been removed from the final substance (via evaporation, distillation, precipitation, or other means) such that they have no technical or functional effect in the final product.

*Note that some extracts are listed on the National List with specific annotations, for example - nonorganic gums may only be extracted with water, and aquatic plants may be extracted with materials as noted in the annotation.

FARMING DECISIONS, INSURANCE CLAIMS, ORGANIC INSPECTION EASIER WITH WELL-KEPT RECORDS

By Harriet Behar

While recordkeeping is not among the top 10 best things about farming, keeping good records can provide significant benefits to farmers and ranchers. Having a historical perspective of the planting dates for each field, correlated with information on various crop yields, is invaluable in planning crop rotations from year to year. Tracking fertilizers and soil nutrient amendments and the crop responses to those inputs over time pinpoints which inputs offer the most bang for the buck. When you have your own records, you know how late you can plant a specific crop and still get acceptable yields. You also have the information you need to develop different crop rotations by soil type and location on the farm, and can choose when to harvest a crop, such as taking corn silage instead of letting the corn grow to maturity.

Organic certification requires good records so the organic inspector can verify that you are doing acceptable activities—those records represent a functioning organic system on your farm. Organic farming relies on good management rather than synthetic inputs.

Good records serve as an economic safety net if things do not go as planned. If a prohibited pesticide drifts to your field from a neighboring farm, utility crew, or aerial sprayer, your records are invaluable in obtaining a financial settlement from the operator who chemically trespassed on your farm. Your field records have your specific crop yields and sales records to prove the dollars received. Your yearly field histories illustrate the crop rotation and the organic crop sales you will lose for three years if the field becomes ineligible for organic certification due to their negligence.

Farmers who are in negotiation with insurance companies representing the entity that caused the drift have said those agents have a hard time arguing with the documented information in the organic records, and usually are surprised at the price difference between organic and non-organic commodity or specialty crops. Not only have those records been kept over time by the farmer, but they are “audited” and verified on an annual basis by a third party recognized by the U.S. government—an accredited organic certifier. Having all of these records, in a format that’s easy to review and copy, makes the negotiations go much smoother and can result in a more speedy and acceptable outcome for the farmer.

MOSES, with funding from the USDA Risk Management Agency, has put together a workbook containing a variety of crop recordkeeping forms. These forms include the essential information an organic inspector will need to see, as well as the information you need to provide when you make a claim on your crop insurance plan.

The workbook includes multiple copies of each form—fill out the forms this year, then if you like using them, you can photocopy the blank forms for subsequent years. If you prefer to work electronically, you can download the forms as Excel spreadsheets—they're all online at: https://mosesorganic.org/publications/farm-production-recordkeeping-workbook/

“I really like it—the crop rotation plan sheet especially is very useful,” said Cullen Carns-Hilliker, the MOSA organic inspection manager, who reviewed the recordkeeping workbook. “It is easy to see how many years of a certain crop have been grown in each field, and even prompts farmers to remember to include their cover crops. MOSA offers many recordkeeping forms, but we do not provide field activity log templates, nor sales records, making this book a great option to point people towards what is necessary for a full recordkeeping system.” He added that both those new to organic certification and experienced organic farmers will find these forms valuable in closing up the holes they may have in their recordkeeping system.

Whole Farm Revenue Protection crop insurance relies heavily on the information on the Schedule F of your federal tax return. The recordkeeping workbook has templates for tracking that information as well, making your yearly tax filings much easier to do, whether you do them yourself or hire a tax preparer complete your federal taxes.

For individual commodity crop insurance—no matter if the crop’s organic, transitional, or conventional—you need to be able to prove to the insurance adjuster you have done your due diligence in growing the crop, even if it has been shredded by hail or dried up by drought. The five-year field activity log lets you track by field, bed, or section of field for up to five years on one page. This form tracks fertility, pest and disease management, crop and cover crop management, which makes your field histories illustrate the crop rotation and the organic crop sales you will lose for three years if the field becomes ineligible for organic certification due to their negligence.

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REASON AND PASSION: THE MATURING OF ORGANIC VALUES

Stephen Walker, MOSA Operations Manager

Over recent months, we’re doing a lot of thinking about MOSA’s organizational mission, vision, and values. In strategic planning work, we realized that while we had a solid mission statement - “We promote organic integrity through practical, reliable, and friendly certification services” - and had solid values expressed in our daily work, we’d never formally named our values. So, we brought the discussion to our full staff, which brainstormed a list of over 100 values words. We then drilled down to common themes, and defined our vision, our ideal state future state, which articulates what MOSA is trying to accomplish. That vision is “a thriving organic world.” And, we named our values, four basic principles by which we operate:

Service - Outstanding customer service and MOSA's leadership within the organic community are vital tenets of our work.

Relationships - We value human connections and ethical interactions.

Quality - We believe that integrity, professionalism, and practicality lead to sound certification decisions.

And, Optimism - 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.

Since our start in 1999, MOSA has always been a valued voice in local and national discussion about the development and direction of our National Organic Standards. Our organizational vision and values, even unnamed, have been put to the test over many years. That continues. Lately, many news articles - some very hopeful, some critical - have us rethinking how organic should best continue to thrive. In 2016, organic sales in the US were about 47 billion dollars. Our movement has grown into an economic engine. We understand organic’s ability to give life, to help solve global crises. Yet in our maturation, we face new, competing challenges in enforcement, adaptability, defining boundaries, and retaining our principles. We value innovative spirit even as we are connected to an agricultural history dating back thousands of years. We recognize that organic integrity and success depends on a strong National Organic Program. The Program improves, but struggles to keep pace with development of the industry. (More on that, in a bit.) Some of the debates in our community are perennial, such as, “Is increasing market share for organic better?” Or, “Where should we draw lines?” The most viable answers find a sound balance between reason - regulations, statistics, logical arguments, etc. - and the deep passions on both sides of a debate. Organic conversation embodies being alive.

Each spring and fall, we provide written and verbal feedback to the National Organic Standards Board (and, we encourage you to join in). I’ll be representing MOSA with testimony at the NOSB meeting in Jacksonville, FL, 10/31 to 11/2/2017. These meetings may be the best place to witness organic grow, and to consider our reason and passion. A full 177 pages of Fall NOSB meeting proposals and discussion documents can be found on the USDA website (www.ams.usda.gov). It’s an interesting agenda. Here’s some of what’s growing:

Proposal: Eliminating the Incentive to Convert Native Ecosystems to Organic Production - This aims to strengthen the General Organic Production and Handling Requirements. Standards §205.200 requires operations to “maintain or improve the natural resources of the operation, including soil and water quality.” Our standards define “natural resources of the operation” as the “physical, hydrological, and biological features of a production operation, including soil, water, wetlands, woodlands, and wildlife.” “Organic production” is a “system managed to respond to site-specific conditions by integrating cultural, biological and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.” As we think holistically and globally, we have new perspective on the interface between organic operations and the resources that surround them. It’s proposed to add a specific prohibition (at §205.200) so organic operations don’t convert fragile, important native ecosystems for crops or livestock use.

Proposal: Excluded operations in the supply chain - This defines limits for uncertified organic product handlers. The NOSB recommends the National Organic Program changes their guidance (NOP 5031): to clarify that exemption from required certification only applies to packaged, labeled product; unlabeled, unenclosed produce handlers in a non-retail environment must be certified; to provide additional examples to show when certification is required; to provide additional supply chain auditing training; and to assess our auditing as a part of certifiers’ accreditation.

Proposal: Strengthening the Organic Seed Guidance - We’ve weighed in on this one, a lot. This proposal affirms that “seed is much more than just an input. It is the fundamental starting point for transforming agriculture through nutritious ecologically grown food, feed and fiber, especially when coupled with the principles behind organic production of building healthy soils, using non-toxic inputs, and stewarding natural resources and the environment.” The proposal also acknowledges frustration at slow progress towards full adoption of organically grown seed. Many changes are proposed to §205.204 (Seeds and planting stock practice standard) and to NOP 5029 Guidance on Seeds, Annual Seedlings, and Planting Stock in Organic Crop Production. Improvements address: crops at risk from GMO contamination; organic seed usage as an Organic System Plan “goal;” continuous improvement; documentation of quality, quantity and equivalent variety; handlers supplying seed to contract growers; an Organic Seed Finder; and certifier and inspector training.
Proposal: Hydroponics and Container Growing Recommendations - We’ve discussed this issue at length. Suffice it to say, it’s brought our values to the test, with debate about soil as intrinsically organic production, alternative production systems, food security and conservation issues. The proposal is to prohibit hydroponic, aeroponic and aquaponic systems from using the organic label, and says that for container production to be certified organic, a limit of 20% of the plants’ nitrogen requirement can be supplied by liquid feeding, and a limit of 50% of the plants’ nitrogen requirement can be added to the container after the crop has been planted. For perennials, the nitrogen feeding limit is calculated annually. Transplants, ornamentals, herbs, sprouts, fodder, and aquatic plants are exempt. Related, a Field and Greenhouse Container Production document asks for feedback on artificial light, synthetic mulches, and disposition of by-products of container operations.

Livestock inputs - A clarification on “emergency” for use of synthetic parasiticides in organic livestock production offers language for addition to §205.238(c)(4), outlining a graduated emergency treatment approval process. A number of materials due for sunset review are proposed to be re-listed as allowed for organic use, but, oxytocin is proposed to be removed, and the future of procaine is uncertain. Sulfur is proposed to be added as a livestock parasiticide.

Participation in NOSB discussions forces us to check our values, define our boundaries, and sometime to also see our weaknesses, as we hear the perspective of others. The hydroponic debate is a great example. Some stakeholders are speaking with passion about a need for organic to look toward future food security needs, to adapt to enable water-based systems into our Standards. Others are adamant that organic, by definition and principle, must be based in the soil. Others are open to allowance of hydroponic systems, but would first require specific applicable standards. Though there’s passion backing all perspectives, folks seem to understand the reasoning of those with a different view. It’s good democracy.

So, let’s get back to that comment about our Standards keeping pace with changes. Sometimes we move too quickly into new territory; other times we’re too slow to adapt. Standards development is a very deliberative and transparent process. It takes time. And sometimes that pace causes strife and harm to our label, such as when the NOP is too slow to adopt NOSB recommendations, or when innovation gets ahead of our ability to reasonably regulate it. Examples include hydroponics, organic livestock and poultry practices (OLPP) rule implementation, and defining boundaries around new GMO technology. Maturation can be bumpy, but we continuously improve.

Sometimes we release a policy, and the target moves. This happened over the summer. In July, we announced our Import Grain Policy, to prevent fraudulent organic imports. With new NOP instruction, we’ve revised that Policy. It now applies to MOSA-certified operations that directly receive imported organic corn, soy, edible dry beans, wheat, flax, or sunflower meal from Kazakhstan, Moldova, Romania, Russia, Turkey, and Ukraine. We require full traceability back to the last certifier in the supply chain, sample and residue testing for each shipment, unannounced inspections, and reporting requirements. The revised policy is available on our website.

And there are those who, though they may want the best for the organic label, have a passion that outpaces the Standards’ reason. So, they push for requirements that are - dare I say - “beyond organic.” That term bothers me, even when I can relate to the passion. A piece of balance I like about our organic regulatory process is that while we set achievable, sound requirements, our underlying values and passion pull us along to want to do better. Going beyond the standards is encouraged, but not by disowning organic.

My personal organic principles were tested as I attended Natural Products Expo East, in Baltimore, in September. One afternoon I came across a big hullabaloo that pulled at my heartstrings but pushed my NOP Organic certifier buttons. A crowd gathered to hear about a new Regenerative Organic Certified Standard put forth by the Rodale Institute. This standard starts with NOP organic, and additionally reels in animal welfare, social fairness, and additional regenerative requirements, which increase soil organic matter over time and sequester carbon in the soil. While I’d heard a Regenerative definition was in development, I was surprised by how far it had come along, and I found my passion at odds with my reason. On one hand, since coming into organic work over 25 years ago, I’ve been most driven by carbon cycles and soil building as a solution to global urgencies. I agreed with something John Jeavons said in his keynote talk at the MOSES Organic Farming Conference a few years ago, “Organic is a step in the right direction, but we gotta keep on walking.” On the other hand, I’m wary of more label confusion, and I mostly see our NOP Organic Standards’ “maintain or improve” language as sufficient. In a recent post to the Accredited Certifiers Association, I wrote, “Perhaps §205.200 and 205.205 are sufficient regulatory tools to enforce meaningful impact on natural resource conservation and improvement, atmospheric carbon, regeneration of soil, and so on. But, maybe not, and some folks are seeking something more impactful. I’d like to see us all do better, somehow, and hope that NOP Organic can be a viable solution. I assume that such progress will take a combination of enforcement with a hammer, and a qualitative/ethical appeal more like a carrot.”

MOSA’s Sara Tedeschi gave some perspective from her previous work with a big organic company, and acknowledged her own mixed feelings. “They were pretty down on ‘additional labels’ and felt strongly that we all need to pull together (with consumers, too) to make the National Organic Standards what we really want them to be and live up to the original vision as much as possible (with continual improvement). But that was some years ago and given the stutter steps with the LPP rule and the fact that the NOP is not agile enough to respond to mounting concerns, I wonder if they are more in support of these ‘beyond organic’ certification and labeling efforts? I am on the fence. Like you, I think the (re-)focus on soil health, social justice and animal welfare issues is so critical (more publicity the better, in some ways), but...
LIVESTOCK FOR SALE

BELTED GALLOWAYS
Michael and Lorna Caldwell of Caldwell Farms, Milladore, Wisconsin, are selling a portion of our certified organic grass-fed Registered Belted Galloway herd with unique genetics comprised of 150 belties (including 50 pregnant cows and heifers). All belties DNA tested for parentage and tenderness ratings. Visit our website www.beltiebeef.com. Please call Lorna at farm: 715-457-6765, cell: 715-207-9745 or email us at belties@caldwellfarms.com.

COWS & HEIFERS
Five 2nd calf cows, and nine 1st calf cows in various stages of lactation. Also for sale, ten springing heifers due October through February. Call for pricing. Will split up animals. Located near Clare, Mich. Call Wayne at 989-588-1610.

HEREFORD HEIFERS
Horned Hereford heifers for sale. Four-three year olds; Two-two year olds; and Seven-yearlings. Fed grass and hay only, on and from our certified organic ranch. All were treated once with Cydectin at weaning otherwise no other medications. Decorah, Iowa. Contact Israel D. Swarey, N83 Hall Drive, Stetsonville, WI 54480.

REGISTERED HOLSTEIN BULL CALF
Polled, Registered Holstein bull calf. 8wks old.

HERD BULL
Red Devon Herd Bull. Great proven sire (7 years). Good structure and thickness. Also for sale, 2 year old Red Devon Bull, a 14 month old Red Devon bull, and five cow/calf pairs. Freezer beef and grass finished steers available, all 100% grass fed. Witzig Organic Farms, Gridley, IL. 309-747-2423.

CUSTOM HEIFER RAISING
Will custom raise your organic heifers. Feed provided. Call for more details. Located near Lewiston, MN. Call Matt at: 507-459-7719.

RED DEVON BULLS, COWS & HEIFERS
We are selling Red Devon Bulls, Red Devon and Red Angus bred cows and bred heifers. We also have freezer beef & grass-fed steers available- all 100% grass-fed. Witzig Organic Farms. Gridley, IL. 309-747-2423.

LAND/FARMS

CRAWFORD COUNTY WI RIDGETOP FARM
82 acre MOSA certified Crawford County WI ridgetop farm for sale: 3 bdm ranch home with gas furnace and wood furnace. 8 stall horse barn (6 box, 2 tie) and tack room, horse run-in shed; 24x60 machine shed, fenced food garden. About 40 acres tillable currently in hay balance pastures, hardwoods and meadow. Wildlife and small pond. On quiet gravel township road off state highway. Will divide. Call 715-781-1171.

EQUIPMENT

HINIKER 5000 6-ROW CULTIVATOR
II & J CROP ROLLER 15 ft. 3 pt hitch, like new, $4900. Westby, WI. 608-606-5353.

30 FOOT DIAMETER CIRCLE BIN

CUSTOM BUILT BATCH BOTTLE WASHER

DAIRY BARN EQUIPMENT
Sixteen 16"x8' gutter grates. Home-made, very heavy built. $150 each. Fourteen Freudenthal arch style tie stalls. $25 each. Eleven Freudenthal freestall loops. $35 each. 24 Surge One Touch Pulsators. One with readout and three without. Call for price. Cashoton, WI. 608-462-3006.

MISCELLANEOUS

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

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

VEGETABLES/TRANSPLANT/SEEDS

ORGANIC PUMPKINS AND SQUASH-
Organic pumpkins and squash. Delivery available in the Rochester, MN area. Call for pricing. (507) 696-0270 or (507) 272-9420.

ORGANIC GARLIC
Certified organic garlic. Chestnut, German Red and Romanian varieties available. $10-12 per pound depending upon bulb size. La Farge, WI area. (608)606-4441.

ORGANIC GARLIC SEED

ORGANIC GARLIC STOCK
MOSA Certified Organic Garlic Seed Stock. Variety: German Extra Hardy. Large- $10 per pound. Medium- $8 per pound. Plus shipping. Contact Israel D. Swarey, N83 Hall Drive, Stetsonville, WI 54480.

WINTER RYE SEED

FORAGES/GRAINS

ORGANIC GRASS HAY
Organic Grass Hay. Approx. 250 small square bales from 2016. $2.50/bale. Approx. 635 small square bales from 2017. $3.00/bale. Located south of Brooklyn, WI. Contact Dennis. 608-416-0364, or dennis@inpaksys.com.

SPELT STRAW
Small square bales of clean spelt straw. Certified organic. $4.50 a bale. Contact Levi A. Hertzler, 3164 Draper Road, Dorchester, WI 54425.

RYE STRAW
Organic large round rye straw bales. 4' rounds- approximately 1400 lbs. Call for pricing. (507) 696-0270 or (507) 272-9420. Rochester, MN.

ALFALFA/GRASS HAY & OAT STRAW
2017 Organic Hay Mosa Certified Alfalfa grass 1st crop squares 3+3 8 2nd crop wrapped in rounds 4+. Organic oat straw squares 3x3x8. Call Milton @ 608-921-3765 for more info.

2017 ORGANIC CORN

1ST CROP ORGANIC HAY

ORGANIC BARLEY STRAW
Organic barley straw. 125 small square bales. Virtually weed-free with no rain. Delivery possible. La Farge, WI. Call/text 608-639-0090.

ORGANIC BARLEY STRAW
Most recently I began work for MOSA in December of 2016, however was really different when you started?

The abundance of food with friends, neighbors and food banks.

I also love to share the fruits, vegetables and herbs I have grown. I also love to share the increasing number of perennial fruits and nuts. I love food preservation available. 608-553-1136.

I live on my family’s farm south of Viroqua, WI in a tributary valley. What do you do with your time outside of MOSA?

As a Certification Specialist, I also work as part of our customer service team. We work on a daily basis directly with clients to answer a wide variety of questions, including reviewing inputs that are requested for use in their organic operations for compliance with the National Organic Standards.

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

I work on a daily basis directly with clients to answer a wide variety of questions, including reviewing inputs that are requested for use in their organic operations for compliance with the National Organic Standards.

**Why MOSA?**

I feel fortunate to work for a local organization, but one that has national and even international influence on the evolution of the industry. Also, MOSA’s commitment to its own internal, continual improvement also means that staff as individuals are supported to continually grow, learn, improve and engage in both the organization’s and the certification industry’s programmatic growth, as well.

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

My lifelong love of agriculture stems from having lived so long in southwestern Wisconsin, where over my lifetime I have watched and participated in the explosion of organic farms, illustrating the values of land stewardship that I believe have long been rooted in the rural and farming culture of this region. A great thing about my life is simply being part of this agricultural landscape and the communities that choose, support and promote organic and sustainable lifestyles.

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<th>ORGANIC SHELL CORN</th>
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<td>MOSA certified organic shell corn. 54-57% test weight. 3500-4000 bu available- $8.75 bu obo. Holy Cross, IA. Call 563-542-1254.</td>
<td>2017 organic wheat and barley straw. MOSA certified. 3x3x8 large square bales. Wonewoc, WI. Transportation available. 608-553-1136.</td>
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**COMMERCIAL ELECTRIC WEEDER FOR RENT:**

Kill weeds, and do it without chemicals – electrocute them. Rent an electric weeder from Quality Organic Producers Cooperative. You drive your tractor through the field with the weeder hitched behind. The weeder generates electricity and puts 15,000 volts into a boom suspended above your crop. When a weed that is taller than your crop hits the boom, electricity passes through the weed and into the ground. On the way it kills the weed, root and all. The weed is crumpled on the ground when you make the next pass. Call 563 532 9431 for more information.

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.

**MOSA EMPLOYEE SPOTLIGHT: SARA TEDESCHI**

What do you do in your position at MOSA?

I am a Certification Specialist for MOSA, which means I spend the majority of my time reviewing files for our clients. Prior to the inspection season, certification staff do what we call an Initial Review of a file in preparation for the next step in the process, the annual inspection. We communicate with clients about anything that must be accomplished before or during the inspection and what records they should have available for their inspector. After the inspection season, I conduct Final Reviews, where I make certification determinations and issue certificates, providing requirements have been met. As a Certification Specialist, I also work as part of our customer service team. We work on a daily basis directly with clients to answer a wide variety of questions, including reviewing inputs that are requested for use in their organic operations for compliance with the National Organic Standards.

What do you do with your time outside of MOSA?

I live on my family’s farm south of Viroqua, WI in a tributary valley of the Mississippi. As a past diversified vegetable grower, I am hooked on food production and continue to maintain large gardens and an increasing number of perennial fruits and nuts. I love food preservation, and in the fall most every spare minute is filled with processing the fruits, vegetables and herbs I have grown. I also love to share the abundant food with friends, neighbors and food banks.

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

Most recently I began work for MOSA in December of 2016, however I also worked for MOSA when it first began in 1999. I believe I was MOSA’s first Certification Specialist. I soon went on to help MOSA prepare for its first accreditation with the USDA which became final in 2002. After that time I continued to work with organic agriculture in other capacities, but not in certification work. I have come full circle and am tackling the steep learning curve of certification work all over again! So for me, most everything has changed about MOSA since I first began decades ago. The most positive change is the growth in wonderful staff and clients who make MOSA a dynamic and engaging place to work.

Why organic?

My mother, of course. My mother at 83 and father at 86 are still my gardening partners and inspiration. My mother particularly was a very early adopter, learning everything she could about organic gardening even before the word was widely applied to food or agriculture, back in the early seventies. I grew up helping grow, preserve and eat our organic vegetables and simply never stopped. Now my young adult children are following in the same footsteps and may already be better farmers and cooks than I am! As a family, we know that organic management of our farm is the key to the health of the land, wildlife and our own well being. We love participating in the cycle of care and renewal of this precious landscape where we are blessed to live.

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EVENTS

NOVEMBER 2017

WFAN Conference
November 02 - 04, 2017 | Madison, Wis. | $$$
Join more than 200 women from all areas of sustainable agriculture, including farmers, aspiring farmers, landowners, policymakers, and advocates. The conference includes field tours, on-site intensives, workshops, keynotes, special 20th anniversary presentations, and a locally sourced lunch. All are welcome; workshops include topics ranging from production and marketing to conservation, leadership development and policy issues.

Hand Tools and Implements for Small Vegetable Farms
November 05, 2017 | 2:00pm - 5:00pm | Iowa City, Iowa
At this “try before you buy” field day, Jason and Scott will show various hand tools and small implements, including wheel hoes, stirrup hoes, a BCS tiller and more.

Organic Transition for Commercial-Scale Farmers Workshop
November 08, 2017 | 8:30am - 4:00pm | St Louis, MO
In this workshop, farmers who are considering or just starting a transition to organic will have an opportunity to learn from key experts in the field of organics, and get to know other farmers who are transitioning to organic as well.

Fearless Farm Finances Workshop
November 10, 2017 | 9:30am - 5:00pm | Montour, Iowa
Learn farm financial management based on the book Fearless Farm Finances. Includes a copy of the book. Learn More

3rd Annual Organic Farming Conference
November 10 -11, 2017 | Mt. Hope, Ohio
Our upcoming 3rd Annual Conference will be on November 10-11, 2017 Now a 2 day event!

Pastured Pork Field Day
November 14 | Free | 10:30 a.m. | Viola, Wis.
Introduction to Pasture Pork & the newly forming Pastured Pork Cooperative.

17th Annual Iowa Organic Conference
November 19 -20, 2017 | Iowa City, Iowa
The Iowa State University Organic Agriculture Program’s 17th Annual Organic Conference will be held on the Sunday the 19th and Monday the 20th of November 2017 in the Iowa Memorial Union at the University of Iowa, Iowa City, Iowa.

Midwest Food Products Association’s Annual Convention
November 28-30 | Rochester, Minn
The 27th annual convention brings together leaders in the food processing industry to discuss trends, view new technologies, share expertise, and network with professionals in different companies and disciplines.

GAPs Online Course
November 29 – Dec 19 | $190 | Online
This course is intended to improve your understanding of GAPs to guide assessment of risks and implementation of practices to reduce risks on fresh produce farms.

DECEMBER 2017

Feast! Local Foods Marketplace 2017
December 1 – 2 | $5 | Rochester, Minn.
The award-winning Feast! Local Foods Marketplace hosts over 100 exhibitors who show, sample and sell their artisan food products to wholesale buyers during the Friday tradeshow and to consumers during the Saturday festival.

Webinar: Organic Poultry and Outdoor Access
December 5 | Free | 2 – 3 p.m. | Online
This webinar is presented in partnership with the USDA Natural Resources Conservation Service (NRCS)- Science and Technology National Technology Support Centers. USDA Organic Regulation create new outdoor access requirements for poultry. This webinar will discuss the new requirements (once finalized), potential resource concerns and opportunities for conservation.

Midwest CSA Conference
December 7-8 | $135 | Wisconsin Dells, Wis.
With the continued growth of the CSA movement in the Midwest comes opportunities and complexities. The conference will provide a forum for CSA farmers and advocates to come together for deliberative discussion and peer-to-peer learning. Full-group sessions, including a keynote, will discuss shared values of the movement and strategies for promoting cooperation and shared risk among farms and communities.

REMINDER

Organic Cost Share – Help with Organic Certification Costs
The USDA Organic Certification Cost Share Program (OCCSP) offers a rebate for organic certification costs and continues to accept applications for 2017. You may apply for your cost share rebate through either your local FSA office or your state Cost Share Program. The FSA application deadline is 10/31/2017. State Cost Share Program application deadlines vary.

Allowable certification fees and costs paid between 10/1/2016 and 9/30/2017 are reimbursable 75% up to $750 based upon the amount paid and categories or “scopes” of certification. Scopes include crop, wildcrops, livestock, and processing/handling.

For more information about Organic Certification Cost Share, including your local FSA or state contact information, or if you need a copy of the state cost share application, please call Lexy McManaway, MOSA Cost Share Coordinator, 608-637-2526. Cost Share information and state applications can also be found online.

We’re happy to help.
have grave concerns about circumventing the NOP and dis-empowering the USDA Seal. Consumers are fickle and distrust and disillusionment (whether real or perceived) is dangerous and can take a lot of re-education, resources and time to get the story straight."

The maturing of organic has always been about comparing current standards with new ideas, and seeking to do better. Recently, my reason and passion are both inspired by the many new writings about carbon sequestration and organic methods as a solution to climate change. This is right in line with MOSA's value of optimism. Using "Arlo Guthrie's Alice's Restaurant measure," if we find that more than three people are talking about something, it's a movement. How about we call this "the optimism movement?"

Parts of this optimism movement came to attention at Expo East in 2016, where Paul Hawken spoke on climate change solutions. Hawken helped to initiate Project Drawdown, a climate change mitigation project. To support the Project, he edited the 2017 New York Times bestseller, Drawdown: The most comprehensive plan ever proposed to reverse global warming. The book lists the "100 most substantive solutions to global warming." The list, encompassing only technologically viable, existing solutions, was compiled by a team of over 200 scholars, scientists, policymakers, business leaders and activists. For each solution they modelled and measured the carbon impact through the year 2050, the total and net cost to society, and the total lifetime savings. Of the 100 solutions, eight are agricultural, including regenerative practices.

Also in September, we saw release of new optimistic research on organic solutions to climate change. Northeastern University and The Organic Center released a breakthrough study providing significant proof that organic agricultural practices build healthy soils and sequester carbon. Doctors Elham Ghabbour and Geoffrey Davies, from the National Soil Project at Northeastern University, compared 659 organic soil samples from 39 states and 728 conventional soil samples from the 48 contiguous states. They found that ALL components of humic substances - comprised mostly of very stable, carbon-storing fulvic and humic acid - were higher in organic soils. On average, soils from organic farms had 13% higher soil organic matter, 150% more fulvic acid, 44% more humic acid and 26% greater potential for long-term carbon storage.

In another recent article, in Politico.com (Can American Soil be Brought Back To Life), Jenny Hopkinson calls it a soil health movement. By whatever name, it's not new information. It's a movement born from our values. What's new is how this sensibility is gaining traction.

In a recent MOSA budget discussion, we noted how financial efficiency is directly related to compliance with our standards. I considered ways we might help boost enthusiasm - heartfelt passion - for compliance. We have a very sound and improving organic standard, and we have deep organic principles that continue to inspire. As we mature, we are driven not so much by being told what to do, but rather by being pulled by what is right, by what works. Organic is already a gold standard, and it pulls us forward. I hope that your values call you to always do better.

In The Prophet, Kahlil Gibran put it well. "Your reason and your passion are the rudder and the sails of your seafaring soul. If either your sails or your rudder be broken, you can but toss and drift, or else be held at a standstill in mid-seas. For reason, ruling alone, is a force confining; and passion, unattended, is a flame that burns to its own destruction. Therefore let your soul exalt your reason to the height of passion, that it may sing; and let it direct your passion with reason, that your passion may live through its own daily resurrection, and like the phoenix rise above its own ashes."

A thriving organic world must have balance, indeed.■

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cont. REASON AND PASSION from pg. 7

The storage record was developed for commodity crops, but could be easily modified for long-term storage of specialty crops. This record notes fields where crops were grown, and provides a running inventory to help with sales and future planning.

Whole Farm Revenue Protection will cover economic losses due to lower market prices seasonally or annually. You can submit the completed sales record form from the workbook to show your crop insurance agent your historic sales figures. You can also use this completed form for your annual organic inspection to show your record of sales into the organic marketplace.

Lastly, if you plan to apply for a farm operating loan in addition to crop insurance, there is a worksheet provided to track an individual crop's expense and income over a five-year period. This can help with long-term enterprise planning, especially on diverse operations where choices are made each year regarding how many acres of each crop should be grown. This planning worksheet helps determine the net income per acre, which is useful when applying for crop insurance as well.

Having your documentation forms handy so you fill them in routinely will make them valuable assets for your farm. This new recordkeeping workbook gives you everything you need to keep track of your farming activities.

Harriet Behar has a certified organic farm in Wisconsin, and serves on the National Organic Standards Board.

This new resource from MOSES can help you track field information and more to make certification and crop insurance claims easier to manage.

https://mosesorganic.org/publications/farm-production-recordkeeping-workbook/