



the ORGANIC Cultivator

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INSIDE THIS ISSUE

LA CROSSE DISTILLING COMPANY	1
FROM THE DIRECTOR	1
NEW MOSA NON GMO LOGO	4
THINKING FORWARD, EMBRACING CHANGE	5
CERTIFICATION POLICY UPDATE	6
ROBERT CALDWELL RETIRES A LIFE DEDICATED TO INTEGRITY	10
CLASSIFIEDS	12

La Crosse Distilling Company

Farmer Forward, Driftless Pure, Genuine Wisconsin Spirit

Joe Pedretti, Editor

“We opened on September 1st of 2018. Our facility is located in downtown La Crosse. We have a robust tasting room that includes a full service restaurant with a large bar area for people who want to enjoy both food and crafted cocktails. Our cocktails include all of the spirits that we are making right there at the facility. It is about a 10,000 square foot building, a third of that is dedicated to the tasting room and restaurant, and the other two thirds are where we make our spirits,” noted Chad Staehly, co-founder of La Crosse Distilling Company located in downtown La Crosse, Wisconsin.

“We are currently operating two stills, a larger 1500 liter Kothe still, as well as a smaller 75 gallon Artisan still. We’re currently producing about 800 4.5 liter cases of liquor per month. Some of that is being barreled. We are aging some bourbons, whiskies and brandies, as well as producing clear spirits, which is sold under a brand we developed called Fieldnotes. Our Fieldnotes Vodka is 100% corn based and certified gluten free. We use organic midwestern yellow dent corn, sourced locally from Meadowlark



FROM THE DIRECTOR

Cori Skolaski, Executive Director

Welcome to Spring with its nice long days, planting, growing, greening, blooming... even though we are living through some game-changing times, I hope you are busy and productive time! April 1 was the due date for MOSA clients to submit their updated organic system plans and assorted paperwork; this year, because of all the uncertainty with the Coronavirus pandemic we extended the deadline but if you haven't returned your paperwork to us yet, please get in touch with us immediately so you don't incur any late fees and your certification continues without a hitch. And here's a quick reminder: MOSA must be informed in advance of changes in location, management, or any other significant changes to operations. If you don't let us know in advance of the changes, not only

see DIRECTOR on page 3



see DISTILLING on page 2

Organics, which is not too far away from here. We are also producing a Fieldnotes Gin, a new American style gin that is more citrus and herb forward. From time to time we produce some limited edition spirits for the tasting room, and some of those become distributed products like our High Rye Light Whiskey which is intentionally aged for only two weeks to allow the taste of the organic rye to come shining through with just a hint of oak.” “We offer three brands under our umbrella: La Crosse Distilling Co., Fieldnotes and Downtown Toodeloo . Downtown Toodeloo is a rock and rye whiskey that dates back to the nineteenth century when doctors and pharmacists would prescribe it as medicine. As the saying goes, ‘a spoonful of sugar helps the medicine go down.’ Distillers would add rock candy to the whiskey to sweeten it up. This is our version of that; we take certified organic Wisconsin maple syrup from B&E Trees in Viroqua, and then add organic oranges, lemon peel and some crystallized honey,” said Staehly.

“Currently all of our spirits are distributed throughout the state of Wisconsin and we have plans to expand as soon as the dust settles from the pandemic. Next up we’ll start distributing in Colorado, Minnesota and Illinois. One of the main principles we wanted to focus on was doing things right, not just focus on the bottom line.” “Our business was initially an idea from our partner Nick Weber, who is really the original founder and principal owner of the company. He formulated the idea of having a distillery here in La Crosse. Nick was born and raised here, has remained in the area for most of his life, and has a strong love and passion for the Driftless Area. He came up with the idea five or six years ago now, probably around 2014 or 2015. Mitchell Parr (Head Distiller) and I landed in his orbit about the same time. I was living in Colorado at the time, and Mitch was living in Chicago brewing beer for Lagunitas Brewing Company. The conversation started and we agreed that we all wanted to partner up to bring this all to fruition. We started creating the business plan and drilling down into the details. There was two to three years of planning prior to breaking ground. Mitch spent close to a year working on recipes. So in all, we did about 3-4 years of planning and creating the business plan.”

“We always knew that we wanted to create a model that was as sustainable as we could. We discussed being organic very early on. Land conservation was another important pillar for us. An inspiration for all of us is the renowned Wisconsin conservationist Aldo Leopold. We looked to his principles to determine how we wanted to proceed and engage farmers who would supply us with raw materials. About four or five months before we opened, we made the commitment to be a 100% certified organic facility and produce 100% organic spirits. We decided that although that commitment might box us in in certain ways, that we would make it work because that was really important to us to be treating the land as well as we could. We also wanted to showcase all of this amazing

organic farming in our region. It is one of the premier organic farming belts in the world,” emphasized Staehly.

“Our partner Nick Weber comes from a real estate development background and he had some experiences and success with alternative energy, so we made the commitment to tap into geothermal energy as an energy source for our facility. Here in the Mississippi River Valley you only have to drill down 50-60 feet to hit the water table, so you can tap into these geothermal energies. The studies we used showed that it would make economic sense for us to use geothermal, and of course, it fit into our philosophy of business. We even use geothermal to power the distilling process. We are the first, or one of the first, to utilize geothermal energy in the distilling process. We’re trying to be as sustainable as we can.”

“At first our plan was to build our facility outside of La Crosse in the countryside on agricultural land where we would grow our own organic crops. As we studied the options, we decided that it was too big of a project to start a farm and a distillery at the same time. A downtown location would make us more accessible to introduce ourselves to the public. We couldn’t find a building to retrofit, so we went



through the city to get some rezoning done to be able to build a facility like this. We got it approved and went forward with building downtown. There is a future plan to eventually move the bulk of our operation onto a farm, probably in partnership with some of our organic farmers,” explained Staehly.

“There was always a plan to include a tasting room and restaurant with the distillery. We had visited other craft distilleries throughout the region and we determined that the tasting room was key to the success of the business. It serves as a place to welcome people into the distillery where you can educate them on what you’re doing. In Wisconsin, we can sell our products right out of the tasting rooms, so it gives us a good retail outlet, which is a big help in bringing in some income that helps us to survive the initial start up years. When the city rezoned the property they wanted us to serve food. Initially we

were going to keep that pretty simple but as things developed, the food concept developed more, and then we realized that it fit in with our vision of being “farmer forward”, and we could work with farmers and purveyors from the region. Our chef and kitchen staff work directly with local and regional farmers to source as many ingredients as possible,” Staehly mentioned.

“Nick is the principal investor, and I (Chad) am also an investor. We put up the initial capital needed to get the loan. We took out a loan from a local bank, Citizens State Bank. They have been an amazing supporter, and are heavily invested in other local businesses here in town. They have been friendly to small businesses, which can be a challenge to find in the current landscape of banking and finance. As you jump into these projects, things change and scope changes and you run into problems. Nobody had any experience building a geothermal distillery, so we ran into some hiccups and additional expenses along the way, but we had the support we needed. Other than some increased expenses, things have gone pretty closely to plan. We are also supported by our partners Mitchell Parr who is our head distiller as well as Lee Berken who is head of sales. We plan to eventually create employee ownership of the business as well.”

“We knew we were on a tight timeline. Some distillery equipment makers with a high reputation, also had a very long build wait time, and were often pricier. We knew that we didn’t want something cheap and unreliable either, so we went for the balance of value and quality. We made a lot of projections about what products we were going to make and which ones might take off. We knew we wanted to do some clear spirits and some whiskies, so the equipment needed to be flexible for both,” explained Mitchell Parr, head distiller.

“The big hybrid still is made by Kothe (A sister division of Koval Distillery from Chicago) and is our workhorse at 1500 liters. We also have the 75 gallon artisan still, which we mainly use to make gin, so that gives us a lot of flexibility. I worked for Lagunitas Brewery, and was brewing for almost a decade. A

see DISTILLING on pg. 13

cont. DIRECTOR from pg. 1

are you not in compliance, but you also miss opportunities to receive guidance from us on the Standards. You may benefit from our institutional experience with having seen many such changes in the past.

We recognize that these unprecedented times make for challenging situations and MOSA staff have worked to develop processes and procedures to allow for flexibility; our priorities are the health and safety of our staff, clients, and communities. In response to the Coronavirus pandemic, we have been working from our homes since mid-March and will continue to do so until September 1; we are not open to the public or to walk-in clients during this time. We have the tech-

nology and training that will allow us to remain fully operational, and all of our email addresses, phone numbers, and mailing addresses have not changed. If you need to meet with MOSA staff, we can arrange to do so virtually - by phone, Google Meet, Zoom, etc. After September 1 we will reevaluate the situation.

We have been in continual communication with the NOP about its expectations. NOP staff are not waiving the requirements for in-person inspections of new operations, residue testing, and unannounced inspections, but they are allowing us to be innovative in the way in which we conduct annual inspections for our current clients. MOSA has and continues to explore technology that can make this possible, and we have instituted plans for four types of inspections - in-person, virtual, a hybrid of the two, and in some situations, we are allowing desk audits. Your inspector will discuss this with you when he or she contacts you to set up your inspection. Any in-person inspection will be done following all CDC guidelines for safety: social distancing, limiting the number of people at the inspection (ideally, two - the inspector and one site representative), conducting as much of the inspection outside as possible, wearing masks, etc. If you have any questions, concerns, or safety requirements, please let your inspector know.

Changes at MOSA. In February we implemented changes to our organizational structure. Kristen Adams was promoted to Certification Services Director and Joe Pedretti to Client Relations Director. Kristen now manages certification, compliance, and inspection staff, and Joe manages the administration and customer service departments. The benefit of this realignment was strikingly obvious when it became clear that the pandemic was going to drastically change operations; our new organizational structure functioned extremely well in helping us to respond to the changing landscape in a timely and efficient manner.

In other news, Dan Marten was recently promoted to Inspection Manager after long-time employee Cullen Carns-Hilliker left MOSA to explore other opportunities, and Kelsey Barale moved into the Inspection Coordinator position from certification specialist. And finally, Ben Caldwell was promoted to Certification Team Leader. We’re very excited about the experiences and fresh ideas that Dan, Ben, and Kelsey will bring to their new positions. Congratulations to Kristen, Joe, Dan, Ben and Kelsey! We have recently hired two new Certification Specialists - welcome to Jake Overgaard and Shannon Bly!

I sincerely hope you and yours are staying healthy. The Coronavirus crisis is going to change the way we do all things for a long time. That is now clear. But it is still our world and it is up to us to make the best of whatever comes our way; we’re in this together. As always, if you have any questions or comments about anything in this newsletter or about MOSA please feel free to contact me at cori@mosaorganic.org or 608-637-2526. Thank you for reading, and thanks for your continued commitment to organic integrity. Be well. ■

INTRODUCING THE NEW MOSA NON GMO LOGO

“The use of genetic engineering, or genetically modified organisms (GMOs), is prohibited in organic products. This means an organic farmer can’t plant GMO seeds, an organic cow can’t eat GMO alfalfa or corn, and an organic soup producer can’t use any GMO ingredients. To meet the USDA organic regulations, farmers and processors must show they aren’t using GMOs and that they are protecting their products from contact with prohibited substances, such as GMOs, from farm to table.”

(Organic 101: Can GMOs Be Used in Organic Products, Miles McEvoy, USDA)

Certified Organic operations are inherently non GMO. Unfortunately, this is not always clear to the average consumer, which is why a number of additional “non GMO” certifications have become popular in recent years. These additional non GMO certifications have their own fees, and require a separate audit and inspection. For already certified organic operations, this additional expense isn’t necessary. Certified operations have already been audited, inspected and verified to be non-GMO.

To help educate your customers about your non GMO status, MOSA has created a new MOSA Non GMO Logo. This new logo is free to use for any MOSA certified client. You may use it on labels, websites, marketing materials, or wherever you normally would use the MOSA logo to advertise that you are certified organic.



The MOSA Non GMO™ Logo Usage and Trademark Information

Clients who are certified by MOSA are also eligible to use the supplemental MOSA Non GMO logo on labels, packaging, websites, and promotional materials. The MOSA Non GMO logo cannot appear without the MOSA logo - it is for marketing and educational purposes only. When the MOSA Non GMO logo is used, it must immediately follow the MOSA Certified Organic logo (to the right) and must be the same size and color scheme as the MOSA logo. Neither logo may be altered in any way.

Example of the Logos with Proper Placement and Formatting:



Please note that the MOSA Non GMO logo is a marketing claim that is not affiliated with the USDA. If the MOSA Non GMO logo is used on product labels, it must comply with the rules set forth for logo use and labeling by the [USDA National Organic Standards](https://www.usda.gov/organic/organic-standards) and must be approved for use by MOSA.

The MOSA Non GMO logo is available in the same formats and color schemes as the MOSA Certified Organic logo (color, black, white, and color with white lettering).

The MOSA Non GMO logo is a trademark of MOSA Certified Organic (Midwest Organic Services Association) and is intended solely for use by our certified organic clients. All other usage is prohibited.

The new MOSA Non GMO Logo, and the MOSA Logo, can be found on the MOSA website at: <https://mosaorganic.org/logos-usage>. You can also email or call us if you need logo files or have questions about their use. Remember, that all label changes need to be approved by MOSA before you go to print.

THINKING FORWARD, EMBRACING CHANGE

Stephen Walker, Accreditation and Industry Affairs Manager

So, how's your 2020 going? These are interesting times, with rapid change. At the February MOSES Organic Farming Conference in La Crosse, WI, we gathered together as COVID-19 was gaining attention on the coasts. That same week, Natural Products Expo West, a major organic industry event, was cancelled. Many other events followed suit as the crisis moved from backdrop concern, to life changing. As we moved from our office to our homes, and various organic community meetings moved to online forums, MOSA worked with other certifiers to develop contingency plans for continuing our essential inspections and ongoing compliance verification. We saw a bloom of communications toward assisting organic producers, and heard a lot of talk about our "new normal."

National Organic Standards Board Meeting

Thinking forward is always part of NOSB work. In late April, MOSA joined upwards of 180 stakeholders as the NOSB held its spring meeting in a virtual format. We got a good view of what's needed as we look toward the fall NOSB meeting, in Iowa.

USDA Update

Bruce Summers, USDA's Agricultural Marketing Service Administrator, said some employees can work remotely, but most work on-site within the food system, collecting critical information. They're maintaining service while following safety protocols. In a novel approach aimed at fixing supply chain disruptions, AMS will purchase \$300 million of food, monthly, and collaborate on logistics to procure, pack, and deliver food to non-profits. AMS is also working across departments on CARES Act direct payments to all types of producers. In response to Summers' report, NOSB Chair Steve Ela stressed that farmer's markets and specialty crops producers offer a supply chain alternative which must stay open. Summers noted AMS is looking at grants, cooperative agreements, and university best practices research, for rapid responses.

National Organic Program Deputy Administrator Dr. Jennifer Tucker gave a brief update at the meeting, and drew attention to a more detailed presentation available in the Organic Integrity Learning Center. (See "Looking Forward..." in this Organic Cultivator.) She noted that the latest COVID relief information is available at [usda.gov/coronavirus](https://www.usda.gov/coronavirus). With certifiers' critical thinking in contingency planning and the regulations driving compliance, the public-private partnership is resilient and robust. Organic control systems continue to operate. She noted how certifiers and community organizations are helping to connect farmers and with buyers as markets change. For example, [our website](#) has a helpful, searchable database of MOSA-certified operations and products.

Containers, hydroponics and work plans

In March, the Center for Food Safety (CFS), along with a coalition of organic farms and stakeholders, filed a lawsuit against USDA. It claims that hydroponic operations violate organic standards, and asks the Court to stop allowance of hydroponically-produced crops sold under the USDA Organic label. Unresolved hydroponic and container production issues continue to arise in public comments, but not on the NOSB work plan.

Joel Kelly, Live Local Organic, testified he chose container production for growing out of season in Portland's climate. With current food security concerns, he said container certification clarity is more important now than ever. Dave Mortensen, NOSB Scientist, replied that NOSB would need a stronger signal from the NOP that this is something squarely on their work document. Kate Mendenhall, Organic Farmers Association Director, said OFA members' top concerns include prohibition of hydroponic production. Since NOP declared that hydroponic is allowed, she said certifiers creating their own standards undercuts the organic label. Dave Chapman, one of six farmer co-plaintiffs with the CFS lawsuit, said if we accept that organic does not really stand for healthy soil and we allow hydroponic production to be certified, the organic label will die. When asked about labeling production as hydroponic, Chapman said his dream would be that hydroponic producers create their own bio-ponic label.

Several NOSB members pushed Tucker to clarify requirements. Emily Oakley, NOSB Organic Producer, noted continuing confusion whether all container systems require a three-year transition. Tucker replied that certifiers are implementing the three-year requirement. Dan Seitz, NOSB Consumer/Public Interest Advocate, noted that container production has been very divisive. He understands that NOP wanted to wait to work on guidance, but thinks NOSB work on standards could help to heal the divide. Tucker said the current lawsuit may provide clarity. She said NOSB has discussed container production at length, and NOP is hearing more about fraud concerns. Mortensen countered that there's been no coordinated discussion addressing the criteria we'd like to see farmers follow in soil and liquid-based production. There has not been sufficient discussion or vetting of hydroponic methods since the allowance. He's not comfortable with the notion that producers are not concerned with the issue of container production. He said NOSB could take on container clarification work enthusiastically and without overwhelming other work.

This exchange fed continuing criticism around NOSB's inability to influence its own work plan. In meeting testimony, Patty Lovera, Organic Farmers Association, noted among OFA's top priorities is ensuring that - as an advisory panel "to

CERTIFICATION POLICY UPDATE

by Jackie DeMinter, Certification Policy Manager

National Organic Program (NOP) Updates Origin of Livestock (OOL) Proposed Rule

The second comment period on the proposed rule closed at the end of last year and we are hoping to see the final rule published this year. During an update for the recent National Organic Standards Board meeting, the NOP noted that more than 2,100 comments were reviewed from 2015 and 2019 and they have completed their draft of the final rule. They stated that the draft of the final rule is moving through the clearance process at the USDA and following the USDA's review, the final rule will move onto the Office of Management and Budget for a final review. This process can take a very long time, so we'll keep you updated along the way. The NOP's most recent update is available on the National Organic Program Organic Integrity Learning Center, covered below.

- While we don't know the specific changes the NOP made during drafting of the final rule, the proposed rule published on April 28, 2015 would:
- Allow a producer to transition nonorganic dairy animals to organic milk production one time. Multiple transitions would not be allowed.
- Require that transition be conducted over a single 12 month period. All animals, including dairy youngstock, must end transition at the same time. All animals must consume 3T or organic feed during transition.
- Continue to allow for the purchase/sale of transitioned animals between organic farms.
- Enable herd expansion during transition by allowing for the purchase of certified organic animals during transition.
- Require that a transition be conducted on a dairy farm. Operations must milk animals.
- Clarify that fiber bearing animals are required to be organic from the last third of gestation.

Organic Livestock and Poultry Production Rule (OLPP)

On April 23, 2020, the USDA Agricultural Marketing Service (AMS) published a [Federal Register Notice requesting public comment](#) on an Economic Analysis Report related to the [Organic Livestock and Poultry Practices \(OLPP\) final rule](#) (published on January 19, 2017) and [final rule withdrawal](#) (published on March 13, 2018). This action is a direct response to the court action that the Organic Trade Association initiated. The OTA stated, "USDA published this report in response to a Court order that agreed with the Organic Trade Association's lawsuit against USDA that the OLPP Rule was withdrawn based on a flawed economic analysis. Finding that USDA had voluntarily conceded the Organic Trade Association charges rather than proceed to judgment, the court ordered the matter returned to USDA for a 180-day period for the agency to correct its errors. Based on our preliminary review of the USDA's Economic Analysis Report, we identify several instances where USDA is manipulating variables in the cost-benefit calculation to favor data points that maximize costs and minimize benefits."

- *Productivity: In the OLPP Final Rule, USDA established egg production rates at 24.77 dozen eggs per laying hen per year and the new Report indicates a reduction to 23.04 dozen eggs per laying hen per year.*
- *Mortality: The Report seeks to calculate cost estimates that take into account a 3% increase in mortality rates (from 5% to 8%) as a result of OLPP Rule's new requirement for outdoor access.*
- *Willingness to Pay: The Report carries forward estimated values of consumer willingness to pay that reduced by half the values that were used to establish the OLPP Final Rule"*

Comments were open until May 26th. We sent a notification to all poultry producers encouraging them to comment with information about mortality rate, annual egg production, and overall compliance with the rule. As a reminder, this rule was intended to:

- Clarify how producers and handlers must treat livestock and poultry to ensure their health and well-being throughout life, including transport and slaughter.
- Specify which physical alterations are allowed and prohibited in organic livestock and poultry production.
- Establish minimum indoor and outdoor space requirements for poultry.

National Organic Program Organic Integrity Learning Center

The [Organic Integrity Learning Center \(OILC\)](#) was developed by the NOP to provide free online training to sup-

port the professional development of organic professionals working to protect organic integrity. To learn more about the OILC visit usdablackboard.com. The learning center is available to the public after registering for an account. To sign up for an account send an email to USDA-NOP@apvit.com. Subject line: Request USDA NOP OILC Account(s). Include your desired user name, first name, last name, organization, and email address in the body of the email. Courses currently available in the learning center include:

- An Introduction to the USDA Organic System
- Sound and Sensible Organic Certification
- Fundamentals of Inspection
- Advanced Inspections: Investigations
- Compliance and Enforcement: Adverse Actions, Appeals, and Reinstatements
- Import Oversight: Essentials
- Organic Dairy Compliance
- NOP Presentations (includes the NOP update presentation)
- We encourage all clients to take courses related to your organic production.

Many stakeholders in the industry are working together to develop additional lessons and new courses for the learning center. MOSA (Jackie DeMinter) was a contributing certifier member for a new lesson on conducting feed audits for the Organic Dairy Compliance course which the Accredited Certifiers Association is developing. The course is intended to help learners understand how to determine Dry Matter Demand including the records necessary for completing calculations.

Some of the upcoming courses include:

Recordkeeping, Organic System Plans, Traceability Techniques, Sampling and Testing, Materials Reviews, Organic Trade Arrangements and Labeling.

Keep an eye on the learning center for new courses to be added.

Strengthening Organic Enforcement Upcoming Proposed Rule

The Strengthening Organic Enforcement proposed rule is planned for publication this spring and will include updates to the USDA organic regulations for greater oversight of complex supply chains.

In a [notice to the trade community](#), the NOP commented, “Organic products include food, fiber and feed, in packaged and bulk form, all of which are regulated by the USDA Agricultural Marketing Service, National Organic Program (NOP). Organic agriculture is one of the fastest growing sectors in the food market. Protecting the integrity of the organic label is more important than ever, as the industry continues to grow. The proposed changes to the organic regulations will improve farm-to-market traceability of organic products, deter fraud, and bolster confidence in the USDA organic label.” The NOP noted operations that could be affected by the rule are those that import or export organic goods, assist others in meeting import/export regulations, buy or sell organic products (non-retail), negotiate sales between buyers and sellers (brokers), load or unload organic goods. The operations that should not be affected are retailers or those that simply transport or store organic products.

Once the rule is published for comments, MOSA staff will quickly set to analyzing the impacts for clients and MOSA. The NOP expects to publish the final rule in 2020 with a 12 month implementation period so feedback and preparedness will be essential.

National List Final Rules

The NOP has reviewed and accepted the NOSB’s 2020 sunset review recommendations and is renewing the listings of the following substances until 2025. §205.601 National List materials that will retain their current listing include: Alcohols: ethanol and isopropanol, sodium carbonate peroxyhydrate, mulches, compost feedstocks, aqueous potassium silicate, elemental sulfur, lime sulfur, hydrated lime, liquid fish, sulfurous acid, ethylene gas, and microcrystalline cheesewax. §205.603 materials include: alcohols: ethanol and isopropanol, aspirin, biologics, electrolytes, glycerin, phosphoric acid, hydrated lime, and mineral oil. §205.605 materials include: calcium carbonate, flavors, gellan gum, oxygen, potassium chloride, alginates, calcium hydroxide, ethylene, glycerides, magnesium stearate, phosphoric acid, potassium carbonate, sulfur dioxide, and xanthan gum. §205.606 materials include: fructooligosaccharides, gums, lecithin, and tragacanth gum. Each approved material has been determined to be necessary for organic production and/or handling and remains listed with any current annotations.

assist in the development of standards for substances... and to advise the USDA Secretary on any other aspects of the implementation of this chapter” ([Organic Foods Production Act \(OFPA\) §6518\(a\)](#)) - the NOSB needs more ability to set their own work agenda. The Organic Insider said “the original intent and spirit of the NOSB is that the board would serve as an expert panel to guide the decision-making of the agency. However, nowhere in OFPA does it state the NOP can control the work agenda.” However, the [NOSB charter](#) says “NOSB and subcommittee work agendas are developed in coordination with the NOSB and approved by the NOP Deputy Administrator.” That charter is up for renewal in 2020, but changing it is not easy. In 2018, USDA filed the charter renewal without an NOSB vote of approval. The Organic Insider opines that it’s an absolute imperative for NOSB to take back full control over its agenda, but, that could take another legal action, similar to 2014, when over 20 groups [filed a petition](#) when USDA made unilateral changes to the charter that gave the USDA the ability to potentially terminate the NOSB and changed the statutory responsibility of the NOSB as approved by OFPA.

Report from the NOSB Chair

Steve Ela drew attention to five open NOSB seats for terms starting in 2021, and said that Board members must represent the diversity of the organic community, including underserved communities. He also said the NOP must look at organic’s big picture, not just being focused on what materials should be allowed. He also noted the importance of face-to-face meetings, but acknowledged this virtual meeting’s accessibility benefits. He said organic agriculture is based on resiliency, but there’s a tremendous amount of insecurity in the marketplace. He asked the NOP and AMS to continue to support organic producers. Ela also noted that comments on the rule-making process make a big difference; he encouraged community participation.

Research Priorities 2020

The NOSB received 27 comments on research priorities, including a [written comment from MOSA](#). Many stakeholders identified ecosystem service assessment as important. Folks would like to see expansion of discussion of soil health. There were some concerns about the length of the research priority document and prioritization.

Marine Materials

MOSA also offered [written comments](#) on wild, native fish for liquid fish fertilizers, and an annotation change for fish oil. We and others asked for considering marine materials’ uses as a group. That’s feasible, but it’s hugely complex.

The 2018 sunset review for liquid fish products indicated some fish harvests exclusively for fertilizer. Further review showed fish are harvested for meal, oil, and solubles—but not exclusively for fertilizer. Some public comments noted that use of waste for liquid fish products could make harvesting fish for other purposes more profitable; we should not degrade the marine ecosystem to enrich the agro-ecosystem. NOSB may explore the feasibility of an annotation to restrict the exclusive use of meal, oil, and solubles.

Paper pots

Paper pots are particularly useful to farmers by reducing labor costs. “Paper” is a synthetic fiber; it’s also a bio-based product but not extremely biodegradable. NOSB intends that the fiber be cellulose based, but recognizes that impacts hemp and cotton alternatives. Comments said NOSB should specify additives, however, different products use different adhesives. NOSB is committed to working on these challenges.

[MOSA has commented](#) on this issue over several NOSB meetings. In her testimony, MOSA’s Policy Manager Jackie DeMinter pointed to the complexities: *“We continue to support listing of paper for use as a plant production aid, however, with this proposal we have some new questions. Does the new definition include production aids beyond those listed? Is the intention to allow materials composed primarily of paper, with up to 15% of other materials like adhesives and fibers? To require biobased testing for the entire product or testing for just the fibers? What is meant by cellulose-based? This new language and addition of biobased testing is confusing and needs further discussion. So does commercial availability documentation specifically pinpointing the biobased content of the fibers.”*

The petition was sent back for more subcommittee work. A vote will occur in the fall. NOP will continue to allow paper pots during this deliberation period.

Biodegradable Biobased Mulch (BBM) Film Annotation Change

BBM is a plastic alternative to polyethylene used for weed and pest control. There is much organic demand for use of films, but organic community ambivalence regarding BBM’s allowance. Many comments implore the Board and NOP to allow use of these materials. Beyond Pesticides commented that synthetic mulches should not replace organic mulch. MOSA commented that we receive many requests for its use, but there are no products on the market that can meet the 100% biobased requirement. MOSA and others noted we should step away from requiring 100% biologically sourced material. Organic operations’ plastic use would obviously decrease with a National List annotation aligning with avail-

able biodegradable products. Otherwise, we'd suggest that BBM should be removed from allowance. There are also some concerns that degradable plastics are produced from GMO, concerns about whether BBM fully degrades (depending on climate), and concerns residues may be left in soil and could end up in waterways.

Inertia on EPA List 4 – Inerts of minimal concern

The Standards allow certain inert ingredients in pesticide formulations, through an outdated EPA list. The current situation is dissatisfying, and stifles innovation. Work with the Safer Choice program may help develop a list of materials acceptable for pesticide formulations and meeting OFPA. There's hope the NOP will establish an agenda item to enable work with EPA. Delisting inerts would reduce availability and increase cost of many materials essential for organic production. MOSA noted we've recorded 90 different ingredients allowed per acceptable inert lists. These ingredients are included in 50 different MOSA-approved products used by 355 crop and livestock producers. With proposals to work with EPA and develop a new list, it's likely many currently used inerts would remain, and many formulations would not change. With organic's scale and the importance of less toxic pest controls, we need a system that works. Tucker said NOP is intently aware of the problematic nature of the very outdated reference. When a lot of thought was put into this a few years ago, changes would have been significant economically; other priorities were advanced. But now the landscape might be ripe for rulemaking. However, OFPA doesn't allow adding synthetic materials to the National List without a Board recommendation. So, a vote to delist inerts would need to be accompanied by another proposal. Scott Rice, NOSB Certifier, noted that a new NOP National List Manager could assist moving forward; this is an ideal case to draw on the Program's strength and other agencies' expertise. A-dae Romero-Briones, NOSB Consumer/Public Interest Advocate, said this warrants some discussion of NOSB recommendations' importance compared to interagency power dynamics. We have to consider future political rollbacks.

L-malic acid reclassification

The NOSB is considering changing L-malic acid's classification from agricultural (nonsynthetic) to non-agricultural (synthetic). Documentation may state it's produced naturally, but that refers only to the second part of its formulation process. The first part can involve non-synthetic fermentation of carbohydrates, but more typically it's from petroleum origin. Reclassification could also affect listing of other allowed materials using fermentation. In her testimony, Gwendolyn Wyard, Organic Trade Association, said as long as you view two-step production of malic acid as one process, and focus on the starting material, then there shouldn't be an impact on other material listings. In no other example is the final product a petroleum product. The issue is what constitutes a "source material" for products of fermentation. Substrates may include multiple inputs, which complicates things. [MOSA said](#) that calling L-malic acid synthetic could affect citric acid, lactic acid, enzymes, dairy cultures, etc. We noted that yeast has specific prohibition on petrochemical substrate and sulfite waste liquor. If the NOSB decides additional review criteria are needed for -malic acid substrate materials, we'd look for an annotation. Rice said the most straightforward option is to classify it as synthetic and annotate that the nonsynthetic source is required when available. To dive into fermentation boundaries would be a larger conversation.

Waxes – nonsynthetic (Wood resin)

Wax used for fruit coating keeps apples shiny for longer than just polishing the naturally occurring pectin. NOSB members will have a few things to consider. Relisting is supported by most commenters. Some comments suggest volatile synthetic solvents may be part of production. Some have concerns that wax on fruit can't be removed, so it's an unlabeled ingredient. But, to require labeling would be challenging.

Colors (18)

For natural colors, more comments are needed for the fall meeting. Ela noted colors have a lot of nuance. For some colors, crops have to be specifically grown; it is not just a byproduct. The incentive is based on price. There's conflicting color availability data from multiple manufacturers. NOSB will continue to explore the supply of each and possibly de-list some. Bradman noted that colors are not essential, although they have a lot of purposes. Comments also noted that some organic sources don't have the same quality or hue as conventional.

Discussion document: Fenbendazole – petitioned 2022 (for use in poultry):

Fenbendazole is currently listed for emergency treatment for dairy breeder stock only during specific life stages. An annotation amendment is requested for laying hens. FDA establishes the amount safe for use over an animal's lifetime, and determined that 2.4 ppm is a safe residue of Fenbendazole in eggs. It's typically administered to conventional layers before they receive outdoor access and again after they contact the soil. Some large organic flocks with outdoor access have higher parasite infection rates than conventional, resulting in 9-18% mortality. High liquid oregano doses improve prevention, but don't eliminate infestation. Worms in eggs would affect consumer trust in the organic label. Commenters noted concerns regarding residue in eggs, potential parasite resistance to Fenbendazole in humans, and that birds can end up as slaughter hens and all parasiticides are prohibited in slaughter stock. In



Robert Caldwell Retires A Life Dedicated to Integrity

After nearly nine years with MOSA as a reviewer, and most recently as a Customer Service Specialist, and with over 27 years of experience in the organic industry, Robert Caldwell recently made the decision to retire.

“My organic interest had a very deep beginning in me, sort of a soul longing. The first thing that I ever remembered thinking, when asked ‘what I wanted to be when I grow up,’ was two things, really; I wanted to be a farmer and I wanted

to be an artist. Both were somewhat far-fetched ideas in a practical based, non agricultural environment. I was not raised on a farm, I was raised in a cotton mill town in South Carolina. I went to college for three years but I got to the point where I felt I had to get out. College wasn’t giving me what I was looking for. So I applied for farm jobs and I ended up working on mainly dairy farms for the next ten years, the 1st one being a farm in Otter-tail Minnesota which I acquired by answering an ad in Hoard’s Dairyman magazine. I always had a garden on the side, and I was reading Rodale’s Organic Gardening Magazine and Mother Earth News. It seemed to be the best way to go. It seemed right to me to follow nature instead of trying to dominate it somehow. So that’s what I did; all my gardening was organic. The farmwork was all on conventional farms, there were not many organic farms in the seventies.” Several years later, I eventually graduated from college, with many of my courses in agriculture.

“In 1989 I moved to Michael Fields in East Troy, Wisconsin and I took the job as the dairy manager at their organic dairy farm. I was there for only seven months. Other things came up, it didn’t have anything to do with the farm, it was a great farm. That was my first certified organic farming experience. We then moved to Viroqua and I needed to work. I had been involved with biodynamics and Rudolph Steiner and we moved to Viroqua for the Waldorf school here. It was also the hotbed for organic certification, which I didn’t know when we moved here. Before too long I met David Engel; we were both parents at the Waldorf school. I then went to Little Rock, Arkansas and took the inspector training. In 1993 I started doing farm inspections for Dave Engel, mainly for OCIA and OGBA and a couple of others. It was such a good fit for me. It allowed me to have one foot in both art and farming.”

“I really loved meeting the farmers. Meeting their dog, and their family. Inviting me to lunch; showing me their weird contraptions out in the shed. They would show me a piece of who they were. These were people intimately involved in agriculture. They were inviting me onto their farm and sharing themselves and it was always a rich experience. I am not exaggerating when I say that for the first 20 years that I did that work, I couldn’t believe that they were paying me to do this. I felt so honored. I am not exaggerating. That’s how much I loved these people, this movement, and this job. I still remember people and farms from more than 25 years ago. I remember little things about their farm, their personalities or conversations that we had. For me the thrill was in meeting these people. It has richly enhanced my life doing that.”

“I started teaching in the Waldorf school in 1999, but I continued to do farm inspections on the side to supplement my income. I also had my own little certified farm outside of Viroqua where we grew vegetables for Organic Valley and had a little sauerkraut business. The whole time I was farming I was also inspecting. Sometime around 2006 I started reviewing files. I have been fortunate to have traveled all around the country and inspected all types of farms; big processors; small processors. It’s now a very diverse industry with a lot of different people. It’s been very rich for me.”

“When I first got started in organic, most everyone was in it because it was the right way to farm. I am probably not too far off base here to say that in the beginning of the movement, nearly all of the organic farmers would have done it that way whether it paid a premium or not. When the USDA National Organic Standards came out in 2001, it changed things. One thing it changed was that it made a level playing field for everyone. There was no longer very much difference in the regulations between agencies and I think that was good. Some people got more than what they wanted, and some people got less than what they wanted, but it was a good middle ground. But as things go, it has its benefits and its costs. What was lost in idealism was gained in economic opportunity for a more diverse group of farmers.”

“If we maintain integrity within ourselves; between our hearts, our minds, and our dreams, and if we carry that over into the world around us, and try to keep that personal integrity with how we deal with the Earth and with other people, I think we’ll be ok. It begins with the individual. For me personally, to feel that I have personal integrity between my inner life and my outer life feels good, and if other people do that, I think we’ll be ok. For me organic farming maintains our integrity with the Earth, and it’s beautiful to do that and feel integral with the Earth that we live on that provides for us. It just feels good to strive for integrity and understanding.”

The MOSA staff and board would like to thank Robert for his hard work, guidance, and dedication to organic integrity. Enjoy your retirement!

The renewal of the substances will avoid any unnecessary disruption in the organic industry that would result from removal.

One material was also approved to relist as prohibited for use in organic production. §205.602 will continue to list potassium chloride as prohibited with the annotation —unless derived from a mined source and applied in a manner that minimizes chloride accumulation in the soil.

National List Upcoming Rules

The NOP also intends to publish rules in 2020 including:

--A final rule for the Fall 2018 NOSB Recommendations which were covered in the [proposed rule](#) published on October 18, 2019. The changes included listing:

- Blood meal made with sodium citrate on §205.601 to be used as a soil amendment.
- Natamycin on §205.602 as prohibited in organic crop production.
- Tamarind seed gum on §205.606 to be used as a nonorganic ingredient in organic handling when an organic form is not commercially available.

--A proposed rule for Spring 2019 Recommendations. NOSB recommended adding:

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

We encourage you to comment on the proposed rule if these materials are important to your organic production.

--A proposed rule for Fall 2019 Recommendations. Changes include:

- Adding fatty alcohols C6, C8, C10, C12 naturally derived at §205.601 for sucker control on organic tobacco crops.
- Adding potassium hypochlorite at §205.601(a): *Chlorine materials - For use in water for irrigation purposes, residual chlorine levels in the water in direct crop contact or as water from cleaning irrigation systems applied to soil must not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act.*
- Removing dairy cultures from §205.605(a). While there is widespread support for the use of dairy cultures, the NOSB believes that this listing is now redundant and is covered by the listing for microorganisms. This removal would result in no changes for MOSA ingredient approval. ■

ORGANIC CERTIFICATION COST SHARE PROGRAM (OCCSP)

Update

As of May 18, 2020, OCCSP is not yet accepting applications. MOSA continues to check with the Farm Service Agency (FSA) regarding the program status.

We encourage MOSA clients to contact their local FSA county office FSA County Locator for updates. MOSA will post updates on our website and in future Cultivator newsletters. Feel free to contact Lexy McManaway, MOSA Cost Share Coordinator, 608-572-7276.

CLASSIFIEDS

LIVESTOCK

CERTIFIED ORGANIC DAIRY HERD-

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

ORGANIC RAM LAMBS

Lambs – 30 – 40 head certified organic ram lambs. Will be available at the end of May. Sikeston, MO. Call 417-270-0662.

HONEY BEE NUCS

We specialize in five frame nucs with three frames of brood, laying queen, and food. \$135. 10% off (\$25 per nuc) if paid by April 1. Should be ready by May 10. Mondovi, WI. Contact Jonas M. Stoltzfus @ S846 Sampson Valley Road, Mondovi, WI 54755.

SPRINGING HEIFERS AND CALVES

For sale, six organic springing heifers and 16 open heifers and calves. Call Ron at 715-977-0602. Baldwin, WI.

ORGANIC BUTCHER HOGS

MOSA Certified Organic Butcher Hogs. Mostly Chester White with some Berkshire genetics. Available now, with more coming over the next few months. Call for pricing. 920-905-3075. Reedsville, WI.

WANTED: ORGANIC BEEF AND DAIRY SLAUGHTER COWS

Open Range Beef from Gordon Nebraska is looking for Organic Beef and Dairy slaughter cows. Open Range Beef Est. in 2013 will be opening several buying stations throughout the State of Wisconsin. Competitive Organic Beef pricing at locations that will offer weekly markets. For upcoming locations near you and pricing call Trent Kling 402-909-2182 or email trentkling@orbpacking.com

PREMIER LIVESTOCK & AUCTIONS- NOW CERTIFIED ORGANIC!

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

LANDS / FARMS

RENTER FOR 85 ACRES OF ORGANIC-ELIGIBLE LAND

In search of renter for about 85 tillable acres of organic-eligible land coming out of CRP. Located in St. Croix County, WI. Land is right on Hwy 64 and is very accessible. Contact karen.marguerite@hotmail.com or call or text 612-978-2848.

ORGANIC ACREAGE, BARN & PASTURE

110 Acres near Cuba City, WI with current MOSA organic certification. Asking \$5,500 per acre. 30 tillable. 30 pasture. 50 wooded. Nice 40 x 70 barn and bull pen. Approx 1500 feet of new fencing in 2019. Stream and springs run all year. Woods with walnut, oak, maple, red cedar, birch, cherry apples, damsons and wild raspberries. Deer, turkey and wildlife are abundant. Beautiful hills and valleys. Email: westfarmshcia@gmail.com or call 563-583-1090 and leave a message.

LAND FOR RENT

20 acres of organic land for rent. MOSA certified. Currently in corn, soybean and pasture hay rotation. Brooklyn, WI. 20 min. south of Madison. Contact Dennis at 608-416-0364.

CERTIFIED ORGANIC FARM FOR SALE OR RENT

200 acre certified organic dairy grazing set up. Presently milking 55-60 cows with room for more. Free stall, milking parlor. Cattle (not certified organic) and machinery also for sale. call 715-308-2425. Menomonie, WI.

20 ACRES OF ORGANIC CROPLAND FOR RENT

We have 20 acres of certified organic, well fertilized crop land ready for tilling and planting this spring. Rent/Lease options available. Our organic dairy farmer/renter has retired. Located in southern Eau Claire County, Wisconsin. Tom @ 715-495-3856.

EQUIPMENT

WHITE FIVE BOTTOM ARS PLOW

588 White 5 bottom ARS plow. \$2500 715-297-1426 Andy Merrill, WI.

15' ROLLER CRIMPER

40 acres on unit. 6200\$ OBO. Call 605-728-7905. Blair, WI.

JOHN DEERE 825 6 ROW CULTIVATOR

C-shank. Very nice 2500\$. OBO. Call 605-728-7905. Blair, WI.

WHITE 6100 CORN PLANTER

New disc openers. New bushings. Heavy duty down springs. 2+2 dry fertilizer applicator, Yetter trash whippers. 40 acres on rebuild. Very nice. \$9000 OBO. Call 605-728-7905. Blair, WI.

YETTER ROW CROP CULTIVATOR

12 row five shank spring shank Yetter row crop cultivator. We had high speed fenders custom built that allows high speed cultivating. The shovels are needing replaced the framework and paint is

in great shape. \$1800.00. Macomb Il. Call 309-833-2921.

EINBOCK TINE WEEDER

30 foot wide fold up Einbock Tine weeder that can go up to 40 feet. This has been used on less than 200 acres and is like new. \$9500.00. Macomb Il. 309-833-2921.

CUSTOM MADE 12 ROW FLAMER

Two year old custom made 12 row flamer. This flamer works great and is like a new one. We are reducing our organic acres and no longer need it. We can send pictures of it to anyone interested. \$19,500.00. Macomb Il. Call 309-833-2921.

STORAGE BARN

30'x70' new in the box storage barn with poly roof. White with green trim. 13x13' door on one end other closed. \$4500. Call Andy at 715-297-1426. Merrill, WI.

VINEYARD SPRAYER

Vineyard sprayer fan type 3pt 200gal tank pto driven radial roller pump. New pillow block bearing, paint, new hoses and filter and nozzles. quick disconnection for easy draining. ready to work. \$4500 Merrill, WI. 715-297-1426.

FORAGES/GRAINS

ALFALFA HAY OEFFA CERTIFIED

2019 1st cutting alfalfa for sale. Located in North Central Missouri. Always shedded put up dry 3x4x8 large square bales. Approx 1350lbs. Call 660 654 3175 \$175 per ton.

ORGANIC CORN

Organic corn for sale 400-500 bushels. Corn is in bin. Northern WI. Ashland, WI. Call 715 862 2777.

CERTIFIED ORGANIC HAY

Certified organic hay. 2019 cuttings. Small square and round bales. Different varieties available so please call for specifics. All stored inside. Located Durand, MI 48429. Call 989-302-0087.

ORGANIC HAY, OAT STRAW & CORN STALKS

Certified organic 1st cutting 3x3x7.5 dry hay 90% grass RFQ 123. 3rd cutting 3x3x7 dry hay 90% grass RFQ 136. Oats straw from 2017, with the oats on 4x5 round bales net. Corn stalks 4x5.5. Contact Milton @ 608-921-3765 or Ervin @ 608-426-1726. Brodhead, WI.

SHELL CORN

Organic shelled corn for sale. 55# Test weight. 6000 bu. Boyceville, WI. 715-607-0988.

COMMERCIAL RED WORMS & CASTINGS

10 lbs of red worms available for sale after the 4th of July. Also have several tons of worm castings. Richland Center, WI. www.wisconsinredworms.com
Tel: 1-608-647-2008
Cell: 1-608-475-2624

**FEDERALLY INSPECTED MEAT
SLAUGHTER & PROCESSING FACILITY**

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

ROLLER CRIMPERS

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

CRESCENT MEATS - USDA INSPECTED - CERTIFIED ORGANIC

Crescent Meats - Cadott, WI, family owned for 15 years full service slaughter facility, usda inspected-certified organic 15332 State Highway 27, Cadott, WI. Phone: 715.289.3000
crescentqualitymeats.com

ELECTRIC WEEDER FOR RENT

Kill weeds, and do it without chemicals – electrocute them. Rent an electric weeder from Quality Organic Producers Cooperative. 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.

lot of the equipment and procedures are similar, but I also did a lot of research and small test distilling on my own to learn more. From the day we started planning the business until the day the doors opened, I was testing batches and recipes. During that testing, we tried about 50 different open-pollinated, heirloom corn varieties to find ones we liked,” noted Parr.

“Based on those tests, we started to narrow those 50 varieties down to a handful that we liked. Then we had to be sure they could be grown in this area and were available enough to grow what we needed for production. It was an interesting process when we started teaming up with farmers.”

“Patrick McHugh became an important partner early on. Partick does a lot of farming, including some no-till organic farming. All of the open-pollinated, heirloom grains he is growing for us are grown organically using no-till methods. That open-pollinated piece is really important, and a big focus for us. We are trying to propagate as many as possible for our production because we can control our seed stock and it supports pollinators. The hummingbird is our logo mascot because they are a vital pollinator along with bees, moths, butterflies, and bats. Our mission is to support these pollinators by growing open-pollinated crops,” added Staehly.

Parr explained, “organic is great, but we also have to recognize that buying something and shipping it across the country is not sustainable. We want to utilize resources responsibly, which means being as local as you can be. We source most of our ingredients here in the Driftless, including most of our grains, the apples for our apple brandy, which come from Hoch Orchard, organic maple syrup, as well as other ingredients. Certified organic honey is hard to find anywhere due to the requirements that the honey is harvested in a location where there are no chemicals being used in agriculture or other industry within a certain mileage.”

“Our products are a work in progress. We are really just shooting for a high quality product in any of our spirits. We are striving to do the best we can, price it competitively, and letting doing the right thing guide us first and foremost. We want to make interesting and rich products that people are going to enjoy, and hopefully, we’ll be able to scale it up and make it more profitable as time goes on and production increases.”

“Approximately 30% of our total sales is done through the tasting room in the form of cocktails and bottles sold directly from us to the customer. The rest we sell through distributors in Wisconsin with plans to expand soon. A lot of thought went into the decision to create multiple brands. There are two ways to look at marketing, you can be a house of brands or a branded house. After taking a long look at it all, we decided to be a house of brands for several reasons. We have aspirations to present our brands nationally, and even internationally. A branded house, where everything falls under one brand, is usually found in the smaller micro-distillery/craft distillery worlds where everything appears under one banner, usually the name of the distillery. If we had done that, everything would be sold under the La Crosse Distilling Co. brand, which we felt would be a hard sell outside of the local area. We felt that we have a better chance of getting our products out into the world with stand alone brands instead of everything being named under the one banner,” explained Staehly.

“We developed this facility with expansion in mind. We are only at about a fifth of our production capacity. We can increase our production five-fold as needed. We plan to bring in a new continuous still that is primarily designed for creating high proof clear spirits, which is key to creating a very high quality vodka or gin,” Parr mentioned.

“When the new still is up and running and creating clear spirits, it will

free up the Kothe still for us to make more bourbon, rye whiskies and brandies, and be able to run both stills at the same time. This will allow us to increase our production from 10,000 cases a year to 20,000 and higher," said Parr.

"There are some exciting and romantic things to do with these distillates from newly discovered heirloom varieties of grains, along with different barreling and aging techniques. We eventually want to grow our operations so that we can expand and move the bulk of our production out to a farm and grow some of the crops and ingredients right there so we can show people the entire process and create a setting where people want to gather. We all have a really strong passion for music too, so once we get out on the farm we would like to incorporate some music events and shows. We hope to help build this community," Staehly added.

"We'd encourage farmers to reach out to local distillers and brewers and vice versa. There is an exciting and rewarding partnership to be had. We personally love working directly with these farmers. Currently we are pretty set on our grain needs, but a lot of distilleries out there are buying grains through third party suppliers. Find out what distilleries are around you, reach out to them and start a conversation. I think there is a great conversation to be had that can benefit both sides."

"We like to say that we want to leave this place better off than we found it. The more we help each other out the better off we are. A good example is a new division of our company that was created to make hand sanitizer. We had heard that a couple of distilleries on the west coast were making hand sanitizer to help with the shortages as a result of the Covid-19 pandemic. We had even discussed making it before the pandemic as an additional business opportunity. The Trade and Tax Bureau, which oversees alcohol manufacturing for the federal government sent out an email asking for help making sanitizer and included an approved formula for making it. It was the World Health Organization formula, which is a very high alcohol content formula. If any distiller could make it to those specs, then they would grant approval to do that. We made a plan and made an announcement that we were going to make hand sanitizer and provide it to the community as a free service to help out. The reaction in the press, both locally and beyond, was bonkers; our phone and email started ringing off the hook. This big door just opened for us, so we walked through it and are currently building a new company called Forward Path Logistics Hand Sanitizer. We are outsourcing some of the production, but it is growing into a new business based out of necessity and need."

For more information about La Crosse Distilling Company visit:
[La Crosse Distilling Co.](#) ■

her NOSB testimony, Jackie DeMinter also highlighted [MOSA's written comments](#) on Fenbendazole: "*The addition should not be a replacement for good management practices. We request additional guidance on what is meant by "emergency" for a poultry flock. We understand that emergencies are urgent and nonroutine, and exist only when all other measures have been exhausted. Can the NOSB provide situations that would lead up to whole flock treatment? We requested this same basic guidance for all species of livestock during the NOSB's work on defining 'emergency.'* With little or no withholding period for milk, meat, or eggs, we would expect to see the use of parasiticides increase." Mortensen noted he's bothered by the notion that this is organic IPM for chickens. The argument was this needs to be a routine kind of cleansing of the birds, raising questions about the foundational cultural management system. We cannot have an emergency every time there is a new flock in the hen house.

Some reflection

At the close of the NOSB meeting, there was satisfaction with how well the meeting went despite difficult circumstances. Jenny Tucker noted "we all came together for this community ritual of collaborative engagement."

Looking Forward - Here's what's coming from NOP

Here's some of what's in the NOP Program Update as prepared for the NOSB meeting. See the full presentation in the [Organic Integrity Learning Center](#).

NOP's goals include Strong Organic Control Systems, Farm to Market Traceability, Robust Enforcement, and Support the Standards; Collaborate with Community. The video presentation includes many familiar NOP faces as staff share details on their work.

The *Strengthening Organic Enforcement Proposed Rule* will strengthen supply chain oversight, require more types of businesses to be certified, require electronic import certificates (now optional; system updates are needed for full implementation), improve traceability, and inspections' consistency. This proposed rule is in the final step of clearance, back with the Office of Management and Budget (OMB) after NOP had responded to OMB questions. Publication is expected this spring, then comes a period for *absolutely necessary* comments from organic stakeholders. Stay tuned.

The *Origin of Livestock Final Rule* covers a proper one-time organic conversion for nonorganic dairy animals. It's moving through the clearance process, soon on to the final step. OMB has 90 days to review it and Jenny Tucker expressed confidence it will move quickly. The proposed rule received over 2100 comments, since 2015.

A final rule and two proposed rules cover *NOSB materials recommendations* from 2018 and 2019. These are expected this summer.

New [Organic Integrity Learning Center](#) courses for 2020 will include Recordkeeping, Organic System Plans, Traceability Techniques, Sampling and Testing, Material Reviews, Organic Trade Arrangements, and Labeling. In a unique project with organic inspectors - now limited in their ability to travel - NOP is pulling in their expertise to enhance Learning Center coursework.

NOP technology advances include the Noncompliance Library and a forthcoming Certifier Web Portal, which will make certifier audit processes more efficient.

NOP's *International Activities Division* is now separate from Accreditation, and there's a new AMS Trade Systems Division. International trade arrangement negotiations are complete for equivalence with Taiwan, implementing its own organic regulations on May 30th. The US also completed US/Japan equivalence arrangement negotiations to add livestock and livestock products, before mid-July. Mexico equivalence discussions have paused, but trade has continued without issues. Equivalence with the UK is finalized; that will be very similar to the current US/EU Arrangement. Meanwhile, new EU organic regulations will be implemented in 2021, requiring new equivalence negotiations. Canada's regulations are also being revised, with expected updates to our current equivalence arrangement, including that certifiers - not exporters - must issue the attestation statement for products exported to Canada.

A new *Interagency Organic Imports Working Group*, required by the 2018 Farm Bill, brings together multiple USDA agencies and Customs and Border Protection offices and is coordinating imports information and improving supply chain integrity.

The Compliance Division is increasing use of *quantitative data*, like monitoring yield and trade data, to oversee complex supply chains. This strengthens NOP's relationship with other USDA agencies and offices. ■

Organic NY – All in This Together!

At home
Grow your Food
 Windowsill to full scale - growing your own food provides fresh, healthy produce for you and your family.
Compost
 Keep organic matter out of the waste stream by starting a compost pile. No backyard? Try this.
No Pesticides
 Avoid toxic chemicals and fertilizers. Learn more about organic land care from our friends here.
Join NOFA-NY
 Become a member today and get one friend to join this year!

Locally
Take a Class
 Gardening, cooking, food preservation - make the most of the bounty of our state.
Buy Local Organic
 Purchase food at farmers' markets, farm stands, or join a CSA.
Use Local Seeds
 Save your own, share with friends, or join a seed library.
School Gardens
 Push for school gardens with nutrition programs and food purchases from local farms!
Push Stores & Eateries
 Introduce local organic farmers to your favorite chef. Request local organic ingredients where you shop & dine.

County
Join or Start a Food Hub
 Establish or join a community run, cooperative food hub to market area farm products.
Order in Bulk
 Order garden, farm supplies and livestock feed in bulk to receive reduced prices, and to help support farmers, producers and agricultural educators. See an example here.
Become a Water Guardian
 Your county can provide incentives to landowners who reduce or refuse the use of chemicals to protect ground water.

Statewide
Know the Issues and set your Priorities
 Build support for NOFA-NY's packet of legislation to increase organic farming in New York State.
Know your State Legislators
 Get to know your State Senator and Assembly member, and ask them to support our Policy Initiatives that reinforce the importance of organic!
Donate
 Donate to NOFA-NY today and help us grow our reach!

Federal Level
USDA National Organic Program
 Keep organic standards strong and ensure consistent accreditation and inspections.
Healthy Food for All
 Campaign on the nutritional value and benefits of organically grown food.
Farm Bill
 Support organic and beginning farmers and make healthy food available to all!
Know your Members of Congress
 Find out who your Senator or Representative is and ask them to support our Policy Initiatives!

Icons created by FlatIcon

New York Organic Action Plan infographic - how to plug in at many levels

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CERTIFIED ORGANIC

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