



INSIDE THIS ISSUE

A FARM FOR ALL SEASONS	1
FROM THE DIRECTOR	1
CERTIFICATION RECORDKEEPING THAT WORKS	4
TENSIONS, WITH BEST INTENTIONS: CONTINUING IMPROVEMENT IN ORGANIC	5
CERTIFICATION POLICY UPDATE	6
IFOAM NORTH AMERICA 2021 ANNUAL MEMBERSHIP MEETING	10
NOP 2021 DIRECTOR'S AWARD	11
CLASSIFIEDS	12



FROM THE DIRECTOR

Cori Skolaski, Executive Director

Welcome to our first newsletter of 2021! Spring is just around the corner. March 16th marks one year since most of MOSA staff have been working from home due to the ongoing pandemic. As I've reported in past newsletters, this has gone well for us; we are as productive and efficient as we've always been. Our primary objectives remain to keep our staff and clients safe, and to maintain the high level of customer service we expect from ourselves, and that our clients have come to rely on. I believe we have been successful! And to that end, I am happy to tell you that if you live close to our offices in Viroqua and you really need to meet with one of our staff in person, we can accommodate you. You'll need to call ahead to make an appointment, and we will require you

see DIRECTOR on page 3



the ORGANIC Cultivator

VOL. 19 ISSUE 1 SPRING 2021

A Farm for All Seasons Tucker & Becky Gretebeck

Joe Pedretti, Editor

The second oldest farm in Wisconsin is owned by Tucker Gretebeck's Grandparents near Edgerton, WI. It has been in their family since the Gretebecks (originally Grytk) immigrated from Norway in the early 1800's. Tucker's Dad moved to the Viroqua area in the late 60s to start his own farm and was soon raising 20 acres of tobacco- and made enough to buy his own farm near Stoddard, WI. Years of hard work farming, all while working for the Genoa Power Plant, allowed him to buy a farm near Westby in 1980.

"My Dad overpaid for that farm, because that farm came with a



see A FARM FOR ALL SEASONS on page 2



large tobacco allotment, which was hard to get at the time. That and the high interest rates. In 1988 we had a terrible drought and almost lost the farm. Mom went back to school and became the Westby High School secretary. I remember selling off a lot of our farm equipment and cows to make ends meet. That drought in '88 just about sunk everyone. My parents were lucky to hang on to it," remembered Tucker.

"My brother joined the military and I went off to college on a football scholarship. There was just not enough income to support two families on the farm, but my hope was to leave and come back. Even while in college I raised five acres of tobacco. After I graduated, I came back to the area to teach. Unfortunately, due to budget cuts, I was laid off nearly every year and was always wondering if I would have a job. There was always either a lack of money or a lack of kids. Teaching in a small district was tough, especially in elementary without tenure. It was during this time that I married my wife Becky (2000) and we built a house, all while farming with my Dad. We did what we had to do."

"After five years of teaching my final contract didn't come through. At the same time Becky's brother moved to Alaska and left the home farm (owned by Becky's parents at the time). That gave Becky and I the opportunity to take over farming operations. Ernie (Peterson) of Cashton Farm Supply had put pullets in the barn and had seeded down all of the fields to hay, which was good in my favor for transitioning. Two acres of the farm had been sold off, a corner by the road, and a nice house was built. Becky's parents had asked to get the first opportunity to buy it if they ever sold, and they called soon after we bought the land. They bought it and moved there. My brother Gunnar moved back after the military and moved into the house we built on my Dad's farm, and we moved into Becky's parent's house, so all three of us traded houses and this is where the farming part really comes into play."

"Since I wasn't teaching, and there wasn't any income from the farm yet, I worked construction for a year while I updated the barn. I had decided that milking cows sounded like a way



better idea than working inside. I have always had that entrepreneurial spirit. The farm is an empty pallet. Be flexible and look for opportunities," emphasized Tucker.

"We actually started raising pumpkins a year before we moved to the new farm (2005). What started as $\frac{1}{4}$ acre and four families turned into a good agritourism enterprise with 4000 people visiting every year. That valley below the farm was just beautiful. We started with an old tobacco barn and then we added something new every year, mostly for the kids, but it became an event location for weddings, school groups, and open to the public on weekends. We gave wagon rides, had actors panning for gold in the creek, and we

see A FARM FOR ALL SEASONS pg. 3

to wear a mask and observe safety protocols. We also have a drop box near our office entrance where you can securely submit paperwork and payments.

In early January, MOSA clients received their update paperwork either in the mail or via email. Now, with the fast-approaching deadline to submit your updated paperwork, is the time of year we talk to many organic producers - our phones are ringing with questions ranging from what form to fill out, how to log into MyMOSA, whether an input is allowed, how to make a payment, etc. We are happy to answer your questions!

Now we are also ramping up our inspection season. Some things to keep in mind:

- If you are adding new land to your certificate, it will need to be inspected prior to grazing or sales.
- New facilities, production lines, unique production equipment, or herds must be inspected before they can be added to your certification.
- All organic retail labels must be approved by MOSA before use.
- All inputs must be reviewed and approved before use.
- If you need to change your organic system plan or certificate, review NOP Handbook Instruction 2615 for details. Be sure to notify us of any of the changes listed above or if portions of your operation are being removed from organic production, if there has been the application of any prohibited substances whether intentional or not, or any other change that you think may affect compliance.
- At any time, you can log into mymosa.org to review your organic system plans and paperwork, see your inspection report, view or pay certification and inspection fees, and view and print your organic certificate.

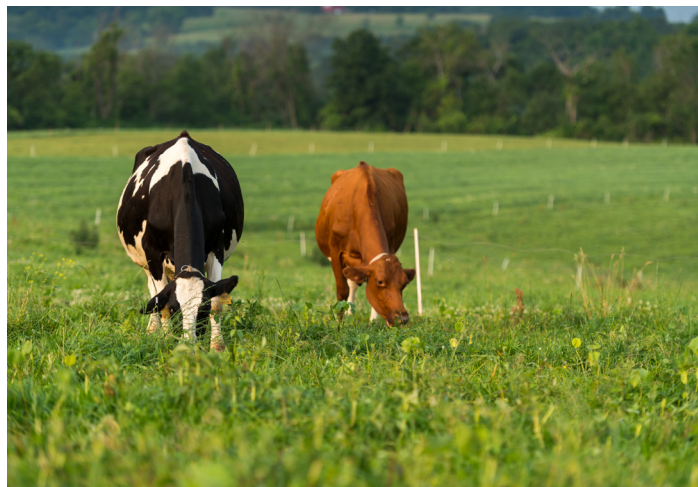
In MOSA news...We were very pleased to be recognized by the NOP among four certification agencies receiving the 2021 Director's Award, emphasizing collaborative communication. Before naming those recognized, NOP Director Dr. Jenny Tucker explained how communication is the key to consistency when negotiating the public-private partnership of standards enforcement. The Directors Award reflects a high level of active communication, regular open discussions, and ongoing close collaboration with the National Organic Program. In other news, Val Torres has been promoted to Customer Service Specialist, Stephanie Leahy has been promoted to Certification Team Lead, and Eric Gundersen has returned to MOSA as a Certification Specialist after a several-year hiatus as he advanced his education. Congratulations to them all!

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. ■

told a lot of the history of the area. It made people happy, and we really liked doing it."

"Between my sister Dani's farm, my parent's farm, and our farm, it creates a triangle of all certified organic farms, and we work a lot together. Dani's husband Nate is a John Deere mechanic, and fixes our equipment. Dad still helps, and likes to drive tractors. Up until a few years ago, when Dani sold the cows, he milked every morning for her. It's neat how we all support each other."

"We bought the cows and started milking in 2006, and then in 2012 decided to



go grassfed. We were one of the first nine Organic Valley dairy farms on the Grassmilk truck. I jumped at the opportunity. When I was in college and my brother was stationed in Germany, he lived in a small town with three dairy farms in it. He knew each one of the farmers and helped out when he could. I got over there three times and they did it all without grain. The cows looked great. They chopped and had silage bunkers for the winter feed. They were small farms, about 35 cows. This is why travel is so important, you get new ideas and see how other people do it. When we decided to go grassfed, we got in touch with some other Organic Valley farmers that had been doing it for years. There were definitely naysayers, but I liked the opportunity to prove them wrong. There are now 150 plus Organic Valley Grassfed farms."

"I wouldn't recommend going grassfed cold turkey like we did. That is not the way to do it, but without knowing any better, because we were on time constraints, and

CERTIFICATION RECORDKEEPING THAT WORKS

With another certification update season upon us, now is a good time for both new and experienced organic operators to consider refining their recordkeeping to stay in compliance with the National Organic Standards, and to make these records more effective and efficient for themselves and for MOSA reviewers and inspectors.

WHY KEEP RECORDS?

Organic certification is based on developing and following a plan for how you intend to farm or make food (or feed or fiber) organically. The records required for organic certification provide necessary details about the operation that aren't included in the Organic System Plan. As noted in the National Organic Standards, these records "must be adapted to the particular business that the certified operation is conducting" NOS[205.103].

Production records, such as a field activity log for a crop farmer, a flock health record for a poultry producer, or a roasting log for a coffee roaster, show whether or not the organic plan is being followed. Together with receipts for inputs (such as seeds, fertilizers, organic food ingredients), and invoices for sales of organic products, production logs establish traceability. Additionally, these records allow the inspector to determine if there were sufficient organic ingredients and allowed inputs to justify the amount of organic products sold or distributed (auditability). Finally, some records are required to document a response (cleaning equipment, switching sanitizers, or turning off boiler chemicals) to a commingling or contamination concern.

MOSA provides several possible documents that clients can use as part of their recordkeeping system, yet we also accept other formats if they show all of the necessary information and are auditable by MOSA inspectors. Your MOSA Reviewer will determine what's acceptable regarding the certification records at your operation. (Forms available at mosaorganic.org)

RECORDING ACTIVITIES

Activity logs, where you make notes about your farming or handling practices, are the main example of a record for which MOSA does NOT provide a ready to-use form, mainly because there are so many variations available depending on the nature and goals of your operation. Which format you choose will depend on your choice of paper or computer and whether you are maintaining the record solely as a certification requirement or as a means of understanding and analyzing your business. All collection formats work best when you record the information in a timely and consistent manner.

Here are some examples of daily activity records:

- Calendar
- Notebook
- Daily Diary
- Map with Notes
- Preformatted Template
- Spreadsheet
- Software

ORGANIZING THE RECORDS

How the records for an operation are written will often determine how they are saved and organized. Recordkeeping can be inexpensive and relatively easy upfront, but not allow for retrieval or analysis later, or the system can be costly to establish but allow for tremendous opportunities for analyzing and using the information. The best systems allow for both easy input and output of information.

Here are some of the common organizational methods:

- The Box. Not always a shoebox, but sometimes it has been. For the producer who has not previously saved records, this method at least locks down papers, particularly receipts and seed tags, before they scamper away. Retrieving items for organic certification from the box makes for a longer inspection.
- Clipboards. These work well if each clipboard contains a record of a certain type, such as seed tags or sales invoices. Farms and food handlers with software systems will often use clipboards with paper templates for production records; data from the templates is later entered into the software system.

TENSIONS, WITH BEST INTENTIONS: CONTINUING IMPROVEMENT IN ORGANIC

Stephen Walker, Accreditation and Industry Affairs Manager

At the time of this writing, many of us organic certifiers and inspectors are finishing up over 30 hours of online training presented by the National Organic Program, Accredited Certifiers Association, and International Organic inspectors Association. Meeting with our close colleagues in organic standards enforcement is always a charge, and always raises questions of balance; we all aim for continuous improvement in organic, but also recognize limits on our capacity for changes. Diverse organic stakeholders can have conflicting ideas on the best way forward. As I consider changes and hot topics in our regulatory realm, I'm again aware of these tensions among all of us with good intentions. I've also seen tensions around organic regulations and enforcement improvement in several recent writings from others in this movement.

In late December, I received an email from Dave Chapman, Real Organic Project Co-Director, promoting ROP's January symposium featuring an impressive number of notable speakers. Chapman called for action in improving on the current state of organic.

"One of the great debates in the organic movement is whether it is wrong to speak out. Is it wrong to criticize the organic label if we really want to strengthen that same label? We know that publicly criticizing the 'organic brand' can be a gift to... the traditional enemies of the organic movement. After the passage of the Organic Foods Production Act in 1990, the organic market continued to grow. At some dangerous point, many huge corporations realized that there was more money to be made in joining the label than in fighting it. Unfortunately, their conversion was often very shallow. We face a difficult choice. Do we remain silent, or do we raise hell? If we remain silent, things only get worse, and quickly. If we raise hell, we undermine the 'organic brand' that still serves so many legitimate organic farmers and eaters."

Chapman suggests a "third path" of "going directly to the farmers and eaters... working to become a trusted friend, a matchmaker who can arrange wonderful food marriages" and using the ROP add-on label while still working for regulatory improvement.

Via my IFOAM, North America Board work, I was introduced to an interesting article, "Tensions in future development of organic production—views of stakeholders on [Organic 3.0](#)."* This Swedish study notes struggles for balance as organic pushes upstream with our

regenerative solutions for a better future. It analyzed stakeholders' views on future organic production and consumption developments based on IFOAM's Organic 3.0 strategy for moving organic from niche to the mainstream, and positioning organic systems among solutions to solve human and planetary crises. Organic 3.0 aims to counter challenges limiting organic's ability to sustainably provide food in a changing future. These include a low percentage of agricultural conversion to organic, burdensome certification systems, the marketplace not rewarding environmental benefits, and overemphasis on yields. The study found four unresolved tensions in our way forward.

The first tension was between increasing efficiency to achieve higher yields, and agroecological approaches for better sustainability. One development pathway uses our current agricultural system, where substitution of eco-friendly inputs increases organic yields. Another pathway involves more systemic redesign based on organic principles and agroecology.

The second tension considered plant nutrient needs and safe recirculating of nutrients from society. There was consensus that nutrient flows must become more circular, but, some useful recycled nutrients from society are prohibited by organic regulations. Further, a shortage of nutrients would be a limiting factor if organic production would increase. Organic production typically uses external resources.

The third tension set new technology against the precautionary principle and the notion of "naturalness." Organic folks can be skeptical of new technologies, which Organic 3.0 encourages. This can seem contrary to the precautionary principle of "care," and the valued concept of naturalness. Yet, some thought organic would benefit from being perceived as more modern.

The fourth tension concerned the role of organic as an innovation system. Should organic be a forerunner, or a broader "big tent" movement which may require more regulations? Should organic be pioneering and niche, where few producers can meet high standards and obtain a large price premium, or, should organic aim to broaden its reach, but lowering the price premium? Also, some participants argued that regulation brings more innova-

CERTIFICATION POLICY UPDATE

by Jackie DeMinter, Certification Policy Manager

National List Final Rule

On November 5, 2020, a [final rule](#) amending the National List of Allowed and Prohibited substances was published. The effective date for the new rule was December 7, 2020.

This action:

- adds **nonorganic tamarind seed gum** to §205.606 when organic is not available.
- does **NOT** add **blood meal made with sodium citrate** to §205.601 for crop production.
- does **NOT** add **natamycin** as a prohibited nonsynthetic material to §205.602.

As a reminder, the National List of Allowed and Prohibited Substances identifies the synthetic substances that can be used, and the natural substances that may not be used, and a limited number of synthetic, natural, and nonorganic substances that can be used in or on processed products. Many materials have additional annotations which must be met in order to use the substance. Changes to the National List are initiated through petitions to remove or add a substance or through the NOSB's sunset review process which occurs on a five year schedule for each listed material.

Herbicide Use Policy Reminder

Any product labeled as an herbicide cannot automatically be approved for the purpose of terminating crops, cover crops, field scale weeds, or as a plant growth regulator, desiccant, or defoliant. When an herbicidal substance is used for any of these purposes, the plants or part of the plants are being treated as weeds so the 205.206(e) restrictions apply. In order for MOSA to approve an herbicide for any of these uses, the operator must demonstrate an attempt to manage the "weed" through cultural/mechanical/physical means such as: (1) Mulching with fully biodegradable materials; (2) Mowing; (3) Livestock grazing; (4) Hand weeding and mechanical cultivation; (5) Flame, heat, or electrical means; or (6) Plastic or other synthetic mulches (Provided, That, they are removed from the field at the end of the growing or harvest season), etc before resorting to a biological or botanical substance or a substance included on the National List of synthetic substances allowed for use in organic crop production. Then, the conditions for using the substance must be documented in the organic system plan. All inputs are to be listed on the Crop Input Inventory and approved by MOSA.

National Organic Program Organic Integrity Learning Center

This training resource was developed by the NOP to provide free online training to support the professional development of organic professionals working to protect organic integrity. If you have an Account: [Access the Learning Center](#). If you need an account sign up on the [NOP Organic Training](#) page. For questions about the Learning Center, contact USDA-NOP@apvit.com.

New courses have been added to the [Organic Integrity Learning Center \(OILC\)](#).

NOP-140 Recordkeeping

Recordkeeping by certified operations and certifiers is a key requirement of organic certification. This course introduces certifiers and inspectors to a variety of recordkeeping systems encountered across the range of certified operations. It also examines challenges created by different operational activities and complexity levels. Finally, this course helps certifiers structure internal and collaborative recordkeeping reviews across operations.

NOP-150 Organic System Plans

The Organic System Plan (OSP) is a document that serves as the basis for communication between an organic business, the certifier and the inspector. It is the foundation of the organic certification process. This course teaches requirements related to OSPs in the USDA organic regulations, examines the different functions of the OSP, discusses critical organic control points, and provides OSP evaluation and design considerations for certifiers.

NOP-170 Certification Review Essentials

This course is for organic certification reviewers and describes how effective reviews of the Organic System Plan (OSP) and inspection report support organic compliance. This course guides certification reviewers through OSP requirements and critical control points, OSP assessment, inspection report review, and applying skills using case scenarios. This course helps reviewers gain confidence in completing effective and efficient reviews that lead to appropriate and defensible certification decisions.

NOP-250 Natural Resources and Biodiversity

Core principles in organic farming systems include protecting natural resources and enhancing biodiversity. USDA organic regulations require operations to maintain or improve the natural resources of the operation, including soil and water quality. These are broad categories encompassing a range of activities impacting wildlife, water, soil, and air quality on a farm.

This course teaches certifiers and inspectors how to assess natural resources and biodiversity requirements as indicated in organic system plans (OSPs) and on-site during annual inspections. The course provides tools that help you know what to review and what to include in inspection protocols and reports.

NOP-110 Preventing the Organic Fraud Opportunity

This course, developed by a food fraud expert, teaches certifiers and inspectors fundamental supply chain risk management concepts that can reduce the organic fraud opportunity. Participants review case studies and apply intelligence gathering and analysis techniques to understand where supply chain weaknesses occur. The course helps certifying agents and inspectors understand whether certified operations have implemented effective organic fraud prevention strategies and whether the strategies are active and being reviewed for effectiveness.

NOP-120 Input Material Review

Material review is critical for organic production and handling. Material input decisions directly impact the status of organic operations. This course, developed in partnership with the Organic Materials Review Institute (OMRI), teaches participants how to know which input sources are allowed and which restrictions apply to specific input materials.

The course explores fundamental material review principles, organic regulatory requirements, resources for making informed decisions and real-world examples. Course lessons include:

- Fundamentals of Material Review
- Crop Inputs
- Livestock Inputs
- Handling Inputs

In addition to the new courses described above, the learning center also has the following courses available.

NOP-010: Introduction to the USDA Organic System
NOP-020: Sound and Sensible Organic Certification
NOP-030: Fundamentals of Inspection
NOP-040: Compliance and Enforcement
NOP-050: Certification Administration Essentials
NOP-060: Import Oversight: Essentials
NOP-070: Advanced Inspections: Investigations
NOP-080: Traceability Techniques
NOP-090: Organic Dairy Compliance
NOP-100: Organic Fraud and the Criminal Mind
NOP-190: Sampling and Testing
NOP-220: Organic Integrity and Energy Infrastructure
NOP-998: NOP Presentations
NOP-999: National Organic Program Training Archive

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

tion, since restrictions lead to new methods. Others argued that innovators thrive if they can steer development without regulatory constraints.

These tensions reflect important choices as our organic community looks ahead with best intentions toward sustainably feeding a growing global population with farming systems adhering to organic principles.

Four years ago while negotiating another Presidential administration change, a handful of us from MOSA attended the Organicology Conference in Portland, OR. There we found a thoughtful short document, the [Middle Path Manifesto](#).

“The Middle Path viewpoint rests on the assertion that the end goal vision for both the organic trade and the organic movement is the transformation of agriculture from conventional agri-business to sustainable regenerative methods that don’t undermine our planetary life support systems. The means for accomplishing this transformation is continual and incremental use of alliances and resources that are practical for implementation at each particular point in time. Despite our urgent concerns about the need to move quickly to make organic the dominant paradigm in agriculture, we understand that at times, ‘slower is faster.’ That is, sometimes we need to accept that progress on an issue cannot proceed at our ideal pace without putting at risk elements of organic infrastructure that are very difficult to recoup if lost. In such cases, rather than charting a path that may damage existing organic systems or unduly risk precious resources and relationships, taking the ‘Middle Path’ means strategizing across organic stakeholders on incremental steps as our immediate goal while simultaneously and purposefully laying the foundation for the next progressive action toward reaching our larger end goal. This will necessitate trust, transparency, systems thinking and resolve.”

We saw these qualities at certifier training. Around 20 MOSA staff participated, starting with a couple days of material presented by NOP staff. I continue to appreciate NOP’s communication and negotiation of the nuances and requirements of our public-private partnership. Again we learned of organic enforcement’s increasing demands and its impacts on the diverse organic movement, against a backdrop of managing our capacity to ensure sound and responsible enforcement amidst changing organic demands. Here’s a look at improvements, and some tensions, as we progress in our small-but-crucial organic policy setting and enforcement sector.

NOP updates

The NOP is expanding - now with 63 staff plus improved collaboration with “many hands” at other government agencies. There’s focus on strengthening and enforcing the standards, fine tuning policy, and further developing educational tools. We heard about some streamlining of NOP complaint investigations, wherein some complaint responses are treated like inquiries, so complaints regarding someone actually breaking the organic rules can receive more investigative attention. Sound complaint investigation can take a long time. The NOP also encourages certification bodies to work together to maintain consistency, while reminding that NOP standards and policy are primary, and our certification decisions must hold up in court. There also was a strong focus on certification staff capacity, training, and capability.

Pandemic restrictions forced the NOP and certifiers to consider risk assessment and find some new tools to help more effectively use our resources. NOP risk assessment in overseeing certifiers considers factors like the number of certified operations, staff count, qualifications and expertise, financial stability, compliance history, organizational complexity, and enforcement statistics. Certifiers use similar considerations when assessing compliance risk for producers and processors.

We discussed organic dairy compliance, including when efficient checkboxes are appropriate in an inspection report, or when they unintentionally discourage sufficient information collection. Certifiers must ensure that our Organic System Plan forms collect enough information to verify compliance, and inspection reports show when inspectors must provide detail. An example is recording reasons why animals may temporarily be denied pasture access during the grazing season, not just when animals are confined. Reviewers need sufficient information to objectively determine compliance, and shouldn’t issue a certificate when needed info is missing. We also learned more about requirements for animal traceability, including recordkeeping required by other government agencies. Livestock sales facilities’ compliance will be a 2021 focus.

Changes to international organic trade

The NOP noted ongoing changes in various international organic trade arrangements, including an end to the US-India organic recognition agreement. This is ostensibly due to a lack of confidence in the current oversight of Indian products coming to the US. Organic operations

certified by India's Agricultural and Processed Food Products Export Development Authority accredited certifiers must apply for certification by USDA-accredited certifiers, by July 12, 2021. Indian certification applicants will start to be identified in the USDA Organic Integrity Database by mid-March. After July 12, 2022, NOP certification will be required for organic products imported from India.

Mexico's new Organic Products Law ("LPO," effective 12/28/2020) requires imports to be certified to LPO or be imported under equivalence. This allowed a six-month grace period for countries in equivalence discussions. Trade talks continue, but the US and Mexico do not have organic equivalence and it's not expected by the June, 2021 deadline. US organic businesses should be prepared to obtain certification to Mexico's standards to export to Mexico.

In the European Union, a Covid-related 1-year delay in implementation of new organic Regulation (EU) 2018/848 extends current US/EU equivalence until 2026. 90% of the world's organic consumption is in the EU and US. That's a lot of impetus to drive a new agreement.

Effective January 1, 2021, the US has an equivalence arrangement with the United Kingdom, including Great Britain (England, Scotland, Wales) and Northern Ireland. Terms are similar to the current equivalency with the EU. A new Great Britain Certificate of Inspection (export certificate) is required, while Northern Ireland will use the EU TRACES system.

On December 11, 2020, the Canadian General Standards Board published the revised Canadian Organic Standards. Technical discussions between the US and Canada are ongoing as equivalence continues, including seaweed trade.

A friendly heads up on enforcement

Import and export oversight will be a focus in 2021 accreditation audits. We've done a lot of educating importers regarding documentation requirements, and when imported products/ingredients do not have required NOP Import Certificates or complete supply chain records, we will be issuing noncompliance notices or not certifying new products. In an internal email today at MOSA, a seasoned reviewer commented on organic operators' responsibility, *"they should not process the product and represent it as organic until they've received the information they need to verify the supply chain. Clients are sending us this information for approval more and more (ex: is this enough? how about this? Will this do?), and I'm trying to bring the message home more clearly that it is THEIR responsibility to verify this information is in place before THEY receive ingredients, and process it and represent it as organic. It is not something we should decide and need to review every time they have a new imported ingredient - we are just verifying the records they are supposed to be keeping."* Another senior reviewer chimed in, *"It will help us immensely if/when it is clear to our clients that nothing can be certified without the NOP Import Certificate and proper supply chain records. Then we connect the dots and open the gates. So many times we are handed a metaphorical shoebox of dots that don't seem to connect - which is frustrating for us AND the clients when we then have to keep going back to them for more dots."*

In several such conversations since the training, I've heard our staff's renewed emphasis on sound enforcement of the standards and preventing fraud. MOSA Certified operators likely recognize that our service includes a considered balance of practical, reliable and friendly. We strive to use critical thinking and practical consideration as we make certification decisions. We expect our clients to also work with us, respond to requests for additional information, have required records, and ask questions as needed. Recently, we're issuing more noncompliance notices related to these expectations. Many of these are preventable, by monitoring your management systems for compliance, and attending to certification communications. Most concerns are correctable with improved attention to requirements. We'll still claim "friendly," but, noting a phrase heard a few months ago during "Coffee with the Deputy" (NOP's Dr. Jenny Tucker) - *"It's never sensible not to be sound."*

We sure have a lot to talk about. The NOP/ACA/IOIA training included multiple sessions regarding international requirements, fraud prevention, and sharing perspectives on various topic areas with other certifiers, plus numerous other topics including: Traceability, Mass Balance, and Supply Chain Audits; Livestock Hot Topics; Inspector Apprenticeships; Materials Updates (featuring MOSA Policy Manager Jackie DeMinter); Mediation and Settlement Agreements; Biodiversity and Soil Health; Dairy Compliance (featuring MOSA Certification Services Director Kristen Adams); Grower Groups; Inspections during Covid - lessons learned; Hemp Processed Products (also with Kristen!); and, Diversity, Equity, Inclusion, and Social Justice.

We also heard some regulatory progress updates from NOP. The Strengthening Organic Enforcement Proposed Rule is lengthy, and important, and the many comments received (in-

- Binders with paper records separated by tabs. Records are holepunched and then placed into the appropriate sections of the binder. Older records are archived or a new binder is set up every year or two. Producers who use this system love having all records for a year in one portable place.
- File box or cabinet with paper files. Like the binder, the small file box allows for all of the current records to be neatly organized in one location. The large cabinet is used for folders with archived records, or as the only storage area if portability isn't necessary.
- Computer-based. As more business is conducted electronically, more people use computers to store documents such as receipts, e-mail transactions, completed certification forms, and photos of production activities.
- Management software. MOSA's online certification system, MyMOSA, provides cloud-based storage of certification records. Farms and handlers can access records from multiple computers in or out of the office. There is also data collection software available that is specifically designed for certification recordkeeping such as [COG Pro](#).

THE GOAL

Developing the best recordkeeping system for each farm or processing operation depends upon the farmer or managers involved, their interest and skill with computers, the time they want to devote to creating or learning a new system, and the desire they have to use records in their operation beyond those required for organic certification.

The best recordkeeping systems are easy to maintain, easy to access, show compliance with the National Organic Standards, and provide valuable feedback about the performance of the operation.

Recordkeeping can be reduced by finding new efficiencies and working as quickly and consistently as possible. You may find that the forms provided by MOSA online, or on paper by request, will make your recordkeeping easier. We have developed these forms over many years and they are crafted with efficiency in mind.

MyMOSA, the online cloud based system, allows for even greater efficiency, with real-time input and retrieval from any Wi-Fi equipped computer or portable device. Records are required to determine organic compliance, but with a little planning, they don't have to be a chore. ■

IFOAM North America 2021 Annual Membership Meeting

MOSA is an IFOAM member, so all MOSA clients are eligible to attend this Online Meeting

Come join IFOAM North America for its 2021 annual membership meeting! The meeting will update the membership on our accomplishments and planned activities in the coming year. Louise Lutikholt, Executive Director of IFOAM—Organics International, has been invited to talk about the network reforms taking place and plans for the 2021 Organic World Congress in France.

The meeting will be held on-line from 10am-noon PDT (1 - 3pm EDT) (Noon-2pm Central) on Wednesday, March 17, 2021. Capacity for interactive participation is limited. Voting members, associates, and supporters will be given priority. In the event that the meeting registration reaches capacity, non-members will be put on a waiting list and will be admitted on a first-come, first serve basis.

An agenda and candidate profiles will be sent to members a month before the meeting.

Date And Time

Wed, March 17, 2021
12:00 PM – 2:00 PM CDT

[Register](#)

MOSA Earns NOP 2021 Director's Award for Communication

Effective oversight and enforcement of the USDA organic regulations start with robust communication. In 2020, four certifiers stood out for their open, consistent and effective communications with the National Organic Program (NOP). These certifiers held regular, candid discussions with NOP accreditation managers and auditors on a wide range of issues and day-to-day operations.

This higher level of engagement provides NOP staff increased real-time insight into the hands-on application of the USDA organic regulations. “The extra effort by these certifiers gave us practical insights and builds consistency in how certifiers apply the USDA organic regulations to farms and businesses located around the world,” said NOP Accreditation Division Director Robert Yang.

For their outstanding contributions to work in organic certification, the 2021 National Organic Program Director's Award winners are:

- [Agricultural Services Certified Organic](#) (ASCO) - Salinas, CA
- [Certification of Environmental Standards GmbH](#) (CERES) - Happurg, Germany
- [CCOF Certification Services](#) (CCOF) - Santa Cruz, CA
- [Midwest Organic Services Association](#) (MOSA) - Viroqua, WI

The NOP develops and enforces voluntary standards for organically produced agricultural products sold in the United States. Established by Congress to operate as a public-private partnership with third party organizations called certifiers, the NOP accredits and oversees certifiers who have inspectors located around the world. Certifiers play a critical role in protecting the USDA organic seal and supporting farmers who integrate biological and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.

More information on organic oversight and enforcement is available on the [NOP website](#).



CLASSIFIEDS

LIVESTOCK

HIGH QUALITY ORGANIC DAIRY GOATS

WANTED: High Quality Organic Dairy Goats for farmstead dairy. Need to be tested negative for Johnes. Call 608-767-3442 or email: diana@dreamfarm.biz.

FEDERALLY INSPECTED MEAT SLAUGHTER & PROCESSING FACILITY

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

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 54498. 715-229-2500.

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

LAND/FARMS

35 ACRES FOR RENT AND 135 FOR SALE RICHLAND COUNTY WI

35 certifiable acres for rent. Richland County WI. Akan township. Total 135 acres for sale. Stan Goplen Realty. 608 604 3581.

100+ ACRES OF CERTIFIED ORGANIC LAND FOR RENT

Possible rent to own. NE WI. Call 920-366-9038.

EQUIPMENT

LILLISTON ROLLING CULTIVATORS

Two 4 row wide Lilliston rolling cultivators for sale. One is like new with shields and many other parts. 1500 dollars for the pair. Also a buffalo scout guidance system for sale that is in good working order- \$700. Call or text (608)354-7620. Located in southwest Wisconsin.

1000 GAL LP TANK ON RUNNING GEAR

Comes with gas engine pump to refill flamer. Very nice setup. \$1200 OBO. SW WI. Call 608-553-1136. Relocating- many other items available for sale.

SIX ROW LP FLAMER

On John Deere 825 cultivator toolbar. 300 gal. tank. Lutteke flamers with fold-up shields. \$2200 or best offer. SW WI. 608-553-1136. Relocating- many other items available for sale.

EINBOCK 15' TINE WEEDER

Hydraulic fold and hydraulic tine angle adjustment. Very little use \$5000 or best offer. SW WI. Call 608-553-1136. Relocating- many other items available for sale.

LILLISTON ROLLING CULTIVATOR

Six row. 30 inch rows. New bearings. SW WI. 608-553-1136. Relocating- many other items available for sale.

FALC KAPPA 5000 ROTOTILLER

15 foot pass. Very good condition. Comes with extra tines. \$9000 OBO. SW WI. Call 608-553-1136. Relocating- many other items available for sale.

EINBOCK CHOPSTAR SIX ROW CULTIVATOR

With fertilizer boxes and finger weeders. Comes with Einbock Row-guard 500 camera guidance system. Has seen very little use. \$30,000 OBO. SW WI. Call 608-553-1136. Relocating- many other items available for sale.

FORAGES/GRAINS

CERTIFIED ORGANIC ALFALFA AND OATLAGE

4x4 round bales, barn stored or line wrapped. ~850 lbs per dry bale. Alfalfa available as dry bales (RFV 96-101%) or line wrapped baleage (RFV 138%). Oatlage from nurse crop for new alfalfa seeding. Line wrapped (RFV 101%). Additional nutrition data available. Wonewoc, WI. (920)216-2825.

CERTIFIED ORGANIC HAY

Grass / alfalfa hay, first cutting of new seeding. Baled June 5, 2020, no rain. Wrapped in-line. 44 bales, 4' x 5'. \$85 per bale. Wabasha County, MN. Contact Tom at 651 328 1872.

ORGANIC BALEAGE - DAIRY QUALITY

Various cuts and lots of dairy quality with no rain. 4x5 round bales. Price is per ton. Based on feed test and 15% moisture. There are various combinations of alfalfa, clover and grass. Delivery is available. North Central WI. Call 715-921-9079.

ORGANIC RYE STRAW

Organic rye straw for sale. 4x5" bales that are very clean. 250 bales available. 45 dollars a bale. Text or call (608)345-7620. Located in southwest Wisconsin.

CERTIFIED ORGANIC BALEAGE

4x5 round bales, roto cut, individually wrapped. First and second year transitional hay as well as oatlage are also available. All baleage is a mix of clover, alfalfa, and timothy. RFQ ranges from 120 to 180, further analysis available upon request. All cuttings are available as is delivery. Located near La Crosse, WI. Call 608-792-2952.

CERTIFIED ORGANIC HAY

4x5' round bales, roto-cut and net wrapped. Alfalfa grass and clover mix. Trucking is available. Also available, organic baleage and straw (see other ads). NE WI. Call 920-366-9708.

CERTIFIED ORGANIC STRAW

4x5' net wrapped, roto-cut round

bales. Trucking can be arranged. Also available, organic baleage and dry hay (see other ads). NE WI. 920-366-9708.

CERTIFIED ORGANIC BALEAGE

Quality tested with RFQ from 150 to 220. 1st through 4th cuttings. Individually wrapped and sliced. Approximately 3x3x5.5' large square bales. Alfalfa/grass mix. Trucking available. Also available, dry hay and straw in 4x5' round bales. Roto-cut and net wrapped. NE WI. Call 920-366-9708.

COMMERCIAL

ORGANIC SYSTEM PLAN CONSULTANT AVAILABLE

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

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/>

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.

because we knew we had the milk sold, we made the transition. That first year was a drought year. We found that those 1600 pound cows were not the best for grazing, and that is not what we have today. Our cows now average about 1200 pounds. I didn't have much to do with that change. Nature takes care of it. We started with red Holsteins and whatever we could find at the time. At auction we got some Normandys, and still have a lot of Normandy in the herd. With that base of cows we started breeding with Mount Billiards and more European breeds. We found out, and a lot of other farmers too, that you just needed time for the cows to adjust. I also saw that short horns could really take the heat, so I have a short horn bull in with the herd now. You have to build resiliency into the herd," noted Tucker.

"We milk, in the summer 60, and in the winter 46. The barn holds 50. We have a large group that freshens in the spring, and a smaller group in the fall. I was all panicky about the breeding cycle in the beginning, but it works itself out. We are not seasonal, and I would rather not be since you have to feed them year round anyway. We changed our feeding plan around. We used to feed them from carts inside the barn in the winter, but now I feed them with round bales outside. Even on cold days I can get them outside from 10-4. If it's really cold I put a lean-to on the back of the barn for wind protection. We now have a McHale round baler that wraps in the field, which makes my life a lot easier and makes for better feed."

"We have 36 acres of pasture, divided into two, and those split up into 1-2 acre paddocks just for the milking cows. In total there are roughly 150 acres of pasture that house calves, heifers and dry cows. When grass is coming really quick in the Spring, I'll take first crop hay off the West side while grazing the East. Then we'll come in and fence and graze both sides. We aim to start grazing around May 15 when the grass is about knee high. Two years ago we had a really late Spring and it was early June before we got them out on pasture. You work with what you have."

"Another thing we have found super valuable is sorghum sudan. You can get two crops with sudan. I take off first crop hay first, because the soil needs to be 50 degrees anyway. We take the bedding pack manure from the barn, spread it, and then seed in sudan. It's an amazing crop. It takes half the water, it takes half the nutrients, and it changes your soil structure. Any weed problems you have- it smothers everything out. In the fall we either chop it, or I cut it with the haybine, round bale and wrap. I use it to feed the heifers. We are nearly feed self-sufficient. I bought one semi load of hay last year. I run about 120 total head from calves on up," said Tucker.

"In 2018 we lost the pumpkin patch in a flood where we got 12-14 inches of rain in one night. We have an old earthen dam in the valley, built in 1960, and the pumpkin patch was right below. It was August 28th, 2018. When that dam broke a wall of water went through about 25

acres. We lost everything in the pumpkin patch. They found one of the wagons we used for tours 16 feet up in a tree. The kids were devastated by the pumpkin patch flood, but half the fun was building it, and now we're building it again. We're doing everything in tents for now, but we'll rebuild as we can. The kids have started selling hanging flower baskets and we added a woodfired pizza oven. Becky has an interest in other animals, so



we'll add a chicken coop. We're also adding a projection wagon for outdoor movies and a greenhouse. We'll keep things rolling and see what works and fits. Maybe the kids will want to take over and we'll try to help them in any way possible."

www.facebook.com/TuckerAndBeckysPumpkinPatch/ ■

REMINDER



2021 Update Forms and Fees are Due April 1

Please submit your update application and fees by April 1 to avoid noncompliance and late fees.

cluding [MOSA's Comments](#)) are now being compared to USDA's internal policy papers. It's hoped a stakeholder-informed Final Rule will move into clearance in 2021, and there's consideration whether that can proceed in segments. Other policy considerations await briefing and determination of next steps with the new Biden administration, when fully appointed. These include the Origin of Livestock Proposed Rule, and certifier inconsistencies in interpreting greenhouse requirements.

New Secretary of Agriculture

As of this writing, it looks like Tom Vilsack will be confirmed as the new Secretary of Agriculture. The former Iowa Governor also served as Ag Secretary under Barack Obama. In his Senate Ag Committee [confirmation hearing](#), [Vilsack named four priorities](#): 1) addressing climate change via paying farmers to sequester carbon; 2) addressing hunger and food insecurity; 3) promoting open, transparent, and fair markets; and 4) addressing discrimination and inequities in USDA programs, including some organic community priorities. Vilsack mentioned organic a few times, including food supply chain diversification and farm to institution programs (regarding lost markets due to the pandemic). He also spoke to food hub creation, farmers markets, small processing infrastructure, assistance for organic transition, completing the Origin of Livestock rule, and organic's impact on President Biden's goal for zero net emissions in agriculture.

MOSA weighs in with NOSB

In October, we also listened in and spoke out at the online National Organic Standards Board (NOSB) meeting. The NOSB passed four new proposals, now referred to USDA for implementation. These include a petition to allow low acyl gellan gum in food processing, recommended restrictions on sources of fish and seaweed used in fertilizers, and an extensive list identifying 2020 organic research priorities. Rejected proposals included Sodium Carbonate Lignin (in crop production as a dust suppressant), and Fenbendazole (as parasiticide for laying hens). Discussions regarding Paper-Based Planting Aids (crop production), and Ion Exchange Filtration (handling) went back for more subcommittee work.

The NOSB also voted to remove National List allowances for kelp, seaweed potato starch, Turkish bay leaves, whey protein concentrate, and eight natural colors, and, asked for USDA action toward a viable alternative system for reviewing inert ingredients, to replace the outdated allowance for EPA List 4 Inerts.

The NOSB also considered five discussion doc-

uments at this meeting, with subjects including ammonia extract fertilizer prohibition, Biodegradable Biobased Mulch Film, prohibiting nonorganic Whey Protein Concentrate in food processing, and adoption of a consent agenda voting procedure.

MOSA provided written comments on: Marine Macroalgae in Crop Fertility; Wild, Native Fish for Liquid Fish Products; Paper-Based Crop Planting Aids; Human Capital Management; Biodegradable biobased mulch; and EPA List 4 Inerts. These can be found [on our website](#). Jackie DeMinter provided informed verbal testimony on paper, mulch film, liquid fish, marine macroalgae and sunset materials - all in three minutes.

The new “Human Capital Management” discussion regarding developing and retaining qualified organic inspectors and reviewers is very important to our enforcement work. Here too, there are tensions with best intentions. In my verbal testimony, I noted, *“We support strong standards to maintain organic success, fill gaps, and uphold trust. Usually, we find improvements are well-targeted, but we’re conflicted as these often place more burden on certifiers. Our capacity is pert near tapped out, and more requirements can make certification less accessible. Sometimes, regulatory process gets in the way of our organic vision for a ‘thriving organic world.’ That vision includes all in this movement. It seems no new rule simplifies processes for the humans involved in our work. Reviewers and inspectors feel burnout when their work becomes detail-obsessed; managers are challenged to align systems, communication and training with new requirements; and, farmers spend more time on records and pay more for certification as we try to stay fiscally sound. So, as we improve our label, we also look for practical respite, where risk assessment might lighten some burdens. ...Certifiers can’t continually fund our burdens on the backs of organic farmers, especially in this uncertain global landscape. We ask for federal organic fiscal, research and policy support to be on par with that for conventional agriculture.”*

The [Spring NOSB Meeting](#) will again be live online, from April 20 to April 30, 2021. You also are encouraged to use your voice. Stay tuned for comment opportunities in late February or March. The discussion documents and continuing subcommittee items noted above are back on the work plan. Other expected agenda items include: evaluating new technologies against the current excluded methods definition; 2021 research priorities; prohibition of fish oil from fish caught directly for the sole use of its oil, and from overfished or exploited species and regions; and 2022 sunset materials reviews. New input petitions include Tall Oil, Distilled (an inert crop and livestock pest control ingredient), Chitosan (crop disease control and as coagulant for fertilizer, and as a livestock feed processing aid), cow-manure derived biochar (soil amendment), Kasugamycin (for fire blight control), Hydronium (as pH adjuster in dehydrated manure fertilizer production), Cetylpyridinium chloride (anti-microbial processing aid for poultry processing), Phosphoric acid (pH adjuster for extractions of Lamiaceae family plants), and Zein (processing aid and glaze in food handling).

Suffice it to say we have a lot to consider as we move forward. Keep calm and carry on. And for now, never mind that saying about the journey and good intentions.

*Milestad, R., Rööös, E., Stenius, T. et al. Tensions in future development of organic production—views of stakeholders on Organic 3.0. *Org. Agr.* 10, 509–519 (2020).

<https://doi.org/10.1007/s13165-020-00312-4> ■



MOSA

CERTIFIED ORGANIC

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

NON-PROFIT ORG.

U.S. POSTAGE PAID

PERMIT No. 588

LA CROSSE, WI

— the — ORGANIC Cultivator

VOL. 19 ISSUE 1 SPRING 2021

MOSA BOARD OF DIRECTORS

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

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

Beth Unger, *Secretary*
madrepadre@gmail.com

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

Altfrid Krusenbaum, *Director*
krusen@krusengrassfarms.com

Carla Wright, *Director*
savanna@chorus.net

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