



the ORGANIC Cultivator

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Help Wanted: Participate in Our Organic Regulatory System

By Stephen Walker, Accreditation & Industry Affairs Manager

Continuous improvement is key to our organic movement and our organic regulatory system. MOSA brings a strong national voice toward improving organic. We aim for stronger standards, with practicality and keeping organic accessible, and our regulatory work is driven by recognizing how [organic agriculture offers solutions](#). Our work - your work - helps address hunger and malnutrition, poverty, water use challenges, climate change, and unsustainable production and consumption. There's great value in participating in continuous improvement of our regulatory systems. It's rewarding work, and we encourage you to join in.

NOSB

One way to participate is by offering your perspective at the semi-annual National Organic Standards Board (NOSB) meetings, which help the USDA develop and refine our standards. NOSB public comment webinars are April 19th and 21st. The public meeting is April 26th-28th. It's all online again, so it's easy to participate - no need to travel. Full details are on the [NOSB Spring 2022 Meeting webpage](#). This meeting's documents related to Program improvement and organic materials are detailed below.

In November, the National Organic Program (NOP) sent a [memo](#) requesting NOSB review and public comment facilitation on the *NOP Risk Mitigation Table*, which documents how NOP safeguards against potential conflict of interest in accreditation oversight of certifiers. The Certification, Accreditation and Compliance Subcommittee (CACS) found that all potential conflicts of interest



FROM THE DIRECTOR

Cori Skolaski, Executive Director

By the time you read this, you will have submitted your annual update paperwork to MOSA that was due on April 1. As always, the next step in your certification process is an initial review, completed by a MOSA Certification Specialist, and then - your annual inspection.

Several weeks ago we mailed your Organic System Plan that we have on file; please review it to see if everything is current. If something additional has changed beyond the information you supplied to us in your annual update be ready to discuss it with your Inspector. Our goal is to make your inspections more efficient and to reduce the

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are included and are clear.

The CACS is continuing discussion regarding “Human Capital Management” needs, with a “NOSB Technical Support Initiative” document. This initiative’s rationale is simple. NOSB work isn’t paid, and many Board members have full time jobs. NOSB members’ workload can take 10-15 hours per week. This limits the number of people willing to seek Board mem-



bership. Additional technical support could make voluntary NOSB work more tenable and attractive. Commenters were supportive, but expressed some concerns including not compromising process integrity and autonomy.

The CACS is also continuing discussion on fraud deterrence and *Modernization of Supply Chain Traceability*. With improvements, organics may be able to claim being the most traceable food system in the world. Consumers expect a transparent organic supply chain. More consistent supply chain data reporting is an NOSB priority. This document highlights two low burden key elements that can aid in deterring fraud: 1) *reporting acres per crop* on operator certificates and 2) *a universal bill of lading*. The forthcoming Strengthening Organic Enforcement (SOE) rule may require crop acreage reporting. Acreage data, as confidential business information, would only be available to certifiers. But, that leaves a transparency gap for buyers and inspectors. As to the bill of lading, certifiers will be improving auditing forms to satisfy requirements in the new Origin of Livestock (OOL) rule. That’s an opportunity for certifiers to collaboratively develop forms so dairy inspectors know to ask consistent questions and can expect specific data needed for rigorous OOL audits. Similarly a “universal bill of lading” for all agricul-

tural commodities would aim to require consistent reporting information in organic transactions where bulk goods change form or are aggregated. Transaction documents would require unique lot numbers, crop year grown, transaction date, crop, and buyer and seller names.

The Handling Subcommittee is recommending to *not* approve a petition to add *cetylpyridinium chloride* to the National List as an antimicrobial processing aid on poultry or poultry parts at slaughter or processing plants. Concerns included residues on surfaces and poultry, whether expansion of organic’s sanitizer toolkit is essential, and review pathway complications because the material requires use of an inert in its formulation

The Handling Subcommittee is proposing to *amend phosphoric acid’s National List annotation* to also allow its use “as an acidifier to adjust pH of an extraction solvent to extract antioxidants or other target molecules from *lamiaceae* plants, provided the amount of acid used shall not exceed the minimum needed to lower pH to 2.5.” The review considered phosphoric acid’s essentiality as the most effective pH adjustment acid, its low negative health impacts, and some uncertainty regarding exactly how this is going to be used.

The Materials Subcommittee will continue discussion on *organic research priorities*, and will discuss a petition for *Distilled Tall Oil* intended to be used in crop and livestock production as an inert ingredient and as a solvent, sticker, anti-leaching agent, and time-release agent in pesticides. The Subcommittee also has a proposal to clarify *cell and protoplast fusion’s* positions in excluded methods determinations. Uses between taxonomic plant families are determined to be prohibited. Some uses between the same taxonomic plant families could be allowed.

The Crops Subcommittee is proposing to prohibit *highly soluble nitrogen (HSN) fertilizers* with a C:N ratio of 3:1 or less, including in blended fertilizers, unless use is 20% or less of crop needs. Comments from long-time organic organizations and growers tended to favor limiting HSN fertilizers based on the organic principle of enhancing soil biology rather than applying immediately available plant nutrients. They also noted that low carbon to nitrogen ratios and the high solubility could cause environmental issues. Proponents cited the need for immediately available nitrogen

need to request more information before we can make a certification decision. Ultimately, we'll all save time and money by having up-to-date and accurate information available at your inspection.

Some other 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.

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 or inspection fees, and view and print your organic certificate. Over one-third of our clients have gone paperless, and find it very convenient.

In February at our annual Board of Directors meeting, we said a fond farewell with our deepest appreciation to Keith Ashley-Wright for his service as the President. Lizzy Haywood was appointed President, Laura McBride was appointed Vice President, Alfrid Krussenbaum was appointed Treasurer, and Beth Unger was reappointed Secretary. Thanks to all of MOSA's board members for their guidance and support!

We are looking to recruit new MOSA Board members, so if you know someone who might be interested, please have them reach out to me at my email below. MOSA Board members cannot be currently certified with MOSA.

This newsletter is chock full of information we hope you find helpful. There are a lot of current and future developments in the policy and regulatory compliance areas highlighted in this issue. We are proud to be at the forefront of advocating for our client's best interests, and we encourage you to join us in engaging the NOSB and USDA NOP. Your input is very important!

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 844-637-2526. Thank you for reading, and thanks for your continued commitment to organic integrity.■

sources as a bridge for when unusual events cause nitrogen deficits to crops, and soil processes have not had a chance to recharge the available nitrogen. They also note that these materials can help prevent nitrogen loss through targeting of nitrogen applications to specific crop needs.

The Crops Subcommittee also recommends allowing synthetic *carbon dioxide* for organic crop production use as an algicide, disinfect-



tant, and sanitizer, including irrigation system cleaning systems and as a plant or soil amendment. Carbon dioxide has inherently low risk and is approved as a processing aid. Since it's synthetic, Subcommittee discussions considered its need or benefits over other allowed alternatives.

The Policy Development Subcommittee is proposing minor clerical changes to the NOSB Policy and Procedures Manual for *public comment process clarity*. They propose adding a sentence requiring written commenters to refrain from personal attacks.

The meeting agenda also begins the 2024 *sunset review process* to decide whether current materials should stay on the National List of allowed and prohibited substances. For crops, inputs up for re-review are: soap-based herbicides, biodegradable biobased mulch film, boric acid, sticky traps/barriers, elemental sulfur, fixed coppers, copper sulfate, polyoxin D zinc salt, humic acids, micronutrients (boron, and sulfates, carbonates, oxides or silicates of zinc, copper, iron, manganese, molybdenum, selenium, and cobalt), vitamins B1, C, E, squid byproducts, lead salts, and tobacco dust. For *livestock*, sunset reviews include: chlorhexidine, glucose, tolazoline, copper sulfate, elemental sulfur, and lidocaine. And for *handling*, potential sunsets include: (non-agricultural materials) - attapulgit, benton-

ite, diatomaceous earth, magnesium chloride, nitrogen, sodium carbonate, acidified sodium chlorite, carbon dioxide, and sodium phosphates, and (norganic agricultural materials) - casings, pectin, and potassium acid tartrate.



Four new NOSB members will join the April meeting. Liz Graznak (Missouri) is appointed to an environmental protection and resource conservation seat. She operates an 82-acre organic vegetable farm, has an Environmental Studies degree, and has shown a commitment to sustainable agriculture during previous Board appointments. Allison Johnson (California) fills a public/consumer interest group seat. She works for the Natural Resources Defense Council, is an attorney with organic regulations and certifier experience, and has focused her work on sustainable food systems. Dr. Dilip Nandwani (Tennessee) fills the scientist seat. He's a Tennessee State University professor with a Botany Ph.D. His 10-years of teaching experience include a focus on organic agriculture, certification, and crop science. And, Javier Zamora (California) is appointed to a farmer seat. He operates a 100-acre vegetable/fruit farm and has 20 years of farming experience. He's provided farmers assistance with direct marketing regulations, organic compliance, and developing direct marketing channels.

Organic Farming and Climate-Smart Agriculture

In response to a letter the NOSB recently sent to Secretary of Agriculture Vilsack, the NOP has asked the NOSB to start a dialogue about the links between organic farming and climate-smart agriculture. The Biden Administration is committed to curbing climate change, and USDA is interested in developing

and rolling out climate-smart agricultural strategies and resources for producers. The NOSB letter emphasized how organic agriculture exemplifies the climate-smart agriculture principles and so should play a prominent role in USDA work to reduce agriculture's carbon footprint.

The USDA recently published a [supply chain report](#) - "USDA Agri-Food Supply Chain Assessment: Program and Policy Options for Strengthening Resilience." This looks at vulnerabilities and current federal actions to secure and strengthen supply chains, prompted by President Biden's February, 2021 [executive order](#), and informed by public comments. The report highlights organic as a model for climate-smart agriculture and delivering value-based market incentives that support food system diversification. Key organic supporting policies include allowing sourcing organic for food procurements, removing barriers and improving access to USDA loans and grant programs for organic producers, ensuring that USDA efforts on climate-smart agriculture enable organic producers to access and inform those efforts, expanding investments in USDA's Organic Research and Education Initiative, and establishing programs across USDA to incentivize transition to organic.

Listening Session

A [March 21st NOP listening session](#) sought comments to help prioritize its standards development work, including past NOSB recommendations. Comments are NOT sought for rulemaking priorities already in progress, including the SOE Final Rule, OOL Final Rule, Organic Livestock and Poultry Standards (OLPS), or Inert Ingredients in Pesticides for Organic Production. Comments are sought regarding the current NOP structure's effectiveness (with six subdivisions including the Office of the Deputy Administrator) in supporting the Program's mission. And comments are sought regarding the prioritization of outstanding NOSB recommendations and NOP Handbook updates (specifically, comments on whether issues not currently included should be considered for regulatory action). Some unaddressed NOSB recommendations date back many years. These include recommendations related to apiculture, pet food, hydroponic/aeroponic/greenhouse/containers, mushrooms, aquaculture, livestock emergency parasiticide use, native ecosystems conversion, commercial availability determination criteria, organic seed use, genetic engineering and excluded methods

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determinations, personal care products, and livestock vaccines from excluded methods. MOSA has commented on most of these issues over the years and has weighed in again- [MOSA Commentary](#).

NOP and ACA Training

An annual continuous improvement time marker is annual training for certifiers, inspectors, and others working with the organic standards, presented by the NOP and the Accredited Certifiers Association. We were pleased we could register all MOSA certification staff for these January and February training sessions. In fact, over 800 folks registered for the NOP sessions.

USDA's Organic Priorities include: addressing climate change via climate-smart agriculture; advancing racial justice, equity and opportunity; creating more and better market opportunities; tackling food and nutrition insecurity; and making USDA a great place to work for everyone. NOP's 2022 goals include: strong organic control systems, robust enforcement, developing standards, and engaging stakeholders. The new SOE, OOL, and OLPS rules are in clearance or already under management and budget office review.

We heard about areas where certifiers' work can improve, including information sharing with other certifiers, checking certification applicant histories, and assessing our administrative capacity before taking on more work. NOP stressed the value of Organic Integrity Learning Center (OILC) educational tools.

Other sessions covered: NOP's risk-based oversight of certifiers, material review audits, remote inspections during COVID, import certificates' data and fraud prevention capabilities, a recap on imports and international investigations, NOP Compliance collaboration with certifiers, complaints review processes and complaint filing best practices, current human capital projects and organic workforce planning, and certifier audit summaries. Upcoming certifier accreditation audits will focus on certifiers' staff expertise, capacity, annual program reviews, material review programs, livestock operations' compliance, and natural resources and biodiversity conservation. We heard a lot about improving livestock producers' compliance enforcement, including necessary recordkeeping and inspector verification. Upcoming OILC livestock-related training updates will include verifying temporary confinement, evaluat-

ing actual feed fed, and calculating weighted averages of dry matter intake from pasture.

I was impressed with the thoughtfulness and cooperative spirit shown by fellow certifiers, inspectors, and NOP staff as we aim to improve our work. NOP Deputy Administrator Jennifer Tucker commented that, "In organic, all the easy stuff has already been figured out. Only the hard stuff remains."



The sessions concluded with a thought-provoking keynote presentation on diversity, equity, and inclusion in the organic industry. Discussion about how we attract and retain staff and inspectors emphasized the value of transferable skills in folks with different backgrounds, and how life experience can outweigh "checkbox" credentials. We can train for particular skills, and many backgrounds can find a place in our agricultural work. One presenter commented, "Don't try to fit in or be what you're not. Be who you are to make an impact."

Considering our legacy

As I consider our continuous improvement efforts and the global importance of this organic movement, I'm also thinking about our legacy. What values will we leave with our descendants? It's not lost on me that I'm writing this near my dad's birthday, after he passed away last April. He planted many good seeds over his lifetime and some of those are growing in me. And on our local radio station this past week, I heard a "[Who's in the Kitchen](#)" interview with an old friend, Catherine Young - educator, farmer, and writer. She talked about homesteading, seed saving, and shared some poetry. I was particularly intrigued by her thoughts on the seed rematriation movement in indigenous cultures, which recognizes how humans and

CERTIFICATION POLICY UPDATE

by Jackie DeMinter, Certification Policy Manager

National Organic Program Proposed Rules

The U.S. Department of Agriculture's (USDA) Agricultural Marketing Service (AMS) National Organic Program (NOP) proposes amendments to the National List of Allowed and Prohibited Substances (National List) section of the USDA's organic regulations to implement recommendations submitted to the Secretary of Agriculture by the National Organic Standards Board (NOSB). Find the proposed rule here: [National List Proposed Rule: Document Number AMS-NOP-21-0060; NOP-21-02](#)

Proposed Changes:

Paper-based Crop Planting aid: The rule proposes to add paper-based planting aids to the National List for use in organic crop production. The proposed rule would add to §205.2 Terms Defined: *Paper-based crop planting aid. A material that is comprised of at least 60% cellulose based fiber by weight, including, but not limited to, pots, seed tape, and collars that are placed in or on the soil and later incorporated into the soil, excluding biodegradable mulch film. Up to 40% of the ingredients can be nonsynthetic, other permitted synthetic ingredients at §205.601(j), or synthetic strengthening fibers, adhesives, or resins. Contains no less than 80% biobased content as verified by a qualified third-party assessment (e.g., laboratory test using ASTM D6866 or composition review by qualified personnel). Added nutrients must comply with §§205.105, 205.203, and 205.206.*

In addition the rule also proposes to amend §205.601 by revising paragraph (o) to include as follows: *§205.601 Synthetic substances allowed for use in organic crop production.*

(o) Production aids:

(2) Paper-based crop planting aids as defined in §205.2. Virgin or recycled paper without glossy paper or colored inks.

We encouraged clients using paper-based crop planting aids to comment. MOSA is poised to re-review products currently approved to ensure continued compliance with a final rule when published, however we urge manufacturers to list with the Organic Materials Review Institute (OMRI) to ensure consistency determining allowance.

Wood Rosin: The rule proposes to correct the spelling of wood "resin" found at §205.605(a) to "rosin."

Low-acyl gellan gum: The rule also proposes to add low-acyl gellan gum, a food additive used as a thickener, gelling agent, and stabilizer; and paper-based crop planting aids to the National List, to §205.605(b) as a nonagricultural synthetic substance allowed for use in "organic" and "made with organic" processed products.

Comments were due by April 4, 2022. You can view all comments submitted on this proposed rule to the Federal eRulemaking Portal at <https://www.regulations.gov/>.

National Organic Program Final Rules

A NOP Final Rule was published on 2/28/2022 which removes fourteen ingredients and two substances from the National List and retains (or "renews") two substances on the National List. Find the final rule here: [National Organic Program; Amendments to the National List of Allowed and Prohibited Substances \(2022 Sunset\)](#). This rule is effective on March 30, 2022.

This final rule removes the following synthetic substances, which are currently allowed in organic crop and livestock production (§§205.601 and 205.603):

Vitamin B1 (crop production); and
Procaine (livestock production).

The compliance date for the amendments that remove vitamin B1 and procaine from the National List is March 15, 2023. *Farmers will need to discontinue use on or before this date.*

Additionally, NOP is removing the following nonorganic ingredients, which are currently allowed in organic handling (§§205.605 and 205.606):

- Alginic acid
- Colors (black currant juice color, blueberry juice color, carrot juice color, cherry juice color, grape juice color, paprika color, pumpkin juice color, turmeric extract color)
- Kelp
- Konjac flour
- Sweet potato starch
- Turkish bay leaves
- Whey protein concentrate

The compliance date for all of the handling materials is March 15, 2024. *Processors will need to discontinue use of any of the above ingredients on or before this date.* Products in the stream of commerce after the compliance date that are labeled as “organic” or “made with organic (specified ingredients or food group(s))” may contain substances removed in this final rule if manufactured prior to the compliance date. *We encourage manufacturers using any of the above ingredients to proactively source alternatives and to communicate your plan for discontinuance to MOSA.*

Finally, this rule renews sucrose octanoate esters for organic crop and livestock production and oxytocin for organic livestock production. The new sunset date for the two substances (three listings on the National List) is March 15, 2027.

A NOP Final Rule published 3/23/2022 adds two materials to the National List and removes one material from the National List. Find the final rule here: [National Organic Program: National List of Allowed and Prohibited Substances, Crops and Handling from October 2019 National Organic Standards Board](#). This rule is effective on April 22, 2022.

This final rule adds potassium hypochlorite - for use in water for irrigation purposes to §205.601(a)(2) in organic crop production. This amendment allows the use of potassium hypochlorite in organic crop production for the purposes of cleaning irrigation equipment and treating irrigation water and does not extend to other uses.

Additionally, this rule amends the National List to add fatty alcohols (C6, C8, C10, and/or C12) to §205.601(k) plant growth regulators as a synthetic substance allowed for sucker control in organic tobacco production. The fatty alcohol designations C6, C8, C10, and C12 correspond to 1-hexanol, 1-octanol, 1-decanol, and 1-dodecanol. Fatty alcohols can be derived from fats or oils (most commonly coconut oil, palm kernel oil, lard, tallow, rapeseed oil, soybean oil, and corn oil) or from petroleum products. Applying fatty alcohols to tobacco plants, generally in the presence of a surfactant (which must also be allowed), selectively kills or inhibits sucker (secondary stems) growth. Fatty alcohols have been deemed necessary to provide a safer and effective method of de-suckering tobacco plants. Removal of suckers facilitates growth of the harvestable leaves, reduces pest pressure, and increases crop yield. §205.206(e) restriction applies.

Finally, this rule removes the individual listing for dairy cultures from §205.605(a), however the removal **will not affect** the allowance of dairy cultures in organic production and organic products since dairy cultures will continue to be allowed under the microorganisms listing also in §205.605(a).

Update to Civil Monetary Penalty Amount --Inflation Adjustments for 2022

A [final rule](#) effective February 15, 2022 adjusted the monetary civil penalty amounts to account

for a 5+% inflation rate. The new *maximum* amount for violations in the organic sector is \$20,130. Civil penalties are assessed to operations knowingly labeling or selling a product as organic except when sold in accordance with the National Organic Standards.

Reminder - Selling Dairy Livestock?

Don't forget to provide the animal's identification and organic slaughter eligibility status to the buyer, slaughter facility or sales facility. Animals must be individually identified (i.e. ear tags in place). Removable back tags are not sufficient to maintain organic traceability. Your livestock sales records will need to clearly trace back to your Livestock List showing individual animals' organic slaughter eligibility. If you sell organic livestock either independently or through a sales facility, your records will need to show how you verify slaughter eligibility for buyers of your organic livestock. If an animal's slaughter eligibility is not clear, MOSA automatically assumes that animals are not organic eligible. MOSA has created a new Slaughter Eligibility Verification form for sellers to provide to their buyers. Include a copy of your certificate with this form when presenting it to your buyer or sales facility. Contact the MOSA office to request a copy of this form be sent to you or download it from our website.

Biosecurity and avian influenza are recent topics to pay attention to with confirmed cases of highly pathogenic avian influenza (HPAI) in several states. As a reminder, the NOP has advised us that if local, state, or federal health authorities determine that additional action is needed in the areas we certify due to a direct threat in your area, we are to work with our clients to determine what emergency measures are necessary, and for how long. If you become aware of a threat in your area, contact MOSA to discuss your plans. Be sure to update your Organic System Plan with information about all animals on your operation, including nonorganic poultry. ■

plants evolve together. Fedco Seeds says of rematriation, "Seeds represent food, and they also represent culture and relationships. All across the world, people and seeds are asking to be reunited so that old agreements can be renewed."

Seeds have always been among my favorite metaphors. They provide hope for the future as they link to the past.

In that vein, our organic movement's future is hopeful. According to data from 190 countries, FiBL and IFOAM – Organics International's 23rd edition of "[The World of Organic Agriculture](#)" shows that the global organic market had its highest growth ever in 2020, even against the backdrop of the pandemic. The U.S. continued as the leading organic market. There are 3.4 million organic producers worldwide, a steady increase of organic farmland, and in 18 countries, at least ten percent of farmland is organic. Indeed, that's a lot of help, and a nice legacy as IFOAM celebrates its 50th anniversary in 2022.

Help Wanted

From thinking globally to acting locally, I'd again invite you to consider ways you might join in, from plugging away with purpose, to commenting on our continuous improvement efforts, and even to considering joining organic's regulatory work force. As MOSA and this community continue wrestling with capacity concerns, we recognize that many of you may have skills to bring to our daily work. We're looking for organic inspectors, review staff, and seasoned organic perspectives from folks with applicable skills and passion for what's best about organic. Whether you're planting organic seeds literally or metaphorically, we're grateful for your community engagement. ■



Mass Balance and Traceback Inspection Audits Explained

By Joe Pedretti, Client Relations Director

Audits are one of the tools used by organic inspectors and certification agencies to verify the USDA NOP recordkeeping and compliance requirements of §205.103 and NOP Instruction 2601 are being met.

§205.103

(a) A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)).”

(b) Such records must:

1. Be adapted to the particular business that the certified operation is conducting;
2. *Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;*
3. Be maintained for not less than 5 years beyond their creation; and
4. Be sufficient to demonstrate compliance with the Act and the regulations in this part.

(c) The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program’s governing State official, and the certifying agent.

NOP Instruction Document 2601

“8. Reconciliation of the volume of organic products produced or received with the amount of organic products shipped, handled and/or sold, also known as traceback audits or in/out balances;”

MOSA’s 2021 NOP accreditation audit (similar to your annual inspection) showed areas where we need to increase our verification of your recordkeeping systems. Our 2021 NOP auditors noted a need to conduct more, and more thorough inspection audits. The NOP is stressing the need for stronger, more detailed audits and the verification of recordkeeping systems, especially in preparation for upcoming changes to the organic regulations.

Audits are an important tool to prevent fraud and ensure that sufficient recordkeeping exists to verify organic integrity.

For each operation’s annual inspection a minimum of one traceback audit will be conducted.

A *Trace-back Audit* is used to show that an organic product can be traced back to its field of origin or supplier, using information such as lot numbers, invoices, or field activity records.

A *Mass Balance (In/Out) Audit* is used to show that enough organic ingredients were purchased or that crops produced, harvested, and stored coincide with your sales, or with production records of the final prod-

uct. Think of a Mass Balance Audit as a weight scale; the amount of product you use or sell must match the amount of product you produce or purchase. Your inspector will look at records for a specific timeframe (for example, May through September).

Let’s look at some examples of potential records and/or recordkeeping systems that will allow an inspector to complete a successful audit:

Producer - Crops

Activity: Purchasing Seed or Seedlings
Records: Invoice/Receipt, Organic Seed Search (if applicable) and Organic Certificate

Activity: Sowing, Seeding, Transplanting
Records: Planting Log/Field Records (with dates, locations & amounts)

Activity: Harvest & Storage or Sale
Records: Harvest Log/Field Activity Records (date, location, amount), Storage Inventory Form, Sales Records (invoice, purchase order, transportation documents)

Producer - Livestock

Activity: Purchasing Feed
Records: Invoice/Receipt, Organic Certificate, Storage Inventory Form

Activity: Harvest Feed Crops
Records: Field Activity Records (harvest date, field & yield)

Activity: Feeding Animals/Grazing
Records: Daily Feeding Records, Ration Workbook, Storage Inventory Form

Handler/Processor

Activity: Purchasing Ingredients
Records: Ingredient Invoices, Receiving Log, Organic Certificates

Activity: Product Manufacturing
Records: Production Records (Date, Quantity, Lot Codes, Storage Records)

Activity: Packaging and Sales
Records: Invoices, Inventory Records, Transportation Records

MOSA Clients should prepare for these inspection audits by ensuring that all of the records/documentation necessary to conduct the mass balance and traceback audits are complete, accurate and available during your annual inspection. Unless otherwise instructed by MOSA, your inspector will decide which audit(s) will be used at your inspection. The audit of records can be the longest portion of your inspection and is most efficient if your records are current and complete before your inspector’s arrival.

Thank you for your dedication to organic integrity. Please contact MOSA if you have questions about audit expectations, or for recordkeeping forms and guidance. ■

CLASSIFIEDS

LIVESTOCK

BEEF HERD REDUCTION SALE

Overstocked! Herd reduction sale. Black angus and angus crosses. You pick 10-12 pregnant cows from our herd of 45 cows and heifers. Cattle are bred to either a registered Hereford or a short horn bull. Bulls can be seen at farm. 100% grass-fed and certified organic. Near Green Bay. Rick Adamski, (920) 373-7105.

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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.

LAND/FARMS

300 ACRES ORGANIC LAND FOR RENT - WI

Have land in Lebanon, WI area that has been certified organic, but the previous renter is not able to rent in 2022. About 300 acres. Call 920-261-9752 or bojjoypei-rick@yahoo.com.

PASTURE FOR RENT

140 acres of pasture for rent. Native grasses with two water sources, crick and well water. Near Viroqua, WI (Dach Ridge). 608-632-3579 or email at dachridge@yahoo.com

EQUIPMENT

RAIN FLO 1600 SERIES II WATERWHEEL TRANSPLANTER

Rain Flo 1600 Series II Waterwheel Transplanter with two 12" wheels and one 24" wheel. Retiring from organic produce production. Located near Beloit, WI. Call David. 815-509-7278.

6 ROW 30" PROPANE FLAMER, TANK & TRACTOR

6 Row 30" Propane Flamer for tractor front mount. 120 gallon tank. Sold with or without tractor. Call for more info. Central MN. 320-557-7336.

WANTED: 6 ROW 725 FRONT MOUNT CULTIVATOR FOR JOHN DEERE 4020

Located near Arcadia WI please call 608-863-1872 with your information. Thanks, Ericka w/ S&S Grains LLP.

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/>

HORSE DRIVEN IMPLEMENTS

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

EMPLOYMENT

ORCHARD/VINEYARD PERENNIALS MANAGER

Gwenyn Hill Farm is a diverse certified organic farm 40 minutes west of Milwaukee. We are searching for someone with experience in perennial fruits and organic or IPM production. This manager is responsible for the care, maintenance and planting of the varied perennial fruits. Crops include a 4 acre orchard of tree fruit and berries, a 1/2 acre vineyard of hardy table grapes. New installations include asparagus and rhubarb. Full Time, Salaried. Compensation based on experience. Details at: <https://gwenynhillfarm.com/careers/> Send resume and references to farmer@gwenynhill.com

FULL TIME FARM HAND

Organic Dairy farm looking to hire a full time farm hand. Experience preferred but not required. We offer competitive wages plus overtime pay on Sundays and Holidays, bonuses, health and dental insurance and 401(k). 35-45 hours/week, every other weekend off. Located in Columbus, WI. 608.825.0168. millerinc@frontier.com. www.rgmillerfarms.com.

FARMHANDS FOR ORGANIC VEGETABLE FARM

Tipi Produce is a certified-organic vegetable farm located 35 minutes south of Madison, WI. Join our lively farm crew and work outside in a healthy environment. We have several openings for people available to work from mid-May through October or November. Learn more and apply at <https://www.tipiproduce.com/employment/>

ORGANIC GARDENING PROFIT SHARE PARTNER

Looking for someone that we can LEAD our grow operations with some help from the owners. Owners will be primarily focused on maintenance and construction. Willing to provide Room/Board and Profit Share the first year. If successful, we will strongly consider a salary next year. We are just outside of Madison, WI, 80 acres, certified via MOSA, 6 greenhouses, grow rooms, lighting, tractors, irrigation, chicken operation, and on farm store. Call for details. 608-509-5021.

EXPERIENCED ORGANIC/BIO-DYNAMIC FARMER/GARDENER NEEDED

Guaranteed salary of \$50,000 a year to start. 4 acre property in SE WI with successful anthroposophic-homeopathic pharmaceutical manufacturing company employing 20 people. Your job: build a permaculture paradise to promote food security by growing and processing vegetables, small fruits and a few apple and pear trees. Include chickens, sheep/goats and/or a cow for milk and manure. Contact Mark: mark@urielpharmacy.com N8464 Sterman Road, East Troy WI 53120

PACKING SHED SUPPORT & OFFICE SUPPORT SPECIALIST

Looking for individuals with excellent organizational and communication skills to join our team in these capacities. Both positions encompass a variety of roles and responsibilities that, ultimately, keep our operation running smoothly and efficiently. These positions are full-time and year-round. Starting wage is \$15-\$16/hour plus additional benefits. Please visit our website for the full job descriptions. <http://harmonyvalleyfarm.com/opportunities.php>

FARMERS WANTED

The Wright Way Farm, located in southwest Rock County near Beloit, WI is an established certified organic vegetable farm. We are seeking an experienced grower to join our team for the 2022 season and possibly beyond. 30-40 hours/week, \$15/hr - \$17/hr, depending on experience. Overtime and paid holidays. Duties include, but not limited to, planting, harvesting, weeding, markets, and other misc. farm tasks. If you are interested, send a resume to: thewrights@thewrightwayfarm.com.

FIELD CREW MEMBERS NEEDED

Squashington Farm (Mount Horeb, WI) is looking to hire 3 part-time Field Crew Members. Starts at \$14/hour, plus a \$100 gear stipend, plus surplus produce; raises based on work ethic after 6 weeks. Position runs April-October, 20-30 hours/week. Field Crew will assist with all aspects on the farm: seeding, transplanting, weeding, harvesting, row-covering, trellising, irrigating, animal chores and more! Possible Full-Time employment for experienced applicants with some hours split between an organic apple farm. www.squashingtonfarm.com/employment

FORAGES/GRAINS

2021 HYBRID RYE

800 bushels of organic 2021 hybrid rye. \$11.00 bushel. Grain is located in the 61279 area code. Contact Tracy at 309-235-5598

ORGANIC WHEAT STRAW

Large squares of organic wheat straw bales. Bales are 3x3x6' and the average weight is 400 lbs.

Asking price \$50. Davenport, IL area. Call 309-235-5598.

ORGANIC BALEAGE & DRY HAY

I have 4x5 rounds and 3x6 squares of baleage and dry hay from 2021 1st and 4th cuttings. Alfalfa/clover/timothy mix. High quality hay 150-180 RFQ. Prices are \$65 for rounds and \$50 for squares. Call 608-792-2952. West central WI.

ORGANIC BALEAGE & DRY HAY

Certified organic baleage and dry hay. Available as big rounds and small squares. La Farge, WI. Call 608-479-1222.

ORGANIC HAY

4x5 round bales - dry alfalfa (1st & 2nd cutting), dry clover (1st), dry alfalfa/clover/grass (1st) 4x4 round bales - alfalfa/clover/grass haylage (2nd) 4'x4' round bales - clover haylage (1st) 3'x3'x5.5' bales - dry alfalfa (3rd & 4th). Certified Organic, \$1.45/RFQ (tests available), located Pleasant Hill, OH. We can load your trailer. Call Adam 937-570-1053 or email innisfreeonthestillwater@gmail.com

ORGANIC OATS

1500 bu. organic oats, with a few wheat seeds. Located in Central MN. Call 320-557-7336.

ORGANIC SHELL CORN & BARLEY STRAW

Organic shell corn. \$9.50 bu. Large (4x5.5') rounds of barley straw- \$100 ton. Pickup only. Reedsville, WI. 920-905-3075

MOSA CERTIFIED ORGANIC BALEAGE

1st, 2nd, 3rd and 4th Crops. Individually wrapped and forage tested. Loading and delivery available from Westby. 608-634-3860.

ORGANIC CORN SILAGE BALES

Certified organic corn silage bales. \$125/bale. Average bale weight 1,850 lbs. Crude protein (9.1%). NDFD30 (45%). DM (41%). TDN (70%). Call (920)216-2825. Wonewoc, WI.

CERTIFIED ORGANIC HAY

Alfalfa Grass Mix and Wheat/Oats Hay. First cutting through 4th cutting. 4 ft by 5 ft round bales. Dry or wet wrap or small squares. Analysis available. Deliv-

ery available. Call or text 260-414-2897 or 260-409-0486. New Haven, Indiana.

ORGANIC ALFALFA/GRASS HAY FOR SALE

SECOND CROP 2021: 92 wet plastic individually wrapped 4x5 round baleage. \$200-213/ton CP 17.4-20.9; RFQ 155.5-184.5; TDN 65.7-66.9; THIRD CROP 2021: 70 (tarpred) dry 4x5 net wrapped round bales; \$258-305/ton CP 16.9-17.8; RFQ 201.8-217.4; TDN 69.1-69.2; FIRST CROP 2020: 75 pre-cut and wet plastic individually wrapped 4x5 round baleage; \$225-258/ton CP 18.4-20.3; RFQ 188.1-212.2; TDN 72.6-69.6; Baling on New Holland 460 baler. Contact Lorna at 715-207-9745 cell or at belties@caldwellfarms.com, in Milladore, WI.

ORGANIC ALFALFA/ORCHARD GRASS - RFV 103-106

Certified Organic 2nd cut Alfalfa/Orchard Grass 3x4x8 bales RFV 106, Protein 21.1 located in Northwest Missouri \$220/Ton also have 1st cutting available \$185/Ton RFV 103 Protein 18.3 call 660-654-3175.

ALFALFA & ALFALFA/GRASS HAY

First, second, and third cutting alfalfa and alfalfa/grass mix hay. They're 3x4x7 big square bales put up dry and stored on pallets. I also have some large round oat hay baled in September with the oats in them. Located in SW Iowa. Call 515-669-8044.

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.

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