



the ORGANIC Cultivator

VOL. 21 ISSUE 2 SUMMER 2023

Understanding the Benefits of Increased Enforcement

by Kristen Adams, Certification Services Director

We are all feeling the weight of increased organic enforcement and new regulations. The recent Origin of Livestock and following Strengthening Organic Enforcement rules impact the entire organic supply chain and regulatory system - producers, buyers, sellers, importers, brand owners and certification agencies like MOSA. If you have already completed your 2023 Annual Inspection you most likely experienced a longer inspection with more detailed questions and a deeper review of your records. In order to accept the changes that increase enforcement brings we need to understand the root of the problem.



According to the [Organic Trade Association](#), total organic sales - including organic non-food products - were a record \$67.6 billion in 2022. This growth reflects consumer's commitment to supporting organic production systems, but as demand grows, so does the complexity of the system.

INSIDE THIS ISSUE

UNDERSTANDING THE BENEFITS OF INCREASED ENFORCEMENT	1
FROM THE DIRECTOR	1
ORGANIC INDUSTRY NEWS	2
SIGN UP TO BE A MENTOR OR MENTEE!	3
CERTIFICATION POLICY UPDATE	4
GET HELP WITH CERTIFICATION COSTS	5
CLASSIFIEDS	6



FROM THE DIRECTOR

Cori Skolaski, Executive Director

I hope you're having a fantastic summer, soaking up all the beauty, long days, and warm weather this season has to offer. As we move through the seasons, the work of MOSA reflects that of our clients. We've received your organic system plans and are planning, scheduling, or completing your annual inspection.

We frequently receive questions about inspection billing. When you send us your annual update and submit your payment, the payment includes the inspection base fee of \$300 or \$400, depending on your scope(s). After the inspection, your inspector submits the report with the actual cost of the inspection, which is based on their time. If that exceeds the base fee, we will issue you a bill for the dif-

see DIRECTOR on page 7

see UNDERSTANDING on page 2

The Executive Summary of the Strengthening Organic Enforcement (SOE) rule reminds us of changes that have occurred since the original organic regulations were published in 2000. At that point in time, supply chains were typically shorter and less complex. Here at MOSA we see more organic products handled by brokers, cattle traders and importers who, before the Strengthening Organic Enforcement amendments to the National Organic Standards, were not part of this regulated system. These gaps in oversight increase the potential for fraud. Fraud devalues the hard work that you do to maintain organic integrity.

Increased enforcement of the National Organic Program through MOSA's oversight brings several benefits:

1. **Consumer Confidence:** Strong enforcement of the NOP enhances consumer confidence in organic products. Consumers trust that the organic label accurately represents the production methods used, including avoiding synthetic pesticides, genetically modified organisms (GMOs), and other prohibited substances. Increased enforcement helps prevent fraud and mislabeling, ensuring that consumers get what they expect when purchasing organic products.
2. **Maintaining Organic Standards:** Rigorous enforcement of the NOP safeguards the integrity and consistency of organic standards. It prevents unscrupulous producers from exploiting loopholes or engaging in deceptive practices that undermine the organic label's meaning. This ensures a level playing field for all organic farmers and businesses, preserving the integrity of the organic industry.
3. **Fair Competition for Organic Farmers:** Strong enforcement of the NOP prevents fraud and misrepresentation by unscrupulous producers who may undercut the prices of genuinely organic farmers. By ensuring that organic products meet the required standards, enforcement helps maintain fair competition in the market and supports the livelihoods of organic farmers.
4. **Protecting Public Health and the Environment:** Organic agriculture aims to minimize negative impacts on the environment and human health by promoting sustainable practices. Increased enforcement of the NOP helps prevent the use of synthetic pesticides, artificial fertilizers, and other potentially harmful chemicals, reducing pesticide residues in food, protecting farmworkers, and minimizing environmental contamination.
5. **International Trade and Harmonization:** Increased enforcement of the NOP improves the credibility of U.S. organic products in the international market. It encourages trade partners to recognize and accept U.S. organic standards, facilitating exports and promoting harmonization of organic regulations globally. This benefits organic producers seeking to expand their markets abroad.
6. **Innovation and Research:** Enforcement of the NOP encourages innovation in organic farming practices. By supporting research and development of organic methods, increased enforcement contributes to the advancement of sustainable agricultural techniques. This can lead to improved organic farming practices, increased productivity, and the development of new organic products.

MOSA's staff includes current and former farmers, food and agriculture professionals, organic consumers, and lifelong advocates for a healthy agricultural system. We understand the challenges many of you face because of climate change, inflation, changing markets, and increased oversight. We remain committed to preventing fraud that erodes your market, and we continue our commitment to upholding organic integrity through practical oversight of the National Organic Standards. ■

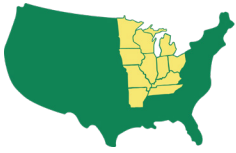
Organic Industry News

Organic Market Development Grant funding available now

After much anticipation, the USDA officially launched the \$75M [Organic Market Development Grant \(OMDG\) Program](#). Organic stakeholders must [apply by August 8, 2023](#). OMDG offers 24-month Simplified Equipment-Only funding between \$10,000 and \$100,000 and 3-year Market Development and Processing Capacity Expansion with funding ranging between \$100,000 and \$3,000,000. Cost sharing is 50% or 25% for historically underserved farmers, ranchers, and applicable small businesses.

Organic Dairy Marketing Assistance Program funding available now

[USDA officially announced \\$104 million](#) in marketing assistance for cow, goat, and sheep dairies under the new [Organic Dairy Marketing Assistance Program](#) (ODMAP). The Farm Service Agency (FSA) will facilitate this historic infusion of financial relief for organic dairy operations to offset 2023 marketing costs. Operations can apply for funding from May 24 - July 24, 2023, through FSA at your local [USDA Service Center](#). Funding will be disbursed on a rolling basis as applications are received.



MIDWEST

TRANSITION TO ORGANIC
PARTNERSHIP PROGRAM

United States Department of Agriculture
Agricultural Marketing Service
National Organic Program
Transition to Organic Partnership Program



Sign up today to be a Mentor or Mentee!

The Transition to Organic Partnership Program (TOPP) actively seeks experienced and knowledgeable certified organic producers who are passionate about organic production and interested in sharing their expertise with others. And, we seek producers who are curious about organic methods (or are already practicing organic methods) and are considering transitioning their operation to certified organic production.

Mentors will have the opportunity to guide and support producers who are transitioning to organic, providing valuable insights, practical advice, and industry best practices. As a mentor, you will play a crucial role in supporting new, organic producers and will contribute to expanding organic agriculture throughout our region.

Best efforts will be made to pair mentors and mentees who share similar production models (including scale, region, and crops); mentors will be expected to have regular meetings and check-ins with the mentee; and the mentor will be willing to candidly share their expertise in organic production to support the mentee's growth and success. This is a paid mentorship opportunity; including paid training, mentorship time, and travel time. Producers representing all scopes of organic certification are encouraged to apply! Participation benefits include:

- \$3,000 stipend for a mentorship year (additional stipend for mentors with more than one mentee)
- Paid professional development on topics such as professional and interpersonal skills, organic regulations, and organic production practices
- Teaching and facilitation skills
- Participate in growing the network of organic producers

We also seek producers who are interested in transitioning their operation to organic production. Apply now to be matched with a mentor who will support and guide you through the transition process. Your mentor will share their experience and knowledge; they will provide advice for best practices; they may connect you with other organic industry people; and they may assist with writing your organic system plan. Owners, managers, and operation employees are encouraged to apply as mentees, you just need to be intending to apply for organic certification.

Express your interest in becoming a mentor or mentee on MOSA's newly launched [Transition to Organic Partnership](#) webpage! In addition to expressing interest, learn more about the program, submit a request for more information, and learn about our core partner organizations.

The Midwest TOPP Regional Center and its partner organizations will connect farmers transitioning to organic with local, experienced organic mentors; provide farmer training and education; provide education and technical assistance on agronomy, organic certification, extension, conservation planning, organic regulations, certification cost share, business development, and marketing; build networks and strengthen the organic community; develop and expand access to technical assistance and training; and support workforce training and development. Our coalition of partners serves producers in Arkansas, Kentucky, Illinois, Indiana, Iowa, Michigan, Minnesota, Missouri, Ohio, Tennessee, and Wisconsin.



CERTIFICATION POLICY UPDATE

by Jackie DeMinter, Certification Policy Manager

Reminder: Variance options for drought conditions

Drought conditions in many of our certification areas have concerned farmers contacting us to see what options they may have to maintain compliance for ruminant livestock. Standards require that ruminants receive at a minimum 30% dry matter intake from grazed pasture. A temporary variance may be granted by the National Organic Program for operations unable to meet this requirement. Temporary variances are addressed in National Organic Standards section 205.290 and National Organic Program Handbook Instruction 2601 provides more detail regarding temporary variances. That document is found here: <https://www.ams.usda.gov/sites/default/files/media/2606.pdf>

Variances may only be granted for the production and handling requirements at §§ 205.203 - 205.207, 205.236 - 205.240, and 205.270 - 205.272, and must be granted during the season, not after the season has ended. Reasons for requesting a variance may include natural disasters, damage caused by extreme weather or other business interruption, or research practices. A temporary variance may not be granted for any practice, material or procedure prohibited under §205.105, for feeding nonorganic feed to organic livestock, or for any regulation not included in the sections listed above. **Similarly, variances are possible under the OPT Grass-Fed program.** Contact MOSA for more information regarding variances.

National Organic Program: Strengthening Organic Enforcement

On January 19, 2023 the USDA National Organic Program (NOP) published the Strengthening Organic Enforcement (SOE) final rule. The rule was effective March 20, 2023 and all affected entities must be in compliance by March 19, 2024. More information about the new regulation can be found on the MOSA website here: <https://mosaorganic.org/news-commentary/strengthening-organic-enforcement-soe-client-summary>

All affected parties - the NOP, certifiers, and certified operations - are actively making changes to implement the new regulations. At MOSA, we have updated our Organic System Plans, including introduction of the new Fraud Prevention Plan, launched our Non-Processing Handler Organic System Plan, streamlined certification processes, and are updating our internal processes and policies to align with the new and revised regulations. We are gearing up to begin generating and maintaining certificates and more robust operation information in the NOP's INTEGRITY database: <https://organic.ams.usda.gov/integrity/>. We will continue to work toward full compliance by March 19, 2024. Continue to watch for MOSA communication about your operation's compliance.

As another important step toward full implementation, the National Organic Program launched the Organic INTEGRITY Database Trade Partner Module. Trade partners and their certifiers are required to be included in the INTEGRITY database so as to further implement Import Certificate requirements. The Program plans a fall release of the Import Certificate Module.

Origin of Livestock: Information Collection Notice

The Origin of Livestock (OOL) final rule for organic dairy was effective June 6th, 2022 and required all operations to be in full compliance by April 5th, 2023. One of the provisions of this new regulation prohibits organic dairies from sourcing any animals that have been transitioned from nonorganic to organic status. Once a dairy is certified organic, new animals must be managed as organic from the last third of gestation. Variances from this part of the regulation may be requested by small businesses for the following specific scenarios.

- The certified operation selling the transitioned animals is part of a bankruptcy proceeding or a forced sale (§205.236(d)(1)(i)); or
- The certified operation has become insolvent, must liquidate its animals, and as a result has initiated a formal process to cease its operations (§205.236(d)(1)(ii)); or
- The certified operation wishes to conduct an intergenerational transfer of transitioned animals to an immediate family member §205.236(d)(1)(iii)).

The National Organic Program is seeking public comment on the burdens, costs, and other effects of the information collection required by the added process under which operations may request a variance, or exception, from the livestock sourcing requirements. Comments were due June 26, 2023. More detailed information about the Origin of Livestock: Information Collection Notice can be found here: <https://www.federalregister.gov/documents/2023/04/26/2023-06885/origin-of-livestock-new-information-collection>

MOSA has not received any requests to purchase transitioned animals under the new variance options.

Get Help With Organic Certification Costs

[Organic Certification Cost Share Program \(OCCSP\)](#)

The USDA/FSA has announced the opening of the [Organic Certification Cost Share Program \(OCCSP\)](#) for the 2023 Fiscal Year. The long-standing OCCSP provides financial assistance to certified organic operations.

OCCSP provides a rebate of 75% up to \$750.00 to certified operations for certification costs paid for each category or “scope” of certification (scopes are crop, livestock, wild crop, handling).

How to apply:

Apply through your county FSA office - [FSA County Office Locator](#). Some states may also offer OCCSP. Typically state programs open later in the season, and the application process and deadlines vary. States most recently offering Organic Certification Cost Share have included California, New Jersey, New York, North Carolina, Minnesota, Missouri, South Dakota, North Dakota, Ohio, Pennsylvania, and Wisconsin. To find out whether your state will be participating in this year’s Cost Share, contact your state department of agriculture or check the [USDA/FSA Cost Share Website](#).

USDA/FSA Cost Share Application Deadline:

OCCSP: October 31, 2023

State application deadlines vary and can be as early as September 30.

Rebates are issued first-come, first-serve.

Application Form:

[OCCSP](#)

Additional Forms if needed:

[Customer Data Worksheet](#)

[Payment Enrollment Form](#)

Include with your application a copy of your organic certificate and copy of invoice(s) paid between 10/1/2022 and 9/30/2023. Invoices must show date paid and paid in full or \$0.00 balance.

You may obtain copies of your paid invoices by logging directly on to your MyMOSA confidential account and following the link [Paid Invoices](#). You may also contact MOSA directly 1-844-637-2526 mosa@mosaorganic.org for copies of your paid invoices.

How does MOSA help? MOSA provides payment documentation and verifies organic certification status. We’re happy to answer your questions about cost share. We work cooperatively with the FSA and state offices. **MOSA does not complete, accept, or process cost share applications**

Questions? Contact your local FSA office, your state agricultural department, or MOSA 844-637-2526

Helpful Links:

[USDA/FSA Cost Share Website](#)

[OCCSP Fact Sheet](#)

[FSA County Office Locator](#)

[MOSA Website Cost Share Information](#)

[MOSA paid invoices](#)

CLASSIFIEDS

LIVESTOCK

HY-LINE BROWN PULLETS

3,600 pullets, 22 weeks old - just started laying. Delivery available for large amounts. Meadow Creek Farm & Market, 440-904-6846. Middlefield, OH.

35 DAIRY COWS

Holstein Cross. All stages of lactation. Contact Brad: 815-541-4540. Located in Northwest Illinois near Wisconsin border.

ORGANIC DAIRY COWS

Herd dispersal. Around 115 cows organic slaughter eligible, and around 15 cows organic but not eligible for organic slaughter. Cows have been selected for low input/grass-fed. Holstein, Jersey/Holstein Cross, and Fleck-vey/Holstein cross. All stages of lactation. Available late summer. OEFFA certified. Asking \$1500 each o.b.o. Contact Jay, phone: 616 617 8990, or write 14238 60th Ave Coopersville MI 49404.

14 BRED ORGANIC HOLSTEIN HEIFERS

Bred between 2 and 8 months. One very close. Located in West-by WI. Please call Mike at 608-632-0345.

MEAT PROCESSING AND MEAT SLAUGHTER

Integrity Meats does it all, from slaughter, to cutting, and packaging. Will cure and smoke, vacuum seal, etc. Call Sandy 608-572-4303. USDA Inspected. Integrity Meats, N3825 County Road 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

15332 State Highway 27
Cadott, WI 54727
Phone: 715.289.3000
crescentqualitymeats.com

LAND/FARMS IRRIGATED FARM IN CENTRAL MN

350 acres of land with 210 irrigated with center pivot. Farm house and many outbuildings. Additional 80 acres of irrigated land to rent. Reason for selling: Retiring. Call 320-63-4156.

LOOKING FOR ORGANIC VEGETABLE FARMERS!

Kings Hill Farm in Mineral Point, WI is looking for new farmers to take over our robust operation: farm, buildings, associated infrastructure occupying 40 acres, plus a 115 member CSA. For further information, see www.kingshillfarm.com, or contact Paul Goodman at 312-310-0313.

EQUIPMENT ROW CULTIVATOR

Multivator 4 row 30" tiller with hilling attachments, VGC; also 4 row cultivator Artsway Danish Tine, 5 tines per gang GC. Located in Apple Creek, OH. Call: 330-464-1782.

FRONT MOUNT CULTIVATOR

6 row 30" came off a John Deere 4020. Complete unit - hoses, cylinders, brackets, rolling shields, gauge wheels, and three shank gangs are included. Located in Bangor WI. \$3,750 OBO. Call Dan at 608-792-2952.

FARMALL H

\$1200.00 Good to fair condition. Runs and drives good. Cross Plains WI. Call 608-695-9372 or 608-695-9394.

WEED BURNER AND TINE WEEDER

4 row LP weed burner. 4 row tine weeder, 12' pull type. Brodhead

WI. Call Ervin 608-426-1726.

ROLLER CRIMPERS & HORSE DRIVEN IMPLEMENTS

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. <https://rollercrimpers.com/>

EMPLOYMENT POSITIONS AVAILABLE AT HARMONY VALLEY FARM, VIROQUA WI

Office Assistant & Packing Shed Support

See full job descriptions at www.harmonyvalleyfarm.com

FORAGES/GRAIN GRAINS AND HAY

Certified organic yellow corn, alfalfa/grass hay, oat hay; specify if you want square or round bales. Contact 641-751-8382, Toledo Iowa.

LOOKING FOR ORGANIC GRASS HAY

I need 24 tons of good organic or transitional grass hay for my beef cows. Tom Fisher 217-695-6770, Coatsburg IL.

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.

National Organic Program National List Updates

The 2023-2024 Sunset Review Notice renewing one substance until 2027, 42 substances until 2028 and 33 substances until 2029 can be found in this Federal Register Notice published 4/14/2023 and applicable 5/29/2023: <https://www.federalregister.gov/documents/2023/04/14/2023-07886/national-organic-program-2023-and-2024-sunset-review-and-substance-renewals>

As a reminder, the NOSB is required to review every substance on the National List every five years to confirm that it continues to meet all criteria required to remain on the list. This review is called "sunset review." Sunset materials are discussed at National Organic Standards Board meetings twice a year. The National Organic Standards Board Fall Meeting 2023 will take place on 10/24 - 10/26 in Providence, Rhode Island and will continue to be webcast live. Written public comments are due 9/28 and the verbal comment webinars will be held 10/17 & 19. More information can be found on the NOSB Meetings page: <https://www.ams.usda.gov/event/national-organic-standards-board-nosb-meeting-providence-ri>. ■



cont.DIRECTOR pg. 1

ference. A good way to keep your inspection expense down is to be prepared; have all your records, receipts, seed tags, and any other required or requested information organized and available before your inspector arrives.

MOSA is required by the NOP to perform unannounced inspections on 5% of our clients annually. Unless a noncompliance is discovered, you are not billed for this inspection. If you are selected for an unannounced inspection, don't panic. This doesn't necessarily mean that we are responding to a complaint (although sometimes we may be - this is one of the tools we use to investigate), and we are not hoping to "catch you." The inspector will give you a call up to four hours in advance to let you know they are on the way.

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. ■

MOSA

CERTIFIED ORGANIC

122 W. Jefferson Street
P.O. Box 821
Viroqua, WI 54665
(844) 637-2526

NON-PROFIT
ORGANIZATION
U.S. POSTAGE

PAID
LGI

— the — ORGANIC Cultivator

VOL. 21 ISSUE 2 SUMMER 2023

MOSA BOARD OF DIRECTORS

Laura McBride, *President*
seejattan@gmail.com

Jamie Lamonde, *Vice President*
jamie@kindshipgroup.com

Altfred Krusenbaum, *Treasurer*
krusen@krusengrassconsulting.com

Jim Wedeberg, *Member*
jim.wedeberg@organicvalley.coop

Megan Grinde, *Member*
Megan.Grinde@organicvalley.coop

Matt Hartz, *Member*
matt.hartz@pfc.coop

Ryan Matthews, *Member*
rmatthewws@gmail.com

Visit us at mosaorganic.org • Contact us at mosa@mosaorganic.org
Visit us on Facebook: facebook.com/MOSAOrganicCertification
Joe Pedretti, Editor • (844) 637-2526 • jpedretti@mosaorganic.org