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the ORGANIC Cultivator

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Fire against the glaciers: checking our temperature in Seattle

Stephen Walker, Operations Manager

In late April, Jackie DeMinter and I represented MOSA at the Spring National Organic Standards Board (NOSB) meeting, in Seattle, WA. We appreciated the chance to catch up with many organic community colleagues, bring some practical and friendly MOSA perspective to the discussion mix, and check the temperature of our National Organic Program and wider organic community. The NOSB has a couple of public meetings each year. They're a great exercise in democracy and an important confluence of good minds, hearts, and hands-on regulatory work. They also mark the passage of time. This was the 55th NOSB



FROM THE DIRECTOR

Cori Skolaski, Executive Director

I love this time of year - the lengthening days, planting, growing, greening, blooming... it makes for a busy and productive time! Here at MOSA the certification department is working on initial reviews on organic system plan (OSP) updates; the next step is the annual inspection. After the inspection, a certification specialist reviews your plan and makes a certification decision.

Inspection Notes:

- The inspection can only be done when an authorized,



NOSB Chair Harriet Behar gives opening remarks as NOP Deputy Administrator Jennifer Tucker looks on

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MOSA's Certification Policy Manager Jackie DeMinter testifies before the NOSB

meeting, going back to the 1990's. I've participated in most of these over the last 15 years or so. While this meeting addressed some tough issues and was not without controversy, I appreciated that there seemed to be fewer fireworks - more respect - than some previous meetings.

We talked a lot about how our Program is working, and heard frustration over inconsistent regulations' affect on struggling farms, the slow pace of improvements, and inactivity on standards development. But, we made some regulatory progress, and heard clarification on NOP enforcement.

For many years, we've struggled with similar themes around the slow pace of regulatory change. The particular issues may vary, but the concerns about catching up with our work have been a constant. At another NOSB meeting in San Antonio (2014), the NOP update noted progress toward aquaculture, origin of livestock, and pet food standards. In reaction, Jim Pierce, then with Oregon Tilth, testified about the glacial pace of change. He said the standards were "glacially progressing through the python." Jim is always good for metaphor, or a mixed metaphor. It's not lost on me that we've still not seen standards come about for those three issues from five years ago.

I arrived in Seattle a day early, to attend the National Organic Coalition's pre-NOSB meeting, where many organic leaders discussed various organic policy concerns. Here and over the next several days, we heard some common community concerns regarding fraud prevention, livestock standards (particularly, need for USDA action on Origin of Livestock rulemaking), and consistency of enforcement. We also heard some new thought-provoking ideas on how we might change some

governmental structure around making and approving regulations, to gain efficiency, to better be able to respond to innovation, and to maintain better control over organic community intentions. (One idea - from Miles McEvoy, former head of NOP - was to consider a separate standards setting authority, as is done in Canada. Another - from Laura Batcha, Organic Trade Association - proposed redefining how the Office of Management and Budget determines potential financial impact of regulations, but may not consider the negative impacts of maintaining the status quo.) We also heard more concerns about requirements for hydroponic and container production. This uncertainty continues to fester.

In her opening remarks, NOSB Chair Harriet Behar provided some measured criticism around our state of organic. She noted challenges with fraud, loopholes, enforcement of pasture requirements, the Origin of Livestock rule, poultry outdoor access, and lack of consistency. She said a fear of having regulatory decisions legally challenged has hampered our regulatory process, and, she pointed to a number of NOSB proposals (representing a lot of work and public input) that have not been taken up by the NOP. She said we need a better NOP system to address regulations sooner, not later. But, she noted that our community is tenacious. We want strict regulations. NOP Deputy Administrator Dr. Jennifer Tucker listened intently, and initiated a round of applause after Behar's remarks concluded.

Glyphosate prohibited. Boundary guidance needed.

There was some fire ahead of the meeting. It was alleged that organic operations were treating their land with glyphosate just ahead of putting growing containers on that land (with a plastic barrier). Dr. Tucker opened her report on NOP work by affirming, repeatedly, that "glyphosate use is not allowed in organic systems." Organic production requires at least a three-year transition period from conventional agriculture to a certified organic harvest. However, mis-stepping into controversy, Tucker had told [Civil Eats](#), "The three-year transition rule applies to a soil-based system. A greenhouse does not need to go through the three-year transition period." This raised concerns ahead of the meeting and across the globe.

Tucker also noted there's no indication that prohibited substance use is happening on container-based farms. NOP investigated one of the operations reported to have used glyphosate, and its certifier, and found no violations. She'd said, "I'm confident

glyphosate was not applied to the soil below this system.” The Civil Eats article also quoted Lee Frankel, from the Coalition for Sustainable Organics, the primary organization representing hydroponic farms. He affirmed, “I am not aware of that ever occurring.” Tucker had added that different growing environments can lead to different kinds of production systems—but the same rules around organic certification apply everywhere. “Certifiers look at site-specific circumstances, what’s the platform or organic system at hand, and apply the regulations.”

In Seattle, Dr. Tucker claimed her prior statements were taken out of context; they were not representative of NOP policy. She expressed some regret for commenting on a hypothetical scenario. But, public commenters and concerned NOSB members repeatedly asked for confirmation that no operation seeking organic certification can use prohibited materials, including glyphosate, during their required three-year transition period. Treading carefully, Tucker continued to refuse to comment on hypotheticals, and repeated that “glyphosate is not allowed in organic production.” She reminded that NOP needs specific complaints before they can evaluate practices against the regulations.

In Seattle, we discussed boundaries around this issue with Accredited Certifiers Association colleagues. There was general agreement that the land requirements at Standards section 205.202 require a three year transition after any application of a prohibited substance to any farm parcel. But, we also recognized a need for more clarity around the land requirements boundaries, split production, and container production in general.

NOP clarification received June 3rd stated in part: *Certifiers are to assess land use histories for container system sites, just as they would for an in-ground soil-based system. If a prohibited substance was applied to the land at the farm or site within the three-year period before the first organic harvest, then the harvested crops shall not be sold, labeled, or represented as “organic” until the three-year period has passed; and, Certifiers must evaluate the compliance of the overall system, including maintaining or improving natural resources, supporting nutrient cycling, promoting ecological balance, and conserving biodiversity. This memo applies to all new container systems that have not yet been certified under the organic program. It is not retroactive to already certified operations and sites. All currently certified container system operations retain their certification as long as they maintain compliance with the regulations.*

Initial stakeholder reactions included appreciation for the clarification, disappointment in the lack of retroactivity, and uncertainty as to whether production buildings are to be viewed differently than production in or on a field.

NOP Update

Dr. Tucker’s full [NOP update](#) included a number of Program successes and updates on rulemaking. Most notably, we’re waiting with anticipation for a forthcoming proposed rule on Strengthening Organic Enforcement. That’s expected this fall. This will likely require certification for some operations that are currently exempt or excluded. It will also address: import certificates, nonretail container labeling, unannounced inspections, certificates and certificate expirations, training and qualifications, international oversight, noncompliance procedures and due process, group certifications, and supply chain traceability and fraud prevention. We’ll want plenty of time to offer comments. We envision that the enforcement rule could be a last, best chance to set the course for making our regulatory work sustainably sound. We’re cautious that new requirements do not make a more burdensome system in a [world that needs organic to be more accessible](#).

To successfully address 21st century challenges, technological innovation is essential. In March, the NOP launched a new database to improve tracking compliance issues, show compliance patterns, and help support enforcement and investigations.

For improved import oversight, NOP is working with the Office of Inspector General to conduct risk-based oversight of organic supply chains, through farm-level yield analysis, supply chain research, fumigation investigations at ports (with the Animal and Plant Health Inspection Service), ship-specific surveillance, certifier investigations, and country-commodity studies. As a result of new directives on unannounced inspections and product testing, 180 (60%) operations in the Black Sea Region have lost their organic certification, and remaining operations are under continued scrutiny. Also, some fumigated organic products were re-labeled, not sold as organic. And, additional noncompliances and proposed suspensions for certifiers and farms continue to ensure organic import integrity.

The NOP has also been conducting unannounced inspections of organic dairy operations nationwide to verify dairy standards compliance. This compli-

CHANGES TO THE NATIONAL LIST IN THE ORGANIC STANDARDS REGARDING METHIONINE FOR POULTRY

Methionine is an essential amino acid, a building block of protein, that is not produced by animals and is limited in the grain-based diets typically fed to commercial egg-laying or meat poultry. Since methionine is required for basic cell development, birds that are deficient in methionine do not convert feed efficiently, grow quickly, or produce as many eggs. Also, because methionine is a significant component of feathers, a methionine deficiency can result in poor feather growth and increased pecking in a flock.

There are three synthetic forms of methionine that are included in the National List of synthetic substances allowed for use in organic livestock production, though the amounts of synthetic methionine that can be fed are restricted (limited) according to the type of poultry: 2 pounds per ton of feed for laying chickens, 2.5 pounds for broiler chickens, and 3 pounds for turkeys and all other poultry. At the end of January, a significant change went into effect in the National List entry for methionine: these maximum rates can now be averaged per ton of feed over the life of the birds in the flock rather than being maximum amounts in each ration, as the restriction previously required. This change will allow poultry producers to feed more methionine at certain stages of a bird's life, such as during the critical early weeks of development, as long as the producers then feed a reduced amount of methionine during other stages, so that the average amount of synthetic methionine fed over the lifespan is not greater than the allowed average amounts.

This change means that poultry producers and MOSA can no longer simply view the methionine value on a ration label to determine if the producer is complying with the methionine restriction in the National List. For producers who decide to feed a variable rate of synthetic methionine, more information will need to be provided to MOSA so we can verify that the producer has a feeding plan that allows compliance with the new restriction.

For 2019, MOSA will ask all poultry producers during Initial Review—the desk audit MOSA performs of a client's application before it is sent to the annual inspector—if they intend to

feed a variable rate of synthetic methionine. Poultry producers will receive a “More Information Needed” letter during Initial Review which we hope will allow clients to quickly inform MOSA of their intention regarding providing methionine in their rations this year. Based on responses to these questions, there will likely be three groups of poultry producers regarding methionine: those who do not feed any synthetic methionine, those who do feed methionine but at a fixed rate, and those who feed methionine at a variable rate.

MOSA will also be asking our MOSA-certified feed manufacturers questions regarding methionine during the Initial Review process. We will need to know if they intend to change the methionine rates in their stock feed formulations and if they will be offering variable rate methionine ration plans to their customers who purchase custom feed blends. While the organic poultry producer is ultimately responsible for maintaining compliance with the new National List restriction, MOSA appreciates the vital role certified feed manufacturers play for their feed customers, so will be verifying that any variable rate rations they provide are part of a compliant overall plan.

For those poultry producers and feed manufacturers who do intend to feed or produce rations with a variable rate of methionine, MOSA will require during Initial Review that they provide a written plan—or complete a new form that MOSA has developed for their type of operation—that provides the details necessary for MOSA to determine compliance with the new restriction. These plans will be especially important regarding rations for poultry, such as laying hens, that may not have completed their lifespan during one annual organic certification cycle.

For the next step after Initial Review in the certification process, the on-site Inspection, MOSA will verify if poultry producers and feed manufacturers are following their stated plan regarding feeding or producing rations with synthetic methionine. For those clients feeding or producing rations with variable rates of methionine, the inspector will also verify that the client is maintaining the records necessary to show that

ance project is underway again this spring in the midwest. So far, all operations surveilled demonstrated at least 120 days of grazing and at least 30% dry matter intake. Some investigations are ongoing, and one operation received a fine. The dairy compliance inspections identified areas where additional training is needed for certifiers and operators. That will be addressed through the NOP's new Organic Integrity Learning Center.

The Organic Integrity Learning Center was launched a few weeks ago. It offers online training to support the professional development and continuing education of organic certifiers, inspectors, reviewers, and others working to protect organic integrity. We'll be incorporating this into our training program for MOSA staff.

And, the NOP staff is expanding, with a new Associate Deputy Administrator, a Trade Systems Director, a Quality Manager, and another Accreditation Manager. NOP also posted multiple Livestock Compliance Specialist positions, and several accreditation auditor positions which allow for remote work - a rarity within NOP.

NOSB meeting decisions and discussion

Ahead of the meeting, the Board reviewed nearly 900 written comments, including a handful from MOSA. Unfortunately, the comment period was again too short - just 22 days to digest and give feedback on nearly 70 documents and proposals. During some 14 hours set aside for public comment at the meeting, the Board asked a lot of questions and engaged in thoughtful dialogue. All our written comments are on our [website's news and commentary section](#). Jackie and I were among the 114 persons presenting verbal testimony.

The NOSB passed five new proposals. These are now referred to the USDA for approval and implementation. (Five petitions for allowance of new materials were rejected.)

- The Board passed a proposal to *strengthen NOP Guidance 5029 for the required use of organic seed*. This had been under discussion for several years. Noting minor areas where adjustments could be made, commenters still widely supported this proposal.
- We have an update to the guidance for making *excluded methods determinations*. Newly defined as excluded methods are transposons developed via use of in vitro nucleic acid techniques, and cisgenesis.
- And, several new materials are recommended for allowance. Commenters and NOSB members were generally supportive of allowing *oxalic acid* for varroa mite control in apiculture (honey bees). It's a less harmful alternative to formic acid, has a unique application for use in package bees, and is approved in other international organic standards. Commenters also widely supported the addition of *pullulan* as a non-agricultural substance for capsules for dietary supplements labeled as "made with organic..." And, though comments were split regarding the allowance of *collagen gel* for sausage casings (with some concern about the use of CAFO byproducts) NOSB members saw benefits toward growing the organic meat market, so collagen gel was approved.

The NOSB also reviewed a number of discussion documents, with the intent of bringing forward proposals at future meetings.

- Commenters supported embryo transfer as a needed tool in livestock production. *Embryo transfer* was determined to NOT be an excluded method.
- There was discussion of several options for addressing environmental impact of *marine materials harvested for use in crop inputs* (e.g. kelp/seaweed fertilizers and soil amendments). There's wide agreement that continued work is needed, but no consensus on which direction/option can adequately address the environmental concerns. This fall, an expert panel will address ecology, environmental considerations, regulatory certification and legal oversight of marine algae production and harvesting.
- Most comments opposed the pilot project described in the *genetic integrity transparency* of seed grown on organic land discussion document. Harriet Behar explained the intent was to give information to farmers about purity level of seeds so that they can protect themselves if they sell to sensitive markets. The NOSB does not want the seed testing burden to only impact organic farmers, and is looking for shared responsibility from others. Questions remain about how regulatory solutions might best address GMO contamination challenges within our industry.

CERTIFICATION POLICY UPDATE

by Jackie DeMinter, Certification Policy Manager

National Organic Program Updates

National List Final Rule

As a reminder, on December 27th, 2018 the National Organic Program (NOP) published a [final rule](#) amending the National List of Allowed and Prohibited Substances for crops, livestock and handling. The rule changes the use restrictions for 17 substances and adds 16 new substances. The rule also removes the parasiticide Ivermectin as an allowed parasiticide for use in organic livestock production and amends regulations to allow the emergency use of other parasiticides (fenbendazole and moxidectin) in fiber-bearing animals. The rule now lists the botanical pesticide rotenone as a prohibited substance in organic crop production.

The final rule was effective January 28, 2019, except for amendments concerning the following materials which will be implemented on December 27, 2019.

- Ivermectin (now prohibited)
- Flavors (organic flavors required when commercially available)
- Cellulose (only *powdered cellulose* as an anti-caking agent (non-chlorine bleached) and filtering aid. *Micro-crystalline cellulose is prohibited.*)
- Glycerin
 - Reclassified as agricultural requiring organic commercial availability searching for use of nonorganic glycerin.
 - Annotation updated to require verification that nonorganic glycerin was produced from an agricultural source and processed using biological or mechanical/physical methods.
- Carnauba wax (reclassified as agricultural)

MOSA's new Organic Search-Handlers form should be used to document your annual searches for reclassified materials.

Refer to our last newsletter for a detail of all changes. We have implemented all changes accordingly and will be requiring updates to your file information as applicable to your operation. Most notably, we've been working on verification tools for the new methionine rule, which is covered separately in this newsletter.

The change to the flavors annotation has also sparked questions among clients. Beginning December 27, 2019 manufacturers using nonsynthetic natural flavors will be required to verify that they have searched for equivalent organic flavors before being approved to use the nonsynthetic flavors. MOSA's Organic Search-Handlers form is preferred for documenting the search.

Additional National List Final Rule

On April 30, the NOP published a [final rule](#) to amend the National List of Allowed and Prohibited Substances for livestock and handling. This final rule impacts two materials.

- Elemental sulfur will be allowed for use in organic livestock production as a topical treatment to repel mites, fleas and ticks from livestock and their living spaces.
- Potassium acid tartrate will be reclassified from a nonagricultural substance to an agricultural substance, requiring handlers to use the organic form when it is commercially available. Potassium acid tartrate is currently listed as a nonorganic ingredient allowed in organic products.

This final rule is effective May 30, 2019.

National List Proposed Rule

On February 15, 2019, the NOP published a [proposed rule](#) to amend the National List of Allowed and Prohibited Substances for crops and handling. This proposed rule would allow:

- Elemental sulfur to be used as a slug or snail bait to reduce crop losses.

- Polyoxin D zinc salt to control fungal diseases when other organic fungicides have been found to be less effective.
- Magnesium chloride to be reclassified from a synthetic to a non-synthetic substance, requiring handlers to ensure that the product complies with the non-synthetic classification by obtaining details about the source of the magnesium chloride and its full manufacturing process.

Submitted comments will be considered for a final rule. Continue to watch our newsletter for updates to the National List.

Certification of Mushrooms

On February 14, 2019 the NOP issued a notice to certifying agents about the review of pre-inoculated mushroom log products for organic mushroom production.

The notice clarified that operations producing **ready-to-use spawn* are required to hold organic certification. Operations producing mushrooms have been notified that any previously approved nonorganic ready-to-use spawn products are no longer in compliance and products must be removed from organic production by September 1, 2019. (There was an error at the NOP that changed this date to August 1, but the correct date is September 1.) **All clients using any nonorganic ready-to-use spawn will need to provide updates to your Organic System Plan paperwork this season.** Mushrooms produced from nonorganic ready-to-use spawn can no longer be certified organic.

*The NOP is considering that *ready-to-use spawn* is a product that includes all components to produce organic mushrooms. Their notice clarified the pre-inoculated mushroom logs contain the spawn, growth medium and nutrients required to produce a mushroom crop upon watering and are not placed in new containers or growth medium at the certified operation.

Use of Paper Pots

MOSA is continuing to allow the use of paper pots we've approved in organic production while the National Organic Standards Board (NOSB) process is underway. We expect the NOSB to have a final recommendation on the acceptability of paper pots in organic production later this fall. We'll revisit our policy then and make any necessary updates. Continue to watch our newsletter for additional notifications.

Organic Livestock and Poultry Practices (OLPP) Rule Update. We've been talking about the OLPP rule for quite some time now with little movement, but that's changing beginning this season. Certifiers are taking action to revise policies to be in line with the soon to be published Best Practices document based on the OLPP rule. Certifiers have the goal to consistently follow the same interpretation of the standards. At MOSA we've updated our policies and will be communicating any clarifications applying to your operation during review and inspection this season and next.

What are the biggest clarifications we are making?

Alterations

- Beak trimming must be done prior to 10 days of age. Producers should keep receipts showing that the alteration was performed prior to 10 days.
- Tail docking in pigs is generally prohibited, unless there is a documented reason to dock individual animals.
- Needle teeth trimming is restricted and may not be routinely used and must be used only with documentation that alternative methods to prevent harm failed. No more than the top 1/3 of teeth should be trimmed.

Parasite Control. We will be ensuring your parasite and pest prevention plans are thoroughly documented in your Organic System Plan (OSP). If you use ivermectin, fenbendazole, or moxidectin, be prepared to update your OSP.

Poultry living conditions. (All metrics are assuming a pullet is approximately 3 lbs and a laying hen is approximately 4.5 pounds and a broiler is approximately 5 pounds)

- Bedding or litter material must be used on solid floor portions of housing. Dried manure, without bedding, is not considered adequate litter.

REDUCE YOUR ORGANIC CERTIFICATION COSTS

USDA/FSA is now accepting Organic Cost Share applications.

The USDA Organic Cost Share Program (OCCSP) has announced the FSA is accepting organic cost share applications. **Application deadline: October 31, 2019.**

Certified operations applying for organic cost share can expect 75% up to \$750 for each category or certification “scope.” There are four scopes: crop, livestock, wild crop, and handler. Examples: An organic operation certified in one scope – crop – that has paid \$1,000 in organic certification fees can expect \$750. A two-scope operation - crop and livestock - that has paid \$2,000 can expect \$1,500 (\$750 per scope).

Actively certified organic operations are eligible for organic cost share.

The program is available through the FSA and some states. State-run cost share programs typically open in June – July. Application deadlines and requirements vary with state-run programs. If you applied through your state program in 2018, you should be receiving an application from your state by July 2019. The list of participating states is not yet finalized. If you’ll be applying through your state and have not received an application by July 15, 2018, make sure to contact your state department of agriculture.

ORGANIC COST SHARE QUICK FACTS

Application Deadline

FSA October 31, 2019.
State deadlines vary.

Where / How to Apply

Contact your local FSA office or your state department of agriculture for an application.

To locate your FSA county office, use this link [FSA County Office Locator](#) or contact MOSA.

You can apply through either the FSA or your state program (if offered), but not both.

Is your operation eligible for organic cost share?

Organic certificates do not expire.
Organic certification cost share is available to certified organic operations.

If your operation is certified organic, it is eligible for organic cost share.

Eligible fees and costs

Fees related to equivalency agreement/arrangement requirements, travel/ per diem for inspectors, user fees, sales assessments, and postage.

Ineligible Costs: Equipment, materials, supplies, late fees, transitional certification inspections, and inspections necessary to address NOP regulatory violations.

Will the Organic Cost Share Program run out of funds?

Funded through the 2018 Farm Bill, the program is funded for 5 years. Each cost share year has an annual funding cap. Operations are encouraged to apply as soon as possible.

How does MOSA help? MOSA provides payment document and verifies organic certification status. We’re also happy to answer your questions or concerns about the application process. When you’re ready to apply to the FSA, contact MOSA and request your payment documentation. For the Wisconsin, Minnesota, Ohio, Pennsylvania, California, New York, and New Jersey state programs, MOSA provides payment documentation at the program’s request. For other states, contact MOSA for payment documentation. MOSA does not complete, accept, or process cost share applications.

Questions:

Contact your local FSA office, your state agricultural department, or Lexy McManaway, MOSA Cost Share Coordinator, 608-572-7276.

HELPFUL LINKS:

USDA – May 6, 2019 News Release

<https://www.fsa.usda.gov/news-room/news-releases/2019/usda-accepting-applications-to-help-cover-producers-costs-for-organic-certification>

USDA – FSA Cost Share website

<https://www.fsa.usda.gov/programs-and-services/>

FSA offices locator

<https://offices.sc.egov.usda.gov/locator/app>

MOSA website

<http://mosaorganic.org/education-resources/certification-cost-share>

- NOSB members repeatedly stated that the *assessing cleaning and sanitation materials used in organic crop, livestock and handling* discussion is NOT intended to remove sanitizers from allowance, but commenters still expressed concern, and noted sanitizers' essentiality for food safety. Discussion is intended to develop reference information so NOSB members can better evaluate new sanitizers.
- The NOSB received substantive comments on priorities for *oversight improvements to deter fraud*. Next steps may include hearing about enforcement experiences from California's State Organic Program, exploring ways to capture data from operations in countries for which we have recognition or equivalency agreements, and learning more about the fresh produce supply chain.
- A discussion document on *excluded methods vaccines* in organic livestock production presented three options. Comments were most supportive of allowing excluded methods vaccines as a class, or, allowing excluded methods vaccines only if non-GMO vaccines aren't commercially available. NOSB will continue to explore this option.
- And, commenters continued to stress the necessity of paper transplanting pots. The NOSB is looking at synthetic fibers in paper, and requested a Technical Report for more information. NOSB is also considering other allowed uses for paper, and aims to avoid creating inconsistencies.

What's next?

The Fall NOSB meeting will be in Pittsburgh, PA, in late October. Notable work agenda topics will include marine materials in crop production, embryo transfer in livestock, research priorities, petitions for paper pots, potassium hypochlorite, and fatty alcohols, and votes on 2021 sunset materials.

In the meantime, we certifiers will do our best to define boundaries, weighing regulations' letter and intent against various challenges on real organic operations. When we find something new, we seek counsel, consensus, or precedent from other certifiers and from the NOP. I appreciate NOP's sensible take on regulatory discretion and generally find that our National Organic Program is in good hands, but sometimes the system and current administration create handcuffs.

In my testimony before the NOSB, I noted that I used to be frustrated when we'd seek NOP guidance and hear "we don't have a policy on that." But, I noted how at a certifier training a few years ago, Dr. Tucker explained that when there's no specific published policy, then ACA's are empowered and expected to make reasoned - and ethical - certification decisions.

I continued, "*Certifiers are skilled navigators on a changing landscape. We tend standards, organic values, and forward thinking. I value certifiers' autonomy and ability to align, define boundaries, improve. For example, we're currently working with other certifiers on best practices for hydroponic/container production, requiring nutrient cycling, biological activity, biodiversity enhancement, and natural resources improvement. Organic choices in these systems must meaningfully serve our ailing planet. We need NOP and NOSB help to develop applicable regulations. This part of our house is still on fire. We need action. Let's get this back on NOSB work plans and consider requirements for the farm system, beyond the container.*

"Out here on the front lines defending organic integrity, we see a lot of good work, inspiring hope. But there's also despair and frustration. It's hard to maintain faith in organic as a solution to global crises. Some perspective: MOSA certifies 600-some dairy farms, averaging 64 cows per herd. Failure to move forward vetted, agreed-upon rules hurts our farm families, rural economies, and our Seal. Stagnation also disables the resolve needed to heal our planet. Let's move forth the Origin of Livestock final rule, this year.

Certifiers navigate the grey and draw boundaries every day. We're good, but today as our community is threatened at its core, we need clear guidance, and teeth."

It's as Harriet Behar stated in her opening remarks as NOSB Chair, "The NOSB and NOP have a responsibility to live up to the trust of the organic community... Without integrity, we are nothing." ■

knowledgeable representative of the operation is physically present and at a time when it is possible to observe all land and facilities.

- One of the things all inspectors will ask is, "Have you resolved any noncompliances or issues of concern since your last inspection?" For this reason, it's best for you to review your most recent certification determination letter(s) before the inspection so you can easily answer this question. For example: "I was required to install a setback fence in pasture A. Look, there it is!" If you struggle to answer questions about how previous issues were resolved, this will complicate your inspection.
- The same is true about any questions that may have been asked in the Initial Review letter sent to you before the inspection. If you received a letter that says, "Have Document B ready for your inspector to collect," you can be sure the inspector will ask you for it. This is true even if it's something they've never needed to collect in previous years.
- Understand that the inspector does not make decisions about who gets certified. The job of the inspector is to observe and report on the extent to which the operation matches (or does not match) the description given in the OSP.
- Many inspectors will start with a tour of the farm or facility. This is usually an inspector's favorite part of the inspection. If they notice that anything looks different than the OSP describes, you will be asked to explain the change. If there are deviations from the OSP, they'll ask whether they were intentional or accidental; permanent or temporary? Is there anything new that needs to be added to the OSP? Is there anything that is obsolete and needs to be removed from it? This is when the focus shifts to documentation.
- 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.
- Your current organic certificate does not expire unless you surrender or we suspend or revoke it; your 2018 organic certificate is valid until we issue your 2019 certificate. As long as we don't tell you otherwise, you are good to go.
- At any time, you can log into MyMOSA.org to review your organic system plans and other documents, see your inspection report, view or pay certification or inspection fees, and view and print your organic certificate. Almost half of our clients have gone paperless, and find it very convenient.

At the end of the day, many MOSA farmers and processors find their inspections to be enjoyable experiences, and inspectors feel the same way. Inspection is a challenge, but it doesn't have to be a chore! Set yourself up for success by preparing as much as possible and asking MOSA any questions you might have in advance. You can also find a more detailed description of our record-keeping requirements in MOSA's Program Manual.

Speaking of OSP's and MOSA's program manual, several weeks ago we sent both to you.

The Program Manual has been updated and it is your responsibility to make sure you review it. If you have any questions, feel free to contact us for clarification. Please also

carefully review your OSP; if you find anything incorrect, outdated, or missing, make changes to it and notify your inspector.

MOSA is pleased to offer Grass-fed Dairy and Meat certification. Working with the third party organization Organic Plus Trust (OPT) the Grass-fed standard was developed to instill consumer confidence regarding what is behind the label and builds on expanding awareness and valuation of the health, animal welfare, and conservation benefits of grass-fed dairy and meat production. If you are interested in Grass-fed certification visit our website or give us a call for more details.



Congratulations to Steve Walker, MOSA's Operations Manager, and MOSA Board Member Beth Unger, on their recent election to the IFOAM North American board of directors. This is the regional body of IFOAM members in Canada, the United States, and the English-speaking Caribbean. Its mission is to educate the public, provide a forum to exchange ideas, and engage in North American-specific activities to advance organic agriculture and its principles, in partnership with IFOAM-Organics International and the global organic community.

Congratulations to MOSA Certification Review Manager Feliciano Puig and her husband Dave on the recent birth of their daughter Alma Nayeli!

We're happy to welcome three new staff at MOSA! Sarah Forsythe, Kassie Brown, and Kelley Belina recently joined our staff as Certification Specialists.

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. ■

they are following the plan they provided to MOSA, and will perform an audit of these records to determine if the plan is being followed. Some producers may need to record information that they have previously not maintained so the inspector can use the feed records for the flock (such as receipts from the manufacturer) to determine average methionine-feeding rates per bird. Examples of this information include the average number of birds eating each ration and the dates each ration was fed.

Finally, MOSA will assess whether manufacturers and producers have complied with the new restriction, or are on track toward compliance, during the last step of the annual certification process, Final Review. Any clients who are providing methionine at a rate higher than the allowed average amounts, and do not appear to be following the plan they provided to MOSA, will be required to alter their feeding protocols to come into compliance with the National List restrictions.

The new language for the methionine entry in the National List will provide poultry producers and feed manufacturers greater flexibility in how they distribute synthetic methionine over the lifespan of the poultry in their operation. With this new flexibility, though, comes challenges for MOSA and our clients in verifying and documenting compliance with the new allowance. MOSA intends to educate clients regarding the rules change, assist them in developing recordkeeping tools to track their efforts to comply with the rule, and then determine if they are, in fact, maintaining compliance. We hope to partner with our clients to perform these tasks efficiently and smoothly over the course of this inspection season, and welcome questions and comments from clients affected by this new change regarding methionine. ■

FEATURED EVENTS

June 2019

SFA Tour of Kadelbach Organic Farms

June 30 | Free | 2 – 6 p.m. | Hutchinson, Minn.

Kadelbach Organic Farms is a 300-acre certified organic farm currently growing sweet corn, sweet peas, black beans and alfalfa/grass hay. Visit the fields and learn about each of these crops, and farmer Glen Kadelbach will show the equipment he uses. [Learn more.](#)

SFA Garlic Field Day

June 30 | Free | 2 – 5 p.m. | Wadena, Minn.

Anita Small and Phil Iverson of Garlicky Bohemian Farm grow about 6,000 bulbs per year and sell it primarily at a farmers market. At this field day they will talk about their trials on spring fertilization, seed dip treatment, planting dates and mulch removal. [Learn more.](#)

July 2019

Weeds & Cultivation for Lean Farm Production

July 1 | 9:30 a.m. – 4 p.m. | Free | Ada, Mich.

Weeds can be one of the biggest obstacles to high yields, profits and peace of mind on the farm. Learn ways to prevent, reduce and control the weeds on your farm. See the tricks and tools in action on a successful organic vegetable farm. [Learn more.](#)

Women Caring for the Land: Pape Family Pastures

July 8 | 4 – 8 p.m. | Peshtigo, Wis.

Wisconsin Farmers Union, in partnership with Pheasants Forever, is hosting this series of workshops. Husband and wife team Aaron and Erin Pape began Pape Family Pastures in 2016. With no farming experience, they were guided by the principles of soil health and Aldo Leopold's essay, "The Good Oak." They raise pastured beef, pigs, and chickens. [Learn more.](#)

Grow Row Crops for Distilling

July 10 | 1 – 4:30 p.m. | Onalaska, Wis.

In his second year of growing specialty rye and corn for La Crosse Distilling Company, Patrick McHugh will discuss his organic growing techniques, crop rotation and fertility management. A representative of LaCrosse Distilling Company will explain the types of grains needed by artisan distillers. [Learn more.](#)

Women Caring for the Land: North Wind Organic Farm

July 16 | 8:30 a.m. – 2 p.m. | Bayfield, Wis.

Wisconsin Farmers Union, in partnership with Pheasants Forever, is hosting this series of workshops. North Wind Organic emphasizes solar and wind energy in their organic production of fruits and vegetables. Child care will be available. [Learn more.](#)

Dairy Grazing Apprenticeship and SFA Grazing Field Day: Hendrickx Dairy

July 19 | 10:30 a.m. – 3 p.m. | Sebeka, Minn.

Learn how Mike and Alida Hendrickx have turned CRP land into profitable grazing land. RSVP: Hannah Molitor, SFA/DGA Coordinator, at 320.310.5252 or hannah@sfa-mn.org.

August 2019

Organic Row Crops in South Dakota

August 1 | 8:30 a.m. – 2 p.m. | Madison, S.D.

MOSES board member Charlie Johnson hosts a tour of his expansive organic farm, showcasing organic methods for growing corn and soybeans. This event is organized by Northern Plains Sustainable Agriculture Society (NPSAS). [Learn more.](#)

In Her Boots: Success Strategies from the Soil Sisters

August 2 | \$25 | Brodhead, Wis.

This special In Her Boots workshop will kick off the Soil Sisters' weekend, with a particular focus on women farmers running meat operations including a detailed, behind-the-scenes farm tour at Riemer Family Farm. [Learn more.](#)

Women Caring for the Land: Fenn's Folly

August 8 | 9 a.m. – 2 p.m. | Ferryville, Wis.

Wisconsin Farmers Union, in partnership with Pheasants Forever, is hosting this series of workshops. Amy Fenn is working to turn a depleted hayfield and unmanaged woods into a savanna/silvopasture. This is her third year of grazing, fencing, and building an off-grid home. [Learn more.](#)

Organic Agronomy Training Series (OATS)

August 14 & 15 | 85\$ | La Crosse, Wis.

A science-based education program for extension staff, agency personnel, consultants, educators, technical service providers and farmers to increase understanding of organic production systems and USDA-NOP regulatory compliance. While farmers are welcome, this event is geared towards organic educators and consultants. This series is generously supported by Pipeline Foods, Clif Bar and the Organic Trade Association's Organic Grains Council. [Learn more and register.](#)

Cultivating Farm Resilience for a Changing Climate

August 16 | 1 – 4:30 p.m. | Harlan, Iowa

MOSES is a co-sponsor for this Practical Farmers of Iowa field day that will touch on resilient farm planning, water quality, and cultivating community resilience. The Rosmanns will highlight how they work small grains into their field crop rotations, use cover crops for rotational grazing, and discuss their farrow-to-finish swine operation. [Learn more.](#)

Flame Weeding Workshop

August 19 | 9:30 a.m. – 5 p.m. | \$ | Ithaca, Neb.

This day-long workshop will present results from the seven years of research conducted by the team of Professors Stevan Knezevic and George Gogos. Learn how to do proper flaming to control over ten major Midwestern weeds in seven agronomic crops (field corn, sweet corn, popcorn, soybean, sorghum, sunflower and wheat). [Learn more and register.](#)

Add Unusual Fruits to Your Farm

August 21 | 10:30 a.m. – 3:30 p.m. | Winona, Minn.

MOSES Organic Farmers of the Year, Jim Riddle and Joyce Ford, showcase how they grow all things blue. Focus is on unusual fruits, overhead netting, native plants, and mechanical weed control for orchards. Lunch included. [Learn more.](#)

UW Arlington Organic Agriculture Research Field Day

August 29 | 10 a.m. – 3 p.m. | Arlington, Wis.

This field day will highlight organic research conducted at the University of Wisconsin, including optimizing equipment and production practices for organic no-till production, inter-seeding cover crops into corn, soybeans, and cereal grains, the impact of organic management on soil microbial communities, and weed management for organic hemp production. Lunch included. [Register.](#)

CLASSIFIEDS

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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 Hwy 73, Withee, WI 54498. 715-229-2500.

LANDS / FARMS

297 ACRE ORGANIC FARM

For Sale: 297 acre Organic Farm in Houston, Minnesota. Certified since 2008. Longer driveway provides an abundance of beauty & privacy to a 3-5 bedroom foam/block energy efficient home, built in 2002. Includes a large wrap around deck that has a spectacular view! 4 car garage, large steel framed machine shed, cattle shelter, grain bins, & more. Up to 126 acres tillable, 14 rotational grazing pastures, with 5 wire high tensile fencing, that can serve 45 cow/calf pairs. Woodland, and 5 ponds. We have 19 very gentle Black Angus/Hereford cows with 9 calves so far, and machinery available that could be purchased with the farm. Please call (507) 896-4620.

ORGANIC FARM & ORGANIC EGG FACILITY

F523 Wonewoc Turn-key organic egg facility w/50x500 building that holds 36,000 laying hens. 112 acres w/approx. 65 acres of organic tillable ground. Property includes 2 homes, 50x50 shop, 50x110 machine shed & barn. Additional land available. #1857126.

Call for further details.

GAVIN BROS | REAL ESTATE

296 East Main St., Reedsburg, WI 53959

O 608.524.6416 F 608.524.0292

Gavinbros.com

CERTIFIED ORGANIC PASTURE FOR RENT

Certified organic pasture with water; +-124 acres crop land partially fall plowed in Crawford County, WI farm 4944 MOSA certifications 9624 in 2018 previous 5070 & 7804. Also +-38 acres in Brownsville, MN farm 1458. Short or long term possible could be put in hay or crops. Present renter quit unexpectedly. Info 608/476-2331 or mothearthgreenc@aol.com.

CERTIFIED GRAZING LAND FOR RENT

17 Acres Organically Certified Grazing Land Available to Rent. Menomonie WI area. For 2019 (Can rotate every 2-3 days).

Contact lad@iglide.net.

CERTIFIED ORGANIC FARM

For sale, lease or other. Located in Dunn Co., WI. Grass-based - perfect opportunity for someone wanting to get into the grain free market. Presently home to 60 mixed breed dairy cows with room for more. 2-50x100 sheds with covered, drive through feed bunk, free stalls, calf barn stalls. All barns can be scraped into the lagoon. Milking parlor is double 4 with

8 units. Also being built is a double 8 swing parlor. Silo on premise presently not being used. Call Bud at 715-308-2425.

EQUIPMENT

FOUR ROW FLAMER

Four Row Flamer - was used for seed corn production. Brodhead, WI. Call 608-426-1726 or 608-921-3765 for more info.

EINBOCK 6 ROW 30 INCH CULTIVATOR & TINE WEEDER

Einbock 6 row 30 inch cultivator with camera guidance and finger weeder \$40,000 obo. Also have 15 ft. Einbock times weeder \$4,000. Call or txt 608-732-3807.

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.

<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

LEAD MECHANIC

In this position you will perform repairs as well as preventative maintenance on our fleet of field vehicles, tractors, irrigation equipment, implements, harvest & packing shed equipment. While a lot of work is done independently, must be willing & able to function as part of the farm team and communicate with management to determine priorities. This is a year-round position. During the winter months, tasks may also include snow removal, facilities maintenance and repairs or other tasks appropriate to skills and knowledge. Go to www.harmonyvalleyfarm.com to view the full job description. Submit cover letter and resume to bookkeeper@harmonyvalleyfarm.com

DELIVERY DRIVER(S)

We are looking for individuals with a valid CDL, clean driving record and experience driving tractor-trailer and/or straight trucks. We have three routes for our CSA delivery season, May-December. There is the potential for one applicant to be considered to fill two of the three routes. In this position you are expected to be more than just an operator for the truck. You will work with a helper(s) to unload vegetable boxes and set up each site on the route. Go to www.harmonyvalleyfarm.com to view the full job description and requirements. Submit cover letter and resume to bookkeeper@harmonyvalleyfarm.com.

FULL OR PART-TIME SEASONAL WORK

Sandbox Organics is a 4 acre (and growing) certified Organic farm located an hour and a half northwest of Chicago in Hebron, Illinois. We raise a wide range of high quality vegetables for our Chicago based CSA, farmer's market, and restaurants, as well as cut flowers and pastured hogs. We are looking for full-time or part-time seasonal workers to help with daily farm tasks for the 2019 season. Positions start early April through the end of October. If interested please submit a cover letter and resume with 3 professional references to SandboxOrganics@gmail.com

- Dust bathing and scratch materials must be provided.
- Air quality guidelines have been established: Ammonia levels should be maintained below 10 ppm, and must not exceed 25 ppm. Regular monitoring may be required if air quality is poor at inspection.
- Minimum indoor space guidelines have been established for layers:
 - Floor litter housing = 1.5 sq ft / bird
 - Mobile housing = 1 sq ft / bird
 - Aviary housing = 1 sq ft / bird
 - Slatted/mesh floor housing = 1.2 sq ft / bird
 - All other housing = 2 sq ft / bird
- Minimum indoor space guidelines have been established for pullets and broilers:
 - Pullets = 1 sq ft / bird
 - Broilers = 1 sq ft / bird
- Perching space is required for birds that perch and all birds should be able to perch at the same time, except in aviaries where at least 55% of the birds should be able to perch at the same time.

Operations not meeting these minimum requirements will need to provide rationale regarding adequacy of space that is provided.

Outdoor access for poultry -

- We will begin requiring outdoor access at 16 weeks for layers (pullets). All other poultry are required to be provided with outdoor access when fully feathered, as appropriate to the climate. Growers keeping pullets past 16 weeks will need to communicate plans to provide outdoor access after 16 weeks. New clients will need to provide land immediately, or after land transition is complete (maximum 36 months). Existing clients will need to plan to be in compliance within 5 years.
- We will continue to verify that all birds have ready access to the outdoors and that outdoor access is encouraged. On operations where birds do not go outside on a regular basis, we will be requiring a plan to provide birds meaningful outdoor access.
- Outdoor access areas must be at least 50% soil.
- Minimum outdoor space guidelines have been established for pullets, broilers, and layers.
 - Layers = 2 sq ft / bird
 - Pullets = 1 sq ft / bird
 - Broilers = 1 sq ft / bird

Operations not meeting these minimum requirements will need to provide rationale regarding adequacy of space that is provided.

Mammalian living conditions -

- Animals kept in stalls must be let out of the stalls daily.
- Calf housing should be situated so that individual calves are not isolated.
- Outdoor access time should be meaningful and maximized. Lanes to and from a destination are not generally regarded as adequate for the only outdoor access livestock receive.

Animal Transport - should be considered an extension of housing conditions.

- Animal welfare and comfort should be observed.
- Feed and water should be made available as needed especially if animals are in transport for more than 12 hours.

Origin of Livestock (OOL) Rule Clarification

Stakeholders continue to appeal to the NOP for action on the set-aside proposed rule and now it's rumored that the NOP may take up rule making again. We are hopeful to see the proposed rule move forward in the coming months. As a reminder, the [proposed rule](#) was published on April 28, 2015. As written, the proposed rule would:

- Allow a producer to transition nonorganic dairy animals to organic milk production one time. Multiple transitions would not be allowed.
- Require that transition be conducted over a single 12 month period. All animals must end transition at the same time.
- Continue to allow for the purchase/sale of transitioned animals between organic farms.
- Enable herd expansion during transition by allowing for the purchase of certified organic animals which is not currently allowed as a routine practice.
- Require that a transition be conducted on a dairy farm. Operations must milk animals.
- Clarify that fiber bearing animals are required to be organic from the last third of gestation.

Certifiers are currently assessing policies and will be making some updates this season to align with this direction.

Human manure (aka humanure, milorganite, sewage sludge, biosolids)

Sewage sludge, also known as solid waste, biosolids, or primary sewage, is treated differently than livestock waste under the National Organic Standards. *Sewage sludge* includes all forms of human waste, including waste from septic, outhouses, composting toilets, chamber pots, municipal waste management systems, etc. If sewage sludge is added to land it will put that particular parcel of land out of organic certification for 36 months (205.105 (g)).

A large amount of sewage sludge is incorporated into various manure and compost products and sold as conventional farm and garden products. Soil amendments that contain biosolids can also be labeled “organic” due to the carbon based nature of the ingredient, so certified organic farmers have to be even more cautious. Milorganite is a common material we are asked about and its use is prohibited. MOSA encourages you to contact us before application of any materials that have not been previously approved.

Sanitizers used in organic food production

In order to be allowed for use, sanitizers used in organic food production must have active ingredients that are on the National List of Allowed and Prohibited Substances for handling which include materials such as chlorine, hydrogen peroxide, phosphoric acid, peracetic acid and peroxyacetic acid. The use of unapproved products is only acceptable with certifier approval and with an adequate intervening event. An adequate intervening event may include an acceptable product or a water rinse, however the use of all products should also follow all label directions and be in compliance with any other regulations, such as the Pasteurized Milk Ordinance. A water rinse may not be appropriate or allowed by other regulatory authorities.

Handlers using tanker transport should ensure sanitation procedures are in compliance with all regulations. Wash tags should be verified for all incoming tankers and should state the full trade name of the sanitizer used and handler should ensure that the sanitizer is approved for use. All products used should be listed in your organic system plan paperwork. ■

SEEDS

COVER CROP SEEDS

Cereal rye, radish, turnip and many more cover crop seeds. Can make custom mixes too. Call to price yours today! Central MN. Paul 763-286-2037.

FORAGES/GRAINS

WANTED: ORGANIC STRAW

Rounds preferred, will consider big squares. Oat, barley, or wheat. Can haul, the closer to Fairchild, WI the better. Call 715.334.3583 or email betsyayr@gmail.com

ORGANIC EAR CORN

2018 Certified Organic Ear Corn for sale. Located near Fort Atkinson, Wisc. Call 920-650-2976.

ORGANIC RYE

Organic rye for sale. Feed quality. Sno Pac Farms, Caledonia MN. 507-725-5281.

COMMERCIAL

ELECTRIC WEEDER FOR RENT

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

To submit an ad to be posted in the printed version of the Organic Cultivator and on the MOSA website, send it to MOSA, PO Box 821, Viroqua, WI 54665, or email to mosa@mosaorganic.org.

All ads will be posted for 60 days free of charge for MOSA clients (100 words max). For non-clients, cost of an ad is \$5.00 for 40 words, and \$0.10 per word over 40 (max 100 words). MOSA does not guarantee that all products posted on this page are certified organic, and MOSA is not responsible for the accidental purchase of non-organic products through the use of this page. Always check to guarantee the certification status of any product before purchasing or using.

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