



INSIDE THIS ISSUE

DOUDLAH FARMS	1
FROM THE DIRECTOR	1
CERTIFICATION OF HEMP	4
SEEING BOTH SIDES, NOW	5
CERTIFICATION POLICY UPDATE	6
CLASSIFIEDS	12
EVENTS	13



FROM THE DIRECTOR

Cori Skolaski, Executive Director

Happy New Year! Here's hoping the new year and decade brings peace, happiness, and good luck to us all.

In early January MOSA sent, either via mail or electronically, the request that you update your paperwork. Please read the cover letter and checklist over carefully - they contain important information that will help you. Just like the NOP requires an annual inspection, also required is an updated organic system plan. Your updated paperwork is due in our office by April 1; if you'd like to request an extension call MOSA before April 1 and for \$60 we will ex-

see DIRECTOR on page 3

the ORGANIC Cultivator

VOL. 18 ISSUE 1 WINTER 2020

Mark Doudlah; FarmRite Organics™ powered by Doudlah Farms, LLC “Farma” for People

Joe Pedretti, Outreach Manager

“Once you get the ‘farming bug’ there is no cure, not like you can take a pill for it,” laughed Mark Doudlah, owner of Doudlah Farms, LLC and their branded label, FarmRite Organics™. “My Dad Earl had a big impact on my life as a farmer. He farmed 300 acres here in Southern Wisconsin (Evansville). I have been involved in production agriculture my entire life. I got my start in Agriculture in 1982 as a sophomore in high school. Dad rented me the first farm he bought in 1965 the year I was born. My son, Jason will be the 5th generation farmer. Jason is finishing up his farming short course at UW-Madison and plans to continue his BS in Agriculture. Jason was an important resource while we were considering industrial hemp production.”

“I was a conventional Chemical farmer until 2008. Once Dad was diagnosed



Early Season Hemp and Cover

see DOUDLAH FARMS on page 2



Hemp Harvest - Cut Plants

with Mantel Cell Lymphoma (a farmer's cancer). We were convinced by UW-Madison oncologists that pesticides and other chemicals were responsible for his cancer. It also put a new awareness as a whole to public health problems in general and my part in all of this as a farmer," reflected Mark.

"In Dad's honor, we decided to farm 40 acres organically. During this transition, we had a huge learning curve. We had to raise the bean head over the organic soybeans to top cut the weeds to give the soybeans sunlight. This was a steep learning curve. We had to learn what works and what doesn't. Healing the land is a long term process. Stimulating the biology is now the focus, and the old NPK paradigm goes on the backburner."

What accelerated this learning curve was meeting Jeff Moyer of Rodale Institute. "I sat in on a MOSES Organic Farming Conference about Crimped Cereal Rye. See our farm is 1/3 very productive, 1/3 average and 1/3 erodible (HEL). I was asking myself, 'How do we do organic on hilly (HEL) ground?' Sitting in that seminar was an eye opener. My Ah-ha moment. I realized that I had just planted cereal rye on all of my conventional corn ground. That gave me the confidence to transition 650 acres of cereal rye in corn stalks (some HEL) to organic soybeans by using the No-Till Crimped Cereal Rye Method that I just heard Jeff Moyer use and had already trothed at Rodale. What an inspiration!"

"Later I worked with Erin Silva at UW-Madison on No-Till Organic Corn. Now Corn is much more difficult than soybeans. Corn needs nitrogen early, which is hard to do at the right time. 1% of the energy used in the world is to produce synthetic nitrogen for corn in the USA alone. Enormous energy is needed to start corn," stated Mark. "We are trying to mimic that with biology and legumes. Rodale has been able to do organic No-Till corn, but they have a longer growing season in Pennsylvania and can get vetch to produce nitrogen at the right time and still terminate with a crimper."

Doudlah with his wife Lucy and son Jason currently farm 1,500 acres organically; 500 that he owns and

another 1,000 rented acres. The main crops are food grade soybeans and corn, specialty flint-dent corns, blacks, pintos and dark red kidney beans, along with a food grade hard red winter wheat. His cover crops are primarily cereal rye, vetch, daikon radish, buckwheat and clovers. "The limitation for organic cash crop grains is nitrogen. We have to grow more nitrogen, yes we have manures, but we need more legumes to grow more nitrogen and conducive biology to pull nitrogen from the atmosphere. We also need to think more about human health and what we grow dictates human health. Our farm slogan is 'Your Health is Deeply Rooted in Our Soils'™ noted Mark. This emphasis on human health and biological production led Mark to plant industrial hemp for the first time in 2019. "There were several little things that led to the decision. CBD (cannabidiol) from hemp is key to human health for some. We have all of the cannabinoid receptors. Due to propaganda, this crop was neglected for decades, but we're going to see that change quite quickly. We are interested in becoming part of that supply change for food, supplements and oils. CBD has been shown to give pain relief, anxiety relief, insomnia relief and many other benefits in the treatment of cancer. I am not qualified to talk about all the benefits, but every-



Hemp Hand Harvest

one should do their own research about all the benefits of CBD. As organic farmers we need to take back our markets including "Farma spelled with a 'F' not 'Ph'."

"I get excited about this crop. In my conventional days I was part of the problem. I thought I was feeding the world, but I was really making people sick. CBD is a way for organic farmers to improve profitability and be part of the human health solutions. The decline of human health has the ability to bankrupt this country, so it's important we get on the right track."

"Wisconsin is well positioned to grow industrial hemp. Our farm grew hemp back in the 1930's. We still had it growing wild on the farm into the 70's when I cut it out of our soybean fields with my dad at the age of 5. It sure would be great to have those genetics now. Hemp and tobacco have some production similarities, so the tools and the old tobacco drying sheds served this

hemp production well.”

“I was introduced to producing hemp in 2018, but due to the banking reservations and by-laws of the banking industry in Wisconsin, it was difficult to get the necessary financing or keep your operating loans so I decided against it at that time. However, the 2018



Hemp Into the Bin for Drying

Farm Bill, (which legalized hemp production at the federal level) made it possible in 2019. Getting a reliable seed source was the next big concern, and learning a lot more about hemp production. I made plans and bought T2 Trump hemp seeds, a variety for CBD production. I bought 35,000 seeds, enough for 20 acres, for \$1.00 per seed- a steep investment for a new crop. The seed came in a bag about the size of a 2 pound coffee bag. I thought ‘this can’t be \$35,000 worth of seeds?’” laughed Mark.

“To ensure the best germination, my son, Jason and I decided to transplant hemp seedlings instead of direct seeding them. My son raised 800 pastured organic certified broiler chickens while in high school, so we retrofitted the chicken tractors into small greenhouses.



Hemp in the Shed

We purchased 128 cell trays, a dimpler and a seeder. We then began the process of seeding the trays, which we covered with vermiculite. We got great germination. It

see DOUDLAH FARMS pg.13

tend your due date by 15 days. If you return your fully completed paperwork and payment to us by February 15 you will receive an Early Bird discount.

Coming up in February is the MOSES Organic Farm Conference in La Crosse, Wisconsin. That’s just up the road from our offices in Viroqua so, as always, MOSA will have a booth there. If you attend the conference, please drop by and say hello! If you’ve got any questions we’ll have lots of knowledgeable certification staff available to chat, but even if you don’t, we’d love to meet you.

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. ■

FEATURED EVENTS

Minnesota Organic Conference

January 09 -10 | St. Cloud, Minn.

Each year, the Minnesota Department of Ag hosts this conference and trade show for farmers and others interested in organic agriculture. MOSA is a sponsor of the conference, and will have a booth. 651-201-6134.

cassie.dahl@state.mn.us

Illinois Specialty Crops, Agritourism, and Organic Conference

January 10-11 | Springfield, IL

Participate in this annual event and find the educational programs, trade show exhibits, and networking to benefit your business and future success in the specialty crop industry. rscavuzzo@ILFB.org. 309-557-2155

12th Annual MOA Conference

January 23-25 | Independence, MO

The 12th annual MOA Conference - “Digging Deep” - will feature Tradd Cotter, Ray Archuleta, and Terry Durham, among many more great presenters. Join us for three days of learning and networking. MOSA is a sponsor, and will have a booth at the event. 660-834-3067.

info@moaorganic.org

OGRain Conference

January 24 -25 | Madison, Wisc.

Join the University of Wisconsin at this great event covering all things about organic grain! MOSA will have a booth. padgham@wisc.edu

MOSES Organic Farming Conference

February 27 -29 | La Crosse, Wisc.

Join us for our 31st annual conference to be educated, inspired, and empowered to be the best organic and sustainable farmer you can. MOSA is a sponsor, and will have a booth at the event. 888-90-MOSES (906-6737).

info@mosesorganic.org

THE FACTS ABOUT USDA ORGANIC CERTIFICATION OF HEMP

As a result of the 2018 Farm Bill, farmers in the U.S. can now grow hemp under certain regulated situations. The USDA National Organic Program (NOP) has also confirmed that hemp managed organically can be certified organic.

MOSA currently certifies nearly 50 hemp and hemp processing operations. We can help you access this rapidly growing market.

Hemp is now technically legal in all 50 states, but production can only occur in states that have a licensing and registration program, and production is limited to these authorized growers. To comply with state regulations for commercial and research programs, growers and processors must be licensed, registered or permitted with the state agency overseeing program.

Requirements for registration, licenses and permits vary from state to state. At least 41 states have enacted legislation to establish hemp cultivation and production programs.

Visit this website for Industrial Hemp Information by State:

https://datcp.wi.gov/Pages/Programs_Services/IHOtherStates.aspx

What Forms of Hemp can be Certified as Organic?

We can certify any part or derivative of the hemp plant, including hemp hearts, hemp oil, grain, seed, fiber, etc. We can also certify CBD oil and other CBD products as long as the oil extraction method complies with the National Organic Standards. CBD food products or products making a health care claim cannot be certified organic.

The concentration of delta-9 tetrahydrocannabinol (THC) can not be more than 0.3 percent on a dry weight basis.

What will Licensing/Registration Entail for Growers/ Processors?

To comply with state regulations growers and processors must be licensed, registered or permitted with the state agency overseeing program. Requirements for registration, licenses and permits vary from state to state and might include:

- Criminal background checks.
- Periodic renewals, usually every 1 to 3 years.
- Registering the location or Global Positioning System (GPS) coordinates of grow sites.
- Record keeping and reporting any sales or distributions including to whom it was sold or distributed.
- Documentation from the state agency or institution of higher education to prove the grower is participating in an approved program.
- The state agencies overseeing these programs are typically authorized to conduct inspections, test the plants and review records. State agencies may revoke licenses and impose civil and criminal penalties against growers who violate regulations.

What do I have to do to Certify My Hemp Crop or Hemp Product as Organic?

If you plan to certify a hemp crop, you will need to complete an application for certification as a "Producer." If you plan to grow organic hemp and process it into a new form, you will need to complete an application as a "Producer-Handler." If you purchase the raw product and only process it to its final form, then you need to complete an application as a "Handler."

You can find the specifics of certification and the current fee schedules on the MOSA website: "Organic Certification with MOSA."

Farms will usually, but not always, have to transition to organic before they can be certified. A crop can only be certified if the land has been managed without the use of prohibited materials (synthetic fertilizers and pesticides) for 36 months before the crop is harvested.

Land that is currently being farmed with chemical fertilizers and pesticides will likely have to undergo a full three year transition. If the land has never been farmed, or it has been some time since the last application of a prohibited material, it may immediately qualify, or take a shorter period of time to transition. To determine how long each field will take, simply determine the last date a prohibited material was applied, and then move forward 36 months. That is the date when that field will be certifiable. It is common to have fields with different transition times.

The certification process can take three months or more to complete, so it is best to apply several months in advance of your planned harvest.

SEEING BOTH SIDES, NOW

Stephen Walker, Operations Manager

Since summer, I've had several opportunities to engage with organic leaders face-to-face, to hear perspectives around organic values, struggles and regulations. Through difficult times, this organic community proceeds with passion and intent. We discern the best path for continuous improvement, while sympathetic toward conflicting perspectives. Sometimes organic policy discussion shows democracy at its best. Other times it exhibits the limitations and failures of bureaucracy, politics, and humans. This work is like something I heard on a Sunday morning a few weeks ago: we must live through what is temporary without losing what is eternal.

In late October, with MOSA's Policy Manager, Jackie DeMinter, I again represented MOSA at the [National Organic Standards Board \(NOSB\) meeting, in Pittsburgh](#). We participated in discussion around diverse topics like organic's impact on climate, paper pots in organic production, cultural diversity in our organic community, and impact of NOSB decisions on human health. This was the 56th NOSB meeting, with votes on seven proposals, and consideration of several discussion documents and 50 "sunset" materials. MOSA and other stakeholders submitted over 10,000 written comments. Jackie and I were part of 14 hours of oral testimony. Thoughtful Board members pressed for clear information. Beyond the agenda, we considered gene editing, frustration with the pace of rulemaking, and needed clarity in livestock and container growing regulations. We also heard from an expert panel on marine materials, as the Board considers the environmental impact of harvesting seaweeds used as fertilizers.

NOSB Chair Harriet Behar provided strong opening remarks, speaking to conflicts, organic values, bureaucracy, and, well, not losing sight of the eternal:

"I see the many benefits organic agriculture has on local, regional and global ecosystems, the economic security it provides to individual families and larger rural communities... While there may be different viewpoints and needs of the various stakeholders which results in lively conversations within the NOSB and with all of you, we all share the same desire to protect the value and meaning of the organic label in the marketplace. Participating in organic certification is a conscious and voluntary act. I understand that the National Organic Program works within the constraints of the larger U.S. government, and political process and slow is the work of rulemaking. But I do see organics at a crossroads where many issues need immediate attention and solutions... Too many of our recommendations are in limbo, and as time passes, the need becomes more urgent."

She provided numerous examples where delay en-

ables harm: not implementing the recommendation to protect native ecosystems from destruction and then immediate organic certification; delayed origin of livestock recommendation implementation, causing great financial stress for dairy operations; lack of consistent, strict pasture regulation enforcement; a need for strengthening certifier oversight; and, hydroponic issues, where the NOP has not allowed further work although NOSB's 2017 vote was frustratingly indecisive. She added, "The organic community will keep talking about these issues until they are solved. We are passionate and tenacious. I think the USDA already knows that."

The public-private partnership

Behar's opening remarks indicated symptoms of organic's troubled public-private partnership. In the past 10 years, the USDA has not completed rulemaking on any of 20 consensus recommendations for organic standards improvement. Organic innovation has outpaced regulation, and NOP's failure to keep up creates fragmentation and harm. At the National Organic Coalition's Pre-NOSB meeting, we heard about the Organic Trade Association's white paper on the subject, which argues that advancing the voluntary organic standards is essential to farmers' future. OTA proposes some new framework for accountability. "USDA should rely on NOSB consensus recommendations as the will of the industry." The paper says standards for this voluntary, opt-in organic program should advance differently than for mandatory regulations. Proposals include:

- Including NOSB consensus recommendations on the Unified Regulatory Agenda with a published timeline for action.
- Removal from the Unified Agenda must require public and congressional notification with rationale why widely supported standards questions aren't moving forward.
- The Office of Management and Budget (OMB) review must consider the costs when standards are inconsistent or insufficient to meet market demand.
- Economically insignificant rulemaking, based on a consensus NOSB recommendation, should not be designated a "novel policy" requiring OMB review. This would significantly shorten the standards implementation timeline.

The white paper notes that continuous improvement, an organic bedrock, should be defined in the regulations AND law, to foster soil health, biodiversity, and natural resource conservation.

CERTIFICATION POLICY UPDATE

by Jackie DeMinter, Certification Policy Manager

National Organic Program Update: National List Changes

Origin of Livestock (OOL) Proposed Rule Comment period re-opened

Stakeholder appeals were heard! While it wasn't the final rule we'd hoped for, on October 1, 2019, the National Organic Program (NOP) reopened the public comment period for the [Origin of Livestock proposed rule](#) originally published in 2015. The comment period was open for 60 days: October 1 - December 2, 2019. We did our best to engage stakeholders through a mailing several weeks ago, and via email and website notices and we hope you made your voice heard! Over 650 comments were received and will be evaluated along with the 1,580 comments received in 2015 in preparation of the final rule. Reopening the public comment period was an effort to give people who did not do so in 2015 a chance to submit comments, and for those that did comment, an opportunity to submit updated information, if needed, to inform USDA's development of a final rule. We are hopeful for the speedy release of a final rule with an immediate implementation date.

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, including dairy youngstock, must end transition at the same time. All animals must consume 3T or organic feed during transition.
- Continue to allow for the purchase/sale of transitioned animals between organic farms.
- Enable herd expansion during transition by allowing for the purchase of certified organic animals during transition.
- Require that a transition be conducted on a dairy farm. Operations must milk animals.
- Clarify that fiber bearing animals are required to be organic from the last third of gestation.

The action applies to you if you are engaged in the dairy industry. Potentially affected entities include but are not limited to:

- Individuals or business entities that are considering starting a new dairy farm and that plan to seek organic certification for that farm.
- Existing dairy farms that are currently certified organic under the USDA organic regulations.
- Existing conventional dairy farms that are considering converting their farm to certified organic production.
- Businesses engaged in raising heifers for sale to certified organic operations.

Summary of Provisions

This proposed rule would update the regulation by explicitly requiring that milk or milk products labeled, sold, or represented as organic be from dairy animals organically managed since at least the last third of gestation, with a one-time exception for transition. This exception would allow a producer, as defined by the regulations, to transition nonorganic dairy animals to organic milk production one time, under specific conditions.

This proposal would specify that a producer (e.g., an individual or corporation starting or operating a dairy farm) could transition nonorganic dairy animals to organic milk production one time over a single twelve-month period. The proposal would require that all transitioning animals complete the transition process at the same time. This twelve-month period is consistent with the Organic Food Production Act's (OFPA) requirement that there be a minimum period of one year of organic management before milk from dairy animals can be sold as organic (7 U.S.C. 6509(e)(2)).

This proposal would specify that, once the transition into organic production is complete, that a producer would not be allowed to conduct any additional transitions. After the transition, the producer would only be able to expand the number of dairy animals or replace culled dairy animals on any dairy farm in two ways: (1) Add dairy animals that had been under continuous organic management since the last third of gestation, or (2) add transitioned dairy animals that had already completed the transition on another dairy farm during that producer's one-time transition.

The proposal would define a dairy farm as “specific premises with a milking parlor where at least one lactating animal is milked.” For the purpose of this definition, a milking parlor should be considered a physical structure (e.g., barn, parlor) in which dairy animals are milked. Because the dairy farm definition, in part, drives the eligibility for a producer to transition animals to organic production, this action would mean that producers that only raise heifers for organic dairy farms would not be eligible to transition conventional animals to organic. Such producers do not milk animals and, therefore, would not be considered eligible for the one-time transition exception. However, such producers could continue raising heifers for organic dairy farms as long as the animals were under continuous organic management from the last third of gestation.

This proposed rule reiterates that breeder stock may be brought from a nonorganic operation onto an organic operation at any time. While the regulations prohibit organic livestock from being removed and managed on a nonorganic operation and subsequently returned to an organic operation (e.g., cycling in and out of organic production), this provision does not extend to nonorganic breeder stock that are themselves not certified or eligible for slaughter, sale, or labeling as organic. Further, OFPA specifically allows breeder stock to be purchased from any source if the stock is not in its last third of gestation. Consistent with OFPA and USDA organic regulations, a producer has flexibility in its sourcing and its management of nonorganic breeder stock after its organic offspring is weaned and before it begins the last third of gestation for the next offspring. However, a producer must continue to prevent commingling of organic and nonorganic products and prevent contact of any organic production or products with prohibited substances (7 CFR 205.201(a)(5)). AMS is proposing additional provisions for organic management of breeder stock during the time when the breeder stock is directly contributing to the nourishment of organic offspring, from the last third of gestation through the end of the nursing period.

The AMS requested comments on the following topics.

1. The cost and benefit analysis presented, including assumptions and estimates, of limiting dairy transition to a one-time exception for a given producer;
2. Procedures that certifying agents would use under this proposal to determine whether a producer is eligible for the one-time transition; and
3. The proposed implementation approach for this rule:
 - a) Producers who are certified as of the effective date for any final action would be allowed to complete any transition that was already approved under their organic system plan by a certifying agent. However, as of the effective date, producers who are certified would be required to source or raise any new animals from the last third of gestation or source animals already transitioned under another producer’s one-time exception.
 - b) As of the effective date, producers who are new applicants for organic certification (i.e., startup organic dairies or nonorganic dairies transitioning to organic production) would be allowed to use the transition exception once when first applying for organic certification.

Organic Dairy Compliance Course Now Available

The NOP notice below explains the new Organic Dairy Compliance course and gives additional information for Organic Integrity Learning Center account set up. MOSA staff and inspectors are incorporating the new courses into our training programs. Courses are geared for a variety of audiences and are an insight into NOP requirements on specific topics. We encourage you to take courses applicable to your operation.

If you have a dairy operation or are otherwise interested in organic dairy herd compliance requirements, this course offers an excellent training on the “pasture” regulation and NOP expectations for compliance. The NOP presentation clearly states that the *minimum* grazing season required is 120 days, no less. Approved temporary confinement days may not reduce the grazing season below 120 days. All animals must be grazed on pasture for the grazing season for the geographic region, but animals must be grazed for, at *minimum*, 120 days. Certifiers are encouraged to work with regional specialists to establish true grazing seasons for areas certification services are offered because, though 120 days is the minimum, certifiers are expected to enforce the *actual* grazing season for the region.

“A new course on Organic Dairy Compliance is now available in the free, online Organic Integrity Learning Center. The course provides an overview of the USDA organic livestock standards with a special focus on dairy operations. Target audiences include certifiers, inspectors and reviewers who assess organic dairies for compliance with the USDA organic regula-

Vaccines from excluded methods

Among meeting highlights, the NOSB closed an exception that's allowed some GMO vaccines. Our regulations have always prevented excluded methods, except for livestock vaccines. But, that has been inconsistently regulated. Going forward, vaccines from excluded methods will be allowed only when an equivalent non-GMO vaccine isn't commercially available.

[MOSA comments](#) stressed vaccines' importance in the organic farmer's toolbox. To date, we have simply allowed the use of vaccines. But, we can support the change to require commercial availability assessment, given adequate resource development for review accuracy and efficiency.

One evening, we witnessed one NOSB member's vehement reaction to a conflicting opinion on vaccines. Earlier that day, a colleague testified with their opinion that vaccines shouldn't be restricted by the non-GMO commercial availability requirement. Their comment had received little reaction during the meeting. But, at a reception that evening, the NOSB member heatedly and closely expressed disagreement, even expectorating as they ranted. The NOSB milieu is a democratic, not dictatorial, respectful forum which typically encourages diverse perspectives. So, this was an unusual and inappropriate display. But, fueled by fear about implicit GMO acceptance plus uncertainty over upcoming USDA appointments of new NOSB members, perhaps in this firebrand Board member's view (as a MOSA staff person quipped) "the ends justify the mist." I see both sides, but then, no one spit in my eye.

Other GMO issues

In June, before the House Agriculture Subcommittee, Under Secretary Greg Ibach controversially suggested there should be more discussion around gene editing within organic. This was a troubling comment; Secretary Perdue has been friendly toward biotechnology. Organized opposition followed Ibach's comments. Since 2016, the NOSB's Excluded Methods Terminology recommendation has given framework and criteria for determining which genetic manipulations must be prohibited in the NOP regulations. Gene editing techniques were unanimously defined as prohibited. In Pittsburgh, NOP Deputy Administrator Dr. Jenny Tucker affirmed that gene editing is prohibited under the current regulatory definitions, that changing the definition of excluded methods is not on the agenda, and said USDA has encouraged a "robust dialogue" about the role of new technologies and innovations in organic agriculture. Board member Dave Mortenson cautioned that further "robust dialogue" could be a slippery slope.

The NOSB continued its GMO definitions work. Induced mutagenesis produced via in vitro nucleic acid techniques was classified as an excluded method (prohibited), and livestock embryo transfer was classified as allowed, if the recipient animal is not treated with hormones.

The NOSB also made a recommendation regarding Genetic Integrity Transparency of Seed Grown on Organic Land. Certifiers should instruct producers to ask seed suppliers for levels of inadvertent GMO content in seed, to encourage awareness, data collection, and choice. MOSA's comments stressed that the GMO contamination prevention burden must be shared with conventional producers. In my testimony, I said, *"Our community is united in opposition to genetic engineering in organic systems. We're sort of done talking about it. But, with ongoing outside threats, our thoughtful discussion must be heard elsewhere. Beyond preaching to the choir, we must be heard on the street, to protect our interests. USDA must invest in a more functional coexistence."* I noted the need for more transparency from biotech developers, reminding of a Lutheran ["Genetics, Faith and Responsibility"](#) statement I'd brought to 2014 NOSB discussion. That says, human beings are innovative stewards called to be responsible to the Golden Rule, and must respect and promote the community of life with justice and wisdom. I added, *"This imperative should be used to direct genetic research and knowledge in agriculture and other arenas. It's a moral requirement for those with expertise to share knowledge with policy developers. Our robust conversation shows we're honoring our side of the coexistence concept. We need more fairness and transparency from USDA."*

Need for clarity on container production

We've been awaiting more transparent clarification on whether all organic container production sites must wait three years following any prohibited substance application. Dr. Tucker had sent certifiers a June memo stating *"(This) clarifies that the legal requirements related to the three-year transition period apply to all container systems built and maintained on land."*

MOSA and others have struggled to interpret whether "on land" includes systems like a greenhouse on a concrete pad, or a warehouse. Many public comments, and NOSB's Emily Oakley, pushed for clarity whether the three-year transition applies to every organic operation, without exception. But Tucker sidestepped, noting she'd make a statement after public comments concluded. Her statement simply reiterated the June memo,

saying all container-based production systems must meet existing regulatory requirements, and it's certifiers' responsibility to evaluate land use histories for compliance. I found this to be very frustrating, not clarifying the scope of "on land." But, certifiers are charged with making a decision.

One evening in Pittsburgh, over 30 certifiers and other supporters of the Accredited Certifiers Association (ACA) met and shared our uncertainty and varying stances on interpretation. ACA members now agree to create a container production best practices document, and encourage NOP to address this issue at our training in San Antonio in January. MOSA also advocates for enabling the NOSB to again take up container production discussion, which was dropped since being left on the table after the 2017 hydroponic vote.

At the ACA meeting, I recognized NOP's precarious position in this discussion. Perhaps they support reasonable exceptions, but are pressed to satisfy an oppositional, vocal portion of the organic community. And NOP must operate within the regulations as written. As I write this, I'm not sure whether my desk is on land. I see both sides.

Celery powder

The NOSB passed a recommendation to continue to allow non-organic celery powder in organic products, since organic forms are not yet commercially available. Celery powder contains natural nitrate, functioning as a curing agent, when added to high-demand organic meat products like bacon and hot dogs. However, the nitrates are converted to nitrosamines in processing, which may be carcinogenic. This sparked debate whether the NOSB should consider end use when reapproving the celery powder listing. Demand and the lack of an organic form of celery powder show a need for an organic alternative. To that end, the OTA, Organic Center and University of Wisconsin were awarded nearly \$2 million in research funds to develop an organic celery powder alternative.

Other meeting outcomes

All proposals considered by the NOSB passed, and are now referred to the USDA. Other approvals included allowing fatty alcohols for sucker control in tobacco production. (This also raised concern about end use and health, but discussion from the other side spoke to consumer choice, and showed how tobacco sales enable financial viability as farms grow other crops.) Potassium hypochlorite was approved for use as irrigation water treatment. And proposed research priorities updates to the NOSB Policy and Procedures Manual were approved. The NOSB also completed the 2021 Sunset Review process for over 50 currently allowed inputs, with alginic acid and dairy cultures recommended for removal from the National List. Cultures' allowance continues under the broader Microorganisms listing.

Work to be done

After quoting some Joni Mitchell lyrics - "You don't know what you got, till it's gone" - Harriet Behar also cautioned that we not lose organic's promise as we persist with regulatory struggles.

"We have all experienced and know of the effects of human-caused climate change, with weather events becoming more extreme and negatively affecting agricultural production of all types... Our quality of life, our livelihoods, and our futures are at stake. Organic agriculture provides concrete solutions to many environmental crises. The carbon we sequester in our sod crops and use of cover crops can slow climate change and as more farmers around the world adopt organic production methods, can even work to heal the damage humans have caused. Our reliance on naturally based inputs instead of fossil fuel-based chemicals, illustrates organic is a viable and productive way of farming. Our dismissal that toxic materials and genetic engineering have no place on our land or in our food, offers a practical and proven pathway to healthier practices for the production of food and fiber, that support other forms of life rather than endangering them. Organic agriculture can feed the world. In fact, we must be THE path of the agricultural future - if we plan to have one.

"We must keep improving the implementation and meaning of our organic regulations. We cannot take short cuts, we cannot ignore the difficult issues, we cannot let those that are powerful overtake the organic label for their own economic gain... It is difficult to take a complex system like organics and put it into a regulation that has no loopholes and mandates certifiers and operators be consistently good to excellent in their regulatory implementation. We all have to be committed to the path of organic integrity and continue our work, however difficult, to do what needs to be done."

Optimism and dreams

It's been some hard times here in the dairyland. I've sometimes struggled to remain optimistic about organic, in the face of a struggling agricultural economy, regulatory frustration, and pervasive divisiveness. And sometimes we're picked up by others. In a couple recent conversations, MOSA Certification Specialist Stephanie Leahy drew

Food processors, restaurants, distributors, and retailers do not have a required transition period if they are not growing their own crops (purchasing all inputs) and can apply at any time.

What additional paperwork does MOSA require?

A current copy of the license to grow or process needs to be submitted and maintained in the file. We'll collect the registration paperwork or verification of renewal annually. In addition, the grower or processor will need to sign MOSA's Hemp Affirmation Form.

Can MOSA Certify Medical or Recreational Cannabis (Marijuana) in Legal States?

No. Medical and recreational cannabis remains illegal at the federal level and cannot be certified organic to the USDA National Organic Standards.

Can MOSA Certify Greenhouse, Hydroponic and Aquaponic Hemp Operations?

MOSA certifies plant crops in greenhouse containers, hydroponic and aquaponic systems, however, we cannot certify the fish in aquaponic systems, nor do we certify operations with aeroponic systems. Water-based systems that utilize organic matter as substrate, or add insoluble organic fertility materials and rely on biological nutrient cycling can potentially be certified organic. These type of production systems will also need to complete a "Greenhouse Organic System Plan."

Does MOSA Certify other Organic Hemp Operations?

Yes, MOSA has been a leader in the certification of organic hemp. As of 2019, we certify nearly 50 clients that grow or process hemp in several states. We are very familiar with both the production and processing of hemp and we can help you reach your goal of producing USDA Certified Organic hemp products. ■

Resources:

[US Federal Register: Statement of Principles on Industrial Hemp](#)

[National Conference of State Legislatures: State Industrial Hemp Statutes](#)

[MOSES Guidebook for Certification.](#)

was about as easy as growing transplants for tobacco. We retrofitted an old Ellis Tobacco setter and transplanted the hemp into rows with 48" between plants and 90" between rows. We decided to add a liquid organic fertilizer, humic and biology to the transplant water. We then came back the same day; and planted a cover crop so we would mow for weed control rather than cultivate."

"We put down three (3) bushels of cereal rye per acre and twenty-five pounds of medium red clover seed. We then went over the whole field with our roller crimper, which is more like an old cultipacker. We wanted the immediate seed to soil contact to get our cover crop started for the weed control. The rolling did not faze the small hemp plants. The cover crop gave us weed control, moisture control, erosion control, nitrogen productions and biological activity as it was mowed into the row" said Mark.

"Jason modified a push mower to pull alongside a rider to mow the alley in just one pass. It took approximately 30 hours to do the 20 acres with the dual mowing system. We also used a stand up mower with a 36" deck to mow between the plants. The mowing helped a lot with eliminating early weed escapes and establishing the red clover. Wet weather can really degrade a hemp crop. The rain and the wind can splash dirt and knock over plants. We had a really rainy 2019 with some high winds, so a lot of the hemp plants were laying down after a heavy rain event. I am a big believer in cover crops to protect the plant and soil from damage. It also perfectly sets us up to rotate to corn the following year, since we have such good weed control and a tremendous amount of nitrogen production with the red clover. We also hand-hoed each plant twice around the base of each hemp plant to clear weeds and push back the cover crop to give the hemp a solid start," explained Mark.

Hemp harvested for CBD production only uses the flower and the leaves, not the fibrous stems. Hemp is dioecious, which means that there are separate male and female plants. Only the female plant is used for CBD production. CBD is produced in the flowers in special resin glands called trichomes that only occur in the female flower and surrounding leaves. THC, which is the active component in marijuana, must be less than 0.3% in industrial hemp by law. CBD levels vary, depending upon the hemp variety and other factors, but the value of the crop increases with higher CBD levels.

"I did not have as great a risk as some other growers. The hemp seeds I bought were feminized, so I was guaranteed that 99% of my plants would be female. Out of 35,000 seeds, we only had to pull 320 males. Some growers that bought regular seed, averaged 50-60% males. Pulling those out is labor intensive and lacks field production uniformity." noted Mark.

tions, as well organic livestock and dairy operations interested in gaining a better understanding of the federal requirements.

Course lessons include:

- *Livestock Requirements Refresher*
- *Defining the Grazing Season*
- *Discontinuous Grazing and Confinement*
- *Best Practices for Inspecting Dairy Operations*

Access the New Course

- *People with an Account: Access the Learning Center at <http://usda.blackboard.com/>.*
- *People without an Account: Review "Getting Started" information and sign up for an account at <https://www.ams.usda.gov/services/organic-certification/training>.*
- *For questions about the Organic Integrity Learning Center, contact USDA-NOP@apvit.com.*

About the Organic Integrity Learning Center

The online training, available 24/7 through the Organic Integrity Learning Center, is designed to continually reinforce consistent application of the federal regulations by accredited certifiers. The Learning Center supports professional development and continuing education for organic professionals working around the world to ensure producer and consumer confidence in the integrity of USDA organic certification.

NOP Publishes Letter on Organic Crop Container Systems

On June 3, 2019, the National Organic Program (NOP) published a letter to certifiers titled, "Certification of Organic Crop Container Systems." This memo summarizes the rules that certifiers must follow when determining the eligibility and compliance of land used in organic crop container systems. The letter clarifies the three-year transition period applies to all container systems built and maintained on land. The letter intended to clarify that an operation could not spray land with a prohibited substance, cover the sprayed land in plastic (forming a barrier between the containers and the land), and then use the site for organic container production. However, the letter has also sparked some debate and discussion as to whether or not the three year requirement should apply to greenhouse operations which do not use land in their production - transplant operations were used as an example. MOSA will continue to only apply the three year transition requirement to an operation using land in production.

National List Final Rules

On October 23rd, a final rule was published to amend the National List of Allowed and Prohibited Substances (National List) based on public input and the April 2018 recommendations from the National Organic Standards Board. The final rule is effective November 22, 2019.

This final rule:

- Allows **elemental sulfur** to be used as a slug or snail bait to reduce crop losses.
- Allows **polyoxin D zinc salt** for plant disease control.
- Reclassifies **magnesium chloride** from a synthetic to a non-synthetic substance.

On October 8th, a final rule was published relisting 26 substances based on the recommendation from the National Organic Standards Board as a result of each material's sunset review.

This [final rule](#) relists the following materials for use, with applicable annotations as listed on §205.601, in organic crop production. Chlorine materials: calcium hypochlorite, chlorine dioxide, sodium hypochlorite; Herbicides, soap-based; Mulches: Biodegradable biobased mulch film; Boric acid; Sticky traps/barriers; Coppers, fixed; Copper sulfate; Humic acids; and Vitamins C and E (B1 is recommended for removal from the National List).

Lead salts and Tobacco dust (nicotine sulfate) will remain listed on §205.602 as materials prohibited in organic crop production.

Materials that will remain listed on §205.603 for use in organic livestock production include: Chlorine materials: calcium hypochlorite, chlorine dioxide, sodium hypochlorite; Glucose; Tolazoline (CAS# 59-98-3); and Copper Sulfate. Current annotations apply.

Oxytocin and Procaine are recommended for removal from §205.603 and would no longer be allowed for use in

CLASSIFIEDS

LIVESTOCK

A2A2 JERSEY COWS

MOSA certified organic, A2A2 jersey cows for sale. Many ages available, ideally sell a starter herd. Call Chaz at 715-441-0362 or email thebrfamily@gmail.com. New Holstein, WI.

HONEY BEE NUCS

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

ORGANIC BEEF & DAIRY SLAUGHTER COWS

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

ORGANIC COWS- HOLSTEIN & FLECKVIEH

Selling herd of organic cows, 26 Holsteins, 4 Fleckvieh, 5 heifers due in October and 25 younger animals. Call Ron Heebink at 715-977-0602. Baldwin, WI

RED WORMS & CASTINGS

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

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

Crescent Meats - Cadott, WI Family Owned For 15 Years Full Service Slaughter Facility Phone: 715.289.3000 crescentqualitymeats.com

LANDS / FARMS

ORGANIC FARM

Organic farm for sale. 200 acres w/ 157 acres certified organic. Property has 100,000 bu grain storage, 3 Morton machine sheds and drive over truck scale. Fully fenced with waters can be used as crop, cattle or combination farm. Additional 100 acres available to rent at this time of which 35 acres are certified organic and 65 acres are in their last year of transition. Also an additional 258 acres available for lease in the 2021 crop year. Garden Grove, IA. Contact 563-357-4467

EQUIPMENT

MUELLER BULK TANK TEMPERATURE RECORDER

Mueller Bulk Tank Temperature Recorder. Good used condition. Manual included. 110 Volt AC or 12 Volt DC operation. \$480. Located in SW MO. Call Roman at 417-628-3229 for information.

JOHN DEERE 494 CORN HEAD

John Deere 494 Corn head. Poly snouts off 9510 sidehill combine. Menomonie, WI. Call 715-495-2813.

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.

VEGETABLES/SEEDS

ORGANIC GARLIC

1000+ pounds of German Extra Hardy Garlic. 2" - 2.5" bulbs. Approximately 7 bulbs per pound. Very dry. Contact Bobby at 765-256-0103. Mooreland, IN.

CERTIFIED ORGANIC RYE SEED

Certified organic rye seed for sale. Located near Wausau, Wisc. Call 715-571-6714.

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

2019 ORGANIC BALEAGE

1st, 2nd, 3rd and 4th cut bales. Also triticale/oats, and oats/peas, and new seedling/regrowth baleage. 3x3x6 foot bales, individually wrapped. Call Paul Proksch at 608-498-2882. Stoddard/Chaseburg.

CERTIFIED ORGANIC BALEAGE

Certified organic baleage with RFQ ranging from 110-230 on 1st, 2nd, 3rd and 4th crops. Available in alfalfa, clover and grass or alfalfa/grass. Approx. 3x3x6' large square bales that are rotor sliced and individually well wrapped. Call 920-366-9708. NE WI

2019 ORGANIC HAY

Certified Organic Baleage. 1st, 2nd & possibly some 3rd crop. Have Feed Samples. Mostly 35-40% moisture. Elk Mound, WI. 715-577-4577

ORGANIC HAY

Certified Organic Hay for sale, Dry and Silage Bales, 1st, 2nd, and 3rd Crop. Delivery Available. Sno Pac Farms, Caledonia, MN 507-725-5281

2019 ORGANIC HAY

2019 Organic Hay. 4x5 net-wrapped, roto cut round bales. 1st, 2nd & 3rd crop. Both dry hay and baleage. Menomonie, WI. Call 715-495-2813.

ORGANIC STRAW

Certified organic straw round bales for sale. Wausau, Wisc. Call 715-571-6714.

ORGANIC HAY

Certified organic 1st, 2nd, and 3rd cutting hay for sale. Have RFQ testing for hay. Located near Wausau, Wisc. Call 715-571-6714.

ORGANIC SHELL CORN

MOSA Certified Organic Shell Corn. Pick up on farm or delivery can be arranged locally for a fee. Call Benuel at 765-886-1176. Greensfork, IN.

ORGANIC ROASTED SOYBEANS

Certified organic roasted soybeans. \$900/ton. Contact John S. Bornreger at S769 Dell Road, Cashton, WI.

CERTIFIED ORGANIC RYE SEED

Certified organic rye seed for sale. Located near Wausau, Wisc. Call 715-571-6714.

ORGANIC HAY

MOSA certified organic 1st cutting hay. 122 bales 7.5 ft long 3by3. 2nd cut 63 bales 7.5 ft long 3by3. 3rd cut 90 bales 7 ft long 3by3. At this time we do not have feed values. Call Ervin at 608-426-1726 or Milton at 608-921-3765. Brodhead, WI.

COMMERCIAL**ELECTRIC WEEDER FOR RENT**

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

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

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

“We are currently working with a company to bring the price of seed down and CBD levels up. The industry is striving for 10%+ CBD out of the biomass. Eventually, the cost of seed will decrease exponentially. We are hoping for approximately \$0.40 per seed next year. The whole industry is developing quickly. Europe is already harvesting seed, flower, and fiber in one pass.

Hemp harvested for other uses, such as fiber for paper or rope, will use both male and female plants and those varieties will have very different characteristics. When marijuana was classified as a Schedule 1 controlled substance in the 70's, the entire national hemp seed bank was destroyed. A lot of genetic diversity was lost as a result. Since the 2018 Farm Bill \$500,000 was allocated to restore a national hemp seed bank. Eventually, specialized varieties will become more readily available.”

“Hemp is usually ready to harvest in late September-early October. For a CBD crop, that is when the resin glands sill and turn a golden color, which indicates maximum CBD levels. DATCP was notified and sampled our field to ensure THC was less than 0.399% and issued a Fit for Commerce Certificate.”

“We harvested and dried the hemp in two different ways. We had shed space for about half of the crop. About 15,000 plants were hand harvested, speared onto a lathe, and hung in the existing tobacco drying sheds to cure. Hemp plants can have a 3” trunk, which is nearly impossible to spear, so we had to spear higher up the stem and dry it trunk down. The tobacco shed worked very well for this process. The curing process for hemp is similar to tobacco. The hemp flower is very tight, so mold can be a problem. We added five large barn fans to circulate air in the shed to control humidity.”

“The other half was harvested with a modified whole plant chopper that was developed previously for native seed and then dried in an air dry bin used for corn and bean drying. The bin also worked well, but the trichomes are very fragile, so there is some quality loss with this chopping process. The modified harvester helped to minimize the damage. UW-Madison Ag Engineering is procuring grants to work on new dryers and

threshers to reduce quality losses and improve efficiency for Wisconsin growers.”

“After a lot of weekly testing it was proven that there were higher CBD levels in the hemp cured in the drying sheds. I am not sure if that will justify the extra manual labor and costs at this time,” noted Mark.

“To finally complete the harvest of the shed dried plants, we built a ‘bucker’ which is a machine to strip the leaves and flowers from the stem. It worked well, but was very time consuming. A hemp plant can have 20-30 stems to put through the buckers. To speed the process up we also made a thresher and married it to a large fan and cyclone to pull the leaves and flowers away from the threshed plants. A 75 micron filter bag was installed to catch the airborne kief (crystallized trichomes). There is not much of an avenue for the remaining fiber right now, maybe it could be used as bedding. Hemp currently can't be used as a feed source, and the fiber infrastructure is lagging so there aren't as many options. This will change quickly as the Midwest grows zero acres of cotton and Levis has found a way to make hemp fiber feel like cotton. Wisconsin's rich paper production heritage will transition to hemp for efficiency and environmental benefits. Even our founding fathers wrote the Constitution on hemp paper.”

Hemp flowers and leaves need to be dried to 10% moisture content or lower for safe storage and CBD extraction. “It is important to develop new extraction techniques for organic production. It is a challenge to our developing industry. Some common post extraction purification methods are difficult to be done organically. The organic certification process will help the industry move away from harsh chemicals,” explained Mark.

“There are a lot of moving parts in this business, so we are selling our hemp in different ways. We currently are doing some direct sales to retail stores, mostly the premium hemp flowers cured in our tobacco drying shed. We also sell wholesale biomass to processors that make various CBD products. We eventually want to have our own product line, and our long term strategy is to develop an organic health and education center. Since our daughter Emily is studying to be a naturopathic Doctor, we are looking at creating a clinic and filling it with healthy organic

organic livestock production if removed from the list.

Materials to be relisted on §205.605 for use as ingredients in or on processed products in the “organic” or “made with organic” categories include: Attapulgate, Bentonite, Diatomaceous earth, Nitrogen, Sodium carbonate, Acidified sodium chlorite, Carbon dioxide, Magnesium chloride, and Sodium phosphates.

Casings and Pectin will be relisted on §205.606, nonorganically produced agricultural products allowed as ingredients in or on processed organic products. Konjac flour is proposed for removal from §205.606.

Please remember that any removals from the National List would be addressed in a separate notice and comment rulemaking. AMS plans to take action on these substances before their sunset date of March 15, 2022. While NOSB has recommended four materials for removal from the National List, the NOP will evaluate each of the materials and propose regulation with a request for public comments. Public comments received could redirect the decision, as happened with a few other materials recently -- inulin-oligofructose enriched, Turkish bay leaves, and whey protein concentrate -- which were recommended for removal in 2017, yet during the Sunset Review Final Rule making process the materials were kept on the National List as a result of public comments received. We encourage you to comment when materials are necessary for your organic operation.

As a reminder, the following amendments concerning the following materials will be implemented on December 27, 2019. (As published in the December 27th, 2018 National Organic Program [final rule](#))

- Ivermectin (now prohibited)
- Flavors (organic flavors required when commercially available) *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.*
- Cellulose (only *powdered cellulose* as an anti-caking agent (non-chlorine bleached) and filtering aid. *Microcrystalline cellulose is prohibited.*)
- Glycerin
 - Reclassified as agricultural and added to §205.606, which will now require organic commercial availability searching in order to be approved to use any 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 and added to §205.606, and will now require organic commercial availability searching)

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

National List Proposed Rule

On October 18, 2019, a [proposed rule](#) was published to amend the National List of Allowed and Prohibited Substances (National List) based on public input and the October 2018 recommendations from the National Organic Standards Board. The 60-day comment period closed on December 17, 2019.

- This proposed rule would:
 - Allow blood meal made with sodium citrate to be used as a soil amendment. (This addition begs the question: Are certifiers required to review all anticoagulants in blood meal or similar products? We currently consider slaughter facility processing activities as necessary, and the use of anticoagulants a standard part of the composition of blood meal.)
- Prohibit the use of natamycin in organic crop production.
- Allow tamarind seed gum to be used as a nonorganic ingredient in organic handling when an organic form is not commercially available. ■

options. CBD products are just part of that vision.”

“Farmers need to work with extractors to vertically integrate the supply chain to receive more value from this hemp crop. It is important that we receive a fair price for providing a healthy ‘Farmaceutical’ grade product to the healthcare industry. Organic farmers need the profit to regenerate their soils to continue to provide nutrient dense safe products to the conscious consumer. That is now my definition of an organic farmer- ‘Provide nutrient dense safe products to consumers that want the health benefits of organic agriculture.’”

“One last piece to this puzzle, is before you get started, make sure to get legal advice regarding your contracts. You need to preserve value onto your farm. Start at retail pricing and work backwards and only grow what you can afford to lose monetarily. There is risk in THC testing, weather, drying, storage, transport and getting paid. Insurance is also difficult because it is so new to the industry.” said Mark.

“We also need to do a lot of consumer education. We need to get people over the marijuana propaganda and help them understand the difference in the THC levels, which is only 0.3% in hemp. The medical and scientific research communities need to step up too. There are 190+ cannabinoids in hemp, and we don’t know what they all do, or if CBD is even the best one for your health. Full spectrum products are probably the best. A lot of research is still needed. It’s exciting times for organic farmers. Farmers are providing medical solutions to the public-this crop has to be organic,” emphasized Mark.

“It’s a blessing for farmers to have a profitable crop for them and one that is good for our consumer’s health, and isn’t that why we are organic?” ■

helpful attention to enthusiasm for our work and values, shown in the passion in other members of our review team, or the skilled encouragement from her certification team leader. I was reminded that moving forward takes a community and sometimes a nudge.

In September in Baltimore, we both got a good dose of optimism at the Organic Trade Association’s Leadership Awards Celebration. Israel Morales Sr., OTA’s Farmer of the Year, stressed organic’s importance toward the next generation. “We have to do organic for the future, and we have to do it for the kids.” His two sons, one grandson and two great-granddaughters looked on. Nate Powell-Palm, honored with the Rising Star Award, said “How exciting is it that as young people we can make a living in agriculture again and stay in our home communities... and make our dreams of stewarding the land a reality.” And, Lynn Coody was honored with the Growing the Organic Community Award. An inspiring organic community leader since the 1970’s, Lynn helped pass Oregon’s Organic Food Law in the late 1980s and gave technical advice as the Organic Foods Production Act was written. And, she’s attended most if not all of the 56 NOSB meetings, usually taking copious meeting notes from the front row.

Lynn said “When people ask me what I do, telling them I’m a food analyst for the organic trade leaves them perplexed. I should tell them my job is making my own dreams come true because, over my 45 years of work in the organic community, that’s what I have been doing. My dream was oh so simple...to reform the American food production system so that it would be based on the principles of the natural world and so it would provide real support for farmers... It definitely required dedication and persistence, and as soon as I saw that a project was on a firm footing, I looked for ways to make myself obsolete, in order to take the next step towards my next big dream. The joy of this path has been working with the creative and innovative environments with incredibly thoughtful and dynamic colleagues. The organic trade has come a long way, but there... are still many opportunities for each of us to make our organic dreams come true.

We still have chances to sort out some big topics that have lingered without resolution for decades. We still have opportunities to address issues related to the growth and evolution of the organic trade. We have opportunities to tout the environmental and societal benefits of organic systems; a message that is much needed as we suffer the impacts of climate change. We still have opportunities to improve a critical piece of organic infrastructure, the NOP’s accreditation system—which has been largely unexamined but a powerful tool for fostering fairness, promoting transparency, reinforcing excellence, and repairing the public-private partnership at the core of our relationship with the NOP. There is still a lot to do, and I hope all of you will continue to dream on and dream big.” ■



Lynn Coody - dream big
(photo credit: organicmattersblog.com)

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