



the ORGANIC Cultivator

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On Becoming an Organic Farm Inspector

by Rebecca Anderson, Inspection Manager

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FROM THE DIRECTOR

Cori Skolaski, Executive Director

As I write this article in early February, it does not feel like winter in southwest Wisconsin - it's 50 degrees and raining. For much of the country, with another El Nino upon us, there has recently been a lot of weather drama. As farmers grapple with floods, droughts, heat stress, and wildfires, and agriculture becomes even less predictable in the face of a changing climate, organic agriculture offers a holistic approach to farming that helps mitigate the impacts of these extreme weather events while promoting environmental sustainability and resilience. I'm so glad you're building healthy soil, creating diverse ecosystems, and creating sustainable practices so your farmland can adapt to changing weather patterns and mitigate the impacts of extreme events.

see DIRECTOR on page 7

Have you ever wondered about becoming an organic farm inspector? It's a life as glamorous as it sounds: set your own schedule, decide your workload, gain work/life balance. Tell me more you say?

Contract inspection work is great for those with farming, food safety and other regulatory compliance experience. Organic operations continue to increase each year and so does the need for inspectors.

The work includes reviewing fields, livestock, records, inputs and auditing sales and production records. Inspectors write a report of their on-site observations that allows MOSA reviewers to make informed decisions about granting certification. (Inspectors do not make certification decisions).



There is training involved and MOSA requires International Organic Inspectors Association (IOIA) training or previous experience in organic inspecting for all contract inspectors. IOIA offers three basic training programs:

- Basic Crop Inspection (this is the place to start the journey)
- Basic Livestock Inspection

see INSPECTOR on page 2

- Basic Processing Inspection

Each program is offered as a stand alone training, often as a four or five day online course. Details about the requirements, courses and fees are available at www.ioia.net/training-institute.

Yes, fees apply so please read through the IOIA training page and decide if making this self-investment is right for you.

The Organic Integrity Learning Center offers free training sessions and you'll find a link at the end of this story. These sessions do not replace IOIA training but can give you a sense of what it's like to work in the regulatory world.

Once you get your training there is a brief apprenticeship with a mentor. IOIA and MOSA can assist with finding a mentor who is an experienced inspector willing to help new inspectors get a good start.

It's been six years since I took the IOIA crop training course and in the interim I've done around 70 inspections each year between April and November. Each inspection is different but the process is the same so inspections provide a steady mix of familiarity with very different operations.

A typical day in the life of an inspector involves reviewing the producer's Organic System Plan (OSP) for changes. Then looking at the field plan, inputs or ingredients if it's a handler inspection, followed by a tour around the fields or the facility to verify that the OSP reflects practices in place. During the tour inspectors also observe the health of the crop and soil, livestock, and biodiversity on the farm to name a few things. The field walk is one of my favorite parts of inspection because aside from matching up the OSP with what you see on the ground, it's a chance to listen to the producer describe their approach to growing organic crops. My favorite quote from a grower was him describing how he used companion planting to combat pests. He called it "chemical warfare with plants."

April is the month you pack all of your gear for inspection, if you base your life in Wisconsin anyway. On one April day I left for inspections and it was 70 degrees so I drove with my sunroof open. The next day it was 34 degrees (but sunny) and the roof would not close. I drove home with the roof open, a winter hat on and a blanket on my lap.

May brings whatever mother nature can imagine. One year it rained so much that many crop inspections included a rewrite of the field plan. There are often themes to a growing year and that year it was "couldn't get in the fields til June so planted soybeans instead."

Along the way I spent time in small towns across Wisconsin, Iowa and Illinois—towns I'd never have visited were it not for an inspection. Even better I got to meet the producers who work 365 days/year because they believe in growing a crop and building the soil at the same time.

The goals of growing organic and ensuring organic integrity (through the inspection process) intersect at the farm inspection, often at the kitchen table with a dog or two nearby and maybe a curious kid looking on.

Like farming, inspection life is challenging, but it does make me feel good about going to work. The industry need for more inspectors is very strong. MOSA currently has opportunities for staff inspectors and contract inspectors, especially those with livestock experience. Visit our new [Join Us - Inspectors](#) webpage for more information..

As always, thanks for your interest in organics.

-Rebecca Anderson (randerson@mosaorganic.org)

Links:

[Mosa Inspector Brochure](#) (pdf) for more details on skills needed and an FAQ
[Organic Integrity Learning Center](#) (to sign up for an account to take classes)
[International Organic Inspectors Association](#) (for information on upcoming trainings)
[Join Us - Inspectors](#) (for more information and current MOSA opportunities)

What is the “Annual Update” OR How do I re-apply for continued organic certification? **Frequently Asked Questions Series**

Q. Do I need to re-apply for organic certification each year?

A. Yes! Even though your organic certification does not expire, you must reapply each year for certification.

Q. Wait—do I need to fill out that big application again, each year?!

A. No! For currently-certified clients, MOSA offers a short application form called the Annual Update. It has many sections filled in already and mainly focuses on any changes to your organic operation and on your organic product sales during the previous year.

Q. When is the renewal application due?

A. Submit your completed Annual Update form, certification fee (full or first quarter if paying quarterly), and any necessary supplemental application forms by April 1. Submitting your forms and fee after April 1 will delay the recertification process for your operation and result in late fees.

Q. What sort of changes do I include in my Annual Update form?

A. The Annual Update form has specific questions for you to answer about changes that affect your organic certification. For a producer (farmer), these include areas such as new agricultural products, new scopes (i.e. livestock, greenhouse, etc.), new land, or new inputs. For a handler or processor, the form asks about new products, labels, facilities, production lines, and inputs. The sooner MOSA knows about important changes to your organic operation the sooner we can work together to include these in your organic certification.

Q. What other forms do I complete for my renewal application?

A. For a farmer, please complete the Crop Summary/Current Year Field Plan and, if you'll plant seeds or planting stock this year, the Seed Table. Other forms may be needed if you have changes to your operation, such as field maps, a Prior Land Use Declaration, or a new Organic System Plan. For a handler-processor, please complete the specific forms needed for any changes to your operation: Input Inventory, Product Profile, Organic Ingredients chart, etc.

Q. What is the fee to re-apply for certification?

A. For renewal certification, the fee due with your application is based on your organic sales the previous year. First complete the Sales Information section of your Annual Update to total your organic sales from the previous year. Then use the Fee Schedule that applies to your operation (Producers or Handlers) and plug in your sales figure into the chart on page one to determine your certification fee for the current year. Follow the instructions on pages 2-5 and, of course, contact MOSA with any questions.

Q. Does the application fee cover all my costs for the year?

A. The application fee includes a deposit toward your annual organic inspection (\$350 for producers, \$450 for handlers). If the actual cost of the inspection is greater than the deposit (which is likely, in most cases), MOSA will bill you after we receive the inspector's invoice. Other costs may apply to your operation and are detailed on the Fee Schedule, including the late fee, inspection cancellation fee, rush additional inspection, and missed certification deadline fee.

Q. Does MOSA offer any discounts?

A. Yes! The Early Bird Discount is worth \$50 if you submit your renewal application forms and full annual fee by February 15, and \$25 if you submit your renewal forms and pay your first quarter fee (if paying quarterly) by February 15. The New Client Referral Discount awards a \$50 credit to a current client who refers a new client to MOSA, and the New Client Discount awards the applicant a \$50 discount if referred by a current MOSA client.

Q. How do I complete and submit the Annual Update form?

A. MOSA offers two ways to complete your Annual Update form (and any applicable supplemental forms) and pay your annual fee: paper or electronically. For paper applications, mail your forms and fee to MOSA (PO Box 821) or hand-deliver to the MOSA office (122 W Jefferson St; secure dropbox available). For electronic submissions, please login to your account MyMOSA.org (contact us first if you've never done this) and follow the instructions to submit your application. New in 2024, you may submit your Annual Update via fax or email; please contact us afterward to assure we received it in an acceptable format.

Q. What if I have questions or need help with my application?

A. Call or email MOSA! We have Client Relations staff available weekdays, 8:30-4:30 (Central), to answer questions or even set up a longer meeting time. Email: mosa@mosaorganic.org Phone: 844-637-2526.

CERTIFICATION POLICY UPDATE

by Jackie DeMinter, Certification Policy Manager

Organic Livestock and Poultry Standards Published

The organic livestock and poultry production requirements have been updated with specific regulations regarding indoor and outdoor space for avian species, animal health care practices, confinement, transportation, euthanasia, and slaughter. Though most of the rules are in line with existing MOSA policy, some are new and some new types of records are required. **This article covers the main areas requiring additional information and where there will be new compliance requirements to meet.**

MOSA will be sending you the updated National Organic Standards soon. When you get them, please read through the updated Livestock section (205.238 - 205.242). This rule updated the mammalian and non-avian standards (205.239), introduced a new avian standards section (205.241), and added a transportation and slaughter section (205.242). We have updated our OSPs to incorporate the National Organic Standard updates and will be collecting new information from many livestock and livestock handling operations to verify compliance. **Please review your Livestock OSP and ensure all applicable questions are answered.** Our reviewers and inspectors will be assessing the new information this season. We will also be introducing a Poultry OSP, geared for poultry operations with only outdoor access and no other organic crop or livestock production.

This rule is to be fully implemented by January 2, 2025 for all operations, with a few exceptions:

1. Layer (and pullet) operations certified before January 2, 2025 must comply by January 2, 2029 with outdoor stocking density and soil and vegetation requirements.
2. Broiler operations certified before January 2, 2025 must comply by January 2, 2029 with indoor and outdoor stocking density and soil and vegetation requirements.
3. All poultry operations certified before January 2, 2025 must comply by January 2, 2029 with exit area requirements.

New Metrics for Avian Living Conditions:

- Birds must be provided with year round living conditions that accommodate their natural behaviors including access to the outdoors, shade, shelter, exercise areas, fresh air, direct sunlight, clean water, materials for dust bathing and adequate outside space. Indoors must be sufficiently spacious to allow all birds to move freely, stretch both wings simultaneously, stand normally and engage in natural behaviors.. Continuous total confinement of poultry indoors is prohibited, though temporary confinement for allowed reasons will continue to be allowed.
- Chickens must meet indoor and outdoor stocking densities. Stocking density can be calculated two ways for compliance verification. Sq ft/bird or lbs of bird/sq ft.

Indoors for chickens:

- Indoors for layers =
 - Mobile housing = 4.5 lbs/sq ft or 1.5 sq ft/bird
 - Aviary housing = 4.5 lbs/sq ft or 1.5 sq ft/bird
 - Slatted/mesh floor = 3.75 lbs/sq ft or 1.8 sq ft/bird
 - Floor litter housing = 3 lbs/sq ft or 2.2 sq ft/bird
 - Other housing = 2.25 lbs/sq ft or 3 sq ft/bird
- Indoors for pullets = 3 lbs/sq ft or 1.7 sq ft/bird
- Indoors for broilers = 5 lbs/sq ft or 2 sq ft/bird

Outdoors for chickens:

- Outdoors for layers = 2.25 lbs/sq ft or 3 sq ft/bird
- Outdoors for pullets = 3 lbs/sq ft or 1.7 sq ft/bird
- Outdoors for broilers = 5 lbs/sq ft or 2 sq ft/bird

Other Metrics and Monitoring Practices:

- **Perch Space:** Layers must have at least six inches of perch space per bird and all layers must be able to perch

New Certification Documents Binder Available

Keeping and organizing your certification documents, records, receipts, and letters can be made a little easier with the MOSA Certification Documents Binder. If you still keep your records in paper form, and are looking for a simple solution to keep things organized, contact MOSA for your free binder.

1-844-637-2526

at the same time, except in aviary housing where 55% of the birds must be able to perch at the same time. The alighting rail in front of next boxes may be included; floors in slatted/mesh flooring housing may not be included.

- **Dust Bathing and Scratching areas:** Dust bathing areas must be made available. Non-mobile housing with slatted/mesh floors must have at least 15% solid floor area for dust bathing without crowding.
- **Artificial Light:** May be provided to prolong the day length to provide up to 16 hours of continuous light per 24-hour period; 8 hrs of continuous darkness in a 24 hour period is required. Light intensity should be lowered gradually, and artificial light spectrum may not be manipulated to increase feed intake and growth rate.
- **Soil and Vegetation:** 75% of the outdoor space must be soil, and vegetation must be maintained as appropriate.
- **Ammonia Monitoring:** Weekly monitoring is required, with testing conducted at the birds' head height. Levels over 20ppm must be mitigated and levels must not exceed 25ppm.
- **Exit Areas:** 1 linear foot of exit area (i.e. door width) for every 360 birds, measured across the base of the exit; no less than one exit for flocks less than 360 birds. Alternative plans may be allowed by MOSA which provide less than this required metric, if the plan is described in the OSP and demonstrates ready access to the outdoors is provided to all birds.
- **Induced Molting is prohibited.** In other words, the only molt that a flock can do must be a natural process.

Temporary confinement may be allowed when:

- Temperature: Below 32 or above 90.
- Age: broilers = up to 4 weeks; Pullets = 16 weeks; all other birds may be temporarily confined until they are fully feathered.
- Conditions where bird safety, health or well-being could be jeopardized.
- Risk to soil or water quality.
- Healthcare.
- Sorting/shipping.
- Nest box training for no longer than required for birds to establish the proper behavior, must not exceed 5 weeks total.
- For youth events (such as 4H, FFA) 1 week prior and 24 hours after the event.

For all livestock:

- Provide a full description in the OSP explaining how you monitor, treat, and mitigate lameness.
- Group housing is required for hogs, except farrowing/suckling sows, boars, and hogs with *multiple documented* instances of aggression or for recovery from an illness.
- Have records for all physical alterations and, specifically for pigs, if needle teeth clipping or tail docking is used, records must show that alternative methods to prevent harm failed. Update OSP with information about these alterations.
- Be sure to record the disposition of milk and meat during withdrawal periods if restricted inputs with a withdrawal period are used.
- Over a 24 hour period, shelter must provide sufficient space to lie down, turn around, stand up, fully stretch, and express normal behavior. For group housed cattle, bedded packs, compost packs, tie-stalls, free-stalls and stanchion barns are all acceptable as part of the overall OSP, however no animals may be housed for the entire day in a confined way.
- If you transport animals for any reason, provide information on the length of transportation and emergency measures you would have in place in case of an emergency, such as a vehicle breakdown or significant detour.
- All certified operations must have a written plan in your OSP for prompt, humane euthanasia for sick or injured livestock suffering from irreversible disease or injury, including practices to ensure animals are dead. Note that some forms of euthanizing animals are prohibited.
- When outdoors includes soil, vegetation must be maintained as appropriate for the area and species of livestock.
- Specifically for operations slaughtering livestock, have records showing FSIS/PPIA compliance verification and new verification requirements for PPIA exempt facilities.

CLASSIFIEDS

LIVESTOCK

EIGHT SPRINGING HOLSTEIN HEIFERS

Due April through July. Bred AI to calving ease bulls. Organic slaughter eligible. Located in Kieler WI, call 608-732-7618.

LOOKING TO PURCHASE ORGANIC BEEF CALVES

We sell beef direct to consumers and we need more calves to finish out. Calves 9-24 months of age. Please contact: Jeff Shefchick, 920-265-0406.

DOWNSIZING HERD OF ORGANIC GRASS-FED BLACK & RED ANGUS

Herd of about 100 comprised of roughly 50 broodstock. The herd currently has cow/calf pairs, bred heifers, weaned feeders, and bulls. Located near Cabery, IL. Email for interest – Cole.Allen@grassfedvalley.com.

LAND/FARMS

LAND FOR LEASE AT SILVERWOOD PARK

The Friends of Silverwood Park has uncertified but functionally organic land (1-2 acres parcels) for produce or flower production for lease in Edgerton, WI. For more information, see <https://www.silverwoodpark.org/cultivation/grower-partners> or email grower-satsilverwood771@gmail.com.

EQUIPMENT

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.

Thermal Weed Control Systems

6 row 30" flame cultivator for

sale. (2) burners on each row, with mounted LP tank and electronic solenoid valve. \$2,500. Dan 608-792-2952.

EMPLOYMENT

ORGANIC FARM MANAGER - NEW ALBANY, OHIO

New Albany Organics, a 12-acre certified organic produce farm with 8 high tunnels in New Albany, Ohio seeks to hire an Organic Farm Manager. 3-5 years in organic farming preferred. Salary commensurate with experience. Benefits: Health insurance, Paid time off, 401K. Schedule: Monday - Friday with some weekend hours required. Verifiable references needed. Bilingual speaking skills a plus. Apply in confidence and send resumes to: Newalbanyorganics@newalbanyorganics.net

ORGANIC DAIRY FARMER - WI

Looking for an organic dairy farmer who is ready for retirement and is interested in a mentor/mentee relationship with the goal of transitioning ownership of the farm after a couple years. Preferably in southern Wisconsin. 608-832-1564. If no answer, leave a voice-mail.

FORAGES/GRAIN

CERTIFIED ORGANIC

ALFALFA HAY FOR SALE

3x3x8 Dry Square Bales, Stored Inside or Covered. RFV Ranging 120-210. First, Second & Third Cuttings Available. Approximately 30 different lots all tested by Dairy Land Laboratories and Certified Organic Verification by WFCFO. Located in Strasburg, ND 58573. Contact John Krumm 701-851-0327 or Derrik Krumm 701-851-0195.

LOOKING FOR TRANSITION BARLEY IN SE MINNESOTA (LAKE CITY AREA)

Contact (320) 309-6632.

CUSTOM ROASTING OF SOYBEANS

Golden Grains in Sparta, WI. Call 608-269-5150.

ALFALFA AND ALFALFA/GRASS HAY

Certified organic. 3x3x8 large

square bales. Test results available. Reasonably priced. Located by Linton, ND. Shipping available. Dave Silbernagel 208-867-9939 or dsilbernagel1960@gmail.com.

COMMERCIAL

MEAT PROCESSING AND MEAT SLAUGHTER

Integrity Meats does it all, from slaughter, to cutting, and packaging. Will cure and smoke, vacuum seal, etc. Call Sandy 608-572-4303. USDA Inspected. Integrity Meats, N3825 County Road P, Elroy, WI 53929.

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PREMIER LIVESTOCK & AUCTIONS- NOW CERTIFIED ORGANIC!

Premier Livestock & Auctions is now the only certified organic livestock auction barn in the Midwest. Sell your certified organic cattle and feed. N13538 State Highway 73, Withee, WI 54498. 715-229-2500.

LOOKING FOR ORGANIC GRASS HAY

Tom Fisher 217-695-6770, Coatsburg IL.

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

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

In early January, MOSA clients received their annual paperwork. You probably noticed that we have increased our fees this year. This was not something that we did without a lot of thought and discussion; we know how this impacts our clients. This has been just the second fee increase since 2018, and in that time, all aspects of the certification and inspection process have increased in complexity and cost, largely due to the USDA NOP Strengthening Organic Enforcement (SOE) rule, and their ongoing efforts to protect organic integrity. We fully support these requirements as they will help protect the integrity of, and boost consumer confidence in, the Organic Seal by preventing fraud and requiring more operations to get certified. However, SOE has substantially increased staff and inspector time, training requirements, and expenses. We have been tracking the cost of certification for all clients, scopes, and tiers for several years, and instead of raising fees by a straight percentage, we strived to balance the fairness of fees for everyone. With this balancing, some fee tiers and scopes have increased more than others. In addition, with historically low unemployment rates in the US, increased job responsibilities, and rising cost of living, staff salary requirements have increased. And, of course, our day-to-day expenses like postage, printing, supplies, utilities, etc. have all gone up. All this to say, we're all feeling that economic pinch.

Please remember, too, that Organic Certification Cost Share is available to offset some of your fees - up to 75% of the costs up to \$750 per scope! If you haven't taken advantage of Cost Share in the past, I urge you to look into it. Please contact us if you need assistance.

I encourage you to read through this newsletter; there are some updates you should know about and some interesting articles. As always, if you have any questions or comments about anything in this newsletter or about MOSA please feel free to contact me at Cori@MosaOrganic.org or 844-637-2526. Thank you for reading, and thanks for your continued commitment to organic integrity. ■

cont. POLICY from pg. 5

More information can be found on the NOP's website: <https://www.ams.usda.gov/rules-regulations/organic-live-stock-and-poultry-standards>

Contact us with any questions pertaining to the compliance of your operation.

Strengthening Organic Enforcement

The compliance date of March 19, 2024 is right around the corner. Are you ready? Have you assessed your supply chain to ensure that all operations that need to be certified will be certified by the compliance date? **Avoid supply chain upsets by making sure you have an organic certificate from all suppliers that need to be certified.** MOSA is actively working toward full compliance as well. A few things to take specific note of:

- **MOSA will soon be printing your organic certificate from the Integrity database.** It will look a little different, but the information will be pretty much the same as it has always been.
- **If you submitted your Fraud Prevention Plan (FPP) already, thank you!** We will let you know if we have questions. If you have not yet submitted a FPP, submit it right away as we will otherwise be asking you to submit it as a pre-decision requirement at final review along with any other updates needed to assess compliance with the new regulations. **Not getting your FPP submitted may delay us getting you your updated certificate.**
- **Do you use nonretail containers to ship or store certified organic products?** Nonretail containers moving through the supply chain must display identification of the product as organic along with the production lot number. Furthermore, audit trail documentation for nonretail containers must identify the last certified operation that handled the agricultural product. The only nonretail containers that are exempt are those that are used to ship or store retail labeled products with visible organic identification. Be sure that your updates are submitted, approved and you have a plan for use prior to March 19, 2024.
- **Exempt handlers will need to complete MOSA's new Exempt Handler Affidavit.** Exempt operations that must complete this form may include handlers that are supplying organic product to you or those that you use in your own supply chain. All organic products must be traceable back to the last certified handler, which may be through several uncertified handlers. It will be your responsibility to provide the documentation through all uncertified handlers in your supply chain.
- If you import organic products, import certificates issued out of the Integrity Database will be required as part of your documentation.

More information about the new strengthening organic enforcement regulation can be found on the MOSA website here: <https://mosaorganic.org/strengthening-organic-enforcement>. ■

MOSA

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