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FROM THE DIRECTOR

Cori Skolaski, Executive Director

Hello, and cheers to 2019! Wishing you a happy, healthy, and safe year.

MOSA's annual paperwork update was sent to all clients in early January. The due date is April 1..

In the next few weeks, clients will receive MOSA's newly updated Program Manual and copies of your Organic System Plan(s). Clients who do not update their forms electronically through MyMOSA will receive paper copies; e-clients (those that update through MyMOSA) will receive their documents via email. The Program Manual explains MOSA's programs, certification process,

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the ORGANIC Cultivator

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Old Bakery Beer Company Craft Beer Goes Organic

Joe Pedretti, Outreach Manager

"I have always been into beer," noted James Rogalsky, Brewmaster for the Old Bakery Beer Company. "My mother-in-law bought a kit for my 21st birthday. The more I got into it, the more interested I got."

"Beer is a pretty simple process, but it can also be pretty complicated. I had a sociology degree and I didn't know what I would do with it, so I decided to take the Craft Brewing Science and Engineering Course through The American Brewers Guild in 2012." He had already been working as a bartender at Urban Chestnut Brewing in St. Louis when he started the program. Soon after he started, they moved him into the brewery. His wife (married since 2011), Lauren Pattan was also working as a bartender at



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UCBC, then got a promotion to become the GM. She was important in opening up their second facility - experience that proved vital to starting up their own brewery. "After about 2 years there, I decided to do my own thing and left in November 2013."

"My Dad and I had been talking about opening a brewery and we started putting together a plan, but we couldn't find anything suitable in St. Louis. Everything was either too expensive or too small for our plans. Then my Dad found 'The Old Bakery Building' in Alton, which is about 30 minutes north of St. Louis. We were blown away by the character of the building. It was very early 20th century and much bigger than anything in St. Louis. It offered opportunities for expansion," remembered James.

The young couple had grown up in Alton, and still had both sets of family in the area. "It just felt right." added Rogalsky. "To be able to be part of a positive change for the town we grew up in - it registered almost immediately that we could help move Alton forward". Alton, like many Midwestern towns, has been left to rust by industrial sell-offs and closures since the 1970's.

"We did not buy the building. The owner was already in negotiations with another buyer. We talked with him (the potential buyer) , and he bought it knowing he would have an immediate tenant. We started rehabbing the building by March of 2014. That took a lot of work because the building had to be sandblasted to remove old lead paint. It also needed all new electrical, plumbing and HVAC to get it up to code."

"A brewery is a sizable investment. You have to buy a lot of stainless steel to start: brewing vessels, fermenters, tanks, and kegs. It was very expensive. We bought Criveller brewing equipment from Niagara

Falls, NY. They make good mid-grade gear that we could afford. We were brewing by December of 2014."

"We just brewed beer for a month to get ready, all while continuing work on the restaurant part of the business." The Old Bakery Beer Company was always going to be a brewpub. Originally it was going to be small- about 2000-5000 square feet, making 100-200 gallons at a time for the bar, but with 18,000 square feet we could supply the restaurant and distribute beer for retail. A brewpub is necessary for quick sales, and the margin is significantly higher. A pint costs us \$.25-\$.45 to make. If we sell it as a 5-gallon keg (our highest margin wholesale format), we make \$1.40-1.60 per pint. At the bar, we make \$5.00 per pint. There is a lot more overhead with a pub, but the margin is much better. We built a 200 seat restaurant with a 2000 square foot private event space," said James.

"When we first opened, we only sold draft at the restaurant, but by April 2015 we started retail distribution of kegs, and by March of 2016 we were canning beer by



using a mobile canning company from Chicago. They came once a month, canned our beer, then packed everything up and left again. This worked well at first, since we couldn't afford the canning equipment, but by February of 2018 we bought our own canning equipment, so we can now can whenever we want. Our beer is sold through our existing distributors in Missouri and Illinois. We had a part time sales rep, that we promoted to full time to sell the cans, but we are still working on an overall marketing plan - something that continues to be hard. We don't have a Marketing background, so we're learning as we go."

"Right now we have seven beers in cans, and 17 different beers on tap. Since we opened, we've brewed probably 70 different beers. All of them are certified organic. In 2019 we are planning on making 18 different beers. Our best seller is our Citrus Wheat, which is a mashup

of an American Wheat and a Belgian Wit. We added lemon peel, orange peel, coriander, and chamomile. It's made with certified organic soft red winter wheat from a farmer in central Illinois. It is one third of our total sales."



"The craft beer market has really changed since we opened. After years of 15% growth, in 2017 that growth slowed significantly, and there are still new breweries opening. There is increasing supply, slowing demand and lots of competition. We have sold 1500 barrels each of the past two years. We make 15 barrels at a time two times a week on average. We sell about one third of our production on site, we sell another third in St. Louis, and the final third in Illinois. Distributors are getting picky, but we are reaching out to new areas and trying to make the most out of our existing distributors. There is only so much time in a day, and more sales force is needed for expansion. There are 6500 craft breweries in the US now, but only 30-35 are organic. It helps to differentiate us," noted James.

"My wife and I believe in organic. We are long-time supporters of CSAs and farmers markets. We are firm believers in local and organic. We wanted to be organic from the start. Organic is still a niche market in the brewing world, most are out west, in the NE and places like Colorado. We are one of a very small group in the Midwest. We are more concerned with the environmental benefits of organic than it being just the opposite of conventional. We actively work with local organic farmers for our supplies. All of our barley and raw grains come from the midwest. Our hops come from Michigan and from the Northwest. We take a lot of pride in organic, it produces a better, cleaner beer."

For more information about The Old Bakery Beer Company, visit: <http://www.oldbakerybeer.com/>. ■

scopes, and forms. The Manual also provides guidance on how to make your organic certification process as smooth as possible and how to ensure compliance to the National Organic Standards and MOSA's guidelines. We recommend you read it carefully.

The OSP's we are sending are your copies to keep for your records - do not send them back to MOSA. Please review them and notify your inspector of any changes or updates during your annual inspection.

What's new?

- In this newsletter, you can read about MOSA's new organic grass-fed certification for dairy and/or meat. We're very happy to provide this certification.
- There have been some changes to MOSA's 2019 fee schedule: an addition of handler tier levels to include higher income levels up to \$1 billion; the addition of Grass-Fed Certification options for livestock clients; a slight fee increase for contract feed and slaughter facilities; increased fees for expedited service program (available for new clients only); and a change to the inspection fee to make it a base inspection fee.
- New babies for MOSA Certification Specialists! Congratulations to Chuck Anderas and Family; baby Margaret (Maggie) was born on January 14. And congratulations to Ben Caldwell and Family (including Grandpa Robert Caldwell, Certification Customer Service Specialist.) Baby Forrest was born on January 31.
- MOSA is hiring a Certification Specialist. If you or someone you know is interested in a rewarding career with MOSA, visit our website for the job description and application instructions.

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. ■

NEW CERTIFICATION OPTIONS FOR 2019: GRASS-FED MEAT CERTIFICATION AND GRASS-FED DAIRY CERTIFICATION

MOSA is proud to announce two new optional certification services for 2019 - Grass-Fed Meat and Grass-Fed Dairy Certification for ruminant livestock producers. These new Grass-Fed Meat and Dairy standards, which were created in a joint effort by the certification community and Organic Valley, and will be overseen by Organic Plus Trust, are in the last stages of implementation and will be available for the 2019 season through MOSA.

What is Grass-Fed Certification?

It is a verification service that ensures that dairy and/or meat products are produced without any grain inputs, including supplements. Feed must be forage-based only - no grains are allowed. Standards and policies will be available in early 2019.

Who needs Grass-Fed Certification?

Any certified organic producer with a market that requires grass-fed certification, or wants to strengthen their grass-fed claims to their buyers. You will be able to make the "Certified Grass-Fed" claim on your products, you will receive a unique Grass-Fed Certificate, and for a fee, you may use the Grass-Fed Program Seal on your labeled products.

What are the standards for Grass-Fed Certification?

(NOTE: This is a brief synopsis of the draft standards. The final, complete version of the full standards for Grass-Fed Meat and for Grass-Fed Dairy will be available soon)

- Eligibility--Any certified organic ruminant meat animal production operation or certified organic ruminant handling operation, is eligible to apply for certification under this Standard. Operations not previously certified as organic may simultaneously seek certification under this Standard and the National Organic Program.
- Graze all animals throughout the entire grazing season, which shall be not less than 150 days per calendar year. Due to weather, season, and/or climate the grazing season may or may not be continuous; and
- Provide not less than 60 percent of each animal's dry matter intake ("DMI") from grazing, averaged throughout the grazing season.
- A weaned animal's diet shall consist solely of allowed and restricted feedstuffs:
 - Grazed forages comprised of annual and perennial grasses, legumes, forbs, brassicas, and browse; and
 - Grazed vegetative-stage cereal grain plants (corn in a pre-tassel stage, soybeans prior to bloom; small and cereal grains at pre-boot stage); and
 - Harvested forages and harvested vegetative-stage cereal grain crops (corn in a pre-tassel stage, soybeans prior to bloom; small and cereal grains prior to boot stage).
- Allowed but Restricted Grain-Free Feedstuffs
 - A weaned animal's diet may be supplemented when necessary to maintain nutritional stability and optimal rumen welfare with the following plant-based feedstuffs,
 - Stored forage in cube or pellet form with a daily limit of not more than .5% of an animal's body weight; and
 - Certified organic kelp, beet and citrus pulp, certified organic sugar cane in liquid molasses and dry form provided it is strictly limited to supplemental amounts as set forth in this Program's Policy Manual; and
 - Forage grown in fodder sprout systems, provided consumption is limited to 1.75% of an animal's body weight and not more than 20 lbs. per day, and removes sprout roots prior to feeding and is fed solely during the non-grazing season.
- Allowed but Restricted Grain-Free Mineral and Vitamin Nutrients
- A weaned animal's diet may be supplemented

NOW COMES THE WORK, WITH AUDACITY

Stephen Walker, Operations Manager

As of this writing, the government shutdown which started before Christmas has ended, at least for several weeks. Our National Organic Program staff were forbidden to do their important work for over a month. At MOSA, our doors were open, but we had no place to refer tough regulatory questions, nor complaints about compliance, and we wondered about progress on Farm Bill requirements and backlogged work. We were concerned about struggling farmers losing markets while awaiting NOP certification reinstatement decisions. We were concerned for our NOP colleagues also missing paychecks. Meanwhile, Farm Service Agency office closures stopped needed farmer benefits. The shutdown hurt many folks who were already struggling.

The shutdown also cancelled NOP certifier trainings in late January in South Carolina and early February in Nuremberg, Germany. However, certification work continued, including inspections, investigations, certification decisions, planning for 2019, and answering many hundreds of phone calls each week. The day after I write this, I am headed through a blizzard toward that same South Carolina certifier training, now with three days planned and presented by our Accredited Certifiers Association colleagues, with the appropriate theme “Minding the Store.” We’ll share perspectives, and discuss many aspects of our work, including supply chain verification, cross checks, fraud detection and enforcement, imports and export requirements, Organic Livestock and Poultry Production best practices, verifying dry matter from pasture, crop rotation, organic seed search requirements, and materials review practices. We’ll also learn about new opportunities and challenges in organic hemp production. And we’ll talk about best practices for determining our best practices - how we find agreement on standards interpretation that meets these times and envisions the future. MOSA’s Jackie DeMinter and Kristen Adams are among certifiers presenting, giving back, working together with others for a cohesive and continuously improving certification community.

Now after the holidays and shutdown, here in late winter comes the work, with new vision. Today I heard some fitting words from Howard Thurman, a theologian, educator, and civil rights leader. It’s called “The Work of Christmas.”

*When the song of the angels is stilled,
when the star in the sky is gone,
when the kings and princes are home,
when the shepherds are back with their flocks,
the work of Christmas begins:
to find the lost,
to heal the broken,
to feed the hungry,
to release the prisoner,
to rebuild the nations,
to bring peace among the people,
to make music in the heart.*

Now comes the work, from gratitude, which feeds optimism. We have reasons for optimism even after struggles in 2018. For one, [A recent report from Nielsen](#) shows continued increase in organic sales. Organic is mainstream, and, millennials spend 13.8% more on organic products than other consumer groups. Top organic categories include milk, salads, eggs and bars. Data shows organic food sales rose nearly 9% over the previous annual period.

Farm Bill

We also left 2018 with wins in the new Farm Bill. Organic certification cost-share funding continues. This is especially important for smaller organic operations, as oversight requirements and certification costs increase. The Bill also includes significant Organic Agriculture Research and Extension Initiative (OREI) funding, with that expected to continue past 2023. OREI helps farmers become more productive and profitable, and develops new agricultural practices valuable to both organic and conventional agriculture. The Bill also expands organic import enforcement, to deter fraud. It also provides \$5 million for collection of organic data used by policymakers and others. Good data assists markets, risk management, trend tracking, and fraud prevention.

However, the Farm Bill also contains very concerning provisions that change the National Organic Standards Board (NOSB). MOSA had submitted comments in opposition to these changes. The farmer seat on the NOSB now may be filled by farm company employees. This could favor corporate organic interests over the important voice of the independent organic farmers. A second provision affects NOSB voting procedures, and makes it more difficult for synthetic materials to sunset from the National List.

CERTIFICATION POLICY UPDATE

by Jackie DeMinter, Certification Policy Manager

National Organic Program Update: National List Changes

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

The final rule will be effective **January 28, 2019**, except for amendments concerning Ivermectin (now prohibited), flavors (organic flavors required when commercially available), cellulose (revised annotation specifying types of cellulose permitted), glycerin (reclassified as agricultural), and carnauba wax (reclassified as agricultural)--which will be implemented on **December 27, 2019**.

Each update is explained below along with any actions you can expect will be necessary where applicable. In general, you can expect to update organic system plans and input inventories or ingredient monitoring spreadsheets to align with the new rules, and to provide additional information for review where applicable. We're working on implementation details now but if changes impact you specifically, you will hear from us as your file is reviewed. Certification Specialists and Inspectors will be paying attention to these changes and we'll do our best to address changes that impact you, but please be prepared with any new information that will be required. On our end, we are also being as proactive as we can in verifying products that were previously prohibited, but if you see a material below that used to be prohibited and is now allowed and you want to use it, contact us to add the information to your Input Inventory form, even if you've inquired about it before. Please contact us with any questions about these changes.

Summary of Final Rule Changes

Added to all categories - 205.601(a)(2), 205.603(a), and 205.605(b).

Hypochlorous acid - generated from electrolyzed water.

Added to 205.601(j), Plant or soil amendments

(5) Magnesium oxide (CAS # 1309-48-4)—for use only to control the viscosity of a clay suspension agent for humates.

(10) Squid byproducts—from food waste processing only. Can be pH adjusted with sulfuric, citric, or phosphoric acid. The amount of acid used shall not exceed the minimum needed to lower the pH to 3.5.

Revisions to 205.601(j), Plant or soil amendments

(7) Micronutrients—not to be used as a defoliant, herbicide, or desiccant. Those made from nitrates or chlorides are not allowed. *Micronutrient deficiency must be documented by soil or tissue testing or other documented and verifiable method as approved by the certifying agent.*

Added to 205.602, nonsynthetic substances prohibited in crop production.

(f) Rotenone (CAS # 83-79-4).

Added to 205.603(a) As disinfectants, sanitizer, and medical treatments as applicable.

(6) Activated charcoal (CAS # 7440-44-0)—must be from vegetative sources.

(7) Calcium borogluconate (CAS # 5743-34-0)—for treatment of milk fever only.

(8) Calcium propionate (CAS # 4075-81-4)—for treatment of milk fever only.

(17) Kaolin pectin—for use as an adsorbent, antidiarrheal, and gut protectant.

(20) Mineral oil—for treatment of intestinal compaction, prohibited for use as a dust suppressant.

(21) Nutritive supplements—injectable supplements of trace minerals per paragraph (d)(2) of this section, vitamins per paragraph (d)(3), and electrolytes per paragraph (a)(11), with excipients per paragraph (f), in accordance with FDA and restricted to use by or on the order of a licensed veterinarian.

Revisions to 205.603(a) As disinfectants, sanitizer, and medical treatments as applicable.

(9) Chlorhexidine (CAS # 55-56-1)—*for medical procedures conducted under the supervision of a licensed veterinarian.* Allowed for use as a teat dip when alternative germicidal agents and/or physical barriers have lost their effectiveness.

(23) Parasiticides—prohibited in slaughter stock, allowed in emergency treatment for dairy and breeder stock when organic system plan-approved preventive management does not prevent infestation. In breeder stock, treatment cannot occur during the last third of gestation if the progeny will be sold as organic and must not be used during the lactation period for breeding stock. *Allowed for fiber bearing animals when used a minimum of 36 days prior to harvesting of fleece or wool that is to be sold, labeled, or represented as organic.*

(i) Fenbendazole (CAS #43210-67-9)—milk or milk products from a treated animal cannot be labeled as provided for in subpart D of this part for: *2 days following treatment of cattle; 36 days following treatment of goats, sheep, and other dairy species.*

(ii) Moxidectin (CAS #113507-06-5)—milk or milk products from a treated animal cannot be labeled as provided for in subpart D of this part for: *2 days following treatment of cattle; 36 days following treatment of goats, sheep, and other dairy species.*

Which goes along with the practice standard change to **Livestock Health Practice Standard §205.238(b)(2)** which has been amended by replacing the 90-day withholding time for milk and milk products with a cross-reference to withholding times specified in §205.603. In addition, the term “stock” is replaced with “animal.”

(b) When preventive practices and veterinary biologics are inadequate to prevent sickness, a producer may administer synthetic medications: Provided, That, such medications are allowed under §205.603. Parasiticides allowed under §205.603 may be used on: (1) Breeder stock, when used prior to the last third of gestation but not during lactation for progeny that are to be sold, labeled, or represented as organically produced; and (2) Dairy stock animals, as allowed under §205.603. *a minimum of 90 days prior to the production of milk or milk products that are to be sold, labeled, or represented as organic.* (3) Fiber bearing animals, as allowed under §205.603.

Ivermectin has been removed, effective December 27, 2019 which gives clients almost a year to discontinue use. Ivermectin will maintain the 90-day withhold until then. During the 2019 season we will be verifying and re-approving the parasite prevention and control plans in place on your operation. All input inventories listing ivermectin as an emergency input will need to be updated with replacement products. Any client listing moxidectin or fenbendazole will need to have MOSA approval for use.

(27) Propylene glycol (CAS #57-55-6)—only for treatment of ketosis in ruminants.

(28) Sodium chlorite, acidified—allowed for use on organic livestock as a teat dip treatment only.

(30) Xylazine (CAS #7361-61-7)—federal law restricts this drug to use by or on the lawful written or oral order of a licensed veterinarian, in full compliance with the AMDUCA and [21 CFR part 530](#) of the Food and Drug Administration regulations. Also, for use under [7 CFR part 205](#), the NOP requires: (i) Use by or on the lawful written order of a licensed veterinarian; and, (ii) A meat withdrawal period of at least 8 days after administering to livestock intended for slaughter; and a milk discard period of at least 4 days after administering to dairy animals.

Added to 205.603(b) As topical treatment, external parasiticide or local anesthetic as applicable.

(8) Sodium chlorite, acidified—allowed for use on organic livestock as teat dip treatment only. (Yes, this is being added twice, but as a teat dip only!)

(10) Zinc sulfate—for use in hoof and foot treatments only.

We are actively re-reviewing zinc sulfate hoof-care products that were noted as prohibited in our materials database.

Revisions to 205.603(b) As topical treatment, external parasiticide or local anesthetic as applicable.

(4) Lidocaine—as a local anesthetic. Use requires a withdrawal period of 8 days after administering to livestock intended for slaughter and 6 days after administering to dairy animals.

(7) Procaine—as a local anesthetic. Use requires a withdrawal period of 8 days after administering to livestock intended for slaughter and 6 days after administering to dairy animals.

Revisions to 205.603(d) As feed additives

Our friends at the National Organic Coalition created a key organic priorities [scorecard](#) to compare the final Farm Bill with the House and Senate versions.

Resources for tenuous times

It's still tenuous times in organic. In 2018, we lost over 700 dairy farms in Wisconsin alone; that's over 8%. Rural America is hurting. In mid-January, Robert Leonard, news director KNIA and KRLS radio, Iowa, wrote a [New York Times editorial](#) calling out the one-two punch that tariffs and the shutdown dealt to family farms. *"Normally, January is a special and often joyous month for farmers, as they recover from the hard work of harvest and look to spring and a new planting season. They have sold much of their crops and are paying bills, taking out new operating loans for the coming year and buying seed, fertilizer and more. Not this year... Money isn't moving, and when farmers aren't moving their money, whole towns suffer. Thousands of towns. All across America... Most rural American farms are not big corporate operations. The most recent available farm census data, from 2012, shows that Iowa has nearly 89,000 farms, and 57 percent are small farms under 180 acres... So 'big ag' — the only farmers with the capital to survive over the long term — profits from the blundering crisis. If and when small farmers fail, larger operations can swoop in and buy up the land at fire sale prices."*

We've spoken with many organic family farmers facing crisis. Sometimes, they can't maintain organic certification requirements. For some, unfortunately, we've had to suspend certification. MOSA's Mark Geistlinger recently asked, "How can we best balance our regulatory and client service responsibilities and our empathy?" I think we listen. We approach the standards with practicality. We draw appropriate lines. And we point to resources. Our website includes a good [list of partners and resources](#) for financial assistance, education, market information, regulations and more.

More recently, MOSA staff are particularly attuned to resources regarding stress management on the farm. Mark recently shared information from a Michigan State University Extension webinar: "Managing Stress on the Farm and Communicating with Farmers Under Stress." MSU Extension gathered a lot of their stress management information on a [special website](#). University of Wisconsin Extension also published information on [Farm Stress & Decision Making During Challenging Times](#). The Wisconsin Department of Agriculture, Trade

and Consumer Protection's [Farm Center](#) provides a variety of information and support to farmers and their families, including programs for economic development, mediation and arbitration, outreach, and technical assistance. A Farm Center [presentation on how to identify and address signs of stress during difficult times](#) is available online. Iowa State Extension also compiled [resources to deal with farm stress](#), market stress, youth stress, marriage stress, women's stress, men's stress, and grief. And, MOSA's Ben MacDonald came across a good mental health resource - [mantherapy.org](#) - aimed at men who may be reluctant to seek help, he says, "because you can't just rub some dirt on your emotions." The videos are entertaining and there is a crisis hotline anyone can call. Contact MOSA for further information regarding these resources.

There's got to be a balance of coping and taking action. Our Inspection Coordinator Liz Daines recently passed along a notification that the Wisconsin Farmers Union is building a farmer-led response to the current dairy price crisis. WFU is working on short- and long-term federal and state policy solutions, as well as supporting farmers' engagement in dairy cooperatives and the dairy check-off to find marketplace solutions. At [dairytogether.com](#), there's more information. It's a movement to rebuild a dairy economy for family farmers and rural communities.

Spring NOSB meeting

Yep, there's work to get back to. Already, we're looking ahead to the next National Organic Standards Board Meeting, April 24-26 in Seattle. The [docket](#) for accepting public comments is already open, and a detailed agenda with proposals is expected to be published in mid-March.

The NOSB will review National List materials scheduled to sunset in 2021. Organic stakeholders should give feedback now, regarding materials' necessity or potential alternatives, before NOSB votes this fall.

Crop production materials up for re-review include: Hydrogen peroxide (disinfectant and fungicide); Ammonium soaps (animal repellent); Horticultural oils (pest/disease control); Pheromones (for insect management); Ferric phosphate (slug bait); Potassium bicarbonate (disease control); Magnesium sulfate (fertilizer); Hydrogen chloride (delinting cotton seed); Ash from manure burning (prohibited for use); and Sodium fluoaluminate (also prohibited).

Livestock sunset reviews include: Atropine (medical treatment); Hydrogen peroxide (disinfectant, teat dip); Iodine (disinfectant, teat dip); Magnesium sulfate (medical treatment); Fenbendazole (parasiticide); Moxidectin (parasiticide); Peracetic acid (equipment sanitizer); Xylazine (sedative); Methionine (poultry feed additive); Trace minerals (feed additive); and Vitamins (feed additive).

And, *processing/handling materials* up for discussion include: Alginic acid; Citric acid; Lactic acid; Calcium chloride; Dairy cultures; Enzymes; L-Malic acid; Magnesium sulfate; Microorganisms; Perlite (filtering aid); Potassium iodide; Yeast; Activated charcoal (filtering aid); Ascorbic acid; Calcium citrate; Ferrous sulfate; Hydrogen peroxide (sanitizer); Nutrient vitamins and minerals; Peracetic acid (sanitizer); Potassium citrate; Potassium phosphate; Sodium acid pyrophosphate (leavening agent); Sodium citrate; Tocopherols (antioxidant); Celery powder; Fish oil; Gelatin; Dried Orange pulp; and Pacific kombu seaweed.

For crop production, additional expected agenda topics include: discussions on Marine plants used as crop inputs and a liquid fish production annotation; petitions for Ammonium citrate, Ammonium glycinate, Calcium acetate, Paper pots, and Allyl Isothiocyanate; and, more regarding Protecting the Genetic Integrity of Seed Grown on Organic Land. We also expect discussion regarding allowance of Oxalic Acid in organic apiculture, plus petitions for Silver hydrogen citrate, Pullulan, and Collagen Gel (casing), for allowance in processing/handling. Other topics may include Import Oversight, Excluded Methods Terminology/Determinations, 2020 Research priorities, and Genetic Integrity Transparency.

Necessary audacity

In tenuous times, balancing stress with hopeful optimism takes some audacity. We must be present, open, and active. Gather some education and inspiration at an organic conference; listen, share your story, and build bridges with your neighbor. We're called to follow vision and discern right choices. Work for good with a grateful heart. And, recognize that the good doesn't always appear good at first. My wife's father used to say, "Out of the sh-- rises beautiful flowers." Or, we could say, from the muck springs forth fruit. That's a principle of agricultural stewardship. We regenerate. What falls away sheds new life, as green manure and compost build healthy soil, which makes healthy plants and animals,

healthy people, and healthy communities.

Working toward our vision for a thriving organic world is crucial for the next generation, let alone the next seven. Perhaps our children will lead us.

In January, several [Youth for Climate](#) marches were held in Brussels, Belgium. Inspired by Swedish teenager Greta Thunberg, the marches grew. On January 24th, 35,000 students skipped school to march for the climate. A day later, at the annual meeting of the World Economic Forum in Switzerland, Thunberg made more headlines. [Here are some of her urgent words for world leaders.](#)

Our house is on fire. I am here to say, our house is on fire. According to the [IPCC \(Intergovernmental Panel on Climate Change\)](#), we are less than 12 years away from not being able to undo our mistakes. ...

People like to tell success stories. But, their financial success has come with an unthinkable price tag. And on climate change, we have to acknowledge we have failed. All political movements in their present form have done so, and the media has failed to create broad public awareness.

But Homo sapiens have not yet failed.

Yes, we are failing, but there is still time to turn everything around. We can still fix this. We still have everything in our own hands. But unless we recognise the overall failures of our current systems, we most probably don't stand a chance...

Now is not the time for speaking politely or focusing on what we can or cannot say. Now is the time to speak clearly. Solving the climate crisis is the greatest and most complex challenge that Homo sapiens have ever faced. The main solution, however, is so simple that even a small child can understand it. We have to stop our emissions of greenhouse gases.

Either we do that or we don't. You say nothing in life is black or white. But that is a lie. A very dangerous lie. Either we prevent 1.5C of warming or we don't. Either we avoid setting off that irreversible chain reaction beyond human control or we don't. Either we choose to go on as a civilisation or we don't. That is as black or white as it gets... We all have a choice. We can create transformational action that will safeguard the living conditions for future generations. Or we can continue with our business as usual and fail. That is up to you and me.

Some say we should not engage in activism. Instead we should leave everything to our politicians and just vote for a change instead. But what do we do when there is no political will? What do we do when the politics needed are

by nutrient vitamins and mineral materials provided the material is:

- Required to maintain animal, rumen and nutritional health;
- Free of grains and grain carriers;
- Permitted in organic production
- Comply with all applicable livestock healthcare and living conditions requirements of the National Organic Program;

What will it cost?

This is an optional service with its own certification fee and inspection fee. For current MOSA clients the annual fees are:

Dairy: \$300 Certification Fee plus Actual Inspection Fees

Meat: \$300 Certification Fee plus Actual Inspection Fees

How do I get more information and application materials?

Simply call or email MOSA to request the Grass-Fed Certification application materials, or with your questions about the program. ■

2018
FARM BILL
ORGANIC
SCORECARD

for details on each program
visit: www.NationalOrganicCoalition.org

FINAL 2018 FARM BILL, SIGNED INTO LAW ON
DECEMBER 20, 2018.

| | |
|----------------------------------------------------------|-------------------------------------------------------------------------------------------|
| Organic Import Oversight and Enforcement SCORE: A | Organic Data Initiative SCORE: A |
| Organic Research SCORE: A- | Conservation Program Reforms SCORE: B+ |
| Certification Cost Share Assistance SCORE: B | Regionally Adapted Seeds and Breeds SCORE: B |
| Risk Management Program Reforms SCORE: B | Protecting the Role and Structure of the National Organic Standards Board SCORE: D |

(1) DL-Methionine, DL-Methionine—hydroxy analog, and DL-Methionine—hydroxy analog calcium (CAS #'s 59-51-8, 583-91-5, 4857-44-7, and 922-50-9)—for use only in organic poultry production at the following pounds of synthetic 100 percent methionine per ton of feed in the diet, *maximum rates as averaged per ton of feed over the life of the flock*: Laying chickens—2 pounds; broiler chickens—2.5 pounds; turkeys and all other poultry—3 pounds.

This revision allows for averaging per ton of feed over the life of the flock. MOSA is actively working on new tools for manufacturers and farmers to use for documentation.

Revisions to 205.603(f) Excipients.

(f) Excipients—only for use in the manufacture of drugs and biologics used to treat organic livestock when the excipient is: (1) Identified by the FDA as Generally Recognized As Safe; (2) Approved by the FDA as a food additive; (3) Included in the FDA review and approval of a New Animal Drug Application or New Drug Application; or (4) *Approved by APHIS for use in veterinary biologics.*

Revisions to 205.605(a) Nonsynthetics allowed.

- Remove Alginic from Acid listing (moving to (.605(b))
- Remove Carnauba wax from Wax listing (moving to .606)

Flavors—*nonsynthetic flavors may be used when organic flavors are not commercially available.* All flavors must be derived from *organic* or nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative.

The revision includes an important change to the annotation for natural flavors that will require organic forms when they are commercially available in the appropriate quality, quantity or form. MOSA clients will need to be in compliance by the effective date of December 27, 2019 with appropriate documentation on file for review and audit. MOSA's new Organic Search-Handlers form should be used to document your annual searches for organic flavors.

Added to 205.605(b) Synthetics allowed.

Alginic acid (CAS #9005-32-7)

- Reclassified from (a) to (b).

Potassium lactate—for use as an antimicrobial agent and pH regulator only.

Sodium lactate—for use as an antimicrobial agent and pH regulator only.

Revisions to 205.605(b) Synthetics allowed.

- Remove Glycerin (moving to .606)

Cellulose (CAS #9004-34-6) — for use in regenerative casings, powdered cellulose as an anti-caking agent (non-chlorine bleached) and filtering aid. Microcrystalline cellulose is prohibited.

MOSA clients will need to be in compliance by the effective date of December 27, 2019 with appropriate documentation on file. Only powdered cellulose is allowed as an anti-caking agent and filtering aid and microcrystalline cellulose is now prohibited.

Chlorine materials—disinfecting and sanitizing food contact surfaces, *equipment and facilities may be used up to maximum labeled rates. Chlorine materials in water used in direct crop or food contact are permitted at levels approved by the FDA or EPA for such purpose, provided the use is followed by a rinse with potable water at or below the maximum residual disinfectant limit for the chlorine material under the Safe Drinking Water Act.* Chlorine in water used as an ingredient in organic food handling must not exceed the maximum residual disinfectant limit for the chlorine material under the Safe Drinking Water Act. i. Calcium hypochlorite. ii. Chlorine dioxide. iii. *Hypochlorous acid—generated from electrolyzed water.* iv. Sodium hypochlorite.

Added to 205.606

(a) Carnauba wax

This materials was reclassified from 205.605(a). Effective December 27, 2019, MOSA clients using carnauba

CLASSIFIEDS

LIVESTOCK

ORGANIC DAIRY CATTLE

Going Out of Business! Selling fresh cows monthly. Excellent udder health. 920-650-2976. Jefferson County WI.

CUSTOM HEIFER RAISING

Will custom raise your organic heifers. Feed provided. Call for more details. Located near Lewiston, MN. Call Matt at: 507-459-7719.

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 FARMLAND FOR RENT

Organic Farmland for Rent. 13 acres total. This land is in the Kickapoo Valley of the Driftless region of WI. 1/2 bottomland and 1/2 gently sloping hillside. Very productive soils. For the last three years these fields have been under certified organic management and were not sprayed for many years before that. Soldiers Grove area of SW Wisconsin. Rent negotiable. Call (608)624-5735 or redfieldrh@aol.com

85 ACRE DAIRY FARM

85 acre dairy farm certifiable in Aug 2018
40+acres in wooded pasture
40+acres in 8 paddocks for rotational grazing. 5 bedroom house, Dairy Barn (34ft x 76ft) 2-Story, Machine Shed (48ft x 80ft) Built in 2001, full cement floor, 2-Story Heifer barn (32ft x 52ft), Detached 2-Car Garage (20ft x 32ft), and Smaller storage sheds. Contact chelsey at (608) 485-0139 or chelsey_53805@hotmail.com

ORGANIC FARM

15 m/l acre non-certified, organic method farm. No man made chemicals or pesticides used for over 12 years. 4 acres tillable. 5 paddocks with good fences and gates. 2 ponds. 3bdrm, 2 bath home with 40 x 40 shop, certified kitchen, large barn, chicken house w/ fenced yard, brooder house, 3 greenhouses, loafing shed and pump house. Located in Randolph County, Missouri (north Central MO) call Jodie at

660-676-9138 or Dan at 573-823-5452 for more info and pricing. Advantage Realty - Danjo Farms

CERTIFIED ORGANIC FARM

93 acre, MOSA certified organic farm. 65 acres are tillable, also contains six acres of marketable white oak. Set of buildings including a house, pole buildings and outbuildings. Located in Crawford County, WI (SW WI). Call Rich for pricing and info at 608-485-2756 or 608-624-5220.

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.

COVER CROP SEEDERS

Cover crop seeders - save a trip this fall. Gandy and Valmar models, multiple sizes. Starting at \$2900. Central MN. Call Paul 763-286-2037.

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.

MISCELLANEOUS

ORGANIC MOLASSES

Certified organic molasses. 5 gallon pails. FOB Verona Wisconsin 53593. \$70/pail. Discounts for larger quantities. Pure Sweet Honey Farm 608-845-9601 psh@chorus.net.

GARLIC TINCTURE

Mr.K's garlic tincture & garlic vinegar approved for use as treatment in organic production. Helps with mastitis, scours, etc. 330-674-3999 x3.

SEEDS

COVER CROP SEEDS

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

FORAGES/GRAINS

CERTIFIED ORGANIC SHELL CORN

Air Dried. Jefferson, WI. 262-593-2563.

ORGANIC HAY - SMALL SQUARES

2018 Organic Hay. \$8.00 per small square bale. La Farge, WI. 608-479-1222.

ORGANIC BALEAGE

2018 Organic Baleage. \$115 per round bale. La Farge, WI. 608-479-1222.

ORGANIC HAY

Organic hay with combined total of 1500 bales, in 6x4 round bales. Consisting of 1st, 2nd and 3rd cutting of alfalfa, 1st, 2nd and 3rd cuttings of alfalfa clover and alfalfa wheat hay. Located in Fairfield, IA. Steven at 641-209-2038 or 641-209-2045.

2018 HAY

2018 Certified Organic Hay. 4x5 Round Bales. Grass and Clover Mix. Various Cuttings. Tested. Can Deliver. Wausau Area. Call 715-921-9079.

2018 BALEAGE

MOSA Certified 2018 baleage: 1st, 2nd and 3rd cutting, seed test available. We can deliver. Gleason, WI 715-921-9079.

2018 ORGANIC ALFALFA HAY

MOSA certified 2018 Organic Alfalfa Hay. 3x3x8 large squares of dry hay and 3x3x5.5 large square bales of wrapped baleage. Wonewoc, WI. Transportation available. 608-553-1136.

2018 ORGANIC Wheat or Barley Straw

MOSA certified 2018 Organic Wheat or Barley Straw. 3x3x8 large square bales. Wonewoc, WI. Transportation available. 608-553-1136.

COMMERCIAL

ELECTRIC WEEDER FOR RENT

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

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

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

FEATURED EVENTS

Organic Fruit Growers Association Winter Retreat

February 20 & 21 | \$ | Trempealeau, Wis.

On the two days leading up to the MOSES Conference, the Organic Fruit Growers Association be hosting their annual winter retreat at The Historic Trempealeau Hotel, just thirty minutes north of La Crosse, WI. [Learn more.](#)

MOSES Organic Farming Conference

February 21 -23, 2019 | La Crosse, Wisc..

It's the largest event in the U.S. about organic and sustainable farming, offering 66 workshops over 6 sessions, inspiring keynotes, engaging roundtables, and a resource-packed exhibit hall with over 170 vendors. Please visit the MOSA booth! [Learn more.](#)

Regeneration Midwest Meeting @ The MOSES Organic Farming Conference

February 22, 2019 | 7-8 p.m. | Room F

There will be a Regeneration Midwest Meeting at the 2019 MOSES conference. The meeting will take place on Friday, Feb. 22nd from 7-8pm in room F. You must be registered for the MOSES Conference to attend this meeting.

UW Extension Produce Safety Rule Grower Training Course

February 28 | \$65 | Green Bay, Wis.

This one-day course provides a foundation of good agricultural practices and co-management information, Food Safety Modernization Act (FSMA) Produce Safety Rule requirements, and details for how to develop a farm food safety plan. Includes PSA grower training manual, AFDO certificate of attendance, refreshments, and lunch. Call 608-265-9585 with questions. [Pre-register.](#)

16th Annual Indigenous Farming Conference, Aanji-bimaajitoon

Gidibaajimowininaan, Revitalizing Our Story

February 28 – March 3 | \$ | White Earth Reservation, Callaway, Minn.

Learn about a wide array of topics and discussions such as community land revitalization, food sovereignty initiatives, tribal food and farm policy, Indigenous Seed Keepers Network, native agricultural techniques, tribal college extension programs and much more! [Register.](#)

2019 Indiana Organic Grain Farmer Meeting

March 6 & 7 | \$ | West Lafayette, Ind.

Purdue University Extension has expanded this annual meeting to a two-day conference with additional education and networking for organic grain farmers, ag professionals, and those considering a transition to organic grain. [Learn more.](#)

2019 Midwest Organic Pork Conference

March 8 & 9 | \$ | Waterloo, Iowa

This is the first conference of its kind to bring together a diverse group of expert organic and niche hog farmers, organic researchers, industry experts and others who will share available research, best production practices and technical assistance for organic hog production. [Learn more.](#)

Direct and Wholesale Marketing Success: Techniques for Increasing your Farm Income

March 21 | Free | 8:30a.m. – 4:30 p.m. | Amery, Wis.

Farm Table Foundation, in collaboration with MOSES and Land Stewardship Project, is offering this marketing workshop to help you find the right market outlet to match your skills and personality, land, crop mix, and customers' needs, discuss trends in the food market and the pros and cons of various marketing models including: roadside stands, farmers markets, CSA, agri-tourism, restaurants, pick-your-own, on-line sales, wholesale, retail and brokers, and work in class on designing a mix of markets and crops that work for your farm and market based on customers' needs and your strengths. [Registration required.](#)



NOP has new Associate Deputy Administrator

Dave Glasgow is the new Associate Deputy Administrator for USDA's National Organic Program (NOP). He succeeds Dr. Jennifer Tucker, who previously held that position before moving up to Deputy Administrator of NOP last June. For the past two years, Glasgow had served as public affairs director for USDA's Agricultural Marketing Service. You can find his [LinkedIn profile here.](#)

His LinkedIn summary states:

Proven senior executive with 25 years of experience leading public and private initiatives. Expertise in management, internal and external communications, public and legislative affairs, legal analysis, strategic planning and project management. Trusted adviser to chief executives on diverse policy subject matter including capacity building, partnership building, business and community development, crisis communications, social media, and organizational development. Trusted spokesperson with a seasoned understanding of federal, State and local government and how partnerships support private sector growth. Deep network of personal and professional relationships. ■

wax will need to use organic carnauba wax unless commercially unavailable. MOSA's new Organic Search-Handlers form should be used to document your annual searches for organic carnauba wax.

(h) Glycerin (CAS # 56-81-5)—produced from agricultural source materials and processed using biological or mechanical/physical methods as described under § 205.270(a).

This material was reclassified from 605(b). Effective December 27, 2019, MOSA clients using glycerin will need to use organic glycerin unless commercially unavailable and sourced from agricultural materials and processed using biological or mechanical or physical methods. MOSA's new Organic Search-Handlers form should be used to document your annual searches for organic glycerin.

Revisions to 205.606

(d) Colors - all entries have been revised to remove specific CAS numbers and to add the binomial nomenclature of the agricultural source of the color. The two noted below have additional annotation changes to take note of.

(1) Beet juice extract color—derived from *Beta vulgaris* L., except must not be produced from sugarbeets.

(12) Paprika color—derived from dried powder or vegetable oil extract of *Capsicum annuum* L.

The use of binomial nomenclature in § 205.606(d) clarifies which agricultural sources may be used to derive the color extract. Varieties or cultivars of the same species may be used as sources for a color extract unless otherwise excluded in the annotation. Agricultural sources with the same genus but not the same species will not be eligible for use as a source for a color listed in § 205.606(d).

Other Policy News

Paper Pots Update

We've been talking about paper pots for several months now and are still in limbo waiting for the National Organic Standards Board (NOSB) to make a recommendation. To recap, though certifiers have historically allowed the use of paper pots on organic operations, the National Organic Program (NOP) clarified that paper pots were actually not an approved application of paper, and sent a notice to all certifiers requiring operations to discontinue the use of paper pots after the 2018 season. They further clarified that in order for paper pots to continue to be allowed in the future, a petition to the NOSB would be necessary, and so a petition was submitted and is in the process of being considered. The petition covers all paper pots including those manufactured with additives which are standardly included in the manufacture of paper. At the last NOSB meeting, paper pots were a focus and many comments that were submitted requested withdrawal of the phase-out period--to allow for the continued use of pots while the NOSB work unfolds. As a result, the NOSB passed a resolution to allow for this strongly supported continued use, which the NOP considered and on November 5th sent an update to certifiers allowing for the unrestricted continued use of paper pots. *"The NOP is extending the allowance of paper pots until further notice. Any additional changes to the allowance for the use of paper pots will be communicated to certifiers to provide adequate time to make any adjustments. For fairness and consistency in certification across operations, all certifiers may allow paper pots during this extension period."*

The NOSB will likely have a recommendation at the next NOSB meeting in April and we anticipate that paper pots will be recommended for allowance. We hope to see a *business as usual* decision in the end.

Organic Livestock and Poultry Practices (OLPP) Rule Update - Certifiers have been working tirelessly to determine which new rules and clarifications are easily interpreted within the current regulation, and which would seem to go beyond the current regulation or would be more difficult to implement. In many areas, the new rule simply outlined policies and practices already certifiers already have in place so agreement is not difficult to achieve. Our collective goal is to consistently follow the same interpretation of the standards and the group is nearing completion on a "best practices" document which will aid certifier policy development and consistency in interpretation of the NOS. At MOSA we're beginning to make updates to our internal policies and will be communicating any clarifications applying to your operation during review and inspection this season.

Origin of Livestock (OOL) Rule Clarification Support

MOSA recently signed onto a letter sent to Secretary Perdue by the Accredited Certifiers Association (ACA) to emphasize the importance of consistent enforcement of the organic regulations by certifiers. Quite notable is the inconsistent interpretation certifiers have related to origin of livestock standards. The ACA is requesting clarification related to 205.236 Origin of Livestock. The letter states, *"Accredited certifiers would really like to get on the same page as one another about this. The topic is discussed frequently in various forums, but lack of regulatory clarity coupled with diverging past precedents make it extremely challenging for certifiers to switch course from where they are currently. Although our members do not all agree on the interpretation of this regulation as it is currently written, we are in strong agreement that once regulatory clarification is provided, we can stand together to enforce the rule consistently to the benefit of the organic dairy industry."*

The NOSB also passed a resolution at the recent 2018 Fall meeting. The resolution stated: *"It has come to the attention of the National Organic Standards Board (NOSB) that the continued state of varying interpretations and practices around the Origin of Livestock standards is creating market instability for organic producers."*

The resolution went on to state, *"Rulemaking is necessary to ensure consistent interpretation and enforcement of the standards for origin of livestock and provide industry with additional clarity of application of the organic dairy standards."*

The resolution concluded with a request to the Secretary. *"Therefore, be it resolved by unanimous vote, the National Organic Standards Board - as USDA's Federal Advisory Board on organic issues and representing organic farmers, ranchers, processors, retailers, and consumers- urges the Secretary to directly issue a final rule for Origin of Livestock that incorporates public comments submitted in response to the Proposed Rule (Docket Number AMS-NOP-11-0009)."*

MOSA strongly supports certifiers working toward a cohesive interpretation of the regulation. Consistent and fair enforcement of the standards is required. ■

nowhere in sight?

...It seems money and growth are our only main concerns. And since the climate crisis has never once been treated as a crisis, people are simply not aware of the full consequences on our everyday life. People are not aware that there is such a thing as a carbon budget, and just how incredibly small that remaining carbon budget is. That needs to change today...

We must change almost everything in our current societies. The bigger your carbon footprint, the bigger your moral duty. The bigger your platform, the bigger your responsibility.

Adults keep saying: "We owe it to the young people to give them hope." But I don't want your hope. I don't want you to be hopeful. I want you to panic. I want you to feel the fear I feel every day. And then I want you to act... I want you to act as you would in a crisis. I want you to act as if our house is on fire. Because it is.

Thanks, Greta. Now comes the work, and it is time to be bold. In these times, audacity is a necessity. ■



Greta Thunberg at the World Economic Forum in Davos, eastern Switzerland. Photograph: Fabrice Coffrini/AFP/Getty Image

MOSA

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