



## CATTLE CORNER

### Traceable Paperwork for Cattle Purchases Q&A

by Katie Webb, Dairy Certification Specialist

One of the most common phone call inquiries I receive is: "I am planning to buy some cattle, what paperwork will I need to show that the animals are certified organic?"

Traceability when purchasing cattle is the goal in your paperwork. This is easy to achieve if the seller and buyer are both attentive to a few details. Here are the important records and reasons for each:

1. Itemized Bill of Sale. This needs to list each individual animal's ID and the seller's information.
2. Organic certificate for the seller. This shows the organic origin of the animals.
3. Health history. This is often missing when cattle are bought and sold. However it is a valid record to request from the seller and will help you show compliance during your next organic inspection when health records are requested.

**Can't we just write the seller's MOFGA certification number on the bill of sale?** In the past, MOFGA Certification Services staff have accepted the certification number, however it was recently decided that we can no longer allow this. There is some risk that the seller's product is not listed on the certificate. It's both the buyer and seller's responsibilities to look at the certificate and make sure the item being sold (in this case, the cattle) is actually certified organic. The certificate will also tell you if the cattle will be eligible for sale as organic beef.

**What if there is a cattle dealer involved?** At this time there is no requirement that cattle transporters hold an organic certificate. However, it has been proposed for the NOP rule and we expect it will be in the future. If the cattle dealer is certified organic, MCS perceives very little risk to the certified organic status of the livestock being transported, since they will understand that any break in organic management of the cattle is not allowed under the NOP.

**What if my cattle dealer is not certified organic?** This scenario raises some concerns regarding continuous organic management of the cattle.

§205.236 Origin of Livestock. (b) *The following are prohibited: (1) Livestock or edible livestock products that are removed from an organic operation and subsequently managed on a nonorganic operation may be not sold, labeled, or represented as organically produced.*

This section of the National Organic Standards means that if the cattle dealer is not certified organic, and they take ownership, transport animals to a non-certified location, or provide any kind of management (e.g. feed during transport), the animals can no longer be considered certified organic.

Additional paperwork may be a good idea to provide transparency to your cattle transaction. You will want to create a document showing that the organic cattle were transported directly from the seller's certified organic farm to your own.

If there is any question in your mind regarding your plan to buy or sell certified organic cattle, feel free to give us a call.

Don't see your question here? Give us a call and we will get you the answers you need. MCS office 207-568-6030 or Katie Webb direct at 207-446-6520.

## ORGANIC CERTIFICATES AND YOUR INSPECTION

by Jacomijn Schraivesande-Gardei, Associate Director of Crops

Organic certificates are an important part of the audit trail and it is common for inspectors to let us know when an operation does not have vendor certificates on file. In addition to a bill of sale, you should collect organic certificates and have them present at your inspection if the following situations apply:

- **When buying in and re-selling organic produce**
- **For all out sourced products used in processing, both for on-farm processors and handlers**
- **When purchasing livestock feed and/or organic animals.**

Every certifier accredited by the USDA issues certificates. The National Organic Program (NOP) certificates must meet the following requirements:

1. The certificate must contain the phrase "NOP" or "USDA organic standards"
2. The certificate should be accompanied by a "profile" or "summary" listing the crops, products, ingredients, services, or brands covered by the certification. This may include international compliances and equivalency arrangements. At MOFGA Certification Services we call this the "product verification."

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## Organic Certificates (continued from Page 10)

- The certificate or accompanying profile/summary should have a recent date on it from within the last year (this may also be a "last printed" date).

When preparing for your inspection make sure that each certificate you have is up to date and that the certificate addendums list the product(s) you are using. If you need a certificate from a MOFGA certified client, a quick call or email to the MOFGA Certification office is all that it takes to get their certificate and product verification. For certificates issued by other certifiers it is best to contact the producer directly. If you have trouble obtaining a current certificate, you can go to the NOP's Organic Integrity Database (OID) (<https://organic.ams.usda.gov/Integrity/>) and print a screen shot of the supplier's listing. Do be aware that the OID at present does not include brand names and is not equivalent to having the actual supplier certificate.



## National Organic Standards Board Meeting: Saint Paul, Minnesota October 24 – 26, 2018

by Dave Colson, MOFGA Agricultural Services Director

In late October, the National Organic Standards Board (NOSB), an advisory board on organic regulations for the USDA National Organic Program (NOP), held its biannual meeting in St Paul, Minnesota. Additionally the National Organic Coalition (NOC) held its regular pre-NOSB meeting on October 23. The following are highlights of the two meetings.

### **National Organic Coalition (NOC) Pre-NOSB Meeting**

The National Organic Coalition is made up of a variety of stakeholders that support organic standards and seek to influence organic policy at the NOP and through activity on national issues. The Coalition is made up of farm organizations, environmental groups and consumer and industry organizations. MOFGA was a founding member of NOC and participates in regular meetings of the group throughout the year. To learn more about NOC visit: [nationalorganiccoalition.org](http://nationalorganiccoalition.org).

The daylong pre-meeting, facilitated by NOC, was open to any organization interested in attending. An agenda was provided and an outline for facilitation and process was presented. Topics for discussion included: enforcement challenges and next steps for the organic community, data collection (particularly acreage amounts reported by certifiers and the Integrity Database) and the status of the Origin of Livestock Rule that has not been completed. Jenny Tucker, the NOP Administrator, was present for the morning portion of the meeting and spoke to the enforcement work the NOP is doing on both their Dairy Compliance Program and Imports and how the NOP is developing systems for tracking through US Customs and Border Protection (CBP) and the Animal and Plant Health Inspection Service (APHIS). The afternoon featured an update on legislative work and policy issues in

Washington, DC and where the Farm Bill negotiations might go post-election. The final discussion of the day featured a panel discussion of a proposal to the NOSB on Marine Materials used in the formulation of seaweed-based fertilizers.

### **National Organic Standards Board (NOSB) Meeting**

The NOSB meeting opened with a report from Jenny Tucker, NOP Deputy Administrator. She highlighted five areas of ongoing work by the NOP. These included: Organic Control Systems, Farm to Market Traceability, Enhanced Enforcement, and Community Cooperation. Jenny also introduced the new Organic Integrity Learning Center, which is intended to "provide training that supports the professional development and continuing education of organic professionals working to protect organic integrity." To see the full report from the NOP go to <https://www.ams.usda.gov/sites/default/files/media/NOSBUpdateTuckerFall2018.pdf>

The regular format of a NOSB meeting includes the update from the NOP, two half-day public comment periods followed by deliberations and voting on proposals by the NOSB. Comments from the organic community included a wide range of topics, but one consistent comment was on the need to extend the temporary status of the Paper Chain Pot system until the NOSB could be petitioned to review their use, which the NOSB voted to support later in the meeting.

Other discussion topics during the fall meeting included: Genetic integrity and transparency of seed grown on organic land, Excluded Methods (new types of Genetic Modification) Determinations, Marine Materials in organic crop production and Training and oversight



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