If you are a young farmer today, thank you. If you are thinking of becoming a young farmer, thank you. Without you, we can’t make the changes that so many of us believe are critical to reforming our food system, and we certainly can’t reverse the devastating damage that has already been done due to our changing climate. We need you; we really, really need you.

By “reforming our food system,” I am talking about making it possible for more and more people to include healthy food in their diet, making it possible to have more of our food grown without toxic chemicals, and making farming practices that preserve our soil become the standard and not the exception. It means sending fewer herbicides and pesticides into our water supply and less pollution in the air. And it means supporting a food distribution network supplied with more food grown by the farmer down the road—and less food from a truck driven halfway across the country.

From where I sit, I know that consumers want things to change, and I can see that their demand is changing the market for what you are growing faster than any public policy I can promote. I know that as young farmers, you are in the right place at the absolute right time. The products you can grow will change our system, and the very act of farming and providing food to consumers will be the basis of how we push new policies…

…I want to look at one part of what you do: the importance of the political act of being a young farmer.

I assume you have chosen to farm because there is something you love in the act of farming. This includes the ability to work at a craft that requires you to understand and know so much—from weather patterns to soil science, the physiology of plants you grow, and the habits and nutritional needs of the animals that will graze in your fields. It requires an appreciation of the repetitive tasks—many that need to be done day after day, year after year—like feeding the chickens, weeding the carrots, watering the lettuce, harvesting the tomatoes, milking, shoveling, washing. It means checking the cold barn in the middle of the night or waiting up for the lambs or piglets or kids to be born, just in case something goes wrong and you need to be there to turn the baby so the mother can finally end her labor and start nursing the next generation.

I don’t want to attach some false romance to the work of a farmer, but there is some beauty to the repetition, and mostly you need to love it all enough that you can approach it with calm appreciation. In that way, while your hands work, your brain is free to observe and calculate, to determine what needs to be done next and what will make your farm a better operation. That is what will make you feel successful at what you do and what will make the work of farming feel rewarding and pleasurable. But if the chores really all feel like chores to you, perhaps now is the time to turn back.

In Maine, where I live, people are returning to farming, which is reversing the trend of people moving away from farms—a trend that had been going on for many, many years. This return is part of the idea of farming as a political act. And consumers are increasingly searching out food that they believe will be more nutritious for them and their families. As there have been more opportunities to find this food, they are choosing the healthier, better-tasting options so they know what they are getting.

This is all good—because it means that if you choose to be their farmer, you will have grateful consumers who will appreciate the many hours you spend providing them tasty, healthy food.

(Continued on Page 3)
Certification – Numbers, Trends and Expectations

2017 has been a steady year for MOFGA Certification Services (MCS), with solid growth in certification applicants and many changes to our internal processing systems. As we near the close of the calendar year, we take a look at the Maine certified agricultural landscape as it stands now, as well as trends and expectations for the coming year and beyond.

Current Metrics
MCS currently certifies 542 operations as organic under the USDA National Organic Program rule (see infographic on Page 3).

MOFGA Certified Clean Cannabis
2017 marked the first year that MOFGA’s Certified Clean Cannabis program moved out of the trial period. We received nine applications for certification from various cannabis and hemp producers across the state, and are currently working our way through the inspection and certification process. In addition, our existing trial group participants are getting recertified through their annual updating process. By year’s end we hope to have 14 operations using our Certified Clean Cannabis brand to market their products. In 2018, producers will be able to certify processed products in addition to their raw cannabis and hemp.

Trends
This year proved to be a challenging one, both nationally and here in our home state. Media reports questioning organic integrity, wholesale fluid organic milk prices in decline and international imports of grains and other crops with traceability concerns dominated headlines.

While in many ways Maine is not directly impacted by these larger national challenges, the wholesale dairy sector has been hard hit due to its ties to the pricing structures. Large-scale dairies coming into the organic market in the West and Midwest have increased supply, forcing the price per hundredweight to drop dramatically, even from just a year ago. Quotas and reductions have been implemented as a stopgap measure and some of our transitioning dairy operations were ultimately not offered contracts due to market pressures. While the hope is that the pricing and supply will rebound, it has proved a major challenge to all operations, both large and small.

One area of our client portfolio that continues to gain ground is processors and handlers. Value-added products produced organically and locally are increasing in demand, and many of Maine’s processors are moving toward organic certification for some or all of their product lines. MCS saw increases in maple, sea vegetable and processed-product applicants. We are actively engaging with many area businesses as they look to enter the organic market. This bodes well for the Maine organic landscape overall, because many of these processors will source ingredients from local farms and producers.

Expectations
MCS expects to see similar trends in 2018 as we saw in 2017. Our expectation is to certify roughly 50 applicants, which will bring us close to 600 certified operations. Our goals include streamlining the application and renewal process, making progress toward a more robust online Organic System Plan (OSP) management system, and offering a positive client experience through access to MOFGA’s resources. In addition, we hope to make major strides toward the continuing promotion of MOFGA’s certified organic brand and the farms and producers we certify.

With an ever-changing landscape, it is imperative we continue to offer value to both certified operations that enter into the organic market and the end consumer. Organic integrity, along with fair market pricing, perceived value, and messaging will prove crucial to the continued success of the sector.

—Chris Grigsby, MCS Director
### 2017 MOFGA Certified by Production Category (SCOPE) Total: 542

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**Letter to a Young Farmer**

(continued from Page 1)

grown in an environmentally sound manner. It means you have a better chance of being paid well for your hard work and your skills that have made it possible for those wonderful tomatoes or melons to come from your farm…

…In the end, the most political act of all starts with you. In a way, it is so simple—just proving every day that you can grow the food that we all want to eat and want to feed our families. I can stand up to make the most eloquent and articulate argument about why we need to do things very, very differently—but unless you are there, with your delicious tomatoes at the farmer’s market, filing up the CSA boxes every week to supply the families of your community with healthy food, and selling the chickens you have proven can be grown without antibiotics—unless you are there, someone can always say, “That’s nice, but it can never happen.” Thanks to the growing number of young farmers who are daily lending their hard work and creativity to finding a better way to grow our food, I believe we can make it all change.

Chellie Pingree lives on the island of North Haven in Maine, where she is a longtime organic farmer. She has represented Maine’s First District in Congress since 2009 and is an outspoken advocate for federal policies that better support sustainable farming.

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**2017 James Beard Foundation Leadership Award presented to Congresswoman Chellie Pingree**

The James Beard Foundation awarded U.S. Rep. Chellie Pingree one of its Leadership Awards during the organization’s annual food summit in New York City on October 23rd. Pingree, who represents Maine’s 1st Congressional District, was also one of the summit’s keynote speakers. Her topic: how consumer demand for local, organic food is shaping food policy in Washington, D.C.

Pingree said the widespread public interest in sustainable farming practices and increased transparency in the food industry crosses all ages and economic status—and party lines, noting that she has more Republican co-sponsors for her bills than ever before.

Pingree is sponsoring the Organic Agriculture Research Act, which would more than double the amount of USDA funds going into organic research. Although the market for organic foods has doubled in the last decade, she said, the amount of money dedicated to research is still one-tenth of 1 percent of the entire USDA budget. Pingree is also sponsoring the Food Recovery Act, which would reduce food waste, and the Local Farms Act, which would help low-income consumers and veterans buy CSA shares, give schools more flexibility to buy local foods and launch a pilot prescription program for consumers who want to use food as medicine.

Representative Pingree speaks at the Common Ground Country Fair on Organic Integrity

As the 41st annual Common Ground Country Fair began on Friday, September 22nd, 2017, U.S. Congresswoman Chellie Pingree spoke on behalf of defending the integrity of the Organic Certification Standards. The following is an excerpt of her speech.

The full video can be found on MOFGA’s YouTube channel at: https://www.youtube.com/watch?v=qHe6JhJUJgw

I was at some of the earliest [MOFGA] meetings back in the seventies. Some of the people who pioneered the organic movement in Maine have taught me everything I needed to know. I was an early employee of MOFGA and was the first apprentice in the apprenticeship program. So, when I bring my experience and knowledge to Washington, it’s really thanks to everybody in the state of Maine and all the farmers that we connect with [here].

Many of you have worked so hard to support organic farming and to support the integrity of an organic brand. You have given me the stories and the experience to go down to Washington and say, “I’m not making this stuff up. I live in a state where the average age of the farmer is going down. Where we have doubled the number of women going into farming. Where we have new land under cultivation.”

...We have a rural economy that’s been growing because of people’s interest [in], and support for, organic farming and providing locally. That support is really important on the side of the farmers and the growers, but also the consumers and the eaters.

Maine people will go out of their way to buy food locally, to join a CSA, to do everything they can to support their rural environment.... People who come to visit Maine say to me, “I’m going to take a vacation in your state and I can’t wait to start eating.” That’s because we grow the best food, cook the best food, and we have the best people doing the work.

I want to talk a little bit about organic integrity. That is something that I know a lot about from the growers’ side and the consumers’ side.... I have an organic vegetable operation and the standards aren’t easy to meet. We all put a lot of effort into it. We work hard to have good soil. We work hard to practice and to comply with the standards. I am one of many people who has a growing concern about how we make sure we protect that integrity and I’m working on that from the federal level.

Organic farmers deserve to get a good price. The biggest danger to that is flooding the market with [products] that are not accurate. That are not organic. That are fraudulent.... Right now, about 50% of organic corn in this country and maybe 70% of organic soybeans are imported from another country. I have two really big concerns about this. One is about the integrity of what comes in. The second is about the importance of the USDA in encouraging more organic farming [domestically].

...The USDA, in my opinion, has a responsibility to assist farmers and consumers to get exactly what they are looking for.... some [USDA] programs get used in Maine and are very beneficial: [the Local Food Marketing Promotion Program and the Farmers Market Promotion Program] for people who want to buy locally, EQIP (the Environmental Quality Incentives Program), and Value-Added Producers Grants for young farmers and ranchers, among others.

...[These grants] make up a very small part of the USDA budget, but they make a huge difference if you want to add hoop houses and extend your season. If you want to start an organic goat cheese dairy. If you want to...start a new farm but you don’t have the capital to get started. These programs are incredibly important. I say to the USDA—and have for the last few years—that it’s a dereliction of their duty if they’re not doing things to encourage more organic farming when it’s currently 13% of the market. That [13%] should be all domestic!

We should be creating opportunities for American farmers. That should be their first job, but they don’t do anywhere near enough of it.

These last eight years I spent in Congress, I’ve been working on the policies in the farm bill...to give less to crop subsidies for corn, cotton, and wheat in places where they don’t need the subsidies, and give more to the things that consumers want—that’s organic, sustainably grown, and locally grown food. We have to change the policies at the USDA. We’re working hard, but as you can imagine, when it comes to food and farm policy there are about 1,200 lobbyists on Capitol Hill, who spend over 300 million dollars a year, to convince my colleagues, generally, to do the opposite of what I think they should do. So, make no mistake, this isn’t an easy thing to change!

...One other big piece of legislation we’re working on is getting more [money into] organic research.... We have a bill right now to move 50 million dollars into organic research. It only makes a dent [in what’s needed], but we’re working together...and saying, “Not only do we need to protect organic integrity, but we need to invest in this!”

We had the Office of the Inspector General in front of [the Agricultural Appropriations Committee] recently. Their job is to oversee things like [organic integrity] and they just came out with a report on imports. The report held up what we already knew.... It said the National Organic Program had to have better controls at the point of entry; that means we have to have better inspections. There should be much more transparency, so we can tell, when something’s imported, whether it was inspected and where it came from.

There are countries that, allegedly, are exporting more organic products than they could possibly grow. We don’t have any doubt that there’s fraud out there. We know that at times “organic” products are fumigated and treated with chemicals...

We need a better system for tracking... and [the Agricultural Appropriations Committee has] been working on some remedies.... You can take out your smartphone and know every step you took yesterday...there’s no reason we can’t understand where a soybean was grown, who inspected it, and how it got to us!

(Continued on Page 8)
POTABLE WATER USAGE AND REQUIREMENTS ON MOFGA CERTIFIED ORGANIC FARMS
by Jacomijn Schravesande-Gardei, Associate Director of Crops

As a certified producer, you are responsible for the quality of the water used to grow, wash, and process food. MOFGA Certification Services’ Practices Manual states that water used to rinse produce must be potable. Potable water is water that is safe to drink or use for food preparation without the risk of health problems. Water contamination can occur from biological and chemical contaminants, and different tests are needed to ensure your water is safe.

Biological Contamination
Microbiological contamination of water used for washing, rinsing, or cooling vegetables—and even for irrigating crops—can make people sick. This is not good for the person, producer, certifier, or the organic movement! Some crops are particularly vulnerable, such as “ready to eat” vegetables and leafy greens. Most farms in Maine use well water to wash, rinse and cool vegetables. If you use well water the expectation is to test this water with a basic water test for bacteria once a year. For more information on this test please see the link at the end of this article.

Water used for irrigation presents different challenges. Water taken from open sources such as irrigation ditches, ponds, rivers, lakes, or shallow wells is most likely to have microbiological contamination. Open water sources are difficult to test because they are vulnerable to change during the year. When water levels are lowest, the risk of contamination is often highest. Surface runoff after rainfall can also heighten the risk of contamination. Many tests might be needed to assess risk each year. Any time there is a change in the irrigation source, water levels, or upstream activity, risk increases. If you suspect, that the water you use for irrigation has an increased risk for pathogens, consider stopping your irrigation two weeks before harvest. It also makes sense to use types of irrigation (e.g. drip) where water will not touch the edible portion of the crop. Please note that once the FDA starts enforcing the water regulations under the new Food Safety Modernization Act (FSMA) rules, the testing requirements for irrigation water could be extensive. Please see “Key Requirements for Agricultural Water”: https://www.fda.gov/food/guidanceregulation/fsma/ucm334114.htm. The implementation timeline for these requirements has been extended due to the complexity and confusion from growers.

Chemical and heavy metal contamination
Contamination of crops or land with pesticides, chemical fertilizers, or industrial waste is prohibited. This could occur either in irrigation or wash water. Watch for higher risk contaminants such as industrial wastes and substances applied directly into water. If you farm in an agricultural area, watch for high concentrations of fertilizers or chemicals from conventional farming practices upstream from you. You are required to report possible contamination to MOFGA Certification Services (MCS). We do not normally ask for a general chemical screen on water because there are so many chemicals, including minerals, in water that it is best to test only if there is a specific concern. Furthermore, concerns around surface water differ from groundwater sources. This is why your Organic Farm Plan asks you to identify possible sources of contamination around your property or known contaminants in the water.

Keep in mind that water in Maine is often high in arsenic, radon, and uranium. The small amount of wash water your clients will consume from eating crops washed with water that has high arsenic is probably negligible compared to using this water for drinking water. Therefore, as recommended by the State of Maine, conducting a basic water test every year for bacteria, nitrates and nitrates and a full water test every 3 to 5 years for chemicals such as arsenic, radon and uranium is highly recommended.

Use of Billboard Tarps on Organic Farms
Last year, participants at MOFGA’s Farmer to Farmer Conference discussed the use of billboard tarps on organic farms for smothering weeds. Please know that our research on billboard tarps has revealed that many of them are made with an outer layer of PVC.

NOP 205.601 Synthetic Substances allowed for use in organic crop production states that plastic mulch and covers are allowed if they are petroleum-based other than Polyvinyl Chloride (PVC). PVC is not allowed due to its toxicity. It is made from vinyl chloride, which the Environmental Protection Agency (EPA) has classed as a carcinogen. Furthermore, the PVC manufacturing process releases vinyl chloride and other toxins, notably dioxin and hydrogen chloride, into the environment. While the NOP rule does allow using tarps or coverings as a kill step for smothering weeds, you will have to make sure they are not made with PVC. If they are made with PVC, the rule prohibits the use of them. MOFGA Certification Services (MCS), along with MOFGA’s Agricultural Services department, will continue to research this option. Please check with MCS prior to using any tarp or covering to ensure it is allowed as a mulch.

Materials Review and Approval
MOFGA Certification Services’s website has a wealth of information! One new feature on the page is information about materials review and approval. Please check http://www.mofgacertification.org/?page_id=3663

Answers to questions such as what materials can be used, how often MCS re-assesses approved materials, explanation on the national list and much more can be found here.
The National Organic Standards Board (NOSB), an advisory board on organic regulations for the USDA National Organic Program (NOP), held its biannual meeting in Jacksonville, Florida at the beginning of November. Additionally, the National Organic Coalition (NOC) held its regular pre-NOSB meeting on October 30. The following are highlights from these meetings.

National Organic Coalition (NOC) Pre-NOSB Meeting
NOC is made up of a variety of stakeholders that support organic standards and, through activity on national issues, seek to influence organic policy at the NOP. 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/

The daylong pre-meeting, facilitated by NOC, was open to all interested organizations and attended by approximately 100 participants. Participants were provided with an agenda, and presented with an outline for facilitation and process. The meeting began with farmer updates from around the country. Themes included unfair competition in the market from large hydroponic operations; fraudulent grain imports; and the pressure to lower prices at the farm gate for organic products. Additionally, farmers spoke of competition from questionable dairy operations, and the unfair advantage of these operations in the milk market; genetic contamination; pesticide drift; the influx of multiple labels in the marketplace; the saturation, and even shrinkage, of direct market outlets; labor and immigration issues; and access to land for new farmers and those who wish to expand existing farms and ranches.

Following the updates, a panel consisting of representatives from the Organic Trade Association (OTA), OFARM, and the Accredited Certifiers Association (ACA) discussed stakeholder strategies for strengthening organic enforcement domestically and internationally. Gwendolyn Wayard of the OTA reported they are preparing a “best practice” guide for assessing fraudulent organic products. Jenny Cruse reported that the ACA is working on assessing organic product paper trails all along the supply chain. Certifiers expressed concern about uncertified handlers in the marketplace; poor and/or fraudulent labeling; inconsistent auditing by the NOP; lack of uniform information collected by certifiers; and the amount of documentation required by certifiers on overseas products. They also mentioned the need for increased information-sharing among certifying agents.

The NOP completed a record number of 462 complaint reviews/ investigations.
75% of complaints were about uncertified operations representing themselves as organic.
The NOP has posted a new searchable spreadsheet of fraudulent certificates.
This winter, in-person certifier training conducted by the NOP will focus on training certifiers on enforcement for imports.
The NOP is exploring options for standards-based initiatives to certify organic products should also be certified, and that the addition of an organic handling plan would allow certifying agents to evaluate compliance. This proposal is still in the development stage and will be discussed in future NOSB meetings.

The final presentation at the meeting centered on the Rodale Institute/National Science Foundation Regenerative Organic Certified Label. Some highlights of this add-on label proposal include: Soil Health (no/low tillage, building of organic matter, no soilless systems) Animal Welfare (no CAFOs, suitable shelter, grass fed/pasture raised), and Social Fairness (living wages, maximum working hours, fair pricing for buyers/farmers). The label is envisioned to have three levels of compliance with farm operations required to move to the highest level over time. There is currently an open comment period for the label until the end of November. To learn more go to: https://rodaleinstitute.org/regenerativeorganic/

National Organic Standards Board (NOSB) Meeting
The NOSB meeting opened with a report on the NOP by Dr. Jenny Tucker filling in for new interim Deputy Administrator, Dr. Ruihong Guo, who had not yet begun in her role. Below are some highlights from Dr. Tucker’s presentation:
• The NOP completed a record number of 462 complaint reviews/ investigations.
• 75% of complaints were about uncertified operations representing themselves as organic.
• The NOP has posted a new searchable spreadsheet of fraudulent certificates.
• This winter, in-person certifier training conducted by the NOP will focus on training certifiers on enforcement for imports.
• The NOP is exploring options for standards-based initiatives to
address import issues. It is also supporting the NOSB’s work to address problems with imports, including getting better data in the organic integrity database to tackle some of the enforcement issues and tracking.

- Temporary Administrator Tucker went through, in detail, the Office of Inspector General (OIG) report findings and recommendations on equivalency agreements and imports.

- The Agricultural Marketing Service (AMS), the department at the USDA that houses the NOP, has a Memorandum of Understanding with Customs and Border Protection (CBP) and supports expanding the MOU. However, the CBP has limited capacity and no current authority to review import certificates for organic products, a problem that may need to be addressed through legislation.

- An American National Standards Institute (ANSI) peer review was conducted of the National Institute (ANSI) peer review import certificates for organic products, a problem that may need to be addressed through legislation.

NOSB Import Panel

The NOSB hosted a panel of government offices that track and inspect imports and ports of entry to better understand how tracking of organic imports can be improved. Offices on the panel included the USDA Marketing Orders and Agreements Division; the USDA (Animal and Plant Health Inspection Service) APHIS/Plant Protection and Quarantine; U.S. Customs and Border Protection; and the USDA National Organic Program (NOP). These offices (minus the NOP) worked with a government program under the Obama administration to update and modernize the reporting of imports among 46 different government agencies tasked with tracking, inspecting and reporting on imports of goods into the US. Not all of these agencies deal with food imports and some only collect data on imports for informational purposes.

Two major issues were identified by the panel: 1) the NOP had no role in the updating process and current tracking regime, and 2) instances of fumigation treatments of organic food imports are not required to be reported to the NOP. The general feeling of the representative of APHIS was that, in order for the NOP to access the tracking of imports, it would take a legal (statutory) change to the law. The law would need to provide agencies with the authority to participate in the national import database. This appears to be a major hole in the current inspection and tracking of organic imports, and has been a major hurdle in addressing organic import fraud. In the fifteen years the NOP has existed, no process has ever existed for tracking and verifying organic imports.

Hydroponics

Reported by Aby Youngblood, Executive Director, NOC

The Jacksonville meeting was a particularly challenging meeting—the discussion over hydroponic production revealed that we are a community deeply divided over the most appropriate way to regulate these types of operations. NOC (and MOFGA) has long called on the NOP to establish clear and consistent standards before allowing certifiers to certify hydroponic, aeroponic, and aquaponic operations. We believe this consistency in standards across certifying bodies is fundamental to the integrity of the seal and are dismayed that the USDA has allowed certification of more than fifty hydroponic and aquaponic operations without this clarity.

NOC was in support of the Crops Subcommittee recommendations to prohibit hydroponic, aeroponic, and aquaponic production. And we urged the NOSB to support the Crops Subcommittee recommendation on container production as a compromise solution that allows container growing to continue when it is founded on the principle of feeding the soil, not the crop. We note that highly soluble crop nutrients (which the hydroponics industry and many container systems are heavily reliant on) have been thought of as inappropriate for organic farming right from the start. This is discussed in the preamble to the NOP Final Rule. The failed Crops Subcommittee proposal on container production would have placed a restriction that is consistent with the intent of the final rule and founding principles of the organic movement, and also with how other highly soluble nutrients, such as Chilean nitrate, have been regulated.

With the exception of the proposal to prohibit aeroponic production in organic (which passed with 14 NOSB members in support and 1 abstention), the proposals to prohibit hydroponic and aquaponic, and a proposal to impose limitations on container production failed with only 7 NOSB members in favor and 8 opposing (10 votes, a 2/3 majority was required to pass these proposals).

This vote was accompanied by a strong sense of betrayal from some sectors of the organic community.

So where do we go from here? In Jacksonville, NOSB members discussed the possibility of a label for “hydroponic organic” products—this is something we might see on the NOSB’s work agenda for the upcoming Tucson meeting next spring.

NOC and MOFGA recognize the critical importance of continued and sustained efforts to preserve and strengthen the integrity of the USDA organic seal. We’ve come too far to relinquish what started as a grassroots, movement-led program at the USDA and has turned into a nearly $50 billion industry. We will continue to contribute to, and support the work of, the NOSB. The board plays a critical regulatory role and their work should lay the foundation to address challenges we are facing within the organic sector on multiple fronts.
The Organic Sprout

CATTLE CORNER
Organic Milk ≠ Organic Beef

by Katie Webb, Dairy Certification Specialist

Many people assume that an organic dairy cow would naturally be good for organic beef. However, that is not the case. The organic standards for dairy/milk are slightly different than for slaughter stock/beef. That is why MOFGA Certification Services inspectors are checking records for slaughter eligibility during the annual dairy inspection.

In order to verify the slaughter eligibility of the dairy herd, the organic inspector will be checking to see that health history records are kept for each cow, what types of health care materials are used, and that calving records are complete and traceable for each animal to the last third of its gestation. In other words, the dam and date of birth on an organic farm.

Slaughter eligibility of the organic dairy herd falls into three categories. You will likely see one of the following listings added to your organic product verification this year:

- **Dairy cattle for slaughter—some eligible**
- **Dairy cattle for slaughter—all eligible**
- **Dairy cattle for slaughter—none eligible**

**Some eligible.** This applies to many dairy farms. Examples include established herds that still contain individuals from the original dairy herd transition, herds with purchased organic cattle that did not come with the ideal paperwork documenting dam and exact date of birth as well as health history records, or operations that have used ivermectin, moxidectin, or fenbendazole on some individuals.

**All eligible.** This applies to operations where all animals are organic from the last third of gestation. Many closed herds meet this criteria. Additionally, records of the lifetime health history document that the slaughter stock requirements are met indicating that ivermectin, moxidectin, and fenbendazole are not used.

**None eligible.** An example is an operation that has recently completed the organic transition, or an operation that cannot provide documentation of health treatments over the lifetime of the animal.

If you would like to sell cull dairy animals for organic slaughter, you will need to provide your buyer with a copy of your organic certificate and any other documentation that he or she may request. If you would like to buy dairy culls for organic beef, we recommend not only requesting the organic certificate but also documentation of the animal’s organic status from the last third of gestation (dam and date of birth) and health records.

**Relevant sections of the Rule**

§205.236 Origin of livestock.

(a) Livestock products that are to be sold, labeled, or represented as organic must be from livestock under continuous organic management from the last third of gestation.

(b)(2) Breeder or dairy stock that has not been under continuous organic management since the last third of gestation may not be sold, labeled, or represented as organic slaughter stock.

(c) The producer of an organic livestock operation must maintain records sufficient to preserve the identity of all organically managed animals and edible and nonedible animal products produced on the operation.

§205.603 Synthetic substances allowed for use in organic livestock production.

(a)(17) 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. Milk or milk products from a treated animal cannot be labeled as provided for in subpart D of this part for 90 days following treatment. 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.

(i) Fenbendazole (CAS #43210-67-9)—only for use by or on the lawful written order of a licensed veterinarian.

(ii) Ivermectin (CAS #70288-86-7).

(iii) Moxidectin (CAS #113507-06-5)—for control of internal parasites only.

Rep. Pingree’s Speech at CGCF
(continued from Page 4)

The other issue within this country is organic deception. That’s a particularly big concern for us and for a lot of small- to medium-sized farmers. I can’t tell you how many dairy farmers talk to me about how carefully they protect the brand every step of the way. Yet [we] see big dairies where questions are raised about whether or not the cows ever get to see a blade of grass. So, when it comes to enforcement and upholding strong standards, we’re arguing the same thing at the USDA: that there aren’t enough inspectors, that they’re not cracking down hard enough. Last year, we know how many complaints and investigations there were, and we also know that not enough of them were reviewed and not enough penalties were assessed. You cannot protect the brand if you don’t enforce it, and you can’t ask people to work as hard as they do as organic farmers if you’re not protecting that brand… You can’t count on consumers to trust a product forever if they start to get worried they’re paying for something that isn’t true!

The last piece that I’ll mention is that… we’re fighting for the Organic Livestock Rule (the Organic Animal Welfare Rule). The Organic Livestock [and Poultry Practices] Rule is something we’ve needed for a long time: to have it clarified in law that an organic chicken has to see daylight—it has to scratch on the ground. An organic cow has to eat grass and lead a life on pasture. You can’t mess with these standards and you can’t try to claim something as organic when it isn’t!

...We need to have more people fighting back…and more consumers keeping an eye on all this, which I know everybody here does. And I just want to say how much I appreciate coming from the state of Maine, where people care deeply about these things. Where they understand the rural economy. Where, however much money they have in their pockets, they do everything they can to buy locally, and to buy [products that are] organically or sustainably grown…Thank you so much for being here, and for taking the time to listen, and I’ll look forward to working with you on this, and so many other issues, as we keep up the fight.
The Organic Sprout

Organic Updates

Miles V. McEvoy, Deputy Administrator of the National Organic Program, retired September 30 after eight years with the NOP. His intention is to return to his home state of Washington and take some time off before looking “…for other opportunities to serve the organic community from my home in Olympia.” We wish Miles the best and hope to hear from him soon. To view Miles’ farewell letter and his accomplishments over his years at the NOP search Google for “Miles V. McEvoy Retirement Letter”.

On October 19th, the USDA announced that Ruihong Guo, PhD will assume the role of Acting Deputy Administrator for the NOP. Guo previously was the Deputy Administrator of the USDA Agricultural Marketing Service’s (AMS’s) Science & Technology Program. She also served as the AMS Associate Administrator, Associate Deputy Administrator for NOP, the Director of the NOP Accreditation and International Activities Division, and the Director of the NOP Compliance and Enforcement Division.

Exporting Products to the European Union

The European Union (EU) has initiated an electronic system for tracking products imported into its member states. If you think you may have an opportunity to export your products to the EU you must sign up for their ‘TRAd Control and Expert System NeWork’ (TRACES NT). All parties in the organic supply chain must be verified to use the system. It does take time to get verification. MCS is currently a verified accredited NOP certifier and we must sign off on any exported organic product you send to the EU if it is to be sold as organic in the EU. If you want additional information regarding exporting to the EU, contact your Certification Specialist at MCS. The TRACES site is: https://webgate.ec.europa.eu/tracesnt/login For training: https://webgate.training.ec.europa.eu/tracesnt/login

Are you Importing or Exporting Products from Other Countries?

If you are importing or exporting organic products you should be aware of a new Directive from the NOP. On October 25, 2017 the NOP issued an interim instruction titled Maintaining the Integrity of Organic Imports. This document outlines the responsibilities of certified operations and certifiers regarding documentation and record keeping for products that are both imported and exported to/from the U.S. This document can be found by googling, “NOP Program Handbook 4013.” MCS will be adding questions about the import and export processes. For more information, factsheets are available from the NOP for both importing and exporting to/from the U.S. Google "Importing Organic Products into the US" and "Exporting Organic Product from the US", then select the links that begin with "www.ams.usda.gov..."

While Interim Instruction NOP 4013 is designed to assist USDA accredited certifiers, public comment is also invited. To make a comment go to www.regulations.gov and search the title, "Interim Instruction, Maintaining the Integrity of Organic Imports.” The 60-day public comment period runs from October 25, 2017 until December 26, 2017.

Organic Trade Association Sues USDA

The Organic Trade Association (OTA) announced September 14, 2017 that it filed a lawsuit against the U.S. Department of Agriculture in response to the agency’s delay in implementing the Organic Livestock and Poultry Practices (OLPP) regulation, more commonly known as "the organic animal welfare regulation.” The trade association is taking this legal action to ensure that the government allows this organic rule to move forward. OTA is standing up to protect organic integrity, advance animal welfare, and demand fundamental government fairness in organic standard setting.

Additionally, the Accredited Certifiers Association (ACA), of which MOFGA Certification Services is a member, has developed a working group to develop best practices for implementing the final rule into our certification protocols. If the rule does move forward, the ACA group will work with certifiers to include the new rule provisions in the certification process.

Processing News

The division of Quality Assurance & Regulations at the Maine Department of Agriculture, Conservation and Forestry provides assistance to small food producers. The entire department works to provide assistance and answer questions pertaining to licensing, facility requirements, food processing hazards, and distribution. They will make preliminary visits to potential processing sites as well as provide education and outreach. QA&R has inspectors located throughout the state to provide help and support to new processors. Information about the division can be found at: http://www.maine.gov/dacf/qar/index.shtml.

You can contact Quality Assurance & Regulations at 207.287.3841.

Other resources:
License application: http://www.maine.gov/dacf/qar/permits_and_licenses/application_forms.shtml
“Recipe to Market: How to Start a Specialty Food Business in Maine”: https://extension.umaine.edu/publications/3101e/
Organic Livestock and Poultry Practices Final Rule Status

As reported in the spring issue of The Organic Sprout, the Administration directed the USDA’s Agricultural Marketing Service to delay the implementation of the final rule until November 14, 2017. On May 9, 2017, two notices appeared in the Federal Register. One was to further delay the rule implementation until November 14, and the other was a second proposed rule requesting public comment on the following language:

(1) Let the rule become effective. This means that the rule would become effective on November 14, 2017.

(2) Suspend the rule indefinitely. During the suspension, USDA could consider whether to implement, modify or withdraw the final rule.

(3) Delay the effective date of the rule further, beyond the effective date of November 14, 2017.

(4) Withdraw the rule so that USDA would not pursue implementation of the rule.

MOFGA has joined with other accredited certification bodies, the Organic Trade Association, the National Organic Coalition and several other entities to submit comments urging for the allowance of the rule to become effective.

AMS received over 47,000 comments on the four options for agency action. Over 40,000 of commenters, including over 34,600 submitted as form letters, supported “Option 1: Implement”; 28 other commenters supported “Option 4: Withdraw”; a few chose “Option 2: Suspend”; and only one chose “Option 3: Delay.” The remaining commenters did not indicate a clear preference.

On November 9, 2017, AMS issued an additional delay until May 14, 2018, to further review the rulemaking process. The delay announcement included a critique of the calculation of the benefits estimates: “Of note, during the course of reviewing the rulemaking record for the OLPP final rule, AMS discovered a significant, material error in the mathematical calculation of the benefits estimates. With the material error, the regulatory impact analysis presented costs and benefits in a table that could be reasonably interpreted to conclude that benefits were likely to exceed the costs.” AMS is planning to continue to seek comments regarding the rule.

MOFGA’s Certified Clean Cannabis program grew substantially in 2017 through Board approval to move it from its trial phase to a full program. After the application period, we were able to certify an additional eight operations, bringing our total to twelve. We are proud to list the following operations as certified:

- LoveGrown Caregiver Services, erica@lovegrownhealing.com
- Rocky Hill Landscaping and Nursery, john@rockyhillinc.com
- East Coast CBDS, http://www.eastcoastcbds.com
- Dynamic Medicinals, dynamicmedicinals@gmail.com
- Maine Grown, LLC, http://www.mainegrown.farm
- Dyer Ridge Pharm, www.dyerridgepharm.com
- Wild Folk Farm, wildfolkfarmers@gmail.com
- Natures Resolution LLC, NaturesResolutions@yahoo.com
- Sweet Dirt LLC, sweetdirtllc@gmail.com
- Stony Brook Organics LLC, StonyBrookOrganics@yahoo.com
- Trillium, anthony@trillium-botanicals.com
- Casco Bay Cannabis Company, southernmainecaregiver@gmail.com
Dear Certification Specialist...

Dear Specialist,

My neighbor is an organic dairy farmer who asked if I had any honey because he needed some to make a homemade electrolyte mixture to feed to a dehydrated calf. I gave him a jar of my wife’s non-organic honey. He said it did not matter that it was not organic because he wasn’t feeding it to the calf. How is it possible to give this conventional product to an organic animal? How can the calf still be organic?

Help! I don’t understand the requirements and differences between feed supplements and healthcare inputs.

Signed,

Confused

Dear Confused,

Your neighbor is right. It matters what you give to organic livestock, and whether it is classified as a feed supplement or a healthcare material.

A feed supplement must meet the organic livestock feed requirements, including the use of certified organic agricultural ingredients. A feed supplement is a combination of nutrients added to livestock feed to improve the nutrient balance or performance of the total ration. A feed supplement is fed or offered free choice to livestock on a long-term basis in the absence of illness for health maintenance and prevention.

Healthcare materials, on the other hand, are not restricted by the livestock feed requirements and may contain non-organic agricultural ingredients. A healthcare material is given to the animal to treat an illness or physical condition.

Certain products such as honey can be considered either a feed ingredient or healthcare material as they may provide nutritional value as well as a health benefit. So when evaluating a conventional honey for allowance, MOFGA Certification Services will take into account how a producer will be using the product. If your neighbor were to use the honey as part of the feed ration in order to meet the nutritional needs of the calf then it would be considered a feed ingredient, would have to meet the feed requirements, and it would have to be certified organic honey. If he is only using it to treat a periodic health concern and did not administer it to all animals with regularity, then it would be reviewed under the healthcare standards. Since your neighbor only used this non-organic honey to aid a dehydrated calf he could use a non-certified organic honey in the electrolyte mixture.

If you are interested in an electrolyte recipe the following is from Diane Shivera’s “Raising Organic Livestock in Maine: MOFGA Accepted Health Practices, Products and Ingredients,” 2016. Take 1 teaspoon salt, 1 teaspoon baking soda, 1/4 cup honey or molasses, 2 tablespoons psyllium hulls (optional), 2 quarts warm water and blend them well.

Staff News

Rachel Siviski

Please welcome Rachel Siviski, our new MCS Operations Assistant. Rachel will be the primary point of contact within the MCS Office, covering phone and email communications, so many of you will have the chance to speak with her. Rachel is an artist, writer, gardener, and house project dabbler. In 2016, after nearly a decade away from Maine, she moved back to her home state and bought an 1840s house in downtown Belfast. She loves living by the ocean and can often be found exploring Penobscot Bay in her kayak. She holds a B.A. in International Studies from Middlebury College and worked previously in academic editing and language education.

Jacki Perkins

Jacki Perkins has joined MOFGA’s Agricultural Services team as Organic Dairy Specialist. Jacki was raised on Bull Ridge Farm, in Albion, Maine, and was introduced to alternative veterinary medicine at a young age by her mother, Henrietta Beaufait, DVM. Growing up, Jacki spent long summer days helping her dad, Henry Perkins, bring in hay, silage, grain, and other crops for the farm. She learned valuable lessons about fixing what you break, working long hours, and that failure is no reason to quit.

Jacki graduated from Vermont Technical College with an Associate Degree in Dairy Farm Management. From there she went on hiatus from production scale agriculture, moved to Vermont and experimented with various homesteading techniques. Over the years she has raised many types of domestic livestock including ducks, pigs, heritage breed sheep, chickens (both egg production and meat), guinea fowl, geese, rabbits, goats, dairy and beef cows. Meeting the challenges of negotiating land use with non-agriculturally minded landowners, finding and storing feed, and managing time between an off-site job and the necessary demands of the homestead are all issues Jacki has faced and met head on. Her desire to educate and guide those seeking a similar lifestyle has been a top priority.

Jacki worked breeding cows artificially for Genex for two years after she moved back to Maine, where she had the privilege of seeing many different production scale dairy operations. Seeking more experience and control over all aspects of a herd, she became herd manager for Gold Top Farms, LLC in Knox, Maine. After learning she was pregnant with her son, Fidel, she found slightly less strenuous work milking certified organic cows at both Misty Brook Farm in Albion, and Springer Farm in Knox.

Jacki finds she thrives on the mix of excitement and challenge her new position contains. She says, “I love it! I feel exhilarated every time I’m able to collaborate with a producer, and help them negotiate the challenges of our evolving organic dairy industry, and grateful for all the love and acceptance of my ‘little bear.’” Jacki can be contacted by phone, email or text ((802) 595-9866, jperkins@mofga.org). She is always ready to help MOFGA certified dairies be the best that they can be through the many resources available to her.
dec

Dec 7 • Kitchen Licensing Workshop
Common Ground Education Center, Unity
10 a.m. – 4 p.m.

jan

Jan 9–11 • Maine Agricultural Trades Show
Augusta Civic Center. Tuesday Jan 9th is the MOFGA Annual Meeting. Admission is free.

TBD • Charcuterie
with Andy Smith, Smith’s Smokehouse, Monroe

TBD • Grower’s Meetings
with Ag Services staff, multiple locations throughout the state.

feb

Feb 11 • Beginning Beekeeping with David Smith, Sparky’s Apiaries
Common Ground Education Center, Unity

Feb 25 • Advanced Business Planning with Julia Shanks
Coastal Enterprises, Inc., 30 Federal Street, Brunswick, Maine. Sunday, 9:30-5:00

mar

March 3 • Spring Growth Conference: Greenhouse Management
Common Ground Education Center, Unity. Unity. 10 a.m. to 4 p.m.

March 10 • Pruning Apple Trees
Workshops at multiple locations.

March 17 • Renovating Old Apple Trees
Workshops at multiple locations.

March 25 • Seed Swap & Scionwood Exchange
MOFGA’s Common Ground Education Center, Unity. FREE, no registration required.

March 10 • Pruning Apple Trees
Workshops at multiple locations.

March 17 • Renovating Old Apple Trees
Workshops at multiple locations.

March 25 • Seed Swap & Scionwood Exchange
MOFGA’s Common Ground Education Center, Unity. FREE, no registration required.

April 4 • Grow Your Own Organic Garden
Classes at adult education programs across the state!

April 7 • Grafting Fruit Trees
Workshops at multiple locations.

April 14 • Organic Orcharding 101
with Michael Philips, Common Ground Education Center, Unity

April 21 • Earth Day Work Day
Common Ground Education Center, Unity