In August of this year, Horizon Organic (owned by Danone), one of three wholesale organic milk haulers operating in Maine, sent non-renewal notices to all of its organic dairies in Maine. In addition, farms in New Hampshire, Vermont, and upstate New York also received notices. In all, 89 farms were issued notices of non-renewal. There are 846 certified dairy farms in Maine, New Hampshire, Vermont, and New York. Horizon offered a one-year contract to supply milk to them until August 31, 2022, at which point ten percent of the Northeast’s organic dairy farms will be without a market.

MOFGA is dedicated to its certified dairy producers, and is taking steps to fortify the future of dairy production in the region. We are partnered with Maine Department of Agriculture (DACF), University of Maine Cooperative Extension, Maine Organic Milk Producers (MOMP), Maine Dairy Industry Association (MDIA), Maine Farmland Trust (MFT), Land for Good, Maine Dairy Promotion Board, CEI, Wolfe’s Neck, and partners across the Northeast to assess the situation, and determine feasible courses of action for those affected, and the dairy sector as a whole.

This task force is taking a three-pronged approach, targeting immediate needs, medium-term food system projects, and longer-term sustainability for the region. Information gathered from affected farms highlighted some of the challenges they face, and the broader dairy community in Maine. The task force will be applying their three-pronged approach in these identified areas:

- **Retirement/succession**—this group’s starting focus is to help navigate these transitions in the most financially sound and equitable way possible.
- **Alternate Markets**—this group is looking to aid farmers in a position to diversify, or pivot their production strategies, and additionally navigate offers from alternate milk markets.
- **Financial Planning**—this group is poised to take a closer look at businesses to build sound strategies around their financial outlook.

MOFGA’s Organic Dairy Specialist, Jacki Perkins, is participating in all three working groups to provide farmer perspective, coordinate efforts, and be able to keep affected dairies apprised of our progress. If you feel your farm would also benefit from assistance within any of these categories, please reach out to MOFGA’s Farmer Programs team, or any of our partner organizations. We are all working together to better the future of Maine agriculture.

MOFGA is also in discussion with supply chain stakeholders including cooperatives and their field representatives, trucking companies, retailers, and in-state processors. We are visiting all of the affected dairies to offer support they may need in order to be picked up by another milk company or make desired changes to reach direct markets, diversify production, or retire.

Production and business technical assistance is available from MOFGA, including funding to work with external consultants on a wide range of projects.

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As we enter the dormant time of year, I’m reminded of the significant amount of work that goes into producing organic food in Maine and northern New England. While we have a shorter growing season than other areas of the country, there is no lack of effort that goes into setting the fall crops up for winter storage, or processors working to procure the last of the season’s bounty to feed our community through the colder months. Before we know it, producers are planning for next season, ordering seeds and fertility inputs, and mapping out where to procure ingredients or holding winter meetings with prospective buyers. While there may be some time to enjoy the quiet that winter brings, it’s a very limited off season if at all!

The team at MCS follows a similar timeline, shifting from the “inspection season” to planning for the next year, conferences and trainings, and setting up to launch the new year’s certification cycle in early January. We conduct the majority of our processor inspections during the winter and our maple inspections between March and April. Then it’s back to the farms, following the seedling process and holding meetings with prospective buyers. While there may be some time to enjoy the quiet that winter brings, it’s a very limited off season if at all!

You’ll see in this issue that the MCS team continues to be hard at work with running MOFGA’s certification program: following and commenting on national items of importance for MOFGA producers, digging in to support dairy producers in general and those affected by the Horizon withdrawal from the Northeast, and investing in our online portal to allow the majority of our renewing producers and applicants the opportunity to update or apply completely paperless. We recently received our re-accreditation audit by the USDA National Organic Program (yes, they “inspect” us too!), and we received high marks from the auditors for our program’s quality management system. They did flag some minor issues and improvements, and you’ll see in this issue where MCS plans to focus some attention on the information held within each producer’s Organic System Plan (OSP), to make sure it is complete and accurate. The OSP is what we certify to, and ensuring the OSP is accurate is an important component.

As we continue to build on the hard work of our past, and because MCS is required to have a “budget neutral” program within MOFGA, we made the difficult decision to modestly increase our fees beginning with the 2022 cycle. This increase will help to fund an additional position at MCS to assist our capacity in the inspection and review areas. We’ve included an article in this issue that describes some of the expense areas MCS incurs with the program’s administration, in the hope of providing our producers with additional insights about the overall work of certifying over 500 operations throughout Maine, New Hampshire, and Massachusetts.

We hope this newsletter is a resource for you and that you enjoy this issue’s articles and updates. We aim to provide you with the most up to date industry news, compliance guidance, and information to assist with your certified organic production. If you ever have any questions about our program, the organic regulations, or production, please do reach out. Our team is ready to respond!
Understanding the Impacts of COVID-19 on Our Food System
By Nicolas Lindholm, MOFGA Organic Business and Marketing Specialist

In 2021, MOFGA, Maine Farmland Trust, Coastal Enterprises, Inc. and Cooperative Development Institute, worked together to research and understand the impact of COVID-19 on our food system and map out a plan for transformational change. In particular, we set out to understand which COVID pivots are viable for the future and how we can build a more equitable and resilient local food system for the long term. Funded by the Sewall Foundation, this collaborative research project entailed separate surveys of three major constituencies within Maine’s food system (farmers, buyers, and consumers) and a personal interview process with leaders of underrepresented communities.

Consumer Survey
A total of 200 adults were surveyed in March 2021 to assess food purchasing trends and preferences for local food before and after the onset of the pandemic. There were 26 questions, covering socio-demographic information and pandemic impacts on socio-economic factors and food consumption habits.

Here are some key findings from the consumer survey:

- Overall, monthly household food expenditures decreased by 12% ($84 on average per household), and the number of shopping trips to acquire food dropped from 5 to 10 times per month down to 2 to 4 per month.
- Over half of the respondents intended to continue utilizing shopping options that were created as a result of COVID-19, including purchasing pre-bagged and packaged food items, purchasing food in bulk and visiting self-serve farm stands.
- Sixty percent of respondents planned to continue prioritizing locally sourced food in 2021, ranking local meat, poultry, vegetables and dairy in the order of importance.

Underrepresented Voices Interviews
The goal of this portion of the research was to include the voices and experiences of various underrepresented communities in Maine that may have been overlooked by the survey instruments. A total of 12 key informants were interviewed: interviewees self-identified as African and/or Arab immigrant community leaders; Black, Indigenous, people of color (BIPOC) community leaders; a youth community leader; a leader among those with disabilities, a state senator; and several who also identified as low-income community leaders. Leaders were asked to discuss their own observations of their communities and their own experiences during the pandemic, the impacts of COVID-19 and how it changed food shopping habits, and community needs from the food system in Maine moving forward.

Key findings from the underrepresented voices interviews include:

- Significant economic and psychological impacts were identified in many socially underrepresented communities, and the issues caused by COVID-19 could not be isolated to the food system and will require action and follow-up, not just research, to fully address.
- The pandemic exacerbated shortages in culturally important foods and exposed issues around access and affordability of fresh and local food.
- Federal relief efforts were seen as disproportionately awarded to white-led businesses and organizations.

Farmer Survey
A total of 50 farmers responded to a survey, representing 14 of 16 counties with an even split from District 1 (Southern Maine) and District 2 (the rest of the state). The survey included 23 questions, covering socio-demographic information and the effects of COVID-19 on farm employment, gross sales and market channels. The survey also asked farmers about threats facing their businesses and changes they made as a result of COVID-19, which pandemic relief resources they utilized, and what changes they’d like to see made for a more resilient food system.

Here are a few key findings from the April 2021 farmer survey:

- Total farm gross annual sales increased 12% ($483 thousand across the 50 farm respondents).
- Sales of farm products to other farms more than doubled (from $21 thousand in 2019 to $50 thousand in 2020, Fig.1) — and many farmers who bought from other farmers increased their purchases by 40% (average of $12 thousand increase per farm stand).
- The most common threats were issues relating to farm supplies and inputs, including issues in sourcing, increased expenses and having to purchase new types of supplies like personal protective equipment (PPE) and hand sanitizer.
- The most common changes that respondents made, that they intend to stick with, include increasing sanitation and food safety standard operating procedures (SOPs), accessing new markets, scaling up their production and increasing their donation of foods to pantries, etc.
- The most common desired change was for more access to grants that make farms more able to avoid, withstand or react to future threats to our food system (Fig. 2).
These might include infrastructure planning, preparing grant applications, grazing management, and business planning.

MOFGA, Maine Department of Agriculture, Conservation and Forestry, Maine Dairy Industry Association and Maine Organic Milk Producers are engaged with a regional group of stakeholders convened by United States Department of Agriculture Secretary Vilsack on several working groups that will make actionable recommendations to the USDA by the first week in December in the areas of farm viability, institutional purchasing, processing, distribution and logistics, and federal response.

The following set of demands we would like to see met were submitted by MOFGA to senior executives at Danone, to better ensure the future of our community members. This petition, signed by 2,214 stakeholders, was submitted along with a national petition signed by 13,020 farmers, organic consumers, advocates, and organizations.

- Extend contract termination to 18 months
- Make a large donation to the Northeast Dairy Business Innovation Center to be used for grants and technical assistance to farmers
- Provide emergency loans to farms
- Provide severance pay to affected farms
- Make an investment pledge to a group of farmers developing in state processing

The petitions request that Danone contact Sarah Alexander of MOFGA no later than November 5th, 2021, to meet and discuss Danone North America’s commitment to family dairy farms, rural communities, and meet their social mission commitments as a B Corporation with the following stakeholders:

- Nicole Dehne, Certification Director, Northeast Organic Farmers Association of Vermont
- Bethany Wallis, Executive Director, Northeast Organic Farmers Association of New York, Inc.
- Sarah Alexander, Executive Director, Maine Organic Farmers and Gardeners Association
- Ed Maltby, Executive Director, Northeast Organic Dairy Producers Alliance
- Jill Smith, Executive Director, Western Organic Dairy Producers Alliance
- Kate Mendenhall, Executive Director, Organic Farmers Association
- Abby Youngblood, Executive Director, National Organic Coalition
- Melody Morrell, Executive Director, Cornucopia Institute
- Dave Chapman, Co-Director & Founder, Real Organic Project

In addition, on October 25th, 2021, Congressional Representatives Chellie Pingree (D-ME), Jared Golden (D-ME), Peter Welch, (D-VT), and Annie Kuster, (D-NH) sent a letter to chief executives of Danone regarding the company’s decision to terminate its contracts with 89 organic dairy farms in Maine and across the Northeast. “By all accounts, your decision to sever the contracts of these 89 farms was one based solely on maximizing profits, regardless of the devastating consequences for the families and communities you cast aside and despite the reputational benefits and profit you gleaned from their work,” the letter read. “Clearly, your 2020 corporate revenue of $27 billion was not enough.” They added, “Your actions against these Northeast farmers are in direct conflict with the B Corp commitment of ‘balancing profit with purpose’ and ‘using business as a force for good. We ask that you choose to live the values of the B Corp commitment and reinstate the contracts of these 89 farms, who have been a force for good in their communities and a source of profit for you.”

We are sending periodic updates to all MOFGA certified dairies as we see this crisis as an opportunity to leverage resources that can benefit and stabilize all Maine dairies. If you have questions or need support, contact Organic Dairy Specialist Jacki Perkins at iperkins@mofga.org or (802) 595-9866.
New Fee Schedule for 2022 and Costs of Administering the MOFGA Certification Program

MOFGA Certification Services (MCS) faces the perennial challenge of aligning our certification fees (and keeping them low) with our programmatic and operating expenses. We are required by our parent company, MOFGA, to generate an amount of revenue equivalent to our expenses, thereby keeping the certification program “budget neutral.”

Increasing program and operating costs have led to a decision to institute a modest fee increase across our fee schedule for the 2022 cycle, with the lowest two categories ($0-$10,000) seeing the smallest increase. Our intent is to maintain the certification fee as a percentage of income and keep it as equitable as possible across the different income categories. MOFGA has advocated for getting the federal cost share restored to its previous level of 75% up to $750 per scope, and we were pleased to see the announcement by USDA on November 4, 2021, that they have opened up the $20 million funding allocated by Congress to make the cost share whole again for the years 2020-2022. MCS has learned that the OTECP funds are being administered by county FSA offices. A toolkit for producers can be found here: https://www.farmers.gov/pandemic-assistance/otecp.

While MCS does, for the most part, cover its expenses with regard to review and inspection activity, there are significant costs associated with running the program, such as regulatory and personnel, that fall outside of this. Areas within our operation that have seen significant cost increases in the past few years include IT, residue sampling and unannounced inspections, staff capacity due to increased regulations, required NOP audits and mandatory staff trainings.

For example, MCS spends roughly $18,000 per year paying for database and website hosting, contracted services, and licenses to securely hold the data required to certify each operation.

All accredited certifying agencies are required by the National Organic Program (NOP) to conduct pesticide residue sampling and unannounced inspections of 5% of our certified operations (around 30/year x 2 = 60 total). These costs are borne by MCS and are not charged to the operations. Each residue sample costs MCS between $300-$450 depending on the lab test, plus the cost of shipping perishable samples at over $100 each. We also reimburse staff and inspectors the cost of mileage at the federal rate, whether it is the annual inspection for an operation, or these additional inspection activities associated with residue sampling, unannounced inspections and additional inspections used to follow up on complaints or high-risk operations.

MCS Adds New Production Supplements to Online Portal

MCS is pleased to announce that we are investing significantly in our online application and update portal system by adding seven production supplements to our online system for the 2022 cycle. Supplements planned to be added are:

- Sea Vegetable Supplement and Production Unit Form
- Poultry Supplement
- Mushroom Supplement
- Wild Crop Harvest Supplement
- Maple Syrup Supplement
- Hemp Supplement

In addition, MCS is poised to invite new applicants to use the online system to complete applications. We will offer crop, maple, processor/handlers, sea vegetables, and poultry-based applicants the opportunity to use our paperless application system!

We anticipate having the funds to add the Livestock Supplements (Ruminant, Non-Ruminant, Dairy) to the online system for the 2023 cycle, to align with our goals of becoming as paperless as possible with our certification services.
Understanding the Impacts of Covid-19 on our Food System

(continued from Page 3)

Here are some of our project’s main conclusions:

• One of the most significant changes that happened during the pandemic was farmers selling more products to other farmers for resale — it was apparent that a cross-section of farms, likely with some kind of geographic or infrastructure capacity advantage, were able to increase their purchasing and marketing of product for other farmers.

• The utilization of e-commerce and online marketing increased with both farmers and buyers, with a high level of expectation to continue this long term, which matches consumer’s interest in increased utilization of online ordering and continued use of home food delivery.

• Both farmers and buyers increased their food safety and sanitation practices, including the use of packaged and pre-bagged items, which matches consumers’ interest in continuing to purchase pre-bagged and bulk items.

• Farmers told us they need more access to grant funding. Farmers and buyers accessed emergency funding primarily from the federal government (like PPP and EIDL) and found these grants to be an important source of resiliency for their businesses. It is important to note, however, that underrepresented stakeholders reported being unable to access this funding.

• For equitable access, local food needs to be culturally appropriate, affordable and available.

• Leaders from communities of underrepresented voices expressed that food system needs were inextricably linked to accessing child care, support for frontline workers and language justice.

Our full report, which should be available to the public by the end of the year, will include a full assessment of our conclusions, recommendations for action, a listing of existing resources, links to our data as well as similar surveys, and further discussion on our methodology and the survey and interview questions themselves.

Buyer Survey

A total of 22 respondents from Maine food businesses provided responses to a survey on pandemic impacts and local purchasing, representing all 16 counties fairly evenly across the state. The survey was intended for food buyers of all types: retail food stores, distributors, farm stands, institutions and restaurants. The buyer sample was not large enough to provide generalizable results, however it provides insights into the experiences of the participants.

Here are some key findings from the June 2021 buyer survey:

• There was variation in buyers’ ability to successfully acquire as much local food as they were wanting, with about 60% being successful while about 40% were not able to buy as much as they wanted.

• The most common changes made by respondents were in utilizing e-commerce, namely adding or expanding online and social media marketing.

• The top immediate concerns were those regarding employees, including staff safety, lack of an adequate labor pool for hiring and increased expenses for sanitation and SOPs.

• The most common desired changes had to do with the supply chain and include a desire for shorter supply chains, more suppliers of local products and improvements in technology to allow more efficient ordering and purchasing from multiple, small local suppliers.

Conclusions

The survey responses give us some indicators of how Maine’s food system is being affected by COVID-19. Yet, since the rate of transmission is still high and the pandemic is far from over, we perceive that it’s too soon to draw any conclusions about how the food system may have changed in the long term. Moving forward, we think this research must take a more longitudinal approach to test some of the assumptions about 2021.
MCS Updates Hemp-Derived Products Policy

In October of this year, MCS updated our Hemp-Derived Products Policy based on current FDA precedent and legal review. In short, MCS has expanded the types of products that are hemp derived (hemp oils, CBD, etc.) and now eligible for organic certification. These are namely retail labeled products that MCS had not previously certified, based on the FDA messaging around products containing CBD. The following is excerpted from the full policy, which can be viewed here:


MCS’s certification of hemp-derived products is informed by existing policies and interpretations from other accredited USDA organic certifiers, as well as the current precedent within the marketplace. Despite the FDA’s past press releases and public facing statements regarding the legality of CBD in food and

Hemp Update (cont’d)

as dietary supplements, FDA has chosen not to pursue regulatory action for products appropriately labeled (no misleading claims) as dietary supplements containing CBD in retail products.

MCS takes the following approach to certifying hemp-derived products until further notice.

MCS will certify as organic the following (under the NOP crop scope):
- hemp plants (including harvest and post-harvest handling consisting of drying/curing)
- hemp seeds
- hemp seedlings

MCS will certify as organic the following (under the NOP handler scope):
- bulk and retail packaged hemp oil
- bulk and retail packaged tinctures
- other bulk and retail packaged extractions
- certifiable products containing hemp oils, extracts, CBD, etc.
- topicals

MCS will not certify as organic the following:
- hemp pre-rolls (due to “paper” not currently allowed on the National List)

MCS will not certify any bulk ingredient hemp extraction that has been processed in a non-certified lab or facility—the organic regulations do not allow this for any product marketed as certified organic. The lab or processing facility must be certified organic.
CATTLE CORNER

Strategies for Managing Dairy Bull Calves

by Jacki Martinez Perkins, Organic Dairy and Livestock Specialist

As recently as 2020 dairy farms have come under fire for their management of bull calves. There have been news stories of farmers euthanizing bull calves directly after birth. A May 2019 article in the Journal of Dairy Science entitled *Management of preweaned bull calves on dairy operations in the United States* [https://www.sciencedirect.com/science/article/pii/S0022030219302115](https://www.sciencedirect.com/science/article/pii/S0022030219302115) focuses on three main areas of welfare for dairy bulls as compared to heifers: colostrum management, dehorning and castration procedures, and pain mitigation practices. The conclusions drawn by the study is that bull calves are, quite often, not afforded the same level of humane handling that their sisters receive.

MOFGA Certification Services (MCS) encourages necessary physical alterations to be performed at the youngest age possible, and with the use of analgesics and anesthetics. All procedures need to be outlined in producers’ Organic System Plans (OSP), and fully documented in their herd health records. The American Veterinary Medical Association (AVMA) advises the use of anesthetics (lidocaine) and NSAIDs (aspirin) when performing castrations and disbuddings, both of which are encouraged in organic production, with appropriate withholding times. Every farm has a different strategy for managing bull calves, and it can largely depend on demand in the market, and the ratio of bulls to heifers a farm has in any given year. What we are trying to avoid is neglect or mistreatment of any living creature, and there are some strategies that have worked well for Maine’s organic dairy farms.

**Artificial Insemination**

Some farms rely on artificial insemination (AI) to maintain replacement numbers. This allows a wide variety of choices to individual producers. Strategies such as using sexed semen when breeding highly valued cows increases the chances of carrying forward desired family traits from dam to daughter. For less desirable genetic profiles, it can be advantageous to use beef semen. These calves, regardless of sex, have been commanding good market value, even as young stock. However, depending on the size of the dairy herd, and the amount of calves being produced each year, a number of these animals could potentially remain on the farm until maturity, and enter the local beef market, rather than being transported out of the state as calves. It is worth noting that AI doesn’t work well on every farm, in which case a different management practice should be followed.

**Keeping Different Bulls**

Another strategy would be to keep one bull of the farm’s desired breed and genetic quality, and a second “clean up” bull, usually a beef breed of some kind. The black angus and hereford breeds have been selected over the last 40-50 years for low birth weights, but fast weight gain, since ranchers often raise herds out on the range, and calving and vitality issues can be bad news out in the wild. These bulls are ideal for use in first calf heifers, and any production age cows whose performance hasn’t proven adequate for a farm’s particular production goals. Again, choosing this “clean up bull” option allows for desirable genetics to remain on the farm, while still managing a higher market value for stock leaving the farm. For any purebred breedings that end with a bull calf, farms might consider entering into contracts with area farms to supply breeding bulls and a diversity of genetics for farms not partaking in AI. It is strongly recommended to maintain polled genetics.

**Direct Marketing**

There are farmers who excel at making deals, and are able to find local homesteaders to take well-started bull calves. This often requires care with administering colostrum, disbudding, castration, and some extra time in the herd until the homesteader is ready, but can often pay off in the form of mutually advantageous barter negotiations. This also seems to work for those farms managing lower herd numbers.

Whichever method is working on your farm, it is always worth considering the animal welfare aspect. Organic certification standards dictate that livestock be allowed to move and act in natural ways. This is leading to a redirection of how dairy farms have traditionally managed calf housing and feeding. While there are health reasons to separate calves from dams at birth, there’s copious amounts of evidence that group housing and frequent feedings only benefit a farm’s production in the long run. There’s even a school of thought that when calves are group housed, it reduces the likelihood of rogue cows and bulls that injure and kill humans, since they can learn normal cattle behavior and social structure from each other, rather than targeting their human caregivers as tiers in the pecking order.

If dairy wants to remain relevant in a market filled with plant-based options, we have to stop and consider what our traditional management practices look like to a population two generations removed from animal agriculture. Additionally, if we want to maintain a quality product, it comes from well-managed livestock. Pain and stress always reduce the gains that keep livestock production profitable.
National Organic Standards Board Meeting Recap

The National Organic Standards Board (NOSB), the volunteer advisory board to the USDA National Organic Program (NOP), held its bi-annual meeting (virtually) on October 19-21, 2021. The full board is made up of fifteen seats and is a crucial component of the National Organic Program. Information about the NOSB, members and this meeting's content and voting results can be found on the USDA website: https://www.ams.usda.gov/rules-regulations/organic/nosb.

The meeting agenda included several important discussion documents and votes important to MOFGA certified producers, along with discussion of a number of materials on the National List of Allowed and Prohibited Substances that were up for sunset review. All meeting transcripts, votes, etc. can be found about a month after the meeting at the link above. The sunset review process that the NOSB undertakes is whether to re-list or de-list existing items. If something is voted to be de-listed, this generally means that the board has determined that the product is no longer in use or is needed, or that there is enough commercial availability of the product in certified organic form. All votes of the board are “recommendations” to the NOP which need to be moved forward through rulemaking.

The meeting began with presentations by Jenny Lester Moffit, USDA Deputy Under Secretary of Marketing and Regulatory Programs, and Dr. Jenny Tucker, USDA NOP Deputy Administrator. Ms. Moffit discussed the Biden administration’s Build Back Better agenda as it relates to organic agriculture, noting the program earmarks $200 million for transition assistance as well as increased funding for organic research related to climate change mitigation. Dr. Tucker outlined the program’s priorities, including finalizing the Strengthening Organic Enforcement (SOE), Origin of Livestock (OOL), and Organic Livestock and Poultry Practices (OLPP) final rules. She noted they were all written and being reviewed, with the hope that the proposed final rules be published in the spring of 2022. The OOL was originally released as a proposed rule in 2015 and aims to close the loophole of continuous transition in the current regulations, a major issue in the dairy sector which has created an unlevel playing field based on this allowance by some certifiers.

Livestock Subcommittee
The committee reviewed, via discussion documents and public comments, several National List items to determine if they should be de-listed. The board voted not to de-list any items ahead of the 2023 sunsets. These included: zinc sulfate, sodium chlorite (acidified), propylene glycol, nutritive supplements, mineral oil, kaolin pectin, activated charcoal, calcium borogluconate, calcium propionate, and all of the chlorine materials listed in 205.603.

Crops Subcommittee
There were two major items on the subcommittees list for this meeting: ammonia extracts and biodegradable bio-based mulch film. In addition, the board voted to re-list sodium nitrate, which currently has an outdated listing due to inaction by the NOP. The board voted unanimously to re-list sodium nitrate at 205.602 (prohibited nonsynthetic) so it could go through the proper sunset process.

Ammonia Extract was proposed to be prohibited in organic production by the NOSB, due to the continued use and the fact that this type of production is not aligned with the Organic Foods Production Act (OFPA). MOFGA, MCS, and our allies argued in comments that there are better ways to achieve a plant’s nitrogen needs from soil than using high-nitrogen sources, and “feeding the soil, not the plant.” There is consensus in the organic community to prohibit or highly restrict its use, though this is vehemently opposed by input manufacturers. After significant discussion, the board voted in three parts on this proposal: classify ammonia extracts as nonsynthetic (motion passed), add ammonia fertilizers sourced as stripped ammonia and concentrated ammonia to 205.602 (j), prohibited nonsynthetic (motion passed), and add nitrogen products at 205.203 to only allow products with a C:N ration of 3:1 or less, including blended fertilizers (motion to send this portion of the proposal back to subcommittee, motion passed).

A proposal to change the existing annotation for biodegradable bio-based mulch film (BBMF) was discussed at length, and the board voted to change the current BBMF annotation from 100% bio-based to 80% bio-based, with a 10-4 vote. MOFGA and MCS submitted comments opposing the reduction in bio-based content due to lack of research, especially if tilled in year after year, resulting in a buildup of microplastic content in the soil.

Additional sunset votes and petitions occurred at this meeting, including proposals to add chitosan to the National List for plant disease control (motion failed), cow manure derived biochar (motion failed), kasugamycin (motion failed), hydronium (motion failed), carbon dioxide for irrigation system cleaning (motion passed to send this back to subcommittee), and lithothamnion to classify as a “wild crop” (motion failed, determined to be nonagricultural). All other applicable sunset listings failed to be removed from the National List.

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In the days after the decision to not hold the in-person Common Ground Country Fair, MOFGA got busy reaching out to all our Fair farmers, food area vendors and producers to assess who needed help finding alternative markets for products that were made or grown for the Fair. We have been absolutely committed to helping our farmers, food vendors and producers while also ensuring that no food went to waste.

Out of the over 80 calls made and emails sent, we heard from eight farmers, food vendors and processors that had large volumes of food to sell and wanted our help finding alternative markets. For those requesting help, we sent descriptions of their products to a number of farmer and wholesale listservs, over 240 Portland-area restaurants, numerous personal contacts, Maine Farm to School Network, Maine Farm to Institution Network and other local and state-wide distributors and markets. We have continued our outreach and shared ideas to find alternative markets where needed to ensure the farmers and food producers that requested help were served and their excess perishable product destined for the Fair found a new home.

We are also grateful that a bill passed by the Maine Legislature and signed into law this summer (LD 636, An Act To Encourage the Purchase of Local Foods for Public Schools) expanded the offerings available for the Local Food Fund by matching $1 for every $3 that a School Administrative Unit (SAU) pays for locally grown or produced foods purchased directly from a Maine producer or producer’s cooperative. This bill helped support a collaboration between a Fair farmers’ market vendor, the Maine Farm to School Network and the Maine Department of Education, that resulted in hundreds of pounds of Maine-raised organic meat being served to children in Maine schools.

We have already started working on the 2022 Common Ground Country Fair and are always on the lookout for new and returning vendors. The first Fair application of 2022, for food vendors, will be open from mid-November until December 31, 2021. The Farmers’ Market application will follow close behind, opening in mid-January, 2022. If you are interested and would like to apply and/or have questions, please contact either Wendy Watson, Fair Food Liaison: wwatson@mofga.org or Meg Nadeau, Fair Coordinator: mnadeau@mofga.org. We look forward to seeing you in 2022!

Organic System Plan (OSP) Points of Emphasis for 2022

In early October MCS underwent a re-accreditation audit by the USDA National Organic Program (NOP). Over all we received high marks from the audit team, but there were minor issues flagged that MCS will have to correct. Auditor reviews of several of the producer files noted that certain responses to questions posed in the various OSPs were incomplete, outdated, or not responded to at all.

This list represents specific areas of the OSP that MCS will be paying particular attention to as we review 2022 renewal updates and applications and complete onsite inspections. MCS will be striving for “a complete OSP” prior to assigning an inspector to an operation, and will be asking inspectors to verify all aspects of the OSP during the onsite inspection.

• Dairy and Ruminant Livestock— dry matter demand (DMD) calculations must be accurate in the OSP so that the inspector is able to verify feed and rations at the time of the onsite inspection; Dry Matter Intake (DMI) will be verified by class of animal as well.
• Dairy and Ruminant Livestock— the inspector will verify that records demonstrate temporary confinement was in fact temporary.
• Poultry—calculations to determine compliance with the National List restriction for synthetic DL-methionine, based on overall consumption over the life of the flock, must be demonstrated.
• All operations—natural resources and biodiversity questions, must be answered and verified at the inspection to comply with this requirement of the regulations.
• All operations—traceability exercises and mass balances will be completed at the onsite inspection for all operations (including applicants who may not have harvested any crops), to demonstrate compliance with recordkeeping requirements.
• All operations—MCS may issue Notices of Non-Compliance where an operation is found to have repeat issues that were “conditions for certification” and have not been corrected. The Notice of Non-Compliance requires the operation to submit a corrective action plan, it does not impact overall certification and is deemed to be correctable and may not affect certification status.
Methionine Use in Organic Poultry Production
An MCS Policy Piece

What is Methionine?
Methionine is an essential amino acid that is naturally occurring in insects and plants. Poultry feed processors often add synthetic methionine to a ration as a way to meet the demand for this amino acid without increasing protein levels.

The National Organic Program
(NO)P Rule 205.603(d)(1) applies to the use of methionine in organic poultry production. Synthetic methionine is allowed in organic poultry production at a maximum average intake (pounds per ton) over the life of the flock. The life of the flock begins with organic management, which must begin no later than the second day of life.

DL-Methionine, DL-Methionine-hydroxy analog, and DL-Methionine-hydroxy analog calcium (CAS Numbers 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

How will MCS verify compliance?
If the feed company you use follows a standard formulation with added synthetic methionine at, or under, the maximum allowed pounds per ton, the average methionine consumption over the lifespan of the flock will be in compliance. This must be detailed in your Organic System Plan (OSP) and documentation showing how this was verified must be available at inspection. Documentation may include a statement from your feed supplier stating the amount of methionine added to the ration.

If at any time over the lifespan of the flock, feed exceeds the allowed synthetic methionine pounds per ton, calculations must be provided by the producer to show the average methionine consumption is below the maximum amount allowed per 205.603(d)(1). Calculations must be included in the Organic System Plan and will be reviewed at inspection. Please see numbers 1-3 below and the calculation table for examples. Enter information into the table to determine average methionine consumption for your flock.

Layer operations that purchase pullets from certified operations must provide MCS with documentation to verify synthetic methionine average intake over the lifetime of the flock. This may be a statement from the feed supplier (if under the maximum allowed pounds per ton) or feed ration calculations.

Changes to the 2022 Poultry Supplement will include a question asking for the amount of 100% Synthetic Methionine in each feed ration. If the amount exceeds the maximum amount allowed per 205.603(d)(1) calculations must be submitted to show the average methionine consumption over the lifespan of the flock.

How to calculate the average consumption of 100% Synthetic Methionine
Remember that this is only necessary when the synthetic methionine in a ration exceeds the amount allowed per 205.603(d)(1).

1) Determine the pounds per ton of 100% Synthetic Methionine for each feed formula.
Depending on how your feed supplier reports this information, it may be described as pounds per ton or as a percentage. Sometimes, grain suppliers will include both synthetic and natural sources of methionine on the feed tag. NOP rule 205.603(d)(1) only discusses restrictions of synthetic methionine, so it is critical to determine the amount of synthetic methionine only. If the synthetic methionine is not concentrated at 100%, the actual concentration is factored into the calculations. For example:

A farmer receives 1500 pounds of broiler crumble and the grain slip states the feed contains 0.6% methionine. The farmer contacts the grain supplier to ask how much synthetic Methionine is added to the feed ration. The grain supplier provides documentation that the added synthetic methionine is 0.05% and it is concentrated at 92%

<table>
<thead>
<tr>
<th>Percentage Methionine in Feed</th>
<th>Lbs Methionine Product per ton of Feed</th>
<th>% Synthetic Methionine in Methionine Product</th>
<th>Adjusted Synthetic Methionine (100%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>%</td>
<td>Lbs Meth/Ton Feed (%/100*2000)</td>
<td>(fraction) (=% conc. syn meth/100)</td>
<td>Lbs Syn Meth/Ton Feed (0.92*5.0)</td>
</tr>
<tr>
<td>0.05</td>
<td>1</td>
<td>0.92</td>
<td>0.92</td>
</tr>
</tbody>
</table>

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MOFGA's Newsletter for Organic Producers  Fall 2021

Methionine Use in Organic Poultry Production  (continued from Page 11)

2.) Taking into account each different type of feed fed over the lifetime of the flock (eg. starter, grower, finisher) calculate the weighted average of 100% synthetic methionine per ton of feed. For Example:

A farmer feeds their typical ration of chick starter and broiler grower for the first 6 weeks of the flock's life. After running out of chicken ration, the farmer feeds turkey grain as a finisher. The table below demonstrates the calculations and shows how the farmer exceeded the maximum allowed amount of synthetic methionine per 205.603(d)(3).

<table>
<thead>
<tr>
<th>Feed Formula</th>
<th>Age of Birds</th>
<th>Days</th>
<th>Feed Rate (per day)</th>
<th>Total Fed - Lb (ton)</th>
<th>Synthetic Methionine Lbs/Ton</th>
<th>Total Synthetic Methionine over time period Lbs</th>
</tr>
</thead>
<tbody>
<tr>
<td>1- Chick Starter</td>
<td>0-2 weeks</td>
<td>14</td>
<td>20 bs</td>
<td>280 (0.14 ton)</td>
<td>2.43</td>
<td>0.3402</td>
</tr>
<tr>
<td>2 - Broiler Grower</td>
<td>3-6 weeks</td>
<td>28</td>
<td>35 lbs</td>
<td>980 (0.49 ton)</td>
<td>2.43</td>
<td>1.1907</td>
</tr>
<tr>
<td>3 - Turkey Grower</td>
<td>week 7</td>
<td>7</td>
<td>80 lbs</td>
<td>560 (0.28)</td>
<td>2.91</td>
<td>0.8148</td>
</tr>
<tr>
<td>Total Days</td>
<td></td>
<td>49</td>
<td></td>
<td>1820 lbs (0.91 ton)</td>
<td></td>
<td>2.3457 lbs</td>
</tr>
</tbody>
</table>

Average = total lbs methionine/ total tons of feed

2.5776 lbs per ton

Please note: The above table contains corrections to the table which initially appeared in the printed and online versions of The Organic Sprout.

National Organic Standards Board Meeting  (continued from Page 9)

Materials Subcommittee
The subcommittee did not have any petitions or National List sunset items to discuss at this meeting, and instead focused on two discussion documents: 2021 research priorities and excluded methods. The board unanimously voted to accept the 2021 research priorities.

The continued excluded methods discussion focuses on the ongoing work of the board, beginning with recommendations in 2016, to identify new and emerging technologies, define them, and develop criteria for evaluating allowance in organic production. Definitions include genetic engineering, GMO, modern biotechnology, synthetic biology, non-GMO, and classical/traditional plant breeding. The discussion also included the principles and criteria used to evaluate as well as adoption of the terminology chart used by the board and NOP over time. This area will continue be on the board’s ongoing agendas, with proposals and/or votes slated for the April 2022 meeting.

Handling Subcommittee
The board voted on the petition to add Zein to the National List (motion failed), and Zein is no longer on the NOSB’s work agenda. In addition, the board voted to change the current annotation for fish oil to include “sourced from fishing industry by-product only and certified as sustainable against a third-party certification that is International Social and Environmental Accreditation and Labeling (ISEAL) Code Compliant or Global Seafood Sustainability Initiative (GSSI) recognized.”

All sunset items in the handling category failed to gain enough votes to be removed from the National List. Carrageenan, which has come under scrutiny of late by human health advocates, remains on the list with a 9-5 vote of the board.

Board Officers
The board voted on the new slate of officers for the upcoming year, with Nate Powell-Palm as the chair, Mindee Jeffery as vice-chair, and Kyla Smith as secretary.

For more information about the meeting materials, final vote tallies and next steps, please visit https://www.ams.usda.gov/event/national-organic-standards-board-nosb-meeting-sacramento-ca.

The next NOSB meeting is scheduled for April 26-28, 2022 in Crystal City, VA. Information about this meeting can be found on the NOSB meetings page https://www.ams.usda.gov/event/national-organic-standards-board-nosb-meeting-crystal-city-va-1.
As farmers we all acknowledge the benefits and challenges of manure application and storage. Poorly handled manure can create challenges to food safety and water quality in the form of unwanted bacteria, pathogens, and increases in fly populations. However, well-managed manure and pasture systems that maximize our natural ecosystems can greatly benefit pastures, animal health, and farm fertility.

In a recent MOFGA Fact Sheet, Manure Management from Facility to Field, strategies around storage and pasture management are explored. Included are studies on livestock behavior and how to integrate manure handling facilities with ease, as well as storage design and capacity projections. We outline some reasons for composting manure, or choosing not to. There’s also a comprehensive discussion on the interconnection between healthy dung beetle activity and pasture management, and how these can maintain manageable levels of harmful parasites, pathogens, and flies.

Dear Certification Specialist...

When I was completing my organic system plan this season, the last question in the farm plan asks about what conservation practices are used on my farm. Why is MOFGA Certification Services asking about this? I have a hard time answering this question!

The USDA National Organic Program (NOP) requires that certified organic operations maintain and improve the natural resources on their operations (7 CFR § 205.200). It defines “natural resources of the operation” as the “physical, hydrological, and biological features of a production operation, including soil, water, wetlands, woodlands, and wildlife.” “Organic production” is defined as a “production system that is managed to respond to site-specific conditions by integrating cultural, biological and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.”

MOFGA Certification has designed this section of the farm plan so that farmers can easily explain the strategies being used to maintain and improve the natural resources of their operations. The check boxes include conservation practices in the areas of preservation and development of wildlife habitat, erosion control, and enhancement of biological diversity. When completing the question, think about everything that is happening on your farm. Are you planting winter cover crops? Make sure to also check that that means you are trying to minimize erosion. Are you planting hedge rows? Make sure to check that those are songbird habitats, for instance.

Our inspectors observe your efforts to maintain or improve the natural resources of your operation and if there are any issues, will note them in their inspection report.

There are many different resources out there to help you implement a conservation strategy for your farm. Here are some to get you started:

- **NOP 5020 Guidance Natural Resource and Biodiversity conservation** explains the background and the policies and procedures regarding Natural Resources and Biodiversity conservation.

- **Biodiversity Conservation: An Organic Farmer’s Guide** is a Wild Farm Alliance publication which provides a range of farm management practices that maintain and enhance biodiversity.

- **The natural resources Conservation Services** The NRCS EQIP program provides financial and technical assistance to agricultural producers to help plan and implement conservation practices on their organic farms.

- **Farming for Bees** outlines ways to protect and enhance habitat for native crop pollinators in the farm landscape. This publication contains a wealth of information about common groups of native bees, their habitat requirements, and conservation strategies to increase their numbers on farms.

Dear Certification Specialist...

By Jacomijn Schravesande-Gardei, Associate Director of Crops

The Power of Poo

by Jacki Martinez Perkins, Organic Dairy and Livestock Specialist

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USDA Introduces New Insurance Policy for Farmers Who Sell Locally

In early October the U.S. Department of Agriculture (USDA) announced a new insurance option specifically for agricultural producers with small farms who sell locally. The new Micro Farm policy simplifies record keeping and covers post-production costs like washing and value-added products.

USDA's Risk Management Agency (RMA) created this new policy based on research directed by the 2018 Farm Bill, and it includes feedback from producers who grow for their local communities. The policy will be available beginning with the 2022 crop year.

The Micro Farm policy is available to producers who have a farm operation that earns an average allowable revenue of $100,000 or less, or for carryover insureds, an average allowable revenue of $125,000 or less. The policy builds on other RMA efforts to better serve specialty and organic crop growers. For more information: https://www.rma.usda.gov/News-Room/Press/Press-Releases/2021-News/USDA-Introduces-New-Insurance-Policy-for-Farmers-Who-Sell-Locally

Upcoming MOFGA Events

**Kitchen Licensing Workshop**—December 2, 2021, 9:00-12:15 pm. Online

**Livestock Management Strategies**—Before and After Pregnancy. January 5, 2022, 5:00-6:30 pm. Online.

**Fruit Tree Pruning**—March 12, 2022, 9:00-12:00 pm. Various locations statewide.

**Bringing Back an Old Orchard** (Pruning Older Trees)—March 20, 2022, 9:00-12:00. Various locations statewide.

**Seed Swap and Scion Exchange**—March 27, 2022, 12:00-4:00 pm. MOFGA in Unity.

For the full calendar of MOFGA events visit: https://www.mofga.org/event-calendar/

**Annual Events**: https://www.mofga.org/trainings/annual-events/

**Farmer Training Programs**: https://www.mofga.org/trainings/farmer-training-programs/

**Low Impact Forestry**: https://www.mofga.org/trainings/low-impact-forestry/

**Orcharding**: https://www.mofga.org/trainings/orcharding/

**Gardening**: https://www.mofga.org/trainings/gardening/