



The Organic Sprout

MOFGA's Newsletter for Organic Producers

Organic Certification During the COVID-19 Pandemic

by Chris Grigsby and Corinne Wesh

We want to acknowledge the extraordinary times we are all currently living in, as well as the multitude of challenges that many in the agricultural and food production sectors are facing during the COVID-19 pandemic. You—our producers—have shared many of the strains being placed on your operations with MCS staff—labor shortages, supply chain snags, day-to-day operational hurdles, financial upheaval. Our thanks go out to all of you for your adaptability and resilience in keeping the organic supply chain moving in spite of the obstacles presented by this pandemic!

MCS has also been working hard to keep our work moving forward and to support the continued certification of your organic operations as well as the health of the community. In response to the pandemic, MCS will be rolling out temporary contingency regulatory activities that facilitate the expansion of organic markets and uphold our regulatory responsibilities with the USDA-National Organic Program.

The USDA-National Organic Program has been clear with accredited certifiers like MCS that there can be no shortcuts to verifying the compliance of our organic producers; inspections and oversight must go on. To that end, we have been working to adapt our regulatory activities to the demands of the pandemic and to develop creative strategies for continuing to verify the organic integrity of MCS certified farms, facilities, and products while keeping everyone involved safe.

Earlier this Spring, in conjunction with the Accredited Certifiers Association (ACA) and the International Organic Inspector Association (IOIA), MCS and certifiers from across the country developed contingency plans to facilitate the process of organic certification during the epidemic. The NOP rules dictate regulatory practices that often depend on face-to-face interaction, so the group built an alternative and temporary framework for these activities that provides a consistent approach to organic certification and prioritizes public health.

These NOP-approved guidelines are the basis for the temporary alternative inspection methods MCS will be using this season to support the well-being of our clients and our inspectors, while also upholding our regulatory responsibilities dictated by the USDA-NOP program.

Please keep in mind that NOP rules have not changed and still apply to all certified operations:

- Your operation must submit updated Organic System Plans and applicable fees 205.400(b) and 205.406(a)
- Your operation must be inspected annually 205.406(b)
- Your operation must permit inspections 205.400(c)
- Your operation must report any changes to your Organic System Plan to the office, including new fields, facilities, materials, or processes 205.400(f)(2)
- Your operation must make records available for inspection during normal business hours 205.103(c)

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Annual Inspections

This year, MCS will be relying on a few temporary inspection practices to make sure we are supporting the health and safety of our clients and inspectors during the pandemic. *Our aim is to return to traditional inspection methods as soon as possible, but that decision will depend on the state of public health.*

Depending on the particular needs of your operation, your inspector may request one or more of the following modified inspection methods for your inspection:

- **Desk audit:** Records are requested by the inspector and sent by the operation for a compliance review. Records may be sent digitally or by post, depending on the needs of the operation. The inspector will report the findings of the review to the operation for follow up discussion, if necessary.
- **Virtual Inspection:** For renewing clients with the technological capability, it may be possible in some cases for video conferencing platforms to be used to tour facilities, review records, and observe your organic operation.
- **Un-hosted site visit:** With written permission from the operation's authorized representative, an inspector will tour an organic operation alone (un-hosted) and communicate with the operation about any questions or findings.

We recognize that the logistics of each inspection scenario may present unique challenges to the inspection process. MCS will strive to make the process as efficient as possible.

We appreciate your patience with MCS inspectors as they navigate this new regulatory terrain with you, and ask for your support by providing prompt and clear communication when arranging

your inspection and throughout the process. Please provide MCS and your inspector with pertinent details about measures your operation has put into place during the pandemic.

Adding new fields or facilities to existing organic operations

If you are currently certified and thinking about adding new fields, facilities or processes to your Organic System Plan, please do not wait to notify our office. Remember that any new fields must be approved and inspected prior to organic harvest, and organic production facilities must be approved and inspected prior to the start of organic production. Such products cannot be certified retroactively, even during this pandemic.

To get the process rolling, contact your certification specialist or simply call the MCS office so we can direct your request to the right staff person. We will work with you to create a plan that keeps everyone safe and healthy—and supports your operation's needs.

Other changes to your Organic System Plan

If your operation needs to make a change to your Organic System Plan, remember that you must report these changes to your organic Specialist before the changes become an active part of your organic operation. Such changes may include:

- New sanitation materials
- New field inputs or pesticides
- New protocols for sanitation, pesticide application or other standard operating procedures
- New additions to your product verification list

Unannounced and Residue Testing

Along with annual inspections, the NOP requires that MCS conduct unannounced inspections for at least 5% of certified operations, as well as take

residue samples from at least 5% of certified operations.

These practices will continue during the pandemic using methods that follow CDC guidelines and support the well-being of our clients and inspectors.

Please remember that the NOP rule requires your participation if your operation is selected for either a residue sample or unannounced inspection.

Financial Support through the National Organic Certification Cost Share Program

We know that every penny counts right now, so don't forget to confirm that your filing for the Federal Cost Share Program is up to date. The National Organic Certification Cost Share Program, authorized through the US Farm Bill, allows certified organic operations to be reimbursed up to 75% of qualifying certification fees (up to \$750 per scope).

In 2019, MCS certified clients received over \$372,000 in reimbursed certification fees. We are awaiting the release of 2020 funds by the USDA this summer—please make sure your information is up to date so that you don't miss out!

- If your contact information has changed since 2019, you will need to complete a new W9 Vendor application and submit it to the state. You can find one here: <https://mofgacertification.org/wp-content/uploads/W9-Vendor-Form.pdf>
- If you are newly certified or haven't completed the W9 Vendor Form for the Cost Share Program, fill out a copy of the form listed above and submit it to the state.

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No Farm Should Go Out of Business During This Pandemic

We need local sustainable agriculture more than ever

As we figure out how to deal with day-to-day life during the coronavirus pandemic, we can be sure of one thing: We all need access to healthy, nutrient-dense food to help maintain our personal health.

Each day we get clear signs of the gaps in our local food system. Empty store shelves, hungry children who rely on school meals, and farmers who are concerned that they might go out of business because restaurants are closing.

Farms are still producing food every day – cows are being milked, greens are being grown, seeds are being planted – but Maine's critical processing, distribution and market systems are not set up to adequately get locally-produced food into the hands of Mainers. Almost 90% of the food that Mainers consume comes from outside of our region, making us vulnerable to national and international interruptions in our food supply.

Mainers should do two things right away to help ensure we have reliable sources of healthy food now and in the future.

The first thing we can do is support our local food producers. Many farmers' markets are adopting safety protocols and moving outside so that they can be safe pickup points for local food. While you should practice social distancing and send someone else to pick up food for you if you're sick, please continue to support these local markets.

Many farms are also setting up "no touch" farm stands where we can order directly from them and pick up a pre-packaged bag of food at the farm. You can find the latest on mofga.org. Please check online first before going to a farm to ensure they're open and find out what procedures they've put in place.

In addition to supermarkets and food co-ops distributing more local products, restaurants that are doing takeout meals might also become a purchase and distribution point for local food.

The second urgent action we need is for Governor Mills and the Maine Department of Agriculture, Conservation and Forestry, as well as our Congressional delegation, to make emergency funds available to farms so that not a single Maine farm goes out of business during this pandemic. The Small Business Development loans that have been publicized currently are not available to agricultural businesses.

The state should also increase the funds that are going into the Mainers Feeding Mainers program, to ensure that those who need quality food the most can access it, and that our producers are paid a fair price for their goods.

The state should also allocate emergency funds to ramp up the aggregation, processing and distribution channels for Maine products. Currently organic milk producers have to ship all of their milk outside of Maine to be processed. We need state-funded processing to make sure that Maine-produced food feeds Mainers.

Maine was the breadbasket of New England for much of our 200-year history as a state, but over the last 50 years, we've let our local food system decay. As corporations consolidated their control of the food industry, it became cheaper to produce processed food from factory farms and monocultures in the Midwest. Not only did this shift from a local and regional food economy to a global food system hurt our farms, but it hurt our public health.

As we see how vulnerable our food system is, now is the time to double down on supporting local farms. This virus will not be the last threat to feeding Mainers that we face, especially as the impacts of climate change and related environmental challenges compound.

When we come out of this emergency, not only should every Maine farm still be in business, but our state should be making the kind of investments needed to ensure that we have a reliable food system capable of supporting local producers and nourishing all Mainers in the future.

Sarah Alexander is the executive director of the Maine Organic Farmers and Gardeners Association, which certifies more than 550 organic producers in Maine and works to support and grow the local food system.

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- All W9 Vendor Forms must be mailed or faxed to the State of Maine Department of Agriculture: Debbie Davis, Office Associate II Division of Animal and Plant Health Maine Department of Agriculture, Conservation and Forestry 28 State House Station Augusta, ME 04333-0028. Phone: (207) 287-3891 Email: Debbie.Davis@maine.gov. **These forms are not processed in the MCS office.**

We are all in this together. We appreciate your resilience and tenacity during this unprecedented moment in our lives, and we are grateful for the work you are doing to keep our communities nourished.

Thank you, as always, for certifying with MOFGA Certification Services. We are proud to be your organic certifier!

