



## Evaluating Livestock Inputs As the Organic Industry Grows, Public Material Listings Lag Behind

By Matt Sircely

When Lisa McCrory started as Dairy Technical Assistance Coordinator for NOFA Vermont, there were only a few certified organic dairy farms in the state. "It was definitely exciting," she says. "It felt like a family was growing. Everybody knew each other. It was very cozy and warm and personal." The producers had followed organic practices for years — none were transitioning conventional herds.

But new issues arose as more producers chose organic. Herds dependent on conventional methods like antibiotics experienced heavy cull rates, while producers scrambled for solutions that could meet organic standards. McCrory began compiling lists of allowed materials and products, sometimes categorized by health situation, to support transitioning farmers. Without a public comprehensive organic livestock materials list, certifiers nationwide began to fill the void.

In a sense, little has changed says Jim Riddle, Organic Outreach Coordinator at the University of Minnesota Southwest Research and Outreach Center. "Compared to crop inputs, the whole organic livestock sector is still in a much earlier stage of development," he says. The fact that certifiers still review most livestock materials means that products "end up on the certifier's list, but the manufacturer isn't driven to get a generic approval from OMRI or WSDA."

**Today, the most extensive lists of organic livestock materials are still compiled by certifiers for internal use. Certifiers say that there are many reasons why OMRI listing is less prevalent for livestock products.**

Some input manufacturers are big enough that the organic sector is beneath their radar, while other manufacturers are so small, that the cost of a generic listing seems prohibitive. Many manufacturers still do not understand the basics of organic certification. Unfortunately, this means that certifiers must review the same product repeatedly and for each different application, each time requesting the most current information from the manufacturer. This can translate to higher costs for organic producers, because certifiers incorporate this unpaid material review work into their certification fees.

As Executive Director of the Northeast Organic Dairy Producers Association (NODPA), Ed Maltby spends much of his time advocating on a policy level. "What has increasingly become apparent is that different certifiers will allow different products for different applications, and that has caused some certifier shopping. There

also seems to be a lack of consistency of what kinds of records are needed, and how to review those records." In his efforts to advance producers' interests, Maltby advocates for a higher degree of qualification for certifying agents performing materials review, along with a greater understanding of the practical challenges producers face.

**"Any movement towards more consistent review criteria between certifiers and with OMRI is a step in the right direction,"** says Johanna Mirenda, Materials Specialist and Inspections Coordinator at Pennsylvania Certified Organic (PCO). "It's better for us, it's better for the operators, less confusion, less certifier shopping. I think the guidance that's coming from the NOP, slow and steady, has been really helpful."

PCO maintains an internal list of more than 7,000 materials — approximately half are livestock oriented. Mirenda reviews products such as mineral and vitamin premixes, including the carrier, forage and silage inoculants, medical treatments, teat dips, fly sprays and drinking water additives to control bacteria or pH.

"First, we check with OMRI, because if that product is OMRI Listed, then that certainly saves us a lot of work," says Mirenda. She then determines review criteria based on the material's intended use, but then must usually contact the manufacturer. Most are proactive, but she sometimes has to explain the basics of organic certification. "It can really slow down a review if we're not getting responses from the manufacturer," she says.

**J**ackie Von Ruden, Farm Certification Manager at the Midwest Organic Services Association says materials review is "definitely not always enjoyable. We have a MOSA status of 'MU', she says. "Manufacturer uncooperative." Nevertheless, the MOSA staff have established strong working relationships with most manufacturers in the process of building their comprehensive list for internal use. These relationships grant MOSA quick access to current information, so that they can verify materials for each specific use. Some manufacturers furnish outreach materials that facilitate quicker reviews.

Von Ruden cites broad agreement among certifiers about what should be allowed, but since the process differs, so too do approval results. Some manufacturers even use one certifier's ruling as blanket approval, says Von Ruden. "They don't understand why they have to release their proprietary information fifty times. I think the draw for manufacturers to OMRI would be the release of information one time and one time only."

Katherine Withey, Organic Livestock Certification Coordinator and Organic Material Registration Coordinator at the Washington State Department of Agriculture notes few livestock products are



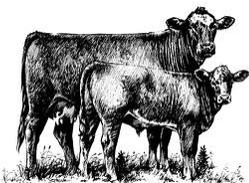
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publicly WSDA registered even though WSDA has reviewed hundreds of products for individual operators. "The lack of OMRI

listed or WSDA registered livestock products means that we have a much more complicated job in other segments of certification. We're doing deeper reviews on a more consistent basis," she says.

**The landscape of organic livestock inputs is broad.** The National Organic Standards Board continues to discuss several materials considerations, including yeast products, enzymes, genetically modified vaccines, amino acids, and the issue of excipients. With forthcoming regulatory clarifications, input manufacturers, certifiers and producers must remain attuned to minute details of which materials and ingredients are allowed, prohibited and restricted.

Brad Heins, Assistant Professor of Organic Dairy Management at the University of Minnesota West Central Research and Outreach Center operates a low-input trial herd of 90 organic cows alongside a parallel conventional herd. A comprehensive list will be an ongoing need into the future, he says, and is integral to the industry moving forward. "I've talked to some producers who are thinking of transitioning, and one of their biggest holdups is: 'What do I do when a cow gets sick? I can't use antibiotics anymore, so what am I supposed to do?'"



Albert Straus of the Straus Family Creamery in Marin County, California, notes that "Ninety-nine percent of the cure is prevention." Still, he worries most about the health of his fragile calves, and when searching for medications, vaccines and other materials, he

generally approaches manufacturers before asking his certifier. "If there was a more user-friendly system to be able to know if something is allowed or not, I think that would be helpful. Most producers and processors don't have time to run around and figure it out," says Straus, adding "OMRI listing is a very effective tool for producers as well as manufacturers, helping to make it a more streamlined process for everybody involved."

Maltby echoes the importance of instant access to information in crisis situations. "There is a great shortage of veterinarians who understand organics, so in times of emergency, producers need to call on the nearest veterinarian and they need to know what they can and can't use."

**Many certifiers and consultants agree that a public comprehensive list would aid innovation in the organic livestock sector.** The combination of urgency and uncertainty around allowed inputs can drive producers to only use products that have already been approved for their operation, creating disincentives for the use of new products and technologies. Heins echoes the sentiment. "We tend to use things that we've used in the past just because they've been approved. Then we don't have

a cow that's sick and need to do some fast thinking."

At Van Beek Natural Science, Anita Soodsma, Research and Development Product Formulator, says she is pleased with how certifiers and producers react to the OMRI Listed status of her organic product line. "They don't ask for any additional information from me because it has the OMRI seal."

For Lynn DeVaney, Vice President of Environmental Care and Share, Inc., OMRI Listing is crucial for several reasons. "OMRI not only helps us be sure we are in compliance with the organic standards, it is also a really great source of promotion."

OMRI has already incorporated into its strategic plan the goal of increasing livestock product listings. "Any time we can increase the utility of the OMRI Products List, we will," says Executive Director/CEO Peggy Miars, adding: "We're aware of the organic community's need for more public listings of livestock products, and we are consistently looking at ways to meet that need."

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MOFGA Certification is continuously researching and reviewing to find products that have ingredients that are allowed by the organic standards. Please let us know if there is a new product that you would like to add to your farm plan so that we can review it before you use it!

### Milk House Products

All dairy soaps and acid washes that are allowed for use by the PMO (Pasturized Milk Ordinance) and your state milk inspector are approved for use by MOFGA Certification, provided that the final rinse step is an approved sanitizer. Milk house products need to be labeled for dairy use.

### Allowed dairy sanitizers active ingredients commonly found on the market are:

Chlorine  
Iodine  
Peroxyacetic/peracetic acid

### Teat Dips

Allowed teat dip ingredients are:

Iodine  
Chlorhexidine—allowed when your iodine teat dip has lost its effectiveness