The dispute arose when MICI denied an organic certificate to The Country Hen, an egg producer based in Massachusetts, because it determined that the chickens did not have access to the outdoors, as required by organic regulations. The day after MICI issued its formal denial, the Administrator overturned its decision. “No one from USDA ever reviewed our files, talked to our Certification Committee, or even asked us a single question concerning the denial,” noted Don Franczyk, MICI’s Certification Administrator.

Accredited certifying agents are private entities or state governments that have been found by USDA to have sufficient expertise to determine whether farmers and food processors who apply to participate in the National Organic Program meet the organic standards. Accredited certifying agents have the legal authority to grant organic certificates, and USDA does not.

Judith Gillan, an MICI Board member, points out that the issue is much larger than the circumstances surrounding the agreement of both Vandana Shiva and Eliot Coleman to come to the 2004 Summer Conference, but perhaps the organic movement in the northeast — and NOFA in particular — is on a hot streak. These were the people at the top of our list to invite as keynoter and preconference presenter, respectively, and within two weeks of each other they both informed us they are able to come. Add to that excitement the possibility of a Saturday night “big event” debate between political luminaries, some possible changes in the entertainment lineup, and the addition of local salt (yes, salt!) to the Saturday evening local meal, and you know that the 2004 conference is on its way to being at least as great as the 2003 event, and, in our hopes, the best ever.

The Northeast Organic Farming Association will hold its 30th Annual Summer Conference from August 12-15 at Hampshire College in Amherst, Massachusetts. It is an event that has expanded its reach and brings together farmers, gardeners, consumers, doctors, nutritionists, activists, and many others to acquire skills, celebrate agriculture, talk and live a life worth living. On Friday evening, August 13 at the conference’s keynote program, the NOFA community will be addressed by Vandana Shiva, the Indian physicist, feminist, and eloquent protector of precious resources and opponent of genetic engineering. In a yet

(continued on page 3)
The NOP One Year Out

by Jack Kittredge

For many of us in the organic movement, this last year has been one of waiting and watching. Since the National Organic Program (NOP) took over legal control of commercial use of the word “organic” in October, 2002, we have been evaluating what it means to have this walrus in our farm stand.

Most of us have been willing to give the NOP a year or so to figure out what it is doing, get the bureaucracy up and running, develop a style, and set enough precedents to lay down a general picture of where it is going.

Well, a year has gone by and the picture is upsetting. The NOP started out by overruling MICI, the NOFA/Mass Certification Program, regarding the Country Hen’s chickens’ access to the out of doors. Then the Nathan Deal amendment was signed into law arbitrarily gutting the 100% organic feed requirement if the price gets too high. In a flexing of consumer/farmer/industry muscle we overturned that travesty, but at the cost of granting Senator Stevens’ demand that wild fish be declared organic. The NOP has failed to set up a peer review panel to give certification programs input into the accreditation process. It has declared that NOSB opinions, which are the best informed consensus of the organic movement to date, will be treated as strictly advisory. And now the USDA’s administrative law judge has thrown out MICI’s appeal - the effect of which is to say that the NOP can bestow an accredited program’s name and logo on a rejected applicant without even hearing the program’s reasons for rejection.

The volunteers who spend hundreds of hours on certification boards around the country may be surprised to learn that they are now unpaid Federal employees, with no more latitude to make judgements or use their years of accumulated knowledge of organic farming than a clerk at the IRS. Farmers, who have built the credibility and value associated with organic food through years of principled work and sacrifice are watching the fruits of that work and sacrifice benefit Johnny-come-lately agribusinesses drawn largely by the smell of profit and not at all reluctant to cut corners. Consumers, who have given us their trust and dollars so that we could return to them food fit to feed families, are at risk of once again being bamboozled, this time by their own government.

We have tried to put together in this issue a number of viewpoints on the NOP. Certifiers accredited and alternative ones, farmers (participating and dropped-out), consumers, and food policy advocates are all represented here. We hope you will read this issue carefully and use the information to ask hard questions about this program and how it serves the organic movement.

Advertise in or Sponsor The Natural Farmer

Advertisements not only bring in TNF revenue, which means less must come from membership dues, they also make a paper interesting and helpful to those looking for specific goods or services. We carry 2 kinds of ads:

- The NOFA Exchange - this is a free bulletin board service for NOFA members and TNF subscribers. Send us up to 100 words (business or personal) and we’ll print it free in the next issue. Include a price (if selling) and an address or phone number so readers can contact you directly. If you’re not a NOFA member, you can still send in an ad - just send $5 along too! Send NOFA Exchange ads directly to The Natural Farmer, 411 Sheldon Rd., Barre, MA 01005 or (preferably) E-mail to Jack@nofa-md.org.

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  - January 31 for the Spring issue
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  - October 31 for the Winter issue

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The Natural Farmer Needs You!

The Natural Farmer is the newspaper of the Northeast Organic Farming Association (NOFA). Regular members receive a subscription as part of their dues, and others may subscribe for $10 (in the US or $18 outside the US). It is published four times a year at 411 Sheldon Rd., Barre, MA 01005. The editors are Jack Kittredge and Julie Rawson, but most of the material is either written by members or summarized by us from information people send us.

Upcoming Issue Topics - We plan a year in advance so that folks who want to write on a topic can have a lot of lead time. The next 3 issues will be:

  - Spring, 2004 Access to Land
  - Summer, 2004 Organic Greens
  - Fall, 2004 The Organic Consumer

Moving or missed an issue? The Natural Farmer will not be forwarded by the post office, so you need to make sure your address is up-to-date if you move. You get your subscription to this paper in one of two ways. Direct subscribers who send us $10 are put on our database here. These folks should send address changes to us. Most of you, however, get this paper as a NOFA member benefit for paying your chapter dues. Each quarter every NOFA chapter sends us address labels for their paid members, which we use to mail out the issue. If you moved or didn’t get the paper, your state chapter, not us. Every issue we print an updated list of “NOFA Contact People” on the last page, for a handy reference to all the chapter names and addresses.

As a membership paper, we count on you for articles, art and graphics, news and interviews, photos on rural or organic themes, ads, letters, etc. Almost everybody has a special talent or knows someone who does. If you can’t write, find someone who can to interview you. We’d like to keep the paper lively and interesting to members, and we need your help to do it.

We appreciate a submission in any form, but are less happy to see hand-written. To be a real gem, send it via electronic mail.

If you have any ideas or questions, one of us is usually near the phone - (978) 355-2853, fax: (978) 355-4046. The NOFA Interstate Council website is www.nofaic.org.

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USDA Decision on The Country Hen (continued from page 1) cerns of one certifying agent. "If USDA can overturn a certifying agent’s decision without even holding a hearing, how can consumers be confident that food bearing the USDA Organic seal was produced in the manner they expect?" Gillan adds, "For decades, farmers and consumers have counted on certifying agents to uphold strict organic standards. We can’t do our job if we are denied the right to appeal USDA decisions. It’s that simple."

Jill Krueger, an attorney with Farmers’ Legal Action Group (FLAG), observed that, "USDA usurped the role of the certifying agent, undermined the organic standards, and failed to provide due process. It is unlikely that the organic community will accept this state of affairs, any more than it accepted last year’s attack on the organic standards.” An exemption that would have allowed poultry producers to feed their chickens non-organic feed was overturned by Congress in less than two months earlier this year due to intense pressure from the organic community. FLAG represents MICI in its appeal.

Gillan said, “The Organic Foods Production Act recognized that there was already considerable expertise in organic farming in the private sector. That is why Congress included private certifiers in the National Organic Program. All we ask is that we be allowed to play this important independent role. Maintaining the independence of certifying agents is crucial to the preservation of organic integrity.” MICI expects to make a decision about its next step in the legal process in the near future.

To read the judge’s decision and MICI’s legal pleadings, visit the Farmers’ Legal Action Group website at www.flaginc.org.

FLAG is a nonprofit law center in St. Paul, Minnesota dedicated to providing legal services to family farmers and their rural communities in order to help keep family farmers on the land.

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Kim G. Matland
In the long run men hit only what they aim at. Henry David Thoreau

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Corporate agribusiness overlooks “external costs” in touting efficiency. The proclaimed benefits of a worldwide industrial agriculture system wouldn’t measure up very well when compared to sustainable food system if an evaluation of the industrial system honestly measured all of its “external costs,” claims Jules Pretty, professor and director of the Centre for Environment and Society at the University of Essex in England. Pretty, who is editor of the Journal of Sustainability, contends that “those who support industrialized agricultural production do not have its successes in narrow economic terms of food price and availability and tend to ignore its costly unintended consequences to society and the environment.” At his Centre, he is studying these “externalities” such as water pollution from farm waste, soil nutrients, erosion, and pesticides; loss of landscape and biodiversity; food-borne diseases; air pollution from gaseous emissions; unnecessary transportation costs of food; human dislocation from rural to urban; rural community decline; poor human diets and obesity, and cost of direct government subsidies. Some of the sustainable ag benefits were landscape aesthetics, biodiversity, clean water, flood protection, carbon sequestration, rural economy, and community cohesion. He says that so-called “cheap food” is very expensive because it’s paid for in many ways: (1) at the market; (2) through taxes for subsidies; (3) through environmental cleanup costs; (4) through treating diet-based human health concerns; and (5) through economically diminished rural communities. source: AgricBusiness Examiner 8/29

EPA admits lack of certainty on safety of sewage sludge, signals apparent policy shift. On October 29, Paul Gillman, EPA’s spokesperson and Assistant Administrator for Research and Development, stated an apparent policy shift on sewage sludge when he told CBS Evening News, “I can’t answer it perfectly safe. I can’t answer it’s not safe.” This shift came two weeks after EPA’s announcement that it would not regulate dioxin contamination in sewage sludge. The EPA’s admission that there is no scientific consensus on the safety of land applied sewage sludge is consistent with a June 1997 opinion of the federal Fifth Circuit Court of Appeals (Scandurra et al. v. Kearfott et al.) that stated: “The conclusion the evidence at trial suggests is that experts have yet to reach a consensus on the safety of land application of sludge.” In June 2003, a court in Augusta, Georgia, ruled that sewage sludge used on a hay crop caused the deaths of 300 dairy cows on the Boyceland Dairy Farm. For over a decade, EPA has promoted sewage land composted with sewage sludge. Independent research shows that sewage sludge contains numerous hazardous materials, including but not limited to, the toxic heavy metals lead and arsenic, PCBs, dioxins, and other hazardous organic materials. Although EPA now admits it does not know if it is safe, the practice of disposing of sewage on land resulted in over five million dry tons of this hazardous material being spread on American soil and crop land last year alone: source: CBS Evening News broadcast, “Sewage Fertilizer Under Fire,” 2003/10/29

A federal court in Kentucky ruled that food giant Tyson is responsible for pollution at factory farms. The Sierra Club and local residents sued Tyson for failing to report hazardous releases of ammonia from four animal feedlots under its supervision, located in Webster, McClean, and Hopkins counties. Tyson had argued that it was not responsible for pollution from its factory farms because the operations are run by people who raise chickens for Tyson under contract. Federal Court Judge Joseph McKinley, however, ruled that Tyson is “clearly in a position of responsibility and power with respect to each facility . . . and has the capacity to prevent and abate the alleged environmental damage.” Source: The Agribusiness Examiner, November 11, 2003, Issue #301

Bush Insulates Pesticide Makers from Lawsuits. In a significant policy reversal, the U.S. EPA has reinterpreted a federal law and now claims that it bars suits against chemical manufacturers when their pesticides or herbicides harm a crop they are supposed to protect or fail to eradicate an insect or blight. The policy shift could also make it more difficult to sue pesticide makers when their products cause sickness or environmental damage. “It could really be disastrous for public health,” said Erik Olson of the Natural Resources Defense Council. source: USA Today, 6 Oct 2003

Soil Association reports that sales of organic food in the UK have topped £1 billion for the first time. The demand for Organic produce is growing by 10% each year in Britain - faster than any other food group in the supermarket and the supermarket share of the organic market has fallen slightly, for the first time in five years, from 82% to 81%, one reason for which is the growing popularity of own-label own-label food, which now account for a tenth of all organic sales - up by a third on last year. source: coordinator@geneticfoodalert.org.uk, 11/06/2003

South Dakota’s constitutional amendment banning corporate ownership of farms struck down. The federal judge that the 1998 measure was designed to prevent out-of-state companies from operating in the state, and thus in violation of the interstate commerce clause of the US Constitution. The ruling is being studied to see if it will affect similar bans in other states, such as Nebraska. source: Alternative Agriculture News, September, 2003

Bioterrorism Act requires registration of food processors, including on-farm. Regulations for the 2002 bill have now been promulgated and require food processing facilities to register their name, address, type of food processed and all brand names used with the FDA. There are some exceptions for farmers which raise and process their own food. The rule requires the on-farm processor to maintain records and to keep the requirements at www.fda.gov/oc/bioterrorism. hoaxact.html or call 888-INFO-FDA to see if some farm, jelly, or pickle operation you do technically require registration. Source: Growing for Market, September; 2003 and The Inspector’s Report, Fall 2003

Schools Resisting Lunch Irradiation. According to a New York Times survey, 34 of 56 school officials interviewed said they would not serve irradiated beef. The Food and Drug Administration’s approval of the process by the USDA. Most indicated nervousness about the safety of the product. In a recent survey of school officials, 81% of respondents said they would not serve irradiated products. source: Organic Business News, October, 2003

EPA Sued for Failing to Protect Children. The 1996 Food Quality Protection Act required the agency to protect children ten times more stringently than adults as a “safety factor” unless the agency could demonstrate that children do not have special sensitivities in a certain case. Last year EPA’s scientific review panel found that the agency had not done so when reviewing the class of organophosphate insecticides. Now two lawsuits have been filed to force the agency to obey the law. source: Growing for Market, October 2003

Does Size Matter? In California, over half the value of organic production is generated by only 2% of the growers, who each control between $1 and $4 million; 10% of the growers grossing $10,000 or less comprise 75% of the growers, but only 5% of the sales. source: Ecology and Farming, September – December, 2003

Pressure treated wood is being withdrawn from residential uses December 30, 2003, although it will still be allowed in farming and permanent foundations. The TSB is restricting treated and crumbled copper arsenate treatment for wood in most residential settings because of concern about exposure to arsenic – a known human carcinogen. The TSB recommends not to use as lumbering timbers, fencing, decks, play structures, patios, etc. The EPA plans to evaluate the farm and foundation exceptions through a longer public participation process. Source: In Good Tilth, August 15, 2003.
Percy Schmeiser Raising Funds for Appeal.

The Canadian farmer who is fighting Monsanto over contaminating his fields with GE canola pollen has a new fund to help the case he made by the Canadian Supreme Court on January 20. Anyone interested in donating to his legal fund can do so at his website at: http://www.percyschmeiser.com. Donating a check to “Percy Schmeiser Altered Food Fund Inc.” Box 3743, Humboldt SK Canada SOK 1A0 source: percy@schmeiser.com, 11/16/03

Kuczynich Introduces 6 GE Bills. Congressman Dennis Kucinich (D. Ohio) introduced 6 bills into Congress in July regulating genetic engineering in agriculture. The Organic Trade Association and the American Corn Growers Association have both endorsed all the proposed laws, including imposing a moratorium on planting GE cotton crops, imposing liability directly on the biotech companies for all effects of their creations, and requiring labeling of GE foods. source: The Inspectors Report, Fall 2003

Cabinet papers warn Canada off GM crops. A secret briefing to the Canadian government has warned that the country’s massive food exports are at risk from its continued use of GM crops. The paper, which has been obtained under the Access of Information Act, warns the cabinet of the “pressing need to immediately address these concerns”. Such fears contrast with the government’s repeated endorsement of GM crops and technology as a great opportunity. Canada is the third-largest producer of GM crops after the US and Argentina. Canadian farmers’ greatest fear, the report continues, is the introduction of GM wheat, of which trials are already under way in Canada. The Canadian Wheat Board has just surveyed its overseas customers in Europe, Japan and the US, with 82% saying that they would not take GM wheat. The export market for milling wheat into bread is worth £2bn a year to Canada. Canada lacks legal regulation to thwart the introduction of GM wheat, but some farmers have suggested that the government establish a legal defence, pointing out that if GM wheat - basically a grass - escaped into the Canadian countryside it might become an extremely difficult weed to eradicate because it would be herbicide resistant. source: The Guardian, 11/13/03

A new report published by the UK government on 16 October shows that conventional varieties of oilseed rape, maize and sugar beet are contami- nated with GM traits in a much faster way than previously expected. The report shows that these crops can pollinate conventional oilseed rape with pollen from GM oilseed rape over a distance of 26 km. The report was originally commissioned to assess the impact on farmland wildlife of planting the herbicide-resistant GM crops. With regards to wildlife, the report shows that in GM beet fields there were 60 percent fewer weedy seeds, less butterflies and fewer bees and in GM oilseed rape there were 80 percent fewer weedy seeds and also less butterflies. The report concludes that this ultimately could lead to a decline in bird population. source: Bridges Weekly Trade News Digest - 23 October, 2003

An influential British government study revealed that farming of some biotech crops could lead to significantly lower numbers of insects, an impor- tant link in the wildlife food chain. The report — one of the first of its kind reaching the public about the effects of biotech crops ever — likely will play a major role in Britain’s, and possibly all of Europe’s, evolving policy on biotech farming. Any indication that crops from genetically modified organisms might have an impact on the environment, even if only indirectly, is politically explosive in Europe where groups such as Greenpeace campaign vigorously to limit the scope of such products. source: The Wall Street Journal October 20, 2003

Gene Monsters Not Destroyed in Pigs’ Guts. A new study published in the journal “Nature Biotechnology” has found that genetically modified (GM) DNA from Bt corn was not totally degraded in the gastrointestinal tract. These findings question its safety for animal feed and give the lie to industry and government claims that GM DNA is destroyed by the digestive process. An abstract of the paper is at: http://www.gmwatch.org/archive2.asp?arcid=1612 source: BioTech Activists (biotech_activists@iatp.org) 10/18/2003

Monsanto Pulls Out of Europe. Monsanto, the world’s largest GM seeds company, is pulling out of the European cereal business in a surprise move that raised hopes of victory among anti-GM campaign- ers. The firm, the American pioneer of GM, con- firmed yesterday that it was pulling out of the European cereal business headquarters at Trumpington, Cambridgeshire, which employs 125 people. The decision follows the news that Monsanto produce genetically modified hybrid wheat to Europe, and the company has decided to cut costs. source: The Guardian, Thursday October 16, 2003

EU Delays Vote on GM Limits. The European Union has delayed until next spring a vote on the limits on the amount of GMOs allowed in cereal and vegetable seeds. The European Commission had proposed labelling seeds that contained between 0.3% and 0.7% GM material, depending on the crop. The biotech industry maintained that the low level was too restrictive, while environmental groups felt the level was too generous. source: http://www.gmwatch.org/archive2.asp?arcid=1668, October 31, 2003

Under pressure from the United States, the Euro- pean Union’s Commissioner for Agriculture in November it would begin trying to lift the 5-year-old ban on biotech products, starting with canned sweet corn. But it conceded strong opposition in many countries meant any decision would probably be delayed until next year. While some member states such as Britain, Spain and the Netherlands are anxious to have the ban on new approvals lifted, another bloc including France and Germany is less enthusiastic. In a majority could not be found on Dec. 12, the application would go directly to EU farm ministers, who would have another 90 days to consider it. That delay would suit the interests of biotech opponents loathe to be seen as caving in to U.S. pressure, especially before new EU rules on labeling products containing biotech ingredients go into force in April. source: Associated Press Worldstream, November 7, 2003

Monsanto said it would hold off on a $40m investment in Argentina, but to do so it “needs fair and 'Acts of Terrorism'. All the companies surveyed felt that too little was known about the long term effects of such projects. Under pressure from the United States, the European Union’s Commissioner for Agriculture, while the environment to be able to offer any form of cover. "20 years ago insurers were writing policies for asbestos without a care in the world - now they are facing claims of hundreds of millions of pounds. The insurance industry has learned to be wary of new things, and there is a real feeling that GM could come back and bite you in 5 years time", said one company spokesperson. source: http://www.gmwatch.org - 10/11/03

Biggest Farmer Goes GM-Free. The Co-op - which is Britain’s biggest farmer and sells £5bn worth of food annually - has announced that it is becoming a GM-free company, making it the first in its entire business. The company, which owns farms, supermarkets and a bank, has said it has taken the decision as a result of a survey of its customers. Four-fifths of Co-op customers surveyed said they would not knowingly buy food containing GM ingredients. Animals on its 85,000 acres of farms will not be given GM feed. It will also refuse to grow GM crops even if the government insists it is safe. The group’s move is likely to put pressure on other supermarkets to eliminate GM ingredients from their products. The move with the GM crop mar- ket chain - already says it will no longer sell meat from animals raised on GM feeds. source: http://news.bbc.co.uk/1/hi/business/3209424.stm 10/25/ 2003

Blair May Ignore Public Opposition To GM. UK prime minister Tony Blair has signalled that he is ready to ignore growing public opposition to the use of GM crops and to proceed with the technology. In lan- guage reminiscent of his pronouncements in the run-up to the Iraq war, Blair was yesterday in “trying to do the right thing.” The Prime Minister’s reaction, in the week after the results of the Government’s own trials proved that growing at least two GM crops damaged wildlife, has angered and angered senior officials. They are bewildered by his views that seem to have remained unchanged since he put his own Government advisers has progressively demolished the case for the technology. source: http://news.independent.co.uk/environment/ story.jsp?story=457297.10/30/2004
New Zealand: Protestors Arrested, Resistance Continues. In New Zealand, where the government has just passed legislation lifting its moratorium on GM crops in the face of massive protest, five anti-GM protestors were arrested after refusing to take down tents pitched on Parliament’s front lawn. The protestors warned there would be direct action against GM projects: “We will be using whatever means necessary within the non-violent toolbox.” In parliament, the two members of the Labour-led government’s junior coalition member, Progressive, invoked their right to vote against their senior partner and sided with the legislation’s opponents. Just after the legislation was passed, a petition with 55,000 signatures, calling for a five-year extension to the moratorium, was presented to Green MPs, the most staunch parliamentary opponents of GM. A recent opinion poll showed that 53% of those polled did not have confidence in the regulatory body ERMA. Source: http://www.gmwatch.org/archived2.asp?articleid=1664 October 31, 2003

A study prepared by Robert Wisner, Ph.D. - a leading grain market economist at Iowa State University - shows that the commercial introduction of Monsanto’s genetically engineered wheat in the next two to six years could cause major risk to the U.S. wheat industry. After examining data on existing markets, consumer trends, and grain handling and transportation systems, Wisner concluded that the commercial introduction of Roundup Ready wheat could result in the loss of 30 to 50 percent of U.S. spring wheat export markets. Montana and North Dakota are the country’s major hard red spring wheatgrowing states. Source: Farm News from Cropchoice. 10/30/2003

The Northeast Organic Farming Association of New Hampshire will convene its second annual Winter Conference on Saturday, March 6, 2004, in Concord, New Hampshire. The Conference will feature more than two dozen educational workshops for farmers, gardeners, and consumers. For further details, and registration materials, please contact NOFA-NH at nofanh@innevi.com, (603) 279-6146, or 4 Park Street, Suite 208, Concord, NH 03301. You may also check our website for more information when it becomes available: www.nofanh.org

Winter Conferences!

Making it Organic - A Seminar For Food Processor & Growers

February 11, 2004
Greenfield Massachusetts
9:30 am - 4:30 pm

A panel of experts will outline the key steps to becoming a certified organic processor and getting your products to market. Topics will include an overview of the organic movement, navigating through the National Organic Program, and marketing organic products. Presenters include industry experts and experienced small and medium sized processors providing insights into working with the new organic standards.

Confirmed speakers include Holly Givens, Communications Director for the Organic Trade Association; Bob Burke, Principal, Natural Products Consulting Institute, expert in organic product marketing; Dan Rosenberg, President, Real Pickles; Frank Carlson, Carlson Orchard, organic cidermaker; Don Franczyk, Certification Administrator and John Weaver, Purchasing Manager, Fairfield Farm Kitchens, makers of Organic Classics and Moosewood brand organic products.

Sponsors include the Massachusetts Independent Certification (Baystate Organic Certifiers), Massachusetts Department of Agricultural Resources, Franklin County Community Development Corporation - Western Massachusetts Food Processing Center, Organic Trade Association, Northeast Institute of Food Technologists, Massachusetts Specialty Foods Association, and the Northeast Center for Food Entrepreneurship.

For more information about Percy’s case, visit: http://www.percyschmeiser.com

The conference is co-sponsored by the Center for Food Safety; www.centerforfoodsafety.org. Workshop topics range from hands-on, practical skills to GE foods and organic land care tracks, which will be offered throughout the day.

For more information, contact Kate Harris, the NOFA/Mass Winter Conference coordinator at <kate@earthlovers.org>, (413) 586-5516 and visit the NOFA/Mass conference webpage at: http://www.nofamass.org/conferences

The 2004 conference returns to Quabbin Regional High School in Barre, Massachusetts. This year we’re adding a workshop for Small-Scale Organic Farmers. Percy Schmeiser, the farmer from Bruno, Saskatchewan Canada whose canola fields were contaminated with Monsanto’s Round Up Ready Canola has agreed to join us! Monsanto’s position is that it doesn’t matter whether Schmeiser knew or not that his canola field was contaminated with the Roundup Ready gene and that he must pay their Technology Fee. Percy is fighting back on behalf of all farmers. The Supreme Court of Canada will hear the case of Percy Schmeiser on January 20th, just four days before Percy will be speaking with us. This decision is a victory for farmers who currently stand liable for the accidental contamination of their fields, and a battle won in a larger war against the patenting of GE seeds.

There will also be over 25 other workshops taught by experienced farmers and agriculture specialists for farmers, home gardeners, educators and concerned consumers. Some of the workshop topics include: Agroecology, Pastured Poultry, Grain Production, 5 Acres and Independence, Organic Lawn Care, Starting Your Farm Business, Acupuncture for Livestock, and Energy Efficiency.

Included in the company of prominent workshop presenters are Vern Grubinger, from the University of Vermont’s Extension Service and Center for Sustainable Agriculture; Craig Holdrege, from the Nature Institute; and Stephen Buhner, author of The Last Language of Plants: the Ecological Importance of Plant Medicines for Life on Earth.

A special children’s conference is available for young farmers ages 6-13 which will offer farm-related workshops, games and crafts. Pre-registration for the children’s conference is required. A colorful farmers market of crafts and food, and an exhibitor’s display of educational material will be held all day.

Registration is available in advance or at the door the day of the conference. $35.00 for members and $45.00 for nonmembers. $5.00 discount for farmers. The conference will begin at 9 am. with the keynote at 10:45 am and closing remarks at 5 p.m. For more information about this event, or a conference brochure, please call NOFA-VT: 802-434-4122

The Natural Farmer Winter, 2003 - 04

NOFA-NY’s ORGANIC FARMING & GARDENING CONFERENCE

Friday, Saturday and Sunday January 30, 31 and Feb. 1

featuring

Full Day Pre-Conference CSA Production Training Plant Breeding on the Farm & in the Garden Saturday & Sunday Gardening Focus for All Gardening Levels Northeast CSA Convocation & Skills Building Celebration & Awards Dinner Small Grains & their Significance in Organic Vegetable Rotations Reports on the Latest Research in Organic Methods Best VARIETIES Roundtables & more Keynote Speaker Danish Organic Farmer Thomas Hartung, running a multi-farm box delivery business with over 38,000 customers weekly Location: Syracuse NorthEast Organic Farming Association of Vermont (NOFA—VT)

22nd Annual Winter Conference: “Expressing the Culture in Agriculture”

The Northeast Organic Farming Association of Vermont (NOFA—VT) announces its 22nd Annual Winter Conference on Saturday, February 21st at the Vermont Technical College in Randolph, Vermont. Expressing the Culture in Agriculture will spotlight the influential role agriculture and the rural landscape in art, film, theater, song, and writing. George Woodard, local organic dairy farmer and actor has been invited to perform with his Ground Hog Opry as the keynote theater.

Woodard is best known in New England for his Ground Hog Opry, a touring revue of Vermont lifestyle humor, political satire, and classic country music. The Opry satisfies Woodard’s urge to keep community theater an active force in Vermont and the show goes on tour every other year throughout the state.

In addition to Woodard, other Vermont artists will be presenting short films and theater pieces as well as leading hands-on art/craft workshops such as Harvest Basket Weaving and Medicinal Tinctures.
Agricultural Outreach Specialist. A multi-partner watershed-based program in northwest NJ seeks crop advisor to help progressive conventional farmers consider or implement organic farming without owning their own place. Contact Paul Bucciaglia, Fort Hill Farm, 18 Fort Hill Rd., Hadley, MA 01027, 413-527-9122 farmer@olturtlefarm.com.

Internships on CSA farms. If you are looking for an energetic, hardworking person, who loves to be outdoors, and who wants to learn about organic farming. Come work with me from mid May to mid October (somewhat flexible) with planting, cultivation, harvesting, and delivering. The farm is located in Sullivan, NH, surrounded by woods, with fields that expose views of Mt. Monadnock. I have 2 acres of cultivation and market through a 75 family CSA, the Hancock Farmers Market, and a few wholesale accounts. For more info, call Tracie at 603-847-9066.

Housemate Wanted with Option to Farm in Vermont. Single or stable couple to share my home, off-grid, wind/solar, wood heat. Organic land available, berries, greenhouse, garden, pasture, etc. Near lots of Farmers’ Markets, coops, etc. I will be away at school much of the time, as will my college-aged son, so you would have the run of the place a good deal of the time. Must like cats. Non-smokers, reliable, mature and quiet a must. A great opportunity for the right person(s) to start farming without owning their own place. Contact Anita: 802-485-4022.

Assistant grower position available for 2004 season. Of Turtle Farm, 18 acre diversified vegetable farm, looking for an energetic person eager to become an integral part of the operation. Will be involved in all aspects of the operation from seed selection to CSA management. Field work and tractor experience necessary. Potential for a long term position. Salary, farms and vegetables and workman’s comp. Contact Ellen, Of Turtle Farm, 85 East St., Easthampton, MA 01027, 413-527-9122 farmer@olturtlefarm.com, www.olturtlefarm.com.

Herb Farm offers a HerbaCulture Work/Study Program on our 85 acre certified organic farm in southern Oregon. The program runs April 29th to July 30th, 2004. 30 hrs/wk of work includes cultivation and harvesting of herbs for 10-12 hrs of classes covering topics on organic farming and herbism. A strong interest in organic farming is essential. Must be in excellent physical condition and prepared for hard work. No monetary fee. Communal housing provided. For application write: Work/Study, Herb Farm, PO Box 116, Williams, OR 97544-0116 or call (541) 846-9096. For more details visit www.herbfarm.com/Education/workstudy_f.html
Can A Public-Private Partnership Work with USDA?

Having worked tirelessly to shape the National Organic Program since it was first proposed in the late 1980s, farmer Liz Henderson details some of the program’s problems and how they came about.

by Elizabeth Henderson

Watching the USDA’s National Organic Program (NOP) jolt into action is like watching the inauguration of a new combine with 500-plus moving and adjustable parts. The manufacturer guarantees that all the parts are there, but it takes use, practice and many patient adjustments to make the machine run smoothly. In the case of the NOP, the manufacturer is the Congressional Conference that cobbled together the final version of the Organic Foods Production Act (OFPA) from the House and Senate versions of the law in 1990. A centerpiece of their conception - demanded by the alliance of non-profit groups and industry interests who pushed for the law - was that the organic program would function as ‘a’ public-private partnership. The National Organic Standards Board (NOSB) was to represent the private sector. The OFPA gives the NOSB specific control over the national list of materials for organic farming and processing. The law also mandates the creation of a Peer Review Panel with members from the organic community to work with USDA on an on-going basis to ensure the fairness of the accreditation process. This first year of the NOP has seen the USDA staff continuing to try to wring out of the mandate to cooperate with the organic movement by failing to appoint the Peer Review Panel or to accept over 50 NOSB recommendations.

In place of bureaucrats who trudge reluctantly through the process of creating the NOP, why can’t we have a NOP that is the champion of organic agriculture throughout the entire federal bureaucracy? Under an inspired program leader, the NOP could take advantage of cooperation with the organic community to educate USDA and push for the inclusion of organic alternatives in every federal conservation and public food program. A motivated NOP might use the enforcement power of the feds to root out the few big cases of massive fraud in the marketplace, and encourage the states to take care of the smaller infractions of organic integrity. A NOP that was responsive to the organic movement would help spread the word about the benefits of organic, and maybe even get the Secretary of Agriculture to understand that genetic engineering is not the path to a sustainable future.

As co-chair of the National Campaign for Sustainable Agriculture (NCSA) organic committee and NOFA representative to the national scene since 1989, I find myself deeply distressed at what this long process reveals about US democracy. From 1989 to 1992 with the Organic Farmers’ Associations (OFAC), then with the NCSA, I have participated in a protracted effort on behalf of organic farmers and small non-profit certifiers to play a positive role in shaping the NOP, offering solutions rather than just standing back and criticizing. Since 1997, our organic committee has had weekly emails, monthly conference calls, and two or three face to face meetings a year. Can it be that this level of involvement is necessary for every federal program?

The first version of the OFPA (the Leahy Bill) which Kathleen Merrigan brought to the 1989 OFAC meeting in Leavenworth, Kansas, would have eliminated small private certifiers completely and thrown all certification into the hands of state departments of agriculture. The traces of this initial thrust remain in the greater leeway the program grants to state controlled certifiers. Loud lobbying by the OFAC board and members of the organic farmers associations around the country resulted in a place at the NOP table for private certifiers. Though I recall one of the ‘industry leaders’ of the Organic Trade Association (OTA) saying in 1990 that even the revised law would result in a ‘shake out’ of small organic farms and certifiers. For those of us who had been involved in the organic movement previous to 1990, one of the deal breakers for a USDA organic program was that it not destroy the already existing network of organic certifiers. As Michael Sligh put it in the Preamble to his collection of documents relating to the OFPA, “The other very strong requirement was that USDA should not ‘reinvent the wheel.’” Rather, the USDA was to build on and enhance the existing private sector infrastructure and expertise. The core of this relationship was that the new law should not damage the organic pioneers who built this movement to its current state. Nor should the new law threaten consumer confidence.” (“Toward Organic Integrity”, RAFT, 1997, p. iv).

The NOP has not yet found time to take measures that would assure consumer confidence that the NOP is granting accreditation fairly. The public does not have access to information about how the NOP makes its decisions. There is still no operations manual that clearly states the procedures and criteria for accreditation leaving certifiers shooting in the dark. Some of the accreditation decisions raise red flags. The NOP granted accreditation to the Georgia certifier that allowed the farms producing for Fielddale Chicken to feed as little as 15% organic feed. By contrast, the NOP ordered the Massachusetts certifier which refused to certify a chicken farm that did not allow outdoor access for its chickens to grant certification to that farm or lose accreditation. A functioning peer review panel overseeing NOP accreditation might catch these inconsistencies.

Unnoticed by all except a few readers of very fine print, two different models of certification/accreditation have been at war all along. The writers of the OFPA conceived of certification as a federal license which the NOP grants to certifiers and the certifiers pass on to farms and processors. Only the NOP can take it away. Those of us familiar with certification/accreditation as it has functioned historically on the international scene understood the process differently. Under the rules of ISO, the International Standards Organization, the accrediting agency must be totally separate from the certifier, just as the inspector must be totally separate from the farm...
being inspected. Each certification program’s standards and procedures must meet the basic requirements of the accreditor to gain approval, but they do not have to be identical with all others or with the accreditor’s standards. The certification program which grants certification must also have the power to deny or retract certification. The accreditor makes sure this is done fairly. The relationship is 3rd party, not program to program. None of this was clear in 1990, when the EPA passed as part of the Farm Bill. The implications for certifiers are troubling. Since October 21, 2002, they find themselves functioning in a new role - agents of a federal program which has little enthusi-asm for the whole enterprise of organic agriculture.

Getting certified today is different from what we hoped for when we set up our locally controlled programs back in the 80’s. It’s like taking homework and sending them to public school. If the children are lucky, the public school is well run and the teachers conscientious and personable. All the schools in a state follow the same rules and curricula but some localities give a better education than others. From 44 organic certifiers, we have moved to 124 different interpretations of the one NOP program. So far, the NOP has not made good on the promise of reciprocity and consistency among certifiers. Farmers now shop for the pro-gram that handles their particular non-compliances most leniently. The uneven treatment of certifiers by the NOP accreditation auditors will have the certifiers wishing they could shop around too. Some accreditation auditors have come down hard on certifiers who allow farmers to use materials that the NOSB has approved, but the NOP has failed to put into Rule making. Other accreditation auditors overlook materials questions to focus on a variety of procedural issues such as a certification committee making clear that is uses only the NOP standards and no other criteria in granting certification.

In the early years of NOFA certification, the stan-dards were fresh in our minds - we had threshed them out at hundreds of hours of meetings between farmers and university researchers. My farm inspector was Eero Ruuttila - walking around my farm with him was a pleasure and a great learning experience. Eero brought his knowledge of the organic market in the Northeast and enthusiasm for expanding that market. I could share with him my struggles to the organic market. I could share with him my struggles to

Teaching Farmers to Lie

With the launching of the NOP, the certifier has become the monkey in the middle. Since the NOP has not taken the recommendations of its advisory committee, the National Organic Standards Board, to revise the definition of compost and to add a long list of materials, the certifiers are placed in the untenable position of seeing farmers using compost and materials that should be fine to use on organic farms but are not on the ‘national list.’ All the way down from the NOP has come the advice to call compost ‘Rotted Organic Matter’ and spread it anyway. On our farm, we call it ‘seedy ROM.’

The missing materials and the compost are the nuts and bolts that the public-private partnership could adjust easily if it was functioning and if the relation-ship of the NOP to the organic movement were friendly and open. Then there might be a chance to correct some of the bigger omissions from the OFPA - starting with the total failure to say anything about the people in organic agriculture. The law says nothing about organic meaning socially just as well as environmentally sound. Organic should be synonymous with Fair Traded, assuming fair prices and contracts for farmers, and living wages and decent working conditions for farm workers. The Soil Association in England has begun to certify to a clear set of social standards that include farm safety, decent wages for farm workers and the requirement that companies buying from farmers follow rules that ensure that the contracts are fair. The IFOAM accreditation service has begun working with FLO, the fair trade organization, to see if a process for granting both certifications with one fee and one inspection could become a reality, saving time and money for the 150,000 small farms in developing countries that use both labels. The worldwide organic movement is continuing to evolve and raise its standards. But the NOP is not in the custom of cooperating with grassroots movements. Com-mands for action come from above - or not at all.

Behind the scenes, USDA is in the habit of respond-ing to what Michael Pollan calls Big Food. As a consequence, the NOP has removed some of the materials for processing from NOSB review by reclassifying them as ‘food contact substances.’ Without this new category, the organic public might testify vociferously against the highly artificial and synthetic processes that are necessary to make such ingredients as organic high fructose corn syrup. No corn syrup - no organic pepsi, the drink the entire organic world has been waiting for. As in the rest of the food system, the money in organic is in the ‘value added’ food and its distribution. Chirpy little organic farmers and their home grown certifiers can just line up with the other family farmers for a handout or take a real job off the farm.

So why bother with all this bureaucratic redtape? Personally, I have had my farming certified organic since NOFA Massachusetts started doing it in 1985. There have been many benefits. The certification process itself forces you to keep careful records of your practices and do an annual review of your farming. You cannot run a successful and sustain-able farm enterprise without paying attention at this level of detail. ‘Certified organic’ has been a useful label for marketing our produce, even though most of it goes through Community Supported Agriculture. Every year, we have had to recruit new members. People who do not know us are attracted to the organic label, a convenient shorthand. The initiation of the NOP has brought a great deal of publicity to organic and greater recognition and attention from the Cooperative Extension and university researchers. Those of us who created the label should enjoy the benefits of this new atmo-sphere.

I do not see the alternative as creating a new label. I will be hog-tied and branded before I set up another system of verification to be taken over by another set of well paid professionals. Our farm could, and may decide to, just rely on our local reputation. We are well enough known in the Rochester area that I

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think we could do without the label. But whether I certify organic or not, I see the effort to keep the US organic label meaningful as part of our struggle to retain our democracy and to keep the definition of organic in the US in line with its meaning worldwide. The NOSB is a small toe in the door of USDA and US farm policy. Rather than pulling that toe out and having the door slam in our faces, I suggest we need to push harder to get the NOP to take the NOSB’s recommendations. The NOP also needs to agree to criteria for the selection of NOSB members so that the advisory board continues to have members who truly come from the organic movement, before the Big Boys take over the NOSB. We are extremely fortunate to have people with integrity and extensive background in organic agriculture like Jim Riddle, Rosie Koening, Dave Carter and others on the board. The resignation of Willie Lockeretz from the NOSB out of frustration that the NOP has not taken their recommendations is a serious signal that the public-private partnership is in danger. An NOSB that does not have the support and resources to do its very demanding job of overseeing the materials list and the details of the standards cannot also find the energy to work at maintaining public trust in the program. If the NOP has a set of procedures guiding its accreditation decisions, it should make them public right away. Rather than making a one time contract with the American National Standards Institute (ANSI) to review its procedures, the NOP should appoint a peer review panel that will monitor its accreditation work over a period of years. Instead of improving our efficiency, this new combine in the field of organic agriculture may compact our soil and split our beans. We don’t have to passively allow this to happen.

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Vermont Organic Farmers- A Certifier’s View

Vermont’s organic certification program administrator talks about the changes the NOP has brought to the certification scene.

by John Cleary

As an organic certifier, I often curiously examine organic products in the grocery store, noting who they are certified by, which ones are mislabeled or misleading, and what percentage of organic ingredients they actually contain. I clearly remember the first organic product that I saw, a bag of Dole pre-washed salad mix from California, with the new official “USDA Organic” logo proudly plastered on the front panel. While my wife was less impressed than I was, I purchased the salad mix just so I could show it to my fellow organic enthusiast at the NOFA-VT office. This particular product demonstrated just how “organic” has changed over the past 20 years. Some changes are cause for concern (increased corporatization of organic agriculture) other are definitely positive (increased number of informed consumers buying from local organic farms). The success of organic products in the marketplace has driven these changes and eventually led to the creation of the USDA National Organic Program (NOP). On October 21, 2002 the NOP standards began to be fully implemented.

A little more than a year later, as I sit at my desk in the NOFA-VT office and look around, some things have changed. The piles of paper and stack of files are perhaps a little taller than they used to be, as we have had to increase the level of documentation of the certification process. Most of the increased paperwork, however, is here in the office, not on the farm. It has been a priority for us to keep the paperwork and cost of certification to a minimum for the farmer and hope other certifiers have done the same. Our files are now a bit more organized, as we had to prepare for a two-day audit from USDA inspectors. Conflict of interest forms, training logs, quality, policy and administrative procedures manuals are now neatly ordered and annual updates are sent directly to the NOP. We’ve hired a full time certification assistant to keep up with the dramatic growth in the number of farms applying for certification. There was definite concern from Vermont's organic certification program administrator talks about the changes the NOP has brought to the certification scene.

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All certifiers were required to receive NOP accreditation in order to continue their programs under the new standards. A major change to our organizational structure was required in order to meet the conflict of interest requirements for accreditation. Vermont Organic Farmers (VOF), which had formerly been the certification program of NOFA-VT was reorganized to become a limited liability corporation owned by NOFA-VT. This was required in order to remove the perceived conflict created by having farmers certified by VOF serving on the board on NOFA-VT. VOF now has a separate board made up of non-certified individuals. Historically, the certification program and standards in Vermont were created by the organic farmers as a way to clearly convey to the consumer the practices being used to produce their food. It was understood that these farmers were the primary most concerned with maintaining integrity in their industry and were the most knowledgeable about organic practices. The new standards in Vermont have now reached the point (for better or worse) where self-certification is no longer the case. VOF has tried to maintain our farmer connection by continuing to have the VOF farmers vote in any changes to certification fees and guidelines even though they no longer have control over the standards. The VOF Review Committee (which makes certification decisions) is still made up of certified farmers, but no longer has the same flexibility in dealing with individual issues.

Looking forward, there are still some major issues regarding interpretation and evolution of the standards that remain to be resolved. If we are to have a national organic program that maintains its integrity, the key lies in the National Organic Standards Board (NOSB). The NOSB, a fifteen member board appointed by the Secretary of Agriculture, has spent years making recommendations, clarifications, and interpretations to improve these standards.

NOP has now stated that NOSB recommendations can only be used as “guidance” and that they will not be incorporated into the standards at this time. The guidelines developed by the NOSB are therefore not enforceable. According to NOP staff, NOSB decisions do not become relevant to certifiers until accepted by the NOP and posted on their website as “policy.” Certification decisions can only be made based on the standards in the Final Rule, and not based on NOSB recommendations. This places the decision making power over changes to the standards in the hands of the USDA, rather than in the NOSB. While the NOP was required to accept public comment, the USDA can make these policy decisions without any public input. The NOP has stated that at this time the Final Rule itself will not be changed (other than some technical corrections and additions to the national list) and that any required changes may only be made through “policy statements.” A recent (and convoluted) policy statement about origin of livestock for dairy cows is an example of a policy that was put forwards by the NOP that contradicted the recommendation of the NOSB.

It is true that the NOP is under-funded and therefore reluctant to open up the national standards for new “rule making” (which takes at least 18 months) when they need to focus their resources on just getting the program off the ground. But now that we have had a program for over a year, we need to see that the NOP is re-affirming the role of the NOSB as a body with the organic expertise to oversee changes to the standards. In the meantime, the NOSB continues to work on the standards issues they were originally charged with, but are left wondering how or if their decisions will be acted upon.

Through all of these changes, Vermont Organic Farmers and NOFA-VT will continue to provide a quality farmer-based certification program. There is still a role for farmers to play in deciding how various national standards should be interpreted. Anything not clearly spelled out by the NOP is left up to the individual certifiers to decide on and the annual process of holding VOF standards meetings to make these decisions will continue. The innovation and integrity that the roots of organic agriculture continue to flourish in Vermont. Upholding these ideals is what we at NOFA-VT and thousands of organic farmers across the country are dedicated to.

John Cleary is the certification administrator for Vermont Organic Farmers/NOFA-VT.
Growing 3000 Organic Acres

A farming family near Buffalo is making a success of organic grain and vegetable production on a large scale.

by Jack Kittredge

New York is where the harsh agricultural environment of New England – thin soils and short seasons – gradually moderate into the fruitful embrace of the Midwest. In the Empire State, as you go from the Great Lakes to the topsoil deepens and the continental land mass gives you hotter summers and longer seasons. The soil becomes a silt loam, less acid because of higher lime concentrations. Although annual inches of rainfall drops into the 30s from New England’s high 40s, there is still enough to make New York the second or third highest producer (after California) of a long list of 25 or so vegetables. Near the Great Lakes are thriving wine grape and tree fruit operations. Around urban areas development pressure is squeezing farmland, but there it’s still plenty far out, unlike the situation in southern New England.

In Western New York, just a few miles east of Buffalo, the Kreher family has farmed for three generations. Now five brothers and two cousins run the family’s diversified agricultural operations that include 600,000 layers, a manure-based fertilizer operation, and now organic cropping on 3000 acres.

“We will have been in the egg business 80 years next year,” says youngest brother Brett Kreher. “My grandfather was a factory worker. He worked at a beveled gear factory, cutting the bevels. But I guess he liked farming, because my grandparents moved out from Buffalo in 1924 to East Amherst. In the 1920s a farm was a little bit of everything, chickens, cows, pigs, and such. But Grandpa liked the chickens. So from the 20s to the 50s he got more and more into the chickens and breeding them. Eventually Grandpa became a breeder.

“Then in 1950,” he continues, “Grandma and Grandpa, Dad and Uncle Don bought this Clarence farm. Over a long period we expanded here and shut down that Amherst farm down because it was surrounded by sprawl. Grandpa died in 1958 and I wasn’t born for another 9 years. When we were kids we had a big farm stand and we’d grow vegetables for it.

“We all pretty much grew up figuring nobody would come back to the farm,” he reflects, “probably because we had to work so hard. It was a time of struggle for my folks. That’s part of what you try to flee – the struggle. It’s okay if you feel you’re winning; but if you feel you’re losing, it’s a problem.”

The brothers all went to Cornell as undergraduates or for graduate work. Some became engineers, Brett studied agronomy and agricultural economics. Eventually they all came back to the family business after working in institutions like IBM or the Department of Defense.

“I don’t know why we all came back,” admits Brett. “It was one at a time. We all grew up here, we go to church here. We went to school here, now our kids go to school here. You get to be a member of your community. My father and uncle retired at the end of 1991. My parents still live on the farm – we see them every day. My uncle stops by to see how we’re doing. I guess we get along pretty well.”

The egg business is still the basis of the Kreher operation. When Brett’s grandfather started as a breeder, there was one in every neighborhood. By the 1950s there was one in every county. Then after 1950 and 1955 hybridization came in and the egg industry and the broiler industry went off in different directions.

“The breeding business has radically changed,” explains Brett, “to the point where there are only 4 or 5 commercial egg breeds sold in the country. I don’t believe a single one of those is owned by a US company any more. They’re all owned by foreign firms. The broilers go from hatch to slaughter in 5 or 6 weeks, whereas with egg laying hens it takes about 4 or 5 months to raise them until they’re ready to lay eggs. Instead of rapid gain, they’ve been bred to give a lot of eggs without a lot of feed.”

Egg business experts say you need 1 to 4 million layers to be competitive today. Growers now put up egg complexes in increments of 1.2 million hens. So the Kreher operation, with 600,000 layers, is already about half the current standard. But it took a lot of investment and energy to get there, Brett says, and the family is trying to stay as competitive as possible.

Mostly they buy in feed from neighboring dairy farms that grow corn for their cows and usually have a little surplus that they can sell. The chickens eat a diet that’s 70% corn with the balance soybean meal and other ingredients. The Krehers mill it themselves. They buy in day-old chicks and raise them until they’re ready to lay. They wash, grade and pack the eggs, and distribute them primarily to supermarkets, but also to food service companies.

An egg business, of course, produces a lot of manure. That can be a real fertility resource in farming, but it also produces odors that can get pretty intense, especially in an area which is gradually becoming more developed. In 1993, however, two of Brett’s brothers and a cousin went to Europe to look at poultry equipment and made a discovery.

As Brett tells the story: “They were looking at cage equipment but noticed that every farm they looked at was feeding their manure into an identical composting system. They went to a bunch of places and the composting operation was just across the driveway from the farmer’s house! The lack of offensive odors made a big impression on them, so they figured out the principles, came back and duplicated it here. It’s not a conventional compost because we don’t use a carbon source. It’s a partially composted, partially dehydrated poultry manure. If you wet it again, it doesn’t turn back into manure. But you want to keep it dry because if you moisten it up it will resume cooking.”

The family tests the compost periodically to make sure it is free of pathogens such as E. coli, Salmonella, and Campylobacter. Because their process doesn’t involve adding a high proportion of carbon, Kreher compost didn’t meet the original standards for organic compost. It would have been treated as manure and subject to the 90 and 120 days before harvest rules. But the NOSB recommended new organic compost standards last winter that allow the product to be treated as compost.

“They had to approve it,” Brett feels. “It’s a good product. It’s a lot cheaper than conventional manureregs that would have messed it up for vegetable growers. For example, our peas run 75 or 80 days from planting to harvest so we couldn’t use the fertilizer at all.”

About a third of the compost is pelletized in a separate pellet milling operation in an old barn so it can be dried and screened for a uniform particle size that will spread through a vegetable side dresser or any fertilizer equipment. The Krehers use that in their corn planter when planting in the spring. Brett estimates that they use a quarter of the compost on their own crops, especially stuff that might be too wet or dry or lumpy to send to customers.

“Corn is a heavy feeder,” he says, “so we put down one ton per acre on that. On soy we don’t use any because it’s a legume. This year we’re feeding our clover in the fall. It’s funny, you don’t think of clover as needing nitrogen. But last year we did an experiment and broadcast compost on our clover. Where we did that the clover roots were much more substantial than where we didn’t do that. It stimulated their growth.”

Once the Krehers started composting their poultry manure, they needed to sell the portion they didn’t use. At first they tried selling it to conventional neighbors, but that didn’t go very well. Eventually, according to Brett, some organic farmers got wind of it and bought some. As soon as that happened, sales picked up quite a bit.

When Brett first came back to the farm he got involved in the administrative end of it – payroll, personnel, record keeping. Then he started working with his cousin Don, who was growing crops, to see if better record-keeping might help them analyze their decision-making better.

“We weren’t very successful at growing crops,” recalls Kreher. “Our retained agronomist was telling us we weren’t working enough acres. So we chased that false line of thinking from about 750 acres up to 3000 acres. But that didn’t work. We chased a lot of different ideas – we weren’t getting the corn planted soon enough, so we got a big expensive 12-row planter. But that didn’t work. We weren’t rotating aggressively enough, so we started rotating aggressively. We chased all the concepts – deep tillage. All of it helps a little bit. But none of them added up to what we needed to get profitable. We were just treading water.

Eventually Brett decided to take a trip out to the Finger Lakes region to see the organic farmers who were buying their compost.

“The fateful trip was in 1998,” he recalls. We were selling to them and I figured that if you’re selling something you should go see your customer and how he’s using it. So I went out and saw the organic guys. Well, I didn’t believe what I saw! I stopped in and saw Larry Lewis. Towards the end of the day I went to John Myer’s farm, and then finished up the day at Tony Potenza’s. I rode around on the fender with Tony while he raked some hay and the more he talked the more fascinating it was.
Brett continues: “I said: ‘Here are guys like me. They’re sharp, but they’re not Bill Gates. And they’re successful.’ My understanding of organic was that you couldn’t win a fight with the weeds. But they were doing it. It just takes more skill. There was a community of organic farmers. If you have an individual who has something figured out, generally they keep it to themselves. But this was just the opposite. Tony’s first words to me were: ‘When are YOU going to go organic?’ I had spent the whole day seeing these operations and I couldn’t answer that then.

“When I came back from Tony’s in 1998,” he continues, “I thought I would meet some big hard brick walls of resistance. It was really shocking! The crops operation then was me, my cousin Don, and our crops manager Ron. I was thinking: ‘These guys aren’t going to like this. People don’t like change.’ But, Son of a Gun, it was just the opposite. It was like unshackling Ron, taking off the handcuffs. Don embraced it immediately, too. I think we’re fortunate here that we have a high degree of trust. Roger, Ron’s dad, had farmed without chemicals early in his life, and he talks about it. So Ron had a base there. That helped.”

The Krehers started the transition.

“In 1999, our first year,” Brett relates, “we grew 70 acres of organic soy beans. In 2000 we had a couple hundred certifiable acres, but they weren’t plantable because it was a monsoon year. In 2001 we grew 600 acres. We tripled every year. Last year we grew 1800. That was crushing work — a lot of Sundays in the fields. This year, even though we’re doing more acres, we have more, better help and we’re more experienced. Now we’ve hit the top so we’ve done the hardest part. But we wouldn’t be where we are without Klaas and Mary-Howell Martens and NYCO (the New York Certified Organic growers group). They’re mostly grain farmers in central New York, but they’ve been really helpful to farmers like me. You would think a guy as busy as Klaas would say: ‘I don’t have time for you.’ Instead he says: ‘Let me come out and I’ll try to figure out how to help you through this.’”

The Krehers farm a total of 3000 acres, 75% of which is rented. They grow corn, soybeans, wheat, sweet corn, peas, green beans, spelt, wheat (red and white), barley, oats, hay, clover, and barley or oats peas. (That’s a dairy feed blend of either barley or oats to which are added peas – the peas climb up the barley or oats and at harvest time you combine them together). They sell hay and clover to dairy farmers, but also have cut it and let it return to the soil. They struggle with whether to feed to cows or back to their own worms. One of the advantages of making hay is that you’re also clipping the weeds and shipping out those seeds. Brett reasons, but you want the green manure, too, to build your soil.

The Krehers employ about 50 full time and 50 part time people in all the different aspects of their business. In growing crops they have 5 full time and another 3 to 5 who flex in during high demand times. The bulk of the operation is still the egg business, but cropping is getting to be a bigger part.

In mid September, the soybeans are about three weeks from harvest. Before they are ready, the leaves must fall off and the beans need to dry up and
Kreher tastes a soybean to make sure the distinctive flavor is still there.

It hasn’t yet dried up and hardened.

Predicting yield in soybeans calls for skill in understanding the plant. According to Brett, you don’t want your bottom beans too low because the head of the thresher can’t get below about an inch and a half. Those will all be waste. Also, you want to see a lot of three-bean pods. Vintons, the variety Brett is growing, aren’t high producers but they’re high in protein, have a big bean size, and a good taste. Brett figures he will get an okay yield of about 30 bushels to the acre from his Vintons this year.

Kreher also talked a little about the other grains he grows: “Winter wheat is planted in the fall and you harvest it in the summer. Spring wheat is essentially the same thing but you plant it in the spring. Winter wheat comes up in the fall, then in the spring it gets back up and running fast, so it has a higher yield potential. Most people don’t plant spring wheat around here. It’s planted in areas where the winters are too cold and winter wheat would get killed off. Winter wheat can survive cold pretty well if you have a nice blanket of snow protecting it. But if your fields blow clear and then it gets down to zero, it’s no fun.

“My corn will go for animal feed,” he continues, mostly dairy, but some to poultry and hogs. It’s a Pioneer hybrid variety, picked for our daylength. Out in the Midwest you might plant 114 growing degree corn. But here you might plant 95. We have a little shorter growing season. If you go up into Maine it would get knocked back to 85 or even 75. There’s lower yield potential in the shorter day length corn. Shorter growing seasons mean smaller ears, that sort of thing. What you want is long ears, bigger around so there are a lot of rows. This is 14 row corn. You can get 16 or even 18 if you grow corn on good land. It’s not consistent, but you can get it. You want good kernel depth as well.”

The corn is harvested about mid-October, when it’s dry enough that Brett won’t have to do a lot of extra drying. The Krehers average about 100 bushels to the acre for corn, although last year, on his best rented land, Brett grew 128 bushel/acre on one piece and 138 bushel/acre on another.

Some of the family’s soils are poorly drained. On conventional crop prices it didn’t pay to put in drainage, but on organic prices Kreher says that situation may change. Marketing their crops isn’t a problem, although the family is still sorting out which companies they want to sell to. Weeds are probably the biggest problem in the cropping operation. They have had some insect problems, like leaf hoppers on green beans, but not many.

Kreher notes some fundamental differences between raising grain and vegetables. In grain farming, he says, land is just a commodity. You pick up this parcel and drop that one. It’s not so intensive – you
use a lot more acres, but put fewer dollars per acre into it. In vegetables, however, the farmer needs to pay a lot more attention to the soil — know what has been planted there the last 10 or 15 years, how it has been built up.

Growing organically is a lot more work than growing conventionally, Brett feels. To grow a crop of conventional corn they would chisel plow and right away hit the field with one pass of secondary tillage to level it for a seedbed. Then they would spray with an herbicide right while planting, after which they could forget about the crop until fall.

“It was dumbed-down farming,” he says with a shake of his head. “What we’re doing now is a lot more intensive. For some reason the chisel plow seems to give us a lot more weed problems, so we went back to moldboard plowing. The mold board flips everything over whereas the chisel sort of stirs the soil. We flip under weed seeds and what we’re flipping up doesn’t germinate as well, perhaps because the soil organisms have been working away at it the whole time it’s been under the soil.

Kreher’s sweet corn, beans and peas are grown on contract for processors. This guarantees him a market for the harvest, and lets the processor set a planting time that assures a smooth flow of product to the processing plant. In order to assure product quality, processors traditionally supply the seed and, if their thresholds for insect damage are crossed, come out and spray the crop themselves. This is the arrangement for both conventional and organic growers. With the organic ones, the materials sprayed are things like Bt that are approved by OMRI.

The Krehers sell their field corn to dairy farmers and their soybeans go to tofu and soy milk processors. This year they are growing Vintons for tofu. Last year they sold to a large company that does a lot of soy milk. Wheat goes to bakers, this year to a Canadian bakery. Sweet corn, peas and green beans go to vegetable processors, right now to a conventional vegetable processor who is feeling out a little niche in the organic market. Spelt goes to flour for bakers, barley and barley peas to cows. Oats still go into feed, but Brett thinks it’s just a matter of time before they get a food grade market opened up for oats.

He says the price differential for his crops between conventional and organic is roughly double. Almost everything is already contracted for before it is harvested. If he raises more or less vegetables than he expected, the processor buys what he has and absorbs the variability.

Brett isn’t convinced that the adoption of the National Organic Program has made a huge difference for organic growers, but he does recognize an increase in the credibility given organic methods since the federal government got involved. Asked about the success of organic foods in the marketplace, he says its continued growth has surprised everybody. The smart money was predicting it would reach a certain point and then stabilize. But it has continued to expand market share and eventually people started noticing.

Kreher has talked with a lot of his neighbors about organic methods. “People used to scoff,” he says, “but they don’t anymore. They say: ‘We’ll watch it.’ Mostly I’ve talked to our dairy farm neighbors.
There’s a lot of demand for organic milk in New York, but we import it from out of state! Around here there are a lot of big dairy farms, and it’s harder to go organic if you’re big. It’s easier for the small farms. But there also has to be the energy and enthusiasm to make the transition. A lot of my neighbors are just burned out. I talked with the last dairy farmer in Clarence, but he said: ‘I’m just too tired.’ So he sold out and now he’s driving truck. All that talent and skill are no longer in use.”

In some ways, Brett feels, the Kreher egg operation is a lot like one of those big dairy farms. Feeding organic grain wouldn’t be a problem, but the existing structure would be very hard to change. Outdoor access would be hard to provide, and there would be health problems. With chickens in cages the manure drops through, so you don’t have a parasite problem. But organic birds would all have to be floor birds with nest boxes, so disease and parasites would be a problem. You’d have to learn how to handle that without the drugs and parasiticides that used to be used in conventional poultry operations before cages.

“You could raise birds on pasture,” Brett admits. “There’s a large transitioning farm out in Michigan that has 100,000 organic chickens for eggs – Herbrucks Poultry Ranch. They know how to do it. They have two or three million layers. They’re big. But I’m told a hundred thousand of them are organic.”

The Kreher’s crops are certified by NOFA-NY, and Brett says he has been very satisfied with the relationship. “It’s been fantastic,” he says. “But being NOFA - certified didn’t work for big growers back before the NOP. Buyers in other areas of the country hadn’t heard of NOFA. It’s easier to sell to my new Canadian wheat customer because of the NOP.

“I think the most substantive thing the NOP will do,” he continues, “is help the processors. There used to be a complicated cross certification where one certifier would add its certification to another one’s on the same crop so it could be accepted by certain buyers. But now a big national processor can get peas, beans and sweet corn from a NOFA farm in Buffalo, and baby carrots or broccoli or cauliflower out in California. They can blend it all together in one bag and use the NOP logo. I think that will help the large scale vegetable processors.”

The soy plants here are Vintons – a variety preferred for tofu. They have plenty of pods, many of which have three beans – a sign of a good yield.
The National Organic Standards Board
an Ex-Member’s Experience

Deck: An Ex-NOSB member tells of his frustration with the NOP.

by Willie Lockeretz

When I was appointed to the National Organic Standards Board in May 2000, I approached my new role with great enthusiasm, delighted to be part of an important effort to help organic farming thrive. Exactly two years later, thoroughly disillusioned, I quit.

The problem was not the Board. Quite the contrary. I very quickly developed immense respect and admiration for my colleagues. I was impressed by their collective knowledge of every aspect of organic farming. Even more impressive was their thorough dedication to their task; I estimate that if one counted all the meetings, conference calls, reviewing of reports, and so forth, each member easily devoted the equivalent of a couple of weeks per year, all unpaid, and all contributed cheerfully. Admiring, too, was the way the members restrained themselves and sought common ground, even in potentially divisive issues. Absent from the Board’s meetings were any grandstanding and posturing, although the Board often debated subjects that aroused strong feelings in the organic community. Finally, the Board continuously examined its own operation, always seeking ways to work more effectively, more accountably, and more transparently.

No, the Board was not the problem. The problem, very simply, was the National Organic Program, which by statute the Board was supposed to advise. Unfortunately, the NOP consistently ignored that advice.

The drafters of the Organic Foods Production Act of 1990 (OFPA), which established the National Organic Program, were very wise in providing as well for a National Organic Standards Board. Moreover, the Board’s role was to be much broader than that of most federal advisory committees, which often deal with narrow technical issues. Besides having particular responsibility for deciding which materials should or should not be allowed in organic food production, the Board’s role was to advise on “any other aspects” of the program.

And appropriately so. Developing organic standards and suitable procedures for enforcing them is very difficult. It requires an understanding of both crop and animal production, as well as food processing, distribution and marketing. This in turn requires a knowledge of subjects ranging from soil quality and pest management to animal health and welfare to food labeling. The Board, in keeping with the requirements of OFPA, collectively has wide-ranging expertise in these areas; more so, I dare say, than does the NOP staff.

Moreover, organic farming also involves values and worldviews. Granted that today, with legally binding standards in force, the NOP’s role is primarily regulatory. Nevertheless, it is futile to try to develop efficient and acceptable standards and regulatory procedures without appreciating the organic values that should underlie them. Although regulatory language must be coldly objective and hard-edged, in the case of organic standards there is a spirit that pervades them as well. To do the job right, therefore, one needs to understand and appreciate that spirit. Here too, the Board, by virtue of its members’ first-hand involvement in organic affairs, not just their technical knowledge, brings to the process something that the NOP staff lacks (although with some individual exceptions). A side benefit was that the Board commanded the respect of the organic community and thereby added badly needed credibility to the NOP, which some segments of that community looked upon as merely a heavy-handed bureaucracy.

Despite the great promise of the Board, I left it when I realized, in May 2002, that the NOP had not taken action on a single recommendation that the Board had made in my two years on it. Moreover, I got the distinct impression that the NOP regarded the Board as irrelevant at best, and at worst an obstruction, even though we all clearly were working towards a common goal - a thriving organic agriculture - and even though the Board was picking up much of the work that the understaffed NOP could not handle. The tone of NOP’s communications with the Board, both public and private, ranged from dismissive to condescending to overtly disrespectful. (Again, I must add that this definitely was not true for every member of the NOP staff; many of whom were very appreciative of the Board’s contribution and sought to maintain a collegial relationship with it. I am speaking of the NOP as a body, in its formal, official functioning.) Sometimes the NOP even obstructed the Board’s activities, as when it barred the presentation of the results of a survey that the Board’s Livestock Committee had conducted of certifiers of organic dairy farms, even though the NOP knew about the survey in advance, and in fact had participated in several discussions of it.

What a pity. How unfortunate that a program that is so important for the development of organic farming in the US has so consistently failed to take advantage of this marvelous resource.

Given the expertise and backgrounds of the Board’s members, it is not surprising that it offered a wide range of recommendations on important business left unfinished in the final standards of December 2000: elaboration of the standards for composting; access to pasture for ruminants and access to various other farmed species; acquisition of wild fish and wild plants; replacement of dairy herd replacements; standards for bee-keeping; and whether wild fish may be called organic (recommendation: no). All were developed with considerable thought and discussion, always with substantial public comment, and often with additional help from outside experts.

Yet the NOP has not acted on any of these recommendations. By that I do not mean that it hasn’t accepted any of them; no, it hasn’t acted on them not even to reject them. I almost feel that rejecting them – with an explanation – would have been better, because it would have kept the issues alive and clearly drawn the lines of the debate. But the NOP has simply ignored them, leaving them in a bureaucratic limbo from which, apparently, they may never emerge.

Fortunately, organic standards can be continually improved, and past gaps still can be filled. We now have over a year’s experience with how the first standards have worked in practice, experience that could be very valuable in improving them. The NOSB still can be an important contributor to that process, provided the NOP recognizes it for what it is – potentially a very valuable asset. If it fails to do so, it will seriously jeopardize its credibility and effectiveness, to the great detriment of America’s organic farmers and consumers.

I hope it does so before it’s too late.

FOR SALE – Shares in 120 acre land trust, Wendell, MA
entitle holders to build on land leased from the trust and to participate in the development of a small, rural neighborhood. Two existing homes, organically certifiable fields and forest land adjacent to large tracts of conservation land are now managed by six share-holders with potential for four new share-holders.

Call 978-544-2623.

Willie Lockeretz

photo courtesy Willie Lockeretz

Winter, 2003-04
Most of you reading this article are small, diversified organic growers, just like me. I’m proud of that. Collectively, we are the true “soul” of organic. We’re the ones who suffered the initial losses and spilled the extra sweat necessary to prove by example that our nation’s veggies really CAN be grown organically with the yields and quality necessary to be commercially viable.

We’ve watched organic grow from the smallest niche marketing label to the present national standard that is embraced and sought after by thousands more consumers each year. It is because of our idealistic efforts (and success!) that agribusiness farms are converting thousands of conventional acres into less toxic and more sustainable USDA Certified Organic acreage. How cool that corporations like Phillip Morris, General Electric, and even Monsanto are investing in at least some version of organic agriculture.

Certified Naturally Grown

This alternative to the NOP attempts to support small and local organic farms with a practical, affordable inspection and certification process.

Of course, some of us small farmers are lamenting our apparent success—and for precisely the same reasons. Is it really so great that 80% of the Certified Organic products sold in this country come from big agribusiness, rather than the original small diversified farms? And how disturbing that many of our original inspiring rebellious pioneering organic farmers are now forbidden by law to tell their customers that, yes, they ARE still organic until and unless they agree to buy into the system of mandated fees and fill in all the right cumbersome paperwork? And oh that paperwork! While big agribusiness breezes through a couple dozen pages for their 1000 acres of carrots, we easily fill 100+ pages trying to describe our so much more sustainable and diversified operations spread out over multiple small fields totaling 8-10 acres.

Sometimes it really seems like all our worst-fears materialized... but then again, isn’t it also our greatest hopes come to life? “New Organic” is truly proving all the chemical nozzle-heads wrong. As I watch wholesale organic prices for garlic, carrots and lettuce drop lower and lower (sometimes even below conventional wholesale prices this season!) I’m not sure if I should just give it up and go back to bed, or start dancing around in giddy excitement over the fact that organic veggies really can be produced cheaply enough to feed the masses.

It’s no wonder so many of us small farmers have taken to drinking our apple-cider hard. But are we supposed to be toasting our success as world-paradigm-changers or just getting drunk enough to numb ourselves to the pain. No doubt it’s a confusing time, but I say we celebrate. Did any of us go into organic farming because we thought it would be easy? No way! If the bureaucracy of “New Organic” has given agribusinesses an advantage, then so what! We needed new challenges anyway. The question is how can we look forward to further improve things; further raise customer awareness, and further prove the workability of an even more sustainable system of agriculture.

We started the Certified Naturally Grown network to be one part of “the next step.” Certified Naturally Grown is a label open ONLY to small organic farmers (both certified or uncertified) that sell their produce locally and directly -through farm stands, farmers’ markets, CSAs, to restaurants, or to small local natural food stores and coops that feature local food. Our focus is entirely on providing a credible certification alternative that highlights and embraces the needs of small direct-market farmers. Although we use the publicly available USDA NOP growing standards, Certified Naturally Grown is not affiliated with the USDA National Organic Program, so we have a lot more flexibility in how we implement the certification process itself.

Most of the application process is based on-line. Farmers interested in joining the program fill in an online web-based application. The computer then generates a customized grower affidavit and inspection forms and finds a volunteer farmer-inspector to do an on-site inspection.

Paperwork and record keeping are kept to the barest minimum. The fact of the matter is that farming is a very solitary profession. Farmers that WANT to cheat can and do even within the NOP program because they maintain their own records and obviously don’t record their own transgressions.
Another difference between the Certified Naturally Grown program and the NOP is how the farm inspections themselves are carried out. Certified Naturally Grown most often uses volunteer farmers to inspect other farms. To discourage fraudulent "trading" of inspections, you are only allowed to inspect a farm other than the one that inspected you. So it always takes three years to finish an inspection round: Farmer A inspects Farmer B, Farmer B inspects Farmer C, and Farmer C inspects farmer A. One of the two farmers mentioned above using chemical fertilizer wasn’t able to join the Certified Naturally Grown program because there were no local farmers willing to do the inspection for them.

Neighboring farmer/inspectors who are more likely to regularly and randomly visit their neighbors, and are intimately familiar with pest pressures in a given week can be more aware (and better deterrents) of cheating than a more distantly based professional inspector who only comes for a few hours a summer –and that usually at pre-scheduled times.

Finally, as an additional check, 10% of Certified Naturally Grown farmers are tested for pesticide residues at their point of sale. The cost of pesticide residue testing seems like a deterrent or real "random sampling" that’s arguably what happened in some cases this year, and to avoid this we’ll have to be much better prepared for next season.

Another challenge is, of course, financial. The program was run on an entirely free-will donation basis this year, with recommended donations ranging from $20-$100, and that worked out pretty well, but even with all-volunteer staffing we didn’t quite cover all our costs, AND it didn’t put us in a strong position to finance some of the more complex programmed changes and improvements that we’d like to make. The program will need to maintain the "free-will" nature of contributing to the program, we may need to be a little more encouragement.

Perhaps the biggest challenge we face is in walking the fine-line between educating consumers as to the importance of supporting local certified/uncertified organic farmers VS. becoming bashers of "new" Organic" large-scale agribusiness. Our latest attempt to stay the high road is by equating the NOP to a lawnmower, and Certified Naturally Grown to a weed whacker. The NOP is a fast, easy, and cheap big acreage fast, of course you choose the lawnmower. It can’t be beat. But if you are in smaller, tighter spaces with lots of diversity, flowers, small trees and shrubs… then while the lawnmower still can get in there to do the job, it may also knock off some bark and take out a couple flower stalks…Instead, you may feel it’s worth the small cost of the weed-whacker (which of course would NOT be right for use on the whole lawn). Certified Naturally Grown can never pretend to be a replacement for the rigorous and structured certification practices mandated by the USDA, but by just sticking with small, local, direct market organic farmers, it doesn’t need to be.

We’ve even started to work more closely with some accredited NOP certification folks interested in putting their certification application record-keeping online using a program similar to the one that manages Certified Naturally Grown record-keeping. In addition to reducing the cost of certification (and speeding up the process), if farmers could be convinced to (accurately) maintain their certification records on-line, it could provide us with an enormous amount of farm-practices and yield data that could help to direct more specific research projects that may help all of us to farm better!

Support for Certified Naturally Grown has been tremendous. Regional newspapers know local farms and farmers play well, and as farmers across the country sign on to the program, often the local newspaper does an article on the program, and then more generally on the importance of local agriculture. Certified Naturally Grown has been on National Radio twice, once on television, and more recently made it up to national publications like Mother Earth News and “E” Magazine. Organizationally, partnerships with local-food advocacy organizations like localharvest.org have given us big boosts forward. But, by far the most exciting and recognizable support has come from the Atlantic Chapter of the Sierra Club, which has also been a tremendous resource in terms of providing “consumer feedback” to program policies.

In the three farming counties of the Hudson Valley that surround us, a phone survey we did last fall showed that 75% (26 of the 35) commercial organic farms that Cooperative Extension helped us to track down had decided NOT to become NOP certified for 2003. Certified Naturally Grown exists for that majority who remain committed to the ideals and standards of organic agriculture but aren’t sure they can afford the rigorous and structured certification practices mandated by the USDA, but by just sticking with small, local, direct market organic farmers, it doesn’t need to be.

If you are interested in more information about the program please check out the website at www.naturallygrown.org or email info@naturallygrown.org.

Ron Khosla is executive director of Certified Naturally Grown
Why We Certify

by Mary-Howell Martens with help from Klaas Martens

This column first appeared as the October, 2003, installment of “Letter from New York” at www.newfarm.org

“Come On, Mom, go faster! There’s never any cops along this road and we’ve got to get there!” My son’s urgency made a certain amount of sense. I’d never seen a police car along this stretch of backroad that was arrow-straight with good visibility, and getting to our destination early had definite advantages. My foot eased down on the gas pedal as I watched the speedometer rise to 60, then 65.

But suddenly, it occurred to me that this was not much different from obeying organic standards. I doubt there is a single person driving a car today who watches the speedometer or the road without a seatbelt at times, even though we all know we shouldn’t. But when we really have to get there and no one is watching . . .

Recently, New Farm held a poll on organic certification, asking farmers whether certification was “worth it”. Leading the results, two answers basically were tied — “No, its not worth the trouble” and “Yes, because I believe in it”. This strikes us as intriguing, since neither of the leading answers reflect a marketing decision, which is of course what USDA thinks organic is all about.

But I am concerned that a survey like this also reveals a deeper philosophical challenge in the organic community: What indeed is the point of organic certification today? Is it merely to get that magic certificate that will bring a premium price? Or is it to follow the rules because they will make us superior farmers, improve the environment, and are better for our health and the health of our children?

How do we keep organic certification from heading the way of certain traffic laws - following the rules only when we think we might get caught?

How indeed can we refresh organic farming’s philosophical roots in today’s Brave New NOP World?

Where Did American Organic Certification Come From?

Let’s start at the very beginning, or at least, let’s go back about a hundred years ago. The philosophical roots of American organic certification standards can be traced through several ‘family trees’.

In the early 1900’s, Rudolph Steiner in Germany developed an agricultural philosophy that came to be known as Biodynamics. He recognized pure food from a healthy earth was essential for human health and agricultural sustainability. Biodynamics is centered around the ideal of a self-contained farm, there should be just the right number of animals to provide manure for fertility and these animals should be fed from the produce of the farm. Steiner also introduced what are known as Biodynamic Preparations. Naturally occurring plant and animal materials are combined in specific recipes at certain seasons of the year and then placed in compost piles. These preparations, when used correctly, bear concentrated energetic forces that restore soil health, biodiversity and balance.

At the same time in Japan, Mokichi Okada advanced a similar concept that he called Nature Farming. Like Steiner, Okada recognized the connection between soil health, pure food, and a well-balanced spirituality. Compost also plays a key role for soil management, but unlike in Biodynamics, Nature Farming typically does not utilize animals, it does not put the same emphasis on crops grown for animal consumption, and avoids the use of animal manure and waste products as soil amendments.

In early to mid 1900’s, scientists and agriculturists from many places were developing similar alternative agricultural concepts, often in opposition to the coming of agricultural chemicals after World War II. Dr. William Albrecht, Louis Bromfield, Sir Albert Howard, Lady Eve Balfour and others all promoted a healthy soil and well-planned crop rotation as the basis of productive sustainable agriculture, recognizing with concern that agricultural chemicals damaged soil life and long-term soil health.

During the 1960’s, the Back to Land movement brought many non-farmers to the land, often without an agricultural background. These new farmers frequently came with strong philosophical, political and spiritual motives and limited financial resources. They generally avoided chemicals, outside inputs and large equipment, working small acres to produce fresh market fruits and vegetables. Vegetarianism, frequently a part of the Back to Land movement, recognized that the best tasting, highest quality food was grown in a natural, non-chemical environment.

One man, J. I. Rodale, was extraordinarily instrumental in pulling these threads together for American organic pioneers. Influenced by proponents of Biodynamics and Natural Farming, along with the early organic agriculturists and European organic developments, Rodale wrote numerous publications that promoted crop rotation, avoidance of chemicals, and soil health as the foundation for agricultural sustainability and human health. The Rodale Institute and California Certified Organic Farmers (CCOF) were among the first groups offering American organic certification, as buyers and farmers increasingly demanded uniform verified evidence for organic claims and a definition of what ‘organic’ meant.

The California Organic Foods Act of 1979 was considered by many to be the de facto national organic standard for much of the 1980’s. In the East, farmers and non-farmers in MOFGA and the NOFA’s worked closely together to reach agreement as an OCIA chapter. Those last years of the 1990’s were heady times of rapid growth and of terrific astoundingly well and we all were so impressed! We cooperated with other New York organic farmers to form New York Certified Organic so we could learn together to develop a farmer-friendly and farmer-supportive certification, initially as an OCIA chapter. Those last years of the 1990’s were heady times of rapid growth and of terrific positive reinforcement - our experiment had worked astounding well and we all were so impressed! Because we believed so strongly in organic farming and in the integrity of organic certification, we had
little doubt that everyone else in the organic com-

Where Are We Now?

Many people will say that the coming of the Na-
tional Organic Program changed everything. It hasn’t, but the NOP has changed many relationships and attitudes subtly, markedly altering the balance of power and influence in the organic community. Much of the change has been for the good, but not all.

For us, the NOP has neither changed our farming practices significantly nor our commitment to organic certification. We are still trying to find better ways to farm organically and to manage our soils and rotate our crops more productively. The past 4 years of extreme weather have certainly challenged our understanding of organic processes. Things that worked under the conditions of the late 1990’s have not always worked well under the extreme wet of 2000 and 2003, nor the extreme dry of 2001 and 2002. We’re also seeing that some of the soil fertility practices that worked well when we first started organics need to be altered and re-

Regardless what the weather brings, it is still important to us to stay strictly within the organic certification boundaries. We do this, not because we fear surveillance and enforcement, but because we believe organic standards generally guide us to doing the best thing for our soil, our crops and our environment. Occasionally though, we question whether using some practices outside organic standards might actually be better agronomically than using allowed ones. Take for instance the Great Potassium Dilemma. Because of the succes-

of native potassium in the soil, but our soil tests show it dropping precipitously and our crops can’t get it at without good microbial activity. So, how do we supplement potassium within organic stan-
dards? Potassium sulfate would be the best choice, it is the easiest on the soil, but the only mined source we could find locally had been treated with a petroleum-derivative as a dust suppresser. Our source we could find locally had been treated with a petroleum-derivative as a dust suppresser. Our

potassium is allowed, but it hard on the soil, especially on the very microbes we are trying so hard to stimulate. In our minds, potas-
sium sulfate would have been the better agronomic choice, but muriate is what we have had to use to stay within the standards.

To be perfectly honest, it would be quite easy to get away with using prohibited materials or practices on our farm. The inspector is here for only a few hours one day a year - it wouldn’t take much effort to make sure they never see anything suspicious, for after all, too often the assessment of organic integ-
rity seems based primarily on the “if it says so, then it is so” mentality. However, what would be the point? We follow the organic standards because we WANT to, not because we HAVE to, and certainly not because the government, our certifier or the inspector is looking over our shoulder. We still believe that the vast majority of organic farmers feel this way too, but unfortunately there are exceptions. We find it interesting that as new Organic Trade Association members, we were expected to sign the OTA Code of Ethics which, among other things, obligates us to report organic fraud if we know about it. Not a comfortable position to be put in! But this is particularly interesting since a friend who works in certification once told us that inspectors most often pick up mistakes or poor judgement, whereas outright fraud is usually reported by neighbors or buyers.

That’s the Big Stuff, but with deep concern, an inspector friend of ours recently spoke of what he calls “an increasing level of sneaking non-compli-
ance” - an attitude of seeing how little you can get away with, a “one foot just under the fence” mental-

ity. He feels this represents a pervasive shift in attitude among both new and long-time organic farmers and processors because the teeth of enforce-
ment are sometimes actually less effective under NOP. Certifiers are now in hot competition with each other to keep clients and keep costs down, sometimes there appears to be a lack of desire to alienate customers with stern warnings and sanc-
tions. A minor non-compliance is not very serious, usually not enough to cause decertification, so most punishments may not be sufficient incentive to “toe the line". Also, because organic certificates no longer expire, this year has seen a surprising number of producers who have simply not applied for annual renewal. They still hold unexpired certifi-
cates that make their products salable, buyers don’t necessarily know if a producer has renewed, and under NOP, it is hard to use the lack of renewal to take away a certificate. There is also concern about the attitudes of new large conventional companies getting in, wanting part of the organic action but not honestly valuing organic as anything intrinsically different.

This undercurrent is a serious concern to anyone who respects the integrity of the organic system, but to address it adequately, it is essential to consider where it may be coming from.

Improving Things - Now

Organic certification at its best is like good parenting. OF COURSE: it is important to have strict but sensible rules that, when followed, lead to good productive acceptable behavior. But children respect parents who administer rules fairly with understanding and caring, frequently rules must be explained and repeated with patience, and there must be enough flexibility to recognize that all situations are not equal. Occasionally, punishment will be necessary but as a last-resort way to better explain the rules and not in an arbitrary spirit of vindictiveness or simply to prove who’s in charge.

In our opinion, the very best solution for non-

compliance problems is strong proactive education
and a supportive local organic community. A farmer is much more likely to comply to the letter of the law if they understand how the standards will make them better farmers. Educating a farmer on the agronomic value of crop rotation and helping them find additional markets for more crops will usually ensure that they comply wisely. Understanding a farmer on what soil fertility amendments they can use for different problems will usually ensure they choose something allowed. Educating a farmer on good pasture management, pest management, animal health care will usually ensure that they will have healthy animals that don’t need antibiotics. Educating and helping a farmer develop an appropriate audit trail will usually greatly improve record keeping. Re-minding a farmer regularly of all the rules and requirements will generally ensure they make better decisions when challenged. Most of this information is simply not intuitive and very few farmers are eager to spend long hours digging the information out. Simply knowing that a local community cares and is both helping and watching will usually make decisions more honest, 365 days a year.

Unfortunately, NOP rules prohibit both certifiers and inspectors from “consulting” or providing information about overcoming barriers for certification. This has meant that the usual channels of accurate certification information and education have largely dried up. While certifiers are permitted to present certification information through newsletters and group meetings, many of the certifier newsletters we have seen this year seem to contain less truly useful certification information and are coming less frequently. We can somewhat understand why this provision was added to the NOP: neutrality is certainly important, but unfortunately it is already producing a lower educational and awareness level which will invariably lead to greater non-compliance and unintentional. There is a serious need for accurate information and education that no one is now filling.

Equally important though is that many farmers are losing a sense of respect for certifiers and the organic certification system. Without respect, it becomes very easy to justifiably grade-certifiers. We all know that lack of respect for ‘cops’ often is one common justification for disobeying traffic laws. How can we maintain respect throughout the organic community for the authority of organic certification, when frequent derisive talk and articles about NOP staff and their decisions, and about schizophrenic, unresponsive or lax certifiers convey a message that certification authorities do not deserve respect. Even if we personally have no intention of being non-compliant, our listeners may draw a very different conclusion from our approach.

Perhaps in some ways, as a community we may be reaping what we have sown. I am reminded of an article I once read in the Amish magazine, Family Life (Pathway Publishers, Rt. 4, Aylmer, Ontario N5H 2R3 CANADA, or 2580N-250W, LaGrange, IN 46761 USA), that said if parents are disrespectful of a teacher at home, almost invariably the child will be disrespectful of the teacher at school. It is important for the leaders of the organic community to show respect for the certification system and for the NOP supervision, even if we don’t always agree with it. Without an environment of respect, the level of ‘sneaking non-compliances’ is likely to increase at an even more distressing pace. But, it is also equally critical that the NOP staff, the NOSSB and the certifiers are worthy of this respect.

Does this mean that we all should be brainless Pollyannas, cheerfully accepting whatever comes down the line? Of course not, we have a serious responsibility to make sure that organic certification is the very best it can be, and when we see problems, we have a responsibility to address them constructively, and patiently, with people, not with protests of anger. Change must be done in a respectful manner, so that the wrong message is not passed on to others inside or outside the organic community. Most of us are trying our hardest to do a good job in an imperfect world, even when our efforts may seem misguided or inadequate to others!

Several years ago, at a conference at the Rodale Institute, we heard Bob Anderson, formerly of Walnut Acres and of the NOSSB, speak eloquently on certification under the organic system, as the playing field levels and certifiers have to compete head to head for customers, two factors will ultimately determine which certifiers are successful. First is SERVICE - being responsive, consistent, fair and transparent with their customers, answering questions, providing information and providing certification services in a farmer-appropriate manner. The second factor is VALUE - providing all these services at a competitive and fair price.

Recently a friend told us that one certifier had quoted him $8000 (all fees including inspection) to certify his 30 acres of corn and soybeans. Obviously no one had considered whether this was an appropriate fee for the potential income! Come on, folks, let’s get real, farmers aren’t rich, especially not this year! Certifiers might want to determine what percent of organic farm income that certification is worth (1% ?, 5% ?) and then make sure that ALL fees do not exceed that total percent, regardless of what method they use to calculate their fees. But, farmers also need to realize that there is a heck of a lot more work involved in processing their certification from start to finish than they realize!

Bob Anderson likened certification decisions to how a farmer buys a tractor. The dealership offering the best service and value for the product most suited to the particular farm will be successful. Other dealerships may offer similar products, but without on-going farmer support service and value, they are not likely to be chosen.

Unfortunately, service and value don’t always also include high INTEGRITY. Relaxing certification surveillance and enforcement may reduce costs and attract a certain type of customer but that will not usually engender respect. Some certifiers may make it unduly easy for an operation to certify, especially large operations that will bring in substantial user fees, while other certifiers will make the process more difficult. But true respect is something that must be earned. Hopefully those certifiers that fairly and constructively exercise their INTEGRITY, while still providing good service and value, will ultimately be ones the most respected.

Where Are We Going?
The National Organic Program, now a year old, is here to stay. This is where we are, it is not a choice. As a community we are committed to a consistent uniform definition of what ‘organic’ means.

Is it perfect? No, of course not. There are “up” sides and “down” sides to the new NOP system and there have been some well-publicized stumbles along the way this year. The certifiers are under greater supervisory and enforcement than was strictly and more even administered, some wish it was less strict, and many wish that more NOP resources were better allocated to combat non-compliance at all levels. No doubt at times, expectations of the NOP have both exceeded and underes-timated reality, but for the most part, we feel the overall trend has been positive.

We do worry that currently there is a real potential of losing the forest (integrity of the overall system) for the trees, or of more and more, which are being sporadically supplanted by non-certifiers who, although they may be better at some of the NOP requirements, are selling increasingly industrial leaf (approval of individual minor ingredient) products. Far too much effort is being spent on approving inputs, which are, of course, better at some sound organic system should be taking us away from. A fine example of this is algae, an excellent product for stimulating an animal’s natural defenses and avoidance antibiotics, which is currently being prohibited by some certifiers because it contains trace amounts of potassium sorbate as a preserva-tive. Hopefully there will be ways for the organic system to evolve as we learn more, becoming more inclusive of some materials that may not fit strictly within the current organic confines.

We must not forget that organic certification was far from perfect before the NOP. turf battles, superior-ity complexes, and inconsistent standards and enforcement were all too common. At least now no longer are OCA dairy farmers prohibited from using NOFA-NY hay, no longer do NOFA-NY farmers have to get document reviews approved before using OCTA hay. There is still a distressing amount of variation between how different certifiers interpret and enforce the same basic NOP standards, but hopefully that will even out in the next year.

The organic community is a much more diverse place than it was just 10 years ago, making commun-ication and agreement even more difficult. But hopefully that will even out in the next year. As we face these new challenges, hopefully we can see how our organic community can be a great force for the increased diversity and that we must learn to respect each other for our unique contributions.

Why do we certify? Quite aside from the fact that our buyers and the government now require ‘or-ganic’ to mean ‘certified organic’, we still believe that the discipline of organic certification is worthy of this Brave New NOP World, is definitely worth it and that it makes us better farmers. And we still feel strongly that working within the system to improve organic certification is also absolutely critical.
We Have A New Certifier, NFC!

We are pleased to announce that we have just received organic certification from Natural Food Certifiers of Spring Valley, NY. We left NOFA/MASS Certification because we were in deep discord as to how to “access to the outdoors”. Under the new NOP (National Organic Program) regulations, animals must have access to the outdoors.

NOP Approves Porches

We originally applied to the NOFA/MASS Certification under the new federal NOP regulation. We were approved for all factors except for the issue of porches. We appealed to Washington, DC and we were upheld in our position. NOP instructed NOFA/MASS Certification Program, which had previously been silent for legal reasons, puts in its 2 cents about The Country Hen and the NOP.

Finally the NOFA/Mass Certification Program, which had been in deep discord as to how to “access to the outdoors”. Under the new NOP (National Organic Program) regulations, animals must have access to the outdoors. Verena turned to the idea of porches. We appealed to Washington, DC and we were upheld in our position. NOP instructed NOFA/MASS Certification to consider the idea of porches. Not exactly. The issue was not a porches. We basically refused to do so and started a lawsuit against the NOP - The Department of Agriculture.

To avoid unending conflict, we searched for a new certifier who was more practical in their outlook. We found NFC and explained to them why we felt chickens were different than cows, pigs, sheep and steers when it comes to diseases and the outdoors. Wild birds and especially waterfowl are particularly dangerous because they carry AI (Avian Influenza). Recently, millions of hens have been destroyed because of AI: 3 million in Virginia, 8 million in Pennsylvania, and 18 million in Holland. Turkey growers who have traditionally kept birds on the range have moved them indoors because of the danger of AI contact with other birds. Lastly, the main farm is located on the watershed that supplies all of Boston with its water. Chickens on the ground would pollute this water.

The Natural Farmer Winter, 2003-04

We have found a certifier who is extremely strict in following the rules of the NOP. We too want to follow these new regulations very carefully. The particular rule applying to access to the outdoors is quite broad. However, we feel that giving birds a limited access will eliminate the major danger of AI to them and also preserve the water quality of Boston.

If you wish to learn more about NFC you may email them at info@nfccertification.com. And of course, if you want to answer all emails sent to countryhen@netplus.com. And, finally, you should find that as always, all our eggs have yolks that stand tall, whites that don’t run and a taste that defies description (by this ordinary writer)."

farm news from the country hen

The controversial Massachusetts egg producer is now including this note inside their egg cartons.

The eggs retail for $2.49 per carton of six.

TCH Looks For Alternatives

The Country Hen marketed their eggs with the National Organic Program. The only reason why we turned down their idea of porches was because the USDA National Organic Program’s policy statement on outside access for poultry, because they are fully enclosed structures and do not provide the necessary sunlight and fresh air required by the standards. Finally, we feel that the porches do not meet the National Organic Standards Board’s recommendation on Access to the Outdoors which specifies that organic animals must be able to choose to go outside. The porches are simply too small to accommodate more than a fraction of the birds in each flock.

SGM (single green monster) seeks special pest for good times and companionship. Willing to relocate. Enjoys fine dining, not much on romance. Call.

Want a bug connection worth loving? Call The Green Spot, Ltd.

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As important as the issue of outdoor access is to organic agriculture, more important issues were raised involving the National Organic Program itself during the certification process for The Country Hen. We didn’t simply deny The Country Hen’s certification. We notified them in October that they were not in compliance with the organic standards, and gave them until December to come into compliance. Instead of working to come into compliance, The Country Hen met with NOP staff in mid-October. After this meeting, they requested that we deny their certification so they could appeal our decision directly to the NOP. We denied certification at their request. The Country Hen then appealed our decision to the National Organic Program, and we were told by the NOP that we would get to state our case and give evidence as part of a formal appeal process. Instead, the very next day after we issued our formal denial of certification, the USDA sustained The Country Hen’s appeal and directed us to certify The Country Hen. No one from the National Organic Program ever reviewed our files, talked to our Certification Committee, or even asked us a single question concerning the denial. How can you have an appeals process without any investigation at all? How can an appeal be sustained, when the case file is never reviewed?

At this point we could have just done what we were told, but we felt we had made the right decision, that we had done what any accredited certifying agent is supposed to do, and we had been denied a fair hearing as part of the appeal. Furthermore we felt it would be unfair to all of our other certified operations that had followed the rules and did allow their chickens access to the outdoors. Therefore, we never issued a Certification Certificate to The Country Hen. We asked The Country Hen to remove our name from their egg cartons, they refused. We voiced our concerns to the NOP and they told us that if we didn’t certify The Country Hen we could lose our accreditation. The NOP does not have the ability to certify any operation, but allowed The Country Hen to market their eggs under our name even though no certification certificate had been issued. We approached Farmers Legal Action Group and filed an appeal in the court of the Administrative Law Judge of the USDA (case no. OFPA-03-0001). Even though we filed the suit in February of 2003, the administrative law judge didn’t rule until November. She ruled that we could not appeal because it was not allowed under section 205.681 of the National Organic Standards. She did not even acknowledge our argument that USDA was required to allow us to appeal under section 2121 of the Organic Foods Production Act, no matter what the organic standards say. Nor did she acknowledge our arguments that The Country Hen’s appeal itself had been improperly handled by the NOP. Our Board of Directors is now considering what additional legal steps we need to take to protect our rights and the rights of every certifying agent.

In September of 2003, The Country Hen stopped using our name on their cartons. Since August of 2003, they have been certified by another certifying agent. For our organization, this situation has become much more important than whether one poultry producer meets the requirements of the organic standards. For us it is about whether outdoor access for organic animals is going to be enforced. For us, it is about whether certifying agents can be ordered by the NOP to certify operations that are not in compliance with the standards. For us, it is about whether there is a fair, open, and honest appeals process for certifying agents and for certified producers. Most importantly, it is about whether the National Organic Program has any integrity at all.

What can the organic community at large do about this case?

1. Contact the National Organic Program and tell them you, as a farmer or consumer, insist there is integrity and meaning behind the word organic.
2. Contact your Congress member, Senator, or Ann Veneman, Secretary of Agriculture, and ask them to see to it that our case is resolved, so the National Organic Program can be implemented with full appeal rights as Congress directed.
3. Donate money directly to Farmer’s Legal Action Group to help cover the cost of our efforts to try and keep integrity and meaning behind the word organic. Because MICI and FLAG are both nonprofit organizations, we are relying on community support for this important work, rather than passing the costs on to our certification clients. If you would like to support our effort, please mail checks to FLAG, 46 E. 4th St., Suite 1301, St. Paul, MN 55101. Please include a note indicating that your check is for the MICI case.
New Jersey farmer and innovative marketer finds NOP rules too restrictive on seeds, composting, rotations, allowable materials.

by Jack Kittredge

The states of New York, Pennsylvania and New Jersey all meet at a point near Port Jervis, NY. It’s pretty high land, on the Appalachian Trail, in fact. Several miles southeast of there, just past the highest point in New Jersey, Richard Sisti has his farm. Rich grew up in Patterson, in a family of factory workers. But during his last years in high school he joined the future farmer program. “It was incredible,” he recalls. “You could do a little of everything. We went to a farm mornings and would work in the greenhouse, tend a pig, cut hay. Then I went to the State University of New York at Cobleskill and studied ornamental horticulture. After that I got into ‘rack jobbing’ tropical plants — you set up a rack in a store and service it every week. My company grew but it was hard to make any money.”

In about 1987, says Rich, he came across the land in Newfoundland, NJ and decided to give farming a try. “I didn’t know anything about vegetables,” he says. “But I thought: ‘This would make a pretty good organic farm.’”

He bought a 15-acre piece with a lot of flat land and a good site for a pond uphill of the flat land. Right away he put an irrigation pond in, spring fed and 10 feet deep. Although his soil is mostly clay, Rich finds that the snowload can get heavy enough, however, to collapse unheated houses without the center support poles.

One problem with his location is all the wildlife. “Apparently it came from Pennsylvania” he observes dryly, “walked into town, decided it didn’t land. “Apparently it came from Pennsylvania” he observes dryly, “walked into town, decided it didn’t land. “Recently a moose walked through his neighbor’s land, but the deer killed them. Sisti once met a bear and studied ornamental horticulture. After that I got into ‘rack jobbing’ tropical plants — you set up a rack in a store and service it every week. My company grew but it was hard to make any money.”

One of his favorite crops is a native variety of sunflower (the flower is only about 3 or 4 inches across) called a sunchoke. “You don’t have to plant them,” he laughs. “Most people say they’re invasive, but I think they’re gorgeous. You dig them up and eat the roots, like potatoes. One of the things that is neat about these guys is that if you are a diabetic and can’t eat potatoes, you can still eat these. They get huge. You can eat them raw in a salad, or they’re nice baked, — they won’t brown if you’re going to fry them. I like to mix them with garlic. Garlic and roasted sunchokes is very good! People like something you can’t buy elsewhere. “Native Americans probably ate more of them than you could believe,” he continues. “I think when they talk about the 3 sisters, what the Jesuits really saw, instead of corn, beans and squash, were sunchookes, groundnut — a little legume that the Jesuits described as big as a fist—and squash growing over the top. What you had with that mess was all winter food. You have roots in the ground, squash in your hut, and groundnuts.”

Sisti is also a strong advocate of hoop houses, of which he has three (only one is heated) and plans to build a fourth. Last fall, when it came time to plant garlic, there was already a lot of snow on the ground. So Rich planted it in the hoop house. It flourished there and in the spring he interplanted mustard and arugula with it. He discovered that flea beetles avoided them like the plague.

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Rich broadcast this arugula, and he’ll thin it over the next two weeks and use the thinnings for baby arugula in the shares. In another 7 weeks it will be harvested.

“I tell everybody: ‘You got to have a hoop house!’” he says. “There’s a real major reason besides the plants being happy. I don’t like to work in the rain, but it’s nice to work in the hoop house in the rain! It rained three inches on picking day so I picked most everything for this week’s delivery out of the hoop house.”

Rich said he put together some very creative financing because he couldn’t afford to put up his first hoop-house. “The frame cost $950,” he recalls, “and you have to frame the end walls. It’s not heated so you have to put supports up under the ridge or it will fall down. The plastic is about $200. We offered bonds to CSA members. They would give us $95 in December which we used for the greenhouse. Then come June they could take $100 off their share price or get their money back if they moved. I think we raised $1800 doing that. Then I took that to the Equity Trust and they lent me $5000 at 5% interest, with interest-only payments in the winter. I think we paid it off in 18 months. It’s 96 feet by 17 feet. It’s nice in here in March! And in March all the weeds pop up. You get rid of them then and they’re gone!”

Sisti used to market 100 percent through his CSA (except for selling some transplants to Whole Foods). But now he is about half and half CSA and other venues. “If you insist on selling vegetables,” he advises, “CSA is the only way to go. You load up your truck, you deliver, you’re done. You don’t care if it rains or if it snows, if the price is high or if the price is low. Plus, you get to grow anything in the world you can come up with. I think some people join only to get the weird stuff – the fuzzy gourds and the lemon cucumbers.

“But I’m the only labor here,” he continues. That’s why it’s a mess. Nobody wants to work. I don’t want to get involved in paying somebody who isn’t going to work. So I’d better take it easy just like I have my 25 CSA members, then try to make it up with other opportunities.”

The first several years Rich had a 100 person CSA located in Manhattan which Just Food had helped put together. But it was a lot of work and travel time. Then one day he had a talk in a restaurant in Hoboken and a lady in the audience volunteered her garage for distribution if he would do a CSA there. So he did.

Sisti starts delivering the first week of May. “That’s what hoop houses do for you,” he notes. “But then come the end of June I’m dying from all the work. Two years ago when one hoop house was in greens and turnips and beets we got 2000 pounds out of there by the end of June. That’s a lot of greens.”

He picks and loads his truck on Monday, delivers to Hoboken on Tuesday, and comes back up on Wednesday for the rest of the week. Rich charges his 25 members $385 for a share. He charts deliveries so new members can see what they’re going to get, uses it to judge what he’s giving each week. If it looks a little lighter than last year he tries to add something different. He shoots for at least 10 items a week, and has given out garlic, greens and herbs every week since May.

“What I love about the CSA,” he grins, “is I can raise anything! I have to tell people what to do with it, of course. Fuzzy gourds look like a hairy cucum- ber, so it tastes a little better when you cut it up with a little sweetness to it. It’s great stir fried with a few wilted greens. My customers have to cook. If they don’t do that this stuff is useless. I had members who don’t cook – they eat out three times a day. On Tuesday they get 5 pounds, next Tuesday they get five pounds again, pretty soon that refrigerator is filled. The other half of his market is transplants, garlic, and special events. Sisti sells tomato and pepper bedding plants every spring to Whole Foods Market. He also raises and packages about 50 varieties of garlic which he hopes to sell online. He has reserved the name www.garliconline.com and is hoping to create an interactive site where people with different varieties can all be listed — if somebody in Wisconsin wants whatever variety you have, they just contact you.

He has also taken part in and helped organize a number of special events where farmers can showcase and market their produce. Last spring he organized an heirloom tomato transplant sale and a taste of spring garlic. Rich had garlic greens and made garlic green pesto, which people liked and proceeded to buy bunches of greens. The event was over Memorial Day Saturday and Sunday when it rained and was cold. Nevertheless, sales ran about $2000. He also did tomato tastings in Hoboken and Ramsey. They set up a tent for tasting and another one for sale items. Volunteers serve samples, Sisti makes pesto. Sometimes he makes a salsa, and has a recipe card available and all the ingredients are for sale.

“Rotation is the next thing,” he continues. “I always had a problem with rotation. Rotation doesn’t fit all varietals of garlic and as a result it didn’t matter. I have flea beetles in those brassicas over there, and there isn’t much stopping them from coming over here.”

Composting all his organic matter is another principle that Rich doesn’t agree with. He thinks he can do just as well tillng straw or hay directly into the soil. He figures the worms have something to eat that way, and tells of the time he got mushroom compost which was dreadful — hot and not finished. He says it was nice a year later, but that happens a lot with compost you buy.

Sisti was also upset about having to throw out left over materials he had been allowed to use before. “We were allowed to use Ferrett Blue and Gold SS before,” he cites “however, once the NOP came into effect we were supposed to dump left over bags because they weren’t OMRI listed. But then I read that a big operation got an exemption to use up their supply because their labels were all made already! They had the money. A lot of guys like me with ten bags aren’t going to go for an exemption, but if we use it up we get busted. Hydrogen peroxide is another issue. They have a product for fungus on tomatoes with that as the active ingredient. But it’s not OMRI listed so now you can’t use it. But if you
have a $250 bottle of it with just a little bit used, what do you do?"

One of the last things that convinced Rich to drop certification was the issue of rock wool. He found it an excellent material for holding moisture for his certification was the issue of rock wool. He finds it watered plants and then surrounds the pots in a tray with rock wool. He says, "It used to be you could sit down with your commitment and suggest something," he recalls. "Working with NOFA was kind of loose — you were allowed to do creative things. Now it’s: ‘This is the law!’ You can’t even think anymore. There was that SARE grant study by Louise Logan on using plastic mulching three years and covering it with rock wool. I thought: ‘That’s brilliant! If you want to deal with the problem of getting the plastic and weed mix out after three years, you’re the farmer. But leaving the plastic in a year or so is now forbidden for any organic use."

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“My 65 member CSA in New York was radical — they were into the Save Our Standards movement. But they didn’t mind. They would come out, look the place over, ask questions the same as an inspector would do. "I get questions at the festivals about being organic," he continues. "I say: ‘I’m not. I was.’ I’ll bring a basket of the organic stuff, and it’ll go, but the conventional certified some not. Nobody seems to care. But if I was wholesaling, even selling to Whole Foods, forget it. They’ll take me because I’m local, and put me with the non-organic food. The company is into that. They want the local stuff. I think they pay okay. Some people get upset because they double their money, but that’s the way it is. If they get $5 you get $2.50."

“I liked certification. I just don’t think it would work for me. It seems like a lot of politics. NOFA is picking this chicken outdoor access thing to the tune of $40,000. It seems like there’s so much better stuff to do. Before this you just would have said no. The big money wins.”

Animal Drugs and Organic Rules
Who makes the Call?

by Emily Brown Rosen, with thanks to Dr. Neal Bataller, Consumer Safety Officer, Division of Compliance, FDA-CVM, and Dr. George Graber, Director, Division of Animal Foods FDA-CVM

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When it comes to health care, organic livestock farmers rely on management practices such as species selection, choice of appropriate feed rations, appropriate housing, good pasture management, and selective culling of the herd. In addition to these preventive methods, the NOP regulations permit the use of vaccines and biologics as well as natural (nonsynthetic) and synthetic substances on the National List. At present, the National List includes only a few synthetics for livestock health, such as aspirin, chlorhexidine, oxytetracycline, and topical materials such as iodine, lidocaine and procaine.

The 19 livestock health care substances that the NOSB has recommended since November 2000 have not yet been added to the National List. [Editor’s note: see the attached table of NOSB recommendations for the proposed use restrictions]. According to Dave Carter, chairperson of the NOSB, the large number of recommendations this summer from FDA which question NOSB recommendations for most of these substances. Ten of them, all ingested, are not approved for any medical use in animals. In this group of 10 are activated charcoal, bismuth subsalicylate (better known as the active ingredient in Pepto-Bismol®), butorphanol, calcium borogluonate, calcium propionate, kaolin pectate, magnesium hydroxide, magnesium oxide, mineral oil, and potassium sorbate used as a preservative in aloe. Aloe is also not approved for use as an animal drug.

Livestock farmers and veterinarians commonly use all these substances, but they are not on the approved list for animal health care. Establishing their ‘organic’ status under the overlapping regulatory jurisdictions of the NOP and FDA is proving problematic. To help in the understanding of the complex regulatory status of these livestock substances, OMRI offers this general overview of the regulatory issues.

FDA Jurisdiction

According to FDA officials, any substance that animals receive as the rock wool and it must be approved either as a feed or as an animal drug. A ‘food’ is any substance given for. FDA exercises some discretion over enforcement actions taken against non-approved products. All unapproved drug manufacturers are required to register on an FDA drug listing operated by the Center for Veterinary Medicine. When brand name products are listed on this database, it is an indication that FDA is aware of their existence and has not taken action to remove them from the market. The list is not publicly posted and can only be accessed by a Freedom of Information Act request. According to FDA, some candidates for this list are drugs that treat “self limiting” diseases (i.e., those that resolve without treatment), drugs that do not leave any drug residues or cause any harm or suffering, and non-antimicrobial drugs.

FDA officials noted that neat drugs are scrutinized more closely than other unapproved drugs due to the need for regulation of unapproved substances for sanitation. Thus for FDA, iodine is an “unapproved animal drug” although it is on the National List. An unapproved drug must be tested at certain concentrations and will review iodine products applied to the drug listing Program according to FDA guidance policies. FDA compliance guidance documents deal with many issues related to unapproved drugs, including labeling and enforcement policies. For a list of these guidance documents see the FDA web site. http://www.fda.gov/ora/compliance_ref/cpg/cpgvet/default.htm

Drugs that are restricted to use on certain animals or at certain rates may be used “off-label” when under veterinary supervision. Several NOSB-recommended drugs that are approved only for non-food use, can be classified as “Generally Recognized As Safe” (GRAS) products. FDA has recently ruled that a New Animal Drug Application (NADA) for a feed additive must be filed for new animal drugs. The veterinary drug approval process consists of a series of consultative procedures and reviews. As mandated by the Federal Food, Drug and Cosmetic Act, a new animal drug may not be sold in interstate commerce unless it is the subject of a “NADA.” An “approved NADA” means the substance is safe and effective for its intended use and that the methods, facilities and controls used for the manufacturing, processing and packaging of the drug are adequate to preserve its identity, strength, purity and quality. FDA has regulated differently than animal drugs in that there is a provision for review of the Over The Counter (OTC) drugs through the Center for Drug Evaluation (CDER) or the Center for Food Safety and Nutrition (CFSAN) Office of Color and Cosmetics. A list of these substances that receive approval for OTC use. According to FDA officials, it was originally intended that some livestock drugs would also be covered by the OTC program. Most OTC drug products for human use have been marketed for many years, prior to the laws that require proof of safety and effectiveness before marketing. The main objective of the OTC program is to provide drug monographs from FDA and other agency scientists, with contributions from a federal advisory committee. The OTC drug products, if marketed without FDA pre-approval, while those that do not, must undergo separate review and approval through the new drug approval (NDA) process. The drug monograph is never developed for livestock drugs, and consequently all livestock drugs must be approved through the NADA process.

Many “unapproved” animal drugs are on the market, especially in the class of topically treated products. FDA exercises some discretion over enforcement actions taken against non-approved products. All unapproved drug manufacturers are required to register on an FDA drug listing operated by the Center for Veterinary Medicine. When brand name products are listed on this database, it is an indication that FDA is aware of their existence and has not taken action to remove them from the market. The list is not publicly posted and can only be accessed by a Freedom of Information Act request. FDA’s main concern is with products marketed without efficacy or safety assessments. For these products, enforcement actions are taken against the suppliers, not the farmers. The medical use of these drugs can be complex as illustrated with the examples of teat dips and udder washes. According to the FDA guidance policy, teat dips have an inherent claim to protect against mastitis and thus are considered drugs. On the other hand, udder washes for which there is no claim and no antimicrobial ingredient are considered cleansing agents and are not classified as drugs. However, udder washes may be subject to food additive regulations unless they are considered Generally Recognized As Safe as a food additive.

FDA officials stress that their concern is with protecting the public against fraud and ineffective products. FDA’s advisory committee, the NOSB, meets November 22 in its presentation at the NOP meetings in Washington, D.C. Until the NOP and FDA handling of organic livestock health care substances is resolved, however, organic farmers should be careful to avoid non NOSB-listed synthetic materials for animal healthcare use and consult with certification agencies for current policies.
In response to the question, “What do we think of the NOP after one year?” I’m going to be speaking for both Demeter Association, Inc. and Stellar Certification Services, Inc. because the two companies, though legally separate, function from the same office space with the same executive director and with some over-lap in the board of directors. To set the stage, the NOP is an organization with a long history - formed to certify Biodynamic® agriculture and Biodynamic products to standards which have been in existence more or less since 1926. Aurora Certified Organic was added in 2000 under Demeter auspices to emphasize whole farm organic stewardship. Demeter is not a government program. Demeter/Aurora remain private programs with no direct ties to USDA/NOP. Stellar is a new company established in 2002 to give government certification to our Demeter/Aurora operators and to others who make the request.

From my vantage point as director of both companies, the NOP has been a basic disappointment from the start. Aside from plugging a gigantic spider on everyone’s back [more on that later], the implementation of the NOP has resulted in some long-time Demeter farmers dropping certification. Reasons for this are three-fold: 1) they don’t want the government as the arbiter of organic, 2) the additional paperwork is too much burden, 3) the extra cost is the final straw.

Some very long-term Demeter certified operations have just said “No” to government control of certification and dropped out entirely. Some were CSAs which chose to be certified primarily to be a part of something especially important to them like Biodynamic® agriculture. Government organic was not seen as especially important. I can agree that the government hand in certification has not been very friendly. Nevertheless, it is sad to see attrition in the ranks of long time Demeter operators.

Record keeping is a worthwhile activity, the problem is that farmers have limited time for it. One gardener who dropped Demeter certification said he would rather spend his time in his garden doing a better job there than keeping records. Many jobs are in-your-face urgent on a farm. Records do not help farmers in many states have been able to receive a benefit to the certified operator with such a gag order. I sympathize with this position while at the same time trying to persuade farmers that good records do not help them become better farmers. Rather we are government puppets rather than farmers requiring training in such a way that certifiers are always in danger of being threatened that our accreditation will be in serious jeopardy if we don’t jerk on command. I do not find that the USDA auditor’s flagging of minor non-compliances or so-called ‘continuous improvement points’ has helped improve our program performance even one tiny bit. On the contrary, responding to USDA’s usually inane non-compliance or continuous improvement issues diverts a lot of energy from more worthwhile certification work.

Semantic stretches have been another crazy part of the game. Language is important, and yet here also we are manipulated: a) We don’t have genetically modified organisms any longer; we have ‘excluded methods’. b) Certificates can no longer have an ‘expiration’ or a ‘renewal’ date in spite of the great need we all have for this, but we can apparently squeeze around this restriction by calling it a ‘reissue date’. c) It was drummed into us early on that inspectors cannot say anything that would help an operation overcome a barrier to certification. We struggled to figure out how to have an educational benefit to the certified operator with such a gag order. Now a state certification program has pointed out that a barrier does not exist until identified by the certifier, leaving inspectors free in many situations to have a conversation about anything that flags their attention. Have we been laboring under a misconception? Is there any solid ground we can stand on? The USDA audit has brought shocks and surprises. The auditor asked for our personnel evaluation records. Very well, I sent them with the names removed. Not good enough. He wanted names. In my opinion, a contractor’s work, evaluation records should not have to be scrutinized by the NOP. This is an invasion of privacy. Another shock was that the auditor wanted to know what the board had discussed re: our Stellar/NOP program. He wanted minutes of the board meeting! Is this legitimate? I don’t think so. Stellar is a private corporation. Our internal discussions are not the business of the NOP. These types of events push USDA intrusion over the edge in my opinion.

And then again, from the farmer perspective, I recently had to answer a letter from a farmer who has retained certification but complained bitterly that inspection was now like having a visit from the Gestapo. Comments like this unnerve me, partly because that’s what USDA is all about – they are relentlessly because the farm had minimal records. I maintain that this appearance of heavy handedness, jackboots, etc. comes from the top down. It wouldn’t hurt anyone or anyone on a top NOP echelon could be seen as acting in a more friendly way toward certifiers. Trickle down friendliness would be a big help in making the NOP palatable to the small farmers who are our core constituents. As it is, when we tell them we have to enforce some bit of paperwork, otherwise USDA will come down on us, there is an implied threat that if they don’t do what we ask, Stellar might lose accreditation. This is no way to treat farmers (or certifiers), putting them and us always in fear of losing our livelihood.

What do we think of the NOP after one year? We think it takes the joy out of certification work. We think being controlled by government bureaucrats is not where we need to be. We enjoy the freedom and the initiative possible with a private certification system. NOP offers neither and squelches both. We are now meant to be cookie cutter certifiers. I feel that the government involvement is not directed relentlessly toward a loss of individual perspective, values, and ethics. The EU system allows for additional standards to grow out of the base standards. The NOP does not allow this and it is a major problem with the NOP. OPFA as passed by Congress in 1990 did not preempt additional standards; the NOP rule as written by USDA does.

It’s the law – no certifier can have different standards than any other certifier. Already, clients holding up to us the fact that some other certifier allows such-and-such to be used that we don’t, owing to a difference in interpretation seen through the muddy water we operate in, and challenging us to accept the lower interpretation. Processors from whom we require a certificate attesting to the NOP compliance of imported ingredients tell us nothing of the NOP itself. We are left to figure it out for ourselves.

Program, we are no longer helping people become better farmers. Rather we are government puppets controlled by the USDA with varying degrees of authoritarianism. This brings us nothing of a soul building nature, nothing that we can be passionate about. I am not optimistic that we can ever develop passion for a system of certification that is controlled by the USDA with varying degrees of confusion and rigidity. What a loss to a fine movement. Where is the pride in a job well done?

A lifting of the NOP imposed standards ceiling would be a good place to begin to rectify the situation. If we could accomplish this, it would restore some of the initiative, freedom, joy and passion we are so sadly lacking at this time, though the spider would still be there on our backs.
Assault on Organic Standards

The Consumer Union published this “Viewpoint” regarding the disappointing short history of the NOP to date.

The Consumer Union Perspective, August 2003

It took 12 years of hearings, hundreds of thousands of comments from the public, and the drafting of 600 pages of proposed standards to create the “USDA Organic” label.

Issued last October, it was a major achievement. Even its toughest critics agree that any food bearing the organic label must be produced far more naturally, with far less impact on the environment, than conventional food. Among the requirements: no synthetic fertilizers, few chemical pesticides, no antibiotics or hormones, no irradiation or genetic engineering, no animal byproducts, no animal feed, and access to the outdoors for all livestock.

No sooner did those tough standards go into effect, however, than various enterprises began to look for ways to cash in on the USDA Organic label without having to adhere to all the demanding rules. In October, The Country Hen, a Massachusetts egg producer, applied to its local organic certifier for permission to use the organic label. But to meet the rule that its chickens would be able to go outside, the producer indicated that it planned to put a few porcine on its henhouses, which held thousands of layers. Did this promise fulfill the requirement for access to the outdoors? The local certifier said no. But on appeal, the USDA overruled the certifier and said The Country Hen could use the USDA’s and the certifier’s organic labels.

The certifier has since filed suit against the USDA and Consumers Union has urged the USDA to change its ruling. In the meantime, Country Hen eggs are on the market with the organic labels.

In Georgia, some chicken producers wanted to use the organic label on their broilers. But they discovered that organic feed, which is what an organic chicken must eat, was relatively expensive. So the chicken producers convinced Rep. Nathan Deal (R-Ga.) to push through Congress a rider to the 2003 Omnibus Appropriations bill saying that if organic feed cost more than twice as much as regular feed, organic livestock could eat the regular kind.

As that drastic cheapening of the organic label became known, Consumers Union and others objected. Sen. Patrick Leahy (D-Vt.) amassed enough support to repeal the feed exemption. But there was a cost. Sen. Ted Stevens (D-Alaska) insisted that the legislation instruct the USDA to authorize use of the organic label on seafood caught in the wild. That includes not just salmon from the relatively unpolluted waters off the Alaska coast but also swordfish and shark, which the Food and Drug Administration says contain so much mercury that children and pregnant women should not eat them.

Last October, with no hearings or public discussion, the USDA extended its rules on organic labeling to cosmetics. There are now shampoos and body lotions labeled “70 percent organic” based on the fact that their main ingredient is “an organic hydro–sol.” What’s that? It is water in which something organic, such as an organic lavender leaf, has been soaked.

Consumers Union believes that Congress must stop entertaining requests from special interests to cash in on the USDA Organic label and that the USDA must become a strict steward of how the label is used. Consumers want and need an organic label they can trust.

What you can do

To learn more or to express your views about these issues to the appropriate government officials, visit the Consumers Union Guide to Environmental Labels at www.eco-labels.org.

The Farmer’s Pledge: Rooted in Integrity

This alternative self-certification system lets the organic movement retain control of its standards, and adds farm size, local sales, labor practices and other principles about which the NOP is silent.

by Mark Dunau

In the fall of 2000, the Governing Council of NOFA-NY met to decide whether or not NOFA-NY’s Certification Program would apply to become a USDA certifier for the National Organic Program. Many members of the Governing Council were appalled at the Final Rule of the National Organic Program, and felt that NOFA-NY’s Certification Program should not give the NOP credibility by becoming a USDA certifier. At the same time, all the Governing Council members recognized the importance of organic certification to many farmers, particularly those that sold their products as components of the wholesale market. The compromise that the Governing Council reached was that we would unanimously support NOFA-NY’s Certification Program becoming a USDA certifier on the condition that an “Alternatives Committee” develop a program more in keeping with the principles that have guided NOFA-NY for the past quarter century.

In the fall of 2002, the “Alternatives Committee” presented the Farmer’s Pledge to the Governing Council. Governing Council unanimously endorsed it, and in the spring of 2003 the Governing Council offered it to NOFA-NY’s membership.

The Farmer’s Pledge declares in one page what the Governing Council of NOFA-NY believes are the most important principles and practices of organic farming. These include not only stewardship of the land, but commitment to food safety, local agriculture, small farms, fair labor practices, and regional ecology. If a member of NOFA-NY believes his or her farm is in compliance with the Farmer’s Pledge, the Pledge is signed before a notary, and mailed to NOFA-NY with $50. That’s all it takes to become Farmer Pledged. No one from NOFA-NY will come to the farm to verify that it is in compliance with the Pledge, although the Pledge itself does state that customers may visit the farm by appointment.

The heart of the Farmer’s Pledge is integrity. Any pledged farmer can cheat, but because the Pledge assumes that the farmer is honest, the bureaucracy of third party verification is avoided. The Pledge does not focus on the details of organic farming practices, but embraces the big picture by stating in the opening line that knowing the farmer is the consumer’s best protection. The Pledge seeks to restitute the common ground between certified and uncertified organic farms that is in part responsible for the boom in direct marketing sales over the last four decades; in 1964 there were only six farmers’ markets in New York State, today there are nearly 200. As the NOP defines and regulates “organic” as a production standard and not a food safety standard, lack of third party verification in the Farmer’s Pledge can not be said to risk the health of the public.

Perhaps the most important aspect of the Farmer’s Pledge is that it succeeds in communicating the core practices of organic farming without the USDA. The Governing Council of NOFA-NY’s largest objection to the National Organic Program is that it makes illegal for farms with sales of over $5,000 to use the word organic in commercial speech unless they are certified USDA Organic, despite the fact that when the NOP was implemented, about half the organic farms in the United States were not certified. This usurpation of the word “organic” by the USDA is unprecedented in U.S. history, and the structure of the NOP and the USDA will make it nearly impossible for small farms to influence its future meaning.

The Farmer’s Pledge, however, will be reviewed annually, and suggestions for improving it are encouraged. To date about 70 farms in New York have signed the 2003 Farmer’s Pledge. These include certified farms that wish to express their commitment to principles that go beyond the NOP, farms that are once certified but have such strong objections to the NOP that they have chosen not to certify, and farms that have never been certified organic because their customer base made it an unnecessary expense.

NOFA-NY’s Food Guide will include farms that are certified through NOFA-NY Certification and farms that have signed the Farmer’s Pledge. CT NOFA is also offering the Farmer’s Pledge to its membership, and is including farms that have signed the Farmer’s Pledge in its Food Guide. Hopefully, in 2004 the Farmer’s Pledge will have a logo.

Organic Agriculture is as old as civilization. The demand for organic food in the United States did not grow because of the USDA, but despite it. There are alternatives to USDA Organic; the Farmer’s Pledge is simply one of them.

The 2003 Farmer’s Pledge can be read and downloaded at www.nofany.org. It can also be read in the Fall, 2003 issue of the Natural Farmer.
Why I Stay Certified

This outspoken Connecticut small farmer explains why he has opted to hold his nose and stay with the NOP.

by Wayne Hanson

I don’t think I’ve always disliked organic certification, but I barely can remember when I liked it. It was probably fifteen seasons ago when I first got certified by Connecticut NOFA. I was pleased to be part of the structure of the organic community and to have my diligence recognized and documented. Once I joined the certification committee and helped with the process, I began to see some shortcomings. I learned to accept it as a necessary evil. I believe that certification should provide a level playing field for producers and an assurance of a standard to the consumers. Even when that is accomplished, it still tends to stifle experimentation and adds extra load to the already burdened farmer.

Since the federal standards became the law in October, 2002, I have argued with others and with myself over why I should get certified. As a fellow who slashed his wrists at the induction center in 1966 to stay out of the military, I don’t think I have to prove that I’m not a fan of a government gone awry. It’s just that I’d hate to lose the use of the word “organic”, hate to give it over to the big boys in California and just abandon the battlefield. So, I’ve gotten certified.

In the middle of Kansas in 1972, helping friends start a small farm there, I had a conversation with an intelligent farmer and rancher, a neighbor of ours, Paul Jones. At some point, I said we wanted to grow things organically. His brow furrowed and he said “Why?” That’s how far off the screen organic was in Kansas then. There was no anger, none of the disdain or defensiveness I’ve encountered around here, just puzzlement. In 1989, searching for a name for my “farm” here, a friend suggested using the word “organic” in the title for clarity. So, I’ve gotten certified.

The greatest problems of the 2003 season came not from the NOP but from the weather. The NOP was responsible for the loss, to me, of two useful tools, “Oxidate” and “Novador” whose inert disqualifying them under the new standard. I found it tough to find substitutes at the last minute. I also had to account for the fact that I had a large, expensive jug of each in the cellar I could no longer use. The weeds, the diseases and the pests were beyond control this year, almost across the board, so I find it hard to blame the NOP.

I am angry at the Congressional abuses, some remedied, like the all-organic feed rule call-back and some not, like the Alaska Senator’s getting all wild-caught fish ruled organic. I don’t see that any of the old confusion about what organic is has been cleared up either, at least not at my level of commerce. I’ve overheard customers call one of my fellow market vendors “organic” even though I know that vendor only tells people that they don’t spray. Of course, you really do spray: fish emulsion, Bt, and other acceptable products. It’s a crazy world.

Wayne and his wife Marilyn sell his produce and her crafts at many farmers’ markets.

Most disturbing to me is the acrimony among a formerly cohesive alternative farming community with jealousy and derision going back and forth between the certified and the uncertified. We must begin to work toward common ground and away form fragmentation.

Now, if a few years pass and Congressional hijinks get completely out of hand and we simply can’t stomach it anymore, then I say we go back to calling ourselves “local organic”, make up our own rules as we have before and damn the torpedoes!

My overall view of the NOP a year after is that it has changed little of substance for my operation and has neither benefitted nor hurt it. Sticking with a local certifier who best can understand your situation exemplify all that, certified or not. The record-keeping remains a challenge and takes time, but you can work with it even on a small-scale place like mine (I now grow on just under two acres.) One just needs to develop a system and to be fairly conscientious in maintaining it. Mine is still evolving.

I do miss it that organic used to encompass more than production methods and included social justice and larger environmental issues. Well, many of us thought so, at least. I can still espouse, promote and exemplify all that, certified or not. The record-keeping remains a challenge and takes time, but you can work with it even on a small-scale place like mine (I now grow on just under two acres.) One just needs to develop a system and to be fairly conscientious in maintaining it. Mine is still evolving.

The Natural FarmerWinter, 2003-04

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My overall view of the NOP a year after is that it has changed little of substance for my operation and has neither benefitted nor hurt it. Sticking with a local certifier who best can understand your situation is a good idea. Promoting local organic food remains the most important element for improving the circumstances of local organic producers and keeping us going. Organic certification remains a necessary evil that I don’t care for but, for the moment, accept.
The National Organic Program (NOP) Implementation Update – Emerging Trends and Challenges

A national consumer watchdog group, familiar in detail with the National Organic Program, critiques its implementation. The process for developing the national standards was to be open to public participation through open communication with USDA through the work of the National Organic Standards Board (NOSB) to date, NOP’s communication with NOSB has been sporadic at best, with some of the most important standards interpretations still left undecided, or in contradiction with the NOSB’s recommendations (see example below).

A Program Manual and/or regularly and formally-issued guidance documents would help a consistent interpretation of organic – none of these exist.

Case Study: An example of Accreditation and Certification gone awry?

A central issue has been the effectiveness and objectivity of certifier accreditation. With numerous certifiers already active in the organic industry, and more entering the field, USDA has been challenged to build a program that would ensure the consistent application of the standards through its Accredited Certifiers (ACAs). As the USDA Accreditor, does USDA measure up to the hallmark of good accreditation: transparency, competency, and independence? What happens if the accreditation process is not implemented properly?

Background of the Case

Massachusetts egg producer, The Country Hen, applied to the NOFA/Mass Organic Certification Program operated by Massachusetts Independent Certification, Inc. (MICI) for organic certification in July 2002. In October 2002, MICI denied certification, stating that: “The Secretary shall establish an expedited administrative appeals procedure under which persons may appeal an action of the Secretary, the applicable governing State official, or a certifying agent under this title that – (1) adversely affects such person; or (2) is inconsistent with the organic certification program established under this title.”

What is at stake here is significant: How are certifiers to protect the integrity of organic, the NOP, and its own reputation, if the certifier’s decisions may be overturned instantly, arbitrarily, and without recourse to an appeal?

The recent case against the Department highlights essential components of a functioning NOP. A USDA actions in implementing the national organic force of law out four essential components of a National Organic Foods Production Act (OFPA, 1990) laid out four essential components of a National Organic Program (NOP):

1. A partnership between government, farmers, consumers, and industry
2. Implementation of a consistent national definition of organic
3. Enforcement activities that would carry the force of law
4. Facilitation of trade

USDA actions in implementing the national organic standards already threaten to undermine these four essential components of a functioning NOP. A recent case against the Department highlights structural issues in the implementation of the law in two of these components.

Issue Outline

1. A unique federal regulatory program partnering with the existing organic community (farmers, industry and consumers)
2. A hallmark of OFPA was its recognition of the existing organic industry: OFPA was to harmonize these standards, not to superecede the knowledge and efficiency of the existing infrastructure.
3. The intent was to not “reinvent the wheel” (Senate Report 101-137, July 1990) or cause undue economic hardship to the existing farmers, producers, and certifiers. This included an acknowledgement of the expertise inherent in organic agriculture, and existing oversight programs.
4. The NOSB was put in place to assure this partnership through:
   - Citizen participation in the standard setting process
   - Development of the National List
   - Development of livestock standards and other standards already in existence
   - This partnership included the Peer Review Panel, to be comprised of individuals with expertise in organic farming and handling, to oversee accreditation decisions.

NOP’s recent contract with ANSI for a one-time audit is a step at a mid-course review, but is not sufficient to meet the requirement for ongoing peer review as mandated by the law.

By not recognizing other 3rd Party organic Accreditors, the Department has caused undue hardship for certifiers who operate outside of the U.S. They are required to accredit twice – once with USDA, and once with an international accrediting agency.

While a legitimate NOSB has been convened, its recommendations to USDA, guided by careful and transparent discussions have not been acknowledged.

2. Implementation of a consistent national definition of organic
   - A consistent national definition of organic was to be supported by the development of national standards governing the marketing of organic products and the accreditation of certification programs to assure consumers that organic products meet these standards.
   - A hallmark of OFPA was its recognition of the existing organic industry: OFPA was to harmonize these standards, not to superecede the knowledge and efficiency of the existing infrastructure.

The process for developing the national standards was to be open to public participation through open communication with USDA through the work of the National Organic Standards Board (NOSB)

The NOSB has been provided the purview of clarifying the livestock standards. In fact, as the complexity of organic standards has increased over the past decade, the NOSB has recommended clarifications of many aspects of the organic standards. NOP has done this through public input and independent research. Yet since the promulgation of the Final Rule, none of these recommendations have been adopted by USDA in regulatory language, and there has been no feedback as to the status of these recommendations. In the case of outdoor access for poultry, the NOP has actually promulgated standards clarifications that were in contradiction to the NOSB’s recommendation and comments from the public.

While the NOSB has worked hard to evaluate issues in a forum accessible to the public, the response from the Department has left the entire organic community with no understanding of where these recommendations fit within the regulatory structure of the Nation.

DRAFT RECOMMENDATIONS TO USDA

1. Publish a timeline, process, and protocols for USDA in addressing NOSB recommendations made since the final rule.
2. Establish a permanent Peer Review Panel. The ANSI audit addresses the international norms for an Internal Audit, but it does not meet the requirements for establishing a Peer Review Panel.
3. Bring the NOP into full compliance with ISO 61 and ISO 65 guidelines
4. Develop a Program Manual for the NOP’s accreditation program (in compliance with ISO 61) which is approved by the NOSB and make it available to the public.
5. Recognize third party accreditation programs (as recommended by the NOSB) to reduce the expensive and time-consuming burden to certifiers of double accreditation.
6. Recognize that all entities involved in organic – producers, handlers, certifiers, and consumers – must have full appeals rights. The process for these appeals procedures must be promulgated through notice and comment rule-making.

Discussion: Weakening the Standards by “Interpretation”

The MICI case also brings to light the issue of standards interpretation. NOP has often noted that it is up to certifiers to interpret the standards. The law has given the NOSB the purview of clarifying the livestock standards. In fact, as the complexity of organic standards has increased over the past decade, the NOSB has recommended clarifications of many aspects of the organic standards. NOP has done this through public input and independent research. Yet since the promulgation of the Final Rule, none of these recommendations have been adopted by USDA in regulatory language, and there has been no feedback as to the status of these recommendations. In the case of outdoor access for poultry, the NOP has actually promulgated standards clarifications that were in contradiction to the NOSB’s recommendation and comments from the public.

Discussion: Confusing Certification and Accreditation

OFPA provides legislative authority for USDA to accredit certifying agents, not to do the certifying. In fact, the law’s intent was to limit the federal government’s involvement in the existing industry through a partnership of government and private organizations in standard setting and certification (see Senate Report). Yet, USDA has consistently blurred the line between certification and accreditation. In the case above, the Department overrode a decision that was made by an independent certifier through a documented process – without transparent review. This appears as though the Department is making certification decisions. And, if the Department is making certification decisions, who is overseeing the Department’s certification process (that is, who is accrediting the Department)?

USDA has yet to show specific accreditation procedures that are consistent with commonly-accepted requirements for accreditation; specifically those outlined by the International Standards Organization (ISO 61). This includes: 1) a distinct separation of the responsibilities of the Accreditor, does USDA measure up to the hallmarks of good accreditation: transparency, competency, and independence? What happens if the accreditation process is not implemented properly?

The MICI case also brings to light the issue of standards interpretation. NOP has often noted that it is up to certifiers to interpret the standards. The law has given the NOSB the purview of clarifying the livestock standards. In fact, as the complexity of organic standards has increased over the past decade, the NOSB has recommended clarifications of many aspects of the organic standards. NOP has done this through public input and independent research. Yet since the promulgation of the Final Rule, none of these recommendations have been adopted by USDA in regulatory language, and there has been no feedback as to the status of these recommendations. In the case of outdoor access for poultry, the NOP has actually promulgated standards clarifications that were in contradiction to the NOSB’s recommendation and comments from the public.
NOP Certification in Rhode Island (yes, there are farms in Rhode Island)

In the Ocean State a NOFA member runs the state certification program. Here are his thoughts about life under the NOP

by Dan Lawton
Rhode Island Department of Environmental Management

My first name means “judge”, and my last name means “farmer of the hillside”, so perhaps it was meant to be that I am a farm inspector. When I was about 12, my mother was diagnosed with cancer. Seeing her suffer through years of treatment (she eventually was cured) gave me an inclination toward natural living. Around that time I also began taking an interest in the family garden. My grandmother subscribed to Organic Gardening magazine, and had saved every issue since about 1968. By the time I finished high school, I had read all her magazines, plus An Agricultural Testament by Sir Albert Howard, and most of the gardening books in the local library. I had also converted the family garden into organic raised beds. I then went on to study Plant Science at the University of Rhode Island and took a summer job inspecting nurseries for insects with the Rhode Island Department of Environmental Management. When I graduated in 1988, I continued as an intern with the DEM, inspecting nurseries and trapping mosquitoes. I was eventually hired full-time and now supervise the nursery program and administer the organic program.

In 1990, NOFA/RI asked the State to take over the certification program they started the previous year. Since I was the only one there that knew anything about organic gardening, I was assigned to the project. At first the NOFA people seemed suspicious as to whether they could trust this quiet government kid with enforcing the program they had developed and making decisions that would affect their livelihood, but they quickly saw my integrity and adopted me into the Rhode Island organic family. That isn’t to say it was a completely smooth transition. Their program was based on a flexible interpretation of the standards. When we took over, everything had to be clearly defined and consistently applied. Some chose not to continue their certification at that time, but we generally enjoyed a good relationship with the farmers.

Our certification program is essentially a one-man show. I do all the administration, inspection, review and compliance. My supervisor reviews the applications and makes the decision to certify because the NOP requires that to be done by a person other than the inspector. As a State program, we had a certification committee of two farmers and three Department employees that reviewed applications and updated the standards every year. Since none of us at the DEM were organic farmers, we benefited greatly from the farmers’ expertise. A few farmers voiced concerns about other farmers seeing the information on their applications but most of them were supportive of the farmer’s involvement in certification. Now, under the NOP, there is so much documentation required that it takes too long for five people to review everything, so we are changing our procedures to have just two people involved in the process. We will still have a committee but it will now be an advisory committee rather than a certification committee.

In 1990 we certified 19 organic farms, encompassing 28 acres. Seven of those are still certified. When the NOP became effective in 2001, we had 37 certified farms, with 217 acres. The number of applicants then dropped to 26. About half of the ones that dropped out did so because of the new federal regulations, and the rest were for other reasons. We currently only have ten farms certified. On top of running the organic program and inspecting 2,000 acres of nursery stock every year, I also had to assist in setting up a new program to monitor for bioterrorism threats as a result of 9/11. So I am behind on processing applications and doing inspections. If there are no unexpected setbacks this year, I plan to get all the applications reviewed this winter and be caught up on inspections by next summer. I have noticed an increase in people calling for information about certification since the NOP came into effect, but so far I only have two new applications.

The organic farms in Rhode Island mainly produce vegetables, small fruits, herbs, and salad greens, and market through farmstands, farmer’s markets, CSA’s, and restaurants. There are a few that sell to local stores and Whole Foods. Rhode Island actually has the highest per acre farm income of any State because most of what is grown here is sold retail. Marketing is a challenge for the smaller farms, but the established ones seem to be able to sell everything they can grow.

Being that our State is so small, I have always tried to maintain a close relationship with the farmers. I attend most of the RI-NOFA meetings and events, and try to keep the farmers informed about the requirements of our program. The NOP rules strictly forbid inspectors from giving advice to farmers, which ended a longstanding practice throughout the Northeast of inspectors being educators. There have been times when we had to deny or revoke certification of a crop or field because of a prohibited material that was used. In most cases it was a matter of misunderstanding of the standards rather than intentional noncompliance.

Implementation of the NOP has been a rocky road for everyone involved. The requirements for accreditation were intentionally made to be flexible to allow certifiers to adapt to their situation. Unfortunately, this resulted in some vague rules and loopholes. There are still questions about how we should be doing things, and inconsistencies between certifiers. The NOP staff has been helpful to a point, but they are as overburdened as we are, and are not able to give everyone the guidance they need. The rollout of the NOP implementation, several meetings of the NOP staff and farmers or certifiers became heated and antagonistic, but we seem to have established a level of understanding with each other and are working together much better now. My best resource for assistance has been networks of other certifiers, such as the National Association of State Organic Programs, and the other Northeast certifiers. Vicki Smith of the New Hampshire Dept. of Agriculture has been especially helpful, as she also administers a State program and deals with similar situations.

To become accredited, I had to send a stack of paper about five inches thick to the USDA, including complete documentation of our procedures, copies of our supporting regulations, and copies of three years of documentation. I went to Washington in October of 2002 based on that information, and sent an auditor to review our program last June. When the auditor arrived, the first thing he did was fault us for not responding to a notice of noncompliance that the USDA never sent us. He then reviewed our files and interviewed the staff. By the end of the second day he had a list of 10 points we needed to correct, 3 of which needed to be corrected within 30 days or our accreditation could be suspended. So I sent in another stack of paper explaining how we were going to correct everything and got no answer yet as to whether or not it was sufficient. I think having another level of oversight will eventually help us to be better certifiers, but the transition has not been easy.

As much as I like to complain, I have to admit that the farmers are the ones that deserve all the sympathy in this situation. We all have a job and an income no matter what happens to the program. The farmers have had to face challenges such as increasing paperwork, stricter inspection, and record-keeping, not being able to use products that they had relied on in the past, and enduring poor yields from the organic seeds they were required to use. A few have decided that certification is no longer worthwhile for them, but most are still supportive of the program. They are hard working and dedicated, and I greatly enjoy working with them.
Organic Products Gain Momentum with Rule Implementation

The organic industry trade group gives its perspective on how the industry has fared under the first year of the NOP.

by Katherine DiMatteo
executive director, Organic Trade Association

It has been a year since the national organic standards were fully implemented on Oct. 21, 2002. Although it is too soon to measure the long-term results from having national organic standards, there are signs that already there has been progress made for the organic sector, starting with farmers and going through the supply chain to consumers.

Consumer trust

With national organic standards in place, consumers now have the assurance that products labeled as organic have been produced, processed and handled following requirements that were adopted based on intense industry input and public comment.

Although more consumer education is still needed, there is evidence that consumers are noticing the organic labels as more and more products are appearing in stores bearing the USDA Organic seal.


Of the households surveyed for the FMI report, 70 percent of consumers indicated their primary grocery store provides natural or organic foods; of the remaining, 18 percent said their store didn’t, while 12 percent were not sure.

Asked whether they preferred natural and organic products to be displayed in their own section or to be integrated in the store, nearly half (48 percent) said they prefer that organic products be stacked with their conventionally produced counterparts.

In addition, 160 of 1,001 respondents said they purchase organic products at least once a week, and an additional 190 said they make such purchases at a specialty grocer such as Whole Foods Market or Wild Oats.

The majority of those buying organic products got their conventionally produced counterparts.

Of those participating, 32 percent said it was somewhat or very important that their food is organic, while 67 percent indicated that organic food would become more common in the future.

The challenge came in February 2003 in the form of an Omnibus Appropriations Bill. The rider, although not overturning the national organic standards, would have undermined the standards by failing to provide USDA money to enforce the requirement of 100 percent organic feed for all livestock. In effect, if left to stand, it would have opened the door to lesser requirements for livestock feed, and made it impossible for consumers to trust the organic label on livestock-derived products, from meat and eggs, to dairy products.

This raised the ire of those already willing to meet the 100 percent requirement, as well as the Organic Trade Association, affiliated organizations, all companies believing in organic, and consumers.

Some legislators, who had been on the ground floor when the Organic Foods Production Act of 1990 had been enacted, stood and fought to overturn this rider. But not everyone who got on board to fight Section 771 in Congress did so because they understood the importance of organic integrity. Some legislators who helped overturn Section 771 did so because they believed in organic per se, but not in the need to have a firm grasp of the true meaning. Addition- ally, and much more concerning, is the low recognition of the perceived product benefits that are derived from organics, including taste, nutritional benefits, and others. Although the recent USDA label initiatives will provide awareness and credibility to the industry, marketers will need to take responsibility of communicating these key benefits of organic products to consumers,” according to NMI.

The initial list of accredited certification agencies announced in April 2002 showed 42 agencies (38 domestic agencies, and four from outside the United States) had successfully completed the accreditation process. This list has continued to grow over time.

As of Oct. 15, 2003, 88 certification agencies had been accredited by the National Organic Program (NOP). Of these accredited certifiers, 16 were from the remaining 35 companies from around the world. This reflects the importance other countries wishing to export organic products and ingredients place on the U.S. market for their products.

According to NOP, as of Oct. 29, there were 13 other certification agencies in the review process for accreditation. In addition, 28 other agencies had applied for accreditation but were still in the stage of supplying information to the U.S. Department of Agriculture before advancing further.

Meanwhile, according to NOP officials, since implementation the agency has received close to 100 complaints concerning compliance. These have sometimes centered on the integrity of a product or a certifier. Some of these have revealed mislabeling of products. Others have shown violations from non-accredited certifiers. There have been some companies that have been refused certification because they do not meet the requirements of the standards.

This shows that the system is in place and is being used to follow up on making people comply. USDA has said it will do an annual report on compliance, which will be a helpful tool.

Legislative challenge

Interestingly, the national organic standards were put to the test only several months into implementa- tion. The good news: the organic sector was able to uphold the integrity of the standards.

In the poll, 14 percent indicated they bought organic items at their local Wal-Mart or Target super center, reinforcing the fact that organic foods play a role in everyday American households. Twenty percent said they would pay approximately 20 percent more for organic foods, while 67 percent said that price was a barrier to their buying these products.

Certification agencies

Meanwhile, rather than reducing the number of certification agencies, national organic standards have encouraged additional companies to become accredited by the U.S. Department of Agriculture.

The bottom line: consumers need to be able to trust a label, and the new rule needed to be given a chance to work.

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There is another win that can be traced in part from this incident: growing congressional awareness of the importance of organic agriculture and products. As a result, the House has established a formal Organic Caucus, and the Senate has in place an informal organic working group. These developments signal a "coming of age" for the organic sector in the legislative arena.

Wider picture

Although not directly linked to the national organic standards, other provisions are falling into place for organic players. The first big step came when USDA's Risk Management Agency recognized that organic is a viable agriculture form, and thus could be covered under crop insurance through the Federal Crop Insurance Corporation. Other federal agencies are also working on organic provisions. For example, USDA's Economic Research Service is starting to collect production and price data.

Cost-share provisions in place to help farmers defray the cost of certification are an example of how organic farmers are being helped to meet national organic standards. This should encourage more farmers to get involved in organic agriculture, and result in increased availability of organic products for consumers. Cost-share provisions for producers and handlers can help overcome cost barriers to becoming organic, which, in turn, will help ensure increasing supply. The National Organic Program has information about cost share on its web site, at www.ams.usda.gov/nop/StatePrograms/CostShare.html.

In recognition of organic as a growing sector, the Census Bureau incorporated two questions on organic production in the 2002 Farm Census (one on total certified organic crops harvested and the second on the value of certified crops sold). It was a major "first."

Meanwhile, as a result of having national organic standards in place, the United States has been in serious negotiations with other countries concerning equivalency agreements that will facilitate the international trade of organic products. We can expect to see a possible agreement with the European Union, which is our biggest trading partner, within the next year or so.

During the past year, there has been significant progress with the European Union. The first year was spent chiefly trying to understand each other's organic regulations. Now, negotiators are working on actual wording for a possible agreement.

Research opportunities

On another front, during the past year the Organic Trade Association has launched the Organic Center for Education and Promotion, a not-for-profit organization to promote the use of organic products by collecting scientific evidence about organic agriculture and products, and to conduct educational programs about the benefits of these products.

Prior to having national organic standards, it was impossible to have meaningful scientific studies as there could be questions raised on the organic integrity of the products studied. However, now that there are standards, there are consistent requirements for what constitutes organic. This makes it possible for researchers to study the attributes of organic products more closely and accurately, with valid parameters.

New product category

The national organic standards have also opened up a new market for organic farmers and companies wishing to sell organic meat. Before the final rule was implemented, meat products produced organically could not advertise that on the label, but only that they were certified organic by a certification agency.

As a result, the organic meat market is one of the fastest growing categories in the organic sector.

Datamonitor projections show the U.S. organic market will have a five-year compound annual growth rate of 21.4 percent between 2002 and 2007, compared to 21.2 percent annual rate between 1997 and 2002.

Opportunities for retailers

There are a number of signs pointing to the fact that retailers have jumped on the organic food wagon. As more and more manufacturers have announced they were releasing certified organic products bearing the USDA Organic seal, retailers also became more excited about displaying and integrating them in their stores. Due to some confusion and desire to play it safe, however, some retailers have totally segregated organic produce from conventional counterparts, or have thought they had to package all organic produce to guard its integrity.

Overall, according to Supermarket News (Sept. 29, 2003), "Retailers like the National Organic Program. It's been good for business." Supermarket News reporter Roseanne Harper points out that the publicity surrounding implementation of national organic standards may actually be the factor that got more consumers interested in organic products. Retailers she interviewed also said that such standards have instilled consumer confidence. Also, retailers reported organic products are easier to find, and that it is easier to answer consumers' questions about organic products since there are specified agricultural and handling practices in place.

This and other articles, however, note that stores are struggling with whether to integrate or segregate organic products from their conventional counterparts. Depending on the store and the location, some are actually setting up stores "within a store" to have an organic or natural section, while others are integrating products, such as putting organic pasta and ketchup on shelves along side conventional counterparts.

Meanwhile, stores like Wegman's Food Markets, Price Chopper Supermarkets, Kroger Co., and Albertson's are offering more organic selections.
The entry of major companies

The entry of major companies to the organic marketplace sometimes is cited as a negative. I would argue that it can be seen as a positive. For instance, the more players, the more products will be available to consumers, who, in turn, will buy more products. This will result in more land under organic production, regardless of the size of the operation. And that will be better for our environment, our communities, and our planet. And, because there are national organic standards in place, the big players have to abide by the same rules as the small players, which means a big player can’t cut corners or capitalize on the organic claim without meeting strict requirements.

Their entry reflects a level of confidence in organic products, which should be viewed as a positive result. Some players came on or made investments as the national organic standards became a certainty. Such companies as Dean Foods, Frito-Lay, General Mills, M&M Mars, Tyson, Kroll, Kellogg, Earthbound Farm, Brown & Foreman, and Weetabix in Canada either offer products on their own or through a division.

And daily other companies enter with new products. Archer Daniels Midland Co., for instance, has introduced a new line of organic product. Campbell’s Soups is introducing its certified organic product, organic tomato juice. Even Ben and Jerry’s Homemde Inc. is test-marketing a line of organic ice cream, while the 7-Eleven store chain has added organic chips and other organic offerings. Gift food marketing company Harry and David, meanwhile, offered a mixed medley of organic fruits for the December 2003 holiday season. And organic foods are part of the menu on Songhs, Delta Air Lines’ new air service.

There is room for small players, medium-sized players, and large players. Some may produce for the local market, some for the national market, while, still others, for the global market.

Farmers’ opportunities

For farmers who already were certified organic, the changes need to comply with national organic standards have not been onerous. In fact, the standards may have eliminated competition from farmers who were claiming they were “organic,” when in fact they weren’t.

Also, with cost-share provisions from USDA distributed through the states, farmers have had some help in covering their certification costs. This was a proviso the Organic Trade Association sought, and is pleased to see it implemented.

Farmers will also find there are manufacturing companies and restaurants developing small family farms to supply them with locally produced quality organic products. For instance, Fairfield Farm Kitchens in Brockton, Massachusetts, seeks locally produced organic ingredients whenever possible. This is because more consumers are looking at the source of the foods they eat. Related to that, Community Support Agriculture (CSA) ventures and farmers’ markets are blossoming throughout the country.

Meanwhile, from a business point of view, organic standards give organic farmers legitimacy. For instance, organic operations can now apply for federal crop insurance.

Challenges ahead

Still, national organic standards for foods and beverages have made some industry players in segments other than food and beverages (such as personal care, cosmetics and fiber) anxious and eager for clear labeling guidelines for their products.

Organic agricultural ingredients in these product categories are covered under the requirements of the rule, but the end products aren’t. Anticipating this, the Organic Trade Association (OTA) has developed organic fiber processing standards, which are close to adoption by the industry. In addition, OTA has a Personal Care Task Force that is tackling some of the difficult questions still needing to be answered in this sector.

The organic status of these end products is at the point where the food industry was prior to the adoption of national organic standards. For some industry players and consumers, getting these issues resolved seems of utmost urgency. However, realistically, one must remember how many years it took to develop national organic standards for foods, and realize it may take years to resolve these questions for other categories.

Looming perhaps in the not-too-distant future will be an issue tied to a congressional mandate made this year, sparked by Sen. Ted Stevens of Alaska, that directs USDA to draw up a standard allowing wild fish to be labeled as organic. OTA will be active in coordinating the regulation and organizing comments to ensure that the full integrity of organic practices is preserved.

Meanwhile, price is often cited as an obstacle for gaining more consumer interest in buying organic products. Yet, even now, there are organic products being sold at or below the price of conventional products. With increased volume, prices are bound to fall. However, organic farmers will need to make sure they get a fair price for their products.

Conclusion

When asked whether national organic standards have met our expectations, I would answer “Yes.”

With the national rule in place, the organic sector has been able to provide a guarantee to consumers that organic products that are marketed using the new labeling in fact mean that specific practices were followed. And if products are mislabeled or companies or individuals break the rules, there are consequences.

We have seen more and more organic products being introduced, the number of certification agencies accredited by USDA has grown, and talks are progressing to expedite international trade of organic products.

This first year has been one of foundation building. We have been pleased to achieve more awareness of organic agriculture and products on the part of legislators, more interest by companies wishing to enter the market, and more and more retailers seeking certification even though such a step is voluntary.

With concerns about global security and measures to protect food safety, traceability is becoming a key word in the entire food industry. The organic sector is already proving that there is a way to trace food from farm to table, and showing how to do it successfully.

As Gary Hirshberg, president and chief executive officer of Stonyfield Farm, told Stagnito Communications for a September 2003 article in dairyfield#: “Despite the fact that some of us have been in this field for decades, I believe that we will look back 10 years from now, and see organic as big as double-digit shares, and view the standards as the beginning of a powerful spurt in the growth of organic foods in the United States and abroad.”

We have systems in place to guarantee the organic label, and can provide integrity and assurance. We can tell our consumers and customers that organic is the only label that regulates and prohibits the use of genetic engineering, sewage sludge, irradiation, antibiotics, and synthetic hormones. We have a story to bring about, and all hinges on having organic standards in place.

It is an interesting and exciting time to be part of the organic sector.

The Organic Trade Association is based in Greenfield, Massachusetts. Founded in 1985, OTA is the business association for the organic industry in North America. Its more than 1,300 members include growers, certifiers, manufacturers, distributors, retailers, importers, consultants, and more.

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®:
restoring our seed

by Eli Kaufman

"Most of the plant breeding programs of the twentieth century have totally failed to achieve their objective of increasing resistance to disease and pests. We have increasing the susceptibility of many of our crops to diseases and parasites."

Dr. Raoul Robinson

Did you ever wonder how generations of farmers without advanced degrees not only produced their own seed, but also developed the food-crops we eat today? We've created a vital organic movement, but almost forgotten a key aspect.

Seed-saving, once an essential skill passed from generation to generation, is almost a lost art. Although it's true that one is not born that more affects the well being of your system than the food, air and water that you put into yourself. If that is the case, are you putting crumbs of food in your stomach? Why do you think your soil will work if you only put in imbalanced nutrients? We need to go 'beyond organic'. With USDA involvement, growers have settled for the lowest common denominator. To me that is not what the organic pioneers were after in the first place. We need to strive for sustainable soil and food of a quality to nourish humans and animals optimally. My conclusions are the best ideas that I have come to after all these years. Like others such as Jack Lazor of Butterworks and Joel Salatin whom I greatly admire, I am striving to become a better grower to make my systems better every year."

We are in for an information packed and opinion packed treat this year at the NOFA Summer Preconference. Come learn from one of the organic movements most experienced practitioners.

Eliot will be teaching on Thursday August 12, from 1 p.m. to 5 p.m. and again on Friday August 13, from 9 a.m. to 12 p.m. We anticipate a high level of participation in the preconference (as in the previous two years); again it will be limited to 220 people, so it can be best to sign up early. Registration forms will be available in hard copy and online in April, just as we’re emerging from the cold and desolate winter. If the idea of fresh lettuce in mid-January appeals to you (and to whom doesn’t it appeal really?}, you’ll want to start considering the logistics of attending the preconference.

As a committee we believe the different appeal of the preconference presenter and the keynote speaker (as opposed to having the same person do both as in previous years) actually strengthens the overall conference program and hope that more people come to Hampshire than ever.

We spent our first committee meeting reflecting on last year's conference and looking ahead at 2004. The reflection included poring over your evaluations; the comments were very positive overall with some helpful suggestions about things to improve. We are pondering a slight shake up in the entertainment options, with a possible change in musical genre on Saturday night.

Right now is when we are beginning to line up the workshops for the 2004 conference. Julie Rawson is eager for folks to send in workshop and session ideas for the 2004 conference. She will be taking those ideas until the end of December, so now is the time to be bold. You can reach her at julie@mhof.net or 978-355-2853. Justine Johnson and Steve Lorenz are starting to line up children’s workshops. They, too, are hoping to have some new options and add to the diversity of the children’s program. You can reach them at johnsonlorenz@chartier.net or 413-527-1920.

Watch this space in coming issues for more information about the 2004 conference. In the meantime, you can check out the NOFA website (nofac.org) or the NOFA/Mass website (nofamass.org) for further information. In the interest of making the conference as accessible and easy to navigate for the newcomer as possible, we are in the process of trying to amass a collection of frequently asked questions (FAQ) about the summer conference. If you have some questions that you would like answered or would have liked answered when you first came to the conference, please direct them to either Eli or me by email or phone.

Restoring Our Seed is for everyone, from backyard seed-savers, and market seed growers to creative breeders. Visit www.nofamass.org for resources, a calendar of events and ways to be involved. Contacts: Eli and CR: humus1@netsvision.net ili - 207 872 9093 Matt Rulewich: marlevich@comcast.net Rowen White: rowenwhite@yahoo.com Jeremy Barker-Plotkin: bpc@the-spa.com

by Jeffrey M. Smith

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reviewed by Jack Kittredge

Most readers of this journal have probably already informed themselves adequately about genetically engineered foods. They know that some 70% of processed foods on American shelves now contain GE ingredients. They know that some 40% of America’s corn and 80% of our soy now have engineered traits. They are aware that our government has made an ideological decision that GE foods are safe and has never required any testing to prove this. They realize that proponents of this technology arrogantly assert that the food must be safe—Americans have been eating it for years and where are the deaths or diseases?

So one more book on the follies of biotech in agriculture may seem unnecessary. But with every new book on this topic come new readers whose eyes are opened and who begin to speak out in their families and communities. And it is only with that kind of grass-roots opposition that we will turn this technology around before it is too late.

Jeffrey Smith’s contribution to the literature about GE is well written. It goes behind the headlines and the studies to convey the impact of this issue on people and on the environment. His opening chapter on the work of Dr. Arpad Pusztie in England, and the way the political establishment there tried to destroy his reputation, would anger any right-thinking citizen. It is all too reminiscent of the treatment of Berkeley’s Chapela and Quist after their findings of widespread GE contamination of maize in its Mexican center of origin (also documented in this volume.)

Smith continually makes and reinforces the point, perhaps best stated by Nobel Laureate and Harvard biologist George Wald: “Up to now, living organisms have evolved very slowly, and new forms have had plenty of time to settle in. Now whole proteins will be transposed overnight into wholly new associations, with consequences no one can foretell, either for the host organism or their neighbors. [Genetic engineering] presents probably the largest ethical problem that science has ever had to face. Going ahead in this direction may be not only unwise, but dangerous. Potentially, it could breed new animal and plant diseases, new sources of cancer, novel epidemics.”

The book outlines the health dangers (going into detail about the mis-engineered L-tryptophan debacle), the incessant political deal-making that got GE the green light in Washington, the way the media have been duped and manipulated by sophisticated biotech PR operatives, the Starlink and BST scandals, and ends with a discussion of the importance of diet and suggestions for how people can avoid GE food.

Smith does a good job of explaining the technical aspects of the topic without losing the reader’s interest. It is well documented but also easy to read. If you are looking for a gift to educate a relative or friend about this topic, Seeds of Deception would be a good choice.
Organic Plug and Transplant Production

by Brenda Hedges

New England organic growers are waking up to the advantages of using plugs in their crop production. Plugs are containerized transplants with a self-enclosed root system. This past spring I was awarded a SARE grant to research the feasibility of growing organic plugs using different compost media and liquid organic fertilizer. I was looking to answer several questions regarding organic plugs:

- Are organic plugs feasible for the small grower?
- When should a grower purchase plugs rather than growing their own?
- What production methods are needed for quality plugs?
- What are the best media and fertilizers for growing plugs?

Conventional growers have known for years that plugs have several advantages over raising numerous seedlings in an open tray and then transplanting them hand to hand to a larger container. The traditional labor intensive method of transplanting results in considerable mortality from transplant shock or root loss. Growing with plugs results in less labor and time needed to transplant. Plugs literally pop out of their containers by hand to a larger container. The traditional method of transplanting is increased. Producing top quality plugs requires greenhouses that are irrigated and environmentally controlled. Growers need to be knowledgeable about cultural practices and scheduling times.

When growing plugs, more attention must be paid to the environment where roots can grow and function. Each seedling has a small amount of soil for its development. Within this space can be as few as 50 cells or as many as 512 cells that actually hold the seedling. Each seedling has a small amount of soil for its development. Within this space can be as few as 50 cells or as many as 512 cells that actually hold the seedling.

There are some disadvantages to growing with plugs too. Plugs are grown in small amounts of soil that results in rapid changes in moisture and temperature. When growing plugs, more attention must be paid to cultural practices and to scheduling times. The need for labor may be decreased but the need for mechanization is increased. Producing top quality plugs requires greenhouses that are irrigated and environmentally controlled. Growers need to be knowledgeable about cultural practices and scheduling times.

In order to test which media and fertilizer worked best, I set up six groups of seventeen trays each for a total of 102 trays. Each set of trays had a different compost media and fertilizer. Whereas conventional growers use soilless mixes for their plugs, organic growers use various composts blended with peat and vermiculite or perlite. Different types of organic fertilizers or rock powders can also be added to the mix. Mixes can be customized depending upon the needs of the seedlings being grown. There are several good composts available on the market that can be purchased by the bag or in bulk.

In growing plugs, the differences between organic and conventional production come down to the media and fertilizer. Whereas conventional growers use soilless mixes for their plugs, organic growers use various composts blended with peat and vermiculite or perlite. Different types of organic fertilizers or rock powders can also be added to the mix. Mixes can be customized depending upon the needs of the seedlings being grown. There are several good composts available on the market that can be purchased by the bag or in bulk.

In order to test which media and fertilizer worked best, I set up six groups of seventeen trays each for a total of 102 trays. Each set of trays had a different combination of media and fertilizer. Three media and two fertilizers were tested. Fafard Organic Compost, Intervale Germinating Mix and peat with lime and vermiculite were used as the test media. Sea Plus Liquid and Squanto’s Secret were the fertilizers chosen for the tests. Liquid fertilizers were chosen because they need to be delivered through an irrigation system for quality plug production.

Plug trays are usually 10 inches wide by 20 inches long. Within this space can be as few as 50 cells or as many as 512 cells that actually hold the seedling. Each seedling has a small amount of soil for its development. Within this small space the growing media must provide nutrition for the seedling, it must have an acceptable level of pH for availability of nutrients and it must provide an environment where roots can grow and function.

The small volume of soil in each plug cell makes the media subject to rapid fluctuations in moisture content, aeration, pH and soluble salts. Producing high quality plugs requires careful monitoring of all these aspects. In additional, physical and chemical properties of the media are important as well. Composts vary in their ability to hold water, their porosity or the size of the particles in the compost and the amount of aeration possible around the particles. The three media tested varied substantially in these properties.

The Fafard organic compost was dark, dense and made up of even sized particles. This compost is formulated to a standard pH of 6.2. The best aspect of the Fafard compost was that it was highly consistent with no foreign matter. Its worst aspect was that it was too dense a mix to use for plugs. This compost also compacted too readily. Vermiculite was added to this compost in order to test it for use in plug production.

The Intervale Germinating mix is made up of fairly dark particles of various sizes. This mix is lighter than Fafard and can be used unaltered for plugs. The germinating mix is produced with a pH of 6.1, well within the range for seedling production. The best aspect of the Intervale mix is that it can be used right out of the bag. The biggest drawback to it is that in some bags you’ll find large particles of wood and other debris that are too large for using in plug trays. You may need to screen these large...
particles out in order to fill smaller plug tray cell sizes.

The last media tested was a soilless mix of peat, vermiculite and lime. This mix was the lightest and most porous of the three. Dry organic fertilizers could have been added to this mix but I wanted to use it as a base line to test for the efficacy of the liquid organic fertilizers. The particles in this mix were quite small and allowed for less aeration of the roots but its water holding capacity was quite good. A drawback to this media was that it needed to be mixed and it was difficult to get the media hydrated. The peat is fairly resistant to water.

The two liquid fertilizers tested were Squanto’s Secret which is made from liquified fish protein and has a formulation of 2-4-2. Sea-Plus I is made from liquid fish with seaweed and is 3-2-2 (N-P-K). Of the two, the Squanto’s Secret worked best with the irrigation system. There was particulate matter in the Sea Plus which would plug the screens as the fertilizer was taken up into the system. This would lead to little or no fertilizer getting through to the plants until the screens were cleaned.

In order to measure our results, germination rates of the test varieties were counted and recorded. Growth rates were noted throughout the test period and samples of the plugs were sent for foliar analysis for the end of the five week growing period. In addition, the plugs were given to another grower to transplant out and grow to maturity. Field notes were recorded during this period.

It is easy to surmise that the plugs grown in the peat mix had the poorest performance. In both germination and growth rates, the peat plugs were behind the other two groups. The peat plugs also dried out most rapidly. The graph below illustrates germination rates for the three media types. The Intervale Compost had the highest number of plants germinating with the Fafard group having the second highest number.

Of the six groups tested, the Intervale Compost with the Squanto’s fertilizer had the highest overall growth rate. This group was closely followed by the Fafard and Squanto’s Secret combination. Overall differences in height of the plugs between these two groups at four weeks of age was less than an inch. Foliar analysis illustrated that the Fafard group had higher levels of nitrogen, calcium, and phosphorous but less potassium than the Intervale group.

Reports from the finish grower stated that all the test groups combining compost and fertilizer were of equal size and health within two weeks of being transplanted out. This finding led us to believe that regarding overall growth there were not significant differences between the composts and fertilizers chosen for this research. The differences in germination rates were worth considering and the Intervale Compost came out most favorably.

Upon completion of the research it was clear that growing plugs is feasible for any small grower with a greenhouse and adequate knowledge to start the plugs. Each grower needs to examine their own circumstances to determine whether it makes most sense to grow or purchase plugs for their operation. For top quality plugs the grower needs to pay attention to maximizing environmental controls as well as using quality seeds, media and fertilizer.

The ones that were tested were both adequate for seedling growth but like anyone on a quest; I’m still going to search for ones that work better.
Social Accountability in Sustainable Agriculture

by ISEAL (International Social and Environmental Accreditation and Labelling Alliance) representing: The Fairtrade Labelling Organization International (FLO); Social Accountability International (SAI); The Sustainable Agriculture Network (SAN); and The International Federation of Organic Agriculture Movements (IFOAM)

With the rise of socially and environmentally responsible consumerism, diverse actors along the product chain from primary producers to final consumers are turning to market-based tools to address social accountability. Voluntary certification and labelling systems can provide these tools through independent third party verification systems. There is currently a window of opportunity for gaining private sector commitment to adhere to stronger social standards as consumer concern about these issues is growing exponentially, fuelled by rapidly increasing food scandals, decreasing confidence in Government regulation and increasing awareness of social injustice in workplaces around the world. The organic market is developing rapidly into a dynamic - if not the most dynamic - segment of the mainstream food market; the Fair Trade market is heading in the same direction; and consumer concerns about human rights at work continue to grow. Given this, the private sector cannot afford to ignore these developments.

The extent to which certification and labelling systems for third-party verification can also help ensure a more equitable distribution of market benefits will depend on their ability to incorporate the concerns of diverse stakeholders, including: producers, retailers, consumers and workers. To that end, four non-governmental organizations – FLO, SAI, SAN and IFOAM – have come together to investigate how best to ensure broad-based social accountability in agriculture. All four groups are leaders in diverse aspects of socially and environmentally responsible certification. By working together to improving the links between the labour rights agenda, the environmental and the fair trade agendas in agriculture, this project hopes to strengthen all three agendas in the long run.

FLO, IFOAM, SAI and SAN will collaborate in the design and implementation of the present project over the next 24 months in order to: develop guidelines and tools for the implementation of social audits in sustainable agriculture applicable by FLO, IFOAM, SAI and SAN for a wide range of agricultural production systems and product chains; and foster closer co-operation between the initiatives through shared learning.

In order to achieve these goals, the four organizations will conduct a series of twelve pilot audits in 12 countries – developing and industrialized countries alike. The joint pilot audits will help to: develop best practice recommendations for methods for verifying safe and decent workplace conditions in diverse agriculture settings; and explore potential ways of conducting integrated audits, whereby producers can seek to demonstrate both social and environmental responsibility during one, comprehensive audit. The FAO provides technical support to the project and will help to disseminate information, including the findings of the pilot audit exercises.

The main objectives can be divided in the following sub-objectives:

• To develop guidelines for social auditing and standard setting in sustainable agriculture.

The issues to be addressed are:

• Compatibility of the participating organisations’ social aims;
• Balancing credibility and transparency requirements with producer needs and realities;
• Adapting the criteria for audit and certification to the scale of the farm;
• Social audit issues including the timing of the audit, migrant and seasonal workers, securing confidentiality of workers, occupational health and safety concerns over agrochemical use, addressing issues of working hours and defining a ‘fair wage’ among others;
• Internalizing social and environmental costs;
• Diversity of farming systems;
• Identifying synergies among participants and possibilities for moving towards mutual acceptance.

The project will be characterised by:

• Applied field research methods: all tools and guidelines will be tested under real life conditions in the field through 12 pilot studies;
• Participatory approach through intensive use of an interactive website to be launched by May 2002, e-mail discussion forums and the permanent participation of stakeholders through a global consultative group as well as through pilot country groups.

Expected outcomes and products

• A common understanding of what a social agenda for sustainable agriculture would entail and an agreed framework for moving in this direction.
• Recommendations on methods for conducting integrated social and environmental audits.
• Recommendations on next steps of collaboration towards a future of mutual acceptance.
• Improvements in the application of social auditing tools in the agricultural sector through shared learning and joint training of inspectors.
• Strategies to address particular needs of smallholder producers in relation to social and environmental certification and labelling systems.
• Recommendations regarding how to balance producer needs and country of production realities with the need for internationally applicable certification and labelling systems in agriculture.
• Recommendations regarding how to address issues of social accountability in the supply chain.
• Better communication and co-operation between the FLO, SAI, IFOAM and SAN (and more widely throughout the Consultative Group) in the areas of standards setting, inspection, certification, accreditation and communication to consumers.

The final results of the project will be widely shared through an international seminar foreseen in early 2004. The project has received commitments of funding from GTZ, the Biodiversity Fund of HIVOS and NOVIB and SIDA.
Calendar

Monday, January 5 & Tuesday, January 6: NOFA Interstate Council Retreat, Deerfield, MA for more info: Bill Duensing, (203) 888-9290.

Friday, January 9 to Sunday, January 11, 2004: Organic Vegetable Farming for a Living: A Farmer-to-Farmer Workshop Exploring All facets of Growing, Ballston Spa, NY, for info: Regional Farm & Food Project, 516/271-0744 or farmfood@capital.net

Thursday, January 15: “The Rare Breeds” Electronic Field Trip from Colonial Williamsburg will be broadcast from 10:00 am until 1:00 pm (EST), to find a broadcaster near you check out the web site listing: www.history.org/history/teaching/broadcast.cfm.

Wednesday, January 21 - Saturday, January 24: 24th Annual Ecological Farming Conference, Pacific Grove, CA, for more info: 831-763-2111, info@ecofarm.org

Wednesday, January 21 - Friday, January 23 and Monday, January 26 - Sunday, January 27: NOFA’s 3rd Annual Course in Organic Land Care, Worcester, MA. This course qualifies graduates to take the examination for NOFA accreditation as an Organic Land Care Professional, for more information, Marilyn Castriotta at 617-376-0510 or castriotta@aol.com.

Saturday, January 24: NOFA/MAss 17th Annual Winter Conference, Barre, Massachusetts, for more info: kate@earthlovers.org, (413) 586-5516 and www.nofa.mass.org/conferences

Monday, January 26, 2004: Deadline for Massachusetts, Connecticut, and Rhode Island NOFA members to buy through the Bulk Order. Forms received after that date will be too late. For more info: Bruce Wooster, (978) 356-0705, brubaker@TheWorld.com

Monday, January 26 – Thursday, January 29: NOFA Summer Conference, 411 Sheldon Rd., Barre, MA 01005 (978) 356-2217, jack@mhof.net, julie@mhof.net. Steve & Carol Moore, 717-225-2489.

Friday, January 30 – Sunday, Feb. 1: NOFA-NY’s Organic Farming & Gardening Conference, Syracuse, NY for more info: 516-922-7297, sarahjohnston@nofa-ny.org


Monday, February 9 – Wednesday, February 11 and Tuesday, February 17 – Wednesday, February 18: NOFA’s 3rd Annual Course in Organic Land Care, New Haven, CT. This course qualifies graduates to take the examination for NOFA accreditation as an Organic Land Care Professional, for more info: Bill Duensing, 203-888-5146 or cmiller@innova.org.

Wednesday, February 11: Food Processing Seminar, Greenfield, MA for more info: Don Franchey, dfm@starpower.net, 978-297-4171.


Sunday, February 22: Developing a Right-Sized Vegetable Farm Enterprise, Ballston Spa, NY, for more info: Steve & Carol Moore, 717-225-2489. sandmoore@juno.com

Friday, March 5 – Saturday, March 6: Passive Solar Greenhouse Workshop, for more info: Steve & Carol Moore, 717-225-2489. sandmoore@juno.com

Saturday, March 6: NOFA/NH Second Annual Winter Conference, Concord, NH, for more info: nofanh@innevi.com, 603-279-6146

NOFA Membership

You may join NOFA by joining one of the seven state chapters. Contact the person listed below for more info: Phone number, fax number, email address, website. NOFA membership includes a subscription to The Natural Farmer.

NOFA Interstate Council

* indicates voting representative

* Bill Duensing, Staff, 153 Bowers Hill Road, Oxford, CT 06478, (203) 888-9290.
* Peter Rothenberg, 35 Lanes Pond Rd., Northford, CT 06478, (203) 480-4570 (home), Northford@iaol.com.
* Tom Johnson, Whole Foods Liaison, 87 Wells Rd., Lincoln, MA 01773 (781) 259-0070, stlffer@es.com
* Larry Pletcher, PO Box 204, Warner, NH 03278, (603) 456-3121, lpletcher@conknet.com
* Elizabeth Obelenus, 22 Kyser Road, Meredith, NH 03253, (603) 279-6646, nofanh@innevi.com
* Karen Anderson, PO Box 886, Pennington, NJ 08534, (609) 737-9456, kanderson@nofanj.org
* Carol King & Lisa Engelbert, 840 Front Street, Westminster Rd., Hubbardston, MA 01452, Email: info@nofamass.org
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Interstate Certification Contacts

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Elizabeth Obelenus, 4 Park St., Suite 208, Concord, NH 03301, (603) 224-5022, nofanh@innevi.com

New Jersey: Individual: $35, family/organization: $50, Business/Organization: $100, Low Income: $15* 60 So. Main St., PO Box 886, Pennington, NJ 08534-0886, (609) 737-6848, certify@nofanj.org

Marya Richter, NOFA-NY, P.O Box 880, Cobleskill, NY 12043, voice: (518) 734-5495, fax: (518) 734-4641 office@nofany.org

Rhode Island: Individual: $20, Family: $35, Business: $50

Add $10 to above membership rates to include subscription to The Natural Farmer.
Western New York grain farmer Brett Kreher shows the 95 day corn variety he grows for animal feed. It gives a long ear by local standards.

News, features and articles about organic growing in the Northeast, plus a Special Supplement on

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