

Certification Notes & Tips

FROM THE OFFICE OF MIDWEST ORGANIC SERVICES ASSOCIATION

"The first of its kind with the organic operator in mind"

April 2002

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It's Annual Inspection Time!

Most 2002 organic plan questionnaires are in our office, and we have begun our process of initial review, in preparation for upcoming inspection assignments. Current efforts are primarily focused on new operators who have crops requiring an earlier inspection, such as maple syrup and greenhouse operations, operators who may require a more thorough initial review to ascertain ability to comply with MOSA Standards, and others whose geographic location requires an earlier inspection to enable cost efficiency. MOSA Associates who have not yet returned Farm Plan Questionnaires are subject to a \$100.00 late fee. Associates not renewing by June 30th will be subject to a \$200.00 late fee and noncompliance proceedings. Please contact MOSA if you have not received a Notification of Initial Review letter by June 1, or earlier if you were anticipating an early inspection. We are doing our best to speed the certification process for all operations this year, assisted by more reviewers (see "Staff Additions", below) and improved procedures.

...Some reminders as you prepare for inspection this year...

- **Initial Review Letter** - Please read this notification carefully, and promptly attend to any "Section A" items needed before your file can proceed to inspection. Delay in returning items may increase your inspection travel costs, or greatly delay your

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And the Verdict is...

Some National Organic Program language is rather grey and problematic when it comes time to tell operators how we and other certifiers are interpreting existing Rule requirements. Many astute operators have questioned these. We have "verdicts" on some issues, while others continue to be discussed. We'll provide definitive answers as they are developed. Following are some highlights:

Replacement Dairy Animals The National Organic Standards Board is recommending a new NOP § 205.236(b), stating (slightly paraphrased) that "the producer of an organically managed dairy may add to the herd by introducing: (1) a replacement dairy animal managed organically from the last third of gestation, *except*, that upon the direction of a veterinarian, the producer may administer livestock medications other than those allowed on the National List (OMRI) for emergency purposes during the first six months of the animal's life; or (2) When an organically managed replacement animal is not commercially available, a producer may add a replacement dairy animal from any off-farm source. These must be under continuous organic management upon entry to the organic operation, and no less than one year prior to the production of milk or milk products represented as organic." This recommendation balances requiring organically managed replacements with sustaining growth in organic dairy production by allowing conversion. It does not allow young stock to be temporarily removed from organic management.

Transitioning Feed NOP §205.236 (a)(2) allows dairy herds converting to organic to have feed for 9 months that is a minimum 80% "either organic or raised from the land that is included in the organic system plan and managed in compliance with the organic crop requirements". Most certifiers, including MOSA, now require that the 80%/9 month feed must only be certified or certifiable, (continued on page 2)

Staff Additions We are pleased to welcome a few new folks to the MOSA office. Many of you met **Robert Caldwell** during inspections last season, or several years back when he previously lived and performed organic inspections in our region. Robert joins MOSA as our Staff Inspector and Inspector Coordinator. We also welcome **Jan Lortie** who will handle our growing financial/accounts duties, relieving some of the responsibilities of **Susan Perry-Matteson**, who will focus more on associate relations, verifying sales and issuing TC's, and other duties related to program courtesy and certification efficiency. Several new CRC members also join our team and add varied experience to our decision-making processes. We expect the added efforts of **Jim Florin**, **Wanda Lewison**, **Michael Matteson**, and **Jody Padgham** to improve our certification turnaround efficiency at the decision stage.

Accreditation Update

We're nearing our inspection time as well. During February, MOSA completed its internal audit with respect to ISO 65 requirements, with positive results. We've also received early positive feedback from Washington regarding materials submitted in October. We continue to implement updated procedures and are preparing our response to an NOP desk audit of our materials. No date is yet set for our USDA site visit, but is understood that accreditation may precede site visits. MOSA continues to expect to be among the first group of accredited certifiers announced April 22nd.

MOSA Certification Review Committee

Paulette Bradley	Julie Marquardt		
Wanda Lewison	Michael Matteson		
Jim Florin	Aaron Brin	Linda Nash	Jody Padgham

Inspection Time (continued from page one) inspection. File reviews are generally conducted in an order geared to sending a batch to an inspector who will be in a given area soon after the review. Initial Reviews are not only intended to assess your compliance with Standards, but also are intended to remind operators of specific issues that will be addressed at inspection.

- **Inspection Checklist** - Enclosed with Initial Review letters you'll also find an inspection checklist addressing general items that should be organized prior to inspection. This checklist is updated from a version sent with Farm renewal information recently, and is newly created for processor/handlers.
- **Your Organic Plan** - We appreciate your patience with long form questionnaires required of all operations this year. More emphasis is being placed on these as a true representation of your organic management practices. You will be inspected for compliance to your plan as documented on the questionnaires, and these will be used by all certification staff in following years as well. As such, it is important that plans are complete, and updated whenever changes are made to your operation or management practices.
- **Inspection Fees** - Many have noted that it appears our fees have increased compared to this time last year. In fact our certification fees are the same, and inspection fees continue to be assessed at actual cost of time, travel, meals, etc. The difference is that we are asking for \$200.00 at application time this year, compared to last year when we asked for a \$130.00 inspection deposit. The \$200.00 fee will cover all inspection costs in most cases, with the difference credited toward user fees. Any inspection cost overruns will be billed separately as before.
- **Additional Verification** - A new section with this title is on 2002 organic plan questionnaires. Be sure to check with your buyers to see if verification of requirements not covered by the MOSA Standards is needed. These will need to be checked at inspection for MOSA to be able to provide written verification. You must notify MOSA if this or any section of your organic plan questionnaire needs to be updated.
- **ALA** - If you have not already returned your signed Associate Licensing Agreement, please have this for your inspector to add to your file. This will be required before certification can be granted or renewed.
- **OOPS!** - Many farmers have inquired where to provide information to MOSA regarding **transitional dairy feed**. This had been included in a draft version of the Livestock Plan, then cut while considering NOP changes requiring organic management from the last third of gestation for converted dairy herds. We then neglected to include a corrected table for describing feed for transitioning dairy animals as described in Standard 5.4.1.2. If you're transitioning dairy animals, please provide MOSA or your inspector with complete feed descriptions including beginning dates, certification status, ratios, and sources.

An Organic Incentive

MOSA recently received word that the Minnesota Natural Resources Conservation Service (NRCS) is making available Environmental Quality Incentives Program (EQIP) payments for producers converting from conventional crop and livestock production to organic production. The incentive payment is \$50/acre/year for organic crop production, or \$25/ac/yr. for livestock. Financial assistance is also available for producers installing numerous conservation practices including grassed waterways, ag waste management systems, and terraces. Interested Minnesota producers should contact their local NRCS, Farm Service Agency or Soil and Water Conservation District office for details before the 4/26/02 application deadline.

MOSA Standards Changes

The effective date for the recently issued 2002 MOSA Standards and Program Manual is April 4th. As noted many times now, these have been adopted to comply with the NOP. We believe these Standards present the requirements of the NOP in a more readable format. You also have received the NOP Final Rule with your renewal materials. Please review these carefully with respect to your operation, as some changes may affect the way you must manage your organic operation.

Most major changes have been addressed in this newsletter before (see the Oct. '01 and Jan. '02 issues), and some are updated in the "Verdict" article on the first page, and continued below. Here are a couple more areas where our requirements have changed...

Water Tests will no longer be required annually for many operators who have wells used for livestock or who wash crops. While initial water test results are required, annual water tests are not necessary if initial results are satisfactory. We still would like to see annual test results for water used in processing.

Crop Rotation policies have been discussed here often, and had been fairly prescriptive (4 yrs. maximum of row crop, 2 yrs. cover crop, etc.). These remain desirable practices, but do not allow for unique soil needs. Please review MOSA Standard 4.7 and the crop rotation definition in § 3.38, and follow the general principles of fertility management, conservation, and biodiversity.

Verdict (continued from page 1) not including transitional feed. The NOP, however, has given an *unofficial* interpretation that allows transitional feed as a part of this 80%/9 mo. portion, as it is "included in the organic system and managed in compliance with organic crop requirements." A verdict will be forthcoming.

Carriers Feed additives/supplements are routinely combined with incidental materials, carriers, often derived from agricultural products not identifiable on feed ingredient statements. The NOSB is recommending that the NOP *not* establish requirements for agricultural products used as carriers in feed ingredients, as these do not meaningfully affect the nutritional composition of the feed ration. Still, it is suggested that non-GMO statements be obtained when such carriers are present.

Please contact our office if you have any questions about the MOSA Standards or any aspect of the certification process...

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...or check out our website at www.mosaorganic.org

"MOSA provides reliable and efficient verification and certification services to organic producers and processors in the upper midwestern united states. MOSA's certification program is committed to maintaining a timely, efficient, courteous, accurate, transparent and consistent approach throughout the program and on a day to day basis."