

# Certification Notes & Tips

FROM THE OFFICE OF MIDWEST ORGANIC SERVICES ASSOCIATION

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

October 2002

## MOSA

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## National Organic Standards Effective October 21<sup>st</sup>

So, the month has come. The often discussed "October 2002" is here, and on 10/21, the "Final Rule" becomes fully effective. What "Final" will look like remains debatable, but it's certain we're at a landmark time for organic agriculture and a high point in a process that's consumed those at the forefront of organic regulation for well over a decade. We've provided much information in *Notes and Tips* on developing National Organic Standards (NOS) interpretation and keys to NOS use as issues have arisen. And for all of 2002, we've made certification decisions based on the NOS. MOSA has completed our primary accreditation steps, and we continue to be a strong voice in the Standards development process. You'll again note in several articles here some local implications from the most recent parts of the process. Here's the latest from the September 17-19 National Organic Standards Board (NOSB) meeting in Washington...

**Dairy Replacements** This issue was the primary discussed item. NOS § 205.236(a) created confusion regarding allowed replacement stock sources. The NOSB recommends that once a herd is certified organic, by conversion means or not, all replacement animals must be raised organically from the last 1/3 of gestation (NOT for just one year). The NOSB welcomes public comments until 10/15.

**National List Recommendations** The materials list moves toward needed updates, with NOSB votes on several items as noted here. These still require NOP approval.

**Chilean Nitrate (sodium nitrate)** An annotation allows unrestricted use for Spirulina production, with a 10/21/05 sunset. **Ozone** is a synthetic allowed for cleaning irrigation lines. **Livestock Medicinals** These synthetics (with any restrictions as noted), were voted (continued on page 2)

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## MOSA Staff Update

Lots of change this quarter... Our first Staff Inspector, **Robert Caldwell**, resigned his full-time position at MOSA to take on a needed role as new 4<sup>th</sup> Grade teacher at Viroqua's Pleasant Ridge Waldorf School. Robert performed half of our inspections over the past year. He is missed in the office and field, but has kept the door open for occasional inspection work between school years. **Mary Wilson** is expected to perform 200 MOSA inspections over the next year as our new Staff Inspector. **Kathy Casper** has been instrumental over recent years in MOSA's accreditation process and certification team. As our accreditation nears completion, Kathy will be pursuing other challenges, but also is leaving MOSA options open on an as needed basis. **Jodi Shrum** is training on Quality Manager responsibilities. **Ann Larkin Hansen** resigned from the Board of Directors to allow her involvement in other roles related to organics. You'll note many new names on our **Certification Review Committee**, greatly expanded to enable more efficient return of decisions. As **Jim Florin** and **Jody Padgham** depart, we welcome **Steve Gundlack**, **Sherri Shrofer**, **Glen Bernard**, **Lynn Tschumper**, **Jim Hallberg**, and **Catherine Irsfeld-Eddy**. See also our *Help Wanted* posting on Page 2.

## We Have Labels for Your Labels!

NOS § 205.303(b)(2) requires that all products labeled "Organic" or "100% Organic" must identify the certifying agent that certified the handler of the finished product. Also, § 205.307(b) requires nonretail containers to display applicable production lot numbers. All labeling must be compliant by 10/21. For a small fee, we have available stick-on labels to add to containers or existing labels to easily bring them into compliance. *Contact MOSA for details.*

## MOSA Gains ISO Accreditation!

MOSA's long-anticipated USDA accreditation site visit occurred last month. Two representatives audited our personnel, fees, certification process, and management structures for compliance with NOS and ISO 65 guidelines. MOSA just received its ISO (International Organization of Standardization) accreditation, seen as a key to MOSA's acceptance internationally. We await National Organic Program follow-up, but the auditors' exit interview indicated only a few **continuous improvement points**, echoed in our conditional ISO approval. Most pressing, we'll need to revise **inspection reporting forms** ("compliance checklists"), to better ensure that inspectors verify operator compliance with submitted organic plan questionnaire info as well as ALL applicable NOS requirements. Current reporting forms allow misinterpretation if inspectors are not thorough and detailed. Also likely to change is routinely required **water testing** for first-time applicants. If required by the CRC, water tests will be conducted at MOSA's expense. We must **contract with a lab** for all residue testing, and operators will need to **consent** to the use of the lab as an independent contractor. We must determine **crop rotation** acceptability on an *individualized* basis, rather than setting rules covering all situations. We'll need to improve our system for providing certification **cost estimates** to inquiring applicants. Our certificate format will need revision to remove implications of **expiration dates**. Last, we need to address the presence of **MOSA-certified (though non-voting) Board members**. *Please contact the office for details on these changes.*

### MOSA Certification Review Committee

Aaron Brin	Linda Nash	Paulette Bradley
Michael Matteson	Wanda Lewison	Julie Marquardt
Steve Gundlack	Lynn Tschumper	Jim Hallberg
Catherine Irsfeld-Eddy	Sherri Shrofer	Glen Bernard

**NOS** (continued from page 1) to be allowed: Bismuth Subsalicylate, Kaolin Pectate, Propylene Glycol (only for treatment of ruminants' acute ketosis), Activated Carbon (from vegetative sources only), Magnesium Oxide/Magnesium Hydroxide, Butorphanol (double FDA withholding period required), Xylazine/Tolazoline (for emergency use only, w/double FDA withholding period), Potassium Sorbate (only for use in livestock aloe vera products), and Calcium Propionate (for milk fever only). **Other Livestock Materials** Naturals voted to be allowed are Cell Wall Carbohydrates and Yeast Derivatives. And Heparin was voted to be a prohibited synthetic. **Processing Materials** Glucono Delta Lactone (only produced through carbohydrate microbial fermentation), Tetrasodium Pyrophosphate (only for use in textured meat analog products) and Activated Carbon (only from vegetative sources and for filtration) are newly voted as approved materials. **Livestock Materials Deferred** Of as much interest as materials allowed are those saved for discussion until the Oct. 19-20 Washington, DC NOSB Meeting. These include Mineral Oil (as a dust suppressant) - as in feed supplements, Proteinated Chelates, Atropine, Flunixin, and Furosemide.

It remains problematic how certifiers will decide on use of many materials not on the National List, and other areas where common organic practices are at odds with the NOS. **Ruminants' pasture**, for example, should provide "significant" feed value. "Significant" is difficult to quantify and requires individualized review, but our **Certification Review Committee will require many producers to increase pasture-to-livestock ratios** over coming years. Clearly, the "Final Rule" is still a work in progress. *Please contact the MOSA office for further details or clarification on these developments.*

#### ADVISORY COMMITTEE BACK AT WORK

Our USDA site visit (see "ISO", p. 1) raised several review points as we enter this season for MOSA program documents revision. In mid October our Advisory Committee will look at submitted proposals and amendments to MOSA policies found in the Program Manual. The MOSA Standards Guidance Document, traditionally updated at this time of year, remains static. No Policy changes were submitted from outside of the office prior to the September deadline. Those submitted by office staff should improve our communications and address minor non-compliances noted at our site visit. The proposal and amendment process is outlined in Program Manual section IX (pp. 50-51). Promptly contact us if you'd like to be personally apprised of the AC's recommendations, or watch our website for developments. **Note: December 6th is your deadline to submit proposed Bylaws changes.**

#### Thinking About Seed?

This time of year we receive many questions regarding organic requirements on use of organic and untreated seed. Per NOS § 205.204(a), organically grown seeds are required, unless an equivalent organically produced variety is not commercially available. Equivalency criteria are interpreted to include variety, quality and quantity, but not cost. While it's yet uncertain what organic seed availability will look like for 2003, it seems that organic seed production is increasing, as hoped, so it will be more difficult for growers to prove commercial unavailability. This is an area where we expect "screws to tighten" in 2003 and beyond. A minimum of three documented unsuccessful attempts from likely seed sources (example: notes regarding contact with sellers known to carry organic seed, or to carry particular varieties) is suggested to verify commercial unavailability. Remember the "early bird" adage also. Thinking now about organic seed for next year is strongly suggested. While MOSA generally has considered use of seed treated with prohibited substances a minor noncompliance in 2002, it's possible new crops grown from such treated seed may not be considered certifiable in 2003.

#### HELP WANTED

With MOSA's growth, we're seeking an additional full-time **certification team member**. The ideal individual will be a quick learner, a clear communicator, well organized and self directed, familiar with new office technologies, and will have experience with and commitment to organic principles. Possible tasks tagged for this addition include initial reviews of annually submitted organic system plans and support documents, coordination and development of our processor certification program, written and spoken communications with MOSA Associates, monitoring certification process efficiency and deadlines, and surveillance of certified operations. MOSA offers benefits, flexible scheduling, and a friendly office with high ideals. Please call for details and/or pass on the word to likely candidates. **The application deadline is October 18<sup>th</sup>.**

#### So, What about this "Monitoring"?

You may have noted many new questions sprinkled throughout the 2002 Organic Plan Questionnaires regarding how you "monitor" various aspects of your operation's management. These are directly reflective of NOS § 205.201(a)(3), which requires a description of monitoring practices/procedures and their frequency, to verify if "the plan is working". However, many operators seem to misunderstand these questions, or have left some of them unanswered. An eloquent Minnesota inspector points out that most successful organic operators are doing "monitoring" all the time, everyday. It may take the form of mental notes made when erosion develops, a walk in the field reveals stressed plants, or a change in fertility practices increases vigor. More formalized monitoring might also occur, as per soil tests or statistical analyses. Monitoring proves its worth when used as a management tool. Monitoring methods and frequency may not be apparent to the casual observer, but they are keys to understanding an operator's planning, which must be clear as we make certification decisions.

#### Tips for Plastic Disposal

A highly regarded IOIA Inspector has brought to our attention the difficulty with proper disposal of plastic bale and/or silage wrap. Some farmers want to burn it, but this is prohibited by the State of Minnesota and may be similarly regulated in other states. Laws aside, burning of such synthetics is clearly not an environmentally conscious choice, so is at odds with organic principles. The MOSA Guidance Document to the NOS states (section 5.5.9) that synthetic materials used for bale wrap and such shall be disposed of appropriately or recycled, and shall not be incorporated into the soil or burned. While there does not seem to be a clear prohibition on burning plastic written into the NOS, interpretation of several sections could cause burning of synthetics to be an organic certification issue. Disposal of synthetics is questioned in section 4D of our Livestock Plan Questionnaire - Long Form. The inspector noted that the Winona County (MN) Recycling Coordinator is working with the State on long-range solutions to the problem. Meanwhile, farmers can take plastic wrap to a transfer station and pay a fee for proper disposal, or contract with a waste hauler to have a dumpster on-farm. It's suggested farmers research their local options. We'd be interested in feedback on solutions found.

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

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**"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."**