

The Organic

CULTIVATOR



From Pasture(Land) TO PLATE

By Holly Born, Certification Specialist



PastureLand Summer Gold butter is made only when cows are grazing on grass at its peak in the summer. It is made in small batches by Pine River Dairy.

Photo provided by PastureLand

The Upper Midwest has been a center of the grazing movement for many years. Farmers are well aware of the many benefits of pasture, and now consumers are becoming aware, too. Dairy products from grass-fed cows have more unsaturated fats, fewer saturated fats, and more vitamins and fatty acids such as conjugated linoleic acid (CLA) and omega-3s (1). While health benefits are important, taste is also attracting more consumers. Flavor is affected

by the types of forage, soil, and climate where the cows graze, producing dairy products with the unique taste of that specific region. Regional and seasonal variation in taste of grass-fed dairy products has been a disadvantage for markets where consistency of product is important. Nowadays, foods with this regional identity are increasingly valued by American consumers as "local" has become trendy.

PastureLand Cooperative is a great example of successfully marketing all benefits- health, taste, and regional identity. When *Edible Twin Cities* magazine announced their 2010 "Local Heroes" awards, PastureLand Cooperative was named Best Food Artisan. PastureLand, formed in 1998, is a group of four certified-organic farms in Minnesota, including MOSA Associates Roger and Michelle Benrud of Goodhue and the

Stelling family of Millville, producing 100% grass-fed organic milk, butter, and cheeses.

Steve Young-Burns, CEO of PastureLand, says, "The new pasture rule doesn't really affect us. I was watching the USDA webinar on [this] and thought what's not to get about this? Then someone asked whether they could keep their cows in a tie-stall barn all day and I couldn't believe it. Our cows are on pasture 365 days a year except for reasons of cow health. I did wonder about calves – the rule says that calves up to 6 months old can be confined for stage of life reasons. PastureLand calves are kept confined for much shorter periods of time. Dave Minar [one of PastureLand's farmer members] says 'calves learn to be cows' by being outside earlier, and are much easier to handle later in life."

PastureLand's flagship product is Summer Gold cultured butter. Both salted and unsalted Summer Gold butters have received blue ribbons from the American Cheese Society. PastureLand only makes it when the grass is at its peak in the summer. Steve says, "Our butter's golden color is naturally derived from beta-carotene in our pasture grasses, giving our Summer Gold butter the look of condensed sunshine." The butter is made at MOSA-certified Pine River Dairy in very small batches. "We're very happy with Pine River Dairy. They do such a nice job. They culture our butter overnight and a part of our butter's flavor is from the culture. I even set up a Youtube channel (<http://www.youtube.com/user/PastureLandCoop#>) to show how our butter is made. They really take care in making our butter. [It] has never been better."

Due to the higher ratio of unsaturated to saturated fat, Summer Gold butter is almost spreadable at refrigerator temperature. It also contains about 82% butterfat—2% more than conventional butter—and this small increase in butterfat makes big improvements to baked goods. Other organic products include aged and mild raw milk cheddar cheeses. Five other specialty cheeses are made with PastureLand's organic milk. About 15% of PastureLand's milk goes into their products, with the rest sold as raw milk. The organic pre-

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FROM THE DIRECTOR

BONNIE WIDEMAN

The MOSA Board asked me to talk at MOSA's February 27th Annual Meeting about "Issues in the Organic Industry." "Issues" I take to mean challenges that thwart goals. I came to realize that there's a subtle difference between the organic industry and the organic movement. An issue for the organic industry would be something that impacts the ability of those engaged in organic production, handling and certification to make and sustain a decent living. An issue for the organic movement would be something that stands in the way of growth in organic production. These two goals may even seem contradictory sometimes: if we have growth in organic production and the prices for organic commodities are declining, the movement may be gaining speed, but the industry may be wary that more competition is causing oversupply. Issues like bad press for organics affect both the goals of the industry and the movement.

Here's my list of issues:

- Threat of genetically modified alfalfa
- Need for more "organic teachers"
- The economy
- The need for stable markets
- Challenges to organic dairy
- Need for more good press

Genetically engineered alfalfa is a threat to more than organic integrity. An environmental impact statement has been produced that denies any possible negative effect of GMO-alfalfa on non-GMO alfalfa. It has been near impossible to keep corn free from genetic modification. Keeping alfalfa free from contamination will be as futile as the efforts to save canola. The organic sector is like a little David fighting a big Goliath when it comes to challenging GMO alfalfa. When Secretary of Agriculture Vilsack was asked by a group of organic farmers in Vermont what he planned to do about the threat of contamination by GMOs, he suggested that new insurance products and more research on how to avoid contamination could help. "I'm not going to take sides," he said. "What is happening on the organic side is exciting." He pointed out, though, that of the 1.3 billion acres of farmland in the country, only 4 million are organic. "The question is, how can we help them co-exist." I encourage you all to contact your representatives in government and encourage them to take a stand against genetically-modified alfalfa.

My entire list of issues impacts the expansion of organic production, but despite these issues, production is expanding. Wisconsin and California lead the nation in organic production and the two major certifiers in those states grew in operations certified in 2009: MOSA by 11% and CCOF by 8%. To have growth in organic production of the type that is true to the roots of the organic movement, we **need more "organic**

teachers" to avoid the type of organic I'll call "input substitution." Examples would be crop farmers that ask, "How can I make enough money if I have to include hay in my rotation?" and huge confinement dairies whose only rightful claim to organic status is the feed they purchase. Input substitution organic is a far cry from the definition of organic put forth by the NOSB back in April of 1995: "Organic agriculture is an ecological production management system that promotes and enhances biodiversity, biological cycles and soil biological activity. It is based on minimal use of off-farms inputs and on management practices that restore, maintain and enhance ecological harmony." We need more resources to help transitioning farmers learn real organic farming.

Is the growth we're seeing also meeting the goal I gave for the organic industry--providing sustainable livelihoods for those involved in organic farming, handling and certification? My answer to this is that it depends on where you look for answers, but in most sectors of the organic industry, **the economy**, continues to be an issue of concern. The Organic Trade Association published charts showing the economic history of organics. In 2004, the organic industry had about \$12.5 billion in sales; in 2008, that was close to \$25 billion. There was no information for 2009 but, we all know that 2009 was a hard year for organics. What is being said by market researchers is that organic retail sales dropped .3% in 2009. Organic commodity crop farmers took a big drop in income in 2009; organic dairies dropped in income in 2009 and certifiers of farm operations, also. Despite our best belt-tightening efforts at MOSA, the year ended with expenses exceeding income by \$8000. Our economic well-being reflects that of our Associates. Here are some facts and figures about changes we have seen in the income of MOSA Associates: Average income per certified MOSA operation declined 8% from 2008 to 2009; In 2009, a relatively high number of certified handlers surrendered certification because organic sales either dropped or never developed, but overall in 2009 MOSA handler income grew by about 5%; Income of all MOSA producers dropped 10% in 2009; Income of MOSA milk producers dropped 8% in 2009; Income of MOSA non-milk producers dropped 11% in 2009; Income of MOSA direct sales vegetable producers increased in 2009.

**We need more resources to help
transitional farmers learn
real organic farming.**

The fact that we see organic producers who are selling directly to consumers are faring better in this economic downturn leads me to the next issue for both the organic industry and the organic movement: **the need for stable markets**. The shortest distance possible between producer and consumer seems to me the market of most stability. On my own little sheep and beef farm I'm learning a lot about marketing. I sold my steers three years ago at a fantastic price in the late fall. They joined other steers in Iowa and headed for a major natural food chain as grassfed

organic beef. I was hopeful for the same opportunity the next year but it didn't develop; I had no where to sell them except as organic hamburger (better tasting than the price I would have gotten!), and ended up buying a couple months of hay for them before sending them to a conventional sale barn. Don't know which made me feel worse—the profit for the year or the fact that they ended up in feedlots eating GMO corn out of steer stuffers. So I put a fairly feeble effort into direct marketing (a nice looking ad) and I soon realized I don't have the makings of a direct marketer—time, energy and patience. When a customer I had carefully cultivated and educated asked me "I'm paying on hanging weight? Why should I be paying for bone?" I knew I needed to adjust my plans. Also, as much as my lamb was priced really low, there simply weren't enough consumers within the reach of my time and energy to buy lambs from 100 ewes. I'm in a much better situation now that I have one more link the chain - the folks I sell my steers and lambs to do the direct marketing, but they also know me, my farm and my management so I'm really not too far from the consumers. My beef ends up at a store less than an hour away and the seller of my lamb can tell his customers about my farm because he's been here.

The **challenges for organic dairy** are to me summed up by saying that input substitution organic dairying took its toll on traditional sustainable organic dairying by flooding the market with milk and eroding consumer confidence through bad press. 2008 figures showed Wisconsin as second behind California in percentage of cows in the U.S. However, what is of interest to both the organic industry and the organic movement is that in California there are a total of 35,333 cows on only 94 farms, which means an average herd size of 376 per farm; in Wisconsin, there are 25,910 cows on 476 farms, an average herd size of 54 per farm. Hopefully, the new pasture rule will sift out dairies that are organic only because of the feed they buy and when we are successful in stopping the continual transitioning into organic of heifers on these same farms by changes in the regulations in regard to origin of livestock, we will see the playing field leveled for organic dairies and an end to the negative press.

The **need for more good press** is not just connected to organic dairy. I came upon this headline recently: "Going 'All Natural' Gets Old: Organics Faltering." The writer's name was familiar and with shock I realized that this was what had become of information I provided this reporter! The email I had sent him talked about the challenge of input substitution big dairies and why family-sized organic dairies were at a disadvantage and I gave him figures which showed that, while income of our farmers appeared to be declining, our certified organic acreage was increasing and the number

of operations leaving organic was holding steady. None of the information I had provided was used in the article and the following statement introduced what was shared by CCOF and MOSA: "A growing number of farmers are losing their certifications in the nation's two top organic states, California and Wisconsin." Sigh. Bad press has shown up in the strangest places! An article in the Des Moines Register about the good turnout for a farm show included, of all things, a section entitled "Big Farms Rule Organic Production." The article referred to the USDA's first full census of organic farming, noting that "big farms" dominate in Iowa as well as California. I did some math on the information they gave - that 310 Iowa organic farms produced a whopping 2.5 million bushels of organic corn. I did some math: if these 310 Iowa farms averaged 150 bu/A

in producing these 2.5 million bushels of organic corn, that means they averaged 54 acres of corn. It's a lot of cultivating, but does it really support the claim that "big farms dominate organic sales just as they do in conventional farming"?

WISCONSIN 2ND IN % OF COWS IN U.S.

**California: 35,333 cows on 94 farms.
Average herd size: 376 cows per farm.**

**Wisconsin: 25,910 cows on 476 farms.
Average herd size: 54 cows per farm.**

We need to see more good press, like the Minnesota Public Radio feature on carbon sequestration, picked up by the Rodale Press, that included an in-the-field interview with MOSA Board president Carmen Fernholz with his forage radishes. I believe that a story about the sustainable dairy farming that happens day-in/day-out on anyone of our 500 certified dairy farms is newsworthy as a balance to all the negativity that's been reported about organic dairy over the years. I would love to see a documentary on national television about the Food Farm in Wrenschall, Minnesota. This year's recipient of the MOSES Farmer of the Year award, the Fisher-Merritts have a model sustainable operation established that is worthy of tour buses. And I say this because they have deep roots in the organic *movement*, not just the "industry." At a field day I attended at the Food Farm, John Fisher-Merritt said he has always farmed organically because it's the right way to treat the earth; he's certified at the request of his one wholesale buyer. Now that's the spirit! It may seem like blasphemy for me as a certifier to applaud this, but organic production is about more than just the industry; it's about the organic movement. When the focus is on organic as a labeling term rather than as an ecological production management system, consumers and potential organic farmers will not see it in its true light.

Yes, there are issues....but, with springtime, with a new pasture rule and more good things coming from the NOP in Washington, with birds singing again and calves and lambs being born and green sprouts in the greenhouses....it is a time of hopefulness.

PASTURE RULE

NATIONAL ORGANIC PROGRAM

By Bonnie Wideman, MOSA Executive Director

Feb. 12, the National Organic Program released its Final Pasture Rule.

Background

The process of clarifying the pasturing requirements for organic livestock was a long one, beginning with the National Organic Standards Board's recommendation and request for a guidance document back in August of 2005. The Program put out a Proposed Pasture Rule in October of 2008, took comment on it, and made revisions culminating in the final rule before us now.

Implementation

The Rule went into the Federal Register on Feb. 17 and becomes effective 120 days later, on June 17. Operations that are certified before June 17, 2010 must fully implement the provisions by June 17 of 2011. Operations receiving initial organic certification after June 17, 2010 must comply prior to certification.

Major Changes with the Final Pasture Rule

- Organic ruminants must receive at least 30% of dry matter intake from pasture during the grazing season (minimum 120 days). This includes dairy calves over 6 mos. old.
- All bedding from roughage must be certified organic.
- Allowances for temporary confinement clearly defined.
- Grain-finished ruminant slaughter stock must still have access to pasture during the grazing season, but may receive less than 30% of their dry matter requirements from pasture during the finishing period.
- Producers of organic ruminant livestock must provide sufficient information about pastures and pasture management in their Organic System Plans and keep records that document these practices such that certifiers can verify compliance.

How Final Pasture Rule Differs from '08 Proposed Rule

Pasture requirement is based on "grazing season" not "growing season" and rather than calling for "continuous management on pasture," clarity is provided in the final rule with specific allowances for temporary confinement due to inclement weather, healthcare, handling, youth projects, dry off, breeding and calving. There is no requirement for sacrificial pastures, nor are there specific requirements for fences and buffer zones around bodies of water. Instead, the Rule states that pastures and livestock must be managed in ways that do not put soil or water quality at risk. In addition, feed documentation and pasture feed-value calculation requirements are less prescriptive.

Comments Still Invited Re: Slaughter Livestock Finishing

The Program welcomes comments indicating support or lack of support—with reasons for either—for section 205.239(d), which allows ruminant slaughter stock to be exempted from the requirement to receive 30% of nutritional needs from pasture during a finishing period that can't exceed whichever is shorter, 1/5 of the animal's total life or 120 days. Animals still must be provided access to pasture. These comments should be submitted before April 19, 2010. You are welcome, also, to express comments on this section to MOSA's Director, Bonnie Wideman, for inclusion in MOSA's comments to the NOP.

What should ruminant livestock producers expect to see change this year in terms of review and inspection?

We'll be mailing out the entire livestock section of the rule to all our producers once the NOP has the changes put into the existing rule and this is available to us, probably in June. See chart beginning on page 5 that shows the changes in the final rule and our description of what changes producers will have to make in both their practices and their recordkeeping to meet the requirements in different areas. Right now we're revising forms so that they enable us to gather all the information we need to verify compliance with the new rule. We're not asking that you submit any more information with your 2010 application than what our current forms ask for. At initial review, we'll identify what the particular areas are where we need more information.

This year we will have an "addendum" to our current livestock forms and we'll either be getting it out to you before inspection or have it for you and your inspector to complete together (in future years, these questions will be part of your Livestock Organic System Plan, not separate). The new requirements call for producers to make their own calculations of how much dry matter is required of animals and how much is provided. You will be able to use your own resources and the NOP's forms (on their website) to do this, but we also will be providing you with the resources you need and our own MOSA forms on which to make these calculations if you prefer to use them. Our goal is to do a thorough job of verifying compliance, but, at the same time, to not put our producers through any unnecessary work to show us the necessary information. We'll all have some learning to do in 2010—producers, reviewers and inspectors—but hopefully it will not be too burdensome.

For details see *NOP Final Pasture Rule - At a Glance* beginning on page 5.

NOP FINAL PASTURE RULE - At a Glance

Final Rule - Access to Pasture

§205.2 Terms defined.

The final rule revises the definitions of “crop” and “livestock” and adds 15 new terms.

§205.236 Origin of Livestock.

The final rule makes no changes to Origin of Livestock.

Issues pertaining to this section will be addressed in a separate rulemaking.

§205.237 Livestock Feed.

(a) The producer of an organic livestock operation must provide livestock with a total feed ration composed of agricultural products, including pasture and forage, that are organically produced and handled by operations certified to the NOP, except as provided in § 205.236(a)(2)(i). Except, That, synthetic substances allowed under § 205.603 and nonsynthetic substances not prohibited under § 205.604 may be used as feed additives and feed supplements, Provided, That, all agricultural ingredients included in the ingredients list, for such additives and supplements, shall have been produced and handled organically.

[§205.237(b)(1)-(6) are retained without revision from the original regulation].

(7) Provide feed or forage to which any antibiotic including ionophores has been added; or

(8) Prevent, withhold, restrain, or otherwise restrict ruminant animals from actively obtaining feed grazed from pasture during the grazing season, except for conditions as described under §§ 205.239(b) and (c).

(c) During the grazing season, producers shall:

(1) Provide not more than an average of 70 percent of a ruminant’s dry matter demand from dry matter fed (dry matter fed does not include dry matter grazed from residual forage or vegetation rooted in pasture). This shall be calculated as an average over the entire grazing season for each type and class of animal. Ruminant animals must be grazed throughout the entire grazing season for the geographical region, which shall be not less than 120 days per calendar year. Due to weather, season, and/or climate, the grazing season may or may not be continuous.

(2) Provide pasture of a sufficient quality and quantity to graze throughout the grazing season and to provide all ruminants under the organic system plan with an average of not less than 30 percent of their dry matter intake from grazing throughout the grazing season: Except, That,

(i) Ruminant animals denied pasture in accordance with § 205.239(b)(1) through (8), and § 205.239(c)(1) through (3), shall be provided with an average of not less than 30 percent of their dry matter intake from grazing throughout the periods that they are on pasture during the grazing season;

(ii) Breeding bulls shall be exempt from the 30 percent dry matter intake from grazing requirement of this section and management on pasture requirement of § 205.239(c)(2); Provided, That, any animal maintained under this exemption shall not be sold, labeled, used, or represented as organic slaughter stock.

(d) Ruminant livestock producers shall:

(1) Describe the total feed ration for each type and class of animal. The description must include:

(i) All feed produced on-farm;

(ii) All feed purchased from off-farm sources;

(iii) The percentage of each feed type, including pasture, in the total ration; and

(iv) A list of all feed supplements and additives.

(2) Document the amount of each type of feed actually fed to each type and class of animal.

(3) Document changes that are made to all rations throughout the year in response to seasonal grazing changes.

(4) Provide the method for calculating dry matter demand and dry matter intake.

Changes in Practices and Recordkeeping

The definitions are needed to support the new requirements for pasturing and livestock management.

None. Dairy operations that transitioned by 100% certified organic feed or before October of 2002 can still use transitioned replacements.

(a) No changes for MOSA-certified operations. This simply makes it clear to all certifiers and operators that exempt organic feed is not to be fed to organic livestock, and that all feed additives and supplements with agricultural ingredients must contain certified organic agricultural ingredients.

(b) (7) No change to MOSA’s interpretations.

(b) (8) Organic ruminants have to be provided with pasture during the grazing season typical to the region. Specific conditions that allow withholding pasture are given below in .239(b) and (c).

The Organic System Plan will need to provide a description of the grazing season and MOSA will confirm whether or not it’s typical for the region.

(c) Organic ruminants must receive at least 30% of their dry matter intake from grazed pasture as an average over the grazing season in that region. The grazing season may be interrupted by natural causes as described but may not be less than 120 days.

Up until this rule change, MOSA has required calves to have outdoor access at six months and pasture at 10 months (as the season allowed). The rule now allows temporary confinement of calves until six months, but after six months calves will need to receive 30% of their dry matter intake from pasture during the grazing season.

(2)(ii) Breeding bulls are exempt from the 30% requirement, but may not be sold as organic slaughter animals if they do not receive 30% from pasture.

(d) MOSA’s Livestock Organic System Plan already calls for descriptions of rations for the different classes of livestock during the grazing and non-grazing seasons. We verify feed produced and feed purchased through inspection. Livestock producers will be asked to keep consolidated records of feed produced and feed purchased and have this available for verification and submission at inspection. These records may be kept in a form that is most convenient for each operator, but MOSA will provide a form for this purpose, also.

The Livestock Organic System Plan will be modified to provide a means of showing the % of each feed type in the total ration. Livestock producers will need to choose and use a method of showing how the rations for different classes of ruminants meet the required dry matter intake from pasture. The National Organic Program has provided forms and information for this purpose. MOSA will be making revisions to the Livestock Organic System Plan that will provide a method for producers to calculate dry matter intake, also.

Livestock producers will need to keep records of when changes are made to rations. This will include keeping records of when pasture is provided and is not provided.

§205.239 Livestock living conditions

(a) The producer of an organic livestock operation must establish and maintain year-round livestock living conditions which accommodate the health and natural behavior of animals, including:

(1) Year-round access for all animals to the outdoors, shade, shelter, exercise areas, fresh air, clean water for drinking, and direct sunlight, suitable to the species, its stage of life, the climate, and the environment: Except, that, animals may be temporarily denied access to the outdoors in accordance with §§ 205.239(b) and (c). Yards, feeding pads, and feedlots may be used to provide ruminants with access to the outdoors during the non-grazing season and supplemental feeding during the grazing season. Yards, feeding pads, and feedlots shall be large enough to allow all ruminant livestock occupying the yard, feeding pad, or feedlot to feed simultaneously without crowding and without competition for food. Continuous total confinement of any animal indoors is prohibited. Continuous total confinement of ruminants in yards, feeding pads, and feedlots is prohibited.

(2) For all ruminants, management on pasture and daily grazing throughout the grazing season(s) to meet the requirements of § 205.237, except as provided for in paragraphs (b), (c), and (d) of this section.

(3) Appropriate clean, dry bedding. When roughages are used as bedding, they shall have been organically produced in accordance with this part by an operation certified under this part, except as provided in § 205.236(a)(2)(i), and, if applicable, organically handled by operations certified to the NOP.

[206.239(a)(4) of the original regulation is retained in this final rule].

(5) The use of yards, feeding pads, feedlots and laneways that shall be well-drained, kept in good condition (including frequent removal of wastes), and managed to prevent runoff of wastes and contaminated waters to adjoining or nearby surface water and across property boundaries.

(b) The producer of an organic livestock operation may provide temporary confinement or shelter for an animal because of:

(1) ***

(2) The animal's stage of life: Except, That lactation is not a stage of life that would exempt ruminants from any of the mandates set forth in this regulation;

(3) Conditions under which the health, safety, or wellbeing of the animal could be jeopardized;

(4) Risk to soil or water quality;

(5) Preventive healthcare procedures or for the treatment of illness or injury (neither the various life stages nor lactation is an illness or injury);

(6) Sorting or shipping animals and livestock sales: Provided, That, the animals shall be maintained under continuous organic management, including organic feed, throughout the extent of their allowed confinement;

(7) Breeding: Except, That, bred animals shall not be denied access to the outdoors and, once bred, ruminants shall not be denied access to pasture during the grazing season; or

(8) 4-H, Future Farmers of America and other youth projects, for no more than one week prior to a fair or other demonstration, through the event and up to 24 hours after the animals have arrived home at the conclusion of the event. These animals must have been maintained under continuous organic management, including organic feed, during the extent of their allowed confinement for the event.

(c) The producer of an organic livestock operation may, in addition to the times permitted under § 205.239(b), temporarily deny a ruminant animal pasture or outdoor access under the following conditions:

(1) One week at the end of a lactation for dry off (for denial of access to pasture only), 3 weeks prior to parturition (birthing), parturition, and up to one week after parturition;

(2) In the case of newborn dairy cattle for up to six mos., after which they must be on pasture during the grazing season and may no longer be individually housed: Provided, That, an animal shall not be confined or tethered in a way that prevents the animal from lying down, standing up, fully extending its limbs, and moving about freely;

(3) In the case of fiber bearing animals, for short periods for shearing; and

(4) In the case of dairy animals, for short periods daily for milking. Milking must be scheduled in a manner to ensure sufficient grazing time to provide each animal with an average of at least 30 % DMI from grazing throughout the grazing season. Milking

(a)(1) This section will require that inspection verifies the adequacy of feeding areas that are used for supplemental feeding or feeding during the non-grazing season to ensure that they are large enough to allow animals to feed simultaneously without excessive crowding or competition. Inspections will also need to verify that yards, feeding pads, feedlots and laneways are well-drained, kept in good condition (including frequent removal of wastes), and managed to prevent runoff of wastes and contaminated waters to adjoining or nearby surface water and across property boundaries.

(3) When it's appropriate, animals need to be bedded. All bedding from roughage will have to be certified organic. MOSA has previously allowed operations to use conventional bedding if handled in such a way that it would not be consumed.

(5)(b) Temporary confinement may only be for the reasons provided: stage of life (breeding, freshening, lactation are **not** stages of life); conditions that would jeopardize the health, safety or well-being of the animal; risks to soil or water quality; healthcare or treatments; sorting, shipping, sales; breeding; or youth projects.

(7) The allowance for confinement for breeding is a temporary confinement allowance and does not allow for heifers to be restricted from pasture until they are bred.

Livestock producers will need to keep records of when animals are temporarily confined and the reasons, and have these records available at inspection.

(c) Pasture or outdoor access may also be denied temporarily for the following:

- One week for dry off (no indoor confinement)
- Three weeks prior to birthing
- One week after birthing
- Newborn dairy animals up to six months (must not be restricted from free movement)
 - Short periods for shearing of fiber-bearing animals
 - Short periods for daily milking (milking frequency cannot restrict animals from getting 30% dry matter intake from pasture)

frequencies or duration practices cannot be used to deny dairy animals pasture.

(d) Ruminant slaughter stock, typically grain finished, shall be maintained on pasture for each day that the finishing period corresponds with the grazing season for the geographical location: Except, That, yards, feeding pads, or feedlots may be used to provide finish feeding rations. During the finishing period, ruminant slaughter stock shall be exempt from the minimum 30 percent DMI requirement from grazing. Yards, feeding pads, or feedlots used to provide finish feeding rations shall be large enough to allow all ruminant slaughter stock occupying the yard, feeding pad, or feed lot to feed simultaneously without crowding and without competition for food. The finishing period shall not exceed one fifth (1/5) of the animal's total life or 120 days, whichever is shorter.

(e) The producer of an organic livestock operation must manage manure in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, heavy metals, or pathogenic organisms and optimizes recycling of nutrients and must manage pastures and other outdoor access areas in a manner that does not put soil or water quality at risk.

§205.240 Pasture Practice Standard

The producer of an organic livestock operation must, for all ruminant livestock on the operation, demonstrate through auditable records in the organic system plan, a functioning management plan for pasture.

(a) Pasture must be managed as a crop in full compliance with §§ 205.202, 205.203(d) and (e), 205.204, and 205.206(b) through (f). Land used for the production of annual crops for ruminant grazing must be managed in full compliance with §§ 205.202 through 205.206. Irrigation shall be used, as needed, to promote pasture growth when the operation has irrigation available for use on pasture.

(b) Producers must provide pasture in compliance with § 205.239(a)(2) and manage pasture to comply with the requirements of: § 205.237(c)(2), to annually provide a minimum of 30 percent of a ruminant's dry matter intake (DMI), on average, over the course of the grazing season(s); § 205.238(a)(3), to minimize the occurrence and spread of diseases and parasites; and § 205.239(e) to refrain from putting soil or water quality at risk.

(c) A pasture plan must be included in the producer's organic system plan, and be updated annually in accordance with § 205.406(a). The producer may resubmit the previous year's pasture plan when no change has occurred in the plan. The pasture plan may consist of a pasture/rangeland plan developed in cooperation with a Federal, State, or local conservation office: Provided, That, the submitted plan addresses all of the requirements of § 205.240(c)(1) through (8). When a change to an approved pasture plan is contemplated, which may affect the operation's compliance with the Act or the regulations in this part, the producer shall seek the certifying agent's agreement on the change prior to implementation. The pasture plan shall include a description of the:

- (1) Types of pasture provided to ensure that the feed requirements of § 205.237 are being met.
- (2) Cultural and management practices to be used to ensure pasture of a sufficient quality and quantity is available to graze throughout the grazing season and to provide all ruminants under the organic system plan, except exempted classes identified in § 205.239(c)(1) - (3), with an average of not less than 30 % of their dry matter intake from grazing throughout the grazing season.
- (3) Grazing season for the livestock operation's regional location.
- (4) Location and size of pastures, including maps giving each pasture its own identification.
- (5) The types of grazing methods to be used in the pasture system.
- (6) Location and types of fences, except for temporary fences, and the location and source of shade and water.
- (7) Soil fertility and seeding systems.
- (8) Erosion control and protection of natural wetlands and riparian areas practices.

(d) Grain finished ruminant slaughter stock must still have access to pasture during the grazing season, but may receive less than 30% of their dry matter requirements from pasture during the finishing period. The finishing period can't be longer than 120 days or 1/5 of the animal's total life, whichever is shorter. Yards, feeding pads, or feedlots used to provide finish feeding rations shall be large enough to allow all ruminant slaughter stock occupying the yard, feeding pad, or feed lot to feed simultaneously without crowding and without competition for food.

Note: The National Organic Program is accepting comments on this exemption for slaughter stock finishing until April 19, 2010.

Livestock producers who finish ruminant slaughter stock will need to keep records of when finishing is carried out. Inspection of these operations will need to verify the adequacy of the finishing setup and that pasture access was provided if finishing was done during the grazing season.

(e) Some livestock producers may need to give added attention to manure handling since this requirement is reinforced by the requirement (above) requiring that yards, feeding pads, feedlots and laneways are well-drained, kept in good condition (including frequent removal of wastes), and managed to prevent runoff of wastes and contaminated waters to adjoining or nearby surface water and across property boundaries.

205.240 This section calls for pasture management to be included in the operation's Organic System Plan.

MOSA has always considered pasture to be a crop: field histories already require information on acreage and inputs; MOSA's farm Organic System Plan includes information on locations, soil fertility, erosion control and natural resource protection, but will be expanded to ensure that pastures are clearly addressed; pastures are already identified on maps, but detail will need to be added to show the locations of fencing, shade and water.

MOSA's Livestock Organic System Plan includes details on pasture type, management, and is being expanded to include details on grazing season.

As part of the initial review process in 2010, producers of organic livestock operations will be informed of what additional information will be needed in order for MOSA to verify compliance with the pasture rule changes.

HANDLING ORGANICS CERTIFICATION NEWS For Processor/Handlers

BY STEVE WALKER, PROCESSING and COMPLIANCE MANAGER
Spring NOSB Agenda is Set. It's comment time!

The next meeting of the National Organic Standards Board (NOSB) is April 26-29, in Woodland, CA. The agenda can be viewed online via the National Organic Program website. Contact MOSA for help or details. The online agenda includes links to documents on discussion items. The purpose of the NOSB is to make recommendations on materials to be allowed in organic production and handling, assist in standards development, and advise implementation of the Organic Foods Production Act.

Below is an overview of the upcoming discussion topics. Please note that these may change due to public comments and the work at the meeting. Please read the full recommendations and make comments. Public comments help.

Greenhouses, Hydroponics, and Aeroponics

The NOSB Crops Committee has a recommendation on standards for "terrestrial plants in containers and enclosures." Part of the discussion revolves around the place in organics for growing systems that do not use soil. The recommendation allows for use of non-soil potting mixes that do have organic matter and support typical soil-dwelling organisms. However, hydroponic systems that don't include organic matter in their substrates and aeroponic systems would be excluded from certification.

Nanotechnology

We'll get a status update on this ongoing NOSB discussion. Difficulty in defining nanotechnology has led to delays, and

the Materials Committee is requesting a technical and scientific review before proceeding. The aim is to NOT include in the term nanoscale sized products that have been allowed in organics, such as wheat flour dust or milk homogenization. However, intentionally engineered substances produced for properties that result only when these substances are in the nanoscale range are intended to be included in the definition, and excluded from organics.

Organic Label Issues

Issues regarding organic product label claims are on the agenda. First, the Compliance, Accreditation, and Certification Committee is recommending that the use of inert atmospheric gases in packaging should not prevent those products from using the 100% organic label claim. Second, a discussion document considers the development of a special seal to be allowed on products that are certified to the "Made With Organic..." (70%+ organic ingredients) labeling category. The MWO category has been subject to consumer confusion, especially if "organic" is also in the company name. The document notes that the USDA Organic Seal, not allowed on MWO products, but allowed on "Organic" (95%+ organic ingredients) or "100% organic" products, is widely used, and increases marketplace exposure for organic products. Up for discussion is whether or not a similar but less-prominent seal for MWO products would facilitate greater consumer confidence and increase growth in organics.

Material Inputs for Crops

Materials allowed in organic production are reviewed every 5 years to determine if they should remain on the National List. Most up for review at this time are recommended to remain on the List after their sunset dates in 2011 or 2012. For several, there is uncertainty as to whether they'll remain on the List. These include ferric phosphate for snail bait, fixed coppers and copper sulfate, and streptomycin for fire blight



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in apples and pears. Also, the Crops Committee has a recommendation on how to handle the current National List allowance for EPA List 4 Inerts in pesticides. This listing is outdated since the EPA lists have changed, and some of the items on that old EPA list can function as active ingredients. The proposal is for the NOSB to work with EPA to re-evaluate the materials on the list, classify some as natural substances to be allowed, and accept new petitions for consideration of materials that are synthetics. The proposed process would enable some grace periods for substances currently in use.

Livestock Production Materials

Many of these are also under sunset review. Most are recommended for re-listing, but the NOSB Livestock Committee is deferring recommendation on the following until more information is received: alcohols, aspirin, chlorine materials, glucose, glycerin, magnesium sulfate, copper sulfate, and EPA List 4 inerts. Also up for discussion, again, is methionine used in poultry rations. It's recommended that this stay on the National List until October, 2015, but with set limits to the amount used in diets. The goal is to step down the rate of use in order to encourage the development of alternatives.

Animal Welfare Revisited

At the fall, 2009 meeting, an animal welfare recommendation was passed. This needs further work. At the April meeting, a followup recommendation seeks to define "animal health care products" used to prevent illness or enhance health, clarifying

these are allowed for use in the absence of illness. Another followup recommendation clarifies that young stock can continue to nurse their mother's milk even if the mother has been treated with an allowed synthetic that has a withhold time. Also, the Livestock Committee is seeking public input on the stocking rate charts that were a part of the animal welfare recommendation.

Apiculture will be discussed at the April meeting. A discussion document was not posted at the time of this writing. MOSA participated in an Accredited Certifiers Association working group which offered feedback on developing specific standards for organic bees and honey production.

Classification of Materials

Last November, the NOSB passed a recommendation on classification of materials, that is, how we determine if a substance is synthetic, nonsynthetic, or agricultural. How materials are classified is a first step in determining if or how they have a place in organics. A new proposed addendum to that recommendation clarifies that chemical changes that occur when an agricultural material is processed by itself (toasted wheat kernels) or only with allowed nonsynthetic materials should not cause the product to be considered synthetic. Also up for discussion is a new document to be used by certifiers, by the NOSB, and by the National Organic Program in making materials classifications.

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GROWING ORGANICS CERTIFICATION NEWS FOR FARMERS

Organic Plan Update Information Due May 1st

Annual certification update forms were sent out to MOSA-certified producers in late January. They were in white 9x12 window envelopes with the MOSA logo by the return address. Here's a reminder that **the May 1 paperwork/fees deadline for producers is coming soon**. Please return your update forms and fees by the deadline to avoid late fees and compliance problems.

If you have special circumstances or needs, please let us know. We'll also need to know if you'll be discontinuing certification. Communication is a key to avoiding noncompliance issues. If forms and fees are not received by May 1st, and we've not heard from you as to why, we'll be sending noncompliance notices, and notifying the USDA.

Thanks for your cooperation. We look forward to working with you for another season.

Steve Walker, Compliance Manager

Organic producers are encouraged to register their operation in the Organic Farm and Vineyard Register. This voluntary online database was recently developed by the WI Dept. of Agriculture, Trade & Consumer Protection (DATCP).

"This is to reduce the risk of pesticide drift damage by providing pesticide applicators a database of where these sensitive crops are grown," said Laura Paine, Organic Agriculture Specialist for DATCP. "Both organic farmers and custom pesticide applicators have been asking for this. There are no costs associated with the registry. We're pleased to offer this service."

"All drift of pesticide sprays is illegal in Wisconsin," said Paine, "but accidental application of sprays to organic fields can result in 3 year's lost organic premiums while the farmer re-transitions the land for organic production." Organic land must be pesticide free for 3 years prior to certification.

To search the Organic Farm and Vineyard Registry, visit <http://datcp.state.wi.us/mktg/orgFarmReg/index.jsp>.

Fill out an online form at <http://datcp.state.wi.us/mktg/org-FarmReg/registration.jsp> or request a paper application. Contact: Laura at 608-224-5120, laura.paine@wi.gov ■

WELCOME ADVISORY COMMITTEE AND MOSA BOARD MEMBERS!

MOSA would like to welcome new members to the Board of Directors:

Bridget Holcomb is Associate Policy Director at Michael Fields Agricultural Institute and Laura Paine is an economic development consultant for the Wisconsin Department of Agriculture, Trade and Consumer Protection.

We also happily retained Board members George Kuepper of the Kerr Center and Carmen Fernholz, organic farmer and activist. Both were up for re-election. Special thanks to Sue Kastensen and Jeanne Merrill for their years of service to the MOSA Board.

And, finally, we welcome new Advisory Committee member Gary Zimmer and thank our other members for their willingness to continue with MOSA: Bob Scharlau, Jim Munsch, Emily Brown Rosen, and Wendy Everham.

Gabrielle Daniels, Newsletter Editor

	
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PastureLand

Continued from page 1

mium, especially for the milk produced during the winter months, is important to the cooperative's viability.

Relationships are key to PastureLand's success, including partnerships with Twin Cities natural foods co-ops and the Weston A. Price Foundation which promotes the health benefits of raw, grass-fed dairy products. Steve says, "We have a listing in the Foundation's newsletter and get a ton of referrals from them. We get a call for raw butter every day. I have to tell them that the butter's not raw, but it's 100% grass-fed, and we have raw milk cheeses, and they're thrilled. If we could do it legally, we would definitely get into the raw butter business."

Steve says, "2009 was great in some ways and challenging in others. Butter sales have been excellent. We're running out of butter now and to run out in March is amazing! In fact, our plan this year is to try to double butter production with the same number of cows."

However, the downturn in the organic milk market has hit PastureLand. "We took four pay price cuts for our milk in the last year, and then we lost our skim milk contract in the middle of winter. Thankfully, Westby Creamery stepped in to take the winter milk, but we have no guar-

antees past May. Our main focus this year is finding ways to insulate ourselves from the milk market by finding new things to do with milk. Milk's been around a long time and most of the things you can do with it have been done already, so it's hard to figure out new products. New technology has given us some options. We're looking at milk protein concentrates (MPCs) now as a possible way to use the skim milk. The challenge will be to create a market for value-added MPCs—American, organic, and grass-fed. MPCs make up such a small proportion of food products that cost shouldn't be a reason to not buy American MPCs. We are also looking at whey protein concentrates. Until the technology existed to isolate it, whey was pig food."

Steve concludes, "It's been a challenge, but we really believe in what we're doing. Grass-fed is better for the cows, the farmers, and the community." To learn more about PastureLand, visit www.pastureland.coop. A 2009 report on grass-based dairy products from UW-Madison's Center for Integrated Agricultural Systems provides more detail on grass-fed dairy. See the report: <http://www.cias.wisc.edu/wp-content/uploads/2009/09/gbdairyreportfinalowres.pdf>.

(1) Butler, Gillian, et al. 2008. Fatty acid and fat-soluble antioxidant concentrations in milk from high- and low-input conventional and organic systems: seasonal variation. *Journal of the Science of Food and Agriculture*, Vol. 88 No. 8. pp. 1431-1441.

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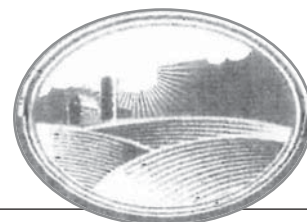
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EVENTS CALENDAR

April 7, 2010 Westby, WI

Providing a Marketable Product from your Grazing Dairy: Join Tom Torkelson, Master Cheesemaker and Laura Paine, WI DATCP Grazing and Organic Agriculture Specialist for this **FREE** seminar. Torkelson is the creator of Pasture Pride Naturals and Natural Valley Artisan Cheeses. Torkelson will discuss ideas to develop, sell, and market grassfed dairy products. Paine will highlight findings outlined in her new publication "Grass-based Dairy Products: Challenges and Opportunities." A meeting of the Vernon County Grazing Group will follow! Light refreshments will be served. Westby Community Center at 1 pm.

April 10, 2010 Madison, WI

2nd Annual International Raw Milk Symposium: Wisconsin was carefully selected as the site of this year's symposium because of the recent actions taken against Wisconsin raw dairy pro-

ducers and their customers. Wisconsin is the 2nd largest dairy state in the union, and the state with the most small dairies. Come to Monona Terrace Community & Convention Center, Madison, WI. For questions or to register by phone, contact Gene: 703-208-3276; gene@farmtoconsumer.org

May 1, 2010 Fort Dodge, IA

Central Iowa Organic Expo: Consumers, producers, vendors and educators are invited to this event, which will include breakout sessions, cooking demonstrations and an outdoor organic cookout. Contact: Patricia Rohan at theorganiclight@yahoo.com to learn more. 11am - 6pm at Career Education Building, Iowa Central Community College. ■



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ORGANIC CLASSIFIEDS

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Wanted: Certified organic beef, steers, heifers or cows, 500 lbs. and up. Prefer Hereford or Jersey crosses. 507-789-6679.

For Sale: Jersey cross bull calves to be born March and April 2010. Raised on Mom, closed herd, Yohnes free, MOSA-certified. Contact Bob Molini 608-875-5810

Wanted: Certified organic beef, steers, heifers or cows, 500 lbs. and up. Prefer Hereford or Jersey crosses. 507-789-6679.

Wanted: Ayrshire Farm www.ayrshirefarm.com in N. Virginia is looking for certified organic stocker, feeder, and finished cattle to help fill supply, which is falling short of demand. Contact Byron at bshelton@ayrshirefarm.com (540-592-3303) or Kim at kbelford@ayrshirefarm.com (540-592-7276) for more info.

LAND

Farmland For Rent: 2-5 ac. of organic certified land for rent. 20 more ac. available to larger operation. Sylvan Township, Richland Co., WI. About ½ hr from Viroqua, 20 min. from Richland Center. Negotiable rental amount depending on ac. rented, your use of machinery here and whether I prep ground. Machinery incl.: White 2-85 tractor, 3 bottom roll over plow, 10' disc, 6' rotovator, Alis G w/ 1 row cultivator, 24" wide rear tine rototiller, hand tools, mowers & more. Easy access to fields in all weather. Easy access for irrigation water. Good gravel drives & off-road parking. Safe play areas for kids. Good cell phone coverage. Freight dock for loading trucks. Possibility for cold storage to be constructed. Acres were in organic cabbage, squash, sweetcorn, brussels sprouts last year. Some ground will get horse manure compost. More compost every year. Also available, sawdust from local mills to add carbon to soil & rear discharge silage wagon to haul it. Also available big sq. bales of spoiled hay for mulch. Rental price \$85-350/ac. depending on use of equipment here. Will sign long term contract for extended land security. Contact Mark 608-538-3290. mkh@mwt.net

For Rent or Sale: All or part of 60 ac. tillable certified organic land, with some vegetable/farm equipment. Near Muscoda. Also pasture and sheep. 3 BR mobile home on property. Contact Doug: 608-225-4522.

FEED/SEED

For Sale: Cert organic rolled roasted soybeans. Also buying organic feed grade soybeans. Andersen Feeds, Inc. Galesville, WI 54630. 608-582-2595.

For Sale: Premium quality organic 3x3x6 3rd cut baleage. Moisture = 48%, crude protein = 23%, RFV = 145. Bales are 1,500 lbs, \$60.00/bale. Also 40 lb 2nd cut small square bales. Crude protein = 18%, RFV = 141. \$3.25/bale. Call Gabe at 608-452-3070.

For Sale: MOSA certified organic hay; small squares. Roland Sherry-Ferryville, WI – 608-734-3312

For Sale: 1500 bu. MOSA certified 2009 organic barley. Can deliver locally from Eleva, WI. 715-878-4107.

For Sale: Organic corn, oats, barley. Corn test wt 51 lbs. Moisture 14.5. Barley 90% germination. Oats have moisture 13.5 moisture. Call or email Tracy: twdoonan@yahoo.com and 309-235-5598.

Buy and Sell: Quality certified organic grains and proteins. Custom feed milling and soybean roasting. Bulk auger delivery in Wisconsin. Golden Grains, Sparta, WI. 608-269-5150.

For Sale: 1500 lb round certified organic round hay bales, stored inside. First cut bale, \$75; 2nd cut bale, \$95. Call James Wilson after 7 pm. 608-625-4130.

For Sale: 2000 bu ear corn MOSA certified. Will load on your truck. 608-269-2729.

For Sale: 2500 bu certified organic corn. 20 lg bales organic straw. 608-772-2592.

For Sale: Widest independent selection of certified organic & non-GMO seeds & related products at lowest possible prices. All major brands handled. Serving all WI & SE MN. Order early for best selection & price. Your #1 certified organic seed source. Golden Grains, Sparta, WI. 608-269-5150.

For Sale: 4000 2nd & 3rd crop very high quality small square leafy green MOSA certified organic bales. Mostly alfalfa & some grass. 920-427-6663.

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For Sale: Order now for spring delivery of cert org bedding plants. Vegetable, herb, & flower plants; many varieties; good quality plants; 10,000 sq ft of greenhouses. We use our own compost-based potting mix plus balanced organic nutrients. Taking pre-season orders: \$18 per tray for 128, 98, or 50 cell trays. www.weststarfarm.com or (608) 239-7570.

For Sale: New Holland Model 55, hay rake. Glencoe 10 ft. field cultivator. New Holland Model 38 flail chopper. Call 608-269-2729.

For Sale: 327 JD baler with kicker in very good condition. Hasn't seen a lot of use. \$3500 OBO. 920-427-6663.

For Sale: Yetter 11 shank heavy duty chisel plow, good condition. \$1750 OBO. 920-427-6663.

For Sale: XT75 Case skid loader. 800 hours in very good condition. \$14,500 OBO. 920-427-6663.

For Sale: 1370 Case tractor 20.8 x 38 tires. Runs and drives great with recent overhaul. \$6500 OBO. 920-427-6663.

For Sale: 30 400 watt metal halides or hps lights in very good condition. \$25 each. 920-427-6663.

For Sale: John Deere flame cultivator 200 gallon tank; runs 4 or 8 rows, 38" rows. Call Dan at 608-666-2023.

ATTENTION DAIRIES PROMO EXEMPTIONS

By Jackie Von Ruden, Farm Certification Manager

As many of you are aware, in January of 2005 USDA's Agricultural Marketing Service issued a final rule that exempts organic producers and marketers from payment of Federal assessments for the National Dairy Promotion and Research Program (NDPRP) if they meet certain criteria. MOSA is involved in verifying these criteria for those who apply for exemption. We've seen confusion over the years about the requirements so I want to explain what is required by the NDPRP. Producers must apply annually and meet the criteria in order to receive the exemption. These criteria are given in the application as follows:

- You must operate under an approved organic system plan authorized by the National Organic Program (NOP).
- You must produce only products eligible for a 100% organic label under the NOP.
- You must not have a split operation as defined by the Organic Foods Production Act of 1990.

These may not be self-explanatory so let me break them down for you.


- "Operate under an approved organic system plan" means that you must be currently certified by an NOP accredited

certifier like MOSA and your certificate must be active and in good standing. You need to submit a copy of your most recent certificate.

- "Produces only products eligible for a 100% organic label" means that you must not have any nonorganic production on your farm. This is not limited to just the dairy portion of your operation. It does not include personal use products such as a steer for the freezer, a small flock of laying hens for home egg use, or your personal garden. It also does not include certified organic animals marketed on the conventional market because the organic market is not yet developed, such as cull cows or bull calves. Management of breeding bulls is not considered either. However, it does include any animals or crops that are managed nonorganically and sold conventionally.

- The third requirement – "not a split operation as defined by the Organic Foods Production Act of 1990" – is somewhat redundant of the second requirement and requires again that you must not produce any nonorganic products on your operation.

Now to describe MOSA's role in this. Each year, we receive a long list of names of farmers who have already been granted the exemption and have reapplied for it. Throughout the year, we receive requests for any farmers newly requesting the exemption. We're asked to verify the information that you provide to the



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Roger G. - Madison, IN

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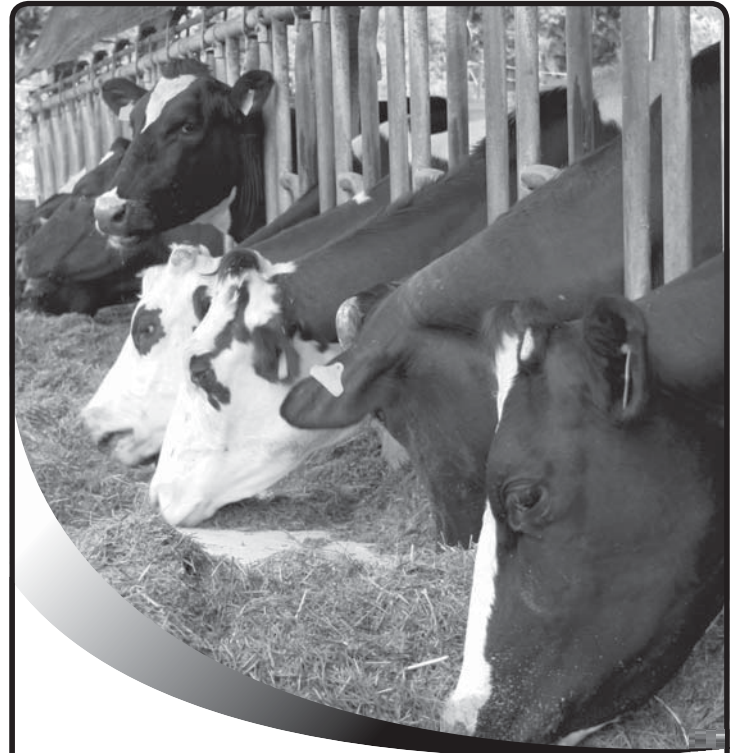
NDPRB on your Organic Exemption Request Form and we do this through the information that is provided in your Organic System Plan, inspection reports, field histories and list of certified products. The following suggestions will make this process simpler:

- You're asked to list nonorganic land (includes transitional) on your application for exemption. Make sure the land is listed the same as on your field histories.

- You're asked to list nonorganic animals on your application. You need to identify all animals that are raised nonorganically and sold nonorganically and the reasons behind this: are they for home use? Are they bull calves, cull cows or bulls? At inspection, make sure your inspector is clear on these same issues.

- You're asked to submit a copy of your certificate with the application. (They want this to come from you, not us.) Your most recent certificate is sufficient. You don't have to be through the process for the year and have an updated certificate, because the NDPRB asks us to verify that your certification is in good standing.

If you have questions about MOSA's verification process, direct them to me. Hopefully, my explanation has helped.



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MOSA'S MISSION STATEMENT

MOSA provides reliable and efficient verification and certification services to producers and processors primarily in the upper Midwestern United States. MOSA is committed to maintaining a timely, courteous, accurate, transparent and consistent approach throughout the program and on a day-to-day basis.

Visit the web! www.mosaorganic.org

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