



The Organic

CULTIVATOR

PASTURE RULE AND MOSA

**By Cameron Genter, Certification Specialist;
Jackie Von Ruden, Farm Certification Manager;
and Gabrielle Daniels, Editor**

Pasture Rule

The process of clarifying the pasturing requirements for organic livestock was a long one but the National Organic Program (NOP) released its Final Pasture Rule and it went into effect on June 17, 2010. All new operations that applied for certification after this date had to be in compliance in the 2010 season. Any farms certified prior to that date have until June 17, 2011 to be compliant.

Assessing compliance in 2010

Along with the changes to the pasture rule came changes with the paperwork. For the 2010 season, we created the Livestock Addendum to complement the Livestock Organic System Plan. The Livestock Addendum addressed basic information about pasture sizes, pasture management, and ration information for all classes of animals. Our challenge here was to obtain all the new information we needed and at the same time not overburden our farmers with unnecessary paperwork. After a full year of reviewing these Livestock Addendums, helping folks complete them accurately, and taking feedback on how they worked, we feel they were simple and effective.

One of the main things we did with the Livestock Addendum was to gather complete feed rations for all classes of livestock

in the grazing season and in the winter season. This allowed us to establish how much dry matter was needed (Dry Matter Demand) by each class of animal and how much dry matter was actually being consumed (Dry Matter Intake). Using the body weight charts along with the winter ration information, we determine the Dry Matter Demand (DMD). We subtract Dry Matter Intake (DMI) from stored feeds to estimate the percentage of pasture that animals are actually receiving. See the following example:

- 35 lbs DMD minus 10 lbs DMI from stored feeds = 25 lbs
- 25 lbs pasture divided by 35 lbs DMD = 71
- DMI from pasture during grazing season = 71%

We also reviewed pasture assessments from inspections. Inspectors assessed pastures and noted whether pasture is capable of meeting the 30% minimum DMI over the grazing season. Since the rule doesn't go into effect for the majority of MOSA's farmers until June of 2011, we didn't issue any non-compliances in 2010. However, we did identify areas where non-compliances will be issued in 2011 if changes



aren't made and in some cases we required farmers to submit a plan to come into compliance by 2011. We evaluated these plans and notified the farmer of our assessment. We also

noted what will be monitored in 2011. We see that most of our farms comply in most areas. The most common areas of potential noncompliance are the following:

- Young stock pasture has not provided 30% of the DMI;
- Pasture for young stock has not been provided until animals are close to yearlings;
- Dry cow pasture did not provide 30% of the DMI;

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FROM THE DIRECTOR

BONNIE WIDEMAN

I'm not a bird watcher but I'm a bird listener and when I walk out to my car to head to MOSA in the morning I hear those special bird songs that mean the advent of spring. Here on my farm we've boiled down a nice amount of maple syrup, the cows are moving slower as they get closer to their April calvings; we're got the shearer coming to shear the woolies and we'll trim over 300 sheep hooves on April 2 (oh, my aching back); and the critters will come off the pastures where they've been getting rolled out round bales and eat out of hay feeders for a month so they don't harm their pastures while we wait for real grazing time. It's a muddy but wonderful time of year on the farm.

I fit into the somewhat demeaning category of "hobby farmer"—160 acres and lots of critters but there's no way I can make a living off the farm and give up the job in town. And I like my job in town running MOSA—please don't think I'm just punching the clock running your certification agency because I can't make a go of it on my farm! But it's an issue for a number of us that having the skills to raise organic livestock or raise organic crops isn't in itself enough to ensure a livelihood.

I think that the fact that there isn't a well-established market for organic meat supported by processing and marketing infrastructure is the biggest challenge to the organic industry at this time. Organic meat sales are only 2% of the organic dollar that consumers spend, according to the Organic Trade Association. Organic grain growers don't have stable markets. There's a connection here. If you are an advocate for organic farming and you look around when traveling through the Heartland of America you might think, as you view endless fields of conventional corn and beans, "Oh, wouldn't it be wonderful if these thousands and thousands of acres of no-till conventional row crops were farmed organically?" but stop yourself and think about what type of farming would be successful. We don't need more organic corn and beans right now, do we?

If the demand for organic meat, milk and eggs were to grow, we would need more organic grain. As long as "natural" and "local" and unverified "grassfed" and "beyond-your-wildest-dreams-cool" hold sway in the marketplace as marketing claims enticing the consumer as claims on meat and livestock products, certified organic meat suffers and we're not

going anywhere with converting more acres to organic grain production. There's not any market for organic ethanol to my awareness.

So, what's to be done? On my part, I'm going to keep up my efforts to give certified organic meat the spotlight it deserves. Whether it's grain-finished or grassfed, organic is a verified claim that should be recognized for its value in the marketplace.

Grain finishing of organic livestock

We are still waiting for the National Organic Program to respond to comments on the requirements for grain-finishing beef. Hopefully this will happen soon before more damage is done to the industry.

Grassfed

Anyone can claim grassfed as a "voluntary" unverified claim, but if you meet the USDA standards for grassfed, MOSA is able to add this claim for organic beef, sheep and goats, and we invite you to talk to our certification staff about the requirements. I'm not a totally grassfed meat producer on my farm—I like to feed my growing youngstock a small amount of grain through the winter months—but I respect the production systems of those who are able to do total grassfed management and suggest verification for this market claim, for many consumers are interested in grassfed meat.

Agricultural Justice Project Certification

What else are consumers interested in? Consumers are interested in social justice verification. Many look for a label that shows that farms and businesses are certified for fair labor and marketing practices. For three years MOSA has been involved in a pilot program to explore this type of certification and now we are able to offer a verified social justice claim under the auspices of the Agricultural Justice Project. If you are a farm or an agriculture-related business that has labor practices and buyer-seller relationships that you are proud of and would like a label to reflect this, contact us at MOSA to find out more about what is involved in this program.

Recommendations for April NOSB Meeting

This newsletter has a focus on the issues that the National Organic Standards Board is taking up at their April meeting in Seattle. Steve Walker writes about the issues from a processor/handler perspective; Jackie Von Ruden shares the issues that affect crop producers and Holly Born has summarized the livestock issues. If you have opinions on any of these topics, you're encouraged to submit your com-

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Director

Continued from page 2

ments directly to the NOSB. When you take the time to comment, they really do listen. But you are also very welcome to convey your sentiments through MOSA as well—just give us as call or send us an email.

My "From the Director" wouldn't be complete without an update from the MOSA office. March Madness is a term that's used to describe all the basketball games this time of year but it's also a good descriptor of March in the MOSA office. Just when certification staff finish the 2010 farm reviews, the flood of 2011 early bird applications hits the office and the admin staff can hardly find their desks beneath the piles of applications demanding their attention, but they can't lose track of their phones because they're ringing off the hooks with calls about products and new folks inquiring about certification. We have 5 lines but I'm sure some of you have gotten a busy signal from time to time. Keep trying - we're ready for your call - and I'll close with one little reminder for farmers: **Monday, May 2nd** is the deadline for update farm applications and fees. We look forward to meeting your certification needs in 2011. Please get your applications in to us in a timely fashion.

REMEMBER!

DEADLINE IS MAY 2

FOR MOSA UPDATE PAPERS & FEES

MOSA must receive both update papers **and** update fees **in the office by Monday, May 2nd, 2011**. The deadline is normally May 1 but since this falls on a Sunday this year, the Monday immediately following this is the deadline.

Papers AND fees must be turned in by May 2 in order to avoid late fees and non-compliance. Sending in *only* fees or *only* papers DOES NOT meet the deadline requirements. If you have questions about this, contact MOSA for details.

MOSA's newsletter contains essential information to maintain organic certification. Each MOSA Associate is responsible for reading all MOSA communications, including the newsletter. If you don't understand a communication, contact MOSA immediately to get clarification.

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GROWING ORGANICS CERTIFICATION NEWS FOR FARMERS

CROPS COMMITTEE RECOMMENDATIONS FOR APRIL NOSB MEETING

Tetracycline The Crops Committee is recommending against the adoption of the petition to remove the expiration date on the use of tetracycline for fire blight control. If the majority of the Board approves, tetracycline will no longer be allowed for this restricted use after October 21, 2012. Several factors contributed to this decision, including information received regarding the manufacturing process; plant uptake and the appearance of tetracycline in plant tissues and exudates; genotoxicity to plants; risks to workers; and tetracycline resistance.

Nickel The micronutrient nickel was petitioned for addition to 205.601(j)(6) to allow the use of nickel sulfates, carbonates, oxides or silicates as plant or soil amendments when a micronutrient deficiency is documented. The Crops Committee has recommended against adding nickel to the National List of allowed synthetics because of the negative environmental impact of mining it, the fact that it is no longer produced in the US and must be imported, and toxic conditions around nickel refineries.

Sunset 2012 recommendations for §205.601

Chlorine materials The Crops Committee is recommending relisting chlorine compounds with a change to the annotation as follows: Chlorine materials (calcium hypochlorite; chlorine dioxide; and sodium hypochlorite)—Residual chlorine levels in the water in direct crop contact or as water from cleaning irrigation systems applied to soil should not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act. Chlorine products may be used up to maximum labeled rates for disinfecting and sanitizing equipment or tools.

Copper materials The Crops Committee is recommending the continued listing of coppers (fixed) and copper sulfate with the addition of language that requires periodic testing of the soil for copper levels. They wish to amend the current listing of coppers (fixed) and copper sulfate to read: (i) As plant disease control. (2) Coppers, fixed—copper hydroxide, copper oxide, copper oxychloride, includes products exempted from EPA tolerance, Provided, That, copper-based materials must be used in a manner that minimizes accumulation in the soil and documented through periodic testing and shall not be used as herbicides. (3) Copper sulfate—Substance must be used in a

manner that minimizes accumulation of copper in the soil and documented through periodic testing.

Alcohols The Crops Committee is recommending the continued listing of Ethanol and Isopropanol on §205.601 Synthetics substances allowed for use in organic crop production as algicides, disinfectants, and sanitizers including irrigation system cleaning systems.

Mulches and compost feedstocks Newspaper or other recycled paper without glossy or colored inks is being recommended for relisting on §205.601(b) as a weed barrier and on §205.601(c) as a compost feedstock and plastic mulches and covers are also recommended for relisting on §205.601(b)(2)(ii).

Pheromones The Crops Committee is recommending the continued listing of pheromones for insect management with the addition of an annotation that limits their use to passive dispensers, without added toxicants, and with only approved inert ingredients. Passive dispensers are those which emit pheromones by volatilization rather than by spray and produce a concentration of pheromones in a limited area. The motion is to amend the current listing to read: (f) As insect management. Pheromones, provided that they are in passive dispensers, without added toxicants, and with only approved inert ingredients.

Sulfur Dioxide Sulfur dioxide is not being recommended for relisting for underground rodent control only (smoke bombs) on §205.601(g)(1).

Vitamin D3 The Crops Committee recommends continued listing of Vitamin D3 on the National List §205.601 (g) as a rodenticide.

FRUIT GROWERS

See details regarding Streptomycin on this page.

Streptomycin Crops Committee is recommending against the continued listing of streptomycin for fire blight control in apples and pears. At the October NOSB meeting, a representative

of the Organic Tree Fruit Growers Association made public comment that the group supports continued listing of streptomycin, but restricting it to post infection use. Without a recommendation from the NOSB to continue the listing, strep will be removed from the list on October 21, 2012.

Lignin Sulfonate Currently, lignin sulfonate is listed on both 205.601(j)(4) – Lignin sulfonate – chelating agent, dust suppressant, and flotation aid-- and on §205.601(l) as a floating agent in postharvest handling. The Crops Committee is recommending relisting on §205.601(l) with the amended annotation: As a floating agent in postharvest handling, subject to wastewater disposal documentation in the Organic Systems Plan to prevent adverse impact to aquatic life. Also, they are recommending relisting on §205.601(j)(4) with the amended annotation: chelating agent, dust suppressant.

Magnesium sulfate The Crops Committee is recommending against the continued listing for magnesium sulfate to be allowed with a documented soil deficiency as a soil amendment. The Crops Committee requested and received a new Technical Report on this material. They did not find this Report to be sufficient and sent it back with questions about the differences between natural and synthetic magnesium sulfate, availability of both, and their respective functionality as soil amendments and foliar sprays. Most Crops Committee members felt that having the synthetic form of magnesium sulfate on the National List was inconsistent with organic crop production. The minority voted to keep this material on the List pending further technical review because of its long use and historic acceptance for use in organic crop production. Without a recommendation to continue the listing, synthetic magnesium sulfate will be removed from the list on October 21, 2012.

Sodium silicate The Crops Committee is recommending against the continued listing of sodium silicate to be allowed for tree fruit and fiber processing as a floating agent in postharvest handling. The Crops Committee requested but did not receive a Technical Report on this material. Without the benefit of the Technical Report, given limited information on the use and essentiality of sodium silicate, and in consideration that there is another allowed floating agent for the same purpose, the Committee voted unanimously against the continued listing of this chemical until a full technical review can be completed.

Corn Steep Liquor

Corn Steep Liquor (CSL) has been a widely discussed topic for the last couple of years. The article in our Handling Organics section on page 6 gives an excellent history. In short, the NOSB has to decide if the processing of CSL makes the end product synthetic. Last fall, they decided that it was synthetic, but were asked by the NOP to revisit their determination. The recommendation before us now is a reversal of the earlier decision deeming CSL produced via the traditional countercurrent corn wet-milling process nonsynthetic. CSL is a by-product of the wet-milling process, as is corn gluten, corn solids and other corn products, which are currently considered nonsynthetic and acceptable. Whether or not CSL is determined synthetic or nonsynthetic sets a precedent for materials review of agricultural waste products.

Chilean/sodium nitrate and Canadian Equivalence

Chilean nitrate This input has been discussed among MOSA's certification staff for several weeks and is written about in further detail in our Handling Organics section on page 6. Chilean nitrate is listed on §205.602 – the list of prohibited nonsynthetic

inputs. However, the annotation allows Chilean nitrate to be used if it is for no more than 20% of the crop's total nitrogen requirement. What is the issue? Chilean nitrate is allowed for organic use by the United States, but not by Canada, Europe, and other countries. Any crop product exported to any country where it is prohibited must be verified to be grown without the use of Chilean nitrate. This poses problems mainly for export between the US and Canada. Since exports to Canada are quite common, it's imperative that farmers are aware that this input is not allowed for product headed to Canada. This includes crops that are sold to US-based handlers and then subsequently shipped to Canada. All crop products grown in the US and shipped in either original or processed form must be verified to be grown without the use of Chilean nitrate. This presents challenges for certification and MOSA has determined that we need to note during the 2011 reviews whether or not Chilean nitrate is being used on crops for every crop operation.

The Crops Committee is recommending that Chilean nitrate be listed on §205.602 without annotation, meaning that it would be prohibited for use on organic farms. Because this material is due to sunset off the list in 2012, which would result in unrestricted use of Chilean nitrate, the Crops Committee has proposed a second recommendation maintaining the status quo in the event that there is any unforeseen impediment to implementing the first recommendation, giving a default recommendation to rely on. The second recommendation would continue the listing allowing the restricted use of Chilean nitrate.

Make Your Comment

If you have comments on these proposed recommendations, see page 15 of this issue for detailed instruction. Otherwise, please contact the MOSA office by April 22 and we will include your views in the public comments we will make at the NOSB meeting.

Jackie Von Ruden
Farm Certification Manager

METHIONINE FINAL NOP DECISION

DL-Methionine, DL-Methionine-hydroxy analog, and DL-Methionine-hydroxy analog calcium (CAS # 59-51-8; 63-68-3; 348-67-4) have been re-approved for use in organic poultry production until October 1, 2012 at the following maximum levels of synthetic methionine:

- Laying chickens—4 pounds per ton of feed;
- Broiler chickens--5 pounds per ton of feed;
- Turkeys and all other poultry--6 pounds per ton of feed.

Holly Born
Certification Specialist

HANDLING ORGANICS CERTIFICATION NEWS For Processor/Handlers

HANDLING RECOMMENDATIONS FOR APRIL NOSB MEETING

On April 26-29, the National Organic Standards Board (NOSB) will meet in Seattle to receive organic community input and vote on new recommendations. Finalized recommendations are submitted to the National Organic Program (NOP) for further consideration and potential inclusion in the federal organic regulations. Below is a summary of meeting topics that may be of interest to certified organic processors and handlers. We encourage you to follow the NOSB process and provide comments on current recommendations.

Petitioned Materials for Processing

Attapulgit, a natural substance used to remove impurities such as undesirable odors, colors, and trace metals in oils, is recommended for addition to the National List as an allowed processing aid for oil handling.

Calcium Acid Pyrophosphate was petitioned for use as a leavening agent for organic baked products. Sodium Acid Pyrophosphate (SAPP) is already listed for this purpose, and although there is mention of the fact that Calcium Acid Pyrophosphate could be substituted to reduce sodium content of organic baked items, the petition didn't say whether sodium reduction would be significant enough to justify adding another synthetic material to the National List, or even if organic consumers want lower sodium content in baked goods. Calcium Acid Pyrophosphate also failed to meet criteria for listing due to environmental concerns in its production. It's not recommended for addition to the List.

Silicon Dioxide is petitioned to be *removed* from the National List. It's a common food additive, used primarily as a flow agent in powdered foods, to absorb water in hygroscopic applications, and to suppress foaming in liquids under agitation. It's also the primary active component of diatomaceous earth, which has many uses ranging from filtration to insect control. In 2007, public comment asserted that silicon dioxide was no longer needed on the National List due to the availability of a certified organic alternative substance. The comment was provided by the manufacturer of the proposed alternative substance. Since '07, some evidence has demonstrated the utility of an alternate in some applications where silicon dioxide is presently used.

The Handling Committee wants to encourage the growth of agricultural—and preferably organic—alternatives to nonagricultural substances presently allowed on the National List for use in organic handling operations, and considers this to be just such an opportunity. However, the Committee is concerned that alternatives do not exist for all silicon dioxide applications; public comment is sought. Specifically, the Committee wants to know what alternatives to silicon dioxide are available and effective for use as: anti-caking agents in foods and feeds; stabilizers in beer production; adsorbents in tableted foods; carriers, defoaming agents, and other uses allowed under FDA. Food manufacturers' comments are particularly needed.

Another petition for consideration seeks to expand the allowance for use of *Sodium Acid Pyrophosphate* to include its use as a sequestrant on cooked and uncooked produce. It's currently listed "for use only as a leavening agent." The Handling Committee recommends against expanding the allowance, saying the petitioner did not provide compelling evidence that the material is necessary or essential to organic handling; and saying a survey of organic handlers did not reveal any who actually would use this material if it was listed.

Handling Materials for Sunset

All materials on the National List must go through NOSB "sunset" review every 5 years, after which the Board may recommend the listing be removed, extended for another 5 years, or further restricted or clarified via annotation. The Handling Committee is recommending that the allowances for use of *enzymes* and *tocopherols* be *extended* for 5 more years. The Committee recommends that the current listing of *Potassium Iodide* be *removed* from §205.605(b), saying it's already included under the listing for Nutrient Vitamins and Minerals.

Nutrient Vitamins and Minerals are also up for sunset review. The Handling Committee intends to restore a 1995 NOSB recommendation on "The Use of Nutrient Supplementation in Organic Foods." This recommendation proposed that the use of synthetic vitamins, minerals, and/or accessory nutrients in organic products should be limited to that which is required by regulation or recommended for enrichment and fortification by independent professional associations. The recommendation said, "the term 'accessory nutrients' means nutrients not specifically classified as a vitamin or a mineral but found to promote optimum health." This was intended to open options for future nutritional discoveries, with the category boundaries maintained by

the state of current scientific literature and expert opinion. However, when the National List was finally proposed, a different annotation appeared: “in accordance with 21 CFR 104.20, Nutritional Quality Guidelines for Foods.” This altered the scope and meaning of the intended authorization and created significant confusion and conflict. Fortunately, the NOP interpreted the annotation in a manner that circumvented its more confusing and inappropriately restrictive aspects. Organic certifiers and businesses relied in good faith on these interpretations. Over the years, innovative product developments have included the nutrient materials authorized by the NOP’s determinations, and these are highly valued by organic consumers. The Handling Committee believes that the National List should now be clarified by changing the listing to read: “Nutrient Vitamins and Minerals, restricted to materials required or allowed by law for the purpose of enrichment, supplementation or fortification of foods including infant formula, and materials the use of which is supported by the FDA or the Institute of Medicine of the National Academies.”

Chlorine Materials

In December 2010, the NOP issued draft guidance clarifying the use restrictions of chlorine materials in organic production and handling. On review of this draft guidance, and informed by public comment and a new technical review, the Handling Committee is recommending a change to the listing for chlorine materials to read: “Chlorine materials (calcium hypochlorite; chlorine dioxide; and sodium hypochlorite) may be used up to maximum labeled rates for disinfecting and sanitizing food contact surfaces. Chlorine materials in water used in direct crop or food contact is permitted at levels approved by FDA or EPA for such purpose, provided the use is followed by rinse with potable water that does not exceed the maximum residual disinfectant limit for the chlorine material under the Safe Drinking Water Act. Chlorine in water used as an ingredient in organic food handling should not exceed the maximum residual disinfectant limit for the chlorine material under the Safe Drinking Water Act.”

The current National List annotations for use of chlorine materials have created confusion, and also are inconsistent with the intent of a previous (1995) NOSB recommendation. That recommendation stated that chlorine materials should be allowed for use in organic crop production, organic food processing, and organic livestock production with the following annotation: “Allowed for disinfecting and sanitizing food contact surfaces. Residual chlorine levels for wash water in direct crop or food contact and in flush water from cleaning irrigation systems that is applied to crops or fields cannot exceed the maximum residual disinfectant limit under the Safe

Drinking Water Act (currently 4mg/L expressed as Cl₂).” This annotation was crafted to acknowledge municipal drinking water chlorine levels were considered acceptable for organic food production and handling. However, the language used in the proposed NOP rule published in March 2000 did not include the terms “in direct crop or food contact” nor “in flush water ... that is applied to crops or fields.” And the language under §205.605 (handling uses) only mentions use in disinfecting food contact surfaces, leading some handlers to question whether chlorine could be used in direct food contact. The NOP clarified that the use of the term “residual chlorine” referred to the chlorine that was present in water when it exited the facility as effluent.

The NOSB revisited the chlorine issue through a May 2003 recommendation. This clarified that residual chlorine (also called free or available chlorine) is the chlorine that remains available in solution after the disinfection step is complete, when the initially added chlorine material has been reduced by reaction, bound to the organic matter, or evaporated. The residual chlorine is what is still available to oxidize other substances. In 2003, the NOSB also stated: “The Organic Foods Production Act is not designed to function as a waste water regulation. Instead, it is a regulation designed to protect organic integrity. As such, processing operations must demonstrate compliance with the chlorine annotation by monitoring the chlorine content of the water which is in direct contact with organic products, not the wash water which is discharged from the facility.”

Classification of Materials

The Materials Committee will present further work on the ever-challenging topic of materials classification, processes by which the NOSB determines whether substances are synthetic versus non-synthetic substances or agricultural versus non-agricultural. A complete proposed guidance document is not yet available, but new work considers the definition for chemical change, what constitutes a significant amount/level of synthetic input remaining in a material, and the scope of classification.

In 2009, the NOSB defined *chemical* change as “an occurrence whereby the identity of a substance is modified, such that the resulting substance possesses a different distinct identity.” An April 2010 NOSB-approved addendum clarified that processing of agricultural products using allowed methods and materials does not result in chemical change as it applies to classification of materials. This was the focus of much public comment at the April 2010 NOSB

Please turn to **NOSB** on page 14

LIVESTOCK STANDARDS

ANIMAL WELFARE RECOMMENDATIONS APRIL NOSB MEETING

The Livestock Committee of the National Organic Standards Board (NOSB) has published recommendations related to animal welfare that will be voted on by the entire board at the April meeting in Seattle. These recommendations would add to the 2009 proposed changes to §205.238 Livestock health care practice standard and §205.239 Livestock living conditions and also create a new standard §205.241 Humane handling, transport and slaughter: general conditions of animal welfare in handling and slaughter.

§205.238 Livestock health care practice standard

Some physical alterations would be specifically prohibited: beak removal; castration, dubbing and detoeing poultry; tail docking for pigs and cattle unless needed to treat injury; wattling and face branding cattle; mulesing and tail docking of lambs shorter than the caudal fold.

§205.239 Livestock living conditions

Outdoor access would be a year-round requirement for all animals (poultry, above 50 degrees F.). Outdoor space would need to allow contact with soil. Yards or feedlots could be used in nongrazing season but would need to be large enough for no crowding and meeting outdoor space requirements. Temporary confinement would need to meet indoor space requirements. Bedding must be clean and dry.

Calves could be housed in individual pens until weaning as long as there was room enough to turn around and lie down and calves could see, smell and hear other calves on the farm. After weaning, calves would need to be group-housed during the non-grazing season and, if over 6 months old, would need access to the outdoors at all times and be on pasture during the grazing season.

Poultry would be required to have access to the outdoors with temperatures above 50 degrees. 2 square feet of outdoor space per bird would be required. Structures with floors and solid roofs overhead ("porches") would be considered indoor space, not outdoor space. Pullets would be provided with outdoor access at 12 weeks and broilers at 4 weeks if feathering and weather permits. Layers could be briefly confined for nest training. The recommended indoor space requirement per bird is 1.5 square feet for layers and 1 for broilers. Total door opening length required would be 5 feet per 1000 layers and doors would need to be at least 14" high.

Beef and dairy cattle under 220 pounds must have 15 square feet indoor bedded space and 10 square feet outdoor run/pen space per animal. Cattle 220-440 pounds need 15 square feet indoor and 20 square feet outdoors, while those 770-1100 pounds need 40 square feet indoors and 30 square feet outdoors. Cattle over 1100 pounds need 10 square feet indoors per 220 pounds and 8 square feet outdoors per 220 pounds. Space requirements for bison, sheep, goats, swine, and rabbits are also detailed.

§205.241 Humane handling, transport and slaughter: general conditions of animal welfare in handling and slaughter.

DO YOU HIRE TRUCKING FOR LIVESTOCK?

- The Livestock Committee is recommending that organic certification be required of those who transport livestock. Note: MOSA will be making comment to the effect that this should not be needed if both the producer and the handler take responsibility for humane handling during loading and unloading and the transport time is less than 12 hours.

- Calves should have a dry navel cord and be able to stand and walk without human assistance to be transported to slaughter or auction.

- Transport should provide season-appropriate ventilation, bedding (certified organic if consumable), and organic feed and water if transport time is over 12 hours.

- Slaughter plants would need to work with transporters so that waiting time on the shipping container is no more than an hour and there must be plans in place to ensure animal welfare in case of emergencies during transport.

- Non-slip flooring would be required for shipping containers and slaughter plants. Gates in the unloading area must swing freely and not have any parts that could injure animals. There must be enough lighting for animals to be easily observed. In all parts of the slaughter facility, animal slips and falls must be no more than 1% of animals being unloaded.

- Willful abuse of animals would be prohibited. There must be humane procedures in place for handling immobile and fatigued animals. Electric prods are only to be used to try to save downed animals and a maximum of 3 shocks given, never to sensitive parts of the animal.

- Only trained personnel should perform euthanasia and equipment for this must be stored and maintained properly with maintenance records.

- Slaughter plants would need to be audited yearly for animal welfare under this recommendation. Certifiers could review reports from animal welfare certification audits and do any needed additional auditing. Plants would also need to do self audits weekly. The annual audit would in-

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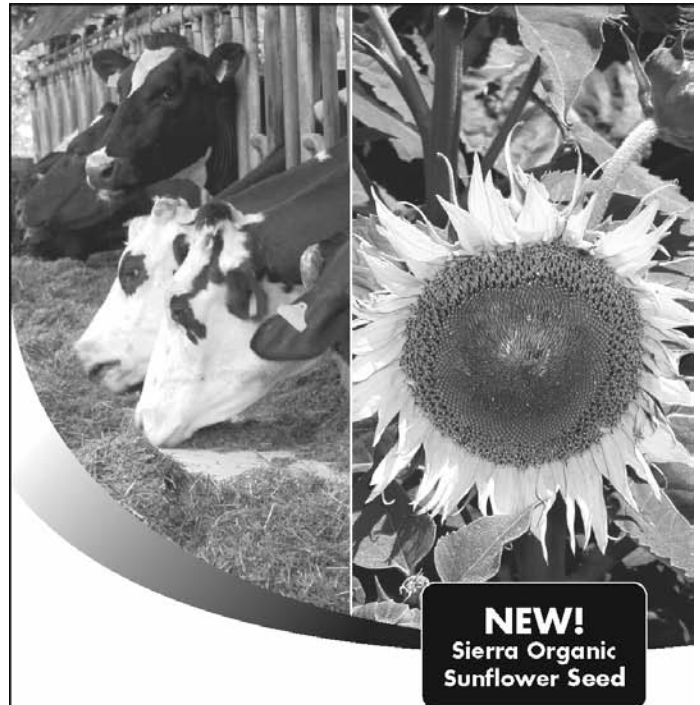
Animal Welfare

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clude specific criteria that must be met. These would include vocalization by no more than 3% of cattle in restrainers and stunning boxes and areas, 5% of hogs in restrainer, and 5% of any livestock when a head holder is used in stunning or slaughter. Conscious mammals could not be suspended by their limbs. No more than 1% of animals should slip or fall at the stun box or stunning area. 95% of cattle and sheep should be effectively stunned via captive bolt or gunshot, and 99% of electrodes should be placed correctly with electrical stunning. No more than 1% of hogs should vocalize due to hot wanding. If stunning via gas is done, animals should be able to lie down or stand without being on top of one another.

If you have comments on these proposed recommendations, please contact the MOSA office by April 22 and we will include them in the public comments we will make at the NOSB meeting.

Holly Born
Certification Specialist



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For Sale: Lg. rd bales net wrapped MOSA certified organic alfalfa/grass hay, stored indoors, 1st crop - \$40; 2nd crop - \$50; 3rd crop - \$60 per bale. Wonewoc, WI contact Tony: 608-477-0069

For Sale: Organic hay: 4x4, net-wrapped rds, dry or wrapped balage. Alfalfa or grass, \$70-\$180/ton. 1st-4th cuttings. Test results available. Rushford, MN 507-864-8080.

For Sale: MOSA certified 4X5 net wrapped 1st crop. 715-879-5572.

For Sale: Certified organic seedlings: tomatoes, peppers, onions, etc. Custom orders welcome. Also organic and untreated seed. D&S Organic Farm, 4738 Gates East Rd, Middlefield, OH, 44062. 440-693-4632.

For Sale: Widest independent selection of certified organic & non-GMO seeds & related products at lowest possible prices. All main 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: 1st and 2nd crop clover-alfalfa mix, 3 x 3 x 6 wrapped baleage. Also 3 x 3 x 7 dry, stored-inside corn fodder bales. In Boaz, WI, area. Delivery available. Call 538-3290 or 536-3573.

For Sale: 2000 bushel organic oats; 100 bales hay, 4 x 5 alfalfa net-wrapped - \$25/bale. 612-805-0111.

For Sale: Dairy quality balage. Alfalfa 4x4s, RFV 194, crude protein 25.4, certified organic. Rushford, MN jnerick@acegroup.cc or 507-864-8080.

For Sale: Hay, small squares of alfalfa/clover mix. MOSA-certified. 1st, 2nd, and 3rd crop - no rain. Rockland, WI, 608-486-8520 or cell phone, 507-450-3788.

For Sale: MOSA-certified organic alfalfa/grass mix, 50 bales 2nd crop, 800 lbs net-wrapped RFQ 144 \$1.00/point; 1st crop grass, 126 bales RFQ 93; 20 800-lb bales, roto-cut, net-wrapped \$80/ton. Ogema, WI, 715-767-5388.

For Sale: 80 4x5 net-wrapped round bales put up with no rain, good quality. \$60/bale. Pick up at farm or delivered. 608-632-1869.

For Sale: Certified organic wheat straw. Clean. Baled July 2010. Cherry county, Nebraska. 5 semi loads. Will be baling certified alfalfa this summer (2011). Contact Carl 402 389-1690.

For Sale: Organic alfalfa hay and oat straw. 2010 3rd crop large (seven foot) square bales, stored inside. 31 bales of hay; 47 bales of straw. Westby WI, we load you haul. Call Charley at 608 634 3860 or Tom at 608 634 2118.

For Sale: 2010 organic hay 3 x 3 x 8 bales. Stored inside on pallets. Tested 114:202 RFQ. AnaLab. Jerry Nuytten, MN. 507-829-5260.

For Sale: Certified organic alfalfa, large round bales, 120-162 RFU; \$1.00 / point of RFU Delivery available Waseca, Mn 507-521-5525

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

For Sale: MOSA-certified barerooted onion plants. Candy, Safrane, Mustang, Cortland, Redwing. Also Leeks. \$8 per hundred, \$40 per thousand. Large quantity discounts! For more information, write to Ammon Stoltzfus, W12200 Country Road C, Black River Falls, WI 54615.

For Sale: Certified organic small squares of hay, 2nd and 3rd crop. Nice quality. 75% alfalfa, 25% grass. 920-427-6663.

For Sale: Yetter 11 Shank Chisel Plow. Heavy Duty in good condition. \$1600 OBO; Hiniker 5000 6-row cultivator, in very good condition; Right hand (RH) 18' Miller Pro 2175 chopper box, with kory gear, seen very little use. \$2750; JD 7000 6-row narrow planter, dry fertilizer in very good condition. \$3900. 920-427-6663

For Sale: Organic large round bales, alfalfa-grass mix. Approximately 35 count, 1300 lb. average weight. \$70/bale. Delivery available at extra cost for mileage. (11 bales/lot capacity for delivery.) Rockland, WI. 608-498-6656.

For Sale: MOSA certified organic hay, 1st, 2nd, and 3rd cut. Dairy quality. Large square bales, stored inside. 6' x 5' round bales of 1st cut and new seeding hay. Contact Paul Proksch in Stoddard, WI. 608-457-2865 or 608-498-2882 (cell).

For Sale: **got organic milk?** need organic hay? 1st crop 4x5 round grass/alfalfa, 900# bales, stored inside. 44\$ a bale, delivery available up to 50 miles from Medford, WI. 715-748-6863 OR 715-965-1234

For Sale: Organic certified hay from Northeast Iowa. Round bales of dry hay and bedding for balage. Low potassium hay available. Feed tests made on all lots. Contact James at 563-586-2231.

For Sale: Organic alfalfa. 1st/2nd/3rd crops. Dairy hay, baleage, wrapped. 3 x 3 x 5 1/2 square bales. Larry, Coon Valley, Wisconsin. 608-452-3641

Wanted: Certified organic springing heifers due now through fall. Our farm is in south central Minnesota, but we don't mind traveling a ways for the right animals. Please call Kevin at 612-845-0124 any time.

For Sale: Small herd of 10 registered Ayreshires, various stages of lactation; also 1 registered bull from the 2009 Canadian (Ayreshire) Cow of the Year. Call Lee at 715-579-3308.

For Sale: Certified organic alfalfa hay. 1st cut. Test results available. Large rounds. Bill Bickel. Trail City, SD. 605-845-3045.

For Sale: Organic hay and baleage, no rain, various lots, tested, rounds: net wrapped and small squares. Delivery available. Call for info. 715-873-4111

MISCELLANEOUS

Wanted: Looking for 50 head certified organic cows and heifers: Holstein, Brown Swiss or cross. Need them no sooner than June 15. Call 218-770-1089.

Farm For Sale: 130 crop acres certified organic, two houses and other outbuildings. Owners need to retire. \$500,000. West Central Wisconsin. 800-657-4412.

For Rent or Sale: 100 acres, farmed organically since 1991. 715-644-0300.

For Sale: JD 230 28' Disc; Henke Roller mill w/ blower & elevator; Kovar 60' pine weeder; Manure spreader on Internat'l Tandem truck. Culver Farm. 715-568-3758

For Sale: 5 Surge One touch pulsators and control box. 5 Surge Orbit claws with shells jettors with buckets for automatic wash system. 608-435-6700 or e-mail: jdsml@centurytel.net

For Sale: Garlic Tincture: Approved for treatment of organic livestock, but not for routine use. Made with our own garlic. While supply lasts, 1 qt for \$70, 16 oz. for \$40, 8 oz for \$25. All prices are postage paid. The Garlic Garden, N83 Hall Dr., Stetsonville, WI 54480.

Farm For Sale: 23 ac. organic farmette. One mile east of Mt. Tabor. 3-BR ranch style house w/ att'd 2-car garage, 24x68 walk-in basement. 36x68 hiproof. 2-story barn w/ 12x36 lean-to. 40x60 insulated shed w/ in-floor heat. 24x30 1.5 story insulated shop. 12x28 shop. Barn, shed, basement, tenant house all less than 12 yrs. old. Priced to sell: \$125,000. Elmer Beechy, S1166 Co. WW, Elroy, WI 53929.

Wanted: Organic straw in summer of 2011. Growers in ND, MN, contact 563-543-4513.

For Sale: Falc rotovator model Kupa 4000 15' used on 400 acres. Like new \$25,000; 15' sidewinder rotovator \$8500.; 2 Lilliston 6-30 cultivators. One with row units \$4000. On without \$3000. Both have new spiders.; Kovar 30' Tineweeder new 2' tines. Hydraulic Fold. Baldwin WI 715-684-2488.

For Sale: Open pollinated seed corn. Wapsie Valley. 85day. MN 13. 88 day. "J" Reids 90 day. \$79.00 per 50#. Rich Holman. Baldwin, WI 715-684-2488

For Hire: Timber harvesting w/ horses. We can select harvest w/o excessive damage from heavy equipment. Central Wisconsin area. Send phone # for info. David Renno W4413 CR N, Owen, WI 54460

For Sale: 10+ acres available, most recently in hay or pasture. May now be all applied (or part desired) to organic cropping. Any balance would be pastured to remain organic. Fields were certified in the past, but not currently. Located just south of 121 off County G (Schermerhorn Valley). Call 715-984-2529 or email snugtherjoiner@trivest.net.

For Sale: Desert Dynamamin \$8/bag; pallet & a half. Bloomer, WI. 715-568-3758.

FREE: 2 Rochester Staves silos for taking down. 16' X 60' & 18' X 60' Call 715-452-5817.

Wanted: Horticulturist (or equivalent) partner(s) immediately, to relocate to peaceful 6-acres in West Bend, WI. Requires passion for raising/selling nourishing vegetables; long-term commitment w/ clear priorities; innovation. Ideal person knows seed propagation & saving, biointensive methods, solar drying, soil & crop health, season extensions, storage crops. On/off-premise sales, set up; potential deliveries; involving children in gardening while caring for them. Apt, deer fencing, trellising, rain barrels galore, pond & more. Yearly donations requested for crop expenses & taxes. Grow & profit. Incoming phone calls only between 7 a.m. to 8 a.m., or 7 p.m. to 8 p.m., M-F, 262-675-0190. Please do not leave a message. SORRY no e-mail.

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FAREWELL AND BEST WISHES

By **Bonnie Wideman, Executive Director**

Joe Klein won't be on the road inspecting for MOSA this summer—a disappointment for MOSA and the farmers who have had him as their inspector—but we wish him well in his new career as an organic milk field man and express appreciation for over 600 inspections Joe has done on MOSA farms in the past 5 years.

I first met Joe when my husband Jeff and I did his farm inspection back in 2002 when he was still milking cows. When I heard he had retired from milking and was interested in doing organic inspections, I was very excited about his potential as a MOSA staff inspector and we “snatched him up,” for the finest attribute a farm inspector can have is to know farming. If an inspector has farm experience, he knows what to look for when inspecting someone else's farm, and he knows how to find a proper and practical perspective on the standards and how they play out in real life on the farm. Joe exemplified this in his years with MOSA.

I appreciate the work Joe has done and though he'll be hard

to replace we look forward to working with him in a new relationship within the organic industry. I've always enjoyed Joe's “end-of-season” reflections that he shared through this newsletter, and in the last one Joe mentioned losing his father in 2010. He shared his father's philosophy, which I believe I can say is Joe's, also: “Live like today's your last day, but farm like you're farming forever.” A lot to think about in those words... Thank you, Joe Klein.



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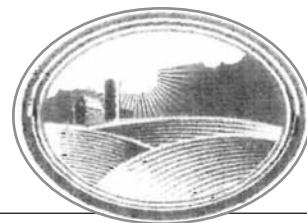
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Pasture Rule

Continued from page 1

- Grazing infrastructure is newly set up but animals don't know how to graze yet;
- Lack of time and money for additional fencing;
- Farm or pasture is landlocked;
- Overgrazed pasture;
- Organic bedding requirement;
- Increased record-keeping

There is a common misunderstanding about the minimum grazing season. Dairy animals need to receive 30% DMI from pasture for the grazing season of their particular location. This means Southern Ohio has a minimum requirement of 150-180 days while Northern Minnesota has a minimum requirement of 120 days.

Understanding grazing season

- Grazing season is not growing season
- May range from 120 days to 365 days, but not less than 120 days per year.
- We verify that producers are grazing for the grazing season of their areas.

How MOSA evaluates grazing season

We have consulted grazing specialists with the Natural Resources Conservation Services for all the areas in which MOSA certifies. They have given us approximate grazing season days for each particular region. Producers will need to meet the 30% minimum for the grazing season of their geographical area.

Walking the line of 30%

For producers on the 30% line, either a little over or a little under, here are some ideas for compliance :

- Extend the grazing season. For spring, winter rye (planted in the fall) makes good quick growth and can provide some early spring grazing. To offset the "summer slump," folks can plant summer annuals like Japanese millet or sorghum sudan to keep pasture DMI up during this time. In the fall, there is the option of grazing hayfields or even cornstalks if other pastures have faded out.
- Graze rotationally. This ensures good, quality pasture and gets more productivity from pastures.
- Add more pasture or reduce animal numbers. Not always a good option, but by doing either one of these things, you can help yourself get above the 30% DMI requirement.

The beef rule change

Ruminant slaughter stock must be maintained on pasture for

each day that the finishing period corresponds with the grazing season for that geographical location. However, the pasture rule exempts ruminant slaughter stock from the "30 % DMI from grazing" requirement during the finishing period. We interpret the finishing period timeframe requirements to be when finishing corresponds with the grazing season. The finishing period shall not exceed one-fifth (1/5) of the animal's total life or 120 days, whichever is shorter. The NOP has yet to publish a response to comments they received on this issue.

Assessing compliance in 2011

Initial Review. During initial review, we will reassess whether or not the pasture portion of the Organic System Plan is compliant with the new pasture rule. In order for the file to move to inspection, there will have to be an acceptable pasture plan in place.

Annual Inspection. Inspectors will make detailed observations of pasture quality and quantity and assess whether pasture can provide the amounts stated in the rations.

Monitoring. Drive-by, unannounced inspections will be made to verify ruminants are on pasture.

Final Review. During final review, we will reassess pasture compliance and the effectiveness of the current management practices. We will issue non-compliances. Compliance will be evaluated from looking at overall pasture management, ration information, and inspectors' observations of animals and pasture.

Additional Tools. We're developing new forms to address the fact that rations change throughout the year. These forms will help farmers record ration changes and give weighted averages for amount of pasture ruminants are receiving over the grazing season.

What happens to a class (or group) of animals if, at the end of the grazing season, that class (or group) of animals fails to meet the 30% DMI from grazing requirement?

The NOP's response is very clear: "The rule states that each type and class of animal must have an average of not less than 30% DMI from grazing throughout the grazing season. In cases where part of an operation (e.g. a particular class or group of animals) fails to meet the 30% DMI from grazing requirement at the end of the grazing season, the certifying agent would issue a combined noncompliance and proposed suspension for that portion of the operation. The producer would lose his/her certification for this portion of his/her farm."

While practicality in decision-making will still come into play, the NOP has made it clear that farms must be able to comply in all areas.

NOSB

Continued from page 7

meeting. After reviewing the original intent of the addendum, the Materials Committee is recommending that the NOSB rescind the April 2010 recommendation. The Committee believes a guidance document can show that chemical changes generated during allowed processing methods do not result in a material being classified as synthetic.

A key topic left unresolved in the April 2010 Draft Guidance Document was the question, *"What is a significant amount/level of a synthetic input to the process remaining in the final material?"* The Materials Committee evaluated two different approaches. One approach considers that *any* known level of a synthetic substance in the final material or in the environment, as a result of the substance's manufacture, use and disposal, is significant. Proponents believe this approach requires determining whether there is harm associated with the use of the synthetic substance, which therefore would be subject to the National List review process. The second approach ultimately received the support of the majority of the Materials Committee. That approach says a significant level of a synthetic substance in the final material means (1) a level exceeding any applicable regulatory limits, where in effect, for the material being classified, and (2) a level without any technical and functional effects in the final material. Proponents of this approach believe this is more consistent with past NOSB practice and precedent, is consistent with the recommendation of the Materials Working Group and reflects the bulk of the public comment received. Additionally, the majority of the Materials Committee was concerned with using an approach of "any known level," since technology allows the detection of ever decreasing amounts of material, which could force changes in allowances.

Material Review Organizations

The Compliance, Accreditation, and Certification Committee (CACC) will present a discussion document on the evaluation of material review organizations, such as the Organic Materials Review Institute or the Washington State Department of Agriculture.

The CACC says there's a clear need for more uniform and consistent policies governing material review services, and believes all organic stakeholders would benefit from a clearly defined NOP guidance around the qualification and activities of these organizations. Challenges identified include: lack of transparency of what materials have been approved for use in organic production and handling; lack of consistency in materials approved; situations where the NOP has disallowed the continued use of materials but material review

organizations continue to list these materials as allowed; the unavailability of a universal list of approved substances; inconsistency in processes for removing substances from OMRI and WSDA lists; and the lack of NOP direct regulatory authority over material manufacturers. The Committee has identified a number of potential models and relevant questions on this issue and seeks public comment from any stakeholders.

Corn Steep Liquor

A couple of NOSB Crops Committee recommendations may have implications for handlers. At the last NOSB meeting, Corn Steep Liquor (CSL) was a hot topic. This material's classification can set precedent for future review of other materials. CSL, used for many years as an input mostly in liquid fertilizers for organic crop production, is a by-product from the corn wet-milling process. It has been considered non-synthetic in the past by certifiers and OMRI. However, OMRI recently reevaluated CSL and concluded it should be classified as synthetic based on the use of sulfur dioxide during processing. In April 2010 the NOP requested that the NOSB review CSL's classification. Last fall, the Crops Committee voted to classify CSL as synthetic based primarily on findings which stated that the major objectives for corn steeping are to induce chemical and physical changes in the kernel by leaching the soluble components from the corn.

Following the autumn 2010 NOSB meeting and a full Board discussion of the information and input from the general public, the Crops Committee now has voted 4-3 to classify CSL as nonsynthetic. The Committee majority determined that sulfur dioxide's use is to block fermentation, and does not change the identity of CSL. The majority considered that agricultural by-products, food waste and products from food waste processing should not be considered a synthetic ingredient for the purposes of organic crop production or the making of compost.

However, a strong minority opinion says determining whether CSL is synthetic or non-synthetic is a foundational issue in the determination of allowable inputs in organic production. The determination itself of whether an input is synthetic doesn't always determine whether that input is allowable in organic. It simply ensures that the NOSB carries out its responsibility to review and evaluate whether use of that synthetic material meets the law's standards of sustainability. The minority's position is that CSL must be defined as a synthetic product because the process requires adding a synthetic chemical to an otherwise natural steeping/lactic acid fermentation process to effect a chemical change, necessary for the end product to be created.

Chilean/sodium nitrate and Canadian Equivalence

The Crops Committee has responded to the NOP's September 2010 Action Memo on one of the Sunset 2012 materials, sodium nitrate, as it concerns the organic equivalency arrangement between the U.S. and Canada. MOSA-certified handlers will recognize this issue since we recently sent compliance affidavits for them to give to their suppliers to verify compliance with Canadian equivalence requirements.

Crop products for export to Canada may not use sodium nitrate (Chilean nitrate) in production, and this restriction extends to processed crop products. However, long supply chains make it difficult to track whether or not the material had been used in production of crops supplied to processors; and producers and processors may not be aware that their products may end up being exported further on in the stream of commerce. The NOP tolerance for some Chilean nitrate use is a barrier to trade.

The Crops Committee's response to the NOP notes that there are no existing NOSB policies or precedents for changing annotations or prohibiting a material without a petition from the organic community and notes that equivalency agreements or ease of trade were not included among the NOSB's review criteria. The Committee says that all work should be done within the established process, with full input from the public considered. Since sodium nitrate was already being considered as part of the 2012 sunset process, the Committee decided to deal with this issue within that context.

Based on the controversial nature of sodium nitrate and the lack of international unity of standards regarding this material, the Crops Committee deferred the sunset deliberations and vote pending more up to date technical information and allowance for additional public comment.

Sodium nitrate is highly soluble, and it tends to be used in support of crop production in cool conditions and in crops needing a quick boost of nitrogen. It is used alone and also in commercial fertilizer product formulations. It leaches into groundwater, is regulated as a contaminant, and has contributed to decreased earthworm populations. Use and dependence on sodium nitrate also can encourage producers to put off strong soil-building practices, since it behaves similarly to conventional synthetic nitrogen fertilizers. Alternatives in the form of agricultural by-products and food processing derivatives are in far greater supply than when sodium nitrate was first placed on the National List, and are in forms more comparable and effective to use than in years past. Public comment has been mixed, and more is anticipated at the April meeting, but there was consensus among the Committee that there is significant industry support to remove the existing restricted allowance for sodium nitrate use.

Livestock Handling

The Livestock Committee will present two animal welfare recommendations regarding stocking rates and animal handling, transit, and slaughter. These issues are discussed elsewhere [PAGE #?] in this issue of *The Organic Cultivator*. MOSA-certified slaughter facility operators should review these recommendations and consider submitting comments. The Livestock Committee will also present a discussion document on omnivorous diets for poultry.

Make Your Comment

If you have comments on these proposed recommendations, see below for detailed instructions. Otherwise, please contact the MOSA office by April 22 and we will include your views in the public comments we will make at the NOSB meeting.

The complete draft of recommendations is available to view at <http://www.ams.usda.gov/NOSBCommitteeRecommendations>, organized according to their respective NOSB committees. Individuals can submit comments on individual recommendations either electronically or in-person at the Seattle meeting. Comments can be submitted in written or audiovisual form at <http://www.ams.usda.gov/nosbseattle> until April 10. Comments should specify the recommendations being referenced.

Additionally, the NOSB meeting provides a public forum to discuss the organic regulations and provide recommendations. Individuals may pre-register for a 5-minute public comment slot by Sunday, April 10, by visiting <http://www.ams.usda.gov/nosbseattleslots> or by calling (202) 720-3252.

Stephen Walker Processing Certification & Compliance Manager



Photographs in this issue provided by Steve Walker.



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