

Organic Matters

QUARTERLY NEWSLETTER • FALL 2020



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of a Crop
Rotation Plan

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the Face of
Climate Change

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Organically Speaking

Dear PCO Community,

While this is my favorite time of year, 2020 continues to defy any normal and is forcing us all to be flexible and more patient. At PCO, our staff is working even harder to provide dependable customer service to our clients while we also undertake some big initiatives in the coming months.

Though we continue to work remotely, we are keeping you all top of mind by: communicating changes as clearly and quickly as we can, utilizing lots of new tools and software to a much greater capacity, and planning ahead to bring you information in new ways. We have a substantial percentage of clients that receive information by phone or postal mail only, and we are doing our best to make sure we get the same communications to those clients as quickly as we can too. We ask for your attentiveness and patience in taking the time to read these extra communications thoroughly, as we all continue to navigate big change on a number of levels.

1. Clients, inspectors, and staff might all be juggling shifting family priorities due to COVID-19 protocols during the busy inspection season. We ask that everyone work together during this time, keeping in mind PCO's first core value:

We keep people at the center of every action, interaction, and decision. We do this by:

- *Caring intensely about our stakeholders and their ability to succeed.*
- *Showing deep respect for human beings inside and outside our company and for the communities in which they live.*
- *Listening well and seeking to understand before reacting.*
- *Being empowered to provide proactive solutions.*
- *Communicating in a clear and timely manner.*

2. Another new initiative for staff is implementation of a new software platform that is scheduled to go 'live' in early Spring 2021. Instituting the use of this software will help staff with streamlining certification services, creating operational efficiencies, and giving clients greater access to their information. Other certifying agencies utilize this software too, so updates

that meet changes affecting us industrywide will happen more readily. This will make it easier to align our processes with industry standards and will save on administrative work, allowing staff to provide more attentive customer service. See page 13 for more details.

Your feedback is very important to us, but we can't solve your problem if you don't communicate it to us in an actionable way.

Please do not hesitate to continue to reach out to our staff by phone with questions or concerns that need urgent attention. Access to staff, transparency, and accountability are big cultural priorities for PCO, and they are major keys to living that first core value. If you haven't reviewed it attentively lately, I encourage you to take a look at our Code of Conduct, on page 21 of this issue or available on our website at paorganic.org/about/mission-vision-and-core-values/standards-of-conduct/ or in paper upon request. You will also have the opportunity to provide feedback via our year-end customer service survey.

Stay tuned in the coming weeks for more information about program, outreach, and marketing changes, as our staff finds new ways to compensate for the cancellation of in-person meetings and conferences this fall, and likely into 2021. Meeting you as soon as possible is a priority for me, but this will likely happen via webinar, phone, or video before it happens in-person. Please do not hesitate to reach out to me directly with any immediate concerns.

With appreciation for the important work you do for people and the planet,

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VISION

All communities are enriched through organic food and farming

MISSION

To ensure the integrity of organic products and serve our farming community

CORE VALUES

- 1. People & Service** – Keep people at the center of every action, interaction, and decision
- 2. Organic Spirit & Environment** – Promote restorative practices that improve the world for future generations
- 3. Honesty & Integrity** – Embrace transparency and integrity in all our work.

Organic Matters

FALL 2020



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Cover photo: Gita Nagari Farm

Cover Crops Are the Keystone of a Productive Crop Rotation Plan

Flexible and creative use of cover crops allow farms to adapt to unpredictable conditions while building healthy soils and using compliant practices

Cover crop cocktail planted next to a tilled field.

JUSTINE COOK, CERTIFICATION PROGRAM ASSISTANT MANAGER

Though cover crops are only mentioned twice in Subpart C of the regulations, the functions they can perform are threaded throughout organic production requirements on maintaining or improving soil quality, managing pests and weeds, and the very definition of organic production, which specifies production practices that “foster cycling of resources, promote ecological balance, and conserve biodiversity.” When a certifier is provided a crop rotation plan that does not include the use of cover crops, it immediately introduces questions on compliance and the ability to comply with several requirements.

- How will that rotation protect soil over winter, when it is vulnerable to raindrop impact, sheet flow erosion and wind?
- How are nutrients that mineralize from organic matter in warm fallow months being managed – are they washing down the soil profile into groundwater?
- What organic materials are being added back to the soil, to compensate for loss due to tillage and harvestable plants?

While some of these questions can be well met with a mix of alternative solutions, they all can be addressed directly with the addition of a cover crop to the rotation. However, unfavorable weather, harvest delays, and equipment malfunctions can upset the best laid plans for cover crops on any farm, at any time. The challenges these variables can present in the successful establishment and use of a planned cover crop may discourage the use of any cover crop that year or cropping cycle. There are several

resources and experts that offer additional options beyond a fall-seeded annual and allow farmers to respond to the real time conditions and maintain compliance with National Organic Program (NOP) regulations on crop rotations, natural resource management, and soil fertility.

There is no prescriptive crop rotation that must be followed in organic regulations; operators and certifiers are expected to evaluate site-specific conditions and the farm’s characteristics to determine whether the crop rotation followed fulfills the definition and required functions of crop rotation as per the regulations. What works on one farm, may not work on another – and that may be due to differences ranging in soil characteristics, micro-climates, or equipment availability. A farm with ruminant livestock and a perennial hay crop has different needs and a different production schedule compared to a CSA that deals exclusively in annual vegetables or a Pick-Your-Own orchard – the crops grown and when those crops are grown can vary greatly, however the functions their respective crop rotations provide must be the same. When reviewing a crop rotation for compliance, certifiers are looking to determine whether it fulfills the following criteria:

- Maintains or improves soil organic matter;
- Assists with the management of pests in annual and perennial crops;
- Manages deficient or excess plant nutrients; and
- Provides erosion control.

In addition, according to organic regulations, crop rotations cannot include the same plant species or family grown repeatedly without interruption on the same field. Cover crops are considered a crop in the definitions of NOP regulations, and for a cover crop to be successful, it takes much of the same investment as your cash crop. No one is looking

to waste their time or money on a crop failure for the sake of noting that the seed was put into the ground. So what happens when you are planning to use cover crops to fulfill several of those functions and you encounter an issue that means almost certain crop failure?

There are several sources of information on cover crops and fitting them into a crop rotation. Like a cash crop, cover crop seed needs a properly prepared seed bed, the right climate conditions, and quality seed. Unlike most cash crops, which are driven by your market demands or livestock needs, you can be creative or pivot if the conditions you are presented with are not conducive to the crop you were planning to grow. The idea of quickly purchasing large amounts of different cover crop seeds is not feasible for the majority of businesses, however through discussions with experts, use of research, and experimentation on your own farm, it may be possible to develop a response plan for patterns or conditions that you've noticed with increasing frequency, whether that's encountering wet conditions more often or experiencing drought more frequently. By testing small plots on your farm, or using reliable reference materials, you can find cover crops that are more resilient when grown in less than ideal circumstances or have greater tolerance for conditions that you are often experiencing on your farm. Conversely, if you are observing a pattern of late corn harvest or dry conditions in the fall for several years, but decide to stick to the plan that is contingent on adequate soil moisture or a strict harvest deadline – a plan that is not feasible would not be considered a compliant plan.

Grasses and legumes, seed size, growth habit, biomass produced – there is a large variation in options for cover crops. As farm plans develop and farms respond to new or changing markets, there may be a need to investigate these variations. Pioneers in cover cropping techniques experiment with cover crop cocktails that buffer any potential failing in one variety with three or four other varieties that can do the heavy lifting. For late fall harvests, some operations experiment with interseeding clovers prior to harvest or leaving corn fodder to protect the soil and frost seeding just after snowmelt. Depending on the rotation and soil conditions, a fast biomass spring crop, such as peas and oats or yellow mustard could provide benefits for nutrient cycling, biodiversity, and breaking pest cycles. A summer cover crop, or a relay crop, is a warm season cover crop that is planted in place of a fallow period or to precede a fall-planted crop; the crop is generally planted in the late spring or early summer and either terminated in the fall or allowed to winter kill. Some examples of summer cover include buckwheat, cowpeas, field peas, oats, sorghum sudangrass and sunn hemp. Having several options in mind and familiarity with the crops' requirements allows you to be prepared.

When making any changes to your organic system plan, be sure it is communicated appropriately to your certifier. NOP regulations note that operations must notify their certifier immediately of any change that may affect compliance with the regulations (e.g. adding new land, sourcing a custom mineral, building a new greenhouse or other type of



Root nodules formed on Cowpea cover crop.

facility, etc.) and this would likely include removing a cover crop from your rotation or failing to plant a planned cover crop, depending on the functions that the crop provided specifically. If you are replacing a cover crop in your rotation, whether it affects compliance depends on if the same functions are being fulfilled by the new crop, including coverage of soil during vulnerable periods. It would also depend on any change that the new crop may have on your seed buying practices – organic regulations require certified organic seed to be used unless it is not commercially available. The commercial availability clause includes equivalent varieties in an appropriate form, quality, or quantity to fulfill an essential function in production. If you are purchasing non-organic seed for the first time, you must verify that you understand and are following compliant practices for documenting your search for an equivalent variety and the number of seed sources that you consult. In addition, when purchasing a new type of seed, especially if it is not organic, be sure the documentation collected include sufficient information to show whether the seed has been treated or coated with any substances (including inoculants) and, as applicable, that the seed is not genetically modified.

There are several excellent resources on evaluating the performance and functionality of cover crops. Sustainable Agricultural Research and Education (SARE) publishes

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Building Resiliency in the Face of Climate Change

Utilizing organic systems for climate mitigation and carbon sequestration

VICKI LOWELL, COMMUNICATIONS MANAGER,
ORGANIC FARMING RESEARCH FOUNDATION

Climate change threatens agriculture and food security across the U.S. and around the world. Rising temperatures have already intensified droughts, heat waves, and storms, and altered life cycles and geographical ranges of pests, weeds, and pathogens—making it harder to grow crops and raise livestock.

Flooding left farm fields in the Midwest under water last spring. In the West, farmers and ranchers continue to deal with record-breaking wildfires intensified by increasingly warm and dry weather. At the same time, growers across the Southeast are battling devastating hurricanes and tropical storms.

Increasing in frequency, these intense rainstorms aggravate soil erosion and complicate water management, while higher temperatures accelerate the oxidation of soil organic matter. Warming climates affect crop development regulated by growing degree-days or “chill hours,” and threaten production of perennial fruit and nut crops that have strict chilling requirements to initiate growth and fruit set.

The good news is that organic systems that emphasize soil health not only protect soil life from the potentially adverse effects of synthetic pesticides, herbicides, and fertilizers, they also help increase resilience to the impacts of climate change. There is extensive research demonstrating the potential of organic systems to reduce agriculture’s contribution to climate change (i.e., mitigate climate change).

THE ROLE OF SOIL HEALTH

Research validates the four principles of soil health put forward by the National Resources Conservation Services (NRCS) — *keep soil covered, maintain living roots, enhance biodiversity, and minimize disturbance*—as guidelines for maximizing carbon sequestration in the form of soil organic carbon (SOC).

Soil is the foundation for plant life and is the farmer’s most precious natural resource. Keeping the soil covered reduces the chances that top soil will be lost to wind or



OFRF Executive Director Brise Tencer appearing before the Subcommittee on Biotechnology, Horticulture, and Research of the House Committee on Agriculture to discuss issues of resiliency and risk in agriculture. Photo: OFRF

water erosion. Planting cover crops and keeping plant residues in the field are good methods for protecting soil.

Plant roots not only help to hold soil in place, they also provide food and habitat for beneficial soil life. These roots also help trap carbon deep in the soil, making it harder for it to re-enter the atmosphere. In annual crops like tomatoes or corn, planting cover crops after the growing season is an effective method for making sure roots are present throughout the year and that soil life doesn’t go hungry.

Maintaining biodiversity in organic systems is key to controlling pests and diseases, as well as maintaining soil health. For example, the roots of different crop species provide food for different kinds of beneficial soil microorganisms. Farmers can enhance biodiversity in a number of ways, such as growing different crop species together in a field (intercropping) or by planting different crop species after one another (crop rotations).

Minimizing soil disturbance not only helps keep carbon and other greenhouse gases trapped in the ground, it also protects beneficial soil life that helps make nutrients available to crops. Farmers can minimize soil disturbance by practicing reduced and/or conservation tillage, which limits the frequency and intensity with which farmers turn over the soil.

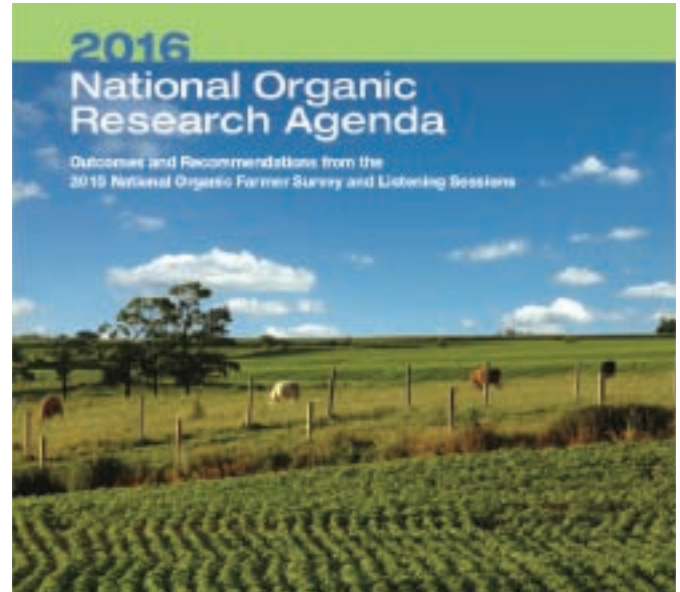
THE NEED FOR INCREASED INVESTMENT IN ORGANIC RESEARCH

While there is a growing body of research on organic agricultural practices that mitigate climate change and enhance farm resilience, we need to increase outreach and dissemination of these best practices to organic producers, and increase our investment in research and federal policies that address the socio-economic and logistical barriers to scaling organic production in the U.S.

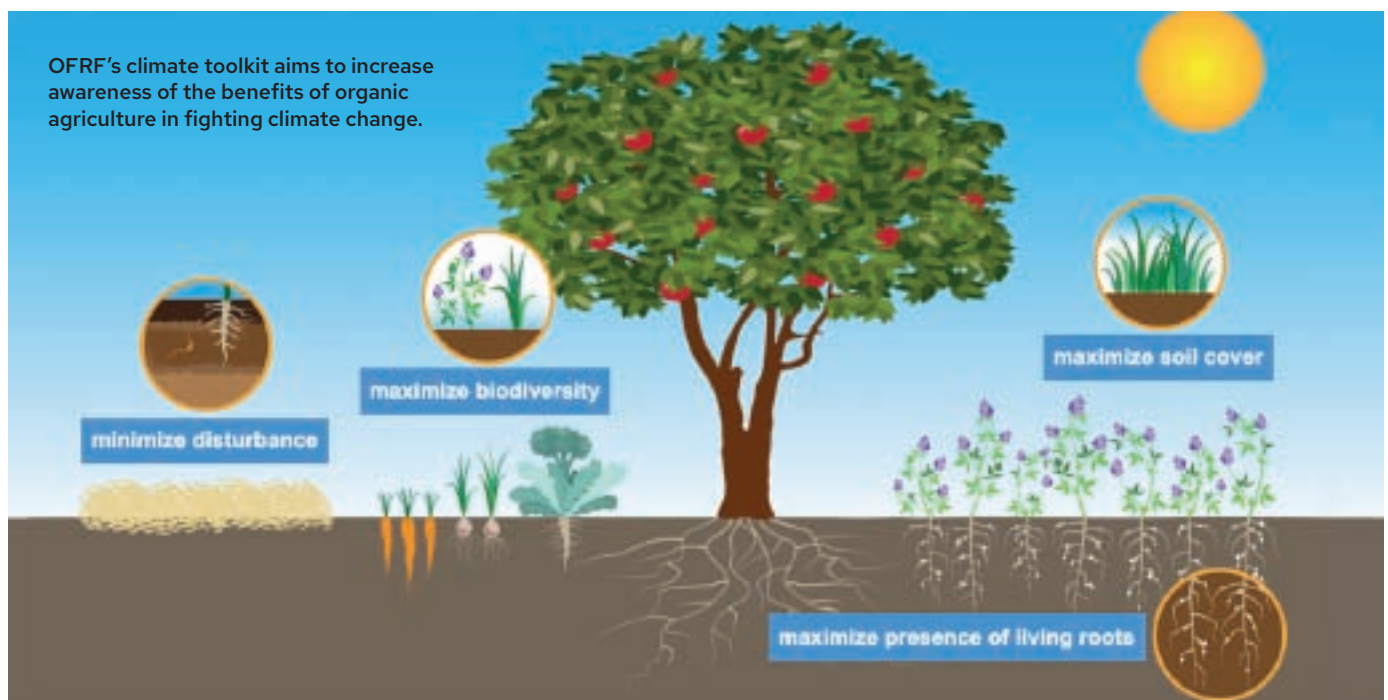
In 2018, Organic Farming Research Foundation (OFRF) released the eighth guidebook in its Soil Health and Organic Farming Series. *Organic Practices for Climate Mitigation, Adaptation, and Carbon Sequestration* examines research related to the capacity of sustainable organic systems and practices to sequester soil carbon and minimize nitrous oxide and methane emissions. The guide includes practical advice for reducing an organic farm's "carbon footprint" and adapting to climate disruptions already underway. Top takeaways from the guide include the following:

- While estimates on the ability of organic systems to offset greenhouse gas (GHG) emissions vary greatly, our review of the literature indicates that widespread implementation has the potential to offset approximately 25% of human-caused greenhouse gas emissions.
- *Sustainable organic agriculture* avoids *chemical* disturbance by excluding the use of synthetic chemicals, and allows some *physical* disturbance (tillage) when needed. *Conservation agriculture* aims to eliminate tillage while allowing some chemical disturbance (some use of synthetics as needed). Both systems build soil organic carbon (SOC), and the organic approach protects soil life from adverse effects of synthetics.

- The largest *direct* agricultural greenhouse gas (GHG) emissions include the powerful greenhouse gases nitrous oxide (N_2O), emitted from nitrogen-fertilized soil and manure; and methane (CH_4), emitted by livestock, manure, and rice paddies. Organic systems that optimize nutrient and manure management can significantly reduce these emissions.
- The real value of organic systems in mitigating climate change comes from adopting agroecological and sustainable crop intensification practices, such as tight crop rotations, cover cropping, intercropping and living mulches, *continued on page 28*



Soil Biology Guide – OFRF's *Organic Farming and Soil Health* series explores the most recent research on soil health practices, while offering practical guidelines for building healthy soil.



A Proactive Approach to Compliance for Crop Farms

Rodale discusses common compliance issues on crop farms and how to address them

Photo: Rodale Institute

EMILY NEWMAN, ORGANIC CROP CONSULTANT,
RODALE INSTITUTE

Regardless of whether you are employing traditional farming practices handed down through generations or using cutting-edge technology and methods, you may encounter compliance issues in the process of organic certification if you don't understand the basic requirements of the regulations and how compliance works. In addition to the practices you use, an important part of certification is understanding the framework and administration of the regulations. Electing to participate in the organic certification process means you are signing up for a third-party verification system; you are being evaluated for compliance with a national standard (National Organic Program, NOP, regulations) by an accredited certifier (e.g. PCO). Rodale Institute offers organic farm consulting to support the efforts of farmers who are interested in getting certified. Rodale Institute partnered with EcoCert to present an educational webinar entitled "Common Organic Crop Noncompliances and How to Avoid Them" to highlight regulatory requirements and practical tips for staying in compliance.

COMPLIANCE PROCESS

Noncompliances are notifications that the certifier has found a practice on your operation that is not in alignment with the requirements of the National Organic Program regulations. It's important that the operator understand and be familiar with the regulations and what they require prior to applying for certification. In addition to the legal language of the Code of Federal Regulations, there are guidance documents and forms that can assist the organic operation in providing the needed information and making sure their practices are clear. For example, PCO offers a

guidance document entitled "Seeds, Planting Stock and Seedlings Under the USDA Regulations" that clarifies the regulations and provides a list of related resources and organic seed suppliers.

Noncompliances are often identified at an inspection, during an annual review of your Organic System Plan, or perhaps during a call when you notify your certifier of unintentional issues that occurred on your operation. Remember: noncompliances are correctable. If you receive a letter from your certifier, do not ignore it! See page 19 for detailed information on noncompliances.

BUFFERS

The regulations for managing the borders and boundaries of organic land are important for preserving the integrity of organic products, but are also not prescriptive; it's vital for organic operators to have a clear understanding of what they require. 205.202(c) states, organic land must "have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management." As you may be aware, the regulations do not state that buffer areas need to be 10 feet, 20 feet, 50 feet or any clear guidance for that matter, but as a farmer it is your job to reduce potential risks that could contaminate your soil and crops. So how do you develop a compliant buffer zone?

The first step is to identify the risk. Do you have a neighbor who sprays prohibited herbicides or pesticides? Does your neighbor plant GMO crops that could lead to cross pollination on your operation? If the answer to any of these questions is, "yes," then you will need to implement practices that reduce the risk. If the answer to these questions

LEFT: At Rodale Institute, vetch is planted in the Fall after soybeans, then is rolled down in late Spring before planting corn. This crop rotation fixes nitrogen from the vetch cover crop and provides a mat of green cover that prevents weed pressure.

is, “no,” then it is likely you are surrounded by tree lines or other organic farmers and the adjoining land is low risk.

If there is high risk, it is important to identify the mode of transportation that the prohibited materials could enter your farm. Is the contaminant applied through a boom sprayer (high risk) or a backpack sprayer (low risk)? Do the prevailing winds blow from the conventional farm to your organic farm? Are there any farm lanes separating the conventional land and your farm? The answers to these questions will help you identify the appropriate size and type of buffer zone, and monitoring plan, that you need to prevent contamination. The higher the risk, the more robust the adjoining land use plan must be.

ORGANIC SEEDS, SEEDLINGS AND PLANTING STOCK

The regulations read, in summary, that seeds and planting stock are required to be certified organic unless they are not commercially available in that form. Seedlings, on the other hand, are required to be certified organic, with only a temporary variance from NOP allowing an exception.

First, let’s talk about the “organic seed search.” As an organic farmer, you are required to do your due diligence to source organic seed. The best practices for supporting organic seed purchasing are to find tried-and-true sources of organic seed. If, year-after-year, you ask your local seed dealer if they are sourcing an organic corn variety and every year they tell you, “no,” this is NOT a tried-and-true source. Find at least three companies who source a diverse variety of organic seeds suited for your climate and growing needs. Additionally, you can find organic seed using online resources:

- www.organicseedfinder.org
- www.seedalliance.org
- www.pickacarrot.com

That being said, if those three companies still don’t carry the form, quantity or quality, which are collectively known as commercial availability, you may purchase non-GMO seeds that have not been treated with a prohibited material. Be sure to keep sufficient documentation of all seed purchases (e.g. invoices, seed tags, etc.), as well as documentation of the “seed search” if you need to purchase non-organic seeds.

Due to the strict requirements for organic seedlings, sometimes vegetable and flower farmers need to get creative to produce the amount and

variety of organic seedlings to meet production requirements. Rodale suggestions:

- Propagating your own seedlings.
- Purchasing organic seedlings from a certified organic greenhouse. You can find certified organic seedlings on via a search on the Organic INTEGRITY database.
- Working out a custom growing arrangement with a certified organic greenhouse. You provide the organic seed and they grow the organic seedling for you! Inquire at a local organic greenhouse.

CROP ROTATION

Does anyone else have a favorite organic regulation? No? Just me? Well, if I had to choose, it would be 205.205 Crop Rotation Practice Standard. This regulation very clearly outlines the importance of a good crop rotation. Rotating crop families and using sod, cover crops, and green manures will increase soil organic management, reduce pest, disease and weed pressure, provide erosion control and increase nutrient availability.

As the weather becomes more and more variable, flexibility will be an important part of crop rotation planning. For example, a corn after corn rotation that relies on winter cover crops to provide most of the crop rotation functions can pose a risk in variable weather conditions. If a farmer plans to grow corn in 2019, but then the fall is incredibly wet, two things occur – the farmer isn’t able to get the corn harvested and the farmer is also unable to plant an intervening cover crop. If they are relying on the corn crop as the main cash crop or to feed to their animals, they are likely going to want to try planting corn in 2020 again. If you cannot show that your crop rotation meets the requirements of protecting soil from erosion, cycling nutrients, and interrupting plant families – it is not compliant.

Another common issue, especially in produce operations, is planting crops within the same family without interrupting

continued next page



It is important to be diligent about contamination from neighboring fields during harvest time. If there is risk of cross pollination or spray drift, harvest a buffer area that will be sold as conventional. Additionally, be sure harvest equipment is clean and free from contaminants prior to entering the field. Photo: Rodale Institute



continued from previous page

tion. If you follow spring onions with a planting of fall garlic, you are planting two allium crops that share several pests and diseases. This issue could be avoided by spatially separating the crop growing locations or separating them with an intervening crop. Again, a noncompliant crop rotation may cost you more time and money because of the need to employ additional pesticides or fertilizers.

When it comes to building a compliant crop rotation, here are some steps you can follow:

- Write down your goals. Are you trying to maximize profit? Maximize diversity?
- Draw or a map or utilize an online web services (Google Maps, Web Soil Survey) that includes acreage. This step will help you understand how many tillable acres you are working with, including high tunnels.
- List out the crops you plan to grow and include timing of planting and harvest, utilizing weeks of the year.
- Don't forget to include cover crops and fallow periods.
- Project ahead at least three years.
- Be flexible and willing to adjust!

COMMINGLING AND CONTAMINATION

To prevent commingling and contamination per the regulation at 205.272, on your farm, you should focus on areas pertaining to production, processing, transportation, storage or handling. All non-organic and organic products should be physically separated and identifiable in storage areas, barns, and refrigeration. This also includes physically segregating prohibited herbicides, pesticides, seed, cleaning supplies, etc. Everything should be clearly labeled so that if an inspector arrives, they are able to identify which materials are used for organic production and how you prevent the unintended sale or use of non-organic crops. Another important piece of this is equipment, including equipment you own, rented equipment, and equipment

used by custom operators. If a piece of equipment is used on organic land and non-organic land, physical cleaning (and documentation of the cleaning) needs to occur to prevent the contamination of your organic seeds or organic crops.

ADDRESSING COMPLIANCE ISSUES

It is important to remember that as an organic farmer, you are not alone. There is a community – other organic farmers, farm professionals and your organic certifier- who is here to help you. Reach out to Rodale Institute's Organic Crop Consulting program today; we'll discuss your needs and find a solution that's right for you. Other organizations that offer technical assistance include Natural Resources Conservation Service (NRCS) and your local extension service (e.g. Penn State Extension); be sure to discuss with these groups that you're certified organic while discussing potential solutions.

Staying in communication with your certifier – including reading the certification and compliance related correspondence or returning phone calls and emails – is the first step to understanding certification expectations and preventing the escalation of a noncompliance. If you are equipped with an understanding of the regulations, you can also better advocate for yourself and understand the justification needed to address or rebut a noncompliance notification. Update your OSP, ask questions about policy and guidance documents, and be proactive with your certification.

The full "Common Crop Noncompliances and How to Avoid Them" webinar is available for viewing here: rodaleinstitute.org/education/webinars/archive. Additional free webinars can be viewed on the Rodale Institute YouTube page. PCO and the Rodale Institute also collaborated to host a webinar "Common Organic Livestock Noncompliances and How to Avoid Them," available here: rodaleinstitute.org/education/webinars/archive and featured in the Summer 2020 *Organic Matters* issue.



Rodale Institute's Organic Crop Consulting service is the newest program at Rodale Institute and fulfills the Rodale Institute's mission to assist farmers in successfully transitioning to certified organic production. This work is accomplished by providing technical assistance, such as crop rotation planning and weed management guidance, to farmers, landowners, businesses and service providers in their efforts to transition farmland to certified organic and regenerative organic systems. Rodale Institute has been conducting organic research for 40 years to support the continuous improvement of soil health on our client's operations. Crop consultants additionally translate this research into on the production plans for their farmers. This program is available nationwide and is free for farmers in the Midwest and Pennsylvania. For more information contact: Consulting@Rodale-Institute.org or 610-683-1416

PCO STAFF MODEL CORE VALUES

Taking Action for Social Justice



PCO Staff defining core value actions during recent retreat.

DIANA UNDERWOOD, DIRECTOR OF OPERATIONS

In the last couple of years, PCO worked hard on developing and refining our Core Values Statements. We focused on what these guiding principles would be as well as the specific actions that support the values. These core values guide us in our work and our day to day interactions and especially now amidst the racial injustices ever-present in today's society.

PCO stands in solidarity with those calling for racial justice, and we are exploring how we can work together to eliminate injustices that have occurred for centuries. We are beginning this hard work together as a staff, at the board level, and with our organization as a whole.

OUR CORE VALUES ARE OUR FOUNDATION GUIDING US IN THIS WORK; IN ADDITION WE ARE COMMITTED TO:

- Elevating human value in our organization – board, workplace and community – through diversity, inclusion and equity.
- Anti-racism and anti-discrimination. We have a zero tolerance for racism in and out of the PCO office. Our non-discrimination policy and associated protected char-

acteristics are included in our handbook for reference as well as our professional conduct policy. Everyone is encouraged to report violations of these policies without fear of retaliation.

- Establishing actionable steps to hold ourselves accountable.
- Sharing resources to support constant learning.
- Creating safe space and a culture of dialogue to support these efforts.

PCO has been clear about our statement of solidarity, and we are in the beginning stages of learning how we can best take the most important step – action.

WE STILL HAVE A LONG WAY TO GO, BUT THUS FAR:

- Half of the PCO staff are participating in a working group to address social justice.
- We updated our strategic plan to ensure this effort was receiving the same level of priority as our other business initiatives.
- A portion of our staff and board training has been designated for programming with experts in the social justice field.
- We identified organizations that align with our stance on racial equality and made a financial contribution.

PCO's vision is that all communities are enriched through organic food and farming, but we will not be able to achieve this vision with systemic racism ever-present in our society, our work in agriculture, and food systems in general. This is important work to our organization, our industry, and society as a whole. We hope you will join us on this journey! Please see our website (paorganic.org) for more information about organizations already doing meaningful and courageous work, and from which we can learn about inequities and racial injustice in the food system. We invite you to support them and to share additional resources.

CALL TO ACTION

Are you a BIPOC (Black, Indigenous, Person of Color) farmer or producer in our organic community open to sharing your story? We want to elevate your voice in an upcoming publication. We are interested in interviewing our client-members about their perspectives and experiences as we bring light to the injustices in our food system.

Interesting in participating? Please contact Stacey Budd (sbudd@paorganic.org or 814-422-0251 ext 230)

Rodale Institute's Organic Field Days – Virtually

Highlights from organic no-till and high tunnel tomato production workshops

Organic soybeans growing through rolled rye cover crop about two weeks after rolling and planting. Photo: Rodale Institute

EMILY NEWMAN, ORGANIC CROP CONSULTANT,
RODALE INSTITUTE

In 2020, Rodale Institute's annual Organic Field Day became Organic Field Days— and took place 100% online!

For years prior, the Rodale Field Day was in-person, but now in the age of virtual harvester demonstrations, live-broadcasted composting workshops, and more webinars than you can keep track of, Rodale Institute was able to attract farmers from *all over the world* to engage in research and educational programming.

This article highlights two of the field day workshops focused on cover crop based no-till organic systems and high tunnel tomato production, and provides you with a small taste of the content available from Rodale's virtual Field Days.

COVER CROP BASED ORGANIC NO-TILL SYSTEM

As an organic crop consultant who discusses the transition to organic with conventional farmers across the United States, the most common statement I hear is this: "I would love to transition to organic, but as a no-till conventional farmer, I don't want to till!"

These conventional no-till farmer's concerns are valid: Frequent tillage *can* have detrimental effects on the soil. Excessive use of tillage increases soil erosion and surface runoff, disrupts habitats of soil life, and reduces water holding capacity by increasing the risk of compaction. As organic farmers, though, we know that tillage is a tool in the toolbox that is used when necessary; it eliminates weeds and incorporates cover crops to boost soil fertility.

In organic systems, reducing tillage can be a serious challenge. Fortunately, Rodale Institute has prioritized con-

ducting research to address these challenges for organic farmers. We see tillage as a tool, but we also see the benefits of no-till systems. Finding the synergy between organic no-till systems is incredibly vital!

One experiment that is being executed by Dr. Yichao Rui, a Soil Scientist at Rodale Institute, looks closely at different methods of terminating cover crops in reduced-till or no-till situations. In the experiment, the following crop rotation is followed:

- 1 Plant winter annual cover crop Rye or Hairy Vetch;
- 2 Terminate cover crops with experimental treatment (described next) in Spring; Plant cash crops into cover crop residues (Soybean into Hairy Vetch, Corn into Rye);
- 3 Residues of cover crops form a thick mulch and provide season long weed suppression;
- 4 Harvest cash crops in Fall.

BENEFITS TO ROLLER CRIMPING

- Reduces erosion
- Adds organic matter
- Reduces labor
- Increases biodiversity
- Improves soil health
- Reduces costs
- Saves time
- Reduces weed pressure

The experiment has been designed to look at a few different treatments to terminate the fall cover crop:

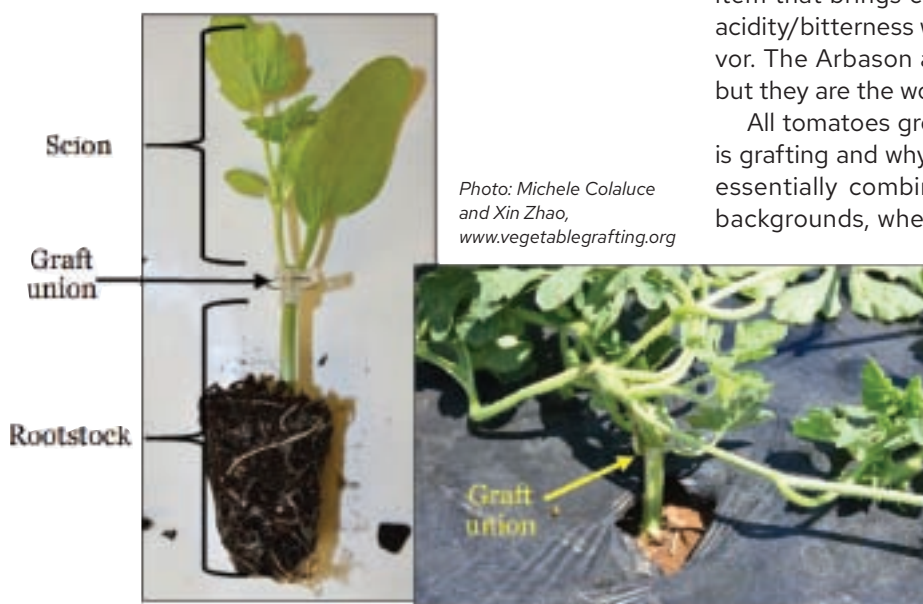
- Tillage (Plow and Cultivate: control treatment)
- Rodale Roller Crimper
- Dawn Roller Crimper
- Haybine mower, tedder to ted hay
- Flail mower
- Flame weeder

The results of this experiment offer good news for organic farmers. The roller-crimper based technology was just as effective as tillage for controlling weeds and did not impact the yield.

Here are some quick tips if you want to experiment with roller crimping in your grain operation:

- Choose a cover crop that is going to be successfully terminated by the roller crimper. Rodale has found the most success with hairy vetch and winter rye, but you may also find success at your operation with crimson clover, winter barley, buckwheat and field peas that may work particularly well for your regions.
- The roller crimper will not kill red clover, alfalfa or annual ryegrass.
- The cover crop should be rolled when the crop reaches anthesis (the flowering period of the plant); the rule of thumb is to roll between 50% and 100% anthesis.
- Cover crop “cocktails” may not work, as “anthesis” may not occur uniformly with the different species of cover crops.
- The cover crop should be rolled in hot, dry weather conditions.
- A high amount of biomass is needed for the cover crop to effectively prevent weeds from growing in your cover crop mat. Make sure you are seeding at the correct rate.

So what happens if you roll your cover crop and drill your cash crop perfectly, and you still get too many weeds? Or what happens if your rolled cover crop’s biomass does not create a thick enough barrier to prevent weeds? That is where the tractor-mounted high residue cultivator comes to the rescue. This implement has residue slicers that cut through the cover crop mulch to create a path for the sweeps to ride under the mulch just below the soil surface to cut weed tops from their roots or uproot them. Two press wheels press down firmly on the mulch, facilitating clean slicing under the mulch and leaving the mat of cover crops undisturbed.



Unfortunately, mowing to terminate the cover crops has not been as successful. Mowing with the hay bine and then tedding to evenly distribute the hay resulted in lower yields and higher weed pressure. When a rotary mower or flail mower was used, it chopped the cover crop too fine and the cover broke down too quickly.

Rodale Institute will continue to focus research toward cover crop based organic no-till systems using the roller crimper and other methods, such as mowing, to make this system consistent. You can stay up to date on research by checking out our website at: rodaleinstitute.org/science/farming-systems-trial/.

HIGH TUNNEL PRODUCTION & TOMATO GRAFTING

Dan Kemper, Assistant Farm Manager at Rodale Institute, offered some important tips and tricks about high tunnel tomato production at the Virtual Field Days. Dan manages all vegetable production fields at Rodale Institute.

High tunnels can improve profitability and productivity for farmers by extending their growing season. These structures are an investment; it is important to determine which tunnel type may best suit your operation. There are several different sizes, structures and shapes. Rodale Institute utilizes a gothic-style high tunnel, but in addition to this style, there are the classic hoop houses and low tunnels, sometimes call “caterpillars.”


Rodale Institute gothic-style high tunnel is 30 feet by 96 feet. This works well for high tunnel tomato production because the roll up sides make it easy to control the temperature and the gothic point sheds snow easily, protecting it during the winter months. Additionally, the cross bars allow the tomatoes to be trellised.

Within the high tunnel, there are four different varieties of tomatoes that are grown: Margold, Great White, Caiman and Arbason. Both the Margold and Great White are heirloom varieties that our consumers ask for by name. Their bright, contrasting colors are an attractive farmers market item that brings customers over. They also have very low acidity/bitterness which provides for a very sweet/salty flavor. The Arbason and Caiman are red and not very flashy but they are the work horses and have a high yield.

All tomatoes grown in the high tunnel are grafted. What is grafting and why even take the time to do it? Grafting is essentially combining two plants with different genetic backgrounds, where one provides the shoots (scion) and

the other provides the roots (rootstock). In our hybrid plants, as Dan famously says it, “The roots stay the roots and the fruits stay the fruits!” What this means is that we are still able to produce the variety of tomatoes we want to grow, but with the benefit of the rootstock being disease resistant and hardier. This is incredibly important in organic production: when your toolbox is limited


continued page 28




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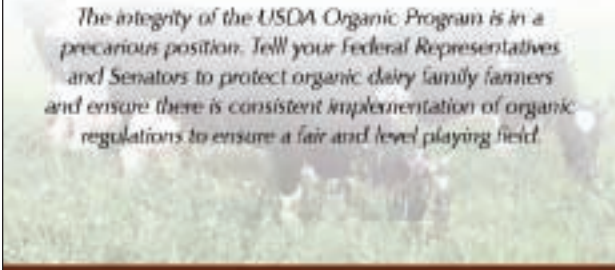




**NODPA: The Independent
Producer Voice for
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NODPA provides education, resources, advocacy and discussion
for organic dairy family farmers throughout the Northeast.

For more information about NODPA, NODPA Field Days,
Odairy discussions, what's happening in Washington, and other
resources available for organic dairy family farmers, visit
www.nodpa.com

*The integrity of the USDA Organic Program is in a
precarious position. Tell your Federal Representatives
and Senators to protect organic dairy family farmers
and ensure there is consistent implementation of organic
regulations to ensure a fair and level playing field.*

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PCO IMPLEMENTS NEW AND IMPROVED CERTIFICATION DATABASE

**Ecert database to increase
process efficiencies and
improve customer service**

ANGELA MORGAN, QUALITY SYSTEMS AND IT
MANAGER

As many of you may know, in 2015 PCO implemented a custom built, in-house designed, Filemaker database, ACES (Automated Certification E-Form System) as our primary certification database. With its client and inspector portals and unique data integration and processing capabilities, it remained a viable option for several years. However, with inherent Filemaker limitations, as well as changing industry and business demands, it became necessary for PCO to enhance our certification database and the subsequent service to both our internal and external customers.

To this end, part of PCO's 2020 strategic action plan is to provide an efficient certification database to decrease the hours spent on certification by PCO staff & clients alike. Research led us to ECert, a well-established, complete certification system, designed specifically for organic certification, and configured to comply with the National Organic Program (NOP) systems and data collection requirements. ECert is currently used by many other organic certifiers and is proactively upgraded to continue to meet the changing needs of organic certification and its applicable regulations. Updates and changes are available for implementation by all participating certifiers, with additional customization to meet the individual certifier needs. Rich with features such as a web portal and app for easy access, workflow management, automatic notifications, data and business analytics, and guaranteed uptime, ECert will provide:

- Increased process efficiencies
- Improved customer service
- Enhanced performance and performance measures
- Modernized business model
- Increased business intelligence

PCO will be undergoing a long implementation period to

switch to the new certification database. During a pre-project phase that began July 1, 2020, PCO provided information about our current database and certification procedures, along with desired process updates to begin the configuration of our Ecert database. During the implementation period that began September 2020, the database will be configured and extensively tested and end users will be given thorough training on the new system. We currently anticipate a go live date in February 2021. A slow and methodical implementation will allow us to configure the database for PCO's use and ensure data integrity during the transition. Staff, client and inspector input will be solicited as we build our new database.

While the database switch will mean changes for all of us, we are confident that the end product will result in a better user experience for all, and we look forward to providing an efficient database system that will enhance the overall certification process.

Cover Crops for a Crop Rotation Plan

continued from page 3

Managing Cover Crops Profitably, which is available online for free or can be ordered in print; the Midwest Cover Crop Council has an online "Cover Crop Decision Tool," which allows farms to narrow their search quickly using their farm and goals information (the Northeast Cover Crop Council is developing a similar tool to debut shortly); NCAT's ATTRA has the free publication *Overview of Cover Crops and Green Manures*; local extension services (Penn State, Cornell, Ohio State, etc.) offer in person and over the phone technical assistance, as well as extensive publications online and annual agronomy guides; and USDA NRCS provides both technical assistance for conservation measures such as cover cropped and cost-share for some cover cropping practices. Additionally, if you're a farmer who is considering organic certification or currently transitioning your land to seek certification, Rodale Institute provides organic crop consulting services (for a limited time, this service is free to Pennsylvania and Midwest farmers) on subjects like crop rotation planning and managing fertility and weeds. And, as always, if you have a question about compliance with NOP regulations or would like assistance connecting to a resource, you can contact PCO and speak with your certification specialist.

RESOURCES

- **SARE's Managing Cover Crops Profitably**
sare.org or 301-405-4964
- **Midwest Cover Crop Council's Decision Tool**
Available online only at: mccc.msu.edu/covercroptool
- **NCAT ATTRA's Overview of Cover Crops and Green Manures**
<https://attra.ncat.org/product/overview-of-cover-crops-and-green-manures/> or 1-800-346-9140

President's Message



BY TINA ELLOR, PCO ADVISORY BOARD PRESIDENT

As I launch into this PCO President's message, I'd like to express gratitude. Gratitude for those things that ARE working amongst so much bad news about what is NOT working during this pandemic and these times of social unrest. (I prefer to think of it as new and improved social awareness). PCO, notably, is working hard toward fulfilling our vision/mission. Our new Executive Director, Diana Kobus, is working hard getting to know PCO, our board members, our staff, and our communities and learning from all of our stakeholders how best to lead PCO into the brightest future. Your board is working hard to support Diana in her new role and to set the best strategic course for PCO for the next few years.

Everyone has faced challenges in these uncertain times and everyone has had to adapt to doing business and work in new ways. PCO's board is no exception. You can see from the screenshot I took at our last board meeting that we have continued to work hard on PCO's behalf from our homes and farms. We are preparing for our annual board retreat which happens in October every year and is normally a chance for us to meet in person, get to know each other, and to forge bonds and relationships, which speaking for myself, have enriched my life personally and professionally in many and lasting ways. In our necessary virtual retreat this year it is our plan to take a deep dive into topics that matter – setting strategic direction to support PCO's vision/mission. We will be working in small groups so that more voices can be heard and drilled down so that we can connect our strategy to metrics to operations and attainable and measurable goals. In particular, we want to work out what specifically strategic growth looks like for PCO. If you have thoughts on this, please reach out to me- my contact information is below.

We will also be scheduling social time during our virtual meeting to get to know one another and the PCO staff better. Virtual will never be as good as in person, but we are going to do our best to continue to build rapport from a distance. Getting to know the PCO community as I have said before has brought, I feel, more value to me that I can possibly return. I am con-

stantly impressed and inspired by the work of this board, by its collaborative nature and its effectiveness. And I have said before on this page that every time I get the opportunity to work with PCO staff I am inspired and I always learn something new.

And now I have an ask of you, or rather I'd like offer up a great opportunity. I want to encourage you to consider serving on the PCO board of directors and/or nominating individuals from our communities that you feel could make a valuable contribution to PCO's vision/mission and be open to the kind of collaboration and personal and professional growth opportunities that such service has to offer. Not only that, but I would encourage you to make sure to vote when the slate of candidates is presented – your input matters.

Thank you, and remember, if you call me, leave a message so I know your call is legitimate.

– Tina

Tina Ellor
tellor@phillipsmushroomfarms.com
610-656-7250



PCO Board and staff during Summer 2020 virtual meeting.

Dear Aggy



Dear Aggy,

We're expanding our mushroom production, and we'd like to import ready-to-use spawn inoculated mushroom logs. I'm assuming these are allowed, since these are all natural, without any synthetic components. Will we be able to use these to produce organic mushrooms?

— Thanks, Martha M.

Hi Martha,

Actually, the National Organic Program clarified in 2019 that ready-to-use spawn products **must be certified organic** in order to be used to produce organic mushrooms. It's important to distinguish between actual mushroom spawn, and ready-to-use products which consist of substrate pre-inoculated with spawn. This would include the ready-to-use mushroom logs/blocks you are asking about. "Spawn" is defined as colonized media used to inoculate substrates on which mushrooms are grown. Spawn is treated just like seed under the organic requirements, and must be certified organic unless not commercially available.

Ready-to-use mushroom blocks/logs may be available in several forms, including but not limited to: formed as blocks, packaged into plastic bags, or shaped into logs. For example, "shiitake mushroom logs" may consist of plastic bags containing mixtures of fibrous materials as substrate (e.g., wood chips, sawdust, wheat bran, husks), processed mined substances (e.g., gypsum), and mushroom inoculant.

Because ready-to-use spawn includes all components to produce harvestable mushrooms, including the spawn, growth medium, and nutrients, it must be produced by certified organic operations and listed on the organic certificate to be further used in organic mushroom production (see § 205.100(a) What has to be certified).

— Sincerely, Aggy

Dear Aggy,

I've been trying to use a few new materials this summer, and although I generally received really fast responses, there were some reviews that took unexpectedly longer. Is there anything I can do to receive a faster response?

— Thanks, Matt,

Hi Matt,

Thanks for letting us know about the unexpected delays. Our materials review team is dedicated to providing accu-

rate and speedy reviews – but must also complete a series of steps along the way that can potentially delay the process. The best way to get a fast turn-around is to make sure you are providing PCO with the full and correct product name, as well as the manufacturer name and contact information. If you have a material you need a quick answer on, you can also reach out to our materials review team directly through our website, which allows you to attach a copy of the label if you have access to that. You can also directly request a material review by calling the PCO office at 814-422-0251 and selecting the option to speak to the Materials Team. Jen, April, or Sabine will take down the name of the product, manufacturer, and how you want to use it, and they will begin the review right away.

Once the Materials Team starts a review, they reach out to the manufacturer for ingredient information. This step is the most unpredictable. Some manufacturers are slow to return our call or email, and some don't want to share ingredient information at all. The best case scenario is when manufacturers provide us with ingredient information and labels within the hour. In other instances, we oftentimes encounter delays when we have to request GMO statements or manufacturing details. The speed of our review process depends on manufacturer cooperation. In addition, we have seen some recent delays in manufacturer responses, likely due to the challenges posed by the COVID-19 pandemic. We appreciate your patience as we work with these manufacturers to confirm that your input material is fully in compliance with the organic regulations.

Once PCO receives complete ingredient information from the manufacturer and can make a status determination, we will send you a letter, either via mail or email, with our review decision. If you would like to get an update on an urgent review, please do not hesitate or email our Materials team.

— Sincerely, Aggy

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The AmazonSmile Foundation will donate 0.5% of the purchase price from your eligible AmazonSmile purchases to PCO at no additional cost to you. To shop at AmazonSmile simply go to smile.amazon.com from your web browser. Then select "**Pennsylvania Certified Organic**" using your existing Amazon.com account. You may also want to add a bookmark to smile.amazon.com to make it easy to return and start your shopping and supporting!

Transitions

Inspiration for Organic: A Q & A with Transitioning Farmers

Robyn Jasko, along with her husband Paul David, operates Homesweet Homegrown, a 3+ acre pepper farm in Kutztown, Pennsylvania. They are in the process of organically certifying their farm and products. Homesweet Homegrown raises 45 varieties of hot peppers, five flavors of hot sauces, and four flavors of dose extracts.



Robyn shares insights on Homesweet Homegrown's transition to organic with Sam Malriat, a Rodale Institute Organic Crop Consultant. PCO thanks Robyn and Rodale for working to provide Robyn's story, and is available to discuss the requirements of becoming certified organic for anyone interested. Call or email our office to speak with one of our friendly staff.

1. Can you tell us a bit about your operation?

We are Homesweet Homegrown and we are located in Kutztown, PA. We started as a farm-to-bottle hot sauce company and now we have expanded to also include fresh peppers that we ship around the country and hot sauce micro-dose extracts that are pure pepper extracts. Everything is grown at our farm in Kutztown. We have about 3 acres that we farming right now.

2. When did you start farming? Did you come from a farm family or farm background?

I actually did not. Originally I am from New Jersey and I have a background in marketing and advertising. I have always loved gardening. I started the community garden at Kutztown University in 2008 and was able to manage the garden in exchange for having a plot of land to work with. I used that as a testing ground and really learned a lot. I started a blog on sustainable living, homesteading, eating well and living local called Grow Indie and that grew into a website, and then a book deal. I published my first book, Homesweet Homegrown, in 2012. Before leaving for my book tour, I planted a lot of habaneros, lemon drop chili and ghost peppers and came back to a ton of peppers. I thought "why don't I try making some hot sauces?" and so we did. I created recipes and labels for three hot sauces and took them on book signings as a homegrown gift to offer along with my book. People really liked the sauces so I started a kickstarter with a goal of \$800 to cover all of my pepper starts. I hit my goal overnight and the kickstarter grew to



Paul David, Ajax David and Robyn Jasko, of Homesweet Homegrown, a 3+ acre hot pepper farm in Kutztown, Pennsylvania currently transitioning to organic with PCO.

Photo: Homesweet Homegrown

\$53,000 and the highest selling hot sauce in kickstarter history. In 2013 a friend saw we had outgrown the community garden space so he connected me with a landowner that had been farming GMO corn. He suggested connecting with the landowners and converting the land to organic. So that's how we were able to locate our current farmland. As soon as I got access to the land I put in organic winter rye to get the two years of GMO corn out of there. Three years later, after lots of organic matter and tons of building up the soil we were able to get certified naturally grown. That's the land that we are farming now and in process of certifying organic. It's been quite an evolution.

3. What influences helped to establish your niche market connections?

At Rodale Press I volunteered at Organic Gardening test garden and I loved that we would get a preview of all the latest varieties and get to test them out. One year when the indigo tomato came out it was first purple tomato to hit the market and we were able to test it out and see what it tasted like. I got really excited about finding obscure varieties so that definitely influenced me; knowing about new varieties hitting the market and also rediscovering heirloom varieties. Because of the internet and how things had become so globalized, we were able to track down seeds that we couldn't years ago in part because Baker Creek [an heirloom seed provider] has been expanding so much.

Another thing that influenced me was that in 2014 we started doing markets in NYC to promote our hot sauces. I had never sold to chefs before and was totally surprised

when chefs from Superiority Burger and Gramercy Tavern would come up and try a fresh pepper. I wondered “who is this trying a fresh pepper” and it turned out that they were some of the most famous chefs on the east coast. I sold peppers to Momofuku Noodle Bar, Blue Water Grill, The Stone Barn, etc. I would talk to these chefs and they would tell me about the varieties that they like so that would inspire me for next year because you always want to have the rarest thing at market so it creates kind of a buzz. So that inspired me and also just talking to other growers and seeing what’s out there. I do spend my winters trying to find the rarest chili peppers we can find which is very fun.

4. What is your inspiration to become certified organic?

It has always been the goal to be certified organic. The only deterrent was that I thought it would be financially impossible. I always thought it would cost so much money, and then the paperwork. And then when I talked to a visiting group at Rodale and heard that there are programs out there and that it’s not that hard I thought “I better get on this.” Getting certified organic has always been something I wanted to do. We have never used a spray or pesticide, not even a one. I treat our farm as I would a home garden and use that same methodology. When I looked into getting the non-GMO label on our bottles, it was very expensive. But this was all research I had done five plus years ago. Now there are a lot more small batch companies, sliding scale principles and subsidies available, and these things seem more accessible than I think they were 5-7 years ago.

5. What advice would you give another farmer considering transitioning to organic?

I have so much advice. My one suggestion is to definitely start small. What I have learned at Rodale from reading so much is the better the soil the more production you get and the healthier the plants are. If you want to start a farm you don’t need 15 acres. You can grow a lot on just half an acre or one acre. You can get a lot more production out of your

plants if you treat them well. I try to think of that and also I think about the end product. I have been at market with other people growing Shishito peppers and similar peppers. The Gramercy Tavern chef came up to me and bought my Shishito peppers instead of others which was a huge compliment. He said the taste was better because of the terrain. He had a big focus on that and I agree. It’s the way you treat the plants that comes through in the flavor. If you push them to get as much production as possible with fertilizer or other inputs it just doesn’t taste as good. From my experience, the more natural you can be the better your plants will taste. I try to keep things as natural as possible. I am a complete agrarian. I think the farm reflects those values.

6. We all know that farming is extremely hard work, often requiring long days in difficult conditions. What motivates you to get up each day and keep going?

That’s exciting. I get really psyched on the emails that I get now every single day from people getting our peppers. There are a lot of competing pepper farmers out there but when someone sends an email that says “Your habaneros are the best I have had.” or “Your Brazilian starfish; I have never had them like this.” It’s really exciting. When people send me notes like this, and I get them pretty much every day, especially during this season, It makes me feel like all the extra work we do to really create a nice environment for our plants pays off. People feel that- the vibes. We try to have as high a vibe farm as possible. I feel like people really appreciate it.

7. Is there anything else you would like to add?

The only thing I would add is that if anyone is even thinking about going organic, don’t think anymore- just do it. Get off the fence, and just do it. Why not? I had always been so intimidated by the idea. Now I wonder why I was so intimidated.



Photo: Homesweet Homegrown



Robyn Jasko, Owner of Homesweet Homegrown, is working with Organic Crop Consultants at the Rodale Institute. The consulting services are currently FREE to Pennsylvania farmers transitioning to organic thanks to funding from the PA Department of Agriculture. Farmers who make the transition to organic can earn two to three times the price of their conventional counterparts and increase the value of their land, giving farmers a valuable asset for future generations. Rodale Institute is a trusted resource for technical assistance, regulatory advice and community connections. Consultations typically begin with a phone call, followed by a site visit. Support is provided throughout the entire transition to make sure farmers are on the right track.

Farmers that are interested in receiving consulting services can contact the Rodale Institute by calling 610-683-1216 or emailing Consulting@RodaleInstitute.org.

Certification Update

Kyla Smith
Certification Director



REQUESTING A TEMPORARY VARIANCE FROM ORGANIC REGULATIONS

As we are entering the end of the grazing season and as many operators have been experiencing dry and drought conditions, we wanted to take the opportunity to review the allowance and process for requesting a temporary variance. PCO has historically received requests and worked with operations when requesting temporary variances specifically related to the 30% dry matter intake (DMI) or 120 days on pasture requirements per the organic regulations. While these are the requests we typically get, temporary variance requests are allowed for other parts of the regulations as well.

Certified organic operations must adhere to the organic regulations outlined in 7CFR Part 205 and describe their specific production practices in their organic system plan. However, there may be circumstances that arise that challenge, or even prevent, operations from following the required organic regulations (e.g. drought). When this happens, it is critical for operations to communicate these challenges to their certifier. The regulations do allow deviation from certain parts of the regulations but there is a process that must be followed, including approval from the National Organic Program (NOP). This is not a decision that a certified organic operation can make on their own.

This process is outlined in the organic regulations at §205.290 and further described in NOP 2606: Temporary Variance Instruction. This instruction document is available in the NOP Program Handbook at: ams.usda.gov/sites/default/files/media/2606.pdf (for a hard copy please call the PCO office).

First it should be noted that temporary variances may only be requested for certain parts of the regulations. These include the following:

- Crop Sections of NOP Organic Regulations: Soil fertility and crop nutrient management; Seed and planting stock; Crop rotation; Crop pest, weed, and disease management; Wild-crop harvesting (§§205.203-205.207)
- Livestock Sections of NOP Organic Regulations: Origin of livestock, Livestock feed (except that feeding non-organic feed to organic livestock will not be granted as a temporary variance), Livestock healthcare, Livestock living conditions, Pasture practice (§§205.236-205.240)
- Handling Sections of NOP Organic Regulations: Organic handling requirements, Facility pest management, Commingling and contact with prohibited substance prevention (§§205.270-205.272)

Temporary variances will not be granted for any parts of

the regulations except for the areas listed above, including any practice, material or procedure prohibited at §205.105.

Second, temporary variances are only allowed, at the discretion of the National Organic Program, for the following reasons:

- Natural disasters declared by the Secretary
- Damage caused by drought, wind, flood, excessive moisture, hail, tornado, earthquake, fire or other business interruption; and
- Practices used for the purpose of conducting research or trials of techniques, varieties or ingredients used in organic production.

Third, the general steps for requesting a temporary variance are as follows:

1. Certified operation submits request to PCO, along with supporting documentation to justify your request.
 - a. PCO does have a template form. Please contact your Program Assistant or Certification Specialist to request the Temporary Variance Request Form.
2. PCO reviews requests and supporting documentation and submits a recommendation to either grant or deny the request to the National Organic Program.
3. NOP reviews submitted recommendations, approves or denies the recommendation, and notifies PCO of their decision.
4. PCO notifies certified operation.
5. NOP publishes temporary variance decision on its web site.

As stated above the temporary variance requests submitted to PCO have mostly been in regards to meeting the pasture rule requirements (e.g. 30% DMI from pasture and 120 days on pasture). And as outlined above in the general steps, certified operations and PCO must work together to submit these requests and recommendations to the NOP. It is very important that the certified operations submit the supporting documentation to justify the temporary variance request. Without this documentation, PCO will not be in the position to make a recommendation to the NOP to approve the request. Again, focusing on pasture rule requirements (since those are the main requests we get), below are suggested questions to provide answers to in your request to PCO, along with supporting documentation:

- (1) What is the weather condition affecting grazing? If drought, are you in a designated drought area? If not, do you have evidence/supporting documentation of the conditions?
- (2) What is your current standing (i.e. what is your current average for DMI from grazing and what is a reasonable estimate for grazing days left)?
- (3) Do you have an emergency grazing season plan in

your OSP (e.g. hay fields to graze or summer annuals to graze) and have you followed it? If you can't follow it due to weather, explain why.

Lastly, I cannot stress enough that it is essential to talk with your Certification Specialist about your challenges in meeting the organic regulations (e.g. pasture rule requirements) as early as you can so that they may assist you in the process in a timely manner.

NONCOMPLIANCE, ADVERSE ACTION AND MEDIATION PROCESS

The inspection, review, and compliance process are essential to upholding the integrity of the organic seal and ensuring a level playing field for certified operations. If it is determined that an operation is not in compliance with applicable regulations, they may find themselves on the receiving end of a Notice of Noncompliance or, under certain conditions, a Notice of Proposed Suspension. It is important to understand what these notices mean and how you can respond to them.

First let's review what each notice means:

Notice of Noncompliance: This is issued to an operation when they have violated the organic regulations in a way that is significant enough to require a corrective action plan be submitted to PCO to ensure and verify compliance. These do not indicate systemic failure of an operation's adherence to or implementation of their organic system plan (OSP).

Notice of Proposed Suspension: This is issued when an operation fails to respond to a Notice of Noncompliance.

- A combined Notice of Noncompliance/Proposed Suspension may be issued when a systemic failure is identified with an operation's adherence to or implementation of their organic system plan (OSP).

Next it is important to know your options for how to respond to each notice because they are not the same.

For a Notice of Noncompliance:

1. PCO will identify a time by which you need to respond to your Notice of Noncompliance on the letter.
2. Your options are to:
 - Submit a correction to the noncompliance within the timeframe; or
 - Submit a rebuttal in writing to the PCO office
 - Rebuttals must contain written supporting documentation to justify your rebuttal

For a Notice of Proposed Suspension:

1. PCO will identify a time by which you need to respond to your Notice of Proposed Suspension on the letter.
2. Your options are to:

- Submit a mediation request in writing to PCO (we have a Mediation Request template form. Please contact your Program Assistant or Certification Specialist to obtain a copy of this form)
- Submit an appeal to the NOP

Please note that for a Notice a Proposed Suspension correcting the noncompliance is no longer an option. This means that simply paying your outstanding balance, submitting your annual update paperwork or submitting your corrective action plan alone will not resolve the Notice of Proposed Suspension. In order to fully resolve the Notice of Proposed Suspension, in addition to correcting the noncompliance, you must also request mediation in writing to PCO; or you have the option to appeal to the NOP.

After a mediation request is received by PCO, we will decide to either accept or reject the request for mediation. If PCO accepts, we will either engage in an informal mediation session with you (e.g. phone call to discuss terms) or we can engage in a mediation session with a third-party mediator. The result of either type of mediation will be a Settlement Agreement that outlines terms that an operation must adhere to in order to stay certified.

It is also important to note that a surrender of one's certification at this stage does not alone resolve the Notice of Proposed Suspension. Surrender may be a term that is outlined in a Settlement Agreement.

The Settlement Agreement will be sent to you to sign and the signed copy must be returned to PCO. The noncompliances identified in the Notice of Proposed Suspension will remain open until the terms in the Settlement Agreement are met. If the terms are not met, then PCO will issue you a new Notice of Proposed Suspension. Your options will remain the same, in that you would need to request a mediation or appeal.

I know the noncompliance process is dry and can be quite complicated at times. However, understanding the process will help you to remain in good standing with PCO. Please continue to communicate with your Certification Specialist regarding questions you may have about the process or in direct response to noncompliances you may receive. We aim to make a generally unpleasant process as pleasant as we can.

Legislative Update

Kyla Smith, Certification Director

FSA ANNOUNCEMENT TO REDUCE ORGANIC CERTIFICATION COST SHARE

United States Department of Agriculture (USDA) Farm Service Agency (FSA) has released funds for this year's Organic Certification Cost Share Program (OCCSP), which will reimburse organic operations for a portion of certification fees paid Oct. 1, 2019, through Sept. 30, 2020. **Appli-**

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cations are due by October 31. For more information and instructions on how to submit your application through your FSA county office or through participating State agencies, please visit PCO's cost share webpage at: paorganic.org/certification/get-started/fees/ or call PCO's Accounting Department at 814-422-0251 x217.

Please note there has been a change to the reimbursement rate. USDA has reduced the reimbursement rate to 50 percent of the certified organic operation's eligible expenses up to a maximum of \$500 per certification scope. This is a reduction from the expected amount of 75 percent of their eligible costs up to \$750 per scope. USDA's explanation for the reduction is "due to the limited amount of funding available and will allow a larger number of certified organic operations to receive assistance. If additional funding is authorized at a later time, FSA may provide additional assistance to certified operations that have applied for OCCSP, not to exceed 75 percent of their eligible costs, up to \$750 per scope."

PCO urges operators that utilize the cost share program to submit their cost share application as soon as possible.

CDC ISSUES INTERIM COVID-19 GUIDANCE FOR AGRICULTURAL WORKERS AND EMPLOYERS

The United States Centers for Disease Control (CDC) and the Department of Labor's Occupational Safety and Health Administration released interim guidance on protecting agricultural workers from exposure to COVID-19. The recommendations provide key points that agricultural employers can consider to protect workers including workplace safety checklists, cleaning and sanitation guidelines and processes for managing illness among employees. These prevention and management measures based on a work site risk assessment, including shared housing and transportation, are intended to assist agricultural workers from spreading COVID-19. For more information on the CDC guidance, visit their dedicated webpage at: cdc.gov/coronavirus/2019-ncov/community/guidance-agricultural-workers.html.

Materials Update

Jen Berkebille
Materials Program Manager



Please note the following status changes for materials reviewed by PCO for use by certified operations.

ALLOWED

■ Crop Materials

- **Arm & Hammer Baking Soda** by Church & Dwight Co., Inc., is allowed for crop disease control, with the following restriction:

Pesticide. May be used if preventative, mechanical, and physical management practices provided for at §205.206(a)-(d) are insufficient to prevent or control crop pests, weeds, and diseases. The operator must document conditions for using the substance in organic system plan

- **Checkmate VMB XL** by Suterra LLC is allowed for crop invertebrate pest control, with the following restriction:

Pesticide. May be used if preventative, mechanical, and physical management practices provided for at §205.206(a)-(d) are insufficient to prevent or control crop pests, weeds, and diseases. The operator must document conditions for using the substance in organic system plan

■ Livestock Materials

- **Aqua Source Electrolyte + C** by Paragon Specialty Products, LLC is allowed as a medical treatment with the following restriction:

Medical treatment. Must not be administered in the absence of illness. Records must be kept documenting specific animal treated, treatment/dosage used, and duration of treatment. §205.238(b)

PROHIBITED – Operators must immediately discontinue use of these products unless otherwise noted

■ Processing Materials

- **Supradisc I & II** by Pall Corporation is prohibited as a filtering aid.

Standards and Policy Update

Jen Berkebille, Materials Program Manager

PCO DEVELOPS POLICY ON GROSS ORGANIC SALES

PCO has developed a policy on gross organic sales to identify how this sales assessment fee is applied to various types of operations. The policy states:

The sales assessment fee is calculated on an operation's annual gross organic sales for farming, handling and processing operations in the previous year except that:

- for brokers/distributors and operations that only repackage organic products the fee will be calculated on the difference between the purchase and sale price of the organic products
- for operations that handle and/or produce organic product and do not "sell" products (e.g. co-packers, storage facilities, transloaders) but are paid a fee for service, this fee is assessed on the gross organic

income obtained from handling or processing organic products.

No sales assessment is charged to operations with \$5,000 or less of organic sales.

The sales assessment fee is applicable to new applicants if they had organic sales or income in the previous year. Organic sales or income in the previous year for a new client may occur if a new applicant is switching certifiers or if an operation was previously certified by PCO or another certifier and is switching legal entities but the responsibly connected person remains the same.

PCO UPDATES STANDARDS OF CONDUCT POLICY

PCO has updated our policy on standards of conduct to clarify expectations for behavior:

PCO is committed to the highest standards of workplace excellence. The manner in which we interact with each other is critical to cultivating and maintaining a meaningful, safe, and effective workplace environment. This Professional Conduct Policy applies to all PCO employees, board representatives, consultants, contractors, and agents doing business with PCO. All named individuals are to conduct themselves in an appropriate and professional manner at all times when performing duties and in all communications regarding the organization. Professional behavior includes respecting fellow employees, members, board representatives, and affiliates doing business with PCO; taking responsibility for one's choices and actions; accepting the consequences of one's inappropriate choices and actions; and communicating in a professional and courteous manner at all times, whether verbal, non-verbal or written. PCO does not intend this list to be comprehensive or to limit PCO's right to take action deemed appropriate by PCO in response to any other conduct it deems inappropriate. Engaging in any conduct PCO deems unprofessional or inappropriate may result in any disciplinary or other action PCO deems appropriate under the circumstances, including but not limited to termination, finding of non-compliance, discontinuance of service, or rejection of an application.

The following are examples of conduct that may be considered a violation of this policy:

- **Incivility:** Behavior that is rude, condescending, or otherwise socially unacceptable is prohibited. This includes name-calling, raised voices and petty meanness, use of threatening, harassing, vulgar or abusive language and/or inappropriate advances of a sexual or other nature directed to any representative of PCO or a client of PCO.
- **Non-Cooperation:** Insubordination to a manager's lawful and reasonable instructions, or lack of cooperation with fellow employees, members, and external bodies is prohibited.

- **Defamation or Misrepresentation:** Misrepresenting the company's products or services or its employees, making derogatory comments, whether written or oral, regarding PCO, is prohibited, dishonesty or falsification of any records supplied by or to PCO.
- **Disruptive Behavior:** behavior that interferes with the functioning and flow of business operations. This includes gossip, poor reaction to feedback on conduct or job performance, outbursts of anger, inappropriate tardiness and/or absenteeism, or engaging in any criminal activity.
- **Unauthorized use or possession of PCO property.**
- **Violation of any other PCO policy.**

PCO UPDATES QUATERNARY AMMONIUM COMPOUNDS POLICY

PCO's policy on Quaternary Ammonium Compounds was updated to clarify testing methods that may be approved by PCO. Full text of the updated policy states:

Quaternary Ammonium Compounds (QACs or Quats) are prohibited for use in direct contact with organic products or livestock. Quats are also prohibited for use in indirect contact with organic products unless used according to a PCO-approved residue testing protocol. Operator must demonstrate that residues do not contact organic product. Residue testing results must verify no quat residue. Residue testing protocol, cleaning log, and test results must be documented.

One of the following testing methods may be approved by PCO:

- 1) Verification of no quat residue present on all contact surfaces using a low-ion test strip prior to each organic run. Procedures and test results must be documented.

or

- 2) A standard operating procedure proven to reliably verify that no quat residue is present may replace the need to test prior to every organic production run. The procedure must specify the specific steps that are taken to ensure residues are not present, which may include necessary pressure, temperature, quantity, and timing of the rinse as found in the initial no residue test result. Procedure must include monitoring and periodic residue testing to ensure continued efficacy, which must be documented.

PCO UPDATES WITHDRAWALS AND SURRENDERS POLICY

PCO's policy on withdrawals and surrenders has been updated to outline the parameters around withdrawals of applications for certification and surrenders of all certification scopes for which an operation is certified:

Withdrawal of Application

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- According to §205.402(c), an applicant for organic certification may withdraw its application at any time. An applicant who withdraws its application shall be liable for the costs of services provided up to the time of withdrawal of its application (see Fees section below).
- An applicant that voluntarily withdraws its application prior to the issuance of a notice of noncompliance will not be issued a notice of noncompliance. Similarly, an applicant that voluntarily withdrew its application prior to the issuance of a notice of certification denial will not be issued a notice of certification denial.
- A withdrawal of application may be submitted verbally or in writing.

Surrender of Certification

- According to §205.404(c), once certified, an operation's organic certification continues in effect until surrendered by the organic operation or suspended or revoked by PCO or the NOP.
- Operations must remain in compliance with NOP regulations and PCO policies and procedures until the effective date of an operation's surrender.
- A certified operation may surrender its certification or a portion of its certification (e.g. scope) at any time. A surrender of certification may be submitted verbally or in writing.

- In order to prevent a lapse in certification, operations that are switching certification agencies should maintain their certification with PCO until the new certification is received. Once the new certification is received the operation may surrender its certification.
- If an operation surrenders after receiving an adverse action notice (e.g. Notice of Proposed Suspension or Revocation), the surrender will be processed through a settlement agreement.
- Upon the effective date of an operation's surrender, the operation is no longer authorized to sell, label or represent products as certified organic by PCO or use the PCO logo.

The operation may re-apply for certification at any time, by following the procedures for new applicants as outlined in §205.401.

Fees

Depending on the time of withdrawal or surrender, a portion of fees paid may be refunded.

- If notice of withdrawal or surrender is received prior to the completion of the initial review: One half of all fees paid up to the date of withdrawal or surrender, excluding the application fee.
 - If notice of withdrawal or surrender is received after the completion of the initial review: No refund.
- Application fee is not refundable at any time.

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NATIONAL ORGANIC STANDARDS BOARD FALL MEETING TO BE HELD VIRTUALLY

The National Organic Standards Board (NOSB) Fall 2020 Meeting will be held live online, instead of in-person. This allows the Board to safely deliberate in an open and public setting.

Online Meeting Details

- **Tuesday, October 20**, Noon–5:00 pm Eastern
- **Thursday, October 22**, Noon–5:00 pm Eastern
- **Wednesday, October 28**, Noon–5:00 pm Eastern
- **Thursday, October 29**, Noon–5:00 pm Eastern
- **Friday, October 30**, Noon–5:00 pm Eastern

Meeting materials including the agenda, public comment registration links, and other resources will be added to the NOSB Fall 2020 Meeting webpage as they become available. Please contact PCO for further information.

- All speakers making public comments must sign up in advance, and will be called on when it is their turn. Speakers will be notified by email of the commenting order.
- Members of the public will be able to hear the live comments, Board deliberations, and see all slides used. Only Board members may ask questions.

LIVESTOCK ADDED TO U.S./JAPAN AND CANADA/JAPAN ORGANIC EQUIVALENCIES

The United States and Japan have announced the expansion of their organic equivalence arrangement to include livestock products. The arrangement, which went into effect July 16, 2020, reduces costs and streamlines the process for anyone involved in the organic livestock supply chain by requiring only one organic certification. Japan is the third largest export market for the U.S. organic sector, buying more than \$50 million worth of U.S. grown and produced organic products last year. This expansion reduces costs and streamlines the process for the organic livestock supply chain. It will benefit U.S. organic farmers and ranchers and will give Japanese consumers greater access to sought-after American organic products.

FROM U.S./CANADA ORGANIC EQUIVALENCE

The Canadian Food Inspection Agency (CFIA) has revised their import policy for USDA certified organic products traded under the U.S.–Canada Organic Equivalence Arrangement (USCOEA).

As of April 30, 2020, all certified USDA organic products imported to Canada must be accompanied by an organic certificate that includes the following attestation statement: “Certified in accordance with the terms of the U.S. – Canada Organic Equivalency Arrangement.” This means that after certifiers verify compliance to the terms of the U.S.–Canada organic equivalence they must include the attestation statement on organic certificates for USDA organic products exported to Canada, whereas previously certified organic operators were allowed to include the attestation of other documentation (e.g. invoices, BOL’s).

UNITED STATES STREAMLINES ORGANIC TRADE WITH TAIWAN

USDA announced a new U.S.–Taiwan equivalence arrangement, effective May 30, 2020, that streamlines organic trade with Taiwan. The arrangement allows organic products certified in the United States or Taiwan to be sold as organic in either market. It also protects access for American organic farmers, ranchers, and businesses to this significant export market. Taiwan is estimated to be the fifth largest organic export market for U.S. producers.

The American Institute in Taiwan and the Taipei Economic and Cultural Representative Office in the United States signed and exchanged letters on behalf of the U.S. and Taiwan to establish the new organic equivalence arrangement. The arrangement covers certified organic products grown, produced or with final processing in the U.S. or Taiwan and eliminates the need for organic producers and processors to have separate organic certification to the U.S. and Taiwan standards, avoiding a double set of fees, inspections, and paperwork.

The U.S. currently maintains organic equivalence arrangements with Canada, the European Union, Japan, Korea and Switzerland.

NOP AND CBP ANNOUNCE THE DEPLOYMENT OF THE ELECTRONIC ORGANIC IMPORT CERTIFICATE

The organic sector of American agriculture has seen unprecedented growth over the last ten years. Sales of organic products in the U.S. continue to grow at a steady rate. With the increase in imports entering the U.S., the USDA continues to focus on maintaining the integrity of organic supply chains to strengthen farmer and consumer trust in the organic seal.

To address this growth, the National Organic Program (NOP) has launched a project to implement electronic organic import certificates. These certificates will increase the transparency and traceability of organic products by requiring import certificates for all organic imports.

Electronic organic import certificates are required by the 2018 Farm Bill and are closely connected with the Strengthening Organic Enforcement rule currently underway, which will modify the USDA organic regulations in many areas. This project involves close collaboration with U.S. Customs and Border Protection (CBP), organic certifiers, organic importers and exporters, and organic programs in other countries.

At the end of April 2020, the NOP and CBP announced the deployment of the electronic organic import certificate in CBP’s primary import system, the Automated Commercial Environment (ACE). This organic certificate was launched as an optional filing step, for now.

U.S. organic importers who wish to request the NOP Import Certificate (pdf) from exporters to include in their import filings may do so at any time. Trade filers who want to begin using and piloting this new feature should work

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with their Automated Broker Interface (ABI) software vendors to determine availability.

Customs brokers who start voluntarily submitting data now will help NOP and CBP ensure the new certificate does not slow trade for valid organic products.

Quality Update

Angela Morgan
Quality Systems & It Manager



PCO is one of the 47 US based USDA (United States Department of Agriculture) National Organic Program (NOP) accredited certifying agents authorized to certify operations to the USDA organic standards. In order to maintain that accreditation, certifying agents are audited by the NOP several times during their five-year accreditation cycle. After initial accreditation, renewal audits are conducted as close as possible to the five-year accreditation anniversary date, with a mid-term audit occurring 2–3 years from the date of accreditation renewal.

PCO's last accreditation renewal audit occurred in August of 2017 and PCO's midterm audit will be conducted this year, November 16-20, 2020. During a typical mid-term audit, an audit team from the NOP's Accreditation Division reviews PCO's key certification activities, verifies the implementation and effectiveness of corrective actions, conducts witness audits and reviews audits onsite at various certified operations, interviews certification personnel, reviews certification files, and conducts any other activity as deemed necessary to assess PCO's compliance with the general requirements for accreditation as detailed in §205.501 of the USDA regulations to maintain continued certifier accreditation.

Given the unique and challenging circumstances of the current COVID-19 pandemic, PCO's mid-term audit will be a remote desk audit only, with the possibility of onsite witness audits at a later date. Prior to audit the NOP audit team will provide the assessment objectives, scope, and criteria of the audit and request the desired files for review. In preparation for the audit PCO will review key procedures/documents including, but not limited to:

- noncompliances/adverse actions
- inspector assignments and reports
- standard operation procedure completeness and process adherence
- personnel training and qualifications
- PCO organic certificates and addendums
- Quality and Certification Manuals

An internal audit will be conducted prior to the NOP mid-term audit to assess overall compliance and identify any areas for improvement or change. Additionally, all staff will

be given audit training to detail the audit process and staff expectations, and review audit best practice guidelines for professional and effective interactions and communication during possible staff interviews.

To have a successful audit with little to no noncompliances/findings PCO must meet the overall standards for the Certification Process as it relates to:

- New applicants – initial certification determination
- Continuing operations (i.e., annual updates, etc.) noncompliance/adverse actions
- Unannounced inspections conducted – 5%
- Material review process – allowed inputs
- Label review process – organic claims, seals
- International exports and imports – activities/oversight

As well as standards for Administrative Records and Processes:

- Quality Manual and Certification Program Manual – accurate, complete, followed
- Forms/templates used – relevant and available
- Annual reviews – completed, corrective actions implemented
- Training – External, Internal, Proposed, Completed

While there will be a lot to review, PCO is confident that our continued commitment to uphold our core values and maintain organic integrity will be evident and our accreditation will continue in good standing.

Marketplace

CROPS

PCO-certified organic baleage. Individually wrapped. 4 x 4 mixed hay. Wet first cutting, \$50/bale. Dry first cutting, \$30/bale. Jim Hepp. 570-746-1651. Bradford County.

Certified Organic Meadow Grass hay. Large square bales (3x7), clean, dry, and stored indoors. RFV 85. Great for horses or dry cows. \$75.00 per bale. Call or text: Cindy 717-476-1220. York County

PCO Certified Organic rye, cleaned and bagged. \$16 per bushel; quality discounts! Call or text: Fred Wadel 717-917-0156 Lancaster County.

EQUIPMENT

Farm cultivators for sale. Four and six rows; John Deere and IH, ready to go to work (both rebuilt). Contact Carl Modica for prices. 814-267-5640. Somerset County.

SERVICES

Ag plastic recycling. I can use black and white bunker covers, bale wrap, plastic twine, clear stretch film, greenhouse covers, flats, and pots. Call for details. 717-658-9660. Franklin County, PA.

LAND FOR SALE/RENT

Large amount of certified organic dairy farm for rent or sale. 70+ acres of pasture. Please contact 570-721-3605. Sullivan County.

Certified Organic Dairy Farm for Sale. Northern New York (outside of Watertown) 100 acres of certified and; 52 tie-stall barn. Consider a lease or to buy. Call 315-777-1510 – owner. Jefferson County.

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PCO Welcomes 3rd Quarter New Members!

NEWLY CERTIFIED ORGANIC

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Ammon Zimmerman
Winfield, PA

Amos King
Narvon, PA

Carl Modica Jr.
Berlin, PA

Circle H Farms LLC
New York, NY

Culton Organics LLC
Silver Spring, PA

**Cumberland
Commodities**
Danville, KY

Curtis Lehman
Fredericksburg, PA

**Curtis R. and Dorothy
L. Huber**
Mohnton, PA

David B. Yoder
Romulus, NY

David Longo
Rock Stream, NY

David R. King
Millersburg, PA

David Shetler
Hermon, NY

Dennis Weaver
Honey Grove, PA

Eli J. Wengerd
Whitehall, NY

Elmo M. Martin
Mount Joy, PA

Elvin L. Bullock
Wyoming, NY

Enos D. Wengerd
White Hall, NY

Ephraim K. Stoltzfus
Millersburg, PA

Evan Saylor
Honey Grove, PA

Gary Murphy
Excavating LLC (GME)
Owensboro, KY

Glenn Nolt
Kutztown, PA

Goshen Mill Farm LLC
Peach Bottom, PA

Harvey R. Byler
Bombay, NY

**Hemp Synergistics
LLC**
Pittsburgh, PA

Hempsylvania, Inc.
Drums, PA

Ivan B. Stoltzfus
Millersburg, PA

Jack Coates
Wyalusing, PA

James L. Stoltzfus
Homer City, PA

James Mullet
West Lafayette, OH

James R. Young
Antwerp, NY

John C. Erdley
Mifflinburg, PA

**John Shepherd &
Deborah Faltine**
Lenhartsville, PA

Johnathan Martin
Little Falls, NY

**Kauffman's Farming
LLC**
Reedsville, PA

Kevin Fox
Canandaigua, NY

LaBelle Farm Inc.
Ferndale, NY

Lael Stutzman
Millersburg, OH

Lamar Hess
Selinsgrove, PA

Lavern Zook
Kreamer, PA

Laverne Stoltzfus
Honey Brook, PA

Leon Ray Zimmerman
Kreamer, PA

Leroy Zimmerman
Rock Stream, NY

Locust Farm
Gilbertsville, NY

Luke Eby
Mount Joy, PA

Lyndon Steiner
Shiloh, OH

Manna Organics, Inc.
Newark, NJ

Mari-Jon Farm
Christiana, PA

Marvin D. Herr
Mifflinburg, PA

Matthew J. Givens
Laurel, DE

Melvin Stoltzfus
Oxford, PA

Michael A. Knauer
Cambridge, MD

Michael L. Gorrell
New Berlin, NY

Milky Way Trading
Manassas, VA

Nathan H. Kilmer
Watkins Glen, NY

**Natural Hope Herbals,
LLC**
Millersburg, PA

Nevin Steiner
Shiloh, OH

Penn Leaders
East Stroudsburg, PA

**Perrymint Tea & Herbs
LLC**
Essington, PA

**Persimmon Hollow
Organic Farm LLC**
Dornsife, PA

Peter J. Markel
Breinigsville, PA

Pocono Organics LLC
Long Pond, PA

Primeraw Foods
Woodland Park, NJ

Reuben Burkholder
Rushville, NY

Robert K. Taylor
Harrington, DE

**S&B Livestock Dealers
Inc.**
Herndon, PA

Samuel J. Raber
Whitehall, NY

Schlappich Farms, Inc.
Mohrsville, PA

**Smith Brothers Poul-
try LLC**
Middleburg, PA

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Creamery LLC**
Killbuck, OH

Stuart A. Mathias
Hamburg, PA

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**True Vine Organics
LLC**
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Wayne Hook
Kreamer, PA

Wild Fox Farm LLC
Barto, PA

**Wild Fox Provisions
LLC**
Barto, PA

**William F. Willard
Farms LLC**
Frederick, MD

Windflower Farms LLC
Valley Falls, NY

ORGANIC PLUS TRUST CERTIFIED

Adam Young
Antwerp, NY

Blendhouse
Reading, PA

Curvin Eby
Hagerstown, MD

Daniel S. Esh
Fort Plain, NY

Eli E. Fisher
Sprakers, NY

Ervin J. Mast
Bombay, NY

Harvey R. Byler
Bombay, NY

James R. Young
Antwerp, NY

James W. Weaver
Geneva, NY

Jason Schell
Philadelphia, NY

Kenlin Eby
Hagerstown, MD

M & W Dairy
Antwerp, NY

Nathan Kilmer
Watkins Glen, NY

Penn Dairy LLC
Winfield, PA

Ronald Holter
Jefferson, MD

Schell Farms
Philadelphia, NY

Tyler Perrigo
Gouverneur, NY

ADVOCATE

Kelley Maguire
Milroy, PA

BUSINESS

Adisseo
Alpharetta, GA

Ag Source LLC
Mifflintown, PA

AgriDynamics
Martins Creek, PA

Compostech LLC
Honey Brook, PA

DBC Ag Products
Lancaster, PA

Douglas Plant Health
Princeton, IL

Herr Farm Products
Peach Bottom, PA

Moreda Valley Dairy
Cotati, CA

**Probiotech
International Inc**
St-Hyacinthe, Quebec

Southland Organics
Bogart, GA

Event Calendar

OCTOBER

Oct. 19, Oct. 26, Nov. 2

6:00–7:30 pm
Organic Growers' Research and Information-Sharing Network
3 Sessions – Growing and the Production of Grain Crops
Nofan.org

October 20 & 22

National Organic Standards Board – Virtual Public Comment Days
ams.usda.gov

October 22

10:00–11:45 am
Leading with Change: Managing Change on Your Dairy – Virtual Roundtable Meeting
Center for Dairy Excellence
centerfordairyexcellence.org

October 23 & 24

10:00 am–5:00 pm
Grow Your Own Mushrooms at Home: Inside & Outside
Quiet Creek Herb Farm
Brookville, PA
Pasafarming.org
814-349-9856

October 27

9:30 am–4:30 pm
Tractor Safety & Operation
Lundale Farm Preserve
Chester County, PA
Pasafarming.org
814-349-9856

October 28–30

National Organic Standards Board Meeting – Online Meeting
ams.usda.gov

October 31

Deadline for cost-share application
Check with your local USDA Farm Service Agency for submission requirements

NOVEMBER

November 4–8

35th Sustainable Agriculture Conference – Virtual event
Carolina Farm Stewardship Association
carolinafarmsteward.org

November 5

2:00–3:00 pm
Webinar: Vegetable Nutrient Quality and Soil Health in the Vegetable System Trial, 4th Season Updates
Rodaleinstitute.org
610-683-1400

November 10

7:00–8:30 pm
Farm & Land Transition Strategies
Pasafarming.org
814-349-9856 x709

November 12

2:00–3:00 pm
Webinar: Impact of Management Practices on Colored-Potato Crop Nutrient Quality and Soil Health
Rodaleinstitute.org
610-683-1400

November 12 & 13

Organic Farming Conference
Mt. Hope Event Center
Mt. Hope, OH
Organicfarmingconf.com

November 26 & 27

Thanksgiving Holiday
PCO Offices will be closed

DECEMBER

December 1–4

Virtual Conference
Acres USA 2020 Eco-Ag Conference
ecoag.acreusa.com
800-355-5313

December 10

10:00 am–12:00 pm
Season in Review: Vegetable Farms
Pasafarming.org
814-349-9856 x707

December 24–January 1

Christmas–New Year's Holiday
PCO office will be closed

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STAY CONNECTED, VISIT:
paorganic.org

Rodale Institute's Organic Field Days

continued from page 11

in what inputs you can use, it is important to graft to manage soil-borne fungal, oomycete, bacterial and viral diseases.

In addition to grafting, Dan continues to care for the tomatoes during the growing season by pruning and trellising. Pruning is the clipping of the vegetative material and diverting the energy to the growing, fruiting and flowering area. It is important not to cut or bruise the growing tip and to only remove the suckers. Trellising holds the plant using string, metal or a cage-like structure. In the high tunnel at Rodale, a roller hook connects to a metal cable that runs along the top of the high tunnel. Additionally, a trellising clip is used to connect the plant to the string.

If you want to learn more about trellising, pruning, grafting, cover-cropping, no-till and more, make sure you check out our 2020 Virtual Field Day, which can be streamed by visiting: rodaleinstitute.org.



Interested in the work of Rodale Institute, but previously couldn't make it to Kutztown, Pennsylvania? Now's your chance to see Rodale's work firsthand from the comfort of your home. Only \$25 gives you exclusive access to hours of Organic Field Day content. Register here: rodaleinstitute.org/get-involved/visit/organic-field-day

Building Resiliency...Climate Change

continued from page 5

integrating perennial crops and habitat plantings, management-intensive rotational grazing, and crop-livestock integration.

NEW DIGITAL TOOLKIT FOR CLIMATE ADVOCACY

In April, OFRF launched a new **digital toolkit** on our website at ofrf.org that provides opportunities to learn, share, and help build the movement to create a more sustainable agriculture system. Our goal is to encourage more consumers to purchase organic food and increase demand so that together we can expand organic acres to:

- **Capture and store more carbon in the soil for longer.**

The most practical and cost-effective way to remove excess carbon (CO₂) from the atmosphere is through living plants and soils. While organic systems require some level of physical disturbance to control weeds, they eliminate synthetic inputs and can significantly reduce tillage. Reduced tillage, crop diversification, cover cropping, organic amendments, and sound nutrient management can enhance carbon sequestration and build climate resiliency in organic agricultural systems.

- **Release fewer greenhouse gases.**

Organic farmers do not use synthetic pesticides and fertilizers, one of the primary contributors of greenhouse gases. Healthy soils help crops obtain nitrogen, phosphorus, and other nutrients from organic soil organic matter. This reduces the need for fertilizers that can threaten water quality and minimizes the release of greenhouse gases from soils.

- **Help farmers and ranchers increase resilience to rising temperatures and intensified droughts and rain events that make it more challenging to grow crops and raise livestock.**

Healthy soils form the foundation of organic production. Healthy soils have good structure (tilth), which allows them to absorb and hold moisture, drain well, maintain adequate aeration, and foster deep, healthy crop root systems. Such soils sustain crops through dry spells, require less irrigation water, and undergo less ponding, runoff, and erosion during heavy rains.

The initial calls-to-action are to **share the toolkit** and **buy organic**. In the coming months, we will be offering opportunities to join us as an advocate for programs and policies that encourage the growth of the organic industry on a federal level.



As a science-based organization, the Organic Farming Research Foundation (OFRF) works to foster the improvement and widespread adoption of organic farming systems by cultivating organic research, education, and federal policies that bring more farmers and acreage into organic production.

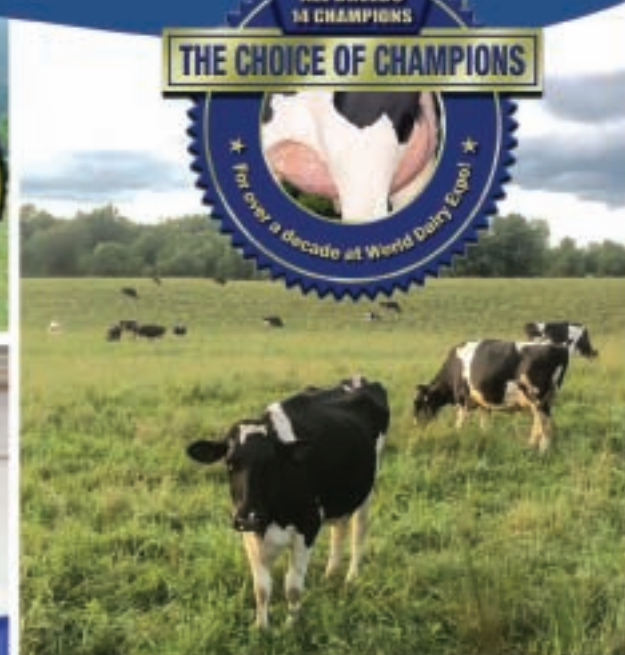
OFRF regularly surveys organic farmers about their experiences, challenges, and information needs, using that feedback to determine research funding priorities. Survey results are published in OFRF's National Organic Research Agenda, which has been an invaluable resource for ensuring research funding is relevant and responsive to the needs of organic producers, while also identifying gaps where additional investment is necessary. We are currently surveying farmers across the U.S. and will publish an updated report in 2021.

OFRF grant funding has advanced scientific knowledge and improved the practices, ecological sustainability, and economic prosperity of organic farming. While modest in size, OFRF grants have played a crucial role in advancing the careers of young scientists, many of whom have subsequently advanced to influential research, teaching, and public-service careers in organic agriculture.

All of OFRF's research results and educational materials are available at ofrf.org. For updates on the latest in organic research, education, and advocacy, sign up for our monthly newsletter.

"... good news for the rest of her lactation!"

— Bryce Windecker



WINDEX FARM, FRANKFORT, NEW YORK
Dale, Deb, Bryce and Kayla Windecker
100 Registered Holstein cows
BAA 107.6, 7 EX, 47 VG, 28 GP
65 lbs/cow/day, SCC 110,000
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Photos: Bryce, Deb and Dale Windecker with hay equipment. Bryce at 2019 Big E with his bred-and-owned show cow from a top cow family Windex Fremont Dandy EX94. She was nominated Jr. All-American 5-year-old.

"If you can get a cow rolling along when she freshens, it's good news for the rest of her lactation. That's why we use Udder Comfort™ on every fresh cow, especially heifers, 2x/day for 5 days after calving," says Bryce Windecker, cowman in charge of the breeding program at Windex Farm, Frankfort, N.Y. He transfers to Cornell this fall.

Bryce explains how his family has used Udder Comfort for 10 years, since before being certified organic in 2017: "This product is better than anything else. It's real prevention. We use the yellow sprayable Udder Comfort and we like to cover the udder on a fresh animal.

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