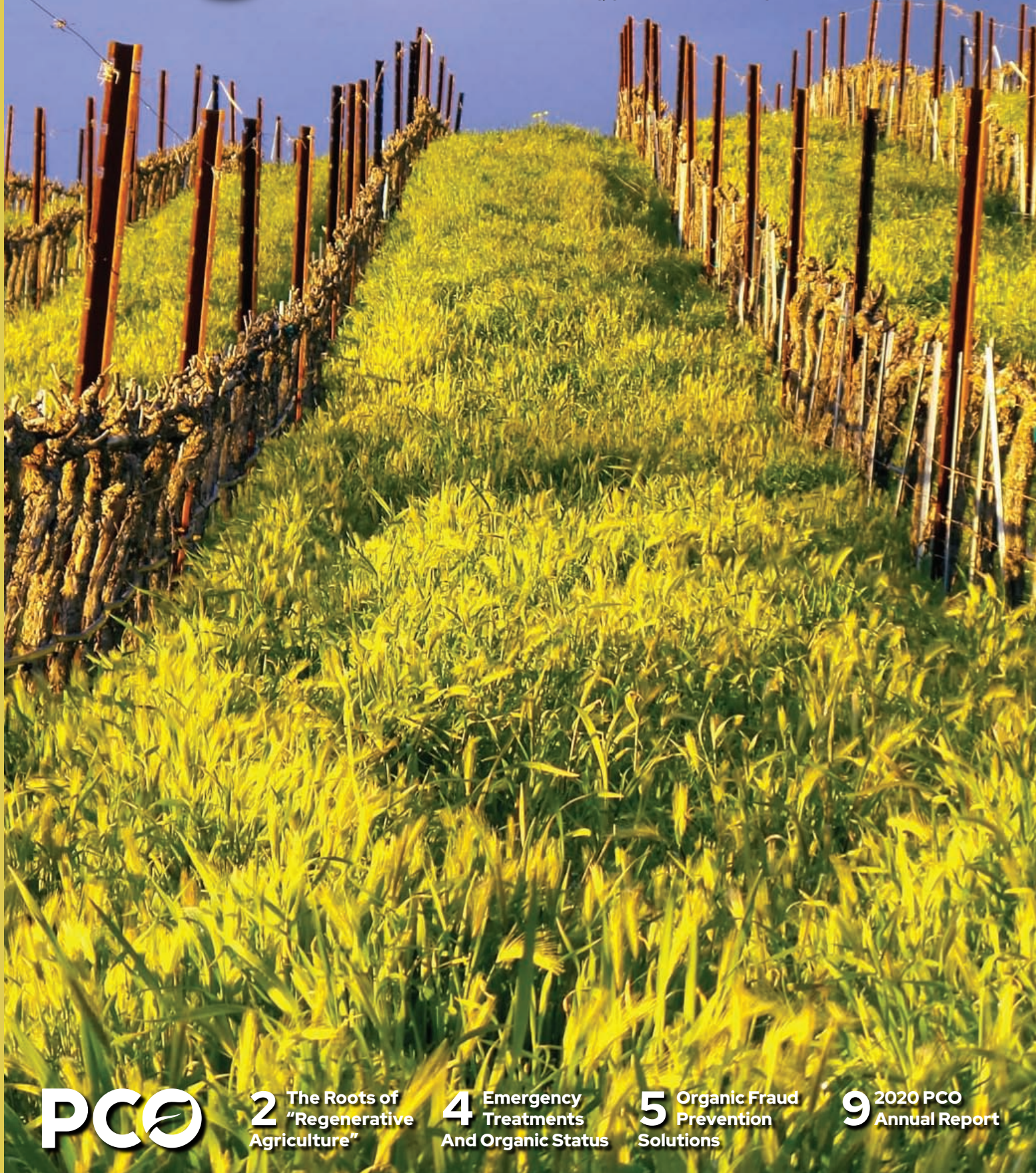


# Organic Matters

QUARTERLY NEWSLETTER • SUMMER 2021



**2** The Roots of  
"Regenerative  
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**4** Emergency  
Treatments  
And Organic Status

**5** Organic Fraud  
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**9** 2020 PCO  
Annual Report



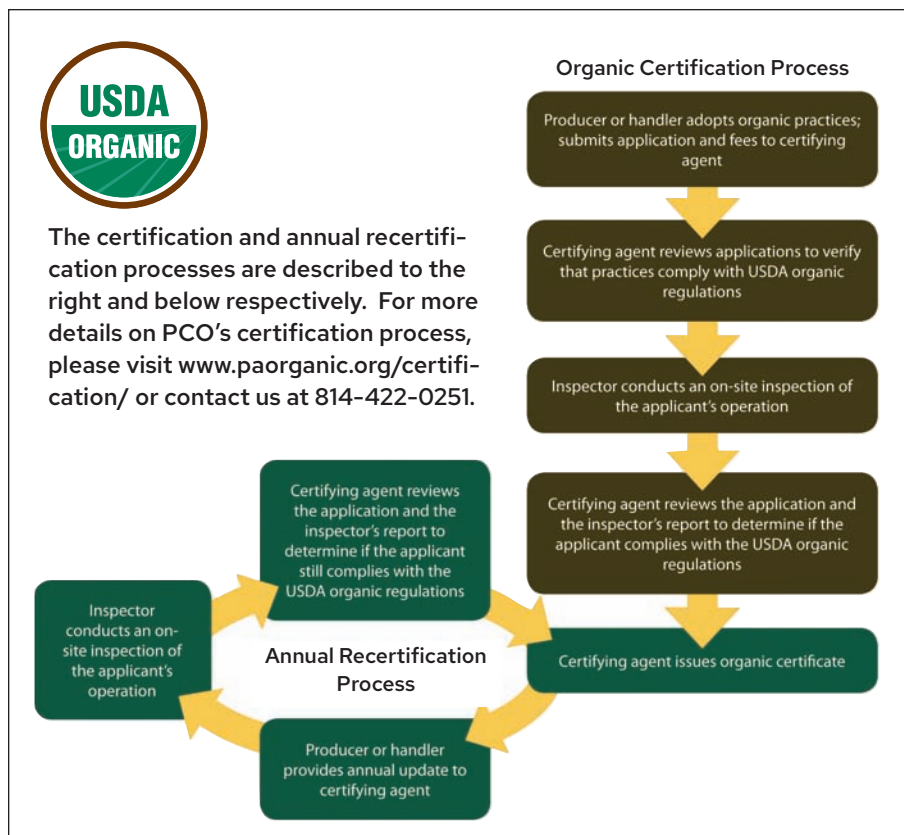
# Organically Speaking



It's finally summer, and like you, this time of year finds the staff at PCO doubling down on all of the things that make an operation successful: planning, communication, being prepared, customer service, monitoring, acting in the right time, making corrections, and setting up the right environment and amount of resources for growth. While you are hard at work on your land and in your facilities, here's a little bit more information about what is happening within PCO.

Our key job is to uphold the integrity of the USDA standard, which takes a lot of expertise and review hours. While we **grow our staff**, we need to take time to train them well to serve you and do a quality job with your files. We also have our own accreditation to track and maintain through audits and quality control, as well as infrastructure to maintain and upgrade, such as our new database management system, which staff, inspectors, and clients continue to learn how to navigate in order to gain efficiencies and add functionality. We also reach higher than the basic standard with add on services like the grass-fed Organic Plus Trust (OPT) certification.

PCO puts significant effort into creating a culture that actively supports our values, resulting in an increasingly inclusive and productive workplace and board environment, facilitating and guiding **organizational growth**. At PCO we strive to support a work culture that promotes purpose, caring, and results. 2021 brought a new approach to this commitment for our staff, including monthly training for all managers, monthly full staff meetings, monthly meetings of our core values group, and DEI training throughout the year for both our staff and board. All of this work results in smoother day-to-day interactions and more informed and effective service to our clients.



Our staff serves on boards and committees throughout the **growing organic community**, including our Certification Director Kyla Smith currently representing all USDA Accredited Certification Agencies with a five year term on the NOSB (National Organic Standards Board), our Materials Manager Jen Berkebile currently serving as Vice Chair of the ACA (Accredited Certifiers Association), and one of our longest standing Certification Specialists Heather Donald serving as Secretary of IOIA (International Organic Inspectors Association). Staff and external stakeholders all benefit and grow from these exchanges of information and opportunities to serve, and we return that knowledge to you in our work, both with you and on your behalf.

This summer and into fall, we will resume more of the traditional outreach

and education work, which often results in **growth through partnership** with the familiar organizations that provide those services in the highest quality ways, most notably Pasa, Penn State, and Rodale Institute.

We also support legislative and funding opportunities that support organic, and we need your voice to amplify those efforts. Please watch this space and our monthly e-news and help us push for more funding, better standards, and additional support for small and mid-size operations so that we can all **grow together**.

*Diana J. Kobus*

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Angela Morgan, *Quality Systems & IT Manager*  
Garrick McCullough, *Systems Administrator*

**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

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Cover photo: Tablas Creek Farm cover crop at sunset, Courtesy of the Regenerative Organic Alliance.



# Getting to the Roots of "Regenerative Agriculture"

## PCO to offer add-on Regenerative Organic Certification in 2022

*Tablas Creek Farm, Courtesy of the Regenerative Organic Alliance.*

WRITER: EMILY NEWMAN, ORGANIC FARM CONSULTING SERVICES PROGRAM MANAGER, RODALE INSTITUTE

"Regenerative" is a buzz word in agriculture these days. It refers to a type of farming that goes above and beyond "sustainable" practices and actively regenerates, or restores, the natural resources to support a healthy, thriving farming ecosystem. Although the word regenerative has only entered the mainstream in recent years, the idea of regeneration has been around a lot longer.

Regenerative agriculture may seem like a revolutionary practice, but this type of farming has been practiced by Indigenous people for centuries, and is deeply rooted in the history of agriculture. Diversified crop rotations, interseeding, and polycropping are common practices among organic and regenerative farms. Iroquois farmers planted squash, beans, and corn together in one system, calling it the "Three Sisters" and employing a polycropping system in their farm production.

Highly integrated systems are also becoming more popular. Many farmers are integrating concepts like permaculture or agroforestry into their farm designs, another approach informed by Indigenous knowledge. Native Americans often mimicked nature by planting legume cover crops to provide a nitrogen source in their cash crop and grazed animals in wooded areas. Native Americans also used mounding of soil to preserve water: the Hohokam Tribe in Arizona dug irrigation canals and Pueblo people built dams to reduce ruts and disturbance to the soil surface.

Diversified crop rotation, agroforestry design, water management and other practices, which are now fixtures in organic agriculture, have been married together under the term "regenerative agriculture." Robert Rodale, son of J.I. Rodale and head of Rodale Institute after J.I.'s passing in 1971, champi-

oned regenerative farming methods before the USDA organic standards and certification was launched. Bob's original philosophy of regenerative encompassed a broader spectrum of human values than was present in farming during the period.

Together with his daughter, Maria Rodale, Bob penned the 7 principles of regenerative as he saw them, coining them the "7 tendencies towards regeneration in agriculture, communities and personal spirit:"

**Pluralism:** Increasing diversity of plant species, business, people, culture, personal experiences, capacities, opportunities, and openness to new experiences.

**Protection:** More surface cover of plants reducing erosion and increasing microbial populations' resistance to economic and cultural fluctuations, which increases employee retention, community stability and improvement of personal hardiness to withstand crisis and boost body's immune system.

**Purity:** A world free from chemical fertilizers and pesticides, without pollution, and an end of detrimental habits, increasing the potential for growth, happiness and success.

**Permanence:** Increased perennials and established root systems. Businesses begin to contribute more to their community and build a positive, personal spirit to provide deeper meaning to life.

**Peace:** Disruption of past patterns of weed, pest and disease interference, reduction in patterns of violence and crime, and replacement of anger, fear and hate with tolerance, compassion and understanding.

**Potential:** Nutrients become more available for use by plants, and more resources and money are available to more people. Positive qualities and resources are easier to access for people in the community.



**Progress:** Continuous improvement of soil structure, water retention capacity, and health and well-being of the community. Capacity for well-being and enjoyment increases.

Beyond Indigenous practices and Rodale's tendencies, there are several other schools of thought on regenerative agriculture. Many other farmers and agricultural professionals have contributed to modern day regeneration: Ray Archuleta in his book "Unlocking the Secrets of the Soil", Gabe Brown's treatise "Dirt to Soil," Trey Hill of Harborview Farms and his work on carbon payments, and Rick Clark's no-till organic farm in Indiana are just a few of the ones that come to mind. Although each grow different crops in different regions of the United States, all share very similar practices: reduce tillage events and keep the soil covered.

One important differentiation? Not all these farmers are certified organic.

This is where modern day, mainstream "regenerative" agriculture and USDA Certified organic farming start to diverge: the use of genetically modified organisms ("GMOs") and synthetic chemicals. Certified organic farmers are barred from using prohibited synthetic fertilizers, pesticides, and fungicides that are not listed on the National List of Allowed and Prohibited Substances, and the National Organic Program specifically excludes the use of GMOs in organic systems.

This means that certified organic farmers are using a cultural, physical, and biological approach to managing pests, weeds, and diseases within their systems, instead of relying on a chemical approach. "Regenerative" farmers, however, may utilize GMO seed that can survive the spraying of a harsh broad-spectrum pesticide and may terminate their cover crops, pastures or hay fields utilizing an herbicide.

So how can this be? How can "regenerative" farmers be utilizing practices prohibited in organic but still be able to claim they are "regenerating" an ecosystem? It comes down to the fact that "regenerative," unlike organic, is not a federally regulated term. Just as you walk down the aisle at the grocery store

and see "all-natural potato chips" dripping with saturated fats, or "natural ice cream" laced with preservatives, a farmer or farm can claim they are regenerative without anyone verifying that their practices follow a standard of conformity.

Enter the Regenerative Organic Alliance.

Established by a group of farmers and agriculture advocates including Rodale Institute, Patagonia, Dr. Bronner's, and more, the Regenerative Organic Alliance (ROA) aimed to marry the historical context of the term regenerative with steadfast organic regulations. ROA "exists to heal a broken system, repair a damaged planet, and empower farmers and eaters to create a better future through regenerative organic farming." In 2017, the Regenerative Organic Alliance launched Regenerative Organic Certified™ (ROC), which builds upon the baseline of USDA Certified Organic to reach a new, higher certification: regenerative organic. Like organic, ROC is a robust certification program that requires farmers and producers to meet a set of standards revolving around three pillars: soil health, animal welfare, and social fairness.

For the soil health pillar, farmers and producers are required to be certified organic by an NOP-accredited certification agency or equivalent program, such as EU or COR. In addition to maintaining and improving soil health as well as implementing a crop rotation plan as required by the NOP standards, farmers are required to reduce tillage within their systems, and aim to create a closed-loop nutrient system where reliance on outside minerals is not required. This pillar places regenerative organic agriculture as a solution for climate change by increasing carbon sequestration on farms.

The animal welfare pillar also requires livestock farmers to meet a baseline of being certified organic by an NOP-accredited certification agency or equivalent program, such as EU or COR as well as certified in accordance with one of three existing animal welfare programs: Global Animal Partnership, Certified Humane or Animal Welfare Approved. As compared to the organic standards, the animal welfare pillar has stricter and

*continued on page 21*



*Left: Apricot Lane Farms, Courtesy of the Regenerative Organic Alliance. Right: Legend Organic Farm, Courtesy of the Regenerative Organic Alliance.*

# Emergency Treatments And Organic Status: Considering All Options

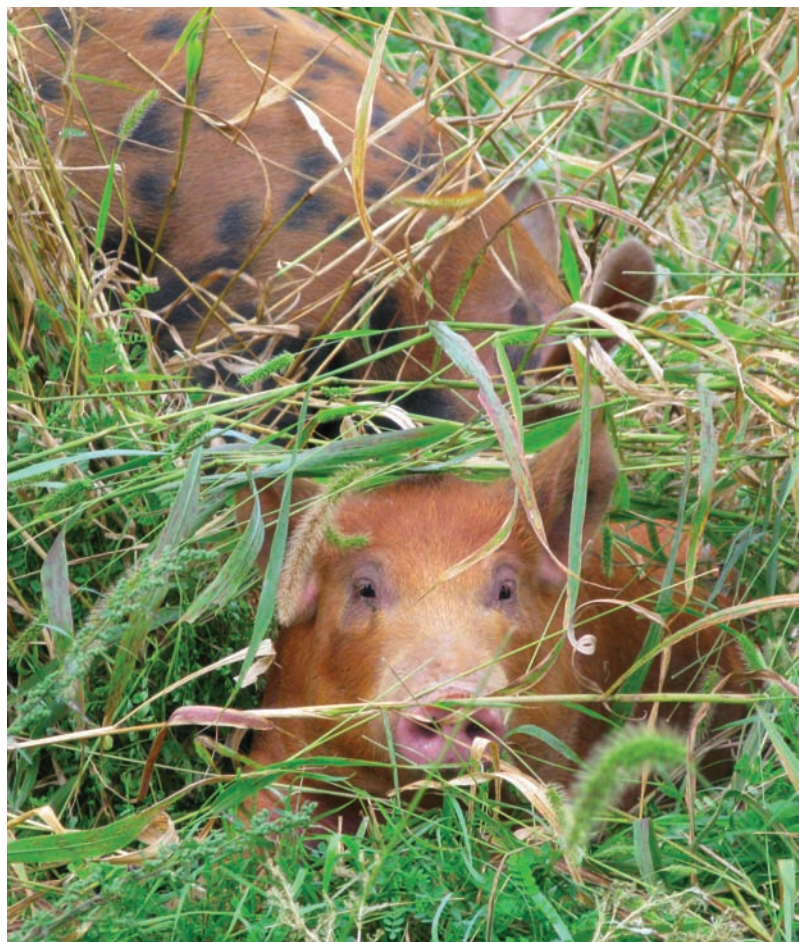
*When animals fall ill, restoring health  
trumps preservation of organic status*

JUSTINE COOK, CERTIFICATION PROGRAM ASSISTANT  
MANAGER

**P**CO was contacted last summer by a newly certified operator who was apologetic for using a prohibited medical treatment. The operator explained that they had administered an antibiotic to a calf who was suffering from pneumonia, acknowledging that they understood the animal was no longer organic. It was explained that they were working with a vet and had attempted two organic-compliant treatments before resorting to the antibiotic. When they learned that, although the calf did lose organic status, the actions taken were entirely compliant – the operator expressed surprise. A sometimes-overlooked provision in the organic livestock healthcare regulations is that **organic farmers are indeed required to take all measures necessary to restore an animal to good health, even if those measures result in the animal no longer being eligible for organic certification.** NOP regulations specify that organic livestock producers must not withhold medical treatment from a sick animal in an effort to preserve its organic status.

Preventative management is key for organic livestock producers: good genetics, sanitary living conditions, good nutrition, opportunities to exercise, use of vaccines, and reduction of stress. And while there is no one approved way to raise animals or one recommended type of housing, the livestock living conditions and health care offered on an organic farm must fulfill those requirements. When an animal does fall ill despite preventative practices, there are a number of treatments that have been found compliant with NOP regulations; it does not follow, however, that they are guaranteed to restore an animal to health. When you are looking at an allowed materials list, the list only tells you whether products are compliant and any restrictions for how they can be used. It is up to your expertise, and that of your vet, to determine whether the compliant treatment is appropriate for relieving the illness or injury. And if methods acceptable to organic production fail, it is required that all appropriate medical options, even those that will lead to loss of organic status, are explored in your efforts to restore the animal to health.

If an animal does lose organic status, there are a few options that depend on the type of livestock and how Origin of Livestock requirements apply. The first step for any treated animal



is clearly identifying them to prevent commingling issues (e.g. milk from a non-organic animal cannot go into the bulk tank) or sale as an organic product (e.g. a treated feeder pig cannot be sold as organic). An option that may apply to certain livestock is keeping the treated animal as breeding stock – if the breeding stock is managed in compliance with all applicable regulations during the last third of the gestation period, their offspring would be eligible for organic certification. And if organic management is continued during the nursing period, their milk can also be fed to young stock. It is vital to note that organic management of breeding stock must be verifiable in your records, including pasture rule requirements during the grazing season for ruminants. Another potential route could be to keep the animal for family use (e.g. milk, meat). These two options would require a discussion with your certification specialist and the submission of a plan to ensure commingling and contamination is prevented and that the animal is clearly identifiable and auditable. And, finally, an option considered compliant for all livestock is to mark the treated animal and sell as non-organic.

At inspection, when health care records are reviewed, expect to discuss mortalities and efforts made to prevent illness and death. And if a prohibited medical treatment is administered, make sure that the treatment is documented, the animal is identified, and report it to your certifier. If you have any questions about the application of livestock regulations, contact your certification specialist to discuss the details.



# Organic Fraud Prevention Solutions

## PCO signs on to be a Supporting Partner to the OTA program

Between 2010-2017, several imports of fraudulent grains and commodities entered into our domestic organic system, jeopardizing our supply chain. To mitigate fraud and heighten enforcement, the USDA received provisions in the 2018 Farm Bill that were earmarked for expanding resources and authority to improve supply chain traceability and data collection. The integrity of the USDA Organic Seal is paramount to our industry. The consumers of our products want to have confidence in the way they were grown, raised or processed. It takes a collective effort to stop organic fraud (both domestically and abroad) by protecting the organic system we work hard to build.

In early 2019, the Organic Trade Association (OTA) launched a program to help minimize or eliminate organic fraud in the supply chain. The **Organic Fraud Prevention Solutions** program is an online training course that helps organic businesses put systems and measures in place that support the integrity of the organic supply chain. This volunteer program is open to organic businesses who are certified organic or listed by a USDA recognized Material Review Organization.

The program is not a certification or verification program. It is a quality assurance program designed to complement and reinforce USDA's organic standards. PCO has signed on to be a supporting partner of this OTA program because we stand behind our commitment to uphold our mission to ensure the integrity of organic products. As a supporting partner, we will educate our clients on the program benefits and connect you to online training resources. If interested, you would enroll directly with the OTA who will take you through a step-by-step



*A supporting partner is a stakeholder in the organic industry who is committed to organic integrity and fraud prevention, and not otherwise eligible to enroll directly in the program. Supporting partners are well versed in the Organic Fraud Prevention Solutions enrollment process, developing and evaluating Organic Fraud Prevention Plans, and are committed to promoting Organic Fraud Prevention Solutions enrollment to their clients and network. Online trainings are required for this role.*

process to help you develop your organic fraud protection plan. These steps will give you an opportunity to examine your vulnerability and risk and design preventative measures to protect your business supply chain. Like other quality assurance programs, there is an annual fee based on a sliding organic sales income scale. However, as the program recognition grows, it will enhance business-to-business marketing while helping with source procurement.

As the USDA continues to move forward on their largest piece of rulemaking since the National Organic Program's inception of the organic regulations, the Strengthening Organic Enforcement (SOE) proposed rule addresses the need to mitigate fraud in the organic industry. As part of the rulemaking, SOE will ensure operators:

- **Maintain records that document a product's source and chain of custody across the supply chain.**
- **Clearly identify products as organic on all records and labels.**
- **Document the monitoring practices used to prevent fraud and verify suppliers and products.**

The OTA's program will help you prepare for the implementation of the SOE rulemaking.

If you are interested in learning more about Organic Fraud Prevention Solutions program and exploring whether it is right for your operation, the OTA is holding information sessions on the following dates in 2021: August 9, September 7, October 3, November 8, December 13.

All sessions will take place from 2:00-3:00 pm ET. To participate in these live sessions, RSVP to Adrienne Messe at [amesse@ota.com](mailto:amesse@ota.com)

**PCO**  
**A Full-Service Certification Agency**

USDA ORGANIC  
CERTIFIED GRASS-FED ORGANIC DAIRY

*"Great certifying agency that is small enough to be able to have a personal feeling, but large enough to give you great service!"*

# Spring 2021 NOSB Meeting Recap

## Paper pots, biodegradable mulch and ion exchange discussed

JEN BERKEBILE, MATERIALS PROGRAM MANAGER

*During the last two weeks of April 2021, the National Organic Standards Board (NOSB) met remotely to address several issues in the organic industry. The NOSB is a volunteer board made of 15 members who make recommendations to the National Organic Program (NOP). Recommendations may be developed into proposed rules by the NOP, and they may be incorporated into the regulations if they become final rules.*

*The NOSB typically meets twice per year in various locations around the United States. During meetings, the NOSB listens to public comments, discusses agenda items, and then votes on recommendations to the Secretary in a public forum. The spring meeting, like the two meetings before it, was held remotely due to travel limitations caused by COVID-19.*

This spring's NOSB meeting was notable because it was PCO Certification Director Kyla Smith's first meeting as a board member. Kyla was appointed to fill the sole USDA Accredited Certifying Agent seat. Kyla's 17 years of experience with PCO and extensive knowledge of the organic regulations was apparent during this NOSB meeting, as she contributed to the lively discussion of several topics.

One of the main duties of the NOSB is to review materials and recommend changes to the National List of Allowed and Prohibited Substances, the section of the organic regulations related to input materials. The NOSB makes recommendations to the NOP on whether input materials should continue to be allowed or prohibited or should be newly allowed or prohibited. The spring 2021 meeting represented the first of two discussions for these materials, during which information is solicited from the public. The NOSB will discuss and vote on these materials at their fall 2021 meeting. Notable materials under sunset review include chlorine materials (calcium hypochlorite, chlorine dioxide, hypochlorous acid, and sodium hypochlorite) for crop, livestock, and handling uses; calcium borogluconate and calcium propionate for treatment of milk fever; and nutritive supplements for livestock health care (including injectable trace minerals, vitamins, and electrolytes).

The NOSB also voted on several petitions. Paper was petitioned to be allowed for use as a crop production aid. Paper pots systems have become popular among small scale farmers as a way to more efficiently transplant, and organic stakeholders have shown their support for the allowance of this use for paper. As such, the NOSB voted to add a definition of "paper-based crop planting aid" to §205.2 of the organic regulations, and to add an allowance for paper-based crop planting aids, as

***NOSB voted to add a definition of "paper based crop planting aid" to 205.2 of the organic regulations, and to add an allowance for paper-based crop planting aids, as defined at 205.2 and made of virgin or recycled paper without glossy paper or colored inks, to the crops section of the National List.***

defined at §205.2 and made of virgin or recycled paper without glossy paper or colored inks, to the crops section of the National List. A proposal to amend the §§205.2 and 205.601 will be sent to the NOP for formal rulemaking.

The NOSB also entertained a petition to amend the listing for biodegradable biobased mulch. There is support for more flexibility in the allowance for biobased mulch film, which has led the subcommittee to a recommendation to amend both the definition of "biodegradable biobased mulch film" and the National List annotation. Ultimately, however, the NOSB voted to send this petition back to the crops subcommittee for further work. This material is expected to be on the agenda again at future NOSB meetings.

The NOSB also voted to accept a proposal on ion exchange filtration, a type of food filtering process that certifiers have inconsistently allowed. The proposal discussed the complications surrounding this type of filtering, and sent the proposal forward to the NOP for next steps. Finally, the NOSB discussed, but did not vote on, several petitions, which include topics such as ammonia extracts, kasugamycin, zein, the annotation for fish oil, and excluded methods.

For more information on any of the above topics, visit [www.ams.usda.gov/event/national-organic-standards-board-nosb-meeting-crystal-city-va-0](http://www.ams.usda.gov/event/national-organic-standards-board-nosb-meeting-crystal-city-va-0) or contact Jen ([jen@paorganic.org](mailto:jen@paorganic.org); 814-422-0251 ext 209) or Kyla ([kyla@paorganic.org](mailto:kyla@paorganic.org); 814-422-0251 ext 216) at the PCO office.

All PCO certified operations are encouraged to participate in NOSB meetings. The NOSB relies on comments from all organic stakeholders, including certified operators, to determine what recommendations to make for newly allowed materials and new regulatory requirements. If you are interested in participating, you can attend the future meetings in person to give oral comments, you can submit written comments, or you can give oral comments over the phone or on the computer during the comment webinar. The next NOSB meeting will be held in person October 19-21, 2021, in Sacramento, California. Additionally, public comment webinars will be held on Wednesday, October 13, and Thursday, October 14, 2021. For more information about this meeting, visit [www.federalregister.gov](http://www.federalregister.gov). Contact Jen at the PCO office for help with developing and submitting public comments.



# Honoring the Life of Jonas Stoltzfus, a Founding Farmer of PCO



**O**n March 25, 2021 Jonas “Joe” King Stoltzfus died as a result of multiple brain tumors. Our thoughts are with his wife, Judy, their children and extended family. Jonas and Judy, founding farmers of PCO, served as pillars of our sustainable agriculture community. Jonas’ contributions to the farming community were great and he will be deeply missed.

Over the years, Jonas served in leadership roles in many different organizations, including the Blain Lions Club, Perry County Fair Board, Pasa Sustainable Agriculture, the 4H Livestock Club and many others.

A poet with a big heart, Jonas was known for his passions of beekeeping, organic farming, land preservation and soil conservation, beef and broth production, and steel fabrication. When he wasn’t enthusiastically sharing his wisdom or poetry with others, he loved to generate creative solutions to a wide range of problems.

In reflecting on Jonas’s passing, PCO staff member Sabine Carey shared this: “Jonas frequently opened our PCO

meetings or field days with a blessing, an original poem. His presence at our meetings always set a tone of gratitude and generous willingness to share and learn. His detailed farm life observations and amazement at the wonders of nature inspired many. It was always a joy to inspect his farm, sit and have tea with him and Judy, and hear about his latest efforts to not only work on building soil and improving water quality on their own farm, but also his efforts to reach out to other farmers and help them along the path to more holistic farming methods.”

Organic inspector and organic farmer, Lyn Garling, recounts her first meeting with Jonas: “I remember well my first encounter with Jonas Stoltzfus when I arrived to inspect their farm for organic certification. We sat in his kitchen with sunlight streaming in. Jonas talked about his questions and ponderings about how better to understand, engage and live within nature’s magical provenance; writing poetry; the specific personality of their cat...and much more. Eventually we got into his beat-up pickup and started straight up the hill into his small grain

field overlooking the whole farm, back down to the fat cattle, out to the fields in the shade by the stream. The whole time Jonas quietly and humorously commented on his knowledge of each of these places/beings, and his hopes and dreams for making the farm more ecologically-sound, more soulful, more deeply beautiful. I thought – ‘I can’t believe I am being paid to spend time with this thoughtful, brilliant and gentle man. I would pay to be allowed to spend time with him!!’ Jonas’ time with us will never be forgotten and he will be sorely missed.”

## Small Stream Symphony

written on July 19th, 2005

by Jonas K. Stoltzfus

*It was one of those hard day nights  
Workin’ down here on the farm,  
Makin’ hay then haulin’ cattle  
Finished ‘round two o’clock that morn  
Made my way with tired steps  
To the cellar door, to quit,  
Wife and most of Perry, sleepin’  
When I heard the sound of it  
Sounded like the bass drum section  
Of a local country band.  
They were really goin’ at it  
Really stirrin’ up the land.  
I was listenin’ to the music  
Comin’ on down in the creek  
Of the bullfrogs, ‘bout a dozen  
Just a singin’ and drummin’ away.  
What a beautiful neat endin’  
To the labors of the day  
Stood and listened as he,  
Must a been , granddaddy of ‘em all,  
Gave a long deep Haaaaarrumpff,  
A bass drummer soundin’ call  
Then another echoed double haarrumpff,  
haarrumpff  
Just havin’ him a ball.  
Cross the road and up the creek  
A bunch harumpfin kept the beat  
Then the granddad starts again  
The whole scene a soundin’ neat.  
Took another moment listenin’  
To that small creek symphony  
Thinkin’ to myself, “you old bard”  
“what a lucky man is thee”.*

*Donations may be made in Jonas’s memory to Pasa Sustainable Agriculture or the Rodale Institute.*

excerpt taken from online obituary; ([www.pennlive.com/perry-county-times/2021/04/perry-county-obituaries-april-17-2021.html](http://www.pennlive.com/perry-county-times/2021/04/perry-county-obituaries-april-17-2021.html))



# President's Message



## ANDREW SMYRE, PCO ADVISORY BOARD PRESIDENT

*Andrew is the owner of Lazy Dog Farm and the Head of Grain Sales and Agronomy at Belltown Farms.*

Summer is here! It seems like the first half of 2021 has gone by quickly. Like many of you I have been busy getting my crops planted and taking advantage of the longer days. I hope you are enjoying your time back in the fields and on the land you steward through organic practices.

As part of my work with Belltown Farms, I travel to various regions in the Upper Midwest, Mid-Atlantic and the Northeast to visit transitioning grain farms. I am attentive to the conversations and listening to issues that affect each operation. I have been having discussions with certifiers from all over the country, listening to their process in order to better understand the landscape of services provided by other certification agencies. As board members, we recognize you have a choice in certifiers and our goal is to continue to make PCO a top-tier certifier that meets your needs. We will stay competitive in both our services and fees.

Ensuring integrity is an important part of PCO's mission. As organic products continue to command higher price points in the marketplace, we all need to do our part to mitigate fraud and uphold integrity in our supply chain. The organic grain sector was hit hard by past fraudulent activity, especially within the import market. I believe with the National Organic Program proposed rule to strengthen organic enforcement we will see a bigger shift in our collective effort to build more consistency in the handling of organic products – from production to market. With import database improvements and stronger traceability,

we hope customers and end users will continue to feel confident in the products that are certified under the USDA organic seal.

Over the past couple of years, the PCO Board has upheld transparency and integrity as values we bring to all of our conversations and decisions. It is a way for board members to feel respected and heard no matter where they stand on an issue. As we continue to think strategically about PCO's future and our role in the organic industry, it is important that these values become the metrics by which we assess our actions.

Our board is comprised of some very talented individuals with diverse backgrounds. Each year we welcome new members to our board. If you are passionate about organic agriculture and are interested in stepping into a leadership role with PCO, please consider nominating yourself or others in the industry you deem ready to grow with us.

Every year, PCO has open board seats to fill. As a member-based organization, we look to you to consider nominating yourself or others you feel would lead our work with the integrity we strive to uphold. PCO's Advisory Board is responsible for ensuring adherence to legal standards and ethical norms, overseeing the organization's financial health, monitoring and strengthening our programs and services, all while building a strategic plan to help us meet our goals. PCO values a diverse and inclusive board that supports the mission of PCO and represents the membership by having a balance of interests, backgrounds and perspectives. To support this diversity, the board is comprised of both certified and non-certified operations, industry professionals, academia and consumers.

If you are interested or know someone who would be a great addition to our board, please consider submitting your nominations to our Governance Committee for review. You can find out more about board terms and qualifications on our website: [www.paorganic.org/boardnominations](http://www.paorganic.org/boardnominations).

## Advertise in Organic Matters

*Organic Matters* is the quarterly newsletter of Pennsylvania Certified Organic, a non-profit organization serving growers, processors and handlers of organic products. Issues contain articles on the latest news and research in the organic industry, often highlighting our certified members. Approximately 1,500 copies of each publication are distributed directly to members and those requesting information about organic agriculture, and made available to the public at conferences, exhibits and educational programs in the Mid-Atlantic region.

Ad size	PRICING		Dimensions (in)
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Back cover (in color)	\$572	na	8.5 × 9
Full Page	\$362.50	\$1,232	8 × 10
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The above rates refer to a single-issue ad placement and a subscription for ad placement in four consecutive issues.

**A 15% discount is granted for the purchase of the 4-issue subscription.**

For more information, please contact [newsletter@paorganic.org](mailto:newsletter@paorganic.org) or call the PCO Office at 814-422-0251.





# 2020 ANNUAL REPORT

## VISION:

Our vision is that all communities are enriched through organic food and farming.

## MISSION:

Our mission is to ensure the integrity of organic products and serve our farming community.

## CORE VALUES:

- Keep people at the center of every action, interaction, decision.
- Promote restorative practices that improve the world for future generations.
- Embrace transparency and integrity in all our work.

## STRATEGIC PRIORITIES FOR 2020

- Investments in infrastructure to streamline the certification process.
  - New database to provide efficiencies in processes leading to better customer service.
- Hire PCO's next executive director to lead our organization and embody our mission with integrity and purpose.
  - Diana Kobus joined us in June 2020 with knowledge, conviction and

enthusiasm for our industry and the people in it.

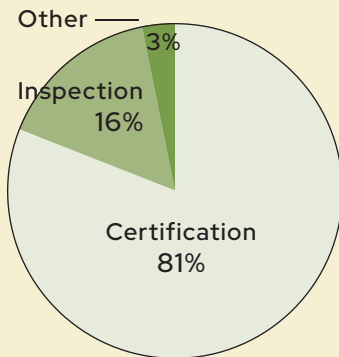
- Workplace excellence
  - Hiring more technical staff to support our clients through the certification process.
  - Transition to a primarily remote office to support nationwide recruitment.



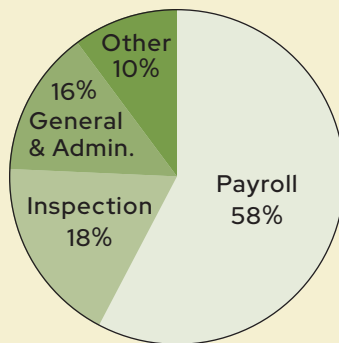
**PCO certifies operations in 22 states.**

*\* based on data pulled from the Organic Integrity Database*

## FISCAL YEAR FINANCIALS



**TOTAL INCOME**  
\$3,605,910



**TOTAL EXPENSES**  
\$3,515,103

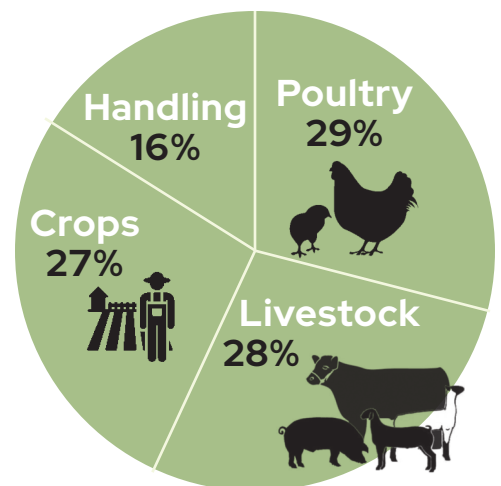
## 2020 – A YEAR OF REFLECTION AND CHANGE

2020 was a year where systemic racial injustices were brought to light as we witnessed too many senseless tragedies. PCO is committed to being part of the solution to bring about a fair, equitable and just food system and making sure our vision that ALL communities are enriched through organic food and farming is omnipresent in our work. We have a long way to go, but our journey has begun with building a foundation of

understanding through listening and growing:

- Investment in Diversity, Equity and Inclusion training for both our staff and board members.
- Foster a more diverse and inclusive workforce by making a financial contribution to MANRRS (Minorities in Agriculture and Natural Related Sciences)

## 1,659 TOTAL ORGANIC CERTIFICATIONS



**213 Newly Certified Clients in 2020.**



# PCO Core Values in Action

*Staff model core values in their day to day work*

DIANA UNDERWOOD, DIRECTOR OF OPERATIONS

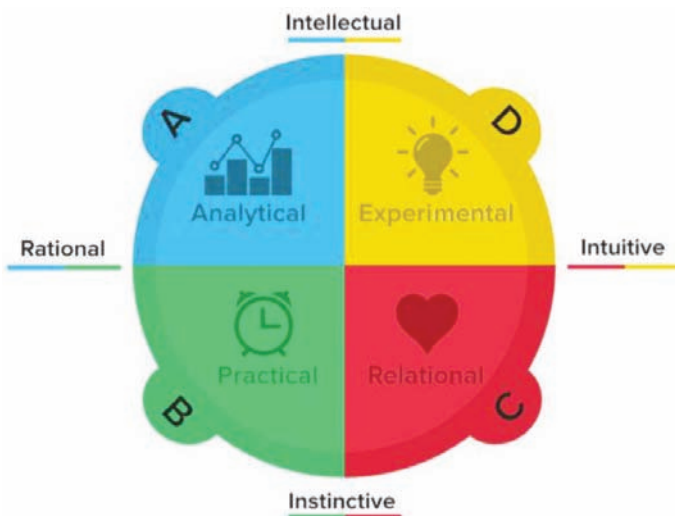
PCO is deeply committed to our Core Values Statements, but what exactly is an organizational core value? Company values are guiding principles and fundamental beliefs; they are a moral compass used for decision making; and they set the standard for behavior and performance without compromise. It is this commitment to uphold our core values that guides *how* we do the important work of fulfilling our vision: all communities are enriched through organic food and farming. *How* we do this work is just as important as what we are working towards.

So once we know what our core values are, is that enough? No. Much like any piece of paper you might “file away”, simply having core values on paper will not mean very much unless you are taking actions toward them every day. One way PCO is taking action to model our core values is by engaging in Diversity, Equity, and Inclusion training. This work is essential to address social injustices. We are engaging with experts in this field and starting with foundational training on cognitive diversity, communication, and conflict.

All PCO staff attended the first training on cognitive diversity, which explored each individual’s preferred thinking style. How would you categorize your preferred way to give and receive information?

- Do you follow the data? (analytical)
- Are you more of an idea person? (experimental)
- What about relationships, do you prefer to think about who

## Cognitive Diversity – Preference and Bias



## The Power of the Pause



might be impacted? (relational)

- Or maybe you fall into the details and planning category? (practical)

By understanding our own style and considering the style of those we work and live with, we have an opportunity to **cultivate trust**, which is the foundation of any relationship. The PCO team is already finding ways to apply this learning and will continue to build upon what we’ve learned in future training.

Cultivating trust directly aligns with one of PCO’s core values: *“Embrace transparency and integrity in all our work”*. We foster relationships that build trust with each other and with all of our stakeholders by:

- Embracing humility, owning mistakes, and honoring commitments.
- Actively welcoming and giving constructive feedback.
- Fostering a participatory workplace through inclusive discussion and decision making.

In order to better highlight how this core value shows up in the PCO workplace, we are sharing a couple examples to highlight in this issue:

- **Certification Database Transition:** The PCO team worked hard to configure our new database that will result in a more efficient process, smoother communication between clients and inspectors, faster turnaround times, and an overall better user experience for our stakeholders. This involved a lot of inclusive discussion and decision making, all the while, keeping our stakeholders at the forefront.

*Thank you to the entire PCO team for making this a true team success!*

- **Hiring New Team Members:** The most important thing we do as an organization is hire the right team members. Without the right people, we couldn’t live our values and uphold our vision. PCO recently hired an Inspections Program Assistant Manager and three Certification Specialists. This is no small feat! We use an inclusive hiring process with a diverse hiring panel, who provide feedback to foster a participatory workplace.

*Thank you to our hiring panels: Cathy, Dara, Diana K, Jen, Justine, Kyla, Lauren, Shawnee, Stacey, Stephen, and special thanks to Sandy for creating this vision and bringing it to reality.*

It is these examples and the entire PCO team that make PCO such a great place to work. You can read more about the action steps we strive to model by visiting our Mission, Vision, and Values page on our website: [www.paorganic.org/about/mission-vision-and-core-values/](http://www.paorganic.org/about/mission-vision-and-core-values/)

# Dear Aggy



Dear Aggy,

I'm planning on putting up more baled forages for my dairy herd this summer, but I'm at a loss whether I'm allowed to use any preservatives or inoculants. Can you give me an idea of what I'm allowed to use, and what to stay away from?

– Frank Forage

Dear Frank,

Forage treatments, such as fermentation aids, preservatives, and microbial inoculants, are considered Crop Production Aids and are reviewed accordingly by PCO.

Forage inoculants are commonly available as water soluble (WS) or granular form, and are used to assure optimum fermentation, stability, and improved feed value. They are often used to treat many different types of hay and forages, including corn silage, haylage, baleage, and high moisture corn. They

can also be applied on multiple types of dry hay and small grain silages (such as oatlage). Preservatives are used to allow for baling dry hay at higher moisture levels, which allows for reduced field curing time.

Common active ingredients allowed in forage treatments used on organic operations include lactic acid bacteria and enzymes, which all need to be non-GMO. Agricultural ingredients, such as sugar, are allowed and are not required to be organic.

Common prohibited ingredients in forage treatments include the following:

- Propionic Acid
- BHT
- Potassium Sorbate
- Artificial color
- Synthetic anti-caking agents
- Mineral Oil

Approved Forage Treatments can be found in our published 2021 PCO Annual Approved Crop Materials List Materials under the Crop Production Aid section in the Forage Treatment category. If you can't find the forage treatment you are looking for – we'll gladly review it for you! Submit a material review request on our website at [www.paorganic.org/certification/material-inputs/](http://www.paorganic.org/certification/material-inputs/) or call us with your request at 814-422-0251.



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## Certification Update

Kyla Smith, Certification Director



### NEW CERTIFICATION DATABASE BENEFITS

The farming season is well underway and many of you are likely preparing for your 2021 on-site inspection. Like you, we are also preparing for the 2021 inspection season - reviewing annual update paperwork and getting files out to inspectors.

As many of you know, we launched a new certification database powered by Intact Platform earlier this year. As previous communications have outlined, Intact Platform is 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.

While it is quite a feat to transfer the immense amount of data related to our more than 1600 certified operations and thousands of materials, we are already seeing some of the many benefits and hope you are too! These include streamlined processes, better monitoring and tracking of information, data/information congruency across user groups (i.e. same info is available for internal staff, inspectors and clients) and more user friendly client and inspector portals.

If you have not logged into the new web-based client portal yet, now is a great time to do so and check out the new platform that provides greater access to your information. If you are having difficulty logging in, please contact your Program Assistant. Additionally, if you currently interact with PCO through postal mail and would like to learn more about the great benefits of the PCO Certification Portal for a future switch to interfacing with PCO through the portal, you can find more information on the PCO website at [www.paorganic.org/database-transition-enhancing-the-certification-experience/](http://www.paorganic.org/database-transition-enhancing-the-certification-experience/) or contact Reva Baylets ([reva@paorganic.org](mailto:reva@paorganic.org); 814-422-0251 ext 205).

You will soon be notified (if you haven't been already) that your Initial Review Report (IRR) is available for you in the PCO Certification Portal. Your IRR will be available in the Files tab. If you are having difficulty navigating to the right place, please reach out to your Program Assistant for further assistance.

Here's one additional reminder as the end of summer will be here before we know it: this is a great time to start thinking about the organic cost share program. All certification fees paid between 10/1/2020 and 9/30/2021 will be eligible for reimbursement. For more information, please visit the PCO website at [www.paorganic.org/certification/get-started/fees/](http://www.paorganic.org/certification/get-started/fees/) or contact Elizabeth Leah ([elizabeth@paorganic.org](mailto:elizabeth@paorganic.org); 814-422-0251 ext 217).

STAY CONNECTED, VISIT:  
[paorganic.org](http://paorganic.org)

## Inspection Update

Stephen Hobaugh  
Inspection Program Coordinator



### A YEAR OF TRANSITIONS

#### *And what it will mean for your inspection.*

A summer greeting from the PCO inspection department! The warm sun brings hope in the promise of a new season and the signs of passing through a challenging period in world history. There have been many transitions for PCO throughout the past year as well. The position of Inspection Program Coordinator and Inspection Program Manager have both experienced turn-over. As I finish my first year in the position of Inspection Program Coordinator, I am excited to welcome a new member to the team in the position of Inspection Program Assistant Manager, Corinne Wesh. Corinne will be joining the team this season to help advance the mission of the PCO Inspection Program.

The 2020 season presented unique challenges in inspection scheduling which required flexible and creative adjustment strategies from PCO. PCO reacted to these challenges by expanding our methods of conducting inspections to include limited contact on-site inspections, remote/virtual inspections, desk audits, and hybrid inspection techniques which combined elements from some or all of the previously listed inspection styles. PCO is continuing to offer inspectors these options for annual update inspections to allow for safe and flexible completion of inspections. Pending public health recommendations from the CDC, and best practices recommendations from the Accredited Certifiers Association and other professional organic industry organizations, PCO will develop and administer a plan to return to on-site inspections for all annual update inspections. The USDA-NOP has NOT waived certifiers' responsibility to conduct onsite inspections. Therefore, inspections conducted without an on-site portion will have an on-site follow-up pending PCO's plan for returning to on-site inspections. Follow-up inspections may be announced or unannounced.

Despite the trend of the decline of cases of COVID-19, the pandemic continues to pose public health risks for ourselves and the communities we live in and serve. In the event of a limited contact on-site inspection for the 2021 season, it is crucial that both the operator and the inspector adhere to social distancing and PPE guidelines. If either party perceives that the other party is not honoring social distancing protocols, communicate directly to PCO. If the problem persists, either party is empowered to end the inspection at any time and notify PCO of the problem. Inspectors who do not follow social distancing guidelines may have their work reassigned. Clients who refuse to follow the same guidelines will be seen as having refused the inspection, and this may result in a Notice of Non-compliance and/or delayed certification.

PCO has switched to a new software for managing our certification administration, and this new software has greatly changed how PCO administers inspections. The major

improvements that will positively affect your certification experience include more current and accurate inspection files, clearer inspector access to the history of your operation, easier tracking of outstanding compliance items, more detailed information for PCO to know what step in the certification workflow your file is at to help bring you quicker customer service, and an inspection report that is tailored specifically to your operation. PCO anticipates these improvements will result in faster and more reliable customer service. The new software requires learning from both PCO staff and contracted inspectors. Flexibility and grace are essential for a successful first year in the new software. Other users of this software I've spoken with have all shared the same sentiment with me: the first year presents challenges, but the ultimate benefits of the new tool used by a well-trained staff and inspectors bring great improvements.

One remarkable improvement already implemented as part of the new software, is the ability to plan and track proposed inspection dates for the season. If you are interested in learning more about your proposed inspection date, please contact me at the PCO office using my contact information at the end of this article. If you are making large changes to your organic system plan and would like to know if you need to request an urgent or time sensitive inspection, please reach out directly to your assigned certification specialist. If you don't know who that is, contact the main office and they will connect you with the appropriate person. Your inspector may also request changes to your inspection date as the season progresses to better batch and more efficiently group your inspection with other inspections in your geographic area.

PCO's inspection season will run through 10/31/21. This means PCO is working to have all inspections conducted by 10/31/21. The objective of defining the end of the inspection season with this date is to provide a timely closure to the 2021 season, return of inspection results through certification reports, and a strong foundation for starting the 2022 season. Your participation with meeting this goal is essential to a timely closure of the season and a successful beginning of the 2022 season. You can contribute towards this goal by working in a timely manner with your inspector as they reach out to schedule with you and maintaining your commitment to a scheduled inspection. Emergency situations arise and are accounted for within the PCO policy on inspection cancellations, but unjustified or repetitive inspection cancellations, non-responses to inspector requests to schedule inspections, and refusal to participate in inspections may jeopardize your certification. Your participation in a cooperative effort with PCO to conduct your 2021 inspection will increase your customer service experience and the collective service for all operations.

If you have any questions about your 2021 inspection, or any other inspection related questions, please contact me through your preferred method of communication. My email address is [stephen@paorganic.org](mailto:stephen@paorganic.org), my phone number is 814-422-0251 ext 207, and for written correspondence Attn: Stephen Hobaugh, 106 School Street, Suite 201, Spring Mills, PA 16875.

If you have any questions, as always please don't hesitate to contact us at the PCO office.

## Legislative Update

Kyla Smith, Certification Director

### ORGANIC LEGISLATION INTRODUCED BY CONGRESS

On April 30th, significant legislation was introduced in the House of Representatives that forges a strong future for organic standards and their place in a progressive food and farming system.

In a bipartisan effort, Rep. Peter DeFazio (D-OR) and Rep. Rodney Davis (R-IL), along with leading members of the House Organic Caucus, Chellie Pingree (D-ME), Jimmy Panetta (D-CA), Dan Newhouse (R-WA), and Ron Kind (D-WI) introduced the Continuous Improvement and Accountability in Organic Standards Act (CIAO). The Bill calls for a more responsive and transparent federal process for the stewardship of organic that brings the government up to speed with the modern organic sector.

The unique private-public partnership between the USDA-NOP and the National Organic Standards Board has made the organic system the gold standard for food and agricultural systems around the world. But over the last ten years, the USDA has not completed rulemaking on a single one of the 20 recommendations the organic industry has advanced. This bill would require the U.S. Department of Agriculture to advance and implement recommendations from the National Organic Standards Board that have wide support from the organic industry in a timely manner and ensure the continuous improvement of organic standards.

## Materials Update

Jen Berkebile, Materials Program Manager



### MATERIAL REVIEW STATUS CHANGES

The PCO Materials Team is hard at work on your material review requests. Remember, if you have any outstanding material reviews, don't hesitate to contact us at 814-422-0251 for an update.

As you have probably heard, PCO is now operating out of a new certification database. Because of this new database, you may be seeing some materials-related documents that look a little bit different. We will still be sending materials letters as we review input materials on your behalf. We can now also more easily send a complete and up-to-date list of materials used by your operation. These lists are sorted by whether or not the input material is allowed and by the use of the material. You can request to have a complete list of your inputs sent at any time,

*continued on page 14*



continued from page 13

and it will automatically be sent with your annual update paperwork and with your certification report.

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

## ALLOWED

### ■ Crop Materials

- **Pro Serve Forage Treatment by Conklin Company, Inc.**, is allowed as a crop production aid.

### ■ Livestock Materials

- **Organic Dairy Complete 1.25 by Keen Nutrition** is allowed as a livestock feed additive / supplement.

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

### ■ Livestock Materials

- **Udder Velvet from Crystal Creek** is prohibited as a livestock teat dip / udder care product

## Processor/Handler Update

Cathy Jackson  
Certification Program Assistant Manager



## PRODUCT REVIEW

Processors and handlers often add or update the products listed on their organic certificate. New organic products, new or revised labels, and product formulation updates are often reviewed outside the annual certification cycle through a process called “product review”

When a certified operation requests a product review by submitting information to PCO (typically by emailing the assigned Certification Specialist), we review the information to verify compliance with National Organic Program (NOP) regulations and PCO policy. After review, the Certification Specialist will communicate any findings or issues that need to be addressed prior to approval. Once compliance is fully verified, the new product is added to the organic certificate (if applicable) and labels are stamped with approval. These documents will be sent to the certified operation and/or available in their web portal (PCO Certification Portal).

While PCO aims to review information submitted within 10 days of submission, approval can only be granted once compliance is fully verified. Items that often delay approval include material reviews of non-organic ingredients or processing aids, non-compliant labels that require correction by the client, and changes to the formulation after the initial product submission. An inspection may be required prior to approval if requesting a new facility or type of production for certification.

PCO receives product review requests from numerous operations at a time and reviews them on a rolling basis. The timing needs for product reviews should be communicated

with the initial submission. Calling the Certification Specialist prior to submitting complex, large, or urgent reviews is recommended. Submitting all documentation for the product review at one time helps the review process be completed effectively. For unusual circumstances, such as an operation requesting a significant number of urgent product reviews, PCO may charge an administrative fee of \$75/hour.

The type of documentation that needs to be submitted for a product or label review depends on the type of review being requested. However, there are some general guidelines:

■ **New Product** = product profile, organic certificates of organic ingredient suppliers, label/s, product flow chart (if new type of process), specification sheets for multi-ingredient or non-organic ingredients / processing aids

■ **Updated Product or Formulation** = updated product profile, organic certificates or specification sheets for any new ingredients, updated label/s (if applicable)

■ **Updated Label** = label/s

Each product review is unique and may involve additional documentation based on the specific circumstances. A general overview is outlined below for reference:

■ **Product Profile** (contains the product formulation)

### • Human food

- Must list all ingredients in the product (organic and non-organic)
- Formulation must add up to 100% and organic content must comply with labelling category selected
- Must list all processing aids

### • Livestock feed

- Must list all ingredients in the product (agricultural and non-agricultural)
- Standard Formulations must add up to 100% and organic content must comply with labelling category selected

■ **Organic Certificates** (from organic ingredient suppliers or product co-packers)

- Must be issued within the past 18 months (USDA Organic Integrity Database may be used to generate and/or verify documentation)
- Must include any product lists or addendums
- For non-NOP certified suppliers, additional documentation may be required

■ **Uncertified Handler Declaration** (from uncertified handlers / brokers / storage facilities)

- Reviewed to verify if uncertified operations used for ingredient sourcing or storage quality as “excluded” from certification per the NOP regulations §205.101
  - Specification sheets (lists sub-ingredients and manufacturer information)
  - Must be submitted for multi-input organic ingredients and all non-organic ingredients / processing aids
  - Non-organic ingredients must be reviewed for compliance by PCO

continued on page 16

# “It takes edema out more quickly than anything else.”

— Emily Pankratz



**EMILY PANKRATZ**, herd manager  
Holtz Ridge Grass Farm, RUDOLPH, WISCONSIN  
150 cows, Certified Organic, SCC 200,000  
Emily (left) at our Central Plains Dairy Expo booth  
with her mother Peggy.

“We started using Udder Comfort™ a couple months ago to get better milk quality results. We keep using it because it takes edema out of udders more quickly than anything else,” says Emily Pankratz, herd manager for the 150-cow dairy at Holtz Ridge Grass Farm, Rudolph, Wisconsin, where she loves caring for the cows from calving through dryoff.

Emily stopped by our booth at Central Plains Dairy Expo after buying the donated gallon in the Dairy Forward auction. “Our protocol is to put it on after every milking (post-calving), until the cow or heifer is not high in the CMT anymore. This includes cows that may acquire mastitis or high SCC during lactation.”

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“What I like most about this product is how fast it works on edema. It helps blood flow and gets our heifers off to a quick start,” Emily explains.

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continued from page 14

- Verification of Natural Flavors form (VNF) may need to be submitted for review of non-organic natural flavors
- Verification of Ingredient form (VOI) may need to be submitted for review of other non-organic ingredients

■ **International Trade Supplement** (must be submitted if ingredients are imported or the product will be exported and/or approved under an equivalency arrangement)

■ **Labels** (color label proofs for each label and pack size)

- Retail label requirements:
  - "Certified Organic By..." statement must be directly below accurate distributor information
  - Ingredient statement
    - Listed in order of predominance and by common or usual name
    - "Organic" ingredients listed as "organic" or with a reference mark such as an asterisk \* (not required for livestock feed labels)
- A product lot number / identifier must be displayed on non-retail labels, if applicable
- If used, USDA seal must be compliant (color, font, size, usage)
- If used, PCO logo must maintain formatting provided (color, font)
  - If both PCO logo and USDA Organic Seal are utilized in proximity to each other (on the same panel of a label), the USDA seal must be more prominent

■ **Product Flow Chart** (depicts organic production from incoming ingredient receiving through each step of production and storage to outgoing final product)

Product reviews are an important part of the certification process for many processors and handlers. PCO's new certification database allows for greater efficiency of our internal processes for product review. However, submitting product review requests with complete information and as much advance notice as possible best ensures the certified operation's needs are able to be met. Certification Specialists may be contacted for requesting technical assistance or submitting product review requests.

## Standards and Policy Update

Kyla Smith, Certification Director

### ORIGIN OF LIVESTOCK PUBLISHES THIRD PROPOSED RULE

The U.S. Department of Agriculture (USDA) Agricultural Marketing Service (AMS) once again reopened the comment period for the Origin of Livestock proposed rule originally published on April 28, 2015. This rule would amend the National Organic Program regulations regarding the origin of livestock that produce milk for an organic operation (e.g. heifers/cows, goats, sheep).

In this third proposed rule, USDA was soliciting views (comment period closed on July 12, 2021) on the following topic areas:

1. Whether the rule should **prohibit organic dairy operations from acquiring transitioned animals** to expand or replace animals to produce organic milk (the proposed rule as written does not limit movement or sale of transitioned animals)
2. Whether the rule should **use the term "operation"** to describe the regulated entity (the proposed rule as written uses the term "producer")
3. Whether an implementation **timeframe** of the final rule is needed (the proposed rule proposes that final rule becomes effective immediately with an exception for any transition that was already approved by a certifier)
4. If there should be any **additional exceptions** to the one-time transition requirements when re-transition is needed (scenarios where the current regulations for temporary variance or emergency treatment don't apply)
5. The accuracy of cost estimates used in the **updated economic analysis** of the proposed rule based on new information since 2015

Stakeholders have been pushing USDA to implement a final rule as soon as possible as inconsistent implementation by operations and certifier enforcement of the current origin of livestock regulations continues to be a challenge.

For more information on the Origin of Livestock rulemaking process, contact Kyla Smith, PCO Certification Director, at [kyla@paorganic.org](mailto:kyla@paorganic.org) or 814-422-0251 x216.

### STRENGTHENING ORGANIC ENFORCEMENT (SOE) RULEMAKING UPDATE

During the Spring National Organic Standards Board meeting, Dr. Jennifer Tucker, Deputy Administrator for the National Organic Program, provided an update on the Program's progress in drafting the SOE final rule. Dr. Tucker stated that the final rule was in the process of being written, moving beyond the phase of reviewing comments submitted by stakeholders during the open comment period. After the final rule is drafted by NOP, it must undergo the clearance process, which involves interagency review as well as a review by the Office of Management and Budget.

The Strengthening Organic Enforcement rule will amend the USDA organic regulations to strengthen oversight and enforcement of the production, handling and sale of organic agricultural products. If you are engaged in the organic industry, you will likely be affected once the rule is finalized.

Affected entities may include but are not limited to:

- Brokers, traders, and importers of organic products that are not currently certified under the USDA organic regulations (AMS estimates that 961 domestic, and an equal number of foreign-based, operations would need to become certified as a result of this rule);
- Individuals or business entities that are considering organic certification;
- Existing production and handling operations that are cur-

- Currently certified organic under the USDA organic regulations;
- Operations that use non-retail containers for shipping or storing organic products;
- Retailers that sell organic products;
- Storage facilities, grain elevators or ports that process or alter organic products in any way;
- Operations that receive or review organic certificates to verify compliance with USDA organic regulations;
- USDA-accredited certifying agents, inspectors, and reviewers;
- Operations that import organic products into the United States; and/or
- Operations that export organic products to the United States.

PCO will continue to provide information as the rule moves through the various stages toward implementation. It is never too early to start thinking about how you will implement the proposed changes and have a plan to implement upon publication of the final rule. One of the major areas of change the SOE will initiate is the requirement for more operations in the organic supply chain to become certified. If you work with uncertified handlers (that are currently exempt), it may be a good time to talk to them and encourage them to become certified now and beat the rush. PCO is ready to bring these operations into our organic family.

For more information on becoming certified please call the PCO Office (814-422-0251) or visit the PCO website at [paorganic.org](http://paorganic.org).

For more information on the Strengthening Organic Enforcement rulemaking process, contact Kyla Smith, PCO Certification Director, at [kyla@paorganic.org](mailto:kyla@paorganic.org) or 814-422-0251 ext 216.

### REMINDER: U.S.–INDIA ORGANIC RECOGNITION ARRANGEMENT TRANSITION TIMELINE

In January of 2021, the U.S. Department of Agriculture (USDA) announced that it was ending its organic recognition arrangement with India and initiating an 18-month transition period to allow organic operations certified by APEDA-accredited certifiers to apply for direct certification to the USDA organic standards by USDA-accredited certifiers. As we are now in the middle of the transition period, this is a reminder of the timeline and required actions for PCO certified operations that are purchasing organic product that is exported from India.


#### By July 12, 2021:

Any APEDA-certified organic operation wishing to export organic products to the US must have applied for USDA-NOP certification. This does not mean that only the final India-based exporter of the product must be seeking USDA-NOP certification; rather, all entities in the supply chain must be seeking certification.

#### After July 12, 2021:

For PCO certified operations to continue accepting products from suppliers in India, those suppliers must have applied

*continued on page 18*



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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](http://www.NODPA.com)

**SAVE THE DATE!**

We are thrilled to announce that  
The 21<sup>st</sup> Annual  
**NODPA Field Days**  
September 30<sup>th</sup> to October 1<sup>st</sup>, 2021  
will be held at  
**Wolfe's Neck Center**  
**for Agriculture & the Environment**  
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for certification to a USDA accredited certifier.

PCO certified operations will need to use the Organic Integrity Database to verify that any organic supplier is either already USDA-NOP certified or has applied for organic certification with a USDA-accredited certifier. This verification process and how your operation implements it will be reviewed by your Certification Specialist and checked at your annual inspection.

**By July 12, 2022:**

All organic products being exported to the United States from India must be certified organic to the USDA-NOP and have a valid organic certificate.

For more information visit the NOP's International Trade webpage at [www.ams.usda.gov/services/organic-certification/international-trade/India](http://www.ams.usda.gov/services/organic-certification/international-trade/India)

If you have questions on how this will impact your organic operation, please call your Certification Specialist.

**U.S. AND MEXICO KEEP ORGANIC TRADE OPEN**

On May 7, 2021, Mexico's agriculture secretariat extended the deadline for U.S. organic exports to be certified to its Organic Products Law (LPO) until December 31, 2021. Through 2021, USDA-certified organic products may continue to be exported, but on January 1, 2022, organic products exported from the U.S. to Mexico must be certified to the LPO standard.

US Secretary of Agriculture Tom Vilsack released a state-

ment in which he expressed gratitude for both Mexico Secretary of Agriculture and Rural Development Victor Villalobos's willingness to extend the compliance deadline and for USDA's continued commitment to work with U.S. organic exporters to assist in transitioning to LPO compliance. Vilsack also recognized this important step for American agriculture and for maintaining positive bilateral relations between the United States and Mexico, which is one of the U.S.'s most important export markets.

**Quality Update**

Angela Morgan  
Quality Systems & IT Manager



**PCO IMPLEMENTS NEW QUALITY INITIATIVES**

As many of you know PCO recently implemented a new certification database, Intact Platform. The new database will not only improve the overall customer experience, but provide many quality system control and measurement features to strengthen our certification process. Along with a robust and fully traceable audit trail, the database will make data sharing, project management and task tracking more efficient and enhance the overall quality of certification reviews. This in turn will allow PCO to better fulfill our accreditation requirements for accurate procedure documentation and reliable record retention, as well as ensuring timely and precise completion of key processes such as inspection reviews and compliance oversight.

To better monitor the quality of our processes the PCO quality team will conduct quarterly internal audits along with the yearly program review required by the organic regulations. More frequent review of our procedures will allow us to assess the operating efficiency of key PCO certification processes, evaluate PCO's certification procedures for continuous process improvement, identify and sustain areas of strength, and appraise overall conformance to, and completeness of, PCO standard operating procedures and work instructions throughout the course of each certification cycle instead of waiting for the typical yearly program review. Diligence in these reviews will help us to identify and correct any issues internally prior to any external audits.

Early quarterly review will focus on the new database to assess data integrity, process efficiency and completeness of revised procedures. Subsequent reviews will provide follow up to findings from the annual program review as well as any non-compliances from our recent midterm accreditation audit. PCO is always looking to improve our overall quality, regulatory compliance and customer service, so future quality initiatives will spotlight improvements to additional systems and engagement in programs that can enhance our efforts to support and promote organic integrity.

**It's Time To Fertilize**  
**\*10% off 25 & 50 lb bags during the month of July**

**Berry Mix 4-2-4**  
Fertilize strawberries and brambles after the last harvest with Berry Mix 4-2-4 one time between July-September before you mulch the plants. The fertilizer will be more readily available to the plant roots if allowed to be absorbed directly into the soil while protected by the mulch. For strawberries, after harvest apply 8-10 lbs per 100 row ft. For brambles, apply 6 lbs per 100 row ft.

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**Holly Care 4-6-4**  
For blueberries especially, between July-September we recommend a one time application of Holly Care 4-6-4 to provide a high phosphorus fertilizer with sulfur to give plenty of time for the roots to absorb them. Apply 10 lbs per 100 row foot. Can also be used on hollies, dogwoods, gardenias, marigolds, rhododendrons, azaleas, ferns, hydrangeas and all other acid loving plants.

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# New Members

PCO Welcomes 2nd Quarter New Members!

## NEWLY CERTIFIED ORGANIC

**Aaron Hostetler**  
Sugar creek, OH

**Adam Byler**  
Telford, PA

**Almas Foods International LLC**  
Bethlehem, PA

**Alto IP Holdings, LLC**  
Herndon, VA

**Alvin H. Esh**  
Quarryville, PA

**Amos S. Lapp**  
Allenwood, PA

**Blackbird Farms LLC**  
Emmaus, PA

**BPG International, Inc.**  
Wilmington, DE

**Brenda Balmer**  
Fredericksburg, PA

**Brian & Wanda Warwick**  
Sabinsville, PA

**Craig Rodes**  
Sugar creek, OH

**Daniel S. Fisher**  
Willow Street, PA

**David S. Burkholder**  
Penn Yan, NY

**Elmer F. King**  
Millersburg, PA

**Elvin G. Nolt**  
Richland, PA

**Ephraim H. Miller**  
Herndon, PA

**Ernest D. Nissley**  
Freedom, NY

**Gustavo López**  
Philadelphia, PA

**Heno Group Corporation**  
Hamilton, NJ

**Israel S. Beiler**  
Spring Run, PA

**Jennifer Merritt Chantz**  
Fort Washington, PA

**Jerry Troyer**  
Sugar creek, OH

**John D. Beiler**  
Doylestown, PA

**John King**  
Brogue, PA

**Jonathan Detwiler, Leon Detwiler, and Gerald Detwiler**  
Little Falls, NY

**Joseph L. Renno**  
Groton, NY

**Josiah Troyer**  
Sugar creek, OH

**Klint Frey**  
Conestoga, PA

**Leroy S. Lapp**  
Kirkwood, PA

**Menno Hershberger**  
Sugar creek, OH

**Michael Arnold**  
Milroy, PA

**Ronald S. Ringler**  
Dundee, NY

**Samuel E. Stoltzfoos**  
Kirkwood, PA

**Samuel M. Stoltzfus**  
Kirkwood, PA

**Short Hill Maple Farms, LLC**  
Westfield, PA

**Steven and Randy Hula Farm**  
Jordanville, NY

**Stevie S. Stoltzfoos**  
Kinzers, PA

**Threefold Farm**  
Mechanicsburg, PA

**Tulkoff Food Products, Inc. Ohio**  
Cincinnati, OH

**Wilbur Shank**  
Lancaster, PA

## ORGANIC PLUS TRUST

**Deja Moo LLC**  
McDonough, NY

**Jonathan and Leon Detwiler**  
Little Falls, NY

## BUSINESS

**AgriEnergy Solutions LLC**  
Princeton, IL

**Earth Care LLC**  
Crozet, VA

**Herr Farm Products**  
Peach Bottom, PA

**Jefo Nutrition Inc**  
Saint-Hyacinth, Quebec, Canada

**Micron Bio-Systems Inc**  
Buena Vista, VA

**Moreda Valley Dairy**  
Petaluma, CA

**Rochester Midland Corporation**  
Rochester, NY

**Sea-90 Ocean Minerals**  
Marietta, GA

## ADVOCATE

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## Marketplace

### CROPS

Certified Organic meadow grass hay. Large square bales. Contact for pricing at 717-476-1220. York 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.

### LAND FOR SALE/RENT

Certified Organic Land for Sale- 17-acre parcel with a carriage house, horse shed, and fenced pasture (in grass). \$350,000

40-acre parcel (30 acres in grass) \$650,000. Contact 717-476-1220. York County.

Our 5 acre farm in Central Pennsylvania will be sold at auction on Sept 6. For general info and video overview see: [www.gotoauction.com/sales/view/1305724.html](http://www.gotoauction.com/sales/view/1305724.html). Over the years we have made many improvements on this farm for direct marketing of grass-fed broilers, hens, turkeys, beef and hogs. No organically-prohibited substances have been used on the land for over 30 years. For specific information on all this farm and beautiful area has to offer, please see <https://overthemoonfarm.com>

You can also email Lyn Garling at <mailto:lyn@overthemoonfarm.com>



# Event Calendar

NOTE: With all in-person events, it is advised that participants follow current CDC and COVID-19 safety protocol and guidelines.

## JULY

### July 23

Pasa Sustainable Agriculture  
Webinar  
*What Can We Do About Pesticide Drift?*  
12:00-1:00 pm ET  
pasafarming.org

### July 23

Organic Trade Association/Organic  
Center  
Webinar  
*Science-Based Composting Practices*  
12:00-1:30 pm ET  
ota.com

### July 23

Rodale Institute  
*Organic Field Day*  
8:30 am-3:30 pm ET  
Kutztown, PA  
rodaleinstitute.org/visit/organic-  
field-day

### July 26

Future Harvest/CASA  
On-Farm Workshop  
*Soil Health and Storage at Cutfresh  
Organics*  
*Grain Series: Making local, organic grains  
a viable industry*  
9:00-11:00 am ET  
Cutfresh Organics – Eden, MD  
futureharvescasa.org

### July 28

Rodale Institute  
Webinar  
*Regenerative Agriculture and Soil  
Microbial Carbon Pump (MCP)*  
2:00-3:00 pm ET  
rodaleinstitute.org/education/webinar

### July 29

Pasa Sustainable Agriculture  
On-Farm Workshop  
*Scouting & Forecasting: Proactive Pest*

*Prevention in Vegetables*  
6:00-7:30 ET  
Braddock Farms – Braddock, PA  
pasafarming.org

### July 30-August 6

*Virtual NOFA Summer Conference*  
nofasummerconference.org

## AUGUST

### August 10-12

Penn State Extension  
*Ag Progress Days*  
Russell E. Larson Agricultural Research  
Center  
9:00 am-5:00 pm ET  
agsci.psu.edu/apd

### August 18

Pasa Sustainable Agriculture  
On-Farm Workshop  
*Growing Speciality Crops in Your  
Low & High Tunnels*  
3:00-5:30 ET  
Two Gander Farm – Downingtown, PA  
pasafarming.org

### August 20

Pasa Sustainable Agriculture  
Webinar  
*Siting & Design for Farm-Based Solar*  
12:00-1:00 pm ET  
pasafarming.org

### August 24

Pasa Sustainable Agriculture  
Webinar  
*Hoop House Design & Construction*  
6:30-7:45 pm ET  
pasafarming.org

### August 25-26

ACRES USA  
Virtual Event  
*3rd Annual Healthy Soil Summit*  
soil.acresusa.com

### August 27

Pasa Sustainable Agriculture  
On-Farm Workshop  
*Forage & Forest: Tour a Third-Year  
Silvopasture*  
9:00 am-1:00 pm ET  
Fiddle Creek Dairy – Quarryville, PA  
pasafarming.org

## SEPTEMBER

### September 14

Pasa Sustainable Agriculture

On-Farm Workshop  
*Extending Your Season with Low & High  
Tunnels*  
6:30-8:00 pm  
Braddock Farms – Braddock, PA  
pasafarming.org

### September 15

Pasa Sustainable Agriculture  
On-Farm Workshop  
*Two-Wheel Tractor Operation &  
Maintenance*  
3:00-5:30 pm  
The Seed Farm – Emmaus, PA  
pasafarming.org

### September 22

Rodale Institute  
Webinar  
*Research Update - Grain Nutrient  
Density in the Farming Systems Trial*  
2:00-3:00 pm ET  
rodaleinstitute.org/education/webinars

## OCTOBER

### October 6

Rodale Institute  
Webinar  
*Research Update - Organic Control  
Strategies for Swine Parasites in Organic  
Pastured Pork Systems*  
2:00-3:00 pm ET  
rodaleinstitute.org/education/webinars

### October 19-21

*National Organic Standards Board  
Meeting*  
Sacramento, CA  
ams.usda.gov/rules-  
regulations/organic/nosb/meetings

### October 20

Rodale Institute  
Webinar  
*Research Update - Nutrients and Soil  
Health in the Vegetable Systems Trial*  
2:00-3:00 pm ET  
rodaleinstitute.org/education/webinars

### October 27

Rodale Institute  
Webinar  
*Research Update - Diversifying Organic  
Inputs & Improving Soil Health at the  
Southeast Organic Center*  
2:00-3:00 pm ET  
rodaleinstitute.org/education/webinars

Alexandre Family Farm, Courtesy of the Regenerative Organic Alliance.



## The Roots of “Regenerative Agriculture”

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clearer regulations on stocking density, living areas, physical alterations, and feed requirements. The goal of this pillar is to provide all livestock with the “5 Freedoms:” freedom from hunger and thirst, freedom from discomfort, freedom from pain, injury, and disease, freedom to express normal and natural behavior, and freedom from fear and distress.

Often not discussed in the mainstream regenerative agriculture movement is the last pillar, social fairness, which aims to provide economic stability and fairness for farmers and workers. Under this pillar, farms must undergo a social fairness audit by a third party, such as Fair for Life, Fair Trade International, or Fair Trade USA. This pillar addresses issues such as forced labor, child labor, equal pay, discrimination, hours of work and health and wellness of all employees.

Together, these three pillars of Regenerative Organic Certified™ provide a holistic model for restoring our natural ecosystem, protecting the welfare of livestock, and building a safe and fair community of farmers and farmworkers.

Regenerative agriculture has its merits, and we have the Indigenous communities and innovative, forward thinking agricultural advocates, like Robert Rodale, to thank for that. But without the vigorous baseline of the National Organic Program and a third party to verify practices implemented by producers, the term “regenerative” could lose its value in the marketplace. For more information on regenerative organic agriculture’s history and standards, visit: [regenorganic.org](http://regenorganic.org).

If you are interested in becoming certified to the Organic or Regenerative Organic standards, contact Rodale Institute’s Organic Farm Consulting Services at [consulting@rodaleinstitute.org](mailto:consulting@rodaleinstitute.org) or call our office 610-682-1416. Learn more about Bob Rodale’s 7 Tendencies at [rodaleinstitute.org/wp-content/uploads/7-TENDENCIES-REGENERATION.pdf](http://rodaleinstitute.org/wp-content/uploads/7-TENDENCIES-REGENERATION.pdf)

Lastly, PCO has submitted an accreditation application to ROA and looks forward to adding the ROC program to their program portfolio in 2022! If you are a PCO certified operation and are interested in applying for this program once available, please contact your Certification Specialist so that PCO can track this information and follow up with you when the time comes.

## New Faces



Corinne Wesh



Jordan Downton



Gabrielle Rovegno

### CORINNE WESH, INSPECTION PROGRAM ASSISTANT MANAGER

Corinne joined PCO in June 2021. Originally from southern NJ, she now lives on a farm in Maine with her family where they produce organic seed from native and perennial plants. She holds a BFA from the University of Pennsylvania, and has worn many professional hats, including bicycle mechanic and organic inspector. Most recently, she worked in organic compliance and quality systems. In her free time, she enjoys camping, coffee, kayaking, and kestrels.

### JORDON DOWNTOWN, CERTIFICATION SPECIALIST

Jordan joined PCO in June of 2021 as a Certification Specialist. Jordan was an Organic Certification Inspector for PCO, NOFA-NY, MOSA, and OEFFA before joining the PCO team. Residing in Starrucca, PA his entire life, Jordan has worked on his family’s dairy farm which has been certified organic since 2007. In his free time, Jordan enjoys spending time with his family, hunting, fishing and just being outdoors enjoying nature.

### GABRIELLE ROVEGNO, CERTIFICATION SPECIALIST

Gabrielle joined PCO in June 2021. She grew up in Queens, NY and learned where her food came from through urban agriculture initiatives. Gabrielle studied Soil Science at University of Maryland and has an MS in Agriculture Education and Extension. She’s worked primarily with immigrant and refugee farming communities as well as beginning farmers in urban and periurban areas. Gabrielle is a competitive whitewater paddler and enjoys spending time in her garden and fiber arts.





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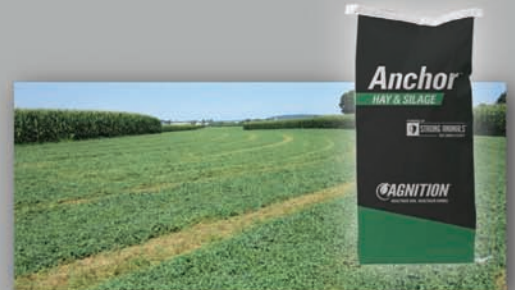


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