



Organic Matters

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Organically Speaking

The air is getting chilly here in Pittsburgh, and wherever you are I hope the season finds you enjoying this annual time of transition. It's a busy time of year at PCO, with inspections season in full swing and file reviews following soon after. If you need assistance, please reach out as proactively as possible to our staff, so that they can get you the right support in the right time.

With a lot of activity happening around proposed and approved changes in the regulation, it is very important that you read all client letters. For quick reference, we also catalogue all policy change communications on our website. For good measure, we also include announcements linked in our e-news and feature stories in this publication. We know how busy your operations are, but it's very important that someone within your operation is staying on top of the current and proposed changes for two very important reasons. The first is that we want you to analyze any changes necessary to your operation for proactively addressing them with no surprises, and second is that you will have the opportunity to provide feedback to the National Organic Standards Board via upcoming listening sessions and comment periods.

At the beginning of 2023, PCO will be unveiling an updated mission, vision, brand statement, and strategic plan, as well as a purpose statement for our Diversity, Equity and Inclusion (DEI) work. Thank you to all who participated in the surveys to collect your feedback and make this process as inclusive as possible. Being an important part of a regulatory process is sometimes challenging, for you and for us, but you are the reason we do this work. We know organic is a better way of business for you, a safer environment for farm workers and animals, and that it can heal people and the planet. Indigenous cultures all over the world have been practicing organic and regenerative ways of living and food production for millennia.

Until all food production returns to these regenerative roots, there will be a need and a place for organic certification to help all of us know what we are getting when we purchase items with the USDA

Equitable access to healthy food and reaching underserved rural and urban communities are high priorities for PCO and NOP.

Organic label. Building on the USDA Organic regulations as the bedrock standards, PCO has also been approved for administering the Regenerative Organic Alliance's ROC (Regenerative Organic Certified™) program. If you are interested in the ROC program, you can find more information on our website. While there are many criticisms of certified organic in our shared space of organic/sustainable/regenerative agriculture, we need to harness the commonalities in our communities to truly transform the industrial food system. We need our collective voice now more than ever. The National Organic Program is a unique partnership, but it can't be as effective as it was intended to be without your voice as part of the process.

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Photo taken at Rodale Institute, Fall 2021 Board Retreat by Diana Kobus.



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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 2022



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COVER PHOTO:
Robyn Jasko, Homesweet Homegrown
Farm, Kutztown, PA.

Vegetable Disease Identification and Integrated Disease Management

Recognizing Signs and Symptoms for Effective Disease Management

BETH K. GUGINO, DEPARTMENT OF PLANT PATHOLOGY AND ENVIRONMENTAL MICROBIOLOGY, THE PENNSYLVANIA STATE UNIVERSITY
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Diseases can be a significant constraint to vegetable production reducing both yield and marketability therefore implementing preventative and proactive management strategies is important. It is also important to be familiar with recognizing the symptoms and signs of diseases common on your crops; to scout and monitor for them throughout the season; know what in-season management tools are available to slow disease development; and evaluate and record results (how successful were you at managing disease this past season) to inform future management decisions.

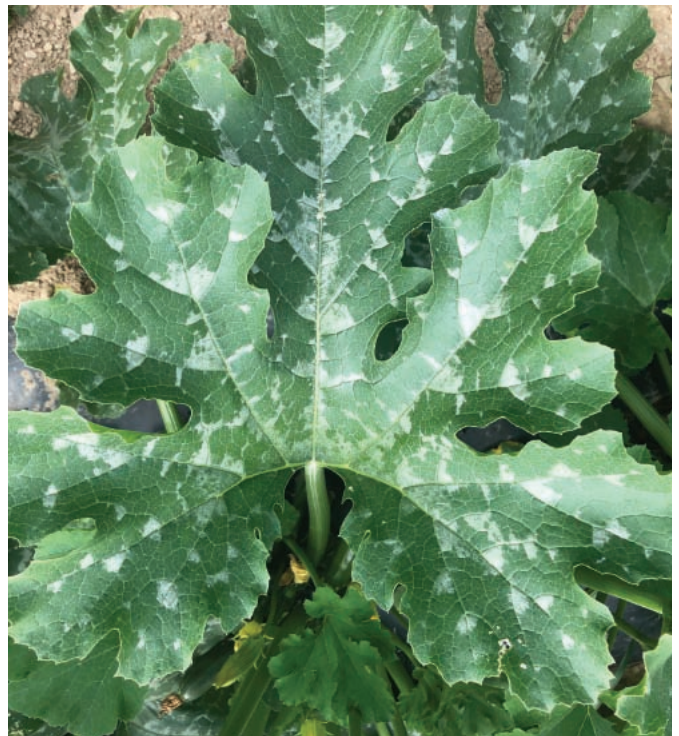
■ **Accurate disease identification** begins with knowing what a healthy plant should look like. For example, some cultivars of pumpkin have silver variegation along the leaf veins that can be confused with powdery mildew (pictured to the right) or the watermelon cultivar Moon and Stars has yellow spots on the fruit. For commonly occurring diseases, understanding a little bit about their biology and the conditions that are most favorable for disease development can aid in diagnostics. Pathogens typically require certain environmental conditions (temperature and leaf wetness) for growth, development, and reproduction. For example, the optimum temperature for bacterial spot development on tomato is 75 to 86°F compared to bacterial speck which is 64 to 75°F but both require leaf wetness for infection and are easily spread by rain splash. Pathogens also have host ranges that can be very narrow and only affect one plant family (e.g. brassicas or alliums) while others can affect over 400 plant species. The larger the host range, the more challenging it is to develop effective crop rotation sequences. The stage of plant growth can also be a factor. For example, early blight and Septoria leaf spot on tomato typically develop with the onset of fruiting compared to cucurbit downy mildew or late blight which can affect their hosts at any growth stage.

There are many resources available to help with disease identification. When submitting samples to the Penn State Plant Disease Clinic (<https://plantpath.psu.edu/about/facilities/plant-disease-clinic>) be sure to include a sample submis-

sion form and provide as much detail as possible. This information helps to narrow down possible causes. For non-PA residents, see the National Diagnostic Network website (www.npdn.org/home) for your nearest plant disease clinic. Also, sign-up to receive electronic or hardcopy newsletters from your local extension service to stay up to date about what diseases are being reported in the area to aid in scouting (more on this later).

Regardless of the disease, for plant diseases to develop, there are three factors that must overlap in a Venn diagram and constitute the **three corners of the disease triangle**: 1) presence of a susceptible host crop; 2) presence of the pathogen and 3) an environment that is favorable for the pathogen. All disease management strategies can relate back to breaking or disrupting one or more of these interactions.

The most effective disease management programs are integrated using multiple tactics to break-up the pathogen lifecycle; a concept known as **integrated pest management** (IPM). IPM focuses on the use of cultural, mechanical, physical, and biological tactics before the use of chemicals and then

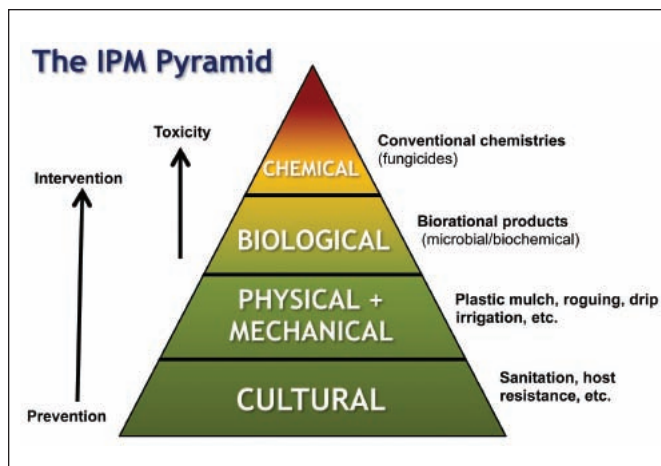




A healthy watermelon cultivar, Moon & Stars, displaying yellow spots but no disease.

within the use of chemicals selection of biorational products over conventional pesticides depending on the production system. This is commonly termed the IPM pyramid. More recently, this concept has been expanded to include additional components related to economic viability, social acceptance and environmental safety as well as placing additional emphasis on pest monitoring and communication not only among growers but also the public. Below are some of components to consider when developing and implementing an integrated pest (disease) management program.

■ **Host plant resistance** is an important tool for managing diseases. Cultivars vary in their morphology, physical and biochemical characteristics making them more or less susceptible to specific pathogens. Resistance does not imply immunity but rather a reduction in potential damage or a delay in disease symptom development thus for diseases reducing disease pressure later the season. Host resistance can be very specific and depend on the strain or race of a pathogen so accurate diagnosis and historical disease records are helpful in selecting cultivars. For example, there are over ten races of the bacterial pathogen that causes bacterial leaf spot on pepper, one of the most common and destructive diseases on that crop. Different cultivars of pepper contain different combinations of resistance genes and thus are resistant to different pathogen races. The X10R peppers contain two resistance genes that confer some level of resistance to all the currently recognized races of



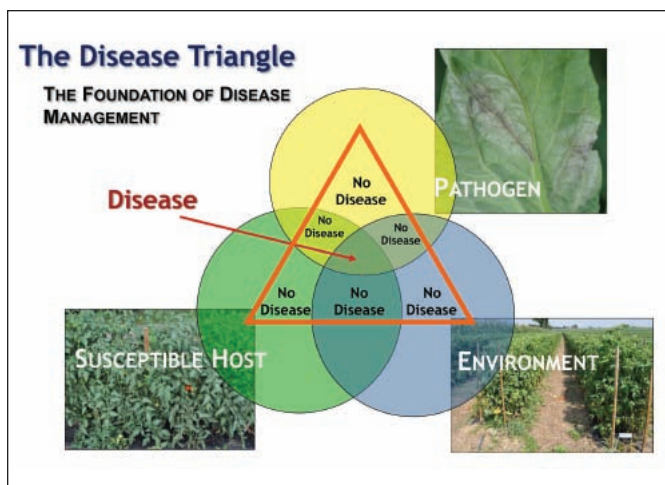
the pathogen however, new races continue to evolve. Compared to downy mildew on basil which does not have races or strains. Rutgers has recently released several basil downy mildew resistant cultivars that should be considered especially for later season planting when disease pressure is much higher. For a list of recommended cultivars for our production region and their corresponding disease resistance see the 2022–23 Mid-Atlantic Commercial Vegetable Production Recommendations (<https://extension.psu.edu/mid-atlantic-commercial-vegetable-production-recommendations-sections>). Also check the seed catalogues for lists of disease resistance traits in different crop cultivars.

■ **Cultural strategies** encompass a lot of preventative best practices that focus on promoting plant and soil health, creating environments that are less favorable for diseases through optimizing plant nutrition, row spacing, reducing leaf wetness and soil splashing as well as sanitation. Sanitation should be considered throughout the production cycle from seed selection and transplant production through the management of post-harvest crop residue. Hot-water treatment is one tactic for seed sanitation which can be effective at eliminating pathogens from the seed surface as well as under the seed-coat. Whether growing your own transplants or purchasing transplants, greenhouse sanitation is also critical. Organic matter and weeds can harbor pathogens production cycles. Keep in mind that pathogens are much more susceptible to high temperatures rather than low temperatures, even polar vortex lows!

Crop rotation with non-hosts also plays a key role in breaking up pathogen lifecycles. Rotations out of plant families for at least 2 to 3 years is recommended however, longer rotations may be necessary for certain soilborne pathogens that can survive in the soil long after the crop residue has been thoroughly decomposed. Crop rotations should also take into account cover crop species as well as predominant weed species. For example, rotating broccoli with forage radish and/or having a lot of yellow mustard in the field would not be a good rotation if *Alternaria* leaf spot was a problem.

Straw and plastic mulch as well as planting into a reduced till or no-till cover crop can help reduce soil splashing onto the crop. They also help to protect direct fruit contact with the soil

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Strengthening Organic Enforcement Proposed Rule

Potential Impacts to Certified Processors/Handlers

CATHY JACKSON, CERTIFICATION PROGRAM ASSISTANT MANAGER

On August 5th, 2020, the United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS) published a Strengthening Organic Enforcement (SOE) Proposed Rule that would expand the organic regulations. **The goal of the proposed rule is to strengthen oversight and enforcement throughout the organic supply chain.** The proposed amendments will close gaps in the current regulations to build consistent certification practices to deter and detect organic fraud. Protecting the integrity of the organic program is critical to reinforcing the value of the organic label.

A wide range of topics are addressed in the proposed rule. Once finalized, the revised regulations will:

- Reduce the number of uncertified businesses in the organic supply chain.
- Strengthen fraud prevention procedures.
- Require the use of import certificates for all imported organic products.
- Standardize organic certificates.
- Increase the minimum number of unannounced inspections.
- Increase inspector qualifications.
- Increase data reporting requirements to make it easier to identify and focus enforcement resources on higher-risk locations, activities and commodities.

Many of these topics significantly affect operations currently certified under the Handling scope, as well as operations not currently required to be certified that engage in organic trade activities.

SOE would reduce the number of uncertified businesses in the organic supply chain by **limiting exemptions from organic certification**. The current regulations exempt some types of business from certification. This creates gaps in the supply chain and makes it harder to monitor and enforce compliance. SOE requires organic certification for all businesses that:

1. Buy, sell, or trade organic products (packaged or unpackaged)

2. Facilitate or negotiate the purchase, sale or trade of organic products (packaged or unpackaged) between buyers and sellers.

This means that businesses currently exempt from certification, such as brokers, traders, importers and exporters, may need to become certified organic if they handle organic products, even if they never physically possess or take ownership of the organic products they help sell or trade. For operations in "private-label" relationships, both the operation that processed the organic product and the operation that sells the product under its own label would be required to be certified. Non-retail operations that sell packaged or unpackaged organic ingredients would also be required to be certified. Some businesses that only perform certain activities, such as retailers, transporters, and warehouses, would still remain exempt from certification. Once the requirements are finalized, all operations engaging in the activities described above will need to obtain certification and operations already certified will need to ensure their organic trade partners are certified per the requirements outlined in the new regulations.

The proposed rule also includes **new requirements for labeling of non-retail containers** used to ship or store certified organic products. The current regulations require non-retail containers to display a production lot number if applicable. SOE requires non-retail containers to display all of the following:

1. The term, "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))," as applicable, to identify the product
2. The statement, "Certified organic by ***, " or similar phrase, to identify the name of the certifying agent that certified the producer of the product, or, if processed, the certifying agent that certified the last handler that processed the product
3. The production lot number of the product, shipping identification, or other information needed to ensure traceability.

These additional labeling requirements strengthen supply chain traceability and may necessitate significant updates to non-retail labels utilized by operations currently certified. Once the requirements are finalized, updated label proofs would

need to be submitted to PCO for review and approval prior to use.

The proposed rule also increases recordkeeping requirements. The current regulations require operations to maintain records that fully disclose all activities and transactions in sufficient detail as to be readily understood and audited. The proposed rule adds that this must include **identification in records of products as "100% organic," "organic," or "made with organic (specified ingredients or food group(s))," as applicable.** Requiring this identification in records supports supply chain traceability.

Another recordkeeping requirement in the proposed rule pertains to traceback audits. The rule requires that the audits conducted at on-site inspection include **verification that organic products and ingredients are traceable by the operation from the time of production or purchase to sale or transport; and that certifying agents can verify traceability back to the source.** This works in conjunction with a certifier requirement outlined in the proposed rule. Certifiers would be required to conduct annual risk-based supply chain audits to verify the organic status of a certified operation's product back to its source(s).

While most of this proposed rule focuses on certification and compliance provisions, clarification of standards is also a critical element of organic integrity.

SOE also **requires the use of NOP organic import certificates for all shipments** of imported organic products entering the United States. This will help the NOP and certifiers confirm that imports comply with the USDA organic standards, facilitate targeted investigations, and increase reporting capabilities. This requirement would affect operations directly importing organic products or receiving imported organic products and the documentation that would be required to be maintained.

While most of this proposed rule focuses on certification and compliance provisions, clarification of standards is also a critical element of organic integrity. The proposed rule provides clarification on calculating the percentage of organically produced ingredients. It clarifies that **the calculation of organic content must be based on ingredients as they are at the time of formulation, not the finished product.** For example, the current regulations state that organic ingredients must be calculated by dividing the total net weight (excluding water and salt) of combined organic ingredients at formulation by the total weight (excluding water and salt) **of the finished product.** The proposed rule states that organic

ingredients must be calculated by dividing the total net weight (excluding water and salt) of combined organic ingredients at formulation by the total weight (excluding water and salt) **of all ingredients.** The intent of this change is to reduce confusion caused by changes to product weights after processing (e.g., cooking, baking, dehydrating) due to loss of water. Once the final rule is published, PCO's Organic Product Profile form will be revised in order to collect updated, more precise formulation information.

In conjunction with organic farms and businesses, certifiers share responsibility for fraud prevention and traceability. There are also several requirements for accredited certifiers outlined in the proposed rule to ensure organic products meet a robust, consistent standard. Some of these requirements are summarized below.

The SOE rule proposes that certifiers issue standardized operation certificates from the Organic Integrity Database (OID). Standardization through OID will simplify verification of valid organic certificates, provide public information in a consistent way on all USDA-certified organic businesses and protect against falsified certificates.

As noted above, SOE proposes that certifiers conduct annual risk-based supply chain audits to verify the organic status of a certified operation's product back to its source(s). This includes developing criteria for identifying products / businesses / farms at high risk of organic fraud, conducting supply chain audits to trace high-risk organic products they certify, and sharing compliance-related information about certified operations with other certifiers. These full supply chain audits will allow certifiers to better detect fraudulent products and trigger enforcement action so that legitimate organic products are delivered to the marketplace.

Because organic inspectors have a critical role in ensuring operations comply with the organic standards, increased inspector qualifications are outlined in the proposed rule. SOE specifies the minimum experience, training and educational requirements for organic inspectors. Defining and enforcing this criteria will ensure that all organic operations are inspected by qualified individuals who apply the organic standards consistently.

The proposed rule also strengthens requirements for on-site inspections. It would require certifiers to conduct unannounced inspections of at least 5% of the operations they certify annually. In addition, the mass-balance and trace-back audits conducted during annual inspections would be required to specifically involve confirming quantities of organic products received match what is sold and verifying a product's source and chain of custody.

Since the proposed rule was published, PCO submitted comments to the NOP to address questions posed by the AMS and to provide our feedback on the proposed text. We also sent notices to our certified operations encouraging them to review the proposed rule and submit public comment as well. We hope any operations with valuable feedback on these pro-

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Strengthening Organic Enforcement

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posed amendments to the organic regulations submitted their comments during the public comment period, which closed October 5, 2020.

The organic community is currently awaiting a final rule to be published. The timeline for publishing a final rule is unclear, but expected in the near future. The final rule will contain an implementation period that describes when businesses will need to comply with the new requirements. Since a final rule has not yet been published, there are no changes to the requirements for certification at this time. However, it may be beneficial to make adjustments to your OSP, recordkeeping system, labels, etc. in preparation for these additional oversight measures. Additionally if you source from uncertified handlers that buy, sell, trade or negotiate sales, you may want to encourage them to begin the certification process now to get ahead of the curve. Alternatively you may also seek out already certified suppliers. Please note that the final rule may be different from the requirements in the proposed rule as outlined above.

Regardless of the details in the final rule, consistent traceability and anti-fraud best practices will help to verify organic products and ensure that consumers are getting the organic products they pay for. **Please contact PCO if you have any questions about the proposed rule and any potential changes to your operation affecting compliance with the regulations.**

Vegetable Disease Identification

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thus reducing potential fruit rots and reducing the need for post-harvest washing of fruit. Roguing symptomatic fruit or plants and sanitation of equipment can reduce the spread of certain diseases such as Phytophthora blight on cucurbits and peppers. Keep in mind that soilborne pathogens can easily be spread between fields and farms on shared equipment.

■ **Invest in your soil's health.** Healthy soils are resistant to degradation and resilient when unfavorable conditions occur. Implementing strategies that improve soil drainage, reduce crusting, poor soil structure, etc. will aid in reducing plant stress and overall susceptibility to disease. Strategies could include reducing tillage in time and space, incorporating more cover crops or soil building crops in the cropping rotation, controlled traffic in the field and/or the addition of organic amendments.

At the top of the IPM pyramid is the application of **in-season products**. For organic production, these include products that are primarily biochemically or microbially based and are most effective when applied preventatively before symptoms are observed. The objective of using these products is to prevent pathogen infection and reduce the production of secondary inoculum for many foliar diseases such as powdery mildew, early blight, and downy mildew, etc. so good coverage is critical. Biopesticides are most effective when used as part of an IPM program. Be sure to store them as recommended on the label and follow label instructions. It is important to continue to scout regularly and check for management failures and keep records.

■ **Knowledge and resources** are important for helping to make informed management decisions. In addition to accurate disease identification described previously, monitoring and scouting are important not only on a field and farm level but also a regional level. There are many resources to help during the season. The Cucurbit Downy Mildew ipm PIPE network (www.cdm.ipmpipe.org) uses confirmed disease reports as well as the forecasted weather to create risk maps to help growers take preventative measures. There is also the USAblight.org (www.usablight.org) network for monitoring where late blight has been confirmed at the county level and what pathogen genotype was detected. This information along outbreaks of other diseases of vegetables are also reported in Penn State Extension and PA Vegetable Grower Association newsletters, pest, and disease alerts and the 1-800-PENN-IPM hotline. Regularly updated disease information is also available at most of the PA produce auctions. Regular scouting, knowing what pests and diseases are being observed in the region and what management options are available are critical components of a successful IPM program.

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PCO – A Legacy of Leadership at 25 Years and Growing

DIANA KOBUS, EXECUTIVE DIRECTOR

Having stepped into my position of leadership at PCO almost 2 and a half years ago at the time this issue lands in your mailboxes, I'd like to acknowledge the many clients, staff, and volunteer leaders that have created and supported PCO's growth over the last 25 years as one of the nation's leading USDA Organic Certifiers. There are way too many to name, but you've seen and will continue to see them featured in pieces that celebrate this milestone. Serving in those long shadows has been a very humbling experience.

I have enjoyed meeting so many of you in my short time here. Always honest, from the strong-minded and sometimes cantankerous to the beginners and constant cheerleaders of what we do, we at PCO value each of you and are motivated every single day by your very hard work delivering healthy, clean food to those of us who depend on you at least three times a day to do just that. Your leadership in the field of agriculture is an example that brings awe and joy to all of us at the end of workdays that are sometimes filled with struggles and seemingly endless paperwork. There is so much of America and beyond that is indebted to your hard work and dedication.

With leadership and direct involvement in the creation of the OPT Grass-fed Standard, as well as being one of the teams of certifiers leading the charge in offering the ROC™ certification, PCO continues to recognize the importance of certifications that go above and beyond the National Organic Program (NOP) for our clients who are positioned to go further.

In order to keep strengthening the NOP, as was intended in its founding, **we also want to encourage you to use your leadership voice** and participate in upcoming National Organic Standards Board (NOSB) meetings by providing your comments and feedback during the appropriate comment periods each year. You can always keep up to date on the items up for review and discussion by watching this publication, our e-news, your client letters, and the USDA website.

It continues to be a great honor for me to serve you all and this legacy of leadership at PCO, and I am always eager to hear from you directly. I would love to hear and share the story of your farm or operation, so please do not hesitate to reach out



to me, the staff, or board members with your valuable insights and lessons learned.

Here's to the next 25 years of leadership, yours and ours *in partnership!*

PCO IS ROC™ APPROVED!

PCO is proud to announce that we are now approved by Regenerative Organic Alliance (ROA) to offer certification to the Regenerative Organic Certified™ (ROC™) program. All Applicants must be USDA Certified Organic, and PCO will be offering this service to our current clients as well as, with a higher cost, to clients whose organic program is managed outside of PCO.

The certification process is slightly different from that of organic certification, in that all interested operations must request and submit an application directly through ROA. ROA does a review for completeness prior to passing along to PCO to complete the rest of the certification process (initial review, inspection and final certification decision).

Based on the time of year and the timeline to review and inspect operations, unless you already have an application into ROA, we likely won't be able to inspect your operation until 2023. If you are interested in this add-on certification, please indicate this on your 2023 Annual Update paperwork.

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Organic Plus Trust (OPT) Grass-Fed Organic Livestock Certification

LAUREN TONTI, OPT PROGRAM DIRECTOR

It has been four years since the launch of the Organic Plus Trust (OPT) Certified Grass-Fed Organic Livestock Program™ when OPT became the first, national standard for grass-fed, organic livestock and handling certification. OPT functions as an end to end, third party certification for the entire supply chain utilizing the strict administrative oversight mechanisms that align with the National Organic Program (NOP). Fourteen accredited organic certifiers participate in the program and provide certification for a total of 477 certified operations as of our 2021 Annual Report.

As a way to enhance the value of the USDA-National Organic Program (NOP), OPT's goal is to raise the trust bar by working with the existing system of USDA-NOP accredited certifying bodies to develop and share innovative tools ensuring compliance and accountability. NOP accredited certifiers can apply to participate in our program to perform OPT grass-fed organic certification as a bundled service to their organic producers. Certified operations receive efficient services including one application, one inspection and review for both their organic and their grass-fed certifications.

In March 2022, I became OPT's first staff member to serve as OPT's Program Director. My focus is to oversee operations, support certifiers, and promote growth of the program. Here are some items we have been working on:

- Launched a database portal where certificates are generated and tracked by OPT
- Website Updates:
 - Enhanced to better promote the brands using the OPT Grass-Fed Organic™ Seal
 - Provide a listing of our accredited certifiers
 - House the standards and program manual
- Hosting training sessions for certifiers while offering guidance on how to consistently interpret the standards.
 - Streamlined the standards and program

manual to ensure clarity for certified operations and certifiers

- Developed one unified Grass-Fed Organic Seal that can be used on all certified products

Most importantly, we developed a transparent and methodical process for standards development that involves those substantively affected by the standards to submit comments to our program. We are looking forward to our first launch of the process to develop the standards in January 2023. The process will involve an open comment period where farmers, certifiers, industry partners, animal welfare advocates, etc. can provide suggested comments to the standard. An advisory committee will review the comments and offer annotated suggestions to be brought forward to the Steering Committee. This process will re-occur annually to maintain standards that are current, stakeholder involved, and safeguard transparency.

Additionally we are excited to develop our marketing efforts to better promote the brands that are certified to the OPT Program. Current brands include Organic Valley Grassmilk, Maple Hill Creamery, Alexandre Family Farm, Lifeway Foods, Family Farmstead and Cream of the Crop. Products certified include milk, yogurt, kefir, buttermilk, half and half, and more. We are still developing a marketing plan that would be implemented in early

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PCO on the Road



Cathy Colley, Diana Kobus, and Gabrielle Rovegno.

■ EDEN HALL FARM – CHATHAM UNIVERSITY: MAY 11, 2022

Pittsburgh based staff, Diana, Cathy and Gabrielle rolled up their sleeves and got to weeding at Chatham University's Eden Hall Farm. They volunteered by prepping beds for transplants, grown for students on campus as well as the Greater Pittsburgh Community Food Bank.

■ RODALE INSTITUTE ANNUAL FIELD DAY: JULY 22, 2022

PCO was invited to attend the annual Rodale Field Day. The PCO tent was staffed by PCO's own Executive Director, Diana Kobus, Stacy Budd and Certification Specialist Crops/Livestock, Alex Restaino. Throughout the day PCO staff connected with farmers, organic stakeholders, industry experts and aspiring growers to share our expertise in organic certification and the process of becoming and maintaining certification.



The event had 16 demonstration stations located around the 386-acre farm. PCO staff explored these extraordinary sites and talked with attendees and Rodale experts. Each demonstration site could be reached by foot or by a tractor pulled, modified hay wagon. Demo sites included organic apple orchards, pastured hog production, treatment-free bee-

Tomatoes in the high tunnel.

keeping, no-till management, farming system trial, soil health & water quality, composting, vegetable systems trial, industrial hemp, farm shares/farmer training, tomato grafting and high tunnel production.

The most notable demo plot visited by PCO staff was "The Rodale Institute Farming Systems Trial," (FST) which is the longest-running comparison of organic and conventional maize and soybean cropping systems in the world and is presently in its 25th season!

■ PCO STAFF RETREAT: JULY 27-JULY 29, 2022

PCO held the first in-person staff retreat since the start of the COVID-19 pandemic. With so much hiring and growth that occurred between 2020-2022 and a fully remote staff, this was the first time the majority of PCO staff members met face to face! Convening in Pittsburgh, staff arrived from Idaho, Florida, Maryland, New York, Ohio and Pennsylvania. One of the highlights of the retreat was a staff visit to Grow Pittsburgh's Braddock Farms.

Grow Pittsburgh is a non-profit organization that works to develop and support food-growing initiatives and programs across the greater Pittsburgh region as a "keyway to improve the social, economic, environmental, health, and educational realities of people in our community." In practice, Grow Pittsburgh has three commercial growing sites with farmers market sites to sell produce, a Garden Resource Center which provides residents with tools, materials and knowledge for gardening on their own, as well as support for community gardens. In addition they have opportunities for all community members to learn how to grow their own food through school programs,



Pennsylvania Secretary of Agriculture speaking to PCO and Braddock Farms Staff.



From left: PCO Staff Elizabeth Leah, Lia Lopez, and Alex Restaino Volunteering at Braddock Farms in Pittsburgh.

summer employment programs for high-schoolers, as well as pathways for those interested in making agriculture a career.

Executive Director of Grow Pittsburgh and PCO Board Member, Denele Houghson, welcomed PCO staff and Pennsylvania Secretary of Agriculture Russell Redding, as well as additional Pennsylvania Department of Agriculture staff to Braddock Farm's urban farm. Braddock Farms sits in the foreground of the Edgar Thomson Works of the U.S. Steel Corporation, one of the only remaining U.S. Steel works in the greater Pittsburgh area. The image is the perfect juxtaposition between the old economic driver for the region, as compared to a new, greener, healthier and equitable future for the city. Secretary Redding spoke to the group about the importance of urban growing initiatives for food access, environmental quality and economic opportunity. Braddock Farms Manager, Nick Lubecki gave the group a farm tour and put PCO staff to work around the farm. It was a great opportunity for PCO staff to roll up their sleeves together and connect!

■ AG PROGRESS DAYS: AUGUST 9-11, 2022

Ag Progress Days remains Pennsylvania's largest outdoor agricultural exposition and features approximately 400 exhibitors from 30 states. The three day annual event draws an estimated crowd of 46,000 attendees that are eager to participate in the many different workshops the event has to offer. Between the 80+ acres of crops and machinery demonstrations to the 55 acres of indoor and outdoor exhibits, there really is something for everyone at this event.

Technical staff members were present to talk with attendees about becoming certified organic and about PCO as an organization. It was also great to re-connect with PCO certified producers in attendance. It is always wonderful to see our community of growers out on the road with us sharing and networking. In addition, PCO partnered with Sam Malriat, from the Rodale Institute, for two educational break-out sessions during the three day event. During these sessions PCO and Rodale discussed breaking down some of the barriers and stigmas associated with becoming certified. Topics discussed included cost, paperwork, inspections, and viable markets for producers. Our goal was that those in attendance left with the knowledge and resources that organic certification is not a daunting or scary undertaking!

■ USDA FARMER'S MARKET WASHINGTON D.C. – SEPTEMBER 9

Tina Ellor, Technical Director at Phillips Mushroom Farm and Katie Poppiti, PCO Certification Specialist, volunteered at the USDA Farmer's Market with the American Mushroom Institute (AMI). The market, located outside the USDA headquarters along the National Mall, runs from May through October. Each week the USDA highlights a different commodity for consumer education through a program called "VegU." Since September is "National Mushroom Month" mushrooms were featured that week. Phillips Mushroom Farm provided a beautiful display of fresh mushrooms for the event. In addition, AMI cooked a delicious mushroom chili and provided mushroom "jerky" samples for attendees. Tina participated as the guest speaker, giving a few ten minute mini classes on growing, prepare, storing, and the health benefits of mushrooms for "VegU." Secretary of Agriculture Tom Vilsack and Second Gentlemen Doug Emhoff made a surprise appearance at the market and stopped by to discuss all things mushrooms!



Tina Ellor with mushroom display at the USDA Farmer's Market tent.

■ NATURAL PRODUCTS EXPO EAST – SEPTEMBER 21-24

Kyla Smith, PCO Certification Director, served on a speaking panel at the Natural Products East Expo held in Philadelphia, Pennsylvania. The panel discussion focused on organic regulatory updates.

Speaker Panel from Left:
Kyla Smith (PCO Certification Director), Jennifer Tucker (USDA National Organic Program), Nate Powell-Palm (Cold Springs Organics), Tom Chapman (Organic Trade Association).



Standards and Policy Update

KYLA SMITH, CERTIFICATION DIRECTOR

ORIGIN OF LIVESTOCK: WHAT YOU NEED TO KNOW TO IMPLEMENT ON YOUR FARM

The National Organic Program (NOP) published a final rule, effective on June 6, 2022, that amends the Origin of Livestock (§205.236) section of the USDA organic regulations. This rule change aims to increase uniformity in origin of livestock production practices for organic dairy animals, and reduce variances between the approaches taken by certifying agents related to how organic dairy animals are brought into organic production.

Specifically this rule will require that:

- Organic milk and milk products must be from animals that have been under continuous organic management from the last third of gestation onward, with an exception for newly certified organic livestock operations (where a 1-

time transition may apply – see next bullet point).

- Operations may transition to organic production on a one-time basis, and once the transition is complete, the operation must not transition additional nonorganic animals to organic production or source transitioned animals.
- The transition must occur over a single 12-month period and all transitioning animals must end the transition at the same time.
- After the transition to organic production is complete, an operation is not allowed to transition additional nonorganic animals to organic milk production, and the certified operation may not source animals transitioned by other operations.
- After the transition, an operation replacing culled dairy animals and/or expanding its number of dairy animals must add dairy animals that have been under continuous organic management from the last third of gestation.
- Temporary variances will be available to allow the movement of transitioned animals between operations for spe-

OOL in Practice

From USDA Infographic: Origin of Livestock
(www.ams.usda.gov/sites/default/files/media/OOL_factsheet.pdf)

New or transitioning dairy operations may:

- Purchase or raise organic animals, or
- Transition nonorganic animals to organic production **ONCE**.



Once certification is complete:

- The operation may only add animals that have been organically managed from the last third of gestation.
- The operation cannot source transitioned animals from another operation.*

**Some small businesses may be granted limited exceptions by the AMS Administrator*



cific reasons such as bankruptcy, insolvency, and intergenerational transfer. These variances are only for businesses that are “small,” as determined by the Small Business Administration (SBA) in the small business size regulations (13 CFR part 121) and will follow the already established temporary variance request process.

While the rule was effective beginning on June 6, 2022, operations do have some time to come into compliance with the requirements outlined above. The rule established a compliance date of April 5, 2023, meaning that operations that were certified when the rule was published have until April 5, 2023 to comply with these requirements – the biggest change being the prohibition on the purchase of transitioned animals. This means that up until April 5, 2023 certified operations can continue to purchase transitioned animals. After April 5, 2023, all animals that are purchased must have been managed organically from the last one third of gestation.

In order for operations purchasing organic replacement animals and PCO to verify animals being sold and purchased is being done in accordance with these new requirements, operations will need to keep detailed herd lists showing whether animals have been under continuous organic management from the last third of gestation or were a transitioned animal. PCO will be sending out a new Herd List template with annual update paperwork, if applicable to your operation. There will be further instructions and explanations sent later this year with your annual update paperwork for completion of the new herd list. However, you can begin to prepare now to complete this more thorough and detailed account of your animals.

Contact your Certification Specialist if you have any questions on how this regulatory change impacts your operation.

NOP PUBLISHES ORGANIC LIVESTOCK AND POULTRY STANDARDS PROPOSED RULE: COMMENT PERIOD EXTENDED TO NOVEMBER 10TH

The National Organic Program (NOP) published a proposed rule that would amend the USDA organic regulations regarding organic livestock and poultry production requirements by:

- Adding new provisions for livestock handling and transport for slaughter and avian living conditions; and
- Expanding and clarifying existing requirements covering livestock health care practices and mammalian living conditions.

The NOP extended the comment period and will now accept written comments on this proposed rule until **November 10, 2022**. See below for instructions to submit comments and specific questions NOP is seeking responses on. This is a great opportunity for you to add your voice to this rulemaking process (which is quite unique to the organic regulatory process). USDA reads every comment that is submitted during the proposed rule process and incorporates them or provides rationale for not including them when publishing the final rule. This is by no means a pointless exercise. Your voice and your comment matter – public comments do and have in the past impacted the final outcome of rulemaking.

The reach of this rule is fairly significant on the operations that are likely to be impacted. The proposed rule may affect the following stakeholders (not an exhaustive list but identifies key entities likely to be affected by this action):

- Individuals or business entities that are considering organic certification for a new or existing livestock farm or slaughter facility;
- Existing livestock farms and slaughter facilities that are currently certified organic under the USDA organic regulations; and
- Certifying agents accredited by USDA to certify organic livestock operations and organic livestock handling operations.

The NOP issued a similar rule in 2017 that was withdrawn. This 2022 proposed rule is almost identical. Below is a description of the proposed changes to the current regulations:

Definitions

- Proposes to add seventeen new terms to §205.2 including: beak trimming, caponization, cattle wattling, de-beaking, de-snooding, dubbing, indoors or indoor space, mulesing, non-ambulatory, outdoors or outdoor space, perch, pullet, ritual slaughter, soil, stocking density, toe clipping and vegetation.
- Two of more important definitions are that of indoor or indoor space and outdoor or outdoor space. The use of the term “enclosed” is an important differentiator as is how the space is being used.
 - The NOP is seeking feedback on if these two definitions are clear and allow for consistent implementation of indoor and outdoor space requirements.

Livestock Health Care Practice Standard

- Proposes that operations demonstrate **feed ration sufficiency** through appropriate body condition of livestock being monitored by the operator and verified during inspection.
- Proposes certain requirements related to **physical alterations**, specifying by whom, why and when they are to be performed. In addition certain physical alterations are proposed to be restricted (e.g. needle teeth clipping), while other are proposed to be prohibited (e.g. Avian species: de-beaking and de-snooding, caponization, dubbing, toe clipping of chickens, toe clipping of turkeys unless with infra-red at hatchery, beak clipping after 10 days of age and Mammalian species: tail docking of cattle, wattling of cattle, face branding of cattle, tail docking of sheep shorter than the distal end of the caudal fold and mulesing of sheep.
- Proposes certain requirements to **surgical procedures and the administration of drugs**, other than vaccines
- Further clarifies when **milk from an animal treated with an allowed substance** in §205.603, which has a withhold-

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Standards and Policy Update

continued from page 13

ing time, may or may not be sold, labeled, represented or used to provide milk to calves as organic during that withholding time

- Proposes the prohibition of **forced molting** or withdrawal of feed to induce molting
- Proposes the **prohibition the following methods of euthanasia**: suffocation, manual blows to the head by blunt instrument or manual blunt force trauma, and use of equipment that crushes the neck (e.g., killing pliers or Burdizzo clamps).
- Proposes **additional monitoring and recordkeeping** related to herd health records, euthanasia plans, ammonia levels, parasite control plans, temporary confinement records and transportation.

Mammalian Living Conditions

(separating from avian living conditions)

- Proposes that **shelter** must allow for animals to feed simultaneously, room to move, stretch limbs and lie down (over 24 hour period).
- Proposes certain requirements related to **indoor space areas** (e.g. tie stall and freestall barns, group housing) depending on animal species and age of the animal
- Proposes certain requirements for **outdoor areas** such as when the area includes soil, then maximal vegetative cover must be maintained as appropriate.
- Proposes further clarification related to **temporary confinement allowances**

Avian Living Conditions

(separate from mammalian living conditions section)

- Proposes **minimum indoor and outdoor space requirements (e.g. stocking densities)** that are species and age dependent.
- Proposes certain **requirements for indoor space areas**: to allow birds to move freely and exhibit natural behaviors; restricts artificial light usage; exits distributed appropriately; specifications for floor types and perch space.
- Proposes certain **requirements for outdoor space areas**: designed to encourage birds to use and be provided at an early age; restricts type of ground allowed (50% soil cover with maximal vegetative cover and 50% of the outdoor area may be gravel, concrete or surfaces other than soil with vegetative cover; **prohibits porches** that are enclosed from being calculated as outdoors.
- Proposes **specific parameters related to allowed temporary confinement** reasons for extreme temperatures (e.g. below 40F or above 90F) and other inclement weather, for birds to become fully feathered (e.g. 4 weeks for broilers and other meat birds and 16 weeks for pullets),

documented disease outbreak in region or migratory pathway, reseeding of outdoor space, treatment of illness or injury, sorting and shipping of birds and poultry sales, nest box training (not to exceed 5 weeks over the life of the bird) and youth projects (e.g. 4-H and National FFA)

Transportation and Slaughter

- Proposes additional requirements related to **identification and traceability during transport**.
- Proposes additional **requirements related to animal health and transportation** or slaughter.
- Proposes certain **requirements to the transportation environment** (e.g. ventilation, bedding), **length of transportation** and the need to provide organic feed and water if travel time exceeds 12 hours.
- Proposes that operations be in full **compliance with existing humane handling and slaughter laws** and provide any records of noncompliance and corrective action documents during annual organic inspection.

Implementation and Compliance Dates

	Time from Effective Date of the Final Rule	
All Provisions – except for broiler/eggs (listed below)	1 year	
Broiler Operations’ indoor space	3 years	
Egg Operations’ outdoor space	Option 1	Option 2
• Operations certified prior to the effective date	5 years	15 years
• New entrant certified within 3 years after effective date	5 years	5 years
• New entrant certified more than 3 years after effective date	Immediate	Immediate

Instructions for Submitting Comments

Comments must be received by 11:59PM ET November 10, 2022 and must reference the docket number AMS-NOP-21-0073. Submit written comments online via www.regulations.gov, or by mail to Erin Healy, MPH., Director Standards Division, National Organic Program, USDA-AMS-NOP, Room 2646–So., Ag Stop 0268, 1400 Independence Ave. SW., Washington, DC 20250–0268.

AMS is specifically seeking comments on the following topics:

1. Do the proposed amendments provide enough clarity to farmers, handlers, and certifying agents to be able to comply with the proposed requirements?
2. Do the proposed definitions clearly and adequately distinguish “indoor” and “outdoor” spaces? Do the definitions sufficiently address spaces that may be enclosed by fences and/or overhead netting?
3. How can organic producers provide poultry exit doors for meaningful outdoor access while simultaneously pre-

venting animals (that could introduce or transfer Salmonella) from entering poultry houses?

4. Do the assumptions and estimates outlined in the Regulatory Impact Analysis and Regulatory Flexibility Analysis accurately reflect the current practices and production rates among organic poultry and egg producers? Specifically, to what degree do the proposed requirements align with third-party animal welfare certification programs and current industry practices? Are assumptions about welfare surplus valid? Is the period of analysis and the estimates about the useful life of a poultry house appropriate? Are AMS's benefit estimates for broilers appropriate? Are AMS's cost estimates for small producers accurate? Are AMS's estimates for the paperwork burden accurate?
5. Do the proposed amendments to § 205.239 related to mammalian livestock reflect current practices among organic mammalian livestock producers or impose new requirements on these operations?
6. What is an appropriate and feasible implementation timeframe for the proposed changes? Specifically, AMS seeks comment on the following implementation approach and timeframes as outlined in the Implementation and Compliance Dates table listed above. Additionally, AMS seeks comments on alternative timeframes to those presented above for the outdoor space requirements for layer operations, including justification for alternatives and data on the costs and benefits. These options and their costs and benefits are discussed in Section V ("Executive Orders 12866 and 13563 – Executive Summary"). Detailed information can be found in the Regulatory Impact Analysis for this proposed rule.
7. Does market failure and consumer confusion exist in regards to organic animal welfare practices?

Organic Plus Trust Certification

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2023 and we welcome feedback! We are planning to encourage more brands already certified organic and marketing as grass-fed to become OPT Grass-Fed Organic Certified.

OPT Grass-fed Organic Certification offers farmers the opportunity to have a third-party stamp on farming practices that are climate smart, healthier for soil, livestock and people and provide higher price premiums on the grass-fed organic claim. Often farmers who participate with a milk handler or co-op receive technical assistance such as pasture audits, animal nutritionist consultations and other specialists helping to address any milk quality challenges.

OPT has shaped the grass-fed organic industry, particularly by offering third-party certification in a landscape where the term grass-fed is used widely without oversight. Organic dairy farmers managing with holistic, pasture-based principles receive higher price premiums on their OPT Certified Grass-fed organic milk, improve natural resources and soil health through intensive grazing practices and produce high quality

8. Does OPFA authorize these regulations on animal welfare and livestock production practices?

The Organic Trade Association (which PCO is a member of) has put together a toolkit for livestock operators (<https://ota.com/2022-olps-take-action-toolkit-livestock-sector>) with great resources to help operations further understand the impacts to their operation as well as templates for comments. Please utilize this or other resources to aid your understanding of these proposed changes and how to effectively submit a comment on this topic to NOP. If you'd like a hard copy of the full rule, the OTA survey or have any questions on the proposed changes and how to submit a comment, please reach out to Kyla Smith (kyla@paorganic.org or 814-422-0251 x216).

NOP EXTENDS COMMENT PERIOD ADVANCE NOTICE OF PROPOSED RULEMAKING ON INERTS

The National Organic Program originally published the ANPR on Inerts on September 1, 2022. This notice seeks comments on options to update how the National List of Allowed and Prohibited Substances (National List) references inert ingredients in pesticides allowed for organic production. The comment period is being extended by 60 days. The submission deadline is now December 31, 2022.

Instructions for Submitting Comments: Comments must be received by 11:59PM ET December 31, 2022 and must reference the docket number AMS-NOP-21-0008-0001. Submit written comments online via the link <https://bit.ly/PCOInertsComment>

If you'd like a hard copy of the rule or have any questions contact Hector Nunez (hnunez@paorganic.org or 814-422-0251 x284).

milk with nutritional benefits. According to a peer reviewed study by the Journal of Science and Nutrition, milk from organic, grass-fed cows has more omega-3, higher levels of conjugated linoleic acids (CLA) and an improved ratio of fatty acids which offer a unique variety of human health benefits. It has been exciting to watch the program grow during the last 4 years. In 2021 we saw 10% growth in certified operations from 2020 and we are seeing continued growth in 2022.

We encourage you to check our website at www.organic-plustrust.com to learn more and read our standards and program manual. Any certifier wishing to apply for OPT Accreditation can do so on the Portal page of our website. Any certified organic operation interested in becoming OPT Grass-fed certified can check the Certification page on our website to see if your certifier is listed. If not, I would be happy to talk to any accredited organic certifier about becoming accredited to the OPT program.

Please feel free to contact me directly with any questions at ltonti@organicplustrust.com or by phone at 1-202-596-5592 extension 726.

Board Corner

Message from the President

JOE MILLER, BOARD PRESIDENT



Once a year, the PCO Board convenes for two days for our fall board meeting, retreat programming, and to spend extra time together to work on the future of PCO. Last year we met at Rodale Institute, where they were kind enough to let us enjoy the atmosphere of their farm and get some good work accomplished. As a board we look forward to being there again this year. PCO has been revitalizing our business from the ground up, last year revising our articles and bylaws (and board structure), and this year revising our mission, vision, and strategic plan, as well as formulating a purpose statement for our Diversity, Equity, and Inclusion (DEI) work. We've done all of this with significant effort spent to include the feedback of clients, staff, key stakeholders, advisors, and finally the PCO Board, whose responsibility it is to set the strategic direction of the organization. All of these groups working together as partners are essential to our success.

Throughout our history, PCO has been blessed with terrific partners. From our founding farmers, past board members, to the staff at the USDA National Organic Program, we have been supported and challenged by understanding that our organization (and our world) can be better tomorrow than we are today. We continue to look for the feedback and guidance from those partners and everyone who takes the time to reach out to us. As a PCO board member, it's been a joy to watch the board come together to face difficult challenges and to support the PCO leadership in their growth and success. Through these efforts we all have grown as individuals and as a team. The PCO board is and has been made up of leaders from a diverse variety of the organizations. This diversity in experiences has been crucial to giving us new ways to look at problems and opportunities in a way that takes advantage of the situations we are in.



Joe Miller, Denele Hughson, and Sam Malriat participating in team building activity at 2021 PCO Board Retreat & Meeting at Rodale.

Inset below, from left: Joe Miller, Denele Hughson, Diana Kobus, and Katherine DiMatteo volunteering at Braddock Farms.

I would like to thank the leadership and Executive Director at PCO for their support of our board's efforts. Without their commitment to excellence and partnership in everything they do, we would not be successful. Recently their commitment to partnership has been recognized by leaders in our industry including those at the USDA and the National Organic Program. Congratulations to PCO on being a partner of PASA's in the Climate Smart Grant.

Our team at PCO understands their role not just as a service provider, but as a partner in your business. With the addition of a new Client Services Team (CST) to handle client inquiries, and an expanded certification staff, decisions are being made with our clients in mind, including continuing to offer Grass Fed (OPT) Certification and now the Regenerative Organic Certified (ROC) program.

How else can we be a good partner? Send your feedback to me or our Executive Director. We want to hear from you. You can also keep an eye out for our annual client survey as we close 2022. Your feedback is reviewed and essential for decision making in 2023 and beyond.

Sincerely,

Joe Miller, joehasit@gmail.com • 717-385-4610

Dear Aggy



Manure as a Fertility Input

Dear Aggy,

We just moved onto a new farm, and I have nearby farms offering me their manure. I'd like to use manure as a fertility input for the hay fields on my farm, as we don't have much livestock ourselves. What do I need to be watching out for?

— Mark M.

Dear Mark,

Livestock manures are an important resource in organic crop production, especially combined with a whole farm fertility plan that includes crop rotations and cover cropping with nitrogen-fixing legumes. Use of raw manures can sometimes increase weed problems. Some manure contains weed seed from bedding materials like straw and old hay. Composting manure will minimize viable weed seeds, as well as stabilize nutrients.

Records must be kept on application dates and rates for all manures. Manure should not be applied on frozen ground. Raw animal manure must be composted unless it is: 1) Applied to land used for a crop not intended for human consumption; 2) Incorporated into the soil not less than 120 days prior to the harvest of a product whose edible portion has direct contact with the soil surface or soil particles; or 3) Incorporated into the soil not less than 90 days prior to the harvest of a product whose edible portion does not have direct contact with the soil surface or soil particles.

Call the PCO office for a copy of our Guidance Document on Manure, Compost and Compost Tea for details on the restriction for raw manure.

OFF-FARM MANURE SOURCES

The source or origin of manure is not restricted according to the National Organic Program, but regulations at 7 CFR § 205.203(c) do require that manure must not contribute to contamination of crops, soil, water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Some conventional manure sources could contain synthetic additives, such as Neporex (a synthetic fly larvicide), which may leave detectable residues in your crops. It is a good habit to be familiar with the supplier of your off-farm manure, and for you to determine what, if any, products may have been applied to it.

ON-FARM MANURE

Manure pit additives are a popular way to not only decrease odor from stored liquid manure, but also stabilize nutrients and liquefy it for easier handling. Pit additives generally consist of a combination of bacteria and enzymes which liquefy solids and decrease ammonia levels during the anaerobic phase of manure decomposition. If you would like to use manure treatments, they must be reviewed for compliance by PCO before you use them. PCO will need to verify that any microbial ingredients are non-gmo, and that other ingredients are non-synthetic.

You'll find approved manure treatments on PCO's list of Approved Materials under the Crop Production Aid – Compost/Manure Additives Category.

Sincerely, Aggy

Inputs only registered with EPA

Dear Aggy,

I'm confused. I bought a pesticide product that is not only OMRI listed, but even has the EPA "For use in Organic Gardening" on the label. Yet I just heard from PCO that using this product is not in compliance. Can someone please explain?

— Confused Carl

Dear Mr. Carl,

I certainly understand your confusion. There are fortunately just a handful of products by a single manufacturer, Bonide, that fall in this category.

Generally, OMRI listed pesticides are Environmental Protection Agency (EPA) registered for commercial use by the manufacturer. In this instance, however, this manufacturer has chosen to only register the products with the EPA "For Home Garden Use Only." Label directions state: "For residential use in home gardens, lawns and ornamentals. Not for use on plants being grown for sale or other commercial use." Following EPA label instructions therefore requires that these products are **not** used on a commercial scale. It's a good reminder to always read the product label and verify that it is being used in a compliant manner. Since PCO only provides compliance information to commercial organic producers, our published lists only include those products that are allowed for use in commercial production. OMRI also provides information to home gardeners, and will list both commercial and "For Home Garden Use" pesticides.

If you are unsure whether a product you are interested in using is allowed for use in your operation, please do not hesitate to contact PCO.

Sincerely, Aggy

PCO Core Values in Action

Living our Core Values

DIANA UNDERWOOD, DIRECTOR OF OPERATIONS

"It's about the journey, not the destination." I'm sure we have all heard variations of this quote through the years and while this can be true at times, other times both the journey AND the destination are important. PCO's focus on enacting our core values through our work on diversity, equity, and inclusion (DEI) places a focus on both how we get there (the journey) and where we are going (the destination).

So far, our DEI journey has taken us through several iterations of training. These instructional classes, led by an outside facilitator, fulfilled several important purposes: support the current work of our core values, expand our knowledge to apply in our day to day work, and set a foundation for discussion and action on addressing social injustices. At the conclusion of our training, we shifted our focus to better understand why this work was important to us as an organization so we could ultimately take steps towards action. The journey represents our training, learning, and growth with respect to DEI and while that

will continue, we can now add a focus on the actions and outcomes for that work – the destination. Stay tuned for the next issue where we will share what we learned, where we are going with respect to DEI, and most importantly WHY!

In the meantime, our values continue to guide us not only in significant movements toward social justice but also in our day to day interactions, with each other and with others. Our core values do not serve just one of our many stakeholder groups, ultimately they recognize the interdependent relationships between ALL our stakeholders: certified clients, supporters and members, PCO staff and contractors, partner organizations, the community and environment. So it is this entire stakeholder group that must be considered when we apply our values in our day to day work.

- **Keep people at the center of every action, interaction and decision** (*Provide Support*).
- **Promote restorative practices that improve the world for future generations** (*Engage Stewardship*).
- **Embrace transparency and integrity in all our work** (*Cultivate Trust*).

As PCO grows and changes, attention to our core values including diversity, equity, and inclusion becomes even more important in supporting all of us now and in the future. This is important work to our organization, our industry, and society as a whole. Learning, growing, and improving are all part of advancing the organic industry and all communities worldwide.

You can read more about the action steps we strive to model by visiting our Mission, Vision, and Values page on our website: <https://paorganic.org/about/mission-vision-and-core-values/>

Job Opportunity with PCO

Pennsylvania Certified Organic (PCO) announces a job opening for a Certification Specialist. The Certification Specialist serves as the primary contact between PCO and our certified organic clients. This position focuses on assessing and determining compliance of each operation's organic system plan with organic regulations, evaluating inspection reports and writing/issuing reports to clients, providing customer service, and working collaboratively within the Certification Review Team. If qualified and interested, Certification Specialists may also conduct inspections. This position is primarily remote office-based with some minimal travel exceptions. The ideal candidate will have education and or experience in the following areas: familiarity with regulatory compliance and organic certification, knowledge of organic standards, agriculture (crops and livestock), food science or processing, and organic regulatory inspections. We are looking for a well-organized and self-motivated person to join our team-oriented environment at PCO. This is a full remote telecommuting position.

PCO is a growing non-profit organization that works with organic farmers and food producers across the US.

PCO provides organic certification services to approximately 1700 operations and employs 34 staff and sub-contracts with 40 field inspectors. Our team is dedicated to our mission: to ensure the integrity of organic products and serve our farming community.

This is a full-time, exempt, Telecommute position. Salary range: \$47,500 to \$58,000, depending on experience.

Visit: www.paorganic.org/jobs to view a job description.

Benefits: health, dental, vision, disability, and life insurance; Simple IRA, generous holiday, volunteer time, vacation, paid time off, and paid leave.

This position will remain open until **Monday, November 7th**. Please submit a resume and cover letter to "PCO Job Openings." Our hiring team will review all applications. Please do not contact PCO about your application status.

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

All times listed are Eastern Time Zone unless otherwise indicated.

New Faces



Anna Sekine *Certification Specialist*

Anna joined the PCO team as a Certification Specialist in September 2022. She holds a Bachelor of Arts in Sociology from Indiana University and a Masters in Food Studies with an emphasis in sustainable agriculture from Chatham University. Prior to joining PCO, Anna worked as a Certification Specialist at

the Ohio Ecological Food and Farm Association, a Farm Director for a PK-12 school in Pittsburgh, Pennsylvania, and a Research Assistant for the Center for Regional Agriculture, Food, and Transformation. In her free time, Anna enjoys spending time with her partner and loved ones, hiking, cooking, rock climbing, and cuddling with her three kitties.



Lee Blahato *Inspection Program Coordinator*

Lee joined the PCO team as an Inspection Program Coordinator in August 2022. She is originally from San Francisco, CA, but has lived in Alberta, Utah, Colorado, and Florida before settling in the beautiful state of Idaho as home. She holds a Bachelor's degree in Biology and Environmental Studies, and is currently

pursuing a masters program in Environmental Science. She spent 8 years working for parks departments across the country and, prior to joining PCO, worked for the Idaho State Department of Agriculture in organic inspections and certification. She is curious and passionate about science and, in particular, where nature and agriculture meet – organics! In her free time, she enjoys a wide range of hobbies including gardening, fishkeeping, playing a wide array of instruments, and spending time with her husband, dog, cats, and ferret.

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New Members

*PCO Welcomes 3rd Quarter
New Members!*

NEWLY CERTIFIED ORGANIC

Acorn Hollow Farm

Petersburg, PA

Barry and Sadie Brubacker

El Dorado Springs, MO

Brian Jenkins

Lexington, VA

Clara Todt

Hanover, PA

Clement Brubacker

Liberty, KY

Dan DeTurk

Mohrsville, PA

Daniel L. Swartzentruber

Emlenton, PA

Denise Staub

East Berlin, PA

Eli Yoder

Millersburg, OH

HomeFields Inc.

Millersville, PA

Jonathan D. Swarey

Belleville, PA

Limerick Homegrown Produce & Trading Post LLC

Schwenksville, PA

Little Croft Farm, LLC

Harleysville, PA

Mark A. Schmidt

Rimersburg, PA

Merrick Farm, LLC

Farmingdale, NJ

Nathan Hoover

Lewisburg, KY

Oak Grove Produce Co-Op

Lowville, NY

Reuben J DeMaster

New Tripoli, PA

Samuel F. Stoltzfus

New Paris, PA

Stonehaven Organics LLC

Mansfield, PA

Stone Road Farms, LLC

New Oxford, PA

Tluang Thang and Thang Thluai

Elkland, MO

Todd Propst

Annville, PA

Troyer Growers, Inc.

Waterford, PA

Turkeyfoot Farms LLC

Markleton, PA

Walnut Acres Foundation

Middleburg, PA

Willow Creek Farm

Collegeville, PA

BUSINESS MEMBERS

ClearH2O

Westbrook, ME

Cropland Solutions

Edmonton, Alberta CA

Seneca Farms Biochar LLC

Odessa, NY

STAY CONNECTED,
VIST:
paorganic.org

Certification Update

Cathy Jackson
Certification Program Asst. Manager



ORGANIC COST SHARE APPLICATIONS DUE OCTOBER 31

All certified operations are eligible to receive reimbursement for certification costs and fees under the Organic Certification Cost Share Program (OCCSP). On top of that, certified operations and transitioning operations can receive additional reimbursement through the Organic and Transitional Education and Certification Program (OTEC). To find out more or request supporting documents for your application, please visit the PCO Website.

INTERNATIONAL TRADE UPDATES

The U.S.-India organic recognition agreement transition period has ended. As of July 13, 2022, all organic products imported to the United States from India must be certified to the USDA organic regulations by a USDA-accredited certifying agency. This requirement applies to all operations in the supply chain. Certified USDA organic products imported to the U.S. from India must now be accompanied by a NOP Import Certificate.

For exports from the U.S. to Taiwan under the U.S.-Taiwan organic equivalence arrangement, PCO must verify if the exported shipment will be trans-shipped through Canada. Products trans-shipped through Canada may be allowed as long as they were produced and/or packed in the U.S. and not further handled until arrival in Taiwan. An additional attestation statement on the TM-11 export certificate is required for these types of shipments.

For exports from the U.S. to Korea under the U.S.-Korea organic equivalence arrangement, the organic certificate and address of the last facility where the product was processed

must be provided for each export certificate (even for exports by a private label operation).

PRODUCT REVIEW PROCESS UPDATE

Operations certified to the Handling scope often submit requests for new or updated products and labels throughout the year. These requests should be sent directly to your Certification Specialist. Your Certification Specialist may forward your request to our new Client Services Team for review. The staff member conducting the review will contact you to request additional information or confirm approval. Product review requests are reviewed within 10 business days. Expedited reviews (\$225 per product fee), will be reviewed within 5 business days.

PCO WEBSITE RESOURCES

A variety of resources are available on our website. Supplemental forms (Product Profile, Materials Used Form, Field & Crops Form, etc.), guidance documents (including our new Organic Labeling Guide), and several versions of the PCO logo (must be submitted to PCO for approval prior to use) are available at: <https://paorganic.org/certification/already-certified/>

Materials Update

Hector Nunez C.
Materials Program Assistant Manager



MATERIAL REVIEW STATUS CHANGES

PCO added additional staff to support your material reviews requests. Understanding the needs of the organic industry and agriculture has been a valuable asset for PCO over our history together. We keep people at the center of every action, interaction, and decision. This helped us understand that the material review requests are taking longer than we would like and a timely response is something that we rec-

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)
	Single	4 Issue Sub.	
Back cover (in color)	\$572	na	8.5 × 9
Full Page	\$362.50	\$1,232	8 × 10
Half Page	\$242.50	\$824	7 × 4.5 (horizontal) 3.25 × 8.75 (vertical)
Quarter Page	\$152.50	\$518	3.25 × 4.5 (vertical)
Eighth Page	\$112.50	\$382	3.25 × 2.25 (horizontal)

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 or call the PCO Office at 814-422-0251.

ognizeis important for you. Four Contractor Material Specialists were added and trained to assist in the requests of our operations. We are hoping to see an improvement in material review requests in the upcoming months. We appreciate your patience.

The Organic Materials Review Institute, OMRI, has released a Fall 2022 update. "In May 2022, the OMRI Board voted that the review of sanitizers, disinfectants and cleaners not appearing on the National List of Allowed Substances at §205.603 and §205.605 should be outside the scope of OMRI's Review Program." This decision by OMRI means that several sanitizers and disinfectants that were previously "Allowed" and "Allowed with Restrictions" by OMRI will now have a status of "Not Yet Reviewed." If you are certified through PCO, you will receive a special communication from your Certification Specialist if your operation is affected by this change. Manufacturers of inputs are encouraged to apply for a business membership at PCO to submit their inputs like sanitizers and detergents for determining the status of those affected inputs. <https://paorganic.org/membership/>.

Contact us at 814-422-0251 for updates and questions. Your Certification Specialist can add most materials and check a status right over the phone! For more technical questions, feel free to dial Extension 3 or email us at materials@paorganic.org. We sincerely appreciate your business.

Email communication by Doug Currier, Technical Director at OMRI, 13 July 2022.



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Organic Feed, Seed and Community

Marketplace

CROPS

Organic wrapped balage for sale. 2021 wet bails: \$40 each; 2022 wet bails: \$50 each; 2022 dry bales: \$20 each. Please contact James and Donna at 570-746-1651. Bradford County.

Organic Wheat Straw, Dry Alfalfa, Dried Grass and Wrapped Balage. 717-860-3504. Franklin County.

Certified Organic dairy quality balage for sale. 1st \$50.00. 2nd \$60.00. Discount available on large quantities. 570-727-2322. 570-396-3280. Starrucca, Wayne County.

Certified organic hay for sale. Cut May 30th, 2022. Grass legume balage, can deliver. \$70 per bail. Call 315.823.2671. Herkimer 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.



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PCO – A Legacy of Leadership

continued from page 8

The ROC™ program consists of three pillars:

1. Soil Health & Land Management
2. Animal Welfare
3. Farmer & Worker Fairness

ROC also has three levels: Bronze, Silver, and Gold. Each requires a different number and scope of regenerative organic practices to be used. Operations interested in the ROC™ program can request certification of the pillars and levels that meet the level of their businesses as they are today, and they can build from there over time.

The baseline requirement is organic certification, meaning that in order to achieve ROC, an operation must first hold USDA organic certification or an international equivalent formally recognized by the National Organic Program (NOP). The ROC™ program is also based on continuous improvement, so there is the expectation that over time operations are “leveling up” their certification. You can find more information on PCO’s ROC™ webpage, <https://paorganic.org/certification/get-started/regenerative-organic-certified/>, including fee information and how to request an application.

Additionally, ROA’s website, www.regenorganic.org, is a wealth of information, including program standards, applications and other resource documents/forms. You may also contact the PCO office for more information at 814-422-0251.

Organically Speaking

continued from inside front cover

The USDA has been very busy rolling out programs to support operations transitioning to organic and food production practices that are more climate friendly. PCO is pleased to do our part in supporting these programs, and we also share many of your concerns. Again, I encourage you to come together and use our collective voices to bring feedback to USDA so that future investments and subsidies are directed where you feel they will have the most impact. One place you can lend your voice is to provide feedback on the upcoming 2023 Farm Bill.

Equitable access to healthy food and reaching underserved rural and urban communities are high priorities for PCO and NOP, and we look forward to sharing more about how we plan to address these needs over the coming year. PCO is a proud partner in a large Climate Smart Grant awarded to PASA Sustainable Agriculture, and we would also like to congratulate our other organic colleagues who were awarded funding. We must build greater community around and resiliency into our food system, and we’re here to continue to do that work in partnership with you.



Diana Kobus

dkobus@paorganic.org • 814-571-3736

Seeking Cover Images for Organic Matters — Share your Organic Farm/Processing Photos



Do you love capturing images of farm life? Maybe you have a special image that reflects what organic production means to you. We would like to highlight photos from our clients on the cover of our quarterly publication, *Organic Matters*. Our publication is shared with over 1900 individuals who are passionate about organic and its impacts on the health of our environment and communities.

Submission requirements:

- High-resolution photo (JPEG, JPG, HEIC) ideally with 150 dpi (dots per inch)
- Image would need to be good quality in a 8.5" x 11" size
- Send your submissions to our *Organic Matters* Editor, at newsletter@paorganic.org

She's doing her part, we've got to be doing ours.

ALL BREEDS
14 CHAMPIONS

THE CHOICE OF CHAMPIONS

For over a decade at World Dairy Expo!

File photo unrelated to farms quoted in ad.

A recent graduate review of the literature by Cora Okkema and Temple Grandin, published in the Journal of Dairy Science (Vol. 104, Issue 6), suggests udder edema is becoming an "emerging animal welfare issue" in addition to being "quite costly to the dairy operation."

The authors observe it may be present in a high percentage of dairy cows, especially first-calving animals that "exhibit negative behaviors, such as decreased lying time, frequent stepping in the parlor and udders and teats that are sensitive to the touch. Udder edema can have detrimental effects on the structural integrity of the udder and teats, which then increases risk of mastitis," the authors write, noting that "udder edema is associated with udder cleft dermatitis (udder scald) and increased risk of mastitis."

This is one reason why Emily Pankratz relies on Udder Comfort™ for the 150-cow Organic dairy herd she manages at Holtz Ridge Grass Farm, Rudolph, Wisconsin, where she has enjoyed caring for the cows from calving through dryoff.

"We keep using Udder Comfort because it takes edema out of the udders more quickly than anything else," Emily reports.

"Our protocol is to spray udders with the Udder Comfort yellow spray after every milking (post-calving) until the cow or heifer is no longer high on CMT test. This includes all fresh cows plus any cow that may acquire mastitis or high SCC at any point in lactation," she explains.

"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 confirms.

Jonathan Miedema of Dutchlane Dairy agrees. He is the third-generation operating the 130-cow Organic dairy farm near Sherburne, New York. "Being an organic dairy, it's good to have this natural product for preventive use in fresh cows. Udder Comfort provides relief from swelling. It's part of our management for high quality milk," he relates.



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For external application to the udder only, after milking, as an essential component of udder management. Wash and dry teats thoroughly before milking.

Event Calendar

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

All times listed are Eastern Time Zone unless otherwise indicated.

OCTOBER

OCTOBER 23

PASA Community Potluck: Eastern Pennsylvania

4:00–7:00PM

PASA Philly Hub Office, 2648 Coral St.
Philadelphia, PA

OCTOBER 24

PASA

Boosting Productivity on an Urban Orchard

10:00AM–1:00PM

Weaver's Way Farms – Henry Got Crops,
7095 Henry Ave., Philadelphia, PA

OCTOBER 26

PASA

Webinar: Building Equity for U.S. Farmers: A Talk with Agriculture Secretary Redding

1:00–2:00PM, Free

pasafarming.org/events/category/pasa-event

OCTOBER 31

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

NOVEMBER

NOVEMBER 2

Rodale Institute

Webinar: Holistic Considerations of Water Utilization in Organic and Regenerative Farming Systems

2:00–3:00PM, Free

rodaleinstitute.org/education/webinars

NOVEMBER 5–7

Caroline Farm Stewardship Association

2021 Sustainable Agriculture Conference

Durham, NC

carolinafarmstewards.org

NOVEMBER 7

PASA: Alley Cropping Field Day Revitalizing a Hay Field to Grow Health & Heritage

Many Streams Farm, Stewartstown, PA
pasafarming.org/events/category/pasa-event

NOVEMBER 9

Rodale Institute

Webinar: Cutting Through Greenwashing – Regenerative Organic Certification (ROC)

2:00–3:00PM, Free

rodaleinstitute.org/education/webinars

NOVEMBER 10–11

Organic Farming Conference

Mt. Hope Event Center

Mt. Hope, OH

www.organicfarmingconf.com

NOVEMBER 16

Rodale Institute

Webinar: How Can Cover Crops Improve Soil Health

2:00–3:00PM, Free

rodaleinstitute.org/education/webinars

NOVEMBER 23

Rodale Institute

Webinar: How Do Farming Practices Impact Soil Health & Water Quality?

Research Update of the Watershed

Impact Trial (WIT)

2:00–3:00PM, Free

rodaleinstitute.org/education/webinars

NOVEMBER 24/25

Thanksgiving Holiday

PCO Office Closed

DECEMBER

DECEMBER 3

Rodale Institute

Winter Open House

12:00–4:00PM, Free

DECEMBER 5–8

ACRES USA

2022 Eco-Ag Conference & Trade Show

Covington, KY

www.acresusa.com/events/

DECEMBER 6

PASA

Advanced Grower Intensive

8:45AM–4:15PM

Nurture Nature Center,

518 Northampton St., Easton, PA

pasafarming.org/events/category/pasa-event

DECEMBER 7

Rodale Institute

Webinar: Updates on the Vegetable Systems Trial Soil Health & Vegetable

Nutrient Quality

2:00–3:00PM Free

rodaleinstitute.org/education/webinars

DECEMBER 24–JANUARY 1

Christmas–New Year's Holiday

PCO Office Closed

Save the Date!

PASA 2023 Sustainable Ag Conference

January 17–19: Virtual

February 8–11: In-Person

<https://pasafarming.org/conference/>

Save the Date!

NOFA VT Winter Conference: Back to the Roots

February 18, 2023

www.nofavt.org/events/annual-nofa-vt-events/winter-conference

STAY CONNECTED,
VISIT:
paorganic.org

Celebrating PCO's 25th Anniversary with PCO Founding Farmers – Part II

Rodale Institute

Rodale Institute and the land we farm has always been, and always will be, organic. But, in the early years of farming organically there wasn't even a certification process, let alone a USDA accredited program. As the need for a certification process began to materialize, Rodale Institute was at the forefront of the conversations and inspiration for many of the early individuals and organizations beginning to form.

By the early 1990's, along with many other farmers and organically minded people, Rodale Institute saw the need to have a Pennsylvania based organization to certify our farms – an organization that included education along with certification to grow and support the organic industry at the farm and processor level. From the first foundational meeting held at the Institute and today, Rodale has enjoyed a strong relationship with PCO.

Now more than ever we need a strong PCO with integrity and passion for the work ahead and the future, building on a strong history.

—Jeff Moyer, CEO Rodale Institute



Phillips Mushroom Farm

The Phillips family has been growing mushrooms in Kennett Square, PA since 1927, and made the decision to become certified organic in 1996. Phillips Mushroom Farms really is a family business, whether you're related or not. I joined Phillips in 1995 and found that care of family, employees, and community dictated that the practices in place already were so close to organic that it made good sense for us to make it official. That coincided with the foundation of PCO and we have been happy with both decisions since then; both becoming certified organic and choosing PCO. A former Phillips employee, Pam Coleman, served on the founding board of directors and wrote PCO's revised/expanded organic mushroom standards in 1998–1999. I went on to serve several terms on the Board. The experience and the extraordinary people I met while serving were life changing and I am so grateful for the opportunity to be involved with a mission driven organization like PCO with values that track so closely with PMF and me personally.

— Tina Ellor, Technical Director, Phillips Mushroom Farm

Village Acres Farm

The legacy of Village Acres Farm is founder Roy Brubaker's commitment to connecting people to their food, the earth and each other. That 'each other' piece was a big part of our farm's involvement in the founding years of PCO. An organic community where farmers could focus on the integrity of the label and a commitment to principles of soil health and holistic systems is what still connects us today.

— Hannah Smith-Brubaker,
Village Acres Farm & Foodshed, PASA Executive Director

Pictured from left:
Hannah, Deb, and the late Roy Brubaker.



Look for more memories in future
issues of *Organic Matters*.



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Conversion Recommendations from HNI: Explorer 10-0-0

Excellent Conditions:

High Organic N (with Manure)

2 Quarts = 60 lbs. Nitrogen

Low Organic N (without Manure)

2 Quarts = 30 lbs. Nitrogen

Challenging Conditions:

High Organic N (with Manure)

3 Quarts = 60 lbs. Nitrogen

Low Organic N (without Manure)

3 Quarts = 30 lbs. Nitrogen

ANIMAL BASED NITROGEN VS. EXPLORER™ LIQUID 10-0-0	Animal- Based Nitrogen	Explorer™ Liquid 10-0-0
Nitrogen Availability	Slow Release, requires bio-decomposition	100% - Immediately
Solubility	Not fully soluble	100%
Application Restrictions	Foliar Applications not recommended	None
Ease of Use	Smell, mixing procedure	None
Origin	Chicken/Fish/Manure	Non- GMO, soy protein hydrolysate
Effect of temperature on availability	Slower or no release in colder temperatures	None
Amino Acid Profile	Inconsistent to None	98.6%/60.9% Iq Amino Profile
Stability	Adulterated for insuring some stability	Complete and lifetime




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