

Organic Matters

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Organically Speaking



The bounty of summer is upon us, and along with an abundance of work, the staff at PCO is also enjoying plenty of food, fresh from our gardens and local farms. Three years ago on June 15, I began my work with PCO, and in that time we have come a long way in updating our workflows, our operations, and our relationships with you. There is always more work to do to accommodate new changes, to communicate more effectively, and to take every opportunity to develop and offer programs that serve you better. Our staff cares deeply about your success and importance of your work to all of us, and I look forward to what the next three years will bring!

With the inspection season in full swing, the inspections team has been communicating consistently to ensure this process goes as smoothly and cost-effectively as possible for our clients. As always, if you have any concerns or questions, please reach out as proactively as possible, so that if we need to make changes to the inspections schedule, we have as much lead time as possible to accommodate them.

Our entire certification staff has been involved in preparing for the Strengthening Organic Enforcement rule implementation and the changes it will bring to all of us, so please be sure to check out our dedicated web page for SOE updates and be sure to connect with your certification specialist as soon as possible if you have questions. If your operation is connected with any part of the supply chain that needs new certification, please reach out as soon as possible, so that we may get the application process started and the operation scheduled to be inspected by the March 2024 deadline. More information about who needs to be certified can be found at the USDA website. We will have a series of webinars and in-person town halls coming up in August, September and October as well to keep you updated as the certification community continues to work through what these changes mean in practice.

With updates to the USDA's Organic Certification Cost Share program, please make sure you are taking advantage of this important benefit for saving on certification costs!

It's a Farm Bill year, and this spring was very full of events and meetings that gave PCO the opportunity to participate and connect with government and agency representatives to share your stories and struggles, so that your voices are heard and reflected in the development and updating of programs and services.

The spring meeting of the National Organic Standards Board (NOSB) convened in Atlanta in April, and I joined PCO's Policy Advisor, Kyla Smith, who currently holds the USDA Accredited Certifying Agent seat on NOSB. A highlight of this meeting was a panel of organic farming leaders representing



Left to right: Katherine D. Matteo, Diana Kobus, and Andrew Martino (Global Organics LLC) during Capital Hill visits in Washington D.C.

the Southeast US and also participating in the Transition to Organic Partnership Program (TOPP). With the fall meeting coming up in Providence, Rhode Island, PCO as the Northeast/Mid-Atlantic TOPP Lead will be helping to coordinate a similar representation of this work in the Northeast.

Along with many colleagues, PCO participated in OTA's Organic Week, including Hill visits to PA Senator John Fetterman, Chair of the Senate Subcommittee on Food and Nutrition, Specialty Crops, Organics, and Research, and PA Representative G.T. Thompson, Chair of the House Committee on Agriculture. PCO had strong representation on the Organic Confluences panel for 'Organic Regulations and Plastics: Policies, Pathways, and Challenges', with three of four panel members having ties to PCO: PCO Board Member Katherine DiMatteo, PCO Policy Advisor Kyla Smith, and Chris Anderson, VP at Sustainable Strategies.

Directly following Organic Week, PCO also helped coordinate an event to promote the USDA's new Organic Market Development Grant program, one of three pillars of the USDA's broader Organic Transition Initiative. Hosted at Chatham University's Eden Hall Farm campus (just outside of Pittsburgh and certified by PCO), USDA Undersecretary for Marketing and Regulatory Programs, Jenny Lester Moffitt, talked about this newly announced program. I was honored to join her in giving remarks at Rachel Carson's alma mater (Class of 1929, then named the Pennsylvania College for Women), alongside other esteemed guests including PA Secretary of Agriculture Russell Redding, Lou Leonard, Dean of Chatham's Falk School of Sustainability & Environment, and local PCO Certified farmer T.

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PCO's VISION

A world where agriculture systems prioritize health, ecological balance, fairness and care.

PCO's MISSION

To uphold and advance organic principles and practices through certification, advocacy, and technical support.

PCO's 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

Summer 2023



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COVER PHOTO: © Shutterstock

Policy Updates

Organic-Friendly Farm Bill Marker Bills and Important Updates on Financial Assistance for Your Farm

Photo: ©Shutterstock.

The Farm Bill is a package of legislation made up of many chapters, each with numerous sections and policy ideas. The Farm bill sets U.S. federal agriculture policy and is reauthorized by Congress through the House and Senate Agriculture Committees roughly every five years. It includes titles covering nutrition, commodities, conservation, trade, rural development, research, forestry, energy, horticulture and organic agriculture, livestock, crop insurance, and more.

WHAT IS A MAKER BILL?

Marker bills are smaller bills that are not meant to pass on their own but are introduced to promote and build support for a policy idea in the hopes that idea will be included in a major omnibus package like the Farm Bill. Marker bills help build grassroots and congressional support for policies. If included in the final text of the Farm Bill, the following marker bills will improve programs that are crucial to organic farmers.

OPPORTUNITIES IN ORGANIC ACT (S. 1582 & H. 3650)

The Opportunities in Organic Act will build on USDA's Organic Certification Cost Share Program and Organic Transition Initiative to remove barriers to organic production in several important ways:

- Allow cost-share payments that cover 100% of certification costs, up to \$1500 per scope (Crops, Livestock, Wild Crops, Processing).
- Provide flexible funding for organizations to support organic transition, particularly for smaller scale producers, producers of color, and underserved regions; these organizations may provide a wide range of services, including culturally and regionally relevant assistance with the certification process and recordkeeping, inspector training, and mentorship programs.
- Flexible funding for organic operations to offset costs and reduce barriers associated with the transition process, ranging from learning new farming and ranching

techniques to business planning, equipment, and processing infrastructure

- Improve technical assistance available through public agencies, universities, and NGOs by providing resources for organic-relevant technical expertise, capacity, and partnerships at public institutions and organizations, including support for education, outreach, and market expansion, so producers in any part of the country will have access to professional assistance that will help them build healthy soil, manage pests naturally, and protect natural resources.

STRENGTHENING ORGANIC AGRICULTURE RESEARCH ACT (H. 2720)

Investing in organic research has significant benefits for all farmers, as well as for rural communities and ecosystems. The Strengthening Organic Agriculture Research Act, or SOAR Act, will provide additional funding for several important organic research programs.

- Increase funding for the Organic Research and Extension Initiative (OREI). The SOAR Act would provide stair-stepped budget increases to OREI, from \$60 million in 2024 to \$100 million in 2028.
- Provides Congressional authorization and direction for the Researching the Transition to Organic Program, currently known as the Organic Transition Research Program (ORG), with an authorization for appropriations of \$10 million a year from 2024-2026 and \$20 million from 2027-2028.
- Increase funding for the Organic Production and Market Data Initiative (ODI) providing \$10 million over the life of the Farm Bill, doubling the farm bill funding for this important USDA initiative. The data produced through the ODI aids in the development of risk management products and targeted market development.
- Directs ERS to conduct a full, systematic evaluation of the

economic impact organic agriculture has on rural and urban communities, taking into account economic, ecological, and social factors.

As Congress continues work on the 2023 Farm Bill amidst the annual appropriations process, USDA has announced a number of new programs and funding opportunities.

WHAT ARE APPROPRIATIONS?

Congress uses an authorization-appropriation process that provides for two separate types of legislation – authorization bills and appropriation bills – that are generally considered in sequence. First, authorization bills establish, continue, or modify policies, agencies, and programs. Second, appropriations bills provide spending for the agencies and programs previously authorized.

RESTORATION OF COST SHARE FUNDING FOR 2023

The Farm Service Agency has increased the cost share amount under the Organic Certification Cost Share Program (OCCSP). FSA will cover up to 75% of costs associated with organic certification, up to \$750 for crops, wild crops, livestock, processing/handling and State organic program fees. OCCSP will cover costs incurred from Oct. 1, 2022, through Sept. 30, 2023. This brings the amount of funding back up to the maximum allowed by the 2018 farm bill, after a 2020 reduction to 50 percent of the certified organic operation's eligible expenses, and a maximum of \$500 per scope.

This is a reminder to keep your PCO invoices and other receipts that fall into these reimbursable categories. Currently local FSA offices are accepting applications. **Applications are due by October 31, 2023.** FSA is also accepting applications from state departments of agriculture to administer OCCSP.

NRCS ANNOUNCED \$75 MILLION TO ASSIST PRODUCERS TRANSITIONING TO ORGANIC

This spring, NRCS announced that they would invest \$75 million in conservation assistance for producers transitioning to organic as part of the Organic Transition Initiative (OTI). The majority of the funding will be used to provide direct assistance to farmers adopting the new EQIP organic management standard, which provides support for organic conservation practices to protect water quality and improve soil health. Practices receiving special emphasis this year include:

- Increasing the use of cover crops
- Implementing no till and/or reduced till methods
- Installing field borders and wildflower planting
- Establishing trees and shrubs

In order to be eligible, certified organic farmers must submit a copy of their current organics system plan (OSP) and maintain their organic certification for their entire EQIP contract. Transitioning organic farmers need to:

- Begin or be in process of transitioning to a certified organic operation

- Submit a self-certification agreeing to develop and implement an organic system plan
- Work with a certifying agency
- Proof you control the land you wish to certify (i.e. lease agreements as applicable)

HOW TO APPLY:

Program sign-up is continuous with periodic evaluation and pre approvals throughout the year. To apply,

- 1) Visit your local Farm Service Agency (FSA) to ensure that you qualify and
- 2) If eligible, visit with your local NRCS office to develop a conservation plan which is the basis of the EQIP contract.

For more information, view the OTI Factsheet.

ORGANIC DAIRY MARKETING ASSISTANCE PROGRAM LAUNCHES

On May 18th, the USDA announced the launch of the Organic Dairy Marketing Assistance Program (ODMAP) to assist organic dairy farmers through this period of economic hardship. ODMAP is established to help mitigate market volatility, higher input and transportation costs, and unstable feed supply and prices that have created unique hardships in the organic dairy industry. Specifically, under the ODMAP, USDA's Farm Service Agency (FSA) is making \$104 million available to organic dairy operations to assist with projected marketing costs in 2023, calculated using their marketing costs in 2022. ODMAP provides a one-time cost-share payment based on marketing costs on pounds of organic milk marketed in the 2022 calendar year.

Adam Warthesen, co-chair of the Organic Trade Association's Organic Feedstuffs Relief Task Force, and Senior Director of Government and Industry Affairs for Organic Valley said, "With unprecedented organic feed costs and inflationary pressures over the last couple of years, resources like ODMAP are really going to matter as farmers plan for the rest of this year (USDA, 2023.)"

Chris Adamo, Vice President of Public Affairs and Regenerative Agriculture Policy with Danone North America, said, "Recent increases to cost of feed and overall inputs have significantly impacted organic dairy farms, and on behalf of Horizon Organic, we are grateful for USDA's thoughtful work and strong support for the farms that supply our customers' milk (USDA, 2023.)"

How to apply? Visit your local Farm Service Agency (FSA) to complete the ODMAP application. Producers must:

- 1) certify to pounds of 2022 milk production
- 2) show documentation of their organic certification, and submit a completed application form.

Quotes above sourced from USDA. "USDA Offers Assistance to Help Organic Dairy Producers Cover Increased Costs." *USDA Press Release*, 19 May 2023. www.fsa.usda.gov/newsroom/news-releases/2023/usda-offers-assistance-to-help-organic-dairy-producers-cover-increased-costs. Accessed 3 July 2023.

PCO's New Certification Policy Advisor Role

Importance of the Public-Private Partnership of the NOP

KYLA SMITH, CERTIFICATION POLICY ADVISOR

We are all familiar with the organic regulations as organic industry stakeholders from farmers to processors to inspectors to certifier staff to consumers of organic products. Some of us are more familiar than others or focus on certain parts of the regulations depending on the work we do everyday. I've been fortunate to be engaged in the organic industry for over 20 years and have held several different roles at PCO in that time. Most recently, I took on a new role as the Certification Policy Advisor. In this role, I am responsible for performing certification policy analysis and development, compliance, and program training. This is the perfect fit for me as I love to talk about the organic regulations to discuss how the regulations can apply to different types of organic operations depending on their production practices, location, and scale. There are many other factors that make organic operations unique, yet all need to comply with the same set of requirements.

Most PCO certified operators are more familiar with the production practice parts of the regulations as they apply to your operation and don't necessarily need to think about regulations in broad terms or how they might apply to a different type of organic operation. The regulations were written intentionally in a broad way so that they could be applied across the globe and by any size operation. Sometimes you might hear the terms "scale neutral" and "site specificity" being applied to the organic regulations to capture these concepts. On one hand this is helpful because it allows for so many different types of operations to comply with the organic regulations and gain access to the benefits of organic production and premiums. On the other hand, because the regulations are vague, there are opportunities for inconsistent implementation or operations to find loopholes and take advantage of a thriving industry.

When these inconsistencies and/or loopholes are uncovered, there can be many paths forward to ensure consistent implementation or to close these loopholes. PCO can and does



Left to right: NOSB Members Nate Powell Palm (Producer Member), Kyla Smith (USDA Accredited Certifying Agent Member), Mindee Jeffery (Retailer Member), Dr. Jennifer Tucker (Deputy Administrator USDA National Organic Program), Amy Bruch (Producer Member) pictured at the 2023 NOSB Meeting in Atlanta, GA.

review and revise internal policies to align with other certifiers or as the result of training or noncompliances issued by the National Organic Program (NOP). The National Organic Standards Board (NOSB), which is an advisory committee to the NOP, often makes recommendations to the NOP for guidance or rulemaking to further clarify areas of misalignment or gaps. An example of this that is in front of all of us right now is the Strengthening Organic Enforcement (SOE) rulemaking.

This is an excellent opportunity for stakeholders to engage early in the process on matters that impact your operation.

We also recently experienced a rule change related to Origin of Livestock. And on the radar is Organic Livestock and Poultry Standards (OLPS). OLPS is in the rulemaking process, between the proposed and final rule stage. We can anticipate this final rule to be published shortly.

Most of these rule changes started out with the NOSB. As stated prior, the NOSB serves in an advisory role to the NOP, holding public meetings twice a year – spring and fall. I am currently serving on the NOSB as the certifier representative. This is an excellent opportunity for stakeholders to engage early in the process on matters that impact your operation.

The organic industry is quite unique in many ways. First, as this is a voluntary program, operations that choose to

participate are fully aware of the increased regulatory requirements they are signing up for and they welcome a strict and robust regulatory framework to ensure integrity of the seal so that bad actors aren't able to take advantage of the premiums without actually adhering to the organic production and recordkeeping requirements. Organic operations are some of the few that say "regulate us more." Second, the organic industry is built on a public-private partnership. This means that the private sector (e.g. organic operations, certifiers) has the opportunity to provide feedback to the public sector (e.g. NOP, NOSB) on proposed changes to the organic regulations at various stages in the rulemaking process. The NOSB and NOP rely on stakeholder feedback to ensure the organic regulations are both sound and sensible. In other words, they need to ensure organic integrity throughout the entire production and supply chain while being practical to be implemented by organic producers.

PCO encourages you to pay attention to announcements regarding NOSB meetings and NOP rulemaking. These may come from PCO via individual email/letter, monthly eNews (electronic) or quarterly *Organic Matters* newsletter. The NOP also sends announcements via the Organic Insider. You can sign up at for the Organic Insider here. Also, please don't hesitate to call or email (814-422-0251 x216; kyla@paorganic.org) to discuss upcoming NOSB agendas or items in the regulatory pipeline. As I previously mentioned, it's one of the things I enjoy most! Take full advantage of submitting comments to the NOSB and/or NOP so that your unique perspective can be incorporated into final rulemaking efforts. Once a final rule is published, organic operations must adhere to the requirements as written and implement them accordingly on their operation.

Please see the Standards and Policy update for a recap from the Spring 2023 NOSB Meeting.

SAVE THE DATE!

Fall 2023 Meeting being held in Providence, Rhode Island from October 24-26, 2023. Public comment webinars will be held on October 17 and 19, 2023. The agenda isn't finalized, however, topics are likely to include:

- **2025 Sunsets** – voting
- **Proposals on Oversight Improvements to Deter Fraud** – voting
- **Discussion document on Climate Induced Farming Risk and Crop Insurance** – discussing only
- **Discussion document on Residue Testing for Global Supply Chain** – discussing only
- **Discussion document on Support for Transitioning Producers** – discussing only
- **Discussion document on What and Why Organic?** – discussing only
- **Petitioned substance:**
 - Crops list: Potassium sorbate and Carbon dioxide – voting
 - Handling list: Magnesium carbonate and Magnesium carbonate hydroxide – discussion

For more information, visit the NOSB Fall Meeting webpage.

New Faces



LEILANI DURAND
TOPP Program Director

Leilani joined the PCO team as the TOPP Program Director in June, 2023. Leilani grew up on an organic farm in southwestern Wisconsin and has over 18 years' experience in biological and organic farming. She is the former Vice President of Research and Development at Midwestern BioAg where she developed and tested new fertilizers, conducted consultant and farmer trainings on biological farming practices, and consulted on soil health and fertility on organic and transitioning farms. Leilani has authored numerous articles and co-wrote a biological farming book together with her father, Gary Zimmer. Leilani has a master's degree in Plant Ecophysiology from the University of Hawaii at Manoa, and started her career as a natural resources manager in Hawaii. In her spare time, she enjoys cycling in the beautiful Wisconsin hills, hiking with her family, and watching her children perform music.



HEIDI HUMLICEK
Certification Specialist

Heidi is originally from the Twin Cities area of Minnesota where she attended the University of Minnesota graduating with a degree in conservation biology. Since graduating, she has worked over 10 years for state and federal departments of agriculture protecting agriculture from invasive species. Heidi has also worked as a contract organic crop inspector covering the southeast. In her spare time, you can find her spending time with her son, hiking, swimming, and gardening.



McLANE NAGY
Certification Specialist

McLane joined the PCO team as a Certification Specialist in July 2023. She is from southern Ohio where she grew up on the small family farm. Prior to working for PCO McLane was a Certification Specialist at the Ohio Ecological Food and Farm Association and managed a CSA vegetable farm in Galena, Ohio for four years. McLane is often working in her own garden or in her art studio where she focuses on fiber arts.

Training the Next Generation of Dairy Graziers

Master grazier and apprentice learn from each other in formal apprenticeship

This article has been re-printed from the 2018 Summer Issue of Organic Matters. It features a Q&A between a master grazier and apprentice pair – Gay Rodgers and Jess Matthews from Hameau Farm in Belleville, PA – who participated in PASA’s Dairy Grazing Apprenticeship (DGA). Modeled after apprenticeships in the skilled trades, DGA balances paid, on-the-job training with related coursework and technical instruction. DGA is a first-of-its-kind, formally accredited apprenticeship program founded by dairy farmers in Wisconsin. It’s now operating in several states across the country. PASA administers the program in Pennsylvania and surrounding areas.

If you’re interested in joining the Dairy Grazing Apprenticeship program by applying to become either a master grazier or apprentice, please contact Lucas Waybright by email at lucas@pasafarming.org or phone at 814.349.9856 x726.



Master grazier Gay Rodgers (left) and apprentice Jess Matthews (right) at Hameau Farm.

Q&A with Gay Rodgers Master Grazier, Hameau Farm

Gay served on the board of PASA and PCO and has hosted an organic dairy inspectors training at Hameau Farm. She looks forward to pursuing organic certification of the farmland, which has not been sprayed with agrichemicals for 30 years.

Why did you choose to become a master grazier?

I like sharing what I do, and if there are young people interested in this work, I want to share it with them. At first, I wasn’t sure I was a “master,” but once I realized that this was going to be a learning situation for everyone involved, I relaxed with it.

I feel like we graziers need to talk about what we do. It’s almost like our way of dairy farming has been a secret for some time, but it’s important to share it, especially now.

How has the program supported your personal goals and/or your farm?

My philosophy has always been to share your passion and what you do so that others can catch that spirit and learn from it. From the summer camp we’ve run on this farm for many

years, now to Dairy Grazing Apprenticeship, Hameau has always been a place where mentorship is an important practice.

What have you found challenging?

The biggest challenge has probably been finding the time to teach and explain as much as I would like. The learning curve for a beginner is long. That isn’t necessarily a negative – it’s to be expected, and working with beginners also comes with some positives – but finding adequate time is always a challenge.

What have you especially enjoyed?

I’ve enjoyed the interactions with Jess, especially when she gets an idea and runs with it. She has a beginner’s mind, and often sees possibilities in things I’ve overlooked. For instance, I’ve had bags of wool from our sheep sitting around for ages. Jess asked if she could play with some of them, and wound up making all sorts of crafts, from felted animals to dryer balls, that she’s actually been able to sell. There’s a creativity there that has been a lot of fun to learn from and interact with.

What has surprised you about the experience?

That there are young people out there that are interested in learning this way of farming, and farming, generally. It’s easy to get bogged down and depressed, thinking that no one wants to continue to do this, but there are people out there who are interested. The way they want to farm, though, might look

different than the last generation. I think a lot of the next generation is especially interested in farming closer to nature, with cows out on grass.

What advice would you give to someone considering becoming a master grazer?

Just do it, but be prepared to learn something yourself. The education here isn't a one way street, and it's important to have an open mind.

Q & A with Jess Matthews
Apprentice, Hameau Farm

Why did you choose to become an apprentice?

I have always been interested in farming and food sovereignty, and came across this opportunity on the PASA website. I love animals and working outside, so this seemed like it would be something I would really love. Gay was fantastic in letting me have an opportunity to try this out.

How is the program supporting your personal goals?

I get to do what I absolutely love, and the program gives me a much needed structure, pay, and timeline.

What have you found challenging?

I knew there would be physical challenges; I didn't realize there would be emotional ones. I absolutely love these cows and the other animals on the farm. When they are sick or hurt, I am sad and scared for them. I know so much about them—it's hard to detach emotionally.

What have you especially enjoyed?

I don't know that I can narrow it down. Getting to know the cows; [getting to know] Gay; seeing the campers learn and grow; working with wool and milk to make cheese and butter; watching the seasons change; the amazing scenery; that one peaceful moment once all the cows are in the barn and we're about to start milking; watching calves grow; assisting with births; collecting eggs; petting calves; even scraping the barn. The whole experience is just so satisfying.

What has surprised you about the experience?

I am stronger than I thought I was! I will struggle with something (be it hiking up a huge hill, hauling heavy buckets of water, chasing small heifers that got out), and day by day I will get better at it! I am surprised by just how much I love the cows, sheep, and chickens. My friends who luckily love me dearly now have to hear stories about Hava, Hope, barn kittens, and bottle feeding calves. They know the cows names too and ask how they're doing.

How do you plan to utilize your experience after you complete the program?

I'm just not sure yet. I am a homesteader at heart and like the idea of having animals on a homestead, but I don't know. I love Hameau Farm and Gay and the cows. I don't see myself anywhere else.

PASA is a Pennsylvania-based sustainable agriculture association working to build a more economically-just, environmentally-regenerative, and community-focused food system through education and research that directly supports farmers. Learn more at pasafarming.org or call (814) 349-9856.



Gay Rodgers is a third-generation breeder of Ayrshire cows, known for their hardiness and ability to convert grass into milk efficiently.

Planning & Refining Rotational Grazing Systems



Photo: Emily Decker

This article has been re-printed from the 2019 Summer Issue of Organic Matters.

BY AARON DELONG, PASA

Hameau Farm, a grazing dairy in Belleville, Pa., has a long tradition of working with beginners in agriculture. Owner Gay Rodgers (below) has operated a girls' summer camp for over two decades, and a few years ago Hameau became a host farm for Dairy Grazing Apprenticeship (DGA), a federally accredited apprenticeship program dedicated to training new farmers in the art, science, and business of grass-based dairy. While Hameau's summer camp has exposed a great number of young girls to farming that might have never experienced it otherwise, serving as a host farm for DGA apprentices has empowered Hameau to train adults who are ready to take the leap into farming as vocation.

On May 2nd, Gay and her apprentice Jessica Matthews (right) welcomed a diverse group of nearly fifty attendees – including beginning to experienced farmers, cheese makers, technical service providers, and students studying agriculture – to the farm to learn about Hameau's rotational grazing system for their dairy herd, and how to design effective rotational grazing systems of their own.

Gay began the day by leading the group up a hill to a paddock beside the one in which the milking herd was grazing, and from which we could gaze down on the bulk of the farm and its permanently fenced paddocks. There, she discussed the components of her rotational grazing system, and grazing systems in general: cows, milk, soil, and grass. The logic behind



adapting a rotational grazing system arose from these four interconnected factors on the farm.

COWS

Begin with the cows. Hameau Farm is home to an all Ayrshire herd. Typically a bit smaller than many other breeds, with a wider body and shorter legs, the breed is built to graze. In their native Scotland, Ayrshires were known for their excellent components and being adept at making use of marginal pasture.

It's no different at Hameau, where the herd subsists primarily on their dry matter intake from pasture during the grazing season, which extends from April to November. When they are milked, the herd also receives dry hay and a grain supplement – typically about one pound per five pounds of production. During the winter, the herd is fed a mix of dry hay, grain, and baleage.

Gay's family has ancestral roots in Scotland, and the adoption and promotion of the Ayrshire breed by her clan goes back to her father, John, who has been active in Pennsylvania dairy for many decades.

MILK

From the cows comes the milk. Hameau is proud of the quality of the milk their cows produce, and in March 2019 the farm received a raw milk permit to sell some of their product on-farm directly to consumers. This effort to direct market some of the farm's milk was spearheaded by Gay's apprentice Jessica. New to dairy two years ago, Jessica has become an integral part of the Hameau operation – from milking to feeding, to developing new market opportunities.

At Hameau, the average production per day per milking cow is near 50 pounds. Gay's goal for butterfat level in the milk is 4 percent, which, she noted, is easier to accomplish during the spring flush.

SOIL & GRASS

A grazing dairy herd depends on quality forage, which in turn depends on farmers managing grazing skillfully. Over time, Gay has been able to develop pastures with over 7 percent organic matter and a diversity of forage species, primarily through management intensive rotational grazing practices.

Cows are given new breaks of grass twice a day after each milking, and a typical rotation around the farm is 30 days, depending on the weather. Gay rarely seeds her pastures, and demurred on the idea of “weeds.” Even thistles can be grazed, she said, particularly when in flower – though some of the attendees wondered if this view was in part linked to a general Scottish affinity for the thistle!

HAMEAU’S GRAZING SYSTEM

The basic structure of Hameau’s grazing plan consists of 26 paddocks, laid out side by side. Their system is simple and replicable: Moveable polywire separates each acre of pasture, which is plenty to support their stocking density of approximately 35 cows (a mix of cows in milk and dry cows).

All of the paddocks open toward the barn, so in the afternoon when it’s time to milk Gay and Jessica can simply open the polywire “gate,” let the cows march into the barn area to milk, then open the next paddock down the line. The cows are used to the routine – when they hear the sanitize cycle in the milk house kick on they are often waiting at the polywire gate to come in. Conversely, when milking is done, they can hardly wait to leave the barn and get a fresh break of grass.

The big puzzle in the grazing system at Hameau has become how to keep the herd watered when they are out on pasture. A

laborious system of hoses is in the process of being replaced by a solar-powered well pump atop the hill. The pump fills a reservoir, which then gravity feeds down to hydrants installed in every other paddock. From the hydrant, they fill a water tub which can serve two paddocks; a job float prevents overflow.

The system – when it works – is “fantastic,” Jessica commented, “but there have been hiccups.” For instance, airlocks have occurred at dips in the topography of the paddocks, a cow bent one of the hydrants, and, in one instance, a snake seemed to have blocked the water flow. The project is ongoing, with the National Resources Conservation Service continuing to help Hameau iron out the issues on what promises to be an excellent asset in their grazing system.

GRAZING SYSTEM DESIGN

After the morning session in the pasture, and a delicious lunch by chefs Lindsay Sollers and Lisa Sunderland, the group spent the afternoon indoors, listening to a presentation from grazing specialists Titus Martin and Suzette Truax from NRCS (the agency was instrumental in helping create Hameau’s grazing plan over 20 years ago).

Titus and Suzette focused on grazing system design. They used the grazing system of another local dairy and Dairy Grazing Apprenticeship host farm, Bear Meadows in Boalsburg Pa., as a case study in using existing infrastructure to increase grazing management intensity. Bear Meadows apprentice Amber Donaldson was present to discuss and ask questions of the two long-time grazing specialists about how Bear Meadows might optimize their pasture resources in order to create an even stronger operation.

continued on page 13



Field day attendees discussing Hameau's rotational grazing system at the farm in Belleville, PA. Photo: Emily Decker

Organic Inspectors: Their role in the certification process

CORINNE WESH, PCO INSPECTION PROGRAM
MANAGER

PCO's inspectors play an important role in the certification cycle and create a crucial bridge between PCO-certified operations and staff in the office. Knowing what you can - and can't - expect of inspectors during your annual inspection will help you understand the inspection process and how to seek assistance with your certification needs.

All PCO inspectors are highly-trained, qualified individuals who work hard to juggle the logistical needs of the operations they inspect while also staying current with changing regulations and policies. Most PCO inspectors visit many dozens of certified operations each year, putting in long hours on the road and long hours in front of the computer.

The actual work inspectors conduct during an inspection is very specific and defined by the NOP regulations. All inspectors are bound by strict confidentiality rules and also must adhere to PCO policies and procedures.

Every year, you can expect your inspector to complete the following during the annual inspection process:

- Contact you directly to schedule your inspection.
- Describe a plan for the day of the inspection.
- Answer questions about how the regulations apply to your operation.
- Verify the compliance of your operation with the USDA-NOP regulations.
- Ask you questions to verify your submitted Organic System Plan (OSP) and understand how your operation's unique practices, location, and procedures meet the NOP regulations.
- Update your OSP during the inspection with your most current information.
- Identify and discuss the parts of your operation that may not meet the regulations.
- Write a report based on inspection verification steps and observations. Your Certification Specialist will then use this report to make certification decisions.

The inspector **must not** do the following, based on the regulations:

- Offer advice about how your operation can meet the NOP regulatory requirements.

- Share information about your operation with other certified operations. Inspectors must keep information confidential.
- Make any final determinations about the status of your organic certification. Only PCO Certification Specialists can make final certification decisions.

PCO inspectors are committed to ensuring positive inspection experiences while also upholding organic integrity.

If you have feedback you'd like to share with the PCO Inspections Team about your recent inspection, please submit your thoughts by phone or email.

This form can also be sent to you by postal mail. Call 814-422-0251 to request a copy of the form.

Do I need to be inspected if I'm planning to surrender my certification?

If you find that you no longer wish to maintain organic certification for your operation at any time during the 2023 annual cycle, communicate directly with your PCO Certification Specialist about your specific plan for surrendering your organic certification.

To surrender, certified operations must submit a Surrender Form to formally indicate they wish to surrender certification and this form must include a specific date of surrender.

If a form is not submitted, Annual inspection scheduling will continue as usual until a Surrender Form is submitted to PCO.

Certified operations must supply a specific date of surrender with the completed Surrender Form. Once an operation surrenders, it is no longer able to sell organic products or represent the business as certified organic.

Please keep in mind that if you are not able to provide PCO with a completed Surrender Form and supply an exact date of surrender, your inspector will continue with the planning process for your annual inspection. Refusing to schedule an inspection may result in a noncompliance or adverse actions - and significantly more hassle and work for everyone involved.

If you have any questions about the surrender process, contact your Certification Specialist for assistance.

Unannounced inspections: Updated regulations for 2023

Early in 2023, the new Strengthening Organic Enforcement (SOE) regulations formalized unannounced inspections as part of the organic regulations.



Inspector Anthony Silvernail reviewing farm maps and buffers with a certified operator.

What does this mean for your certified organic operation?

PCO must conduct unannounced inspections on at least 5% of all PCO-certified organic operations each year. Your certified operation may be selected to participate in an unannounced inspection.

How are certified organic operations selected for unannounced inspections?

- Unannounced inspections are assigned based on several different factors:
- Random selection
- Follow-up on current compliance issues
- Part of an investigation
- General oversight conducted by PCO or the USDA National Organic Program (NOP)

Your inspector will disclose the reason for your unannounced inspection when they contact you about the inspection.

Who will conduct an unannounced inspection?

PCO works with a team of contracted and staff inspectors who will be authorized to conduct an unannounced inspection at your operation. Your inspector will provide you with an Unannounced Inspection Authorization Letter to explain the regulations and verify that they have been authorized to inspect your operation.

What will happen during an unannounced inspection?

Your inspector will explain the intent of the inspection when they contact you. Your inspector may arrive onsite to conduct an unannounced inspection, or, if your operation has the ability to share documents and information over digital platforms, you may be contacted by email to complete a remote unannounced inspection. Your inspector may conduct a partial inspection of your operation to examine one or a few specific

areas of the NOP regulations that have been determined ahead of time by PCO. Alternatively, your inspector may attempt to conduct a complete annual inspection if your time and availability allow.

What if I don't want to participate in an unannounced inspection?

Refusal of any NOP inspection, including unannounced inspections, may result in a noncompliance. The regulations require that all certified organic operations participate in unannounced inspections. Certain exceptions may apply for justified reasons, including death in the family, religious reasons, or illness.

Can an inspector call me to schedule an unannounced inspection ahead of time?

No, unannounced inspections are just that – *unannounced*. Inspectors may call a certified operation a few hours ahead of time to alert the operation of the unannounced inspection, but may not give more than 4 hours of notice. There are no exceptions.

Are all accredited organic certifiers required to conduct unannounced inspections on the operations they certify?

Yes, every organic certifier is required to conduct unannounced inspections on the operations they certify.

Am I responsible for additional inspection fees if I am selected for an unannounced inspection?

No, inspection fees and expenses associated with an unannounced inspection will not be billed to you.

Who should I contact about other questions I have about unannounced inspections?

If you have additional questions about unannounced inspections, please contact the PCO Inspections Team. You can reach us at inspections@paorganic.org or 814-422-0251.

Board Corner

Message from the President

JOE MILLER, BOARD PRESIDENT



Greetings!

As I write this quarter's President's message much is happening on farms across the country. Many of you are busy in the fields making the most of the growing season while praying for rain or a dry spell. We greatly appreciate and thank you for your work in growing the food and fiber to sustainably feed and clothe our nation and the world. Your work, while under-recognized, is not un-appreciated. Every day you prove that there is a better way to farm and process and the efforts to support your work are not in vain.

PCO is committed to being here to support you and your efforts to farm organically and sustainably in a way that improves your farm for future generations. The team at PCO continues to be a voice for the small family farmers who make up a large percentage of the organic farms in the country. You are the heartbeat of the organic community, the ones who led the charge for years to farm differently than a conventional model which prioritized production over value. We want to do what we can to make the organic certification process efficient and cost-effective for your farm. Recently, Diana Kobus was invited to speak on Capitol Hill to a group of Senators working on the farm bill. There, Diana advocated for the work of our family farms and the need for Congress and the USDA to not

forget the work you're doing while they are crafting the next version of the farm bill. This is a repeat of conversations we've had and continue to have in our involvement as a lead in TOPP (Transition to Organic Partnership Program).

PCO is in a unique position in the Northeast & Mid-Atlantic as the leading non-profit organic certifier in the east and near to the centers of political debate and law. This is not a position we take lightly and we welcome any feedback you have for us with regards to what we could do better to support your farm and farming community. How can we, and the organic community at large, do a better job at supporting those at the forefront of Organic food & fiber production while maintaining the integrity of the organic certification? This is part of conversations we've been having and work that's been happening through our administration of TOPP, or the Transition to Organic Partnership Program through the USDA's organic initiative. This program will support agricultural education programs and organic farmer mentors throughout the Mid-Atlantic and Northeast to assist farmers that are going Organic or working on improving their Organic farms. It provides wrap-around support, connecting transitioning operations with farmer mentors well versed in farming organically, as well as providing technical assistance resources to those who apply. To learn more about the TOPP program, apply for mentorship, or to apply to be a farmer mentor to up and coming transitioning to organic farmers, please check out our website page at <https://paorganic.org/topp/>

How else can we be a good partner? Send your feedback to me or our Executive Director, Diana Kobus. We want to hear from you. You can also keep an eye out for our annual client survey as we close 2023. Your feedback is reviewed and essential for decision making in 2024 and beyond.

Sincerely,

Joe Miller, joehasit@gmail.com • 717-385-4610
Managing Partner at Kalona Organics LLC

Organically Speaking

continued from inside front cover

Lyle Ferderber, who described his farm's and family's journey with great heart and great honesty. You can learn more about the journey of Frankferd Farms here.

A bustling spring continued with my being invited by Senator Fetterman to testify before the Senate Subcommittee on Food and Nutrition, Specialty Crops, Organics, and Research, on June 7, alongside four other representatives of the specialty crops sector on a panel for "Horticulture Title: How the Farm Bill Works for Specialty Crop Producers."

Our work leading the TOPP Northeast/Mid-Atlantic Region continues, and we have hired a full-time TOPP Program Director and TOPP Coordinator to facilitate this program. Look for

lots of events in the region this summer and fall to include TOPP-centered information and content. Along with our participation in the PA State Organic Transition program with TeamAg and Kitchen Table Consultants, we find ourselves at the center of a lot of attention on the incredible work you all do everyday, and we are so proud to help facilitate that work and amplify its importance.

Thank you for choosing and supporting PCO!

In service,

Diana Kobus
dkobus@paorganic.org • 814-571-3736

Diversity, Equity, and Inclusion at PCO

PCO's Commitment to Building a Diverse, Equitable and Inclusive Food System

DIANA UNDERWOOD, DIRECTOR OF OPERATIONS

In the last issue, we shared PCO's commitment to building a diverse, equitable and inclusive food system. This statement was a result of several training sessions, encouragement from facilitators, and many discussions as a team. In the end we knew that what we committed to says a lot about our DEI journey and where we were as an organization. It was also really important to our team that it not stop with the words on the page or website. It was important that we take action to back up our commitments.

Below you will find the commitments that are a part of our larger statement. We are making great progress to support these commitments with action. There will always be work to

do and so the team recognized quickly that we will need to really be intentional and focus our efforts in specific areas for this year and continue our work in future years.

Toward these commitments, PCO currently plans to:

■ **Undergo robust Diversity, Equity, and Inclusion training** that will continue to evolve as PCO staff and the organization embark on this journey.

This year we will utilize a survey for all staff and the Leadership Team to establish a baseline of where PCO is in relation to Diversity, Equity, and Inclusion work. This information will help inform where to begin with future trainings.

■ **Examine our practices and how we deliver our services** to ensure our assumptions, goals, and commitments are not in conflict with our mission of contributing to a diverse, equitable, and inclusive organic future.

PCO is fortunate to have the opportunity to serve on two cohorts committed to equity and learning. These are agriculture and organic focused and will result in specific actions we can then apply at PCO to support this work.

■ **Partner with stakeholders to increase access to the organic marketplace** to allow for business opportunities, job & training opportunities, and organic food for all.

PCO is partnering with an existing organic farmer training program to offer an internship which would support educational learning about job opportunities in the organic industry.

continued on page 18

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Certification Update

Cathy Jackson
Certification Program Manager



UPDATES ON STRENGTHENING ORGANIC ENFORCEMENT (SOE) RULE IMPLEMENTATION

As a reminder, the USDA published the Strengthening Organic Enforcement (SOE) final rule to amend the USDA organic regulations to strengthen oversight and enforcement of organic products. All operations can expect to be impacted, with new requirements related to increased documentation, proof of NOP imports and changes in supply chain oversight or labeling requirements. Operations must comply with these new requirements by **March 19th, 2024**.

At PCO, we have been working diligently to analyze the rule, revise our policies and forms, and develop a comprehensive training plan for all stakeholders involved. To keep you well-informed and prepared for these changes, we have established a timeline of key activities:

■ JUNE 2023:

- **Self-evaluation:** We sent a self-evaluation form to all PCO-certified operations, enabling you to assess the potential impact of the SOE rule on your operation. This worksheet is available on our SOE webpage at <https://paorganic.org/wp-content/uploads/2023/06/SOE-Client-Self-Assessment-Checklist.pdf>.
- **Referral incentive announcement:** We sent a letter along with the checklist mentioned above, announcing a referral incentive being offered to PCO-certified operations that refer new operations to PCO. Due to the changes in the SOE rule, many operations that were previously exempt (i.e. uncertified handlers) may now be required to become certified. We encourage these operations to apply in a timely manner to ensure compliance by the March 19, 2024 implementation date. New operations may also be eligible for a discount.
- **SOE webpage launch:** We launched a dedicated SOE webpage (<https://paorganic.org/strengthening-organic-enforcement/>) on the PCO website. This page will serve as a valuable resource, providing information and updates on the implementation process.

■ JULY 2023:

- **Webinar and Town Hall Save-the-Dates:** Look out for our announcement of Save-the-Dates for SOE webinars and town halls. These events will offer an opportunity for you to engage directly with us, ask questions, and address any concerns you may have.

■ EARLY FALL:

- **Revised Organic System Plan (OSP) forms available:** We will be sending revised OSP forms to both applicants

and existing clients. These updated forms will align with the requirements of the SOE rule.

- **Training opportunities:** We are committed to ensuring that you are well-prepared for the changes brought by the SOE rule. Therefore, we will provide various training opportunities, including webinars and town halls, to help you navigate the new requirements effectively.

■ BY OCTOBER 31, 2023:

- **Application submissions:** New applicants must submit their applications by this date to ensure certification prior to the March 19, 2024 implementation date.

If you have questions on the impact SOE may have on your operation, please contact your certification specialist as soon as possible. While the paperwork may not be ready until later this year, we urge you to evaluate the potential impacts SOE will have on your operation by using the SOE Self-Evaluation worksheet (sent to you in June and available on the PCO SOE webpage) and start planning ahead, especially if this requires operations within your supply chain becoming certified. By doing so, you can mitigate any certification status impact, such as noncompliances, and avoid potential market disruptions after the implementation date of March 24, 2024.

2023 INSPECTION SEASON REMINDERS

PCO expects all inspections to be conducted onsite in 2023. If personal illness, biosecurity restrictions, or other unpreventable barriers arise that limit the inspector's ability to be onsite, you must contact PCO to discuss contingency inspection plans.

Please communicate promptly when your inspector contacts you for scheduling. Failure to respond to 3 requests to schedule an inspection may result in a noncompliance for Inspection Refusal. Failure to communicate inspection cancellations to your inspector 5 days ahead of your planned inspection date may result in a noncompliance, a \$100 inspection cancellation fee, and any additional incurred inspection-related fees. Rescheduling an inspection more than 3 times will result in a noncompliance. Exceptions to these policies may be made for justified reasons, including death in the family, religious reasons, or illness.

Operations that have been contacted by their assigned inspector and have not agreed to a proposed inspection timeframe by October 31 will be issued noncompliances for inspection refusal per 205.406(b).

Recordkeeping audits will be completed at every inspection. Inspectors will conduct traceability audits to verify your records account for organic products moving through your operation and the supply chain, and mass balance audits to verify your records account for all quantities of organic products moving into and out of your operation. Actual products audited will be determined by the inspector during the inspection process.

Unannounced inspections are required by the USDA-NOP regulations. Your operation may be selected for an unannounced inspection based on risk, compliance issues, or at random. Participation in unannounced inspections is required. Failure to participate may result in a noncompliance.

Materials Update

Hector Nunez C.
Materials Program Assistant Manager



HERBICIDES USE DURING DRY WEATHER CONDITIONS

I would like to start this topic with thankfulness for everything that farmers do for our environment, our food system, and our communities. I would like to acknowledge that this has been a difficult year with complicated weather conditions for farming. With drought conditions, certain weeds can overpower pastures, and using the wrong herbicides can hurt your crops, pastures, the environment, and those using or around herbicides. Several Certification Specialists suggested this topic as a matter of concern for the readers. I do want to make a parenthesis that Integrated Pest Management teaches us that use of a chemical control, such as herbicides, is a last resort. These should be used when other methods of control have failed. The restriction on most herbicides is as follows: *Weed Control: May only be used if preventive, mechanical, and physical management practices provided for at 205.206(e) are met. The operator must document conditions for using the substance in an organic system plan.*

Herbicides are materials used to kill or hurt a plant that is identified as a weed. Examples are unwanted plants that may compete with your crop, poisonous plants that may hurt your livestock, or plants that are undesired in the location that they are planted. There are many different modes of action for herbicides but they mainly fall under two categories. Selective herbicides attack only certain kinds of plants but do not affect others. These are quite common in the conventional industry but not common in the organic industry. Broad spectrum herbicides are herbicides that attack any plant that comes into contact with the herbicide. An important technical term for this topic is also the definition of adjuvants. Adjuvants are materials that help herbicides work better and may be considered inactive ingredients in a herbicide mix. Examples include adjuvant materials that are water pH adjusters, stickers, spreaders, etc. The selective treatment of broad spectrum herbicides in troublesome areas is the recommended practice. This leads to a low cost and high effectiveness.



Herbicide Injury to Soybeans by United Soybean Board.

Herbicides that have a status of Allowed or Allowed with Restrictions in the National Organic Program fall under different categories. At PCO, herbicides can be found under the intended use of **Weed Control**. In the OMRI material review decisions, herbicides are found under the category of **Crop, Pest and Disease Control with a General Use Herbicides**. WSDA also reviews herbicides under the intended use of Disease and Pest Control with a General Use Herbicides. CDFA does not review anything outside of fertilizers and soil amendments. Adjuvants are listed as crop production aids and may be allowed with restrictions. Please remember that PCO accepts the review decisions of CDFA, WSDA and OMRI but that information is published by those Material Review Organizations through their own means. PCO does have access to that information and you may request guidance to obtain it.

As always, if you have any other material needs, 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! Remember to first collect your intended use, the full material name, and the material manufacturer name. For more technical questions, feel free to dial extension 3 or email us at materials@paorganic.org

We sincerely appreciate your business and everything that you do for our food system.

TOPP Update

Leilani Durand
TOPP Program Director



The Transition to Organic Partnership Program (TOPP) is a new USDA Initiative that is investing up to \$100 million over five years to provide education, technical assistance, and support to help producers transition to organic. The goal of this initiative is to help grow the organic sector.

TOPP funding will support several components including farmer to farmer mentoring and technical assistance training.

■ Farmer To Farmer Mentoring

Farmers who are transitioning their operations to organic production will be paired with experienced certified organic farmers in their region. Mentors will be compensated to provide one-on-one support to the organic mentee farmer during transition.

■ Technical Assistance and Training

Fields days, workshops and other events will be held across the region to provide education on agronomy, certification, regulations, and market and business support.

If you are interested in getting involved please fax your interest to PCO at 814-422-0255 or submit the interest request form on the PCO website. Mentor and mentee applications are available now! The first farmer to farmer pairings will begin in November.

Standards & Policy Update

Kyla Smith, Certification Policy Advisor
NOSB Member, USDA Accredited
Certifying Agent Seat, 2021–2026



SPRING 2023 NOSB MEETING RECAP

In April 2023, the National Organic Standards Board (NOSB) held their Spring bi-annual meeting in Atlanta, GA to deliberate and vote on the topics before the board. The meeting kicked off welcoming the two new board members, Mr. Nate Lewis, and Dr. Franklin Quarcoo, who were each appointed to a Resource Conservation seat. We were then graced with additional welcoming remarks by a panel of speakers participating in the Southeast Region Transition to Organic Partnership Program (TOPP). Speakers included Billy Mitchell with Florida Organic Growers (FOG), Don Cooper with the Georgia Organic Peanut Ass’n (GOPA), Dr. Shandrea Stallworth with the Rodale Institute, Roland McReynolds, a CFSA farmer serving North and South Carolina, Michael Wall, the director of farmer advocacy at Georgia Organics, and Paul Sorah of Hearts of Harvest Farm. The panelists provided an orientation of organic agriculture in the southeast along with an up-close look at its history, challenges, opportunities, and the work being done to bring about equity and economic improvements, including the power of diversity, networking and organic farm incubation through organized community and organizational support. This highlighted how important TOPP investments are to communities in the southeast and how it was designed to harness the power of partnerships.

The board deliberated and voted on two agenda items (see table below):

In addition to the items listed in the table, the board also considered six discussion documents at the Spring 2023 meeting:

- **Climate-Induced Farming Risk and Crop Insurance:** provides background information and poses questions for stakeholders regarding the shortfalls of organic crop insurance, aiming to fill the knowledge gap and identify areas for improving risk-management tools for organic farmers.

- **Consistent Location Identification:** exploring the requirement for a consistent way for operations to report and certifiers to verify parcel location/identification to improve supply chain traceability and oversight and deter fraud.
- **Potassium Sorbate (CROPS):** petition for the use as an active ingredient for plant disease and insect control/suppression in field and greenhouse applications.
- **Research Priorities:** presents the NOSB’s annual list of research priorities for organic food and agriculture.
- **Excluded Methods:** seeks feedback on plant breeding techniques that are included on the “To Be Determined (TBD) List” and whether the techniques should be prohibited under the existing definition of the excluded method. Techniques include Tilling, Double Haploid Technology, Induced Mutagenesis, and Transposons.
- **Technical Report Template Update:** explores updates to the template for Technical Reports and additional questions for materials that are at risk for Excluded Methods.

This was also the first meeting of the sunset review process for the 2025 Sunset substances. The board discussed all the substances set to sunset from the National List in 2025. The board will vote on these substances at the Fall 2023 meeting.

Lastly the board considered virtual vs. in-person public (oral) comments as other business and how the options of one or the other impact equal public access to the meetings and in-person attendance. No matter how the board decides to proceed with this topic at future meetings, it was clear that there was interest in exploring ways to increase in-person meeting attendance that does not rely on in-person oral comments, as well as opportunities for board members to engage with stakeholders.

SAVE THE DATE
Fall 2023 meeting, to be held in Providence, RI
October 24–26, 2023.

Oral comments will be heard the week before on October 17 and 19, 2023. Visit the webpage for additional information as it becomes available, including the agenda and when and how to submit written comments and register for oral comments.

SUBCOMM.	PROPOSAL AND VOTE	OUTCOME
CACS	Motion to accept the proposal on Organic is Climate Smart: 14 Yes, 1 Absent.	PROPOSAL PASSED: Recommendation is referred to USDA.
Handling	Motion to approve the recommendation that resins used in the ion exchange filtration process do not need to be listed on the National List: 12 Yes, 1 No, 1 abstention, 1 absent.	PROPOSAL PASSED: Recommendation is referred to USDA.

New Members

PCO Welcomes 2nd Quarter
New Members!

NEWLY CERTIFIED ORGANIC

ABR Farm

Sugarcreek, OH

Ahara, LLC

Rockville, MD

Merle Burkholder Farm

Mifflintown, PA

Clover Valley Creamery LLC

Quarryville, PA

Cole Ehrisman

Juniata, PA

Demick Farms, LLC

Hammond, NY

Adam Emrich

Polkton, NC

Klint Frey

Conestoga, PA

Jennifer Gira

Womelsdorf, PA

Jacob Girod

Owingsville, KY

Joe Girod

Means, KY

Hodie Meats Inc.

Alto, GA

Key View Farms LLC

Keymar, MD

M&K Family Farms, LLC

Catawissa, PA

Jason Martin

Himrod, NY

Donald Miller

Kreamer, PA

Sam A. & Lydia L. Miller

Antwerp, NY

Natural Biologics, Inc.

Newfield, NY

Randall Nolt

Honey Grove, PA

R & S Flinchbaugh LLC

York, PA

Rise Oil Company, LLC

Hanover, PA

John A. Sauder

Dundee, NY

Ervin Sensenig

Shiloh, OH

Reuben Sensenig Farm

Monroe, NH

Aaron E. Stoltzfus Jr.

Quarryville, PA

Stoney Lane Organic Farm Inc.

New Hope, PA

Nelson Talley

Stanly, NC

Vigor Greens LLC

Swarthmore, PA

Mervin Zimmerman

Shelby, OH

Richard Zimmerman

Reinholds, PA

Ryan Zimmerman

Blain, PA

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Broomfield, CO

NEW ADVOCATE MEMBERSHIP

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Sharon, MA



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Marketplace

CROPS

Organic wrapped balage for sale. wet bails: \$50 each; 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 hay for sale. Grass legume balage, can deliver. \$70 per bail. Call 315.823.2671. Herkimer County.

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

EQUIPMENT

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

SERVICES

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



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Rotational Grazing Systems

continued from page 9

Titus and Suzette discussed understanding the forage demand of grazing animals. For example, a grazing animal needs to have daily access to anywhere from 2 to 4 percent of their live body weight per day in pounds of forage dry matter, depending on species and lactation (a grazing cow requires about 3.5 percent). By estimating the amount of dry matter available within a given area and using this dry matter required figure, Titus explained, a grazing manager can then calculate grazing area required for a given herd.

Grazing paddocks for some species can be calculated to last multiple days, but for dairy herds, it was noted, quicker movement is optimal in order to keep production consistent and strong. Quicker, more frequent movement of the grazing herd, in general, will give the animals more regular access to high quality forage in-pasture and, when paired with adequate paddock rest periods, can lead to more productive pastures.

Current recommended rotational grazing strategies often emphasize considering shorter grazing periods for a given paddock, leaving taller residuals and recognizing that lower harvest per grazing event will give rise to more grazing events per season – amounting to a cumulative greater net harvest off pasture over the course of the year.

As the day wrapped up, apprentices Amber and Jessica talked further with Titus and Suzette about different ideas and strategies they might be able to try on their host farms, in the interest of furthering their own understanding of managed grazing systems. Attendees filtering out to their cars received grazing sticks, courtesy of NRCS and the PA Grazing Lands Coalition, to help them gauge dry matter available in their own pastures.

Gay left the dispersing group to begin running the sanitizer cycle in the milk house, and in the paddock on top of the hill the cows patiently waited at the paddock gate.

Check out PASA's full calendar of farmer-to-farmer events and learn more about Dairy Grazing Apprenticeship at pasafarming.org. PASA is a Pennsylvania-based sustainable agriculture association founded in 1992 working to build a more economically-just, environmentally-regenerative, and community-focused food system through education and research that directly supports farmers.

Diversity, Equity, and Inclusion at PCO

continued from page 13

With so much work to do it is important we begin the work one step at a time. We cannot wait to take action and yet there will always be more actions to take. We are in this work together as individuals, organization, and an industry. Together we can build a diverse, equitable and inclusive Food System that is built by all of us for all of us.

You can read more about PCO's commitment to DEI on our website: <https://paorganic.org/dei-at-pco/>.

Event Calendar

All times listed are Eastern Time Zone unless otherwise indicated.

*** Notes a TOPP Core Partner Regional Event

AUGUST

AUGUST 3 ***

NOFA- NH

Intensive Rotational Grazing and Grassland Management

Peterborough, NH

www.nofanh.org/craft

AUGUST 4 ***

Virginia State University Extension

Agroforestry Farm Tour

What the Farm, Virginia Beach, VA

www.ext.vsu.edu/events/2023/8/22-small-farm-orientation

AUGUST 7

PASA

Moving a Farm: Rethinking Design at Sol Patch Garden

Sol Patch Garden, Braddock PA

6:00PM - 8:00PM

<https://pasafarming.org/event/rethinking-design-at-sol-patch-garden/>

AUGUST 8-10

Ag Progress Days

Russell E. Larson Agricultural Research Center, Pennsylvania Furnace

<https://agsci.psu.edu/apd>

AUGUST 9

Penn State Extension

Organic Grain Production Research Field Day

9:45 AM - 12:00 PM

Fairbrook Park, Pennsylvania Furnace, PA

<https://extension.psu.edu/organic-grain-production-research-field-day>

AUGUST 14 ***

NOFA-VT

Organic Certification for Vegetable Farms

Brookfield, VT

www.nofavt.org/farm-summer-events

AUGUST 22 ***

University of Maine Extension

Poultry Farming

Thomaston, Maine

<https://extension.umaine.edu/agriculture/new-farmer-farm-visit-series-poultry-farming-in-thomaston/>

AUGUST 23 ***

MOFGA

Pasture Management & Diversified Livestock

Bowdoinham, Maine

www.mofga.org/event-calendar/pasture-management-and-diversified-livestock/

AUGUST 23

RODALE

Specialty Crop Symposium

8:30 AM - 4:00 PM

Rodale Institute Pocono Organic Center, Long Pond, PA

<https://rodaleinstitute.org/events/specialty-crop-symposium/>

AUGUST 28 ***

NOFA-VT

Maple Regulations: Organic Certification & Food Safety

Highgate, VT

www.nofavt.org/farm-summer-events

SEPTEMBER

SEPTEMBER 6

PASA

Launching an Agroforestry Project at Wild Fox Farm

1:00 PM - 3:30 PM

Wild Fox Farm, Bally, PA

<https://pasafarming.org/event/launching-an-agroforestry-project-at-wild-fox-farm/>

SEPTEMBER 7 ***

NOFA- NJ

North Jersey RC& D: No-Till & Regenerative Grazing Conference

Washington, NJ

www.northjerseyrcd.org

SEPTEMBER 7 ***

NOFA-NY

CRAFT Seed Saving

Windmill Farm, Montgomery NY

www.glynwood.org/what-we-do/farm-training/mid-hudson-craft.html

SEPTEMBER 20

PASA

Grower to Grower Tour: Stacking Enterprises at Apple Ridge Farm

4:00PM - 7:00PM

Apple Ridge Farm, Saylorsburg, PA

<https://pasafarming.org/event/stacking-enterprises-at-apple-ridge-farm/>

SEPTEMBER 21 ***

NOFA-NH

Applying Sustainable Practices on Small-Med Size Farms

Warner, NH

www.nofanh.org/craft

SEPTEMBER 26

Strengthening Organic Enforcement (SOE) Town Hall

Gap Fire Co., 802 Pequea Ave, Gap, PA 17527

Postcard Invite Coming Soon

SEPTEMBER 28

Strengthening Organic Enforcement (SOE) Town Hall

PCO Office, Spring Mills, PA

Postcard Invite Coming Soon

OCTOBER

OCTOBER 3

Save the Date!

Strengthening Organic Enforcement (SOE) Town Hall

Penn Yan, NY

Postcard Invite Coming Soon

OCTOBER 4

Save the Date!

Strengthening Organic Enforcement (SOE) Town Hall

New Berlin, NY

Postcard Invite Coming Soon

PCO on the Road



For **Organic Week 2023**, the Organic Trade Association partnered with The Organic Center to present the 2023 Organic Confluences: Reducing Plastics Along the Entire Organic Supply Chain.

PCO Policy Advisor, Kyla Smith, served on a panel discussing organic regulations and plastics. The panel addressed the history of plastic in rulemaking for NOP, and updates from NOP on the status of plastic regulation in general and specifically for organic. The panel also focused on international policies that regulate plastic, focusing on the E.U., as they have been leading the charge to reduce plastic along the supply chain.

1 Pictured Left to Right: Amber Sciligo, Director of Science Programs at The Organic Center, Katherine DiMatteo, PCO Board Secretary and Independent Consultant, Lisa Erdle, Director of Science & Innovation at The 5 Gyres Institute, Kyla Smith, PCO Policy Advisor, and Chris Anderson, VP at Sustainable Strategies.

On May 12th, 2023 USDA Under Secretary for Marketing and Regulatory Programs Jenny Lester Moffitt and Pennsylvania Secretary of Agriculture Russell C. Redding met community members at Chatham University's Eden Hall Campus to discuss the USDA's recent launch of the **Organic Market Development Grant Program**, part of the historic Organic Transition Initiative, USDA's multi-agency effort to support farmers transitioning to organic production and to build and strengthen organic markets.



2 USDA Under Secretary Jenny Lester Moffitt speaking about the importance of supporting organic agriculture in the U.S. and how organic farming improves food systems and the greater communities regionally.

3 Lou Leonard, Dean of the Falk School of Sustainability & Environment, led a tour of Chatham University's Eden Hall Campus.



4 On Wednesday, June 7th PCO Director Diana Kobus provided testimony at a **Senate Subcommittee hearing for Agriculture, Nutrition, and Forestry**. Representing the organic community, her testimony focused on the challenges organic, specialty crop producers face and how the Farm Bill can better support them. Testimony highlights included transition incentives for small farm certification, new and better connected infrastructure (including organic processing and distribution facilities), and qualification of certified organic operations for any "climate smart" benefits based on the ecosystem services they provide. In addition, Diana outlined specific program requests for the 2023 Farm Bill, including some already highlighted in this issue's policy feature (pg.2). To view the video and Ms. Kobus's full testimony, visit agriculture.senate.gov.



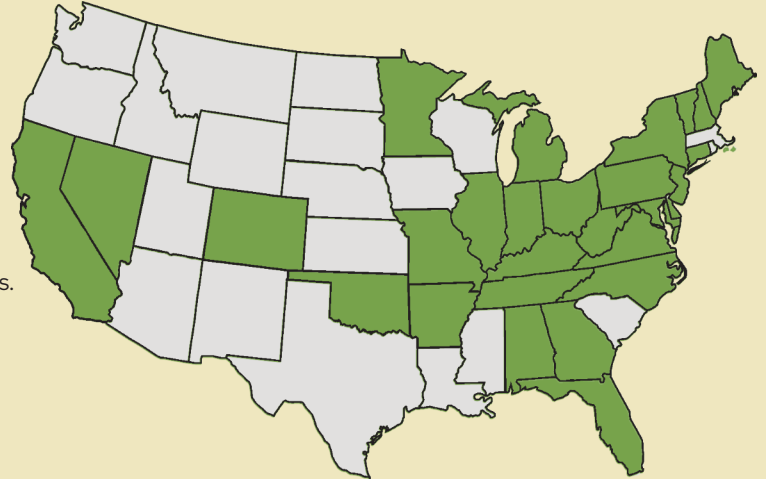
2022 ANNUAL REPORT

PCO continues to be the 5th largest certifier in the US

— following, CCOF, MOSA, OTCO and QAI*

PCO certifies operations in **28 states**.

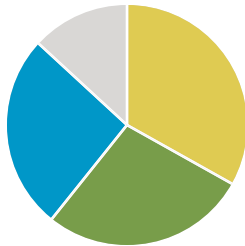
Each year we grow our organic community by certifying new clients. In 2022, we welcomed **133 Newly Certified Clients**.



**based on data pulled from the Organic Integrity Database 2/2022 (organic.ams.usda.gov/integrity)*

1,583 TOTAL ORGANIC CERTIFICATIONS

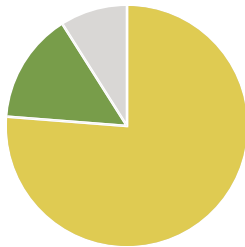
● Poultry	33%
● Crops	28%
● Ruminant	26%
● Handling	13%



2022 FINANCIALS

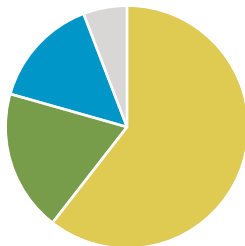
TOTAL INCOME

● Certification	\$3,263,385
● Inspection	\$707,362
● Other*	\$320,751
TOTAL:	\$4,293,176



TOTAL EXPENDITURES

● Payroll	\$2,551,775
● Inspection	\$859,048
● General & Administration	\$610,572
● Other	\$201,363
TOTAL:	\$4,222,758



*Includes TOPP funding.

STRATEGIC INITIATIVES FOR 2022

MARKETING AND BRANDING – Develop a marketing plan to increase visibility and brand recognition of PCO in the organic industry

This is still a priority for 2023/2024. PCO needed to recalibrate our priorities to accommodate the work we have been given as the Northeast/Mid-Atlantic Regional Lead in the USDA's Transition to Organic Partnership Program.

FINANCIAL STABILITY – Focus on financial stability and capitalize on revenue streams to support PCO's growth

PCO's approach to this area was also impacted by the addition of funds for TOPP and the responsibilities we have to this program, particularly in year one. Some of these initiatives are being pushed to 2023/2024.

CERTIFICATION – Work closely with staff to streamline the certification process to provide highly responsive customer service, while keeping the highest standards and integrity in the organic industry

We created a new position for Policy, hired a new Certification Director, and continue to explore efficiencies in our processes and utilizing the current database.

WORKPLACE EXCELLENCE – Establish PCO as a 'best place to work'

We initiated a full staff retreat once/year to help with engagement in a remote work environment, and we have surpassed our goals in this area with a Net Promoter Score of 56.

A COMMITMENT TO DIVERSITY, EQUITY AND INCLUSION (DEI)

Throughout 2022, the PCO staff continued to have conversations to better help us understand how we can build a more just, inclusive culture within our organization and how this can impact the larger organic industry.

- Understanding Cognitive Diversity
- Fostering Connected Communication
 - Creating a Culture of Respect
 - Effectively Resolving Conflict

PCO staff and board have crafted a DEI purpose statement which embodies how we want to show up in this work:

At PCO, we recognize the impacts of systemic racism and oppression in our global food system. We understand that our work is directly linked to people, the planet, and systems that perpetuate disparity. Given PCO's role as an organic certifier within the larger agricultural system, we are committed to supporting and advancing just relationships with each other and the environment. PCO is committed to building our allyship for a world where certified organic agriculture is part of the solution. We are working toward a healthy environment and equitable food system for all and by all.

PCO's VISION A world where agriculture systems prioritize health, ecological balance, fairness and care.

PCO's MISSION To uphold and advance organic principles and practices through certification, advocacy, and technical support.

PCO's 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.



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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

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)
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