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The Rising Waters

The storms and flooding during the week of December 3, 2007 changed the lives of so many families and businesses in Western Washington. It was an especially heartbreaking week for the rural communities of Lewis, Grays Harbor, Mason, Thurston, and Pacific Counties. First-hand accounts from flood victims in Lewis County state over and over again how quickly the waters rose and how little warning they had. As a result of the record high waters, farms in these areas not only experienced destruction to their property and fields, they also experienced major losses to their homes, to their equipment, and to the lives of their livestock.

The rising waters of the Chehalis River hit my hometown of Chehalis especially hard. The mud and debris is everywhere ... on the signs along the highway, in the aisles of the grocery stores, and on the boots of the children heading to school. Writing this, ten days after the flooding, it is difficult to visualize a silver lining that is bright enough to give some reassurance that the tractors will run again and all will be OK when it comes time to plant seeds this spring. (See related story, *Flooded Fields—Effect on Organic Status*, on page 2.)

However, perhaps the silver lining of this disaster actually started growing the moment the water started rising. As neighbors helped evacuate their neighbors via boat, as individuals opened up their homes to those without a place to sleep, as meals were prepared and livestock were delivered to safe pastures, a glimmer of hope was growing on each of these farms. Strangers have been steadily showing up with supplies, some not even saying a word to the home owner but simply picking up a shovel and starting to scoop out the silt that was left in the kitchens, barns, and storage sheds of our community.

As these farms continue to cleanup and rebuild, I am confident that the rebuilding of community support for agriculture will also continue to grow in these areas. When threatened, there was an immediate and heart warming response by the public to the farms and farmers. In the aftermath of this disaster, it is even more evident that without the support of our communities, local agriculture will suffer a threat far greater than the rising water.

On behalf of the WSDA Organic Food Program Staff and Advisory Board, we are saddened by the losses to our agricultural community and offer our support to those farms that we so proudly serve.

By Brenda Book, Organic Certification Coordinator

Flooded Fields - Effect on Organic Status

After the severity of the floods became apparent to the public, our office began to receive calls from both concerned farmers and concerned consumers regarding the ability of flooded organic farms to continue to grow certified organic crops. What sort of residues would the receding floodwaters leave behind on the soil?

Organic Certification involves an annual evaluation of a farm's sites, fields, and borders, which includes evaluating any potential contamination issues. Each farming operation is inspected and reviewed on a case-by-case situation. On farms in an area that pose a risk of contamination from prohibited materials, samples will be taken to determine if the land and crops comply with organic standards.

If you are a certified grower in a flood area and have questions about the status of your organic sites, please contact our office at 360-902-1805 or email: organic@agr.wa.gov.

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Back issues are posted on our website: <http://agr.wa.gov/FoodAnimal/Organic/default.htm>

Calendar

Oregon Tilth's 33rd Annual Conference Jan. 18-19. Organic Integrity: Principles, Practices, and Opportunities, Salem, OR. For information, email: joshua@tilth.org

Harvesting Clean Energy Conference VIII. Jan. 27-29. Portland, OR. For information, go to www.harvestcleanenergy.org

WSU Fruit School on Competitive Orchard Systems, Jan. 29-30. Wenatchee and Yakima, WA. For information call 509-422-7245.

Organic Seed Alliance's Fifth Biennial Organic Seed Growers Conference, Feb. 14-15. Salem, OR. For information visit www.seedalliance.org.

Small Farms and Direct Marketing Conference, Feb. 16.

Corvallis, OR. For information visit <http://calendar.oregonstate.edu>

Oregon Dairy Farmers Annual Convention, Feb. 25-27. Sunriver, OR. For information call 503-229-5033 or email marilyna@oregondairycenter.org.

Hay Quality and Assessment Training, Apr. 14. Issaquah, WA. Contact Janet Clarke at 206-205-3105, or visit www.king.wsu.edu/livestock/Calendar.htm.

National Dairy Leaders Conference, Apr. 15-17. Stevenson, WA. Contact Chris Galen at 703-243-6111 or David Pelzer at 847-627-3233 or visit www.dairyevents.com.

Is Organic Greenhouse Production Possible? Yes! April 19. Everett, WA. Contact Peggy Campbell at 425-357-6024 or visit snobomish.wsu.edu/calendar.htm

The 6th Annual Sustainable Living Conference, April 20. Olympia, WA.

Mission Statement

The WSDA Organic Food Program protects consumers and supports the organic food industry by ensuring the integrity of organic food products. The program certifies organic producers and handlers to US National Organic Standards and enforces organic standards in Washington State. The program supports the development of export markets by providing certification to foreign organic standards.

Contact Maggie Philipsborn at synergy@evergreen.edu, phone (360) 867-6493 or visit: www.evergreen.edu/synergy.

Inspector's Corner

Finding Materials Approved for Organic Production

As a new inspector, I quickly learned that the Brand Name Materials List, or BNML, is a key resource. I've come to know and rely on the BNML, or "Bonemeal" List. The Brand Name Materials List is mailed with all application packets, and it is available on our website. I hope that this article will encourage more clients to refer to this management tool.

The BNML serves two purposes. If you know the brand name of the material you would like to use, the list can help you to determine if the material is allowed for use in organic production, along with restrictions, if any, on its use. If you know the type of material you need, e.g. a fertilizer, the list can be used as a product resource, and help you to find an approved fertilizer.

The BNML begins with a list of the names and contact information for representatives of each company whose products are listed. After that, the list is presented in three ways: Sorted by Brand Name, Sorted by Company, and Sorted by Type of Product. Each section contains the same information. The third section, Sorted by Type of Product, makes it simple to find a material if you know the product category. Product categories include Processing Aids, Post Harvest Materials, Crop Production Aids, Disease & Pest Control, Fertilizers & Soil Amendments, and Livestock Production Aids. A column that lists the product sub-types gives further information about the product.

Within each of these three sections, see the column titled *Restrictions*. Restrictions may be as

follows: *None* (there are no restrictions); *Label Use Only* (see the product label for allowed uses); or *Soil deficiency must be documented by testing* (provide evidence that you needed to use the material). Other types of restrictions are listed in the BNML.

Although I rely primarily on the BNML, it is only one of our resources. I also use the OMRI



Products List, and the OMRI Generic Materials List, both published by the Organic Materials Review Institute. They are available online at www.omri.org, or a hard copy is available from the Organic Food Program. Another resource I use is the National List of Allowed and Prohibited Substances, published by the National Organic Program (NOP). Go to the National Organic Program website to review the complete list, <http://www.ams.usda.gov/nop/indexIE.htm>.

**To all our customers:
When inspecting, I'm
impressed by your
innovative methods and
passion to ensure
organic integrity.
You make my job very
enjoyable.
Thank you.**

If you need assistance using any of these resources, please contact our office by phone, letter, or email. For example, a farmer wanted to use a product labeled "for organic gardeners". It was not listed in BNML or OMRI. We determined that it contained only natural ingredients, and was allowed for use. We monitor all materials used, because organic integrity is our mutual program cornerstone.

To all our customers:
When inspecting, I'm impressed by your innovative methods and passion to ensure organic integrity. You make my job very enjoyable. Thank you.

By Mike Hackett, Organic Field Inspector.

Farmers Market Surveillance

As more consumers shop at Washington's farmers markets for their organic products, there is an increasing need to maintain the organic integrity of the products sold at these markets. In response to concerns from both consumers and certified organic farmers, the Organic Food Program expanded its inspections at farmers markets. Enforcing organic standards is critical to ensuring consumer confidence in organic products, and creating a level playing field for certified organic vendors.

At each farmers market inspection, the inspector met with the market manager to understand how they verify organic claims being made by vendors at their market. After meeting with the market manager, each inspector toured the farmers market and visited each stand making organic claims, to ensure that organic products were being labeled properly. In 2007, the Organic Food Program targeted farmers markets in Western Washington since they have the highest volume of organic sales. A total

of 30 markets were inspected, representing approximately 25% of the state's farmers markets. Market stands of dozens of certified operators were inspected to ensure that the grower was selling only organic products for which they were certified.

“Organic consumers want to see the faces and know the stories behind the products.”

Laurie Demeritt, The Hartman Group, heard at the 2007 Washington Tilth Annual Convention.

In addition to inspecting certified organic market stands, we also identified 20 stands that were making organic sales and were not certified organic. Most of the larger farmers markets require growers to be certified if they are selling organic products. Smaller markets often allow non-certified growers to label their products organic.

Under federal and state law this is allowed as long as total organic sales do not exceed \$5,000 per year and the grower complies with the National Organic Standards. Seven of these stands had sales over \$5,000 and they were notified that they could not make organic claims unless they obtained certification. Follow-up inspections were conducted to ensure that these growers were not making organic claims. The remaining 13 non-certified stands were provided information about organic standards and notified of the organic requirements.

In two situations we identified growers selling conventional fruit as organic. We are pursuing penalties against the growers involved and the outcome has not been finalized. The Organic Food Program increased its presence at the state's farmers markets in 2007. We plan to expand this program in 2008, to enforce organic standards and ensure that organic products are properly labeled.

By David Simpson, Organic Food Inspector



This photo was taken in Quincy, WA., where they celebrate “Farmer-Consumer Awareness Days” each September.

WSDA International Program

The WSDA European Organic Verification Program (EOVP) began in 2004 out of a need to ensure access to the EU market for WSDA certified organic products. Organic certification through this program verified compliance with European Regulations and equivalency with IFOAM Basic Standards and Soil Association Standards. (IFOAM is the International Federation of Organic Agriculture Movements. Soil Association is the largest certification agency in the UK).

Since the implementation of the EOVP, foreign standards have changed. In order to ensure that we remains in good standing with IFOAM accreditation criteria, and remains a respected foreign certification agency in the EU, a reassessment of the program was required.

As part of this reassessment, the WSDA International Program has changed as follows:

- The International Program now offers producers, handlers, and processors the ability to apply with one application for evaluation under both the European Organic Program as well as the Japan Organic Compliance Program!
- A new international logo has been developed and is available for use by certified operations.
- European Certification is now on a site-by-site basis. Crops certified under the European Program must be located on a designated site that does not include crops produced under different management systems such as US-NOP organic, transitional, or conventional. It may be necessary to split or divide your existing sites to meet this requirement.
- Simultaneous, or parallel, production on a farm of the same variety of a crop under a EU organic production system and another production system (such as US-NOP organic, transitional, and/or conventional crops or products) is only allowed if



production is undertaken in a way that allows clear and continuous separation of all crops.

- For farms that engage in parallel production, an additional inspection must take place during harvest to evaluate separation of the different crops. These operations will be billed for these additional inspections at a rate of \$40/hour.
- All operations involved in the chain of custody of an organic product that is exported to Europe must be inspected and certified, including storage facilities, brokers, or marketing operations that are otherwise exempt from certification under the US National Organic Standards.

Please refer to the WSDA International Organic Program Additional Requirements for complete details on the programs offered and the requirements for certification. If you have any questions or concerns, contact our office at (360) 902-1805 or email us at organic@agr.wa.gov.

By Brenda Book, Organic Certification Coordinator

Farewell to Jenn

After five years with the WSDA Organic Food Program, Jennifer Santos-Watson left the program for a position with the Department of Ecology Water Quality Program. During her time with the Organic Food Program, Jenn centralized the fee and billing process. This led to improved timeliness, accuracy, and consistency in collecting fees, and supported the program's financial goals. Jenn also supervised the administrative staff. She was an excellent supervisor who supported her staff in meeting our customer's needs.

I have learned a lot from Jenn over the last five years. She has supported me with countless projects, helped me with things I didn't know I needed help with, and she has taken on many things that needed to get done.



Thank you, Jenn, for all of your love and support. I wish you the best in all of your future endeavors. We will miss you. *By Miles McEvoy, Organic Program Manager*

Updates on Organic Standards

Minor Ingredients Used in Processing

In June 2007, USDA published an interim rule regarding the use of 38 nonorganic minor ingredients in certified products. Please note that to date, a final rule regarding Section 205.606 has not been published and the use of an ingredient on the interim rule remains compliant with the National Organic Standards. Contact our office regarding any questions about this standard. 360-902-2090

Bedding for Livestock

The NOP standard §205.239(a)(3) requires a livestock operator to provide “[a]ppropriate clean, dry bedding. If the bedding is typically consumed by the animal species, it must comply with the feed requirements of 205.237,” meaning that the bedding must be certified organic.

Please note that if organic livestock is properly nourished, and the straw is free of edible materials, then an organic dairy may use conventional straw for bedding purposes. If an animal consumes the straw, then the straw must be from a certified organic source. This will be evaluated at each inspection.

Processed Manure

Processed manure is now allowed for application without a preharvest interval if it meets the following requirements:

Processed manure products must be treated so that all portions of the product, without causing combustion, reach a minimum temperature of either 150°F (66°C) for at least one hour or 165°F (74°C), and are dried to a maximum moisture level of 12%; or an equivalent heating or drying process could be used. In determining the acceptability of an equivalent process, processed manure products should not contain more than 1,000 MPN (Most Probable Number) fecal coliform per gram of processed manure sampled and not contain more than 3 MPN Salmonella per 4 gram sample of processed manure.

Handlers and Processors — Does Your File Tell the Full Story?

Whether applying, renewing, or providing updates, our office depends on you to submit accurate and complete information. Each file tells its own story, and along with the inspection reports, we use those stories' details to make important decisions regarding your certification.

Learning about operational changes for the first time from an inspection can turn into extra work for the inspector, the WSDA office, and yes, even you! Submitting updated information about significant changes, saves our office from requesting those updates from you before issuing your Organic Certificate. Here are some of the areas most often in need of updated information ~ and why!

Labeling

Most handlers and processors are painfully aware of the need to have new labels reviewed prior to use. This step can save time and prevent costly mistakes. However, did you know that if handling, processing, or repacking a product for another company (a private label), you must submit those labels for your file as well? This is true even if you are contracting with a WSDA certified company. Your file, and certification, is not connected to any other operation. If your contractor provides a new organic label, submit that label for approval specifically for your operation and certification.

Post Harvest Materials, Processing Aids, and Other Non-Organic Additives

Once products are reviewed and approved, the ingredients and product formulations may never change. However, the manufacturer could change the

post harvest materials, processing aids and non-organic additives you use, and you may not even know it! Regularly check with your additives suppliers and manufactures to ensure that they haven't changed the formulation for the substances used with organic products. When substances are changed you need to ensure the new information is submitted for review and continued approval for use with organic products.

Organic System Plan

The Organic System Plan describes how you handle and process organic products and includes a list of all inputs you are planning to use. It is understood that you may need to modify this plan as the year progresses. Most changes to your system plans are easily reported during renewals and verified during inspections. Only significant changes that could affect the integrity of organic products need to be reported in between. For example: new inputs, lines, or equipment. If in doubt over whether or not to submit a change, ask yourself the following questions: Does this change alter the handling or processing of this product? Does this change alter the formulation or the final product? However, if still in doubt, CALL!

Your Organic Certificate is based on information you submit and inspection reports. As we move into the main inspection season for many processors and handlers, please keep in mind that knowledge is power; USDA accredits us to issue Organic Certificates, but we are powerless to do so unless you give us the proper information to make a knowledgeable and timely decision.

By Michelle Lucero, Organic Program Specialist

Sourcing Organic Ingredients

The following websites provide sources of organic ingredients:

- www.ota.com
- www.organic-bio.com
- www.allorganiclinks.com
- <http://buyersguide.ift.org>
- www.non-gmoreport.com
- www.naturalfoodnet.com
- www.preparedfoods.com
- <http://www.pugetsoundfresh.org/>
- <http://www.foodproductdesign.com/>
- <http://www.farmerchefconnection.org/>
- <http://www.ruralroots.org/farmfreshfood.asp>
- <http://www.organicconsumers.org/directories.cfm>
- http://www.growingwashington.org/local_farmers_coalition_rest.php

BRAND NAME MATERIAL LIST UPDATE

December 14, 2007

This list is to be used as an addendum to the Brand Name Material List . All materials listed below are approved as of December 14, 2007. You may access a complete updated Brand Name Materials List at the WSDA Organic

Food Program website: <http://agr.wa.gov/foodanimal/organic/default.htm>.

| Product Name | Company Name | Product Sub-Type | Product Type | Restrictions |
|--|---|---------------------|-----------------------------|---|
| AGGRAND Natural Kelp and Sulfate of Potash 0-0-8 | AMSOIL, Inc. | Blended Fertilizer | Fertilizer & Soil Amendment | None |
| AGGRENE Natural Fertilizer 4-3-3 | AGGRENE Division of AMSOIL, INC | Blended Fertilizer | Fertilizer & Soil Amendment | None |
| AGGRENE Natural Kelp and Sulfate of Potash 0-0-8 | AMSOIL, Inc. | Blended Fertilizer | Fertilizer & Soil Amendment | None |
| Archipelago Bat Guano LLC Natural Organic Phosphate Fertilizer | Archipelago Bat Guano LLC | Guano | Fertilizer & Soil Amendment | Must be used in compliance with NOP 205.203(c)(1) |
| Baicor Molybdenum 3.0% | Baicor, L.C. | Chelated Fertilizer | Fertilizer & Soil Amendment | Soil deficiency must be documented by testing |
| Benefox | Agroanic Products LLC | Microbial Product | Fertilizer & Soil Amendment | None |
| Biolizer GP | United Organic Products | Plant Extract | Fertilizer & Soil Amendment | None |
| Biolizer LC | United Organic Products | Liquid Fertilizer | Fertilizer & Soil Amendment | None |
| Creation Organics American Peat Moss | Wright Brothers Inv., Inc. dba Creations Organics | Peat Moss | Fertilizer & Soil Amendment | None |
| Creation Organics Garden Mix | Wright Brothers Inv., Inc. dba Creations Organics | Worm Castings | Fertilizer & Soil Amendment | Must be used in compliance with NOP 205.203(c)(1) |
| Creation Organics Potting Soil | Wright Brothers Inv., Inc. dba Creations Organics | Potting Soil | Fertilizer & Soil Amendment | Must be used in compliance with NOP 205.203(c)(1) |
| DeccoLustr® 550-ORG | DECCO | Fruit Wax | Processing Aid | Label Use Only |
| EcoMate Armicarb O | Helena Chemical Company | Fungicide | Disease & Pest Control | Label Use Only |
| Ethylene Control | Ethylene Control Inc. | Ethylene Control | Disease & Pest Control | Label Use Only |
| GreenMatch O Burndown Herbicide | Cutting Edge Formulations | Herbicide | Disease & Pest Control | Label Use Only |
| Husch & Husch Inc. Ultimate Organic Flower and Garden | Husch & Husch Inc. | Blended Fertilizer | Fertilizer & Soil Amendment | None |
| Husch & Husch Inc. Ultimate Organic Nitrogen | Husch & Husch Inc. | Nitrogen Fertilizer | Fertilizer & Soil Amendment | None |

Table continued from previous page.

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| Husch & Husch Inc. Ultimate Organic Turf | Husch & Husch Inc. | Blended Fertilizer | Fertilizer & Soil Amendment | None |
| Husch & Husch Inc. Ultimate Organic Turf II | Husch & Husch Inc. | Blended Fertilizer | Fertilizer & Soil Amendment | None |
| Kumulus DF | MicroFlo Company | Sulfur Product | Disease & Pest Control | Label Use Only |
| Omni Supreme Spray | Helena Chemical Company | Horticultural Oil | Disease & Pest Control | Label Use Only |
| Organic BioLink Boron Fertilizer 2-0-0 3% B | Westbridge Agricultural Products | Boron | Fertilizer & Soil Amendment | Soil deficiency must be documented by testing |
| Organic Growth Spurt | Soil Restoration, LLC | Soil Amendment | Fertilizer & Soil Amendment | Soil deficiency must be documented by testing |
| Organic Restoration | Soil Restoration, LLC | Soil Amendment | Fertilizer & Soil Amendment | Soil deficiency must be documented by testing |
| Pacific Gro Dry Fish Fertilizer | James R. Brackins dba Pacific Gro LLC | Fish Product | Fertilizer & Soil Amendment | None |
| Pound It | Tulare Ag Products | Soil Amendment | Fertilizer & Soil Amendment | None |
| Solution Grade KMS 0- 0-22 | Diamond K Gypsum | Potassium Magnesium Sulfate | Fertilizer & Soil Amendment | None |
| SuperGanic | Agroganic Products LLC | Blended Fertilizer | Fertilizer & Soil Amendment | None |
| Tiger Organic Agricultural Sulphur 90% | Tiger-Sul Products (Canada) Co. | Sulfur | Fertilizer & Soil Amendment | None |
| True "301" | True Organic Products, Inc. | Blended Fertilizer | Fertilizer & Soil Amendment | None |
| True "315" | True Organic Products, Inc. | Blended Fertilizer | Fertilizer & Soil Amendment | None |
| True "511" | True Organic Products, Inc. | Blended Fertilizer | Fertilizer & Soil Amendment | Use restricted to no more than 20% of the crops total nitrogen requirement [205.602 (g)] |
| True Bio-Builder | True Organic Products, Inc. | Blended Fertilizer | Fertilizer & Soil Amendment | None |
| True-Start | True Organic Products, Inc. | Blended Fertilizer | Fertilizer & Soil Amendment | None |
| Ultra Fines Sulfate of Potash | Diamond K Gypsum | Potassium Sulfate | Fertilizer & Soil Amendment | None |

NOTE: The National Organic Standards allow for inert ingredients in pesticide products if the material is listed on EPA List 4 Inerts of Minimal Concern, available on the EPA website . Due to recent clarification from the EPA, the OFP will be re-reviewing all pesticides that are currently registered on the Brand Name List. If a product contains an inert ingredient that is not on the EPA website, the OFP will notify the manufacturer that their product must be reformulated. ***If the manufacturer chooses not to reformulate with an allowed inert ingredient, their product will be removed from the Brand Name List.*** Please be sure to keep a close eye on the Brand Name List, as materials may come off the list.

National Organic Standards Board - Organic Seed Requirements May Change

Recommendations and decisions made by the National Organic Standards Board (NOSB) can have profound impacts on all segments of the organic food industry. The NOSB is authorized to decide which materials are allowed and prohibited in organic food production and handling. The NOSB also makes recommendations to the USDA National Organic Program concerning the National Organic Standards.

The board members include organic farmers, organic handlers, organic retailers, consumer representatives, environmentalists, scientists and certifiers. One current member, Jennifer Hall, is from Washington State. Jennifer is a former WSDA Organic Advisory Board member who works with the Chef's Collaborative.

All NOSB meetings are open, and public testimony is encouraged. The public comment section is always lively and demonstrates the open process of the US National Organic Standards. The USDA has agreed to hold one of the upcoming meetings in Seattle depending upon their budget situation. We encourage anyone interested in organic policy to attend the NOSB meetings or volunteer to serve on the board. The agenda and background papers for all NOSB meetings are available at the NOSB website <http://www.ams.usda.gov/nosb/meetings>.

The agenda for the November NOSB meeting included sunset materials, new materials, aquaculture standards, guidelines for the certification of organic research land, organic certificates, and grower groups. One significant item discussed was proposed guidance on commercial availability requirements (see "Guidelines for Commercial Availability", page 16.)

Commercial Availability Criteria

On October 1, 2007, the NOSB issued a document titled *Further Guidance on the Establishment of Commercial Availability Criteria*. Initially, these criteria applied to both organic seeds and to minor ingredients used in processed organic foods. The guidance was needed due to concerns that certification agencies were

not consistent in their interpretation of the requirements for the use of certified organic seeds and ingredients.

Many certifiers, including WSDA, were concerned that the proposed criteria would be burdensome for organic farmers who needed to demonstrate non-availability of organic seed. Due to the public comments received, including comments from WSDA, the NOSB recommended that the criteria apply **only** to minor ingredients used in processed organic foods. The NOSB will continue to work on guidance for commercial availability for organic seeds and plans to have a new proposal available for their spring 2008 meeting. It is likely that the upcoming NOSB recommendations will make it more difficult to use non-organic seeds.

Sources for organic seeds:

<http://csanr.wsu.edu/Organic/OrganicSeed.htm>
http://attra.ncat.org/attra-pub/altseed_search.php
<http://seeds.omri.org/index.php>

At the present time, producers must use organic seeds when available. The WSDA Organic Food Program requires that an organic grower source organic seeds from at least three organic seed suppliers, and that documentation is maintained to verify this effort. Documents can include seed catalogs or letters from seed suppliers stating that organic seeds were not available, or that the quantity was not sufficient. If organic seeds are available but they do not meet your quality standards, then producers must describe why the conventional version is of better quality.

The activities of the NOSB affect the entire organic community, and the Organic Food Program will continue to keep you informed.

*By Miles McEvoy, Organic Program Manager, and
Katherine Withey, Organic Certification Coordinator*

On-Farm Variety Trials

On-farm variety trials offer a sound farm management tool that can significantly minimize risk and increase agricultural success, as they help farmers select crop varieties best suited to their micro-climate, field conditions, and markets. In 2007, the Organic Food Program partnered with the Organic Seed Alliance (OSA) and the USDA Risk Management Agency to teach farmers how to conduct on-farm variety trials

Organic Seed Alliance worked with each of the partnering farmers to customize their variety trials to meet their needs. Growers identified which crops they wanted to trial and the traits that were most important to evaluate for that crop. For example, the owner of Ralph's Greenhouse, in Skagit County, chose to grow 12 varieties of Brussels Sprouts, because it was a new crop for the farm and he wanted to determine which varieties would perform best in his local conditions before investing in a field of

production. Brian Anderson, in Grant County, chose to trial yellow storage onions, because he wanted to find better organic varieties for bulk processing. Organic Seed Alliance provided support to the participating growers, including site visits, technical support, and on-site trainings at harvest time.

In 2007, OSA hosted six trainings in Oregon, Washington, Idaho and Alaska, for farmers and other agricultural professionals. Representatives from organic certification

“Seed is the story that is handed down from generation to generation.”

Matthew Dillon,
OSA Director of Advocacy and Outreach

agencies, including WSDA, attended the trainings to share information about organic seed regulations. The purpose of the trainings was to demonstrate how the grower would complete the final trial evaluations.

Trainings were based on a new OSA publication, *On-Farm Variety Trials: A Guide for Organic Vegetable, Herb and Flower Producers*. The guide provides complete instructions for conducting on-farm variety trials. Electronic copies of the publication are available at www.seedalliance.org.

Because they were tailored to each farmer's needs, the evaluations helped the growers make better decisions as to what varieties to grow. In addition, growers who conducted field trials maintained compliance with the organic standards by demonstrating an active effort to consider organically available varieties.

By Erin Mirrett, WSDA Organic Field Inspector, and Micaela Colley, OSA Farmer Outreach Coordinator



Participants in an on-farm variety trial are evaluating fennel varieties.

Livestock Standards Updated

As of December 13, 2007, the following materials have been added to 7 CFR 205.603, Synthetic Substances Allowed for Use in Organic Livestock Production:

Atropine (CAS # 51-55-8) – federal law restricts this drug to use by or on the lawful written or oral order of a licensed veterinarian, in full compliance with the AMDUCA and 21 CFR part 530 of the Food and Drug Administration regulations. Also for use under 7 CFR Part 205, the NOP requires:

- i. Use by or on the lawful written order of a licensed veterinarian, in full compliance with AMDUCA; and
- ii. A meat withdrawal period of at least 56 days after administering to livestock intended for slaughter; and a milk discard period of at least 12 days after administering to dairy animals

Butorphanol (CAS # 42408-82-2) - federal law restricts this drug to use by or on the lawful written or oral order of a licensed veterinarian, in full compliance with the AMDUCA and 21 CFR part 530 of the Food and Drug Administration regulations. Also for use under 7 CFR Part 205, the NOP requires:

- i. Use by or on the lawful written order of a licensed veterinarian, in full compliance with AMDUCA; and
- ii. A meat withdrawal period of at least 42 days after administering to livestock intended for slaughter; and a milk discard period of at least 8 days after administering to dairy animals

Flunixin (CAS # 54-31-9) – in accordance with approved labeling; except that for use under 7 CFR part 205, the NOP requires a withdrawal period of at least two-times that required by the FDA

Furosemide (CAS # 54-31-9) – in accordance with approved labeling; except that for use under 7 CFR part 205, the NOP requires a withdrawal period of at least two-times that required by the FDA

Magnesium Hydroxide (CAS # 1309-42-8) - federal law restricts this drug to use by or on the lawful written or oral order of a licensed veterinarian, in full compliance with the AMDUCA and 21 CFR part 530 of the Food and Drug Administration regulations. Also, for use under 7 CFR part 205, the NOP requires use by or on the lawful written order of a licensed veterinarian, in full compliance with the AMDUCA.

Peroxyacetic/Peracetic Acid (CAS # 79-21-0) – for sanitizing facility and processing equipment

Poloxalene (CAS #9003-11-6) – for use under 7 CFR part 205, the NOP requires that poloxalene only be used for the emergency treatment of bloat.

Tolazoline (CAS # 59-98-3) - federal law restricts this drug to use by or on the lawful written or oral order of a licensed veterinarian, in full compliance with the AMDUCA and 21 CFR part 530 of the Food and Drug Administration regulations. Also for use under 7 CFR Part 205, the NOP requires:

- i. Use by or on the lawful written order of a licensed veterinarian, in full compliance with the AMDUCA
- ii. Use only to reverse the effects of sedation and analgesia caused by Xylazine; and
- iii. A meat withdrawal period of at least 8 days after administering to livestock intended for slaughter; and a milk discard period of at least 4 days after administering to dairy animals.

(Continued on page 13)

(Continued from page 12)

Xyalzine (CAS # 7361-61-7) - federal law restricts this drug to use by or on the lawful written or oral order of a licensed veterinarian, in full compliance with the AMDUCA and 21 CFR part 530 of the Food and Drug Administration regulations. Also for use under 7 CFR Part 205, the NOP requires:

- i. Use by or on the lawful written order of a licensed veterinarian, in full compliance with the AMDUCA;
- ii. The existence of an emergency
- iii. A meat withdrawal of at least 8 days after administering to livestock intended for slaughter, and a milk discard period of at least 4 days after administering to dairy animals.

Excipients, only for use in the manufacture of drugs used to treat organic livestock when the excipient is: Identified by the FDA as Generally Recognized as Safe; Approved by the FDA as a food additive; or Included in the FDA review and approval of a New Animal Drug Application or New Drug Application. (note the following definition of excipients: any ingredient intentionally added to livestock medications but that do not exert therapeutic or diagnostic effects at the intended dosage, although they may act to improve product delivery (e.g. enhancing absorption or controlling release of drug substance). Examples include fillers, extenders, diluents, wetting agents, solvents, emulsifiers, preservatives, flavors, absorption enhancers, sustained-release matrices, and coloring agents.

Prohibited Materials

It is important to note that the following materials were NOT added to the allowed list of synthetic materials because they are not FDA approved to be authorized as medical treatment for livestock. The synthetic forms of the following substances continue to be **prohibited** for use in organic livestock production:

- Activated charcoal
- Calcium borogluconate
- Calcium propionate
(as a medical treatment for milk fever)
- Kaolin pectin
- Mineral oil
- Propylene glycol



The Organic Food Program is Hiring!

The WSDA Organic Food program certifies over 1,100 organic producers, processors and handlers. We experienced tremendous growth in 2007, and we anticipate continued growth in 2008. To keep pace with the growth in the organic industry, we need to hire additional staff to serve our customers.

Currently, we are seeking three full-time permanent Organic Program Specialists to evaluate organic producers, processors and handlers for compliance with National Organic Standards and foreign organic standards. There are two openings in Olympia, and the third may work out of their home. These positions will review applications, inspection reports, and other documents related to organic certification.

We also plan to hire an addition person to conduct organic inspections. That position will be advertised later this year. Please visit our website for more information.



**When the trees are bare,
it's a perfect time to complete your
renewal application paperwork!**



Neither rain, nor snow, nor gloom of night, will keep organic inspectors from their appointed rounds!

At left, organic inspector Mike Hackett conducts an inspection, while the farmer holds an umbrella to shield him and his computer from the rain.

Marketing Opportunities

The WSDA Small Farm & Direct Marketing Program works closely with buyers, farmers markets, and schools in an effort to increase marketing opportunities. We also partner with businesses and non-profits to develop needed infrastructure, such as livestock and poultry processing facilities. We assist farmers with innovative marketing ideas, and serve as resources regarding regulations or barriers to direct marketing. This past spring we visited a number of producers and attended several Farmers Markets. This enhanced our awareness of the issues facing small farms.

The Small Farm & Direct Marketing Program was created in 2001. Our mission is to increase the economic viability of small farms, build community vitality, and improve the environmental quality of the region, by facilitating direct marketing opportunities and addressing market barriers for small farms in Washington.

We frequently collaborate with Washington State University Small Farms Team and we even share a Small Farm Advisory Board with them. This advisory board meets four times a year and directs small farms programming for the state. There are six openings on the board for 2008. If you are interested, please contact Patrice Barrentine by January 30.

The Washington State Department of Agriculture has just released the Market Promotion and Trade Barrier Grant Program applications for the next fiscal year. We have approximately \$250,000 available for grant funding. If you are interested in applying for these funds, please visit the web site www.agr.wa.gov/Marketing, or call 360-902-1926. Proposals are due March 3, 2008.

In the past, Market Promotion Grants were awarded to the Cascade Harvest Coalition for five regional Farm-to-Table Workshops and the Seattle Chefs Collaborative for their Farmer Chef Connection Conference.

In addition to producing the free publications listed in the sidebar, we also present information at numerous conferences and workshops. You may contact us by phone or email. In the meantime, we encourage you to visit our web site <http://agr.wa.gov/Marketing/SmallFarm>.

By Patrice Barrentine, Direct Marketing Coordinator



Small Farm & Direct Marketing Program

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Free publications available from the Small Farms and Direct Marketing Program:

- The Handbook of Regulations for Direct Farm Marketing
- Farm-to-Cafeteria Connections: Marketing Opportunities for Small Farms in Washington State.
- The Washington State Farmers Market Manual

WSDA Organic Food Program

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“Nothing happens in living nature that is not in relation to the whole.”

Goethe

Proposed Guidelines for Commercial Availability

(see related story, page 10)

On October 1, 2007, the NOSB issued a document titled *Further Guidance on the Establishment of Commercial Availability Criteria*. Many certifiers, including WSDA, were concerned that the proposed criteria would be burdensome for organic farmers who needed to demonstrate non-availability of organic seed. The guidelines are listed below. For the full explanation, see *Organic Seed Requirements May Change*, on page 10.

1. Certification agencies will evaluate the operator's claim that there are no organic substitutes. This should include test data that the ingredient or seed does not meet the requirements for form, quality, quantity or equivalent variety necessary to the operation. Operators should expand their search for organic ingredients or seeds to the global market.
2. Documentation of the search for organic ingredients or seeds must be validated. Documentation needs to demonstrate the effort to contact credible suppliers and should also show the applicants efforts to do such research with proper lead time.
3. Certification agencies will notify all operations of resources to assist in locating organic ingredients or seeds six months prior to the need of the ingredient or seed. Certification agencies will evaluate requests for using non-organic seeds on an annual basis.
4. Certification agencies will keep a list of all ingredients or seeds that have been verified to be unavailable in an organic form. This list will be submitted to the NOP, where a master list will be compiled.
5. Each organic operator will include current information regarding commercial availability information in each organic system plan update. Requests to use non-organic seeds would have to be approved by certification agencies. This will include detailed documentation of how the operator has sourced organic ingredients or seeds.
6. All of the documentation required above will be audited in the certification agency's USDA audit.