



QUARTERLY REPORT

Treated Wood: Can I use it and when?

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Clarification on the allowed uses of treated wood is frequently sought by WSDA certified organic farmers. As you make plans for your 2006 production season, please keep the following in mind as it pertains to using treated wood.

The US National Organic Standards prohibit the use of treated wood for new installations and replacement purposes. The US National Organic Program provides clarification of this prohibition in the Questions and Answers section of their website. It says:

Q: Can wood treated with fungicides or other prohibited substances be used for fence posts, trellis systems, etc., in organic production? (Posted 10/16/02)

A: As provided in Section 205.206(f), the producer must not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock. The Preamble (Crop Production--Changes Based on Comments (7)) elaborates on 205.206(f) as follows:

“This provision prohibits the use of lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with an organic production site. We included this organic production site. We included this modification to clarify that the prohibition applies to lumber used in direct contact with organically produced and handled crops and livestock and **does not include uses, such as lumber for fence posts or building materials, that are isolated from production.** The prohibition applies to lumber used in crop production, such as the frames of a planting bed, and for raising live-

stock, such as the boards used to build a furrowing house.”

WSDA Organic Food Program clarification

The following describes the WSDA Organic Food Programs stances on the use of treated wood in the three primary areas we are asked about: trellis systems, raised beds, and greenhouse operations.

Trellis systems

- End posts in trellis systems are considered isolated from production as long as crops don't physically contact the end posts.

- End posts in trellis systems are considered isolated from production as long as crops don't physically contact the end posts.

- Metal, plastic and untreated wood posts

- Covering treated posts with plastic isn't adequate to prevent the treated posts from contacting the soil or crop over the lifetime of the posts. We have observed that the plastic degrades or gets torn during

installation and does not establish an adequate barrier.

- Setting treated posts in concrete may be adequate if it is done in a manner that prevents the treated posts from contacting the soil or crop.

Raised beds

Treated wood is not allowed in raised beds.

Greenhouse operations

Treated wood is prohibited in greenhouses where the wood is in contact with the soil used to produce organic crops. Treated wood may be used in greenhouses that produce organic crops on benches in flats, pots or other approved containers.

If you have additional questions about using treated wood on your organic farm, contact Miles McEvoy at (360) 902-1924 or email: mmcevoy@agr.wa.gov.



Email Quarterly Report article ideas to: rjamison@agr.wa.gov

Certified Handlers, Processors, and Retailers: 2006 Renewal Applications and Program Update

In January, the Organic Food Program will be mailing the 2006 Renewal Applications for Handlers, Processors, and Retail Operations that are certified by WSDA. Below is an overview of the required forms that must be submitted to our office:

Organic Renewal Application and Operator Agreement. The Renewal Application provides a space for you to confirm your contact and business information with our records. The Organic Operator Agreement is the legal binding document in which you affirm your commitment to complying with the National Organic Standards.

Organic System Plan Update. As you may recall, all of the WSDA Certified Operations were required to fill out a full Production System Plan and application paperwork in 2005 to ensure all information on file about your operation is current and complete. This year, our office will require a four-page update to the System Plan that was previously submitted! However, because your 2006 renewal is building off of your 2005 System Plan, we ask that you take the time to refer to your System Plan from last year and accurately communicate any changes you plan to make to your operation in regards to organic products. This will ensure that we have up-to-date information and eliminate the need for post inspection corrective actions.

Organic Product Summary Update form provides an opportunity for you to products, and ensure our records match or processed by your operation. The in-reflect the organic products you wish to the upcoming year, as well as noting any moved from your certification.

Organic Fee Forms and Sales Sum- on the gross sales or service fees received dar year. These forms allow us to verify tion was accurate and it provides information that can be used during an audit of your operation.



(not required for Retail Operations). This tell us about any changes in your certified the organic products currently being handled formation you provide on this form should have listed on your Organic Certificate for discontinued products that should be re-

mary. Organic Certification Fees are based by a certified operation in the previous calen- that the fee you paid for your annual certifica-

European Organic Verification Program. If you wish to participate in the European Organic Verification Program (EOVP) during 2006, you will be required to submit the EOVP Application and the EOVP System Plan *in addition to* the above required forms.

The National Organic Program requires all certified operations to renew their certification on an annual basis. To avoid being charged a late fee, and to avoid being sent a Notice of Noncompliance for failure to renew, all Handler, Processor, and Retailer Renewal Applications must be postmarked by **March 1, 2006**. *Please note that the new February 1 due date noted in the October Quarterly Report is only applicable to Producer, or Grower, Renewal Applications.*

2005 Inspections and Future Changes

One of the most common questions from Handlers, Processors, and Retailers during renewal time is - "My operation just received its annual inspection- why do I need to renew so soon afterwards?" It is true that many of the Handlers, Processors, and Retailers in our program receive their annual inspection in the fall and winter months. This overlap in inspections and renewal applications is due to the fact that the WSDA certification year does not follow the calendar year. Instead, the certification year is from March 1 – February 28. Therefore, the inspection you may have just received is actually your 2005 inspection. **In order to remain a certified operation you must renew your certification by March 1, even in the event that you just received your annual inspection.**

In an attempt to separate these activities, and to stagger the amount of paperwork received in our office every spring, WSDA Organic Food Program is working on a proposal to change the renewal date for Handlers, Processors, and Retailers to August 1. Our office will be providing further details about this proposal in future issues of the Quarterly Report or in informational letters that will be sent to all certified operations.

Finally, please contact Brenda Book [(360) 902-2090, email: bbook@agr.wa.gov] or Richard Carr [(360) 725-5492; email: rcarr@agr.wa.gov] regarding any questions you may have about the 2006 Renewal Processor and Handler Applications, new products you may want certified, or your annual inspection. We look forward to hearing from you and working with you in 2006! *By Brenda Book, Organic Program Specialist*

ATTRA: A Valuable Resource for Organic and Sustainable Farms

Looking for the latest in sustainable agriculture and organic farming news, events and funding opportunities? Look no further! ATTRA (National Sustainable Agriculture Information Service) was created by the National Center for Appropriate Technology (NCAT) to provide information to farmers, researchers, and others involved in commercial agriculture. ATTRA provides free in-depth publications and information on organic farming, alternative crop and livestock enterprises, innovative marketing, and highlights of local, regional, and federal sustainable ag activities.

Visit their website to sign up for ATTRA's free email newsletter, which provides current news and information to you on a weekly basis – including a forum to ask questions about organic and sustainable practices. The ATTRA website also provides a complete listing of the publications currently being offered– including guides on organic crops and livestock management, forms to help farmers with recordkeeping and preparing for an organic inspection, in addition to research on organic practices.

<http://attra.ncat.org/>

Calendar of Events

Fourth Organic Seed Growers Conference/Seed Biology Short Course

January 10, 11 and 12, 2006

McMenamins Edgefield in Troutdale, OR

This year's conference theme is Seed Quality – an integrated approach to genetics, seed production, post harvest treatment, conditioning, disease prevention and treatment. The Seed Biology Short Course will cover topics relating to seed quality such as flower induction and development, pollination biology, seed development, seed maturation and post-harvest seed physiology. Contact Organic Seed Alliance (360) 385-7192



Pasture Cross-Fencing: The Key to Successful Rotational Grazing

January 14, 2006

Maple Valley, WA

Contact: 206-205-3131 or email greta.cook@metrokc.gov

Artisan Cheese Making Short Course

January 24 – 25, 2006

Beecher's Handmade Cheese, 104 Pike Street #200, Seattle WA

Contact: Sylvia Kantor (206) 205-3131 or Sylvia.kantor@metrokc.gov

Peter Kixon, a Vermont small-scale cheesemaker, will be teaching the basics of artisan cheesemaking. This two-day workshop will allow participants to experience all aspects of the cheesemaking process, including an overview of the process and how different types of cheeses are made.

Seattle Farmer-Chef Connections Conference

February 6, 2006

Seattle, WA

Contact: Kelli Sanger, WSDA Small Farm & Direct Marketing Program 360-902-2057 or Debra Sohm, Ecotrust 503-467-0770.

A networking meeting for farmers and Seattle area buyers interested in making connections. Attendees: Farmers, Ranchers, Chefs, Retailers, and Caterers interested in making direct connections between one another.

Harvesting Clean Energy

February 27 – 28

Spokane, WA

Hear from experts and farmers with direct experience in wind power, ethanol and biodiesel, biopower and money-saving on-farm energy technologies. Learn how to assess feasibility, finance and market clean energy power and fuels. Contact info@harvestcleanenergy.org or (360) 352-1763 ext 104

American Society for Agricultural and Biological Engineers 2006 Session on Innovative Technologies for Organic and Sustainable Production

July 9 – 12, 2006

Portland, OR

At this meeting the technical session number BE-3 will be on 'innovative technologies for organic farming'. The purpose of this session is to enhance research done to increase the convenience of organic farming without compromising its principles.

Materials Corner with Katherine Withey



Can I use Nu Film P or Nu Film 17 for the 2006 cropping season?

Good question!! As of the printing of the January 2006 Quarterly Report, the use of Nu Film P or Nu Film 17 is not approved for organic food production. Over the past summer, we were hoping that a recent EPA review of the active ingredients of the materials would reclassify them onto the EPA List 4, allowing them for use under 205.601 (m)(1) which allows these inert ingredients for use in organic food production. This reclassification did not occur in the manner that we expected, and these specific active ingredients were not added to EPA List 4. Without this reclassification, Nu Film P and

Nu Film 17 do not meet the National Organic Standards and can not be used in organic food production. We encourage you to reference both the WSDA Brand Name Material List and www.OMRI.org for approved stickers/spreaders.

How do I know what materials are allowed for use on European Organic Verification Program (EOVP) certified crops?

Producers certified under the EOVP must only use materials approved for use under National Organic Standards. In addition, several materials that are allowed by the National Organic Program are prohibited for use on EOVP certified crops (IFOAM Appendix 1; IFOAM Appendix 2; EEC 2092/91, Annex II). Any product that contains one or more of the following materials may not be used EOVP certified crops: Sodium Nitrate; Vitamin D-3 for rodent control; Sulfur dioxide for rodent control; Vitamins B₁, C, E; Gibberellic Acid; Antibiotics (streptomycin, terramycin); Hydrogen peroxide; Ammonium soaps; Boric acid for structural pest control; Potassium

bicarbonate; Hydrated lime for disease control; peat for soil conditioning; and Lignosulfonates for floating tree fruit. Steer, cow, and other livestock manures may be used. Chicken manure may be used only if you can provide verification that it did not come from caged poultry.

Mineral fertilizers may be used only as a supplement to other practices implemented to ensure long-term fertility needs. You need to have verification available at your inspection to verify that you are implementing soil-building practices.

WSDA does not currently maintain a Brand Name List for EOVP compliant materials like we do for the NOP compliant materials due to regulatory constraints. However, we encourage all producers to call Rachael Jamison at (360) 902-1951 or Katherine Withey at (360) 902-1882 if you are unsure about a material or have any other questions pertaining to EOVP and/or materials.

Preparing For Your Organic Food Inspection

Producer renewal application packets were mailed on December 1. This means that organic food inspections are almost upon us. The following is information about the inspection process and tips on making the process as simple and smooth as possible.

Inspections take an average of 2-4 hours. This can vary depending on the size and complexity of your operation. The annual inspection is intended to verify that the Organic System Plan you submitted is being followed and that your farming and handling practices comply with National Organic Standards.

The inspection process includes a physical audit of your records and a tour of all aspects of your organic production. This may include visits to conventional sites if the inspector deems it necessary. Preparing for your inspection will also help expe-



dite the process and ensure that it goes smoothly. Some helpful hints:

- Review the Organic System Plan you submitted with your application. Make sure to note any changes that might have been made since it was submitted. Review the National Organic Standards.
- Ensure that the appropriate staff is available during the inspection, especially if they are the only person knowledgeable

about a specific aspect of production.

- Have your production records (material application records, material receipts, sales records, yield records, certificates, etc.) organized and ready to be reviewed. Make sure your records are complete and organized before the inspector arrives.

Your organic food inspection is an opportunity to demonstrate your operation's compliance with National Organic Standards. It is also your chance to talk with your inspector about any questions you may have about organic production. A little preparation will go a long way towards ensuring the process not only goes smoothly but also is enjoyable!

By Erin Mirrett, Organic Field Inspector

Report on the IFOAM World Congress: Adelaide, Australia

Miles McEvoy traveled to South Australia during the second half of September to attend the IFOAM World Congress and IFOAM General Assembly. The conference was held in Adelaide, South Australia. The trip was partially funded by the National Association of State Organic Programs (NASOP).

Australia's organic food industry is export oriented, focusing on the European and Japanese markets. Cereals and processed foods (e.g. muesli, flour, noodles, pasta and oils) are the primary exported products. The government provides accreditation for export markets.

The farm-gate value of the Australian organic industry is estimated at \$110 million US (2003). There is no regulatory oversight of the organic label in Australia. There are many competing identities and labels. Organic food has an image problem with consumers due to the divergent standards of the various organic certification agencies.

The following points were highlighted at the World Congress:

European governments continue to support conversion to organic farming. The European organic market is expanding although the lack of common market identity depresses the growth rate. Denmark is promoting the EU organic logo to support a common identity for organic food products. Denmark is also working to break down internal trade barriers within the EU that are mainly due to private organic certification agencies having divergent standards.

- Domestic organic markets are expanding in Brazil, India, and Uganda. Many of the organic products in these countries are certified through Participatory Guarantee Systems. Participatory Guarantee Systems utilize farmers and consumers as inspectors and include marketing and production assistance to farmers that participate in the system.
- Many producer groups are having difficulty accessing international markets due to accreditation requirements (e.g. USDA NOP, EU 2092/91, and IFOAM).
- The European Union is developing new procedures for evaluating inputs into organic agriculture systems. The new procedures are scheduled for adoption next year and should provide a more transparent process for adding materials to the European organic standards. More information is available at www.organicinputs.org
- One common theme in a number of conference presentations was the fear of weakened organic standards from the pressure of organic business interests. Some pointed to the confinement organic dairies in the US as evidence of this trend.

During the General Assembly, a new IFOAM World Board was elected. Gerald Hermann (Germany) is the new IFOAM President. Angela Caudle (USA) is the new Executive Director. It was voted to reorient the IFOAM Guarantee System (the IFOAM Guarantee System regulates the IFOAM Accreditation Program) to remove unnecessary obstacles to organic trade, develop equivalence with government regulations and provide greater accessibility for certification bodies to obtain IFOAM Accreditation. Additionally, IFOAM's membership fees were amended. The new fees will establish a lower minimum fee category and raise fees for medium sized organizations. After a friendly competition between Italy and Korea the General Assembly voted to have the 2008 World Congress in Modena, Italy. *By Miles McEvoy, Organic Program Manager*

Updated WSDA Direct Farm Marketing Book ("The Green Book) Now Available

With today's increasingly competitive food and agricultural markets, more farmers are turning to direct market sales to capture a higher percentage of the retail food dollar. To help farmers who want to enter this growing market, the Washington State Department of Agriculture (WSDA) has updated its guide to direct farm marketing.

Commonly called "The Green Book," for its green cover, the 116-page handbook provides regulatory and marketing advice for farmers interested in selling at farmers markets and roadside stands or directly to local consumers, grocery stores, cafeterias and restaurants.

"This is a valuable resource for farmers, county health departments, farmers market managers, agricultural professionals and anyone who wants to know the ins and outs of selling farm products direct to consumers," said Kelli Sanger, coordinator, Small Farm and Direct Marketing Program at WSDA.

The expanded version of *The Green Book* explains the basics of what growers need to know about food safety, health, business, labor and tax issues. There are sections on selling specific products, such as eggs, fish and shellfish, fruits and vegetables, honey, milk and dairy, and information on food stamps, nutrition programs, signage and labeling. It also covers direct marketing strategies that farmers can use to sell their products, such as selling to restaurants, at farmers markets, on-farm sales, Internet sales, and Community Supported Agriculture programs. An extensive list of publications and organizations related to the topics is included.

"Direct marketing is growing in popularity with farmers across the state, and consumers are responding with interest as well," Sanger said.

Annual sales at the 90 farmers markets across the state exceed \$22 million and the number of markets has increased by 61 percent since 1997.

To get a free copy of *The Green Book*, send your address via e-mail to smallfarms@agr.wa.gov, phone Kelli Sanger at (360) 902-2057, or download it from the Internet at <http://www.agr.wa.gov/Marketing/SmallFarm/greenbook.htm>.



Organic Food Program 2006: Staffing Changes and Updates

The WSDA Organic Food Program has seen some changes in staff and in contact information over the past year. Georgana Webster and Erin Mirrett were hired as organic field inspectors. Pamela Coleman has moved out of the office and into the field as an inspector. Richard Carr is no longer inspecting northwest Washington and is now back in the Olympia office. Mindy Ballinger was brought on to help with administrative work in the Olympia office.

Current contact information for Organic Food Program staff is as follows:

Christa Bemis (360) 902-1805 (Customer Service Specialist)

Mindy Ballinger (360) 902-1877 (Office Assistant)

Brenda Book (360) 902-2090 (Handler/Processor Certification Specialist)

Richard Carr (360) 725-5492 (Organic Certification Specialist)

Pamela Coleman (509) 989-0206 (Organic Field Inspector – East Central)

Jeff Collins (509) 682-8457 (Organic Field Inspector – North Central)

Les Eklund (360) 902-1891 (Organic Field Supervisor)

Mike Haskett (509) 225-2612 (Organic Field Inspector – South Central)

Rachael Jamison (360) 902-1951 (Producer Certification Specialist/Publications Coordinator)

Miles McEvoy (360) 902-1924 (Organic Program Manager)

Erin Mirrett (360) 607-3402 (Organic Field Inspector – Oregon & SW Washington)

John Morrison (208) 882-7322 (Organic Field Inspector - Eastern)

David Simpson (360) 202-3069 (Organic Field Inspector - Westside)

Jennifer Watson (360) 902-1885 (Organic Fee Specialist)

Georgana Webster (360) 988-4929 (Organic Field Inspector – Washington & Oregon Livestock)

Katherine Withey (360) 902-1882 (Livestock Certification Specialist/Materials Specialist)

By Mindy Ballinger, Organic Food Program Office Assistant

Apple Maggot Update

Apple maggot survey results from the 2005 field season showed a marked increase in both the number of flies caught and sites involved. In 2004, the survey efforts caught 235 flies at 152 sites while the 2005 season saw 872 flies trapped at 355 sites. Pupae were recovered from feral, infested fruit in both Chelan County and across the quarantine line in Yakima County, indicating that reproducing populations were present in a few sites.

2005 survey data causes concern for both the apple industry and the Washington State Department of Agriculture. The Apple Maggot Working Group will address questions about what to do next in order to protect Washington apple crops and access to markets. Organic growers saw their access to several California counties limited due to the new apple maggot catches and need to evaluate market regulations in order to develop business decisions.

Market access for apple crops is dependent on the customer's regulatory requirements. As these regulations vary between governments as well as organic versus other types crops, growers and packers may need to identify certification needs in a narrower fashion in the coming years. *By Brad White, WSDA*

Saving organic standards: Are they really under "sneak attack?"

by Trudy Bialic, Public Affairs Manager, PCC Natural Markets (Reprinted from PCC Natural Markets: Issues and Actions)

Confusing and emotionally charged statements are being widely disseminated on the Internet. They concern what some members of the organic community describe as a "sneak attack" to "weaken organic standards."

Our staff Nutrition Educator, Goldie Caughlan, has served as a consumer representative on the National Organic Standards Board for the past five years. Although she cannot comment officially on this issue, she has assisted us in understanding the issues and their implications to consumers. She has shared consumer concerns and their trust of the organic standards and the organic labels, as well as the perspectives of organic manufacturers and other producers and handlers.

This is a highly charged and divisive issue within the organic community. The conflict is the result of a lawsuit, **Harvey vs. Veneman**. Different people are interpreting a federal court ruling on the lawsuit differently, but all, we believe, are equally committed to keeping organic standards as strong or stronger than they have been. See Organic Trade Association's **Just the Facts. Questions and Answers about Restoring the Organic Regulations**.

When the court issued its ruling on the Harvey lawsuit in January, the choice for stakeholders was 1) to embrace it completely and accept some dramatic changes it demanded — for instance, that synthetics approved by the National Organic Standards Board, such as pectin, ascorbic acid and citric acid, would no longer be allowed in processing organic foods (although some approved synthetics would continue to be allowed in crop and livestock production), or, 2) return to the U.S. Congress and seek to have the original Organic Foods Production Act (OFPA) amended to bring it in line with the organic practices and standards established by a long-term public process since 1990, guided by the National Organic Standards Board (NOSB). The Organic Trade Association (OTA) voted unanimously to choose the latter route.

Different interpretations, common goals

It appears to us at PCC Natural Markets that OTA's move to propose and support a "rider" amendment to OFPA was reasonably based and that the specific changes appear to be wholly consistent with the continuation of strong national organic standards. PCC arrived at our decision to support the OTA position, after considering the specific language and the stated rationale (see OTA's Web site **Saving the Standards We All Worked So Hard To Get**).

Generally speaking we do not like rider amendments. Frequently they are stealth maneuvers made to affect legislation that



might not stand if scrutinized fairly and objectively. Rider amendments are tainted because they are undemocratic in their manner.

The National Cooperative Grocers Association (NCGA), of which PCC also is a member, is on record as opposed to the amendment. The NCGA is not alone in its perspective; it is joined by the Consumers Union and Organic Consumers Association (OCA). The OCA, in our opinion, has inaccurately represented the goals and aims of OTA's proposal, as well as the impact the proposed amendment would have on organic standards (see www.organicconsumers.org).

A close reading, however, of OTA's proposal and the OCA's position reveals that they are in agreement: 1) that some synthetics are necessary for processing but 2) that any synthetics should be carefully reviewed and approved by the NOSB, 3) that the NOSB must retain ultimate oversight authority over regulations, and 4) that no new powers or authorities should be granted to USDA managers or political appointees.

It is the position of PCC Natural Markets that the amendment presented by OTA to

restore OFPA to pre-Harvey status does not weaken organic standards. It does not remove from the NOSB any oversight authority it currently has. It does not give the USDA any powers or authority it does not currently have. (See **Restoring the National Organic Program**, Organic Trade Association.)

Perspective on process

Many citizens (perhaps understandably) have a mistrust of USDA and other large regulatory agencies. They find the use of rider amendments inherently distasteful, which we understand, and sense that any organization using this means of rule making is not to be trusted. There also is an increasing underlying suspicion among organic consumers that "big organic" is somehow trying to "weaken" the standards in general, and especially by this rider proposal.

There is much inflammatory language circulating on the Internet characterizing the OTA's decision and process in going to Capitol Hill as reflecting a takeover of OTA by big corporate interests. The fact is that virtually 50 percent of the OTA's members generate \$50,000 or less in annual sales (see www.ota.org). PCC Natural Markets, with \$89 million in sales last year, is among the very top few percent, but as a certified organic, consumer-owned cooperative, we certainly do not represent agribusiness.

PCC also wishes to note that the OTA invited any and all of its 1,500 members to participate in a series of conference calls to help decide the course of action after the court ruling. The OTA membership includes manufacturers, retailers, growers/farmers, ingredient suppliers, distributors, the personal care sector, farm suppliers and certifiers.

Even the farmer Harvey, who filed the lawsuit, is a member and he participated. More than one PCC staff member participated in these conference calls, providing the perspective of a consumer-owned retailer. There also were multiple opportunities for member stakeholders to

Continued on next page...

Saving organic standards: Are they really under "sneak attack?"

(continued from previous page)

participate in face-to-face meetings at Expo West (March), All Things Organic (May), and at Expo East (September).

It is also important to point out that while the OTA's amendment route has been characterized negatively in a variety of terms, some prominent critics of OTA reportedly also drafted and circulated their own proposed legislative amendments to OFPA on Capitol Hill.

It is PCC's view that the OTA-backed amendment would not give political appointees or others not on the NOSB the authority to add synthetic ingredients to organic production methods. The amendment does not give any administrative appointee any powers that he/she does not have now. And, it does not suddenly make way for synthetic ingredients.

Synthetics

While it seems only natural to reject the idea of any and all synthetics in organic production, the fact is that a small number of them — approved after careful review by the NOSB — have been allowed for lack of any organic version or substitute.

The current NOSB board, as well as all previous boards, have for many years reviewed and approved various synthetic materials petitioned by farmers, manufacturers and others for use in growing or processing. Synthetics appearing on the "National List" of NOSB-approved synthetics and disallowed natural substances automatically must be reconsidered under what's called a sunset review every five years or less.

The intent of the sunset review is that, as organic producers continue to improve organic practices and as research improves processing, natural substances hopefully could replace synthetics. The sunset review drives the research. The first part of the sunset review will be taken up at the November NOSB meeting for two full days.

The crux of the debate over synthetics has to do with the court's interpretation in January 2005 that OFPA, as currently worded, intends for foods labeled "Organic" and bearing the organic seal (95 percent organic or more) to not contain any synthetic materials. Only products labeled "Made with organic ingredients" (70 percent minimum organic ingredients), without the organic



seal, can use approved synthetics.

This is a change, and surely diminishes the appeal of many thousands of products to consumers. It eliminates incentive for producers to use any more than 70 percent organic ingredients. It also leaves a loophole or void for up to 30 percent non-organically grown ingredients, which could include toxic pesticides, etc. This would not serve consumers well and it reduces organic markets for farmers and other providers. (See *Harvey v. Veneman and its impact on the organic supply chain*, Organic Trade Association.)

It means that organically grown bananas could no longer be labeled with the organic seal, nor could organically grown, bagged lettuce. The reasons? Ethylene gas, one of the NOSB-approved synthetics, is used to help ripen organically grown bananas after long-distance transport. A very mild chlorine rinse is used to help keep organically bagged lettuce safe for consumers.

It must be noted that every other organic standard in the world (such as IFOAM, EU, CODEX and JAS) all allow the limited use of a few approved synthetic substances. Here in the U.S., there are 38 such synthetics, carefully reviewed and approved by the NOSB. Clearly, on one side of the debate these days is the view that the Harvey court ruling is a welcome opportunity to change the status quo. This would, however, represent a total departure and change from the 13-year process of the setting of USDA organic standards.

Harvey's impact on dairy

Another divisive ruling in the Harvey case included an end to what is termed the "one time only, whole herd exemption" for dairy cows. It changed a regulation passed years ago in response to consumers wanting to support organic dairy and to assist mostly small-scale farmers who felt they needed help in transitioning dairy herds to organic.

The pre-Harvey regulation allowed a farm to convert a whole dairy herd from conventional to organic within one year by feeding 80 percent organic and 20 percent non-organic feed, rather than the usual requirement of 100 percent organic called for in the regulations. Small family-scale dairy producers especially say they now feel economically disadvantaged by the court's reversal and many consumers agree, while many others believe the exemption never should have been granted originally.

A community view

The bottom line, for all of us in the organic community, is that more than a decade of NOSB work has been challenged by one individual, and one judge has ruled against much of what the NOSB has worked on all these years and upon which organic producers have had input and commented and ultimately relied. It is not unreasonable that the industry's trade association is attempting to rectify the situation for members.

This is a difficult and complex debate. Trust will need to be re-built regarding organic standards — however the issue is resolved. We know that if you are reading this you care about the organic and sustainable agricultural community. We all, truly, are on the same side as participants in the organic community.

The strong organic standards we have been operating under have served all of us in this community well and have provided a framework and incentive for the growth of organics across all sectors. We want you to know that we support the OTA's proposed amendment and do not see anything in it that would weaken organic standards.

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.



WSDA Receives USDA Risk Management Agency Grant for Washington Dairy Producers

WSDA recently received a USDA Risk Management Agency grant titled "Risk Mitigation Through Best Management Practice for Livestock Producers" in Washington State. This is a one year, \$150,000 grant that will target underserved dairy farmers and provide them with tools to assess and mediate risks associated with environmental stewardship, animal health and welfare, food safety, rural security and alternative marketing. This grant will target both new and existing producers of milk and milk products and will include all licensed dairies in Washington State.

The goals of this grant are to develop a manual addressing biosecurity, best management plans for antibiotic use, transition to organic certification as a marketing tool, and many other topics. In addition, a series of workshops will be given so that the dairy farmers can maximize the effectiveness of the manual and the information it contains. The manual is currently under development and the conferences are being scheduled, so look for updates in the next Quarterly Report. If you have further questions regarding the details of this grant, please contact Katherine Withey at (360) 902-1882 or kwithey@agr.wa.gov



Renewal application
due **FEBRUARY 1!**

*"Farming looks mighty easy when your plow is a pencil and you're a thousand miles away from the corn field."
- D. Eisenhower -*