

Organic News, Certification Updates, Member Profiles, and More!



CERTIFIED Organic

INSIDE LOOK

Organic Leading the Way to Safe Food

Certification Prepares Growers for
Future Food Safety Regulations



Food Safety Resources
Changes to Japanese Export System
GAP Survey Analysis

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Organic Leading the Way to Safe Food

"Organic certification contributes to keeping the food supply safe through its emphasis on detailed planning and recordkeeping, regulating inputs, encouraging sanitation practices, and cultivating biological diversity in the soil."

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New certified members

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Making History, Inventing the Future

Swanton Berry Farm founder Jim Cochran annually hosts a Focus Agriculture class visit to his farm stand outside of Davenport, California. Focus Agriculture is a local project that brings together community influencers who want to learn more about agriculture. A trip to Swanton and a visit with Jim offer these leaders a unique chance to ruminate on everything from the magnificent beauty of the Santa Cruz north coast to room décor (two stuffed blue Smurfs currently sit on the ledge above the doorway). They're served up a good reminder about what it is to lead - about making history and inventing the future.

The class gathers around Jim as he settles into the cushioned rattan armchair in the same room where U-pick visitors weigh their berries, place their payments directly in the cash drawer, and grab a cup of coffee for the road as they leave.

Jim's story of becoming the first U.S. organic strawberry farmer in today's marketplace reflects the business ups and downs that are so much a part of agriculture. He also shares his pride in selling healthy produce that is grown without synthetic pesticides and harvested by people who are paid fair wages and have a financial stake in the farm. And, he ponders on the shortcomings of the larger food system that delivers most of America's food. The U-Pick, farm stand, CSA, and local retail markets that are characteristic of Swanton Berry Farm aren't typical of how, as a nation, we get our food.

But conformity isn't the motto of organic, Swanton Berry Farm, or Jim Cochran. So, not surprisingly, Jim also devotes himself to working with others to reinvent what they see as a fundamentally unsustainable food system. With his colleague Larry Yee, in 2011 Jim co-founded and co-directs The Food Commons.

The Food Commons is a new food production and delivery system that recognizes food as a common asset. Commons infrastructure connects people within regions by prioritizing local food distribution over exports and imports. It values making healthy and sustainably produced food accessible and affordable to all. Food Commons seeks to capture wealth within communities as it brings us closer to the food we eat.

It's a big idea - just like organic strawberries.



Cathy Calfo
CCOF Executive Director

Issue Contributors

Organic Leading the Way to Safe Food, page 22



Jane Sooby has worked in sustainable and organic agricultural research since 1992. She attained a master's in agronomy at the University of Wyoming in 1994 and was a field technician at the High Plains Ag Lab in Sidney, Nebraska, for close to five years. She then returned to her home state of California to manage the Organic Farming Research Foundation's small grants program for 13 years. Sooby believes that organic farming offers practical solutions to many contemporary environmental problems, and advocates for organic agriculture in many ways. She is committed to making science accessible to a broad audience and believes that policy decisions related to agriculture should be firmly grounded in science. Sooby has written broadly on organic-related topics. Her calling is to work with farmers, scientists, and others to further organic agriculture.

Food Safety Resources, page 26



Jane Sooby, for Community Alliance with Family Farmers (CAFF)

Jim Slama, President, FamilyFarmed.org

Gwendolyn Wyard, Regulatory Director, Organic Standards & Food Safety, Organic Trade Association (OTA)

Jo Ann Baumgartner, Director, Wild Farm Alliance



Supreme Court Rules for Monsanto

The U.S. Supreme Court unanimously ruled in favor of Monsanto on May 13 guaranteeing the right to charge farmers royalties for any seeds resulting from its genetically engineered soybeans. 75-year-old Vernon Bowman of Indiana purchased a seed mix from a local grain elevator that he later planted. The mix included Roundup Ready soybean seeds. Bowman defended himself on the basis that he purchased the seeds legally from a grain elevator and the licensing agreement did not apply to him. Roundup Ready seeds can only be harvested once and cannot be saved or reused.

"If they then claim that I can't use that, they're forcing their patent on me," Bowman said to *Huffington Post* earlier this year. "No law was ever passed that said farmers can't go to the elevator and buy grain and use it, so to me they either forced their patent on me or they abandoned their patent by allowing it to be dumped in with non-Roundup grain."

The Supreme Court voted unanimously that Bowman had violated terms of Monsanto's patent, stating that he illegally made copies of Monsanto's invention. This decision comes on the heels of the recently passed Consolidated and Further Continuing Appropriations Act of 2013, which includes a disappointing rider allowing legal immunity to biotech companies that research and produce genetically engineered foods. Essentially, if there is a court challenge or injunction on the selling of genetically engineered foods, the USDA must allow the biotech firm to continue selling the GE crop. The provision was anonymously added to the budget bill and passed without much notice from Congress.

Organic is Better, According to Fruit Flies

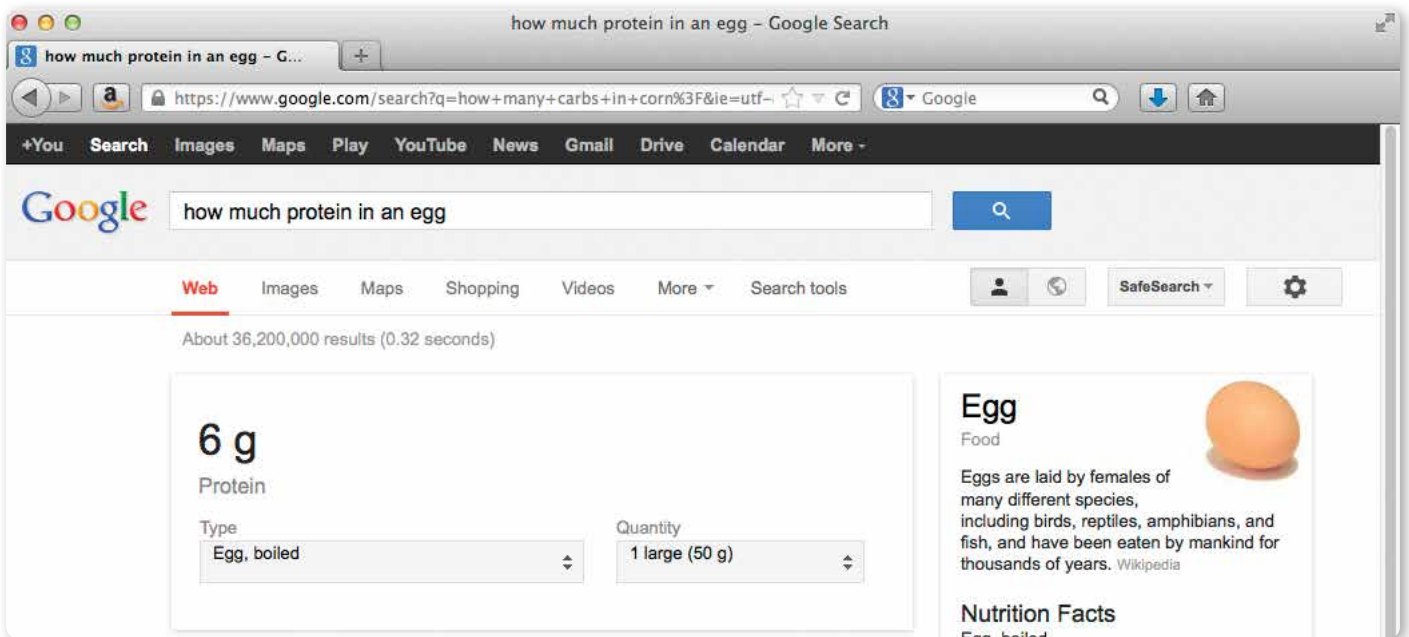
Sixteen-year-old Ria Chhabra, inspired by her parents' debate over the value of organic foods, created her science fair project on the Vitamin C content of organic foods three years ago. Encouraged by the results of the initial project, the proactive teen wanted to continue research, and concluded that fruit fly observation would be an optimal model for studying the effects of organic on overall health. Chhabra contacted a number of professors who run fly laboratories and received a response from Johannes Bauer at Southern Methodist University in Dallas, allowing her to continue her work in a lab typically used by graduate students. She has since received top honors in a national science competition, publication of her research, and laboratory privileges at Southern Methodist University in Dallas for her work on fruit flies and organic food.

Titled "Organically Grown Food Provides Benefits to *Drosophila melanogaster*," Chhabra's research observed fruit flies and the effects of conventional and organic diets on their health. In terms of longevity, fertility, and stress resistance, fruit flies who dined on organic potatoes and bananas were healthier than flies feeding on conventionally grown foods. These results, while not directly related to human health, show promise for future studies on the health benefits of an organic diet. Future research could evaluate the factors contributing to the health of the flies, including higher nutrient content in organic foods or the effects of pesticide and fungicide residues from conventional foods. Chhabra has continued to work in Bauer's lab, including research on Type 2 diabetes and alternative remedies in fruit flies.

The debate has been settled in Chhabra's household - all of the family's fresh produce is organic.

Vermont House of Reps Passes GE Food Labeling Bill

In a vote of 107 to 37, the Vermont House of Representatives passed H-112 - legislation requiring statewide labeling of genetically engineered foods - on May 10. The bill, which has passed to the state Senate, will be evaluated again in January 2014. If passed, Vermont will become the first state in the nation to require GE food labeling. The measure would not go into effect for two years and exempts meat, milk, and eggs from animals fed or treated with GE materials.



A recent attempt to introduce federal legislation that would require labeling of GE foods failed, and a farm bill amendment by Senator Bernie Sanders of Vermont that would allow individual states to require labeling was rejected in the Senate 71 to 27. A number of other states, including Connecticut and Maine, have introduced legislation to mandate GMO labeling. We expect further developments in the next few months.

CCOF strongly supported California Proposition 37, which failed to pass in November 2012. We oppose the commercialization and use of genetically engineered crops because they pose a threat to organic growers and consumers. Sixty four countries, including China, Russia, Brazil, India, EU, and Japan, already have GMO labeling regulations. We believe that organic farmers shouldn't have to carry the burden of trying to protect their crops from being cross-pollinated with genetically engineered varieties. Consumers have the right to know what they are eating - choosing certified organic is the best option for avoiding GMO foods.

CCOF stands with the Just Label It! campaign. Get involved and contact the FDA at www.justlabelit.org.

Growing Consumer Trust in Organic Foods

Data from the Organic Trade Association's 2013 *U.S. Families' Organic Attitudes and Beliefs* survey indicates that trust in organic foods is increasing, with 81% of U.S. families having at least occasionally purchased organic foods in the last year. Released in early April, the survey of 1,239 consumers shows that fresh produce remains the most popular organic choice for shoppers. In fact, 97% of organic consumers purchased organic fruits or vegetables in the last six months. Organic breads, grains, dairy, and packaged foods were also frequently purchased. In addition, the survey found that organic consumers spend more at stores and shop more often - an

important consideration for retailers hoping to secure shoppers.

Concern over their family's health remains the top consumer reason for buying organic. Other reasons include avoiding pesticides, fertilizers, antibiotics, growth hormones, and GMOs. "More and more parents choose organic foods primarily because of their desire to provide healthful options for their children," said Christine Bushway, OTA CEO and Executive Director, in a press release.

Promisingly, 42% of respondents stated that their trust in organic has increased in the last year, a 10% improvement over the 2012 survey. "Consumer trust is on the upswing for organic as the gold standard when seeking to avoid toxic and persistent pesticides, antibiotics, synthetic hormones, genetically engineered ingredients, and additives," Bushway added.

The report also includes a profile of organic buyers; trends in organic purchasing habits; attitudes about organic, natural, and buying local; and media habits of buyers and non-buyers. Visit www.ota.com to learn more.

Google Adds Nutrition Info to Searches

Google has added nutrition information for over 1,000 fruits, vegetables, meats, and meals into its search results. The feature expands on Google's Knowledge Graph, which makes certain search information more easily accessible. You can hear the answer to your specific question, see nutrition information under an expansion, and switch to related foods or serving sizes, according to Google product manager Ilya Mezheritsky, in a blog post. Mezheritsky's post claims you can ask questions like "how many carbs in corn?" or "What nutrients are in breadfruit?" and instantly receive clean, simple information. Google plans to add more features, foods, and languages over time. Get searching at www.google.com.

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The mission of the Organic Trade Association is to promote and protect organic trade to benefit the environment, farmers, the public and the economy.

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ANOTHER  PRODUCT



Masumoto Family Farm's First Cookbook

CCOF-certified Masumoto Family Farm has crafted a cookbook entitled *The Perfect Peach: Recipes and Stories from the Masumoto Family Farm*, released June 11. Marcy, Nikiko, and David Mas Masumoto offer tales from their four-generation certified organic farm as well as a collection of delicious and intriguing recipes centered on their heirloom peaches. *The Perfect Peach* contains 50 sweet and savory dishes and beautiful photographs from the orchard, giving readers a close look at the Masumotos' life on the farm. Order the book now and prepare yourself to make peach cobbler, chutney, slow-cooked pork tacos, grilled peaches, or stuffed French toast. In addition, the family has included directions for drying, canning, freezing, or jamming the summer peach harvest. *The Perfect Peach* will be available June 11 from Ten Speed Press, with a forward from Chef Rick Bayless. Learn more about Masumoto Family Farm and their new cookbook at www.masumoto.com.

Two Boisset Wineries go 100% Solar

Boisset Family Estates, proprietor of CCOF-certified members DeLoach Vineyards and Raymond Vineyards, has committed to converting the two vineyards to 100% solar energy by the end of the summer. Boisset began implementing organic and biodynamic farming practices at the Raymond Vineyards winery after purchasing it in August 2009; solar installation started at DeLoach and Raymond last winter.

"The evolution of our California wineries to 100 percent renewable energy extends a long-held family commitment to stewardship of our lands and our irreplaceable terroir. We farm not for this generation, but for the generations to follow. We listen to the rhythms of nature in pursuit of authentic wines that respect the living life of the vineyards, now and for the future," said Jean-Charles Boisset, president of Boisset Family Estates, in a press release.

Boisset's enthusiasm for organic and biodynamic practices extends beyond the bottle to the land - visitors to Raymond Vineyards' Napa Valley location can engage in an interactive tour of biodynamic farming through guided audio, exhibits, and seminars. Ten percent of the estate is dedicated to biodiversity. Learn about the tour at www.theaterofnature.com. The completion of the solar project will make Raymond Vineyards the largest 100% solar-powered winery in Napa, generating over 1 million kWh per year and annually offsetting 758 tons of greenhouse gas emissions. The DeLoach system will produce over 300,000 kWh and eliminate 232 tons of greenhouse gas emissions each year. Visit www.boissetfamilyestates.com for more details.

Whole Foods Market Builds First Commercial-Scale Rooftop Greenhouse

Certified member Whole Foods Market will complete a 20,000 square-foot greenhouse on the roof of its Gowanus, Brooklyn store later this fall. Intended to supply the grocer's New York City stores, the greenhouse will reduce emissions from long distance food transport while offering locally grown, healthy options for customers. Operating partner Gotham Greens will grow produce free of pesticides year-round on the rooftop greenhouse that will include advanced irrigation systems and materials to reduce energy consumption.



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Corn, soy, canola, alfalfa, sugar beets, cotton, and summer squash are some foods that are likely to be genetically engineered and present in many products.

“Talk about local! This project takes the discussion from food miles to food footsteps,” said Viraj Puri, Gotham Greens co-founder, in a press release. “Our greenhouse will provide Whole Foods Market shoppers with access to the freshest, most delicious leafy greens, herbs and tomatoes, year-round that will be grown right above the store’s produce department. We’re thrilled with this partnership and to be part of the growing national movement of farmers and food producers committed to providing consumers with high quality, responsibly produced food.”

The Gowanus greenhouse will be operational in time for the store’s November opening and will offer consumers and students from local schools the opportunity to learn about the environment, farming, and greenhouse production. To watch a video about Gotham Greens and this greenhouse initiative, visit darkrye.com/content/gotham-greens-feature.

The FruitGuys Make Cubicle Delivery Easy

Newly certified member The FruitGuys believes that “making wellness available at work, at home, at schools, and as unique weekly gifts is key to making America healthy again.” Dishing out organic produce to homes, schools, and offices in sustainable packaging is the foundation of The FruitGuys’ mission. After pioneering the “fruit at work” concept in San Francisco, the FruitGuys now have regional distribution hubs across the United States served by local, small family farms.

The FruitGuys do much more than deliver organic produce boxes. Their GoodWorks program provides weekly donations to food pantries across the country, amounting to more than 300,000 pounds of fresh produce each year. They also run the Farm Steward program with a mission to “promote sustainable

farming practices and promote economic stability for family farms.” Farm Steward programs include owl boxes, bat boxes, bee hives, and microloans and grants for small producers.

Ordering is easy, with many delivery options available. Visit www.fruitguys.com for ordering information and details about their numerous assistance programs.

New Leaf Community Markets Commits to GMO Labeling

New Leaf Community Markets, a chain of seven stores that includes the CCOF-certified Felton, California, store, has said that all products on their shelves containing genetically engineered ingredients will be labeled by 2018. New Leaf follows CCOF-certified member Whole Foods Market, the first supermarket chain to call for GMO labels from its suppliers by 2018. The company currently seeks non-GMO foods to replace those products on their shelves that contain GMO ingredients.

“Over the past several years, [GMOs] have become more prominent in our food supply, threatening the quality of food we offer our customers, as well as their health,” New Leaf said on its website.

Corn, soy, canola, alfalfa, sugar beets, cotton, and summer squash are some foods that are likely to be genetically engineered and present in many products. The market chain hopes to replace many of their GMO products with brands carrying the Non-GMO Project seal. Whole Foods already carries 3,300 products from 250 Non-GMO Project-verified brands, including its 365 Everyday Value line.

CCOF "Likes"



Member News Meets Social Networking



J R Organics CSA Farm via [Facebook](#): "Bugs - Good and Bad. If you're finding little brown bugs on your lettuce and broccoli, they are aphids. Aphids are harmless if eaten and some people just view them as extra protein. But if you'd rather bypass the extra nutrients, do a water/ white vinegar dip and rinse. Aphids are sticky and will not rinse off easily. The vinegar releases them so they will wash off under running water. Joe has just released thousands of lady bugs whose favorite meal are aphids. We should see an improvement over the next few weeks."

What a great tip for farmers and gardeners alike, even those with houseplants! Thanks for the tip!



Frog Hollow Farm's CSA via [Facebook](#): "One of our new mom CSA members just told us how much she loves using the fruit from her Frog Hollow Farm CSA box to make baby food. Brilliant idea huh?"

CSA members are a reliable way of learning how customers are eating your produce. Use social media or your newsletter to share these good ideas with your community.



Sierra Cascade Blueberry Farm via [Facebook](#): "Start dusting off your best blueberry recipes - harvest starts SOON!!!"

Is your crop ready to harvest? Alert your supporters through social media so they know what to add to their farmers' market shopping list.



Dirty Girl Produce via [Facebook](#): "Crunchy little radish salad for kids (and adults). Simple, tasty recipe and cute kids in the latest blog post! www.dirtgirlcookbook.blogspot.com."

We love Dirty Girl Produce's blog, which offers recipes and stories about eating and teaching children to love good food. Do you have a blog? Make sure you fill it with good content and share the link with your fans.



Bennett's Honey Farm via [Facebook](#): "If you're a honey lover, you should know that one honeybee will only produce about a teaspoon of honey during its life. If you're the type of person who goes through several jars of honey, you have a lot of bees to thank."

Consumers often aren't aware of how much effort goes into the food they enjoy. Sharing facts like this help them appreciate the hard work - in this case, the hardworking honey bee.



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Ag Delegation to China Informs on Challenges and Opportunities

China is the world's largest producer of agricultural goods. However, U.S. agricultural exports to China, the world's most populous nation, exceed imports by better than 7:1. Agriculture is a bright spot for the United States in its trade relationship with China, but the relationship is fraught with friction.

During 2012, the United States shipped nearly \$30 billion in agricultural exports to China, while China sent about \$4 billion to the states.

Demand for U.S. goods in China is fueled by tremendous economic growth of about 10% annually over the past decade, and tremendous migration from rural to urban areas. As economic growth levels off and slows slightly, China seeks to address impacts of personal income growth and urbanization that have resulted in a deep gap between rich and poor and emerging westernized tastes among China's well-heeled urban middle class. These trends - combined with continuing food safety scandals within China - fuel growing demand for safer food products from the United States and other parts of the world.

These trends have also piqued Chinese consumer demand for healthier, organically produced food, and spurred Chinese government attention toward the Chinese Organic Standard. The standard, in development for some time, became strictly

enforced in March of this year and now essentially blocks the import of most U.S. organic products to China. New Chinese rules require that all imported organic products be certified by a Chinese-accredited certifier. There are numerous barriers to Chinese accreditation for U.S. and other foreign certifiers, including location of offices in China and capitalization and language requirements.

It is against this backdrop that CCOF Executive Director Cathy Calfo was invited to join California Governor Jerry Brown's trade mission to China in April. The goal of the mission was to expand U.S.-China trade and investment opportunities. China and the United States also share interests in tackling China's notorious air quality challenges: according to the governor's office, over 25% of particulate matter found in California's air comes from China.

CDFA Secretary Karen Ross led 18 members of the governor's delegation in a series of tours and meetings that focused specifically on trade and agricultural issues. China is the third largest market for California agricultural goods, accounting for \$1.7 billion in 2012. A number of CCOF-certified operations participated in the trade mission.

Agricultural delegation activities included briefings by U.S. Embassy and Agricultural Trade Office staff in Beijing, Shanghai, and Guangzhou; a meeting with the president of the Chinese Chamber of Commerce for Import and Export of Foodstuffs; a tour of quarantine and inspection facilities, the major Yangshan Port outside of Shanghai, and a nearby cold storage warehouse; as well as a visit to the Jianguang Fruit Wholesale Market in Guangzhou, which employs more than 40,000 people! In each of the major cities, the agricultural delegation met with local food distributors and visited a retail grocery market. In China, the dominant trend in urban food distribution is toward internet delivery services and high-end supermarkets that feature organic products.

Cathy had the opportunity to meet with the agency that oversees organic certification, and a couple of Chinese certifiers, including COFCC, which certifies Organic Valley milk products to the Chinese Organic Standard. Organic Valley is one of the few U.S. organic companies that successfully accessed the Chinese market through certification to the Chinese Organic Standard. There is strong demand for organic milk in China and grocery store shelves are lined with organic milk products from Europe and the United States.

U.S. organic products were also seen on the shelves of Chinese markets. However, the word "organic," certifier information, and the USDA logo were usually blacked out on the labels.

Big takeaways from the trip fell into two large buckets. First, China is big and faces enormous challenges as it seeks to

In Chinese markets, the word “organic,” certifier information, and the USDA logo were usually blacked out on the U.S. organic products.



feed and provide for its population of about 1.3 billion - more than four times that of the United States in roughly the same geographic area. Food safety, air pollution, potential disease outbreaks, and wealth disparity are issues that top the new Chinese government's agenda. Second, for American businesses, China presents both enormous opportunity and risk. For the agricultural sector, the Foreign Agricultural Service and American Trade Offices are strong partners for U.S. businesses and energetically assist in assessing risk, accessing the Chinese market, and promoting U.S. products.

Benefits of the governor's trade mission for CCOF members are many. The trip paid CCOF members their dues by recognizing organic as an important part of California's agricultural sector and overall economy. It also provided us with a better understanding of the Chinese marketplace and organic regulatory framework, and stronger relationships with USDA's Foreign Agricultural Service staff stationed abroad to support U.S. trade.

For many CCOF members, the current regulatory burden and risk of Chinese certification will outweigh opportunities, especially given continuing strong growth of our domestic urban market. But for others, the opportunity will beckon.

Education Program in Full Swing this Spring

CCOF's education program was full of activity in the first quarter of 2013. In February, we offered our *Marketing 101* training translated in Spanish for students at the Agriculture and Land-Based Training Association (ALBA). We also hosted the webinar for members and the general public again in March.

Later in the month, we presented our *Farmers' Market Best Practices Guidelines* to a group of market managers at the CA Small Farm Conference. Feedback was positive and supportive, and market managers look forward to future collaboration. We offered managers an opportunity to participate in efforts to help consumers differentiate between organic and conventional. For the second year in a row, we developed a promotional postcard to educate consumers on the meaning of "certified organic" and the value of organic products. The "Why Buy Certified Organic?" postcard also includes an attached "Buy Certified Organic" magnet that will remind consumers

to be conscious in their food purchasing. We made these cards for CCOF members and market managers to hand out at their farmers' markets. The complimentary cards were distributed to 40 CCOF members and 25 farmers' market managers throughout California. These informative postcards were made available through generous sponsorship from Organic Valley. We hope to create tools like this on an annual basis. Let us know what type of information would help grow your business by sending feedback to marketing@ccof.org.

We held our popular *Organic Labeling* webinar on May 9, moderated by Jody Biergiel, CCOF Director of Handler Certification and Certification Business Operations. Attendees were supplied with our *Develop Compliant Organic Labels* guide, a useful tool for labeling standards. Visit our website to download your copy today.

CCOF continues to partner with UCSC's Center for Agroecology and Sustainable Food Systems (CASFS) through a Beginning Farmer Rancher Development Program grant. This grant brings \$37,402 in funding over the next three years and strengthens our relationships with partner organizations including CASFS, Community Alliance with Family Farmers (CAFF), and the Ecological Farming Association to provide educational trainings for beginning farmers on the California Central Coast.

Sonoma Open Forum Town Hall Meeting a Great Success

We had a great time meeting with clients and non-clients alike at our open forum town hall meeting on May 2 at the historic Buena Vista Winery near downtown Sonoma. The beautiful weather and scenery made a perfect day to converse about organic certification, grape growing, and wine production, and enjoy a brief tour and tasting.

Attendees were greeted by CCOF staff before heading into Buena Vista's Press House, built in 1862, for the meeting. Eric Pooler, vineyard manager for Boisset Family Estates, gave a warm welcome to participants to get the discussion started. Val Dolcini, USDA Farm Services Agency State Executive Director, introduced the agency's excellent Microloan program and spoke on how it could benefit certified producers. Equipment,



labor, seeds, feed, and other operating costs can be covered by these seven-year loans, with no minimum loan amount and a maximum of \$35,000. Val encouraged interested participants to contact him for more information and to get started.

CCOF Chief Certification Officer Jake Lewin then provided certification program updates, highlighting MyCCOF: Supplier Management, our newest tool that allows subscribers to track certifications and download certificates of their CCOF-certified suppliers. An open forum followed with meeting attendees providing suggestions on how to improve our services and be more involved, and asking questions about online services, state department paperwork and regulations, and inspections.

Attendees headed back outdoors and were greeted by the Count of Buena Vista, who led us on a short tour and provided history and significance of the winery. CCOF staff and meeting participants enjoyed networking, cheese & crackers, and a delightful tasting of Buena Vista's wines. All clients in attendance received a complimentary "CCOF-Certified Organic" sign for their operation. CCOF staff were also on-hand to provide one-on-one demonstrations of MyCCOF and MyCCOF: Supplier Management. Thanks to all who attended!

LA Wholesale Tour - Sunny & Successful!


In April, CCOF expanded our Wholesale Market Tour to Southern California. We hosted our first Los Angeles tour with 25 participants. Attendees walked the docks of the Los Angeles

Wholesale Market, a landmark in the produce industry, and gathered at the former LA Wholesale Produce Market. There, the loading docks at horse-and-buggy height (versus semi-truck height) were evidence of the growth the market has experienced through the years. Now, the market is a hub for much of California's fresh fruit and vegetables. David Weinstein from Heath & Lejeune pointed out good examples of compliant organic wholesale labels and newer, reusable wholesale produce boxes. The audience also discussed poorly stacked and assembled produce boxes that may compromise the quality of the end product.

From there, the tour moved on to Better Life Organic Produce, led by Sales Manager Nikki Nagel. Nagel discussed how organic has changed since the implementation of the national standards; Better Life has to keep track of organic certificates for all the operations they buy from but consumer confidence in organic is higher than ever before. After the tour, participants were excited to have the opportunity to meet and exchange contact information with the Better Life produce buyers.


Finally, the tour visited the headquarters of Heath & Lejeune and discussed cold chain management and preserving the integrity of organic produce. Participants learned that the new facility's extra-high ceilings help keep produce at the right temperature where in other warehouses, they might be near the ceiling, which is warmer. After the tour, the attendees enjoyed a delicious lunch in the warm Southern California sunshine. We'll continue to offer future tours like these, so check the CCOF education page often at www.ccof.org/education.

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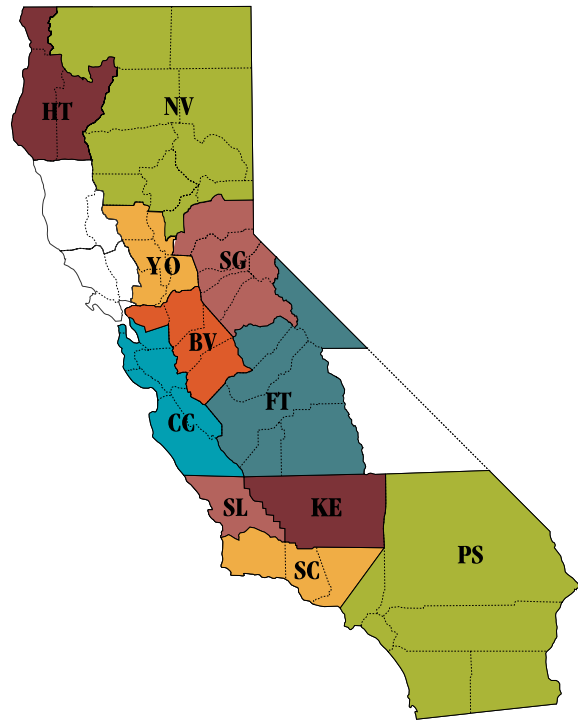
Get Involved with Your Chapter!

Big Valley (BV)

The Big Valley chapter held their first meeting of 2013 in Modesto, California, at the new Concetta restaurant, which highlights locally grown and organic products. The meeting agenda was packed with useful information for CCOF members. After an antipasto platter and the first course of pizza, served family style, Brise Tencer, CCOF Director of Policy and Programs, and Christine Coltellaro, Chapter Outreach Coordinator, began the meeting with a presentation on CCOF updates and policy and advocacy efforts. Brise was on hand to discuss the proposed food safety legislation, both during and after her presentation. CalCAN Executive Director Renata Brillinger gave an informative presentation on their policy efforts. Presentations concluded with Melanie Cheng, founder of Farms Reach, an online resource providing “practical tools, services, and connections so farmers can learn from each other and optimize their operations.” The meeting finished with a formal introduction of new Big Valley board representative, Brad Samuelson.

Sierra Gold (SG)

On March 24, an atypical Sunday, the farm advisors office in Placerville, California, transformed into a lively meeting space for the Sierra Gold chapter. Home-cooked lasagna, salad, bread, and desserts lined the walls of the office. The meeting began with an introduction from Chapter President Randy Hansen and a call for nominees to chapter offices. The recent SG chapter meeting successfully reached out to the community of organic producers, processors, and retailers, and those on the fence about getting certified. Attending the meeting from the CCOF home office was Christine Coltellaro, Chapter Outreach Coordinator; Becky Witty, Certification Service Specialist for SG chapter; and Executive Director Cathy Calfo, who provided recent CCOF updates. Adding to the flavor of the meeting was a discussion about in-store organic labeling and the market value of certified organic in the marketplace with community members Melissa Clarke and Justin Barbeau from the Placerville Natural Food Co-op, and David Benson from the Briar Patch Co-op. The full agenda finished with a robust raffle populated with gracious donations from Placerville Natural Foods Co-op, Placerville Fruit Growers’ Association, Goodness Orchard, Mad Dog Mesa Olive Oil, and CCOF. Almost every attendee went home with a prize.



Fresno-Tulare (FT)

As follow-up from their previous meeting, the focus of Fresno-Tulare’s second meeting of 2013 focused on the future of the Student Organic Farm and Organic Program at Fresno State. The chapter has dedicated time and resources to the farm and invited Dean Boyer from the Jordan College of Agriculture, Sciences & Technology to attend their meeting and discuss the fate of the university’s organic program. Encouraged by the dean, the next FT chapter meeting will include faculty from the school’s plant science department. This meeting will happen in August.

Chapter member Dr. Mint Paskadee secured a grant in 2008 that enabled the Student Organic Farm to operate thus far, and she is now stepping aside from the project. She and Calliope Correia have shown tremendous dedication and accomplishment at the farm in the last five years. Calliope manages the horticulture department, which produces and sells certified organic plants for the home garden.

Let the CCOF community know what your chapter is doing!

Write to programs@ccof.org and we will publish your chapter update in the next edition of *Certified Organic*.

Thank you to this issue’s contributors: Randy Hansen (SG), Nancyjo Riekse, and Cynthia Ortegon.



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Leading the Way to Safe Food

Written by Jane Sooby

Food Safety and the Coming Food Safety Rules

Food safety has been an issue for humans since we first started eating and needed a way to store food without spoilage. In modern times, the discovery of germs that carry disease, public sanitation, and the invention of canning and mechanical refrigeration have contributed valuable tools to the food safety effort. However, the industrialized, centralized food system in the United States continues to create conditions that cause foodborne disease outbreaks.

The Centers for Disease Control (CDC) estimate that foodborne illnesses affect 48 million people each year, resulting in 128,000 hospitalizations and 3,000 deaths annually. Of all these illnesses, only 20% are caused by known agents; the rest are caused by “unspecified agents.” While more is known about the cases that led to hospitalization or death, more than half are still caused by unknown pathogens.

An “outbreak” occurs when a number of people become ill from a single instance of food contamination. Such outbreaks draw media attention to farming practices and the food supply. Increasing incidence of food-related outbreaks in recent years has generated consumer pressure on federal agencies to act, resulting in the Food Safety Modernization Act (FSMA). FSMA required the Food and Drug Administration (FDA) to develop a prevention-based food safety system described by the FDA as “the most sweeping reform of food safety laws in over 70 years.”

The “one size fits all” proposed regulation, aimed at industrial-scale producers and processors, was strenuously resisted by small-scale and organic farmers when it first arose in Congress in 2009. When the bill was being finalized in late 2010, small-farm advocates successfully made the case that products grown on small farms and distributed locally were less likely to cause foodborne outbreaks than products grown on large farms and distributed nationally. Because of their work, the Tester-Hagen amendment became part of the law. This amendment exempts

producers from certain parts of the regulation if they:

- › have annual sales averaging less than \$500,000 **and**
- › sell more than half of their produce directly to buyers in the same state as the farm **or**
- › sell directly to buyers no more than 275 miles from the farm

Pressured by consumer groups to act quickly in implementing the law, the FDA released two of five “foundational rules” earlier this year that describe the new food safety regulations. The first proposed rule regulates growing, harvesting, packing, and holding of produce for human consumption; the second defines “preventive controls” that will be required in FDA-registered food facilities.

The proposed produce rule is open for public comment through September 16, 2013. All producers who are growing crops covered by the rule – including lettuce, spinach, cantaloupe, tomatoes, sprouts, mushrooms, onions, peppers, cabbage, citrus, strawberries, and walnuts – might find it worthwhile to review the proposed rule and submit a comment.

Provisions of the law that may affect organic growers regardless of scale include irrigation water testing every 3 months, or more often, depending on water source; a 9-month interval between raw manure application and harvest; and a 45-day interval between compost application and harvest.

The small-farm exemption is being challenged by some consumer groups as unscientific. Numerous other details of the proposed rule are under scrutiny by the sustainable agriculture community, who are identifying many areas where the rule needs clarification.

Organic production practices are often poorly understood from the conventional food science perspective that only sterile food is safe.



Organic Certification and Food Safety

Food safety is not a new issue for organic growers in California. Many producers have already implemented food safety plans in order to comply with the Leafy Greens Marketing Agreement, a voluntary food safety audit system adopted by the California produce industry after the *E. coli* O157:H7 outbreak was traced to spinach from the Salinas Valley in 2006.

For those organic producers new to food safety, the good news is that “Organic farmers are three-quarters of the way toward having a food safety plan in place,” says Cathy Carlson, food safety program manager with Community Alliance with Family Farms (CAFF). Carlson works with farmers to develop food safety plans for their farms and processing operations (see the Food Safety Resources section). She points out that most food safety practices are common sense and already followed by the majority of growers; they just need to be written into a formal plan.

On the other hand, apple grower Coco House of CCOF-certified Coco Ranch feels that organic growers are especially challenged to defend organic production practices, which are often poorly understood from the conventional food science perspective that the only safe food is sterile food. House herself believes that the organic production model, with its focus on the health of the soil and consequent ecosystem balance, effectively supports food safety.

House, who uses weeder geese as service animals year-round in her orchard, developed a food safety program that met USDA standards and was successfully audited and certified by California in 2012. The program is firmly rooted in her farm’s Organic System Plan.

The strict standards followed by certified organic growers contribute to a high degree of food safety assurance. Epidemiological evidence backs up the overall safety of organic food: not one of 15,000 foodborne disease outbreaks documented by the Centers for Disease Control in the United States between 1998 and 2010 was traced to an organic product (Diez-Gonzalez 2012).

While not a guarantee of food quality or safety, organic certification contributes to keeping the food supply safe through its emphasis on detailed planning and recordkeeping, regulating inputs, encouraging sanitation practices, and cultivating biological diversity in the soil and on the landscape.

Recordkeeping/Audit Trail

The proposed FDA food safety rule requires that growers of covered crops institute a product tracing system that allows traceability of product along every step of the food supply chain from all distribution outlets back to the fields on which they were grown. Organic growers and processors are ahead of the curve on this requirement because they already submit an Organic System Plan to their certifier documenting all production and sanitation practices, inputs used, and markets to which crops or products are distributed. In addition, all certified organic operations undergo a rigorous annual inspection during which a specially trained inspector verifies that the Organic System Plan accurately reflects the operation’s practices.

In addition to the Organic System Plan, each certified organic operation must maintain an audit trail of all crops grown, their field locations, date and rate of input applications, date and yields of harvests, sales, and shipping records. CCOF requires that producers develop a sample audit trail: detailed documentation that creates “a recall system linking your product from field to sale.”

Such an audit trail is one of the fundamental requirements of the FDA proposed rule and provides traceability. The effectiveness of traceability in ensuring food safety was verified by agriculture economists at UC Davis who found that it “protects the reputation of an industry from randomly occurring food safety incidents by isolating the products from farms that were the source of the problem” (Pouliot and Sumner 2009).

Organic grower Phil Foster (of CCOF-certified Foster Ranch-Pinnacle Brand) utilizes best management practices on his highly diverse, certified organic farm, but does not yet have a full written food safety document in place. He feels that going through organic certification over the years, including annual inspections and following the Organic System Plan, will help him prepare for any required food safety audits and the requirement to have a written food safety plan.

Inputs

While certified organic farmers use a number of soil-building practices including crop rotation and incorporation of cover



Phil Foster described the detailed composting records he keeps for his Organic System Plan during the tour of his operation for CCOF's 40th Anniversary Celebration.

crops as their primary fertility management strategy, they also use an array of biologically based fertilizers to stimulate crop growth. All of these inputs must be allowed under the organic standards and listed in the Organic System Plan. Their application rate, date, and purchase receipts must also be documented.

Raw Manure and Compost Strictly Regulated

Despite public misconceptions, most organic farmers do not use raw animal manure as their primary source of crop fertility. National organic standards specify the length of time prior to harvest that raw manure application is allowed. For instance, vegetable crops like spinach and lettuce cannot be harvested sooner than 120 days after incorporation of raw manure in the field. Application of manure as a fertilizer has rarely resulted in an outbreak or contamination of product, and then only when basic common sense was violated (application of raw manure immediately prior to harvest).

A review of the scientific literature on risk associated with production practices states: "There is no demonstrated evidence that pathogens incorporated as soil amendments prior to planting can persist until harvest and be transferred to the edible portion of the crop" (Suslow et al. 2003).

Organic standards also specify composting practices and require high pile temperatures for specific lengths of time and frequent turning of windrowed composts. The NOP-mandated composting requirements are rigorous; research shows that the process results in the destruction of most pathogens (Shepherd et al. 2007; Jian et al. 2003; Lung et al. 2001).

Sewage Sludge Prohibited

The byproduct of municipal sewage systems, sewage sludge is banned for use in organic production, preventing this potential source of pathogens, heavy metals, and pharmaceuticals from entering the organic food supply.

Most Synthetic Pesticides Prohibited, Pesticide Residue Testing Required

Pest management is highly regulated in certified organic production. Organic standards strongly encourage growers, livestock producers, and processors to rely on integrated systems

approaches to managing insects, weeds, and diseases over the use of biocides. Certain biologically-based and synthetic pesticides are allowed in organic production only after rigorous scrutiny to ensure the materials are listed, according to the standard, as "generally recognized as safe" by the FDA and that they meet other criteria, including that the substances' "manufacture, use, and disposal do not have adverse effects on the environment."

The National Organic Program recently implemented mandatory pesticide residue testing that requires certifiers to analyze samples from 5% of their certified organic operations for pesticide residues. Additionally, organic standards specify that if pesticide residues greater than 0.05 of EPA's tolerance for that pesticide are found on any organic product, the product cannot be sold, labeled, or represented as organically produced.

Genetically Modified Crops Prohibited

Genetically modified (GM) crops are completely prohibited from being grown on certified organic farms. While negative environmental effects of GM technology have been well documented, including widespread emergence of herbicide-resistant superweeds and disruption of soil microbial nutrient cycling, potential negative human health effects of consuming GM crops are not as well researched (*Farm Industry News* 2013; Kremer and Means 2009). Consumers who wish to avoid GM foods are wise to purchase certified organic products.

Confined Livestock Facilities Prohibited

Organic livestock production is managed in a way that optimizes animal health and reduces risk of pathogen transfer to the final product. Large-scale confined dairy, feedlot, and poultry operations (the primary source of many of the pathogens that contaminate produce) are not allowed. Instead, animals must have access to the outdoors, ruminants must be grazed on pasture, and animals' natural behaviors must be accommodated. Ample sunshine and fresh forage keep animals healthy and help degrade potential pathogens that may be deposited in manure (Benbrook et al. 2010).

Antibiotics in Livestock Production Prohibited

Organic ranchers, dairy, and poultry producers are prohibited from routinely using antibiotics but are required to administer them

Well-placed plantings of grasses, vegetative buffers, hedgerows, and windbreaks can filter out soil- and water-borne pathogens and prevent them from entering irrigation water or otherwise moving across the farm.

when necessary to reduce animal suffering. Any animals that receive antibiotic treatments may not be sold as organic. Medical professionals have long known that the routine use of antibiotics in conventional livestock production is a significant source of antibiotic resistance in disease organisms, resulting in prolonged illnesses and increased deaths in humans due to pathogens that have acquired immunity to antibiotics (Smith et al. 2002; Catry et al. 2003; Shea 2003; Cosgrove 2006). The Consumer's Union recently wrote a letter to USDA Secretary of Agriculture Tom Vilsack recommending that specific antibiotic-resistant bacteria strains be classified as food adulterants (Halloran and Rangan 2013).

Sanitation Practices Encouraged

Certified organic postharvest and processing standards allow the use of sanitizers on food processing equipment and facilities. Allowed materials include chlorine materials (residual levels in water must comply with the Safe Drinking Water Act), acid-based sanitizers, and hydrogen peroxide. Mary Mulry, an organic product development consultant, notes: "The bottom line is organic foods are required to meet the same food safety and shelf life standards as all companies. Most organic companies are thriving and have figured out how to do those things without certain chemicals that the food industry uses."

Meanwhile, research is being conducted on new plant-based sanitizing agents. Dr. Sadhana Ravishankar at the University of Arizona has found that sanitizers made with essential oils and plant extracts are effective at reducing pathogen levels on organic leafy greens and have residual activity over a period of days. Ravishankar expects that some of these formulations will show promising results upon large-scale testing and pave the way for commercialization within a few years.

Biological Diversity

Building Soil Quality

The organic soil fertility and crop nutrient management practice standard mandates that growers "manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops,

soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances." Organic producers concentrate on building soil quality through crop rotation, cover crops, and composts in order to provide optimal nutrition for their plants.

Agroecosystem Design

When the Leafy Greens Marketing Agreement first came into effect after the 2006 *E. coli* outbreak, many growers felt pressure from buyers to utilize a "scorched earth" policy and remove any traces of wildlife habitat or conservation plantings from their farms and ranches. However, well-placed plantings of grasses, vegetative buffers, hedgerows, and windbreaks can filter out soil- and water-borne pathogens and prevent them from entering irrigation water or otherwise moving across the farm. Natural wetlands can also play a significant role in reducing pathogen spread on farms (Baumgartner and Runsten 2011).

Complying with New Regulations

Because of the significant number of foodborne illnesses in the United States, the FDA, at the direction of Congress, is implementing the most sweeping food safety regulation seen in this country for over 50 years. This regulation will affect all producers and processors of fresh, raw commodities regardless of operation size.

Certified organic operations already adhere to a rigorous set of production practices and maintain scrupulous records documenting all crops, inputs, and sales. They are restricted in the types of inputs they can utilize and must follow strict rules when utilizing raw manure and composts. Because of this, certified organic farmers and processors are well-positioned to comply with the new regulations.

More information on the proposed rules and instructions for commenting are available through the Organic Trade Association (www.ota.com/regulatory/foodsafety.html) and the National Sustainable Agriculture Coalition (<http://sustainableagriculture.net/fsma>). The CCOF blog will be updated as things progress at www.ccof.org/blog.



Food Safety Resources

A number of organizations are actively engaged in creating resources and programs for organic operations needing assistance with food safety. CCOF and others are very aware of the potential threats food safety regulations could pose to organic producers, but we are working diligently to avoid negative impacts. In addition, we recommend producers consider a food safety plan in advance of any regulations. CCOF reached out to profile a few of these organizations and determine what would be most helpful for our readers when considering a food safety plan.



Crafting a Food Safety Plan with CAFF

Help is available to develop a food safety plan. Cathy Carlson, a food safety expert with the Community Alliance with Family Farmers (CAFF) works with farms to develop food safety plans.

Carlson can work with individual farmers in the larger California Central Coast region, but for farmers located more than 75-100 miles from her home base she prefers to organize a public workshop on food safety. The workshop would include representatives and experts from other organizations who present information on issues such as livestock, marketing, and setting up a business plan.

Carlson requests that 10 or more participants plan to attend the workshop, which is usually offered at no cost and can be presented in various languages including Spanish and Chinese. One useful feature of these workshops is the opportunity to do a mock audit on-site. These are free and can be conducted in English, Spanish, or Portuguese. Carlson is available for one-on-one instruction in preparing for an audit, if needed.

Contact Carlson to get started and she will send you an email questionnaire to learn about your operation. In addition to understanding your farm, Carlson wants to know if your customers are asking for a food safety plan and/or a third party GAP food safety certification. If you aren't pursuing third party certification but simply want to be ready to hand a food safety plan to a customer should they request it, she can help you put that together.

Carlson believes that the best way to make a plan compatible with each farm's unique ecosystem is to come out and do a farm visit. With the farmer, she goes over the practices needed to adapt any existing farm plans, such as an organic system plan, into a complete farm safety plan. To start with, each farm needs a designated person as the contact for food safety.

Providing resources and technical assistance to farmers is a major component of growing access to local food.

Carlson mentions four additional requirements for a farm safety plan that complies with most food safety audit matrices:

1. A potable water test early in the season for total coliforms and generic *E. coli* as indicators of irrigation, drinking, and hand-washing water quality. Another service CAFF offers to farmers is coordinating a discounted water test program with a local, approved lab reducing costs from an estimated \$50 to \$10 or \$11 per water sample.
2. A pre-harvest growing area inspection to check for signs of animal activity
3. A written description of food safety practices
4. A plan to provide food safety training to workers

Certified organic producers are likely to already have a traceability or recall program in place as part of their audit system. Carlson will review your audit system to ensure it also meets the standards of a food safety audit.

The FDA's proposed new produce rules specify that they will not require duplication of existing records, so, for example, certified organic growers who document their use of biological soil amendments of animal origin will not need to duplicate these records. Carlson says "Food safety auditors are asking 75-80% pretty much the same thing" as organic certifiers.

Carlson is closely tracking FDA's proposed new food safety regulation. Contact Cathy Carlson at cathy@caff.org for more information, or visit the CAFF food safety website at www.caff.org/programs/foodsafety/plans.



Making the Most of FamilyFarmed.org

FamilyFarmed.org is a nonprofit organization committed to expanding the production, marketing, and distribution of locally grown and responsibly produced food in order to enhance the social, economic, and environmental health of our communities.

Providing resources and technical assistance to farmers is a major component of growing access to local food, and FamilyFarmed.org has a few programs that achieve this. Starting in 2009, founder and president of FamilyFarmed.org, Jim Slama, recognized the need for a comprehensive resource providing information on selling into wholesale markets. The manual, *Wholesale Success: A Farmer's Guide to Food Safety, Postharvest Handling, Packing, and Selling Produce*, was created as a result, and has been used in FamilyFarmed.org's wholesale success trainings to reach over 5,000 farmers in the United States.

Food safety is a growing concern and one that has affected wholesale food buyers and farmers. With recent food safety scares that have had national consequences, a focus on ensuring a reliable and safe food supply is incredibly important. Unfortunately, food safety regulations and restrictions are complicated and require considerable research to understand. In the past, farmers would spend thousands of dollars creating a food safety plan and getting certified. In response to these food safety concerns, FamilyFarmed.org created the On-Farm Food Safety Project (www.onfarmfoodsafety.org).

FamilyFarmed.org worked with a broad coalition of food safety leaders to develop the comprehensive On-Farm Food Safety Project. Will Daniels, who also serves as the board chair of CCOF, chairs the Technical Advisory Committee for the project. This program offers farmers, food safety professionals, and agricultural extension specialists technical assistance to develop risk-based food safety programs. The On-Farm Food Safety Project website includes a free, easy-to-use online tool that generates customized on-farm food safety plans based on user input. This is the only tool of its kind that provides individualized strategies that apply directly to a farmer's operation. Not only is the information customized, it's also based on Harmonized GAP standards developed by United Fresh and industry partners.

This tool has been specifically designed for small- and mid-scale produce growers to provide them with a full set of recordkeeping tools to document their food safety program and provide training to their employees. In addition to the tool, the Wholesale Success manual has been revised to include vital food safety information and is presented during FamilyFarmed.org national trainings. These programs are two of the ways FamilyFarmed.org works on behalf of farmers, but in order to grow the market for local food, connections between buyers, producers, and consumers are essential.

More information about FamilyFarmed.org's programs can be found at www.familyfarmed.org.



Egg Safety, Arsenic, and Food Safety with the Organic Trade Association

The Organic Trade Association (OTA) is engaged in food safety issues and organic production, including the two new proposed food safety rules, arsenic in the food supply, and egg safety.

FSMA Proposed Rules

In April 2009, OTA launched a Food Safety Legislation Task Force to track and analyze the development of the Food Safety Modernization Act (FSMA) and its impact on the organic industry, and recommend appropriate action. OTA successfully lobbied Congress to include language to prevent requirements from contradicting organic methods and materials. In January 2013, following the release of two key proposed rules implementing the produce safety and preventative control provisions of FSMA, OTA reconvened its Food Safety Task Force to analyze and prepare comments on behalf of OTA membership. OTA will ensure that the rules do not duplicate or conflict with the organic standards or cause unnecessary burdens to organic operators.

OTA's position is that organic producers and handlers have excellent management protocols in place and access to critical and compliant tools for preventing foodborne illnesses, and are at NO disadvantage in terms of food safety. In fact, organic producers are often ahead of the curve because of preventive control methods and product traceability required by the organic standards.

Arsenic

In response to research findings early in 2012 on arsenic levels in various organic products, OTA is working proactively on solutions to minimize the presence of arsenic in our food supply. The organization is actively engaged with regulators, farmers, food producers, and technical experts to better understand this issue and advocate for best practices to prevent and reduce its presence. Although arsenic is naturally-occurring, OTA believes manmade sources must be phased out. OTA's position is that arsenic's use in agriculture should be banned outright.

Egg Safety

OTA has worked diligently to ensure the FDA Egg Safety Rule and any corresponding guidance wouldn't conflict with organic standards. OTA arranged meetings with FDA and flew in members to discuss the egg safety rule, reminding FDA of potential damage to the organic egg industry should they interpret and enforce the Egg Safety Rule to restrict outdoor access for egg-laying chickens. FDA has been visiting organic operations and will soon release draft guidance specific to outdoor access. In response to OTA's work, FDA unofficially communicated the guidance will not conflict with the organic regulations.

OTA's website, particularly the members-only site, is a valuable source of information and provides many tools for organic producers and handlers. Visit www.ota.com to access information on arsenic, including OTA's statement, talking points, fact sheet, and executive summary white paper on the topic. The site also includes details on egg safety and a great overview and presentation on food safety.

OTA and NSF in partnership have offered a *HACCP for the Organic Professional* training and certification course. The course is designed for retailers, organic certification experts, manufacturers, and more. Participants receive a firm grounding in the principles of Hazard Analysis and Critical Control Points (HACCP) and sit for the HACCP certification exam. Course dates are available on the OTA site.

Wild Farm Alliance Guide to Food Safety & Conservation

Later this summer, *A Farmer's Guide to Food Safety & Conservation: Facts, Tips & Frequently Asked Questions* will be available on the WFA and CAFF websites. This brochure goes over basic factors that affect the survival and movement of foodborne pathogens on the farm, and how healthy, diverse ecosystems can help to keep pathogens in check. A set of frequently asked questions addresses everything from wildlife and compost issues to CSA visitors on the farm. Another section gives tips on how to have a successful food safety inspection and the resources list includes links to web pages where your auditor can learn about the co-management of food safety and conservation. Check soon at www.wildfarmalliance.org or www.caff.org.



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Food Safety Proposals Taking Shape

On January 16, the Food and Drug Administration (FDA) released two proposed rules for implementation of the Food Safety Modernization Act (FSMA), signed into law on January 4, 2011. FSMA passed in response to a number of high profile foodborne illness outbreaks and is intended to broaden FDA authority and focus more on preventive measures than recalls. One of the proposed rules is about produce safety and the other is about processing. The comment period for both rules, originally set to close May 16, was extended an additional 120 days, so all comments are now due September 16. Additional rules related to implementation of FSMA are expected.

CCOF co-sponsored two listening sessions with the FDA to discuss the regulations: April 9 in Tulare, California, on the Produce Safety Rule; and April 11 in Woodland, California, on the Produce Safety Rule and Preventive Controls Rule. Growers, processors, agricultural associations, USDA and CDFA staff, and others attended the sessions. FDA dedicated a substantial amount of time at each session to presenting an overview of the proposed rules but also took time for questions and answers. CCOF members were present at each of the listening sessions, asking good questions and making thoughtful comments on topics such as interface of requirements on wildlife, cost and compatibility of water monitoring and treatment, potential water use (such as misting and pesticide applications) requirements, and implications of the proposed restrictions on

time between application of manure/compost and harvest. While the proposed rules don't address the specifics for all of these questions, FDA indicated that many details will be clarified in industry guidance documents once the rules are finalized.

The proposed Produce Safety Rule would establish standards for growing, harvesting, packing, and holding produce on domestic and foreign farms in light of identified routes of microbial contamination of produce, including agricultural water; biological soil amendments of animal origin (such as manure); health and hygiene; animals in the growing area; and equipment, tools, and buildings. The proposed produce rules are intended to provide growers flexibility in their approach to food safety so it can be appropriate for the scale of production and type of agriculture.

The proposed Preventive Controls for Human Food Rule would apply to many domestic and foreign food processors, with a focus on preventing problems that can cause foodborne illness. The rule would require written food safety plans that identify hazards and specify the steps that will be put in place to minimize or prevent those hazards. FDA would evaluate the plans and continue to inspect facilities to make sure the plans are properly implemented.

While both rules are proposed and not final, it is expected that once the final rules come out there will be time to comply. FDA has recognized that small and very small businesses may need more time to comply and are proposing rolling phase-in dates. The agency will soon issue its proposed rule on importer foreign supplier verification. Future proposed rules will address preventive controls for animal food and accreditation of third-party auditors.

CCOF is working with task forces of the Organic Trade Association (OTA) and the National Sustainable Agriculture Coalition (NSAC) to analyze the proposed rules for impacts on our members and identify any potential conflicts with organic practices. We will continue to update our members about the content of the rules and welcome hearing your questions, concerns, and suggestions for aspects of the rules that may need comments.

Focus on California Issues

A number of important things are happening at the state level from recent findings of the Asian Citrus Psyllid (ACP) to increased concern about agriculture's effect on water quality, particularly with regards to nitrogen leaching.

CCOF continues to monitor and advocate the use of organic treatment options for ACP in eradication and quarantine zones. Zea Sonnabend, CCOF policy specialist, is participating in OTA's

Things are changing quickly! For the most recent Farm Bill updates, visit the CCOF blog: www.ccof.org/blog

Citrus Task Force, which is working toward the ultimate goal of establishing and gaining acceptance for uniform compliant protocols as alternatives to mandatory spraying of prohibited pesticides.

Steps for the task force include:

- Documenting data on economics of California organic citrus and organic agriculture in general
- Compiling existing research on alternative treatment protocols
- Protocol proving and case studies
- Federal and state advocacy

In response to new requirements from Regional Water Quality Control Boards for growers developing nitrogen management plans, the CDFA is developing new curriculum for crop advisors to assist them in working with growers to develop nitrogen management budgets. CCOF was asked to serve on a newly launched CDFA Ad Hoc Task Force on Nitrogen Management Training and Certification. CCOF Policy and Programs Director Brise Tencer urged the task force to factor in organic farming practices at the first meeting on April 25.

Farm Bill Update

The Senate and House again took up the farm bill in May with each chamber passing the bill out of the Agriculture Committee. The current extension of the 2008 bill leaves many important programs like the National Organic Certification Cost Share Program without funding and expires in September. As expected, the committee-passed bills have substantial differences, with the Senate bill including more of the organic provisions that CCOF and our allies have prioritized. The National Organic Certification Cost Share program was funded in the Senate bill but not in the House. Both chambers did include funding for organic research and language to exempt organic producers from federal marketing orders and allow them to petition the USDA for an organic research and promotion order, should the organic sector decide to do so.

As part of our farm bill work, we have been meeting with Congress members and their staff to discuss the size and scope of the organic sector, and explain why supporting USDA organic programs will help provide economic opportunities. We prioritize meeting with members in key positions, including those that sit on the House Agriculture Committee, the House Agriculture Appropriations Committee, or leadership positions. Our efforts have paid off with strong support for organic programs from an array of California members. During deliberations, Representative Jim Costa again introduced an amendment to restore funding to the organic certification cost share. Other

members spoke in support of organic programs, joined the House Organic Caucus, or showed their support in other ways. In recent months we have had the following meetings:

- Representative Sam Farr, CA-20, on March 28. Attending the meeting were CCOF members Chris Brown and Tony Serrano of ALBA, Tom Broz of Live Earth Farm, and several coalition partners, including PANNA and Wild Farm Alliance.
- Representative David Valadao, CA-21, on March 22. Attending our meeting were five organic growers: Dwayne Cardoza, Vernon Peterson (Abundant Harvest Organics), Steve Koretoff (Purity Organics), Malcolm Ricci (Bolthouse Farms), and Steve Beck (Kings River Produce).
- Representative Juan Vargas, CA-51, on April 2. Attending were three CCOF members: Tony Serrano (ALBA), Tom Page (Jimbo's...Naturally!), and Scott Murray (organic farmer).
- Representative Gloria Mcleod, CA-35, on April 2. Attending the meeting were three CCOF members: Tony Serrano (ALBA), Gary Flanagan (Shelton's Poultry), and Tom Friend (Chino Valley Ranchers).
- Representative John Garamendi, CA-1, ag roundtable meeting in March. Bryce Lundberg (Lundberg Family Farms) spoke on behalf of CCOF policy priorities. There were a number of other organic farmers present, including at least three other CCOF members.
- Secretary Tom Vilsack, roundtable discussion on April 18 in Encinitas, California, hosted by Go Green Agriculture. Tom Page spoke on behalf of CCOF.
- Provided CCOF talking points on farm bill to CCOF board member Karen Archipley as she did a whirlwind tour of the White House (where she helped plant the First Lady's garden), USDA, and Congress in early April.
- CCOF staff and certified members participated in the OTA Policy Conference & Hill Visit Days in May. CCOF growers Tom Page, Steve Koretoff (Purity Organics), Tim Shultz (Lundberg Family Farms), Carmela Beck (Driscoll's), and Jenny Lester Moffitt (Dixon Ridge Farms) met with many members from the California delegation, including Rep. Garamendi, Rep. Farr, Rep. Capps, Rep. Vargas, Rep. Valadao, Rep. Denham, Rep. Huffman, Rep. Thompson, Rep. Hunter, and others.

Spring 2013 NOSB Meeting Report

The National Organic Standards Board (NOSB) met April 9-11 in Portland, Oregon. NOP Deputy Administrator Miles McEvoy reported on the many activities of the National Organic Program

(NOP) in the six months since the last meeting. Recent activities include work on the previous NOSB nanotechnology recommendations, international agreements, and aquaculture standards. Proposed rules in progress include origin of livestock, final rule on sodium nitrate, and apiculture standards. Guidance documents still to come this year include grower groups, inspector qualifications, responding to results from pesticide residue testing, and handling unpackaged organic products.

The NOP has responded favorably to the comments of CCOF and other parties about excessive bureaucracy and paperwork with a new initiative, *Sound and Sensible*. This program will be adopted throughout the organic regulatory world by auditors who visit certifiers, within certification internal practices, and through reduction of grower and handler recordkeeping burdens. Look for positive changes in the months ahead as this develops.

Approximately 150 members of the public gave comments over the three days, supplementing almost 3,000 written comments. The majority of comments concerned extension of the allowance for tetracycline use to control fire blight in apples and pears. After hearing from dozens of people on both sides of the issue and an expert panel who addressed questions from NOSB

members, the motion for extension failed to meet the two-thirds majority needed to pass by a vote of 9 to 6. Therefore, clients have until October 21, 2014, to use this material, but then must find alternative ways to address fire blight.

Ancillary Substances (formerly "other ingredients"), another key issue for handlers, was voted into a final recommendation at this meeting. The adopted policy and procedure for review of these handling inputs (that occur mostly as incidental additives) will strengthen the way these inputs are reviewed by the NOSB. It will also make it clearer to certifiers and handlers what is expected and allowed when they choose ingredients for organic products.

The NOSB turned down petitions for Polyoxin D zinc salt and Indole-3 Butyric Acid (IBA) for crops, and sulfuric acid, barley beta fiber, sugar beet fiber, and 1,3-Dibromo-5, 5-dimethylhydantoin (DBDMH) in handling. Taurine was approved for pet food, but other amino acids were not. Discussion documents were presented on Seed Purity and GMOs, Excluded Methods Terminology, Confidential Business Information in Petitions, and Definitions for Production Aids.

The final recommendations will be posted at <http://www.ams.usda.gov/AMSv1.0/NOSBMeetings>.

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Ag Secretary Vilsack Recognizes Distinct Needs of U.S. Organic Agriculture

Speaking May 14 to member-attendees of the Organic Trade Association's (OTA) Spring Policy Conference in Washington, D.C., Secretary of Agriculture Tom Vilsack officially recognized the unique production system covering U.S. organic agriculture and announced guidance to remove agency obstacles to its continued growth.

"Organic is not the 'same as.' It is its own separate commodity and needs to be treated as such. I'm committed to that," Secretary Vilsack told policy attendees.

A major part of his speech focused on plans to increase coverage options for organic producers this year - and more during 2014 - under federal crop insurance provided through USDA's Risk Management Agency (RMA). In fact, he said, RMA will remove the current five percent organic rate surcharges on all future crop insurance policies beginning in 2014.

Getting accurate data is the biggest obstacle for developing better crop insurance options for organic farmers, Secretary Vilsack pointed out, expressing his desire that Congress help USDA make further progress by renewing the 2008 Organic Data Initiative as part of a new Food, Farms, and Jobs bill.

He added that USDA will be providing new guidance and direction on organic production to all USDA agencies, directing them to recognize the distinct nature of USDA certified organic production and organic goods, and to take

into account the documentation and inspection required for organic certification when considering organic operations' eligibility for USDA programs and policies.

The landmark guidance document Vilsack alluded to points out that through the National Organic Program (NOP), USDA has helped farmers and other operations create an industry now encompassing over 17,000 organic businesses in the United States and achieving \$35 billion in U.S. retail sales. In fact, organic ranks fourth in U.S. food and feed crop production at farm-gate values when viewed as a distinct category.

Organic standards already include requirements relevant to conservation programs, food safety, risk management, and export certifications. As a result of overlapping requirements, organic operations have faced redundant paperwork and fee burdens that would be streamlined or eliminated through cross-agency recognition protocols. Acknowledging this, the guidance document outlines that all USDA agencies consider a valid USDA-NOP organic certificate and Organic System Plan as the mechanism for third-party documentation for eligibility and proof of compliance for various agency programs.

The guidance also addresses data collection and research priorities to position organic food and farming for continued success.

"Organic production models may provide alternative solutions to current agricultural challenges, and it is the agency's responsibility to develop diversity in research and alternatives for all producers," the guidance points out. Importantly, the guidance also establishes that agency administrators review their goals and report on actions taken towards achieving the USDA strategic goals related to organic agriculture.

Organic production and commerce are bright spots in the American marketplace of innovation and entrepreneurship, and particularly can contribute to USDA's goals for rural economic development. In recognition of its potential, the 2010 USDA Strategic Plan called for an increase of 25 percent in U.S. certified organic businesses by 2015.

This recognition and guidance mean that organic no longer has to be a square peg trying to fit in a round hole. OTA thanks Secretary Vilsack and USDA staff for their leadership and vision.

The OTA Policy Conference was held in conjunction with OTA's members-only conference and congressional fly-in. OTA member companies - including representatives of CCOF - met with approximately 150 congressional offices the following day to advocate for policies that support organic food and agriculture.



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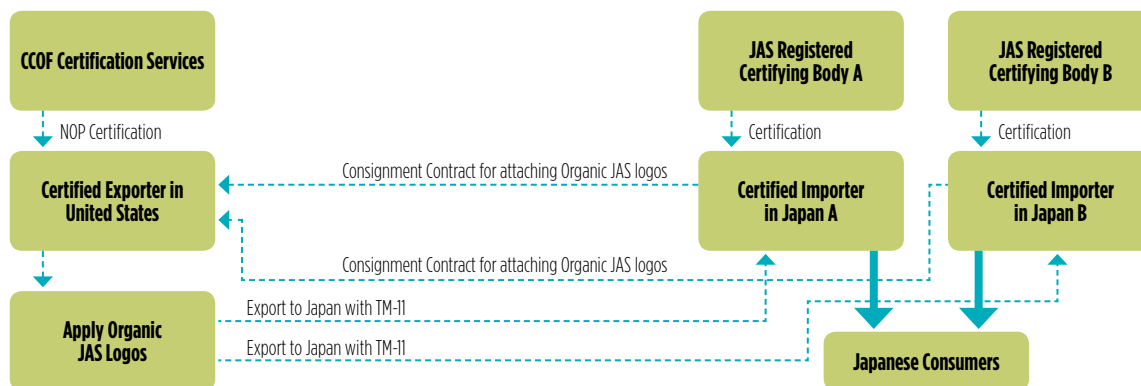
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Japan Changes Organic Export System, Allows Use of JAS Seal

Japan recently published information about a new export option that is expected to benefit CCOF clients and open up new trade opportunities. Under the new system, U.S. operators can work with Japanese importers to gain the ability to apply the JAS Seal to USDA NOP-certified products in the United States. This allowance will likely not only simplify import procedures but also support the development of multi-ingredient and retail products.

Background

The Japanese Ministry of Agriculture, Forestry, and Fisheries (MAFF) implemented the Japanese Agricultural Standard (JAS) organic law in 2004. As with other sections of JAS law, a specific JAS seal was required to appear on all organic items and could only be applied by qualified personnel within JAS organic certified companies. Any company applying the JAS seal had to be certified by a MAFF accredited certifier to the JAS standard. This made the existing production of retail products and expansion of additional products with pre-printed labels challenging. Later, MAFF signed an equivalency arrangement with the USDA that allowed JAS certified importers to apply the JAS seal to incoming products produced without certain inputs and requiring the use of a specific (TM-11) export document. This has supported limited trade with Japan, but because re-stickering with the JAS seal was required upon entry, it was mostly useful for single ingredient and bulk agricultural products such as nuts, raisins, etc.

The ability to apply the JAS seal is important as the JAS seal is an indicator of quality and standards compliance in Japan. Products

with the JAS seal are more readily recognized and accepted in the Japanese market.

Recent Developments

In April, MAFF announced a new system that allows U.S. exporters to sign special subcontract agreements with their importer to allow the use of the JAS seal in the United States. Under this system the American company must identify a responsible employee, undergo some minor training, and maintain records of JAS seals applied to products and JAS labeled products shipped to Japan. This model has some limitations, such as needing to use a seal specific to the name of each importer's certifier, but should support the production of retail goods with a pre-printed JAS seal, effectively opening up the market for U.S. NOP-certified goods. The allowance of a foreign company to apply the JAS seal is a noteworthy departure from existing Japanese food law systems that signals support for increased organic trade.

CCOF is actively working with the USDA and Japanese certifiers to support implementation of this system. We have developed a variety of tools to explain the process and can work with you and your importer.

If you currently maintain standalone JAS certification, please contact us so we can explore use of this simpler and less expensive option.

Planting Stock Guidance from NOP

On February 28, 2013, the National Organic Program (NOP) issued Guidance Document NOP 5029, "Seeds, Annual Seedlings, and Planting Stock in Organic Crop Production." This final guidance describes the NOP's direction to the industry and certifiers regarding how these materials may be sourced and treated, and specifying which records are necessary in order to meet the

We strive to provide cost-effective certification services that respond to your priorities.

USDA National Organic Standards. In general, few substantial changes affect CCOF annual crop producers.

However, the guidance clarifies what may be harvested and sold as organic with regards to planting stock and perennial crops. Twelve months of organic management for planting stock (both annual and perennial) is only required before the planting stock itself can be sold or represented as organic. However, the crops from that planting stock can be harvested and sold as organic at any time. Annual seedlings/transplants must be organic but nonorganic planting stock such as strawberry crowns, raspberry canes, or bud wood in grape production may be used to produce organic crops within twelve months of planting if no organic version is available.

To use bud wood as an example, an organic crop can be harvested from nonorganic planting stock, including both the grafted limb and the rest of the tree or vine, but the grafted plant itself could not be sold as organic until it has been managed organically for 12 months. Please note, like seed, nonorganic planting stock used to produce organic crops still needs to meet commercial availability requirements of 205.204(a)(1), which require attempts to source organic versions prior to use of nonorganic stock. At least three attempts to find organic versions in the necessary form, quality, and quantity from appropriate source should be made. Where contractual obligations exist to use specific varieties, operations must demonstrate good faith efforts to comply with commercial availability requirements in a manner that is applicable to their business and system.

Working to Maintain Consistent, Timely, and Cost-Effective Service

We strive to provide cost-effective certification services that respond to your priorities. Each year, CCOF receives about 11,000 requests for service from our clients, in addition to annual inspection requirements. These requests include new products, acreage, or labels; changes in formulation; updated supplier lists; and more. Certification staff reviews each of these items and responds with follow-up questions before giving approval.

Unfortunately, we can't keep fees low and immediately respond to certification requests. Therefore, we strive to be transparent with our clients about the service timelines that can be expected.

Our goals are to provide the following service, on average:

- No more than 7 days to review highly time sensitive items such as new input materials or labels
- No more than 21 days to review and respond to regular items
- No more than 30 days from the date of inspection to respond to highly time sensitive inspections such as new production, land, or products, or major issues
- No more than 60 days from the date of inspection to respond to regular annual inspections. Please remember that we can provide a copy of your certificate at any time or you can download a copy from MyCCOF (www.ccof.org/myccof), and all certified operations remain certified during the inspection and review process

We are glad that we've been able to consistently meet these goals, and continue to measure our performance on a quarterly basis to ensure action is taken when needed.

We also try hard to focus on the most time-sensitive client submissions, and frequently process important items like requests to use new pest control materials or approve new label artwork the same day they arrive! Because we constantly balance these priorities with other "regular" requests, we sometimes cannot meet our stated turnaround goal for every individual item or inspection. If you are submitting a request to CCOF, it is helpful if you inform us if your request is a high priority due to an impending deadline. The goals we have set allow us to measure our performance and communicate with our clients so we have mutually understood expectations. If we are in danger of not meeting our service goals, we will consider options such as hiring staff, striving for more efficiency, or other innovations to address the situation and ensure that our clients can expect consistent, timely service from us. We are careful to balance costs and service on an ongoing basis.

To ensure you get the service you need, you can monitor the dates your requests were received and the review deadlines set by CCOF by visiting the Action Items area of MyCCOF. If you need to speed up the process by enrolling in our Rush or Expedited programs to receive faster turnaround, you can do so for a modest additional fee. By charging additional fees to rush certain items, we can keep our base fees low for the 1400+ small farmers and processors we certify while providing fast turnaround for those that need it.

We are always working to reduce the number of items you are asked to submit (see Certification News in the spring edition of *Certified Organic* for great news in this area) while providing more efficient processes to benefit you while minimizing costs. We welcome your feedback and thank you for your support.

Food Safety and Organic Certification

How Can CCOF Help You?

Food safety continues to be a hot topic for consumers and producers alike. The passing of the Food Safety Modernization Act (FSMA) and recent release of the proposed FSMA rules by the FDA raise important questions to CCOF members. While FSMA provides a structure for a new system of food safety verification, the entrance of the federal government into the fray has created additional questions about how the program will be implemented. See our feature article on page 22 for the full story on how organic is well positioned for future food safety regulations.

Many farmers and processors are already being asked to be certified to one of the existing third party food safety standards by retail buyers such as Costco or Walmart. We anticipate that implementation of the FSMA rules will mean more companies will pursue food safety assessment and/or certification. Even if law does not require it, assessment and/or certification may be required for farmers and processors to be able to sell their product!

To help us determine if and how we would offer food safety certification, we launched a survey to assess our members' needs. This feedback will shape the development of a CCOF business plan for moving forward in this area. The survey was posted on our website on April 9 and distributed via email to all certified members. We received 290 responses and they have provided some interesting insight on how to structure a plan for this type of service. CCOF also interviewed major retailers to identify their requirements for their suppliers.

Some preliminary findings:

- The majority of grower respondents are not currently inspected or certified to a food safety standard; however, the majority of processor/handler respondents are currently inspected or certified to a food safety standard.

- 47% of processor/handler respondents are asked by a retailer or other downstream entity to be inspected or certified to a food safety standard. 26% of growers and 40% of livestock producers anticipate the request in the foreseeable future.
- Grower, livestock producer, and processor/handler respondents all show some interest in a potential CCOF Global GAP certification.
- Requirement from buyers is the strongest reason for respondents to consider a CCOF Global GAP certification program. Beyond that, survey results showed an interest in combining food safety inspections with organic inspections.

Members expressed concern over the burdensome paperwork and potential shortcomings some food safety plans have regarding organic methods. We are certainly aware of these concerns and seeking feedback to help overcome these issues. One respondent shared:

"We believe that it is essential for the safeguarding of organic integrity and the future of the movement that CCOF participate actively in these food safety issues in the same way we felt it was necessary for CCOF to participate in the creation of the NOP."

It is for reasons like these that CCOF is investigating this opportunity, and we hope to continue to share our progress with our members in a transparent and efficient manner. Let us know what you think. Send your thoughts to marketing@ccof.org.



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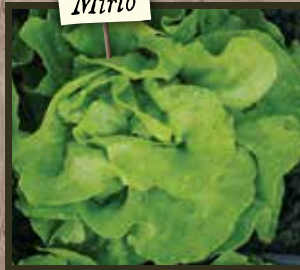
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