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Leading the Way to a More Humane Future for Livestock and Poultry



**Secretary Perdue Announces USDA Reorganization
Membership Vote on CCOF Bylaw Amendments
Organic Cannabis Certification?**



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22

Leading the Way to a More Humane Future for Livestock and Poultry

Large and small, organic operations widely support the Organic Livestock and Poultry Practices rule as essential to maintaining the quality standard that consumers expect from organic.

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Animal Welfare and Consumer Expectations

The Washington Post recently ran a widely circulated article under the headline “Why Your ‘Organic’ Milk May Not Be Organic.”

Concerns raised by the *Post* are the very concerns that organic advocates work to address every day. Consumers should have a choice between organic and non-organic products, and organic products should strive to meet consumer expectations—expectations that sometimes reach beyond the USDA standards.

Alarming headlines are one thing. But the truth about organic milk is quite another. Consumer Reports encourages its followers to buy organic when it comes to milk because “Department of Agriculture rules require organic dairy farms to use 100 percent organic feed, no growth hormones, and no antibiotics. Buying organic also supports healthy agricultural practices. Organic milk from grass-fed cows costs a little more but has slightly more CLA and omega-3 fatty acids.” (goo.gl/ZyEY4W)

USDA requirements for organic production sometimes provide more leeway than what consumers expect. This month’s

feature story by Tami Weiss examines the impact of a long-awaited USDA Organic Livestock and Poultry Practices rule that would clarify some of the ambiguities in the current animal welfare requirements under the organic rule. Fourteen years in the making, the fate of the rule now sits within the new administration in Washington D.C.

This issue’s feature story explains how organic can better align itself with consumer expectations when it comes to animal welfare through adoption and implementation of the proposed Livestock and Poultry Practices Rule. CCOF strongly supports the rule because it requires high animal welfare standards and would make the standards that CCOF has always required applicable to all USDA certified organic producers.

The feature story also provides those who may not be up to speed on the rule with a basic understanding of what it entails and how it will positively impact organic livestock and poultry production.

If you are moved by the story, please take a moment to contact us at policy@ccof.org, and we will let you know how you can weigh in to make your voice heard.



Cathy

Cathy Calfo
CCOF Executive Director/CEO

Issue Contributors

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Tami Weiss is a freelance writer and editor specializing in environmental issues, with a focus on all things food, health, and travel. Although she was born and raised in the urban San Francisco East Bay, she spent her childhood hiking, camping, and fishing in the foothills of California. A passion for the outdoors led her to earn her Bachelor of Arts in environmental studies and biology from the University of California, Santa Cruz, and her Master of Arts in international environmental policy from Middlebury Institute of International Studies. An avid traveler, Weiss has lived and worked abroad on issues ranging from literacy, to nutrition, to wildlife rehabilitation. Closer to home, she’s worked in the environmental field on education, program development, event management, and research.

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CCOF Members Defend Animal Welfare Standards

Over the last six months, CCOF members engaged with their elected representatives and the USDA to defend the final Organic Livestock and Poultry Practices rule (OLPP). USDA keeps delaying the rule's implementation date and has asked for public input on whether it should withdraw the rule altogether. CCOF and its members have long advocated for the rule and will continue to urge USDA to implement it.

As described in this issue's feature article on Page 22, the OLPP clarifies and strengthens animal welfare standards for certified organic production. The USDA National Organic Program (NOP) issued the rule after lengthy deliberations within the National Organic Standards Board (NOSB), the federal advisory board to the Secretary of Agriculture on organic standards. The rule would ensure that all organic producers are held to the same high standards used by CCOF members, including adequate outdoor access for poultry.

As CCOF member Kelly Mulville of Paicines Ranch explained in a letter to his congressional representative, "It is extremely important that organic regulations reflect the spirit and intention of producing high-quality food that respects the life and needs of living animals."

The organic sector overwhelmingly approves of the OLPP, but a few poultry companies are lobbying against it. The OLPP was

developed with over 14 years of stakeholder input, including numerous public comment periods during NOSB deliberations. Yet a few companies who do not want to change their practices to comply with the rule are asking Congress and the USDA to stop the rulemaking process.

The attempts to block the OLPP are concerning to all organic producers, not just livestock producers. CCOF member Jesse Buie of Ole Brook Organics, Inc. hand-delivered a letter supporting the rule to Senator Thad Cochran (R-MS), chair of the Senate Appropriations Committee. Buie's letter succinctly explained the issue:

"Blocking NOP from implementing the Organic Livestock and Poultry Practices rule would severely harm *all* organic producers, including me, because it will undermine the established procedure for setting organic regulations. Organic certification is a voluntary regulatory program in which standards are set through a highly transparent stakeholder process. The success of the organic label depends upon consumer trust in the national organic standards and the NOP's ability to oversee strict enforcement of those standards. If the rule is blocked from implementation, then it could set an alarming precedent for the future of organic standards and consumer confidence in the integrity of the label."

To protect the OLPP, CCOF members are stepping up to advocate for the organic rulemaking process and animal welfare standards. They are contacting their congressional representatives and submitting comments to the USDA. Additionally, our members joined over 300 certified organic livestock producers to sign a letter to now-confirmed USDA Secretary Sonny Perdue urging him to implement the rule. The letter, produced by the Organic Trade Association,

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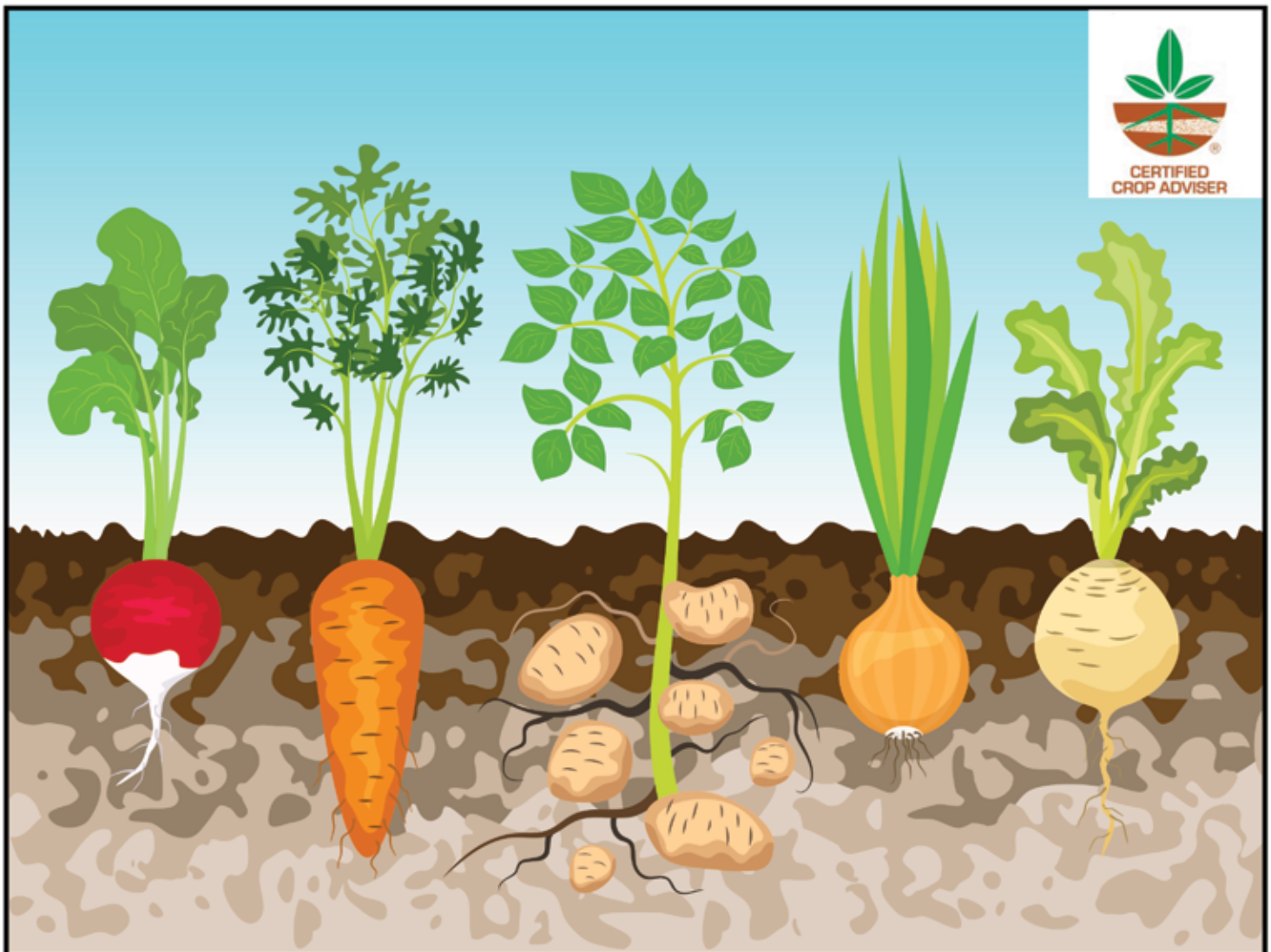
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We need your help to protect the organic rulemaking process and to strengthen animal welfare standards.

was also sent to the White House and to key congressional representatives.

So far, CCOF members have helped stop congressional interference in implementation of the OLPP. However, USDA delayed the rule's implementation date until November 14, 2017 and reopened public comment. USDA is asking for input on whether to implement the rule, suspend it indefinitely, or withdraw it altogether.

CCOF is working with our members to submit comments in strong support of immediate implementation of the OLPP. Our goal is to flood the USDA with comments demonstrating the importance of this rule to the organic sector. To get involved, contact us at policy@ccof.org—we need your help to protect the organic rulemaking process and to strengthen animal welfare standards.

Secretary Perdue Announces USDA Reorganization

On May 11, 2017, USDA Secretary Sonny Perdue announced several organizational changes to rearrange resources and priority areas within the department. At the forefront of the changes is the creation of an undersecretary for trade and foreign agricultural affairs in USDA. Secretary Perdue also announced the naming of a new mission area on Farm Production and Conservation, and elevated USDA's Rural Development agencies to report directly to the secretary.

The creation of the undersecretary for trade and foreign agricultural affairs moves the Foreign Agricultural Service under that undersecretary's purview. It was previously housed with the Farm Service Agency. The 2014 Farm Bill gave USDA the ability to split the existing position of undersecretary for farm and foreign agricultural services into two positions: one to oversee the Farm Service Agency and Risk Management Agency, and the other to oversee the Foreign Agricultural Service and parts of other agencies dealing with exports and imports.

Separating the Foreign Agricultural Service from the Farm Service Agency and the Risk Management Agency is intended to give the Foreign Agricultural Service the ability to focus on marketing U.S. agricultural products. Agricultural and food exports in the United States account for 20 percent of the value of production, and international trade is becoming a larger focus for many agricultural players.

"Our plan to establish an undersecretary for trade fits right in line with my goal to be American agriculture's unapologetic advocate and chief salesman around the world. By working side by side with our U.S. Trade Representative and Secretary of Commerce Wilbur Ross, the USDA undersecretary for trade will ensure that American producers are well equipped to sell their products and feed the world," Perdue said in the USDA release.

The Farm Production and Conservation mission area will focus on domestic agricultural issues, and will also receive a new undersecretary. This mission area will have a customer service focus and will provide more support to agricultural, ranch, and forestry professionals interacting with the agency.

With the restructuring of the Rural Development agencies to report directly to Secretary Perdue, the administration intends to place more focus on promoting rural prosperity.

These three main changes have been quietly received by most of the agricultural community, as many are adopting a "wait and see" approach to determining an opinion about the reorganization.

More controversial are the changes to the Natural Resources and Conservation Service (NRCS), as the undersecretary for natural resources and environment position is eliminated. NRCS will now be housed under the same umbrella as the Farm Service Agency and the Risk Management Agency, and led by the undersecretary for farm services, who is also in charge of other services such as crop insurance.

This restructuring of NRCS has elicited mixed reactions from agricultural professionals. Some say combining NRCS services with Risk Management Agency could produce beneficial collaborations between resource conservation and crop insurance. For now, crop insurance and conservation practices can sometimes clash, with certain practices making land ineligible for crop insurance. However, there is potential for a complementary relationship between the services and a more holistic approach to both of the programs.

Critics of the changes to NRCS are nervous about President Donald Trump's stance on climate change and environmental regulations, and worry that conservation will take a back seat to farm production.

Time will tell as to the effects of the USDA reorganization, but CCOF is always advocating for organic at the local, state, and federal levels. Want to learn more about our policy initiatives? Visit www.ccof.org/advocacy.

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CORE Foods Company operates from two guiding principles: treat others the way you want to be treated, and eat mainly whole fresh fruits and vegetables. The company's CEO, Corey Rennell, recognized the impact these principles have on the health of our bodies and the planet after traveling the world studying nutrition. He put them into practice in 2013 through the launch of CORE Meals, a certified organic product line, and again in 2015, with CORE Kitchen, one of only a few of our nation's certified organic restaurants.

In the heart of Oakland's bustling City Center lies CORE Kitchen, a treasured gem worthy of your next dining experience. Whether it be for a brain-boosting breakfast, a mindful lunch, or a simple, refreshing mid-day spritzer, CORE Kitchen will craft a 100 percent produce-only meal nourishing not only you, but also our local and global communities alike. Every single ingredient used in this CCOF-certified organic restaurant was grown on a certified organic farm.

If a trip to Oakland is not possible, don't fret! Instead, you can appreciate a CORE Meal, a read-to-eat pack of hearty oatmeal to go. These certified organic meals are made with minimally processed ingredients and can be purchased online or at vendors nationwide. All CORE Foods Company offerings

through CORE Kitchen and CORE Meals are organic, gluten-free, and vegan.

CCOF had an opportunity to speak with Rennell recently. Here's what he had to share with us:

What is most notable about CORE Foods Company? What are you most proud of as it relates to your organic status?

We love organic farming so much that we opened the world's first produce-only restaurant! Literally every ingredient we use is an organic fruit or vegetable picked from the earth! We use no canned stuff, no salt, no oil, no sugar—we want to highlight the incredibly diverse flavors growing right out of our rich, bountiful soil. From zucchini noodle pastas drenched in freshly cracked coconut lime sauce to collard wraps overflowing with plantains and black beans, we are proud to serve the freshest and most nourishing cuisine ever created.

Why did you choose to become certified organic?

Tell me instead why companies choose not to be certified organic! Our lives are so short we are only the brief caretakers of this earth. We believe our children deserve to live in a world free of harmful pesticides with integrated pest management and growing systems that enhance our ecosystem. We believe in the abundance of the earth and want to cultivate a sustainability that preserves that forever.

Why is organic important to you?

Organic is the first step in transitioning our relationship with the earth back to one that is symbiotic. It's a long-term good decision that utilizes less energy, less water, lower toxins, and produces a higher yield. Our company believes in planning beyond our lives—

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Green Hope donates 1 percent of vodka sales to the CCOF Foundation's Future Organic Farmer Grant Fund, supporting organic education for students from kindergarten through college.

on a species level—and that to be our healthiest community we must evolve short-term resource- and waste-heavy systems of farming. We will benefit greatly in the long term.

Any there any recent or upcoming events that you would like our readers to know about?

On May 16, we partnered with Real Food Real Stories to deploy 14 volunteers to relieve our zucchini farmer, Efren Avalos, so that he could come and enjoy for the first time his incredible local zucchini prepared in our kitchen. Through our partnership with Mandela Marketplace we connect with resource-poor farmers to help them succeed. As an immigrant farmer in this political climate, Efren has an inspiring story of challenge, hope, and perseverance to share. Matched with our practice of preferentially hiring formerly incarcerated team members to staff our kitchen, every time you eat at CORE Kitchen, you are making our community better and our earth a healthier place.

Do you have any growth plans you would like to share?

We believe everyone has the right to have access to healthy food. We are refreshing the grocery store by growing an array of healthiest-in-category items our consumers trust to be uncompromising in health and quality. Our CORE Meals have long been the freshest meal-to-go in the grocery store, and we are just launching CORE Granola, the world's first whole food granola with no sugar, salt, or oil, as we speak! You can find our packaged foods in Whole Foods, Sprouts, and Costco. CORE Kitchen serves as our test kitchen, so if you want to know which top-secret items we'll be launching soon, come visit us for a meal.

Learn more about CORE Foods Company at www.corefoods.com.

From Wine to Whiskey (and a Little Vodka)

It was about five years ago when friends Matt Weese and Colin Harter were having cocktails together, and Harter proposed getting into the whiskey business together. Despite being a whiskey drinker, Weese was making wine for a living at the time. Weese recalled, "It wasn't hard to convince me. It was actually Harter's wife that did it. See, we come up with crazy ideas all the time that usually get shot down the next day by his wife. But she was all about the distillery at breakfast, which convinced us we were on to something."

Harter and Weese are now business partners running Green Hope Lost Republic Distilling Company in Healdsburg, California. The company currently produces three types of certified organic vodka (cane, corn, and wheat).

Weese's passion for organic runs deep. "We want organic to grow," he said. "We want more and more people to see the value of organic products." As a way of practicing what they preach, Green Hope donates 1 percent of Green Hope Vodka sales to the CCOF Foundation's Future Organic Farmer Grant Fund, supporting organic education for students from kindergarten through the end of college.

When asked how organic farming education ties into Green Hope's mission as an organization, Weese responded, "We want organic to extend beyond the produce section. We want people committing to organics and really understanding the difference it has from conventional farming, especially in grains, since we use primarily grains in our vodka production. There is only so much we can fit on the bottle's label to tell people this story, so it is important to us that we make an effort to get the word out there and spread in other forms. We think the most effective form is youth education."

Weese feels that donating partial profits is helpful in growing the organic farming movement. At Green Hope, he believes that "positively motivating people to get involved with organics is by far the most effective way for us to keep pushing this movement forward."

The company's website boasts about what they call "sustainable sipping". Green Hope believes that, "you can't make the best drink on earth if you aren't using the best ingredients on earth. From premium grains, perfectly distilled, we bring you Hope that you can drink just as organically as you can eat. This is why we made it our mission to produce clean, organic, non-GMO spirits that you can feel good about drinking. Inspired by fresh ingredients and crafted by hand, Hope Vodka is viably sourced from USDA certified organic family farms."

While Healdsburg and the surrounding Sonoma County may be known for their world-class wine production, there are a growing number of breweries, and now distilleries too. As more and more operations pop up, it is becoming increasingly clear that organic food and beverage production can be profitable in all sectors of the food system, and in almost all geographic regions. Public demand for certified organic food is rising, in part thanks to companies like Green Hope who make it their mission to educate the public on what organic truly means. Educating our youth at an early age about agriculture will not only foster a more informed generation, but will also create future farmers to help feed the growing world using sustainable practices.

To paraphrase Green Hope, let's all try to drink as organically as we eat. Visit www.greenhopevodka.com for organic cocktail inspiration.

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FFA Future Organic Farmer Grant Fund Winners Co-Start Farm

Two recipients of the CCOF Foundation's Future Organic Farmer Grant Fund (FOFGF) award are starting a student farm together. Chancellor Choice Farms is the brainchild of Anna DeCarlucci and Gaby Zerna from Saint Thomas More Academy in Raleigh, North Carolina. The motivated young women are high school sophomores who serve as their high school's National FFA Organization (FFA) chapter president and vice president, respectively.

CCOF partners with FFA to distribute FOFGF grants to high schoolers across the United States who are interested in conducting an organic Supervised Agricultural Experience (SAE) project. The SAE projects are a part of the core FFA curriculum and are opportunities for FFA students to design and manage farming, research, and community-based projects that help students learn business, marketing, finance, and community development skills. CCOF awards \$1,000 grants to students who are interested in designing and conducting projects that are organic.

In 2016, DeCarlucci received a grant from the FOFGF to start an organic asparagus operation, and Zerna received one to build out a series of cold frames for winter extension. These grants gave both high schoolers the seed funding and inspiration to start Chancellor Choice Farms.

The FFA teacher and advisor for Saint Thomas More Academy, Kate Kirkpatrick, is a champion of organic, and her passionate students have taken that message to heart. Kirkpatrick fully supported DeCarlucci and Zerna's move to start an organic farm. Mrs. K (as DeCarlucci and Zerna call her) helped them start a new class on entrepreneurship and farming, which helps the students get credit for their efforts. There are now 14 students taking the class, which meets twice weekly. Several of the students enrolled have never studied or practiced agriculture.

"She's such a role model," both high schoolers said to describe their admiration for Mrs. K. "She's kind of given us the reigns of this project and let us go for it because she knows we have initiative," continued DeCarlucci.

That trust seems to be paying off. After DeCarlucci and Zerna decided to start the farm, they created a logo and launched a sponsorship campaign to help with their initial costs. They



partnered with the Veterans Farm of North Carolina and Zollmer Farm to provide products that the students could not produce on campus to fill out their weekly CSA boxes.

After they had their farm and partnership plan in place, the students marketed and sold weekly CSA-style box subscriptions to families and neighbors of the school and surrounding area. Their first set of 29 boxes were picked up the first week of May, and both DeCarlucci and Zerna agree that there is growth potential. "Right now, we are only selling to our inner community," said Zerna. "But we were contacted by many people and we feel we have a lot more connections to make." Both agreed that it helped that they could guarantee the box was organic. They even went so far as to describe their growing methods to some potential customers who were a little intimidated by the price.

Asked what they plan to do after high school, both spoke about potential ag-centered undergraduate programs. Zerna was surprised and impressed by the agricultural department of North Carolina State University, where she accompanied Mrs. K for a recent field trip. DeCarlucci plans to apply to Pennsylvania State University to study agribusiness. She currently manages the logistics and marketing side of Chancellor Choice Farms and she says she's excited about pursuing that as a potential career. Whatever aspect of agriculture she ends up pursuing, she said, she wants it to be organic!



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DeCarlucci and Zerna are successfully motivating both students and families to come together and choose organic food.

One of the main themes of both DeCarlucci and Zerna's FOFGF grant applications was to learn how to be a leader. One listed that she wanted to "show other FFA members how they can be more active in the school" and "provide fellow students with information on the benefits of organics." Judging from the initial success of their joint venture, these ladies are succeeding. Not only have they managed to start an organic farm on their high school campus, but they are also successfully motivating both students and families to come together and choose organic food.

Learn more about the FOFGF at www.ccof.org/fofgf.

Organic Training Institute Events for Fall

Through hands-on trainings, workshops, and seminars, the Organic Training Institute provides resources to aspiring and current organic professionals about the latest organic research and best production and marketing practices. We are putting together a great lineup of educational offerings for fall.

Here is a sneak peek at some of our fall events:

Curious about why CCOF doesn't offer organic certification for cannabis? Join the Organic Training Institute for a webinar this fall that covers frequently asked questions about why cannabis cannot be certified under the USDA National Organic Program. Webinar speakers will touch on alternative certification options for cannabis growers.

Organic inspectors and certification staff will join the Organic Training Institute and Community Alliance with Family Farmers (CAFF) for webinars and workshops on how the new federal food safety regulations intersect with organic regulations. Get up to speed on Food Safety Modernization Act (FSMA) basics, as well as food safety topics pertinent to organic growers.

All Organic Training Institute webinars, workshops, and tours will be announced in the CCOF weekly newsletter, which you can subscribe to at www.ccof.org/subscribe. Or, check out upcoming events at www.ccof.org/events. Learn more about the Organic Training Institute at www.ccof.org/oti.

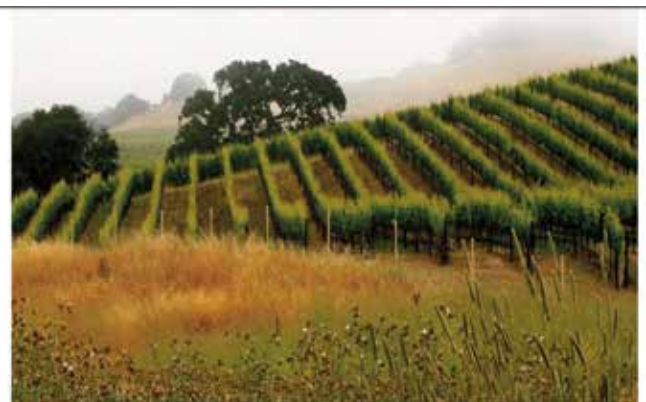


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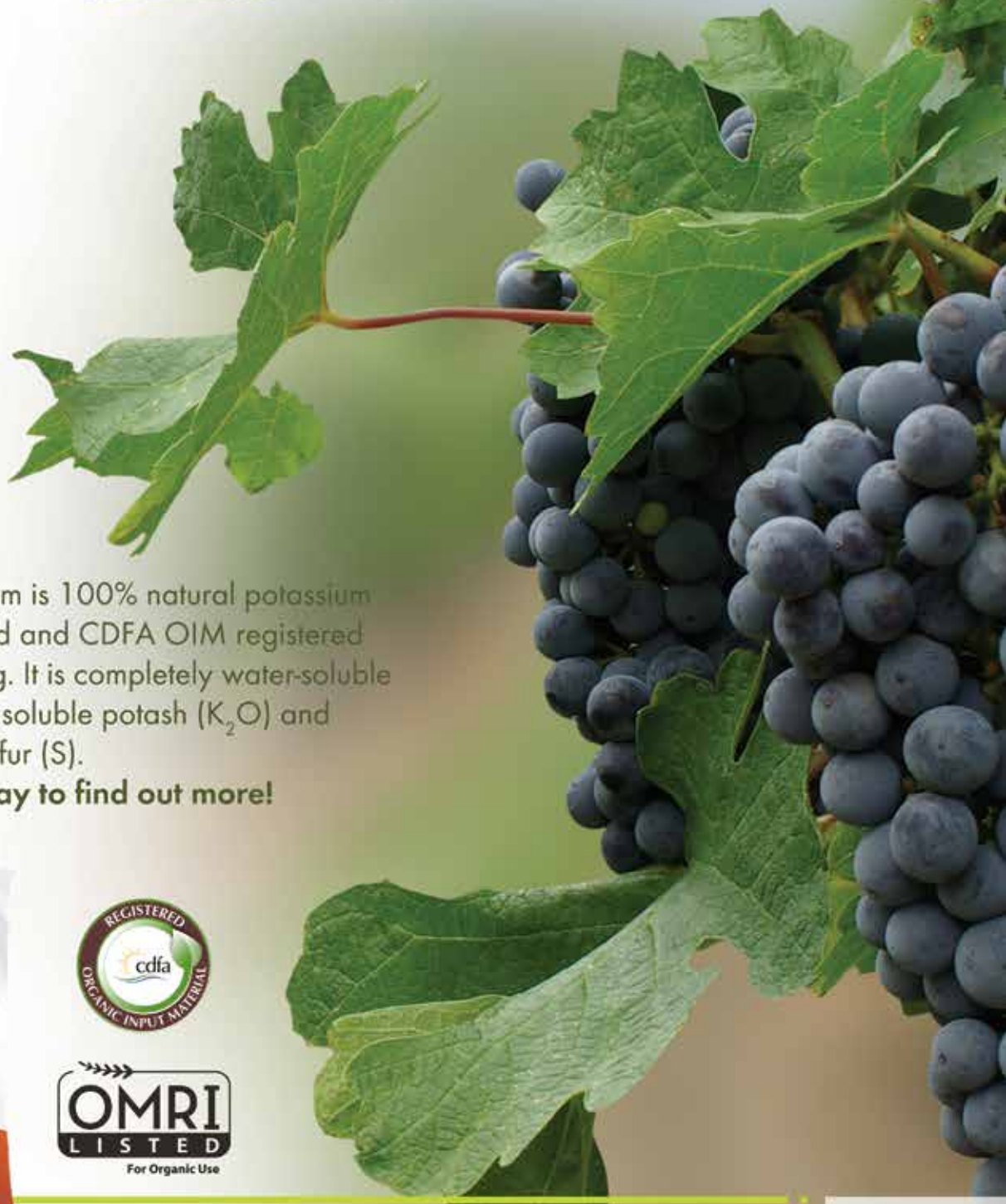


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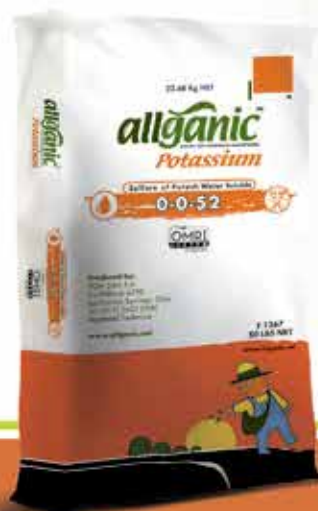
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Membership Vote on CCOF Bylaws

As summer graces us with an abundance of daylight, we look forward to an opportunity for the full membership to participate in a CCOF bylaws vote coming in September.

CCOF is governed by a board of directors elected by our membership through their chapters. Since CCOF was founded in California, the large majority of those chapters are based in California. Now that CCOF represents growers in 42 states and three countries, it is important to ensure that all CCOF-certified members are represented by an elected board representative accountable to a chapter in which they participate.

The amendments to the bylaws will allow the CCOF Board of Directors to form chapters that include currently unrepresented members, allowing them to elect board representatives; improve board operations; and support growth of the CCOF Foundation.

About the Amendments

- The CCOF Board of Directors will have the ability to form at-large chapters to ensure that every certified member is represented at the board level. (Currently, farmers outside of the regional California and Mexico chapters are not represented at the board level.)
- To keep the size of the board at an effective working level, formation of new chapters will require that at least 50—rather than 20—members petition the board for member-initiated chapter formation.
- The size of the CCOF Board of Directors will be limited to 17 members. This reflects best practices for effective non-profit boards of directors.
- Board terms will be extended from two years to three years and have overlap to ensure continuity. As CCOF grows and business operations become more complex, it takes time for board members to get to know the organization's internal workings and their roles as board members, and to become effective leaders.
- CCOF will establish tax-deductible supporting memberships for non-certified members within the CCOF Foundation, which will encourage broader public engagement in the important work of the foundation.

Watch your mailbox for your ballot in September and make sure you vote by October 2! Your paper ballot will also include a URL for voting online.

Make sure to attend your next chapter meeting to get more information about the amendments, and an opportunity to get

your questions answered. Your participation and voice in this vote is critical—we need every member to cast a ballot on these important updates to the organization's bylaws.

Spring Chapter Activity

On April 6, the Pacific Southwest Chapter held a meeting in Escondido. Eric Larson, executive of the San Diego Farm Bureau, gave a presentation on important issues facing the farming community, such as the regional Water Board Agricultural Order and Sustainable Groundwater Management Act, as well as issues concerning labor and immigrant worker rights. The chapter also held sign-ups for a government affairs committee and a planning committee for an Organic Symposium planned for September. CCOF Senior Policy Specialist Jane Sooby presented CCOF's 2018 Farm Bill priorities.

On April 17, the Central Coast Chapter held a meeting at the Aromas Grange. Karen Mallory, an immigration and naturalization attorney, addressed concerns and presented information about ways to support the immigration rights of farmworkers and families. A rich discussion was held about the regional Water Board Agricultural Order. Chapter leaders are looking for ways for organic farmers to certify that they already meet most of the order's requirements, and are also investigating whether it's possible to pool together resources through the chapter system to alleviate the extra time and paperwork necessary to comply with the order.

The Sierra Gold Chapter met in Placerville on April 23. Chapter members were very excited to embrace the potential of the CCOF website, especially the online directory (www.ccof.org/members). Congratulations to the newly elected Sierra Gold Chapter board representative, Rich Ferreira of Side Hill Citrus, and re-elected leaders Randy Hansen (president), Michal Lawrence (secretary), and Craig Thomas (treasurer).

Yolo Chapter held a meeting in Winters on April 19 with guest speakers from the local Resource Conservation District, Natural Resources Conservation District, and Point Blue presenting and discussing the different ways these organizations can help farmers with both technical support and financial assistance. Congratulations to Ryan N. Warren of Four Point Farms who is the newly elected Yolo chapter president, and to re-elected chapter leaders Susan Hassett (secretary), Ed Sills (treasurer), and Thaddeus Barsotti (board representative).

Want to get more involved with your chapter? Visit www.ccof.org/chapters to find your chapter, chapter contacts, and future chapter events, and we'll see you there! Contact afischer@ccof.org with any questions, comments, or chapter news you'd like to see in the next issue of *Certified Organic*.

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Leading the Way to a More Humane Future for Livestock and Poultry

WRITTEN BY Tami Weiss

Envision a world where healthy organic livestock and poultry have plenty of room to roam and engage in their natural behaviors.

CCOF farmers and ranchers have always led the way in innovative organic practices, and the proposed Organic Livestock and Poultry Practices rule would ensure a world where the health and well-being of the animals is a priority for all certified organic producers.

Originally scheduled to go into effect on March 20, 2017, implementation of the proposed rule was delayed two months and then postponed again in May 2017 for another comment period and six-month review. As organic continues to grow—with dairy and livestock accounting for over 17 percent of organic sales—these new regulations are even more critical to ensuring that organic can continue to scale up in a sustainable, humane way. If implemented in November 2017, the rule would provide greater clarity and specific guidelines to help producers and certifiers embrace the spirit of organic regulations.

CCOF producers, like Craig Thompson of Rockside Ranch in Northern California, already embody this spirit in their management practices. Thompson's pigs rotate through 100 certified acres of forested land, half an acre at a time, where they get to do what they do best: root through the understory

for their meals. His layers and broilers have similar freedoms, rotating through pasture with access to mobile coops. Pete Talbott of Talbott Ranch has a similarly holistic management approach for his 300 head of cattle. By rotating through acreage in both eastern Oregon and northern California, Talbott's livestock can graze outside year-round.

As stated by USDA itself, the purpose of the new rule is to level the playing field by creating greater consistency in livestock practices and to assure customer confidence in the integrity of organic. The rule would also resolve ambiguity around access to the outdoors for poultry and establish clearer guidelines for health care, living conditions, transportation, and slaughter.

For the health of the animals and the entire organic sector, CCOF welcomes and strongly supports the updated regulations as they apply to both mammals and poultry and discourages further delays in implementation. We'll walk you through some of the most important changes and updates in the rule, as well as how some CCOF producers are already meeting the proposed new requirements.

Nutrition and Body Condition

Current organic regulations spell out that rations for livestock must meet nutritional requirements, but a new addition to that section specifically clarifies that the feed must “result in appropriate body condition.” This guideline clarifies existing authority and creates greater consistency among certifiers, ensuring that animals are fed a diet appropriate to each species and their stage of life. If this guideline is implemented, USDA would publish further guidance to help certifiers assess and regulate “body condition.”

For many CCOF-certified organic livestock producers, the new rule would not present significant changes to their management practices. The health of an animal depends on the quality of their food. As Talbott put it, “Nutrition is an even more important part of a holistic management plan than I originally thought. By allowing the cattle to graze year-round, like they were designed to do, we’ve managed to sidestep a lot of potential health issues.”

In order to provide year-round grazing, Talbott’s herd grazes most of the year in eastern Oregon, then gets transported to the Foothills of Northern California in December, where they spend the coldest winter months away from the snow. In this way, the cattle are ensured a year-round diet of fresh green grass. Turns out, happy cows live in California *and* Oregon!

Prohibited Physical Alterations

On the other end of the specificity spectrum, 17 newly defined terms have been added to the organic livestock and poultry regulations, eight of which are surgical alterations that would be specifically prohibited (find the list of them on Page 24). Tail docking of sheep and face branding of cattle are also listed as prohibited practices. CCOF already prohibits all of these alterations and supports prohibiting them for all certified operations to ensure consistent enforcement.

Additionally, routine use of needle teeth trimming and tail docking in swine would not be allowed. Organic farms raising pigs could only use these methods after demonstrating that alternative methods have failed. Forced molting of poultry would also be specifically prohibited. These new humane standards are a welcome addition to the organic livestock regulations, as they bring clarity to areas that were open to interpretation prior to this rule.

More Specific Recordkeeping

In an effort to encourage the use of preventive healthcare management and effective treatment, sick and injured animals and instances of lameness would need to be monitored and recorded. Maintaining these types of records will be familiar to many farms certified by CCOF, as the current organic

regulations already have a general recordkeeping requirement. However, the new rules include livestock-specific details, which would be helpful for both certifiers and farmers in clarifying which records need to be maintained. Additionally, a written parasite control plan that includes preventative measures, fecal monitoring, and emergency measures must be approved by the certifier, as well as a written plan for humane euthanasia.

Living Conditions for Mammals

A 2017 survey from Consumer Reports indicates that consumers choose organic for the better health and treatment of the animals as well as the assumption that the animals live and graze outside. Consumers want their food to come from places like Talbott Ranch, where 300 or so cattle are outside year-round, rotating through 4,000 acres of certified pasture land with access to natural shade and open shelter. “Public perception is that animals raised organically are in a more natural outdoor environment their whole lives,” Talbott explained, and continued to praise these new regulations for bringing organic more in line with consumer expectations.

The organic livestock regulations already require that animals have year-round access to the outdoors with shade, shelter, exercise areas, fresh air, clean water, and sunlight. A new addition in the proposed rule would require that outdoor areas that include soil must have maximal vegetative cover appropriate for the season and region. Indoors, new shelter requirements would ensure that livestock have plenty of room to exhibit natural behavior, which specifically includes the ability to lie down, stand up, turn around, and stretch. Solid, comfortable bedding and resting areas must also be provided so animals can stay clean, dry, and free of lesions while resting indoors.

The new rule wouldn’t drastically reshape the way CCOF’s livestock producers manage their animals. On the contrary, organic livestock farmers deeply care about the health and well-being of their animals, so for many of them, the practices outlined in this new rule are already inherent in their approach to farming.

Swine-Specific Standards

New rules specifically require pigs to be housed in a group except sows during farrowing and suckling, or boars and swine with documented aggression or recovering from illness. Piglets can’t be kept on flat decks or in cages, and rooting material must be provided except during farrowing and suckling.

Thompson’s pigs at Rockside Ranch, for example, spend all but their first few days outside foraging through the forest. Many of CCOF’s members, like Thompson, already meet these new rules, so the biggest changes for them would be in regard to recordkeeping and documentation of their approved practices.

Organic livestock farmers deeply care about the health and well-being of their animals, so for many of them, the practices outlined in this new rule are already inherent in their approach to farming.

Living Conditions for Poultry

Instead of creating one set of standards for both mammals and poultry, the new regulations are separated out to better meet the unique needs and behaviors of the different species.

Poultry are already required to have outdoor access, shade, shelter, exercise areas, fresh air, direct sunlight, clean water, and materials for dust bathing. The principle behind the new poultry standards is to encourage animals to engage in their natural behaviors. If implemented, the new rule would require that the outdoor space be at least 50 percent soil with maximum vegetative cover. The year-round outdoor access rule includes exceptions for temperatures under 40 degrees or over 90 degrees, for certain stages of animal life and health, for preserving water or soil quality, or for sorting for shipping or sales.

Thompson's management of layers and broilers at Rockside Ranch won't be affected by these new standards. He sees this proposed update as getting "to the root of what the organic label is representing," he said. "Consumers are more educated than ever on what they're looking for and what they expect. Organic is a benchmark that they can trust and these updates help the industry match up with customers' expectations." Thompson's flock of over 2,000 birds has access to pasture year-round, with trees for shade during the summer and the choice to be inside their winter canopy or outside in the snow during the coldest winter months. Thompson trusts that the animals can regulate their own temperature, regardless of the season.

Indoor and Outdoor Requirements for Chickens

Indoor and outdoor space requirements for chickens have been outlined, with guidance to come in the future for other avian species. Six inches of perch space per bird is required for layers. The specific indoor and outdoor stocking densities outlined in the rule are designed to encourage layers, pullets, and broilers to engage in their natural behaviors, including stretching their wings and standing normally.

Within the existing organic livestock regulations, poultry porches fall into a gray area that was open to interpretation as either indoor or outdoor space. Under the new rule, since porches don't allow the animals to move freely into outdoor space, enclosed porches would be defined as indoors. Outdoors would be defined as any area outside an enclosed building or structure, including roofed areas that are not enclosed. CCOF has never certified an organic operation that uses porches and is pleased to see this clarification in the final rule.

New Definitions

Indoors or indoor space: The space inside of an enclosed building or housing structure available to livestock. Indoor space for avian species includes, but is not limited to mobile housing, aviary housing, slatted/mesh floor housing, and floor litter housing.

Non-ambulatory: Livestock that cannot rise from a recumbent position or that cannot walk.

Outdoors or outdoor space: Any area outside an enclosed building or enclosed housing structure, including roofed areas that are not enclosed and floorless pasture pens.

Perch: A rod- or branch-type structure above the floor of the house that accommodates roosting, allowing birds to utilize vertical space in the house.

Pullets: Female chickens being raised for egg production that have not yet started to lay eggs.

Ritual slaughter: Slaughtering in accordance with the ritual requirements of the Jewish faith or any other religious faith whereby the carotid arteries are simultaneously and instantaneously severed with a sharp instrument.

Soil: The outermost layer of the earth comprised of minerals, water, air, organic matter, fungi, and bacteria in which plants may grow roots.

Stocking density: The weight of animals on a given area or unit of land.

Vegetation: Living plant matter that is anchored in the soil by roots and provides ground cover.

Definitions of Prohibited Practices

Beak trimming: The removal of the curved tip of the beak.

Caponization: The castration of chickens, turkeys, pheasants, and other avian species.

Cattle wattling: The surgical separation of two layers of the skin from the connective tissue along a two- to four-inch path on the dewlap, neck, or shoulders, used for ownership identification.

De-beaking: The removal of more than the beak tip.

De-snooding: The removal of the turkey snood.

Dubbing: The removal of poultry combs and wattles.

Mulesing: The removal of skin from the buttocks of sheep.

Toe clipping: The removal of the nail and distal joint of the back two toes of a male bird.



In addition to the specific space requirements, inside structures must have enough natural light so that a person can read and write without artificial light, and any artificial light may only be used for 16 hours per day. Rockside Ranch already far exceeds the proposed space requirements, as Thompson's chickens spend their lives outside.

An additional indoor regulation requires monthly monitoring of ammonia levels, which must be kept below 10 ppm. If levels exceed 10 ppm, practices must be implemented to reduce levels along with increased monitoring until levels drop below 10 ppm. Ammonia levels must not exceed 25 ppm. For the most part, organic producers who have well-ventilated and well-maintained poultry houses will already be in compliance and will only need to add ammonia monitoring to their list of monthly recordkeeping tasks.

Transport and Slaughter

The final update in the new rule includes new guidelines about humane transportation and slaughter, starting with ensuring that all animals are fit for transportation and slaughter. If transportation times will exceed 12 hours, arrangements for water and organic feed must be made. These guidelines are well below the USDA 28-hour rule for transporting non-organic animals, and are in line with ensuring the health and welfare of organic livestock and poultry.

Supporting Future Farmers

If the rule is implemented, allowances will be made for 4-H, FFA, and other youth activities that permit temporary confinement of up to one week prior to a fair or demonstration, through the event, and for up to a day after the animals have arrived home. The facilities where the activities are held would not have to be certified organic for the animals to retain certified status, so long as feed and other organic requirements are met. This exception aligns with the CCOF Foundation's work to cultivate the next generation of organic farmers through its Future Organic Farmer Grant Fund.

Moving Forward

Originally published in January 2017, the final rule had undergone multiple rounds of public comment, was financially vetted, and was ready for implementation. Despite this comprehensive review of it, USDA failed to implement the rule on the anticipated date in May, and instead reopened the comment period, delaying implementation until November 14, 2017. So far, over 11,500 comments have been submitted in the most recent comment period.

These proposed standards reflect over 14 years of discussion, feedback, and support from consumers, organic producers, and certifiers. To protect the widely supported rule, CCOF encouraged members to comment and directly email Secretary of Agriculture Sonny Perdue requesting that the proposed rule be implemented without further delay. At the end of April, 334 certified organic beef, pork, dairy, and poultry producers representing approximately \$1.95 billion in annual organic sales submitted a letter to the USDA urging them to accept the rule in its entirety. Large and small, organic operations widely support these new standards as essential to maintaining the quality standard that consumers expect from organic.

CCOF has always required many of these standards of all its certified operations and supports making these rules applicable to all USDA certified producers. As one of the first organizations to call for more consistency in verifying that organic poultry have sufficient outdoor access, CCOF is pleased that, if implemented, these standards would bring clarity for consumers and ensure the health and welfare of all organic animals.

Want to learn more? Visit www.ams.usda.gov/rules-regulations/organic-livestock-and-poultry-practices for the final rule, fact sheets, and updates regarding implementation of the rule. Our policy team is working hard on trying to get the new rule implemented. Contact them at policy@ccof.org for more information.

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How to Engage in Organic Advocacy with CCOF

CCOF's members have several ways to be engaged and participate with CCOF's policy work supporting organic.

Contribute to the CCOF Action Fund

The CCOF Action Fund is dedicated to advancing organic agriculture through support of elected leaders who want to help us grow organic. The fund is governed by a board of directors comprised of organic producers, like you. Donations can be made at www.ccof.org/ccof-action-fund.

Sign Up for Our Newsletter and Action Alerts

CCOF's weekly newsletter is a great resource of information. Members receive the latest certification and policy news, information on events, and plenty of opportunities to engage in advocacy. The most common way that CCOF's members are engaged in advocacy is through submitting public comments on organic-related issues, and we use our e-newsletter to alert our members and organic advocates about upcoming comment periods. Commenting is a critical tool for members of the organic community to make a difference and has shown to be highly influential. CCOF will also share action alerts with members directly, letting them know that their actions are needed. Sign up for our e-newsletter at www.ccof.org/subscribe.

Attend CCOF's Annual Conferences and Policy Days

Farmers, ranchers, handlers, and producers are incredibly busy people. It can take a lot of effort to attend a meeting, hearing, or conference, but being present to speak on behalf of organic is crucial. CCOF shares information about events through our blog and newsletter. CCOF's 2018 annual conference in Sacramento is an exciting upcoming event where we will spend time speaking with elected representatives and statewide officeholders about the economic contributions of organic to California's rural and urban economies. More information on CCOF's 2018 annual conference will be shared as the event nears. For information about event sponsorship, contact Catherine Hsu at chsu@ccof.org.

Organize with Your CCOF Chapter

As a CCOF member, you can help shape the future of organic by helping your chapter organize local events to promote organic and educate consumers, advocate for organic research and programs, and reach out to educational institutions. Chapters help CCOF members maintain successful organic businesses by providing speakers at chapter meetings, networking opportunities with potential buyers, and connections to

farming organizations and resources. Chapters are made up of CCOF-certified organic operations and other organic supporters who are essential to the basic functions of CCOF. Most chapters meet a few times per year and engage in topics important to their region/sector. For further information, please contact CCOF Member & Public Outreach Specialist Adrian Fischer at afischer@ccof.org.

Keep in Touch with Us

We are always available to answer questions and are interested in learning about issues impacting your operation. You can reach the CCOF policy team at policy@ccof.org.

Nurturing Organic Seed Policy, Growth, and Access

Seed is much more than just an input. It is the fundamental starting point for transforming agriculture through nutritious, ecologically grown food, feed, and fiber, especially when coupled with the organic principles of building healthy soils, using non-toxic inputs, and stewarding natural resources.

As the foundation for organic farming systems, seed deserves continuous attention, including protection of its genetic resources, prevention of contamination, and a strong organic seed sector that meets the needs of a diverse and resilient agricultural system.

When the federal organic regulations were proposed in 2000 (and then enacted in 2002), the big issue was how to eliminate chemically treated seed from organic production. Organic seed was a tiny blip in the consciousness of even organic advocates, but thanks to the stability created by implementation of the federal law, the organic seed industry could start to grow.

Over the past 15 years, the emerging organic seed sector has significantly overcome the past stigmas associated with organic seeds: poor germination, inconsistent trueness-to-type, and unreliable performance in organic conditions. However, there is still a considerable way to go until organic seed is widely available for all crop varieties in all organic systems.

The National Organic Standards Board (NOSB) proposed recommendations in 2005 and 2008 to help stakeholders and the National Organic Program (NOP) interpret the clauses in the regulations regarding organic seed use. This resulted in NOP publishing a Guidance Document (NOP 5029) in 2013. The guidance adopted many—but not all—of the NOSB recommendations, and many stakeholders felt they were not strong or specific enough. Organic seed users need specific traits—such as disease resistance and ability to germinate in

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cold soils—that may be different from those that are useful in conventional production. Regional adaptation and resilience are also very important for the organic seed supply.

For those reasons, and because of concerns about genetic contamination of the organic seed supply, the NOSB has taken up organic seed again to try to strengthen the Guidance Document and perhaps strengthen the regulations themselves. A proposal for revisions was discussed at the NOSB meeting in April and will be on the agenda again for NOSB's fall 2017 meeting. There will be another opportunity to comment on the proposal during the September/October comment window.

Key issues that still need to be decided include:

Should crops at risk from GMO contamination have additional requirements for sourcing seeds?

The NOSB worked for several years on how to assure seed purity for at-risk crops, but has not yet come to a recommendation that can be implemented by NOP. Many stakeholders would like there to be a required testing protocol, or a level of contamination that would result in a non-compliance. Some have proposed requiring growers to contact at least five seed suppliers to ensure they have made adequate efforts to source more organic seed. Others oppose requiring a specific number of seed searches; rather, they support more flexible enforcement tools, such as requiring producers to keep

a sample of their seed on hand for future testing in the event that a certifier needs to trace back a source of contamination.

How can we ensure continuous improvement in sourcing organic seed?

Surveys of organic growers show an uneven pattern in the use of organic seed. While small growers and grain growers tend to use a substantial amount of organic seed, large growers and specialty vegetable growers tend to have the lowest adoption rates of organic seed. There are a variety of reasons for low adoption rates of organic seed, such as low availability of a suitable quantity and selection of seed. Many stakeholders have suggested that certifiers should require producers to increase the amount of organic seed they use over time. The organic seed sector can only grow if seed users continue to request organic seed and specify what varieties and traits they need.

What documentation is sufficient for seed quality, quantity, and equivalence in choosing non-organic seed?

Accredited certifiers have expressed interest in having more enforcement tools to ensure growers increase the use of organic seed. However, the potential benefits of additional documentation for seed usage must be weighed against the impacts of increased paperwork and reporting requirements.

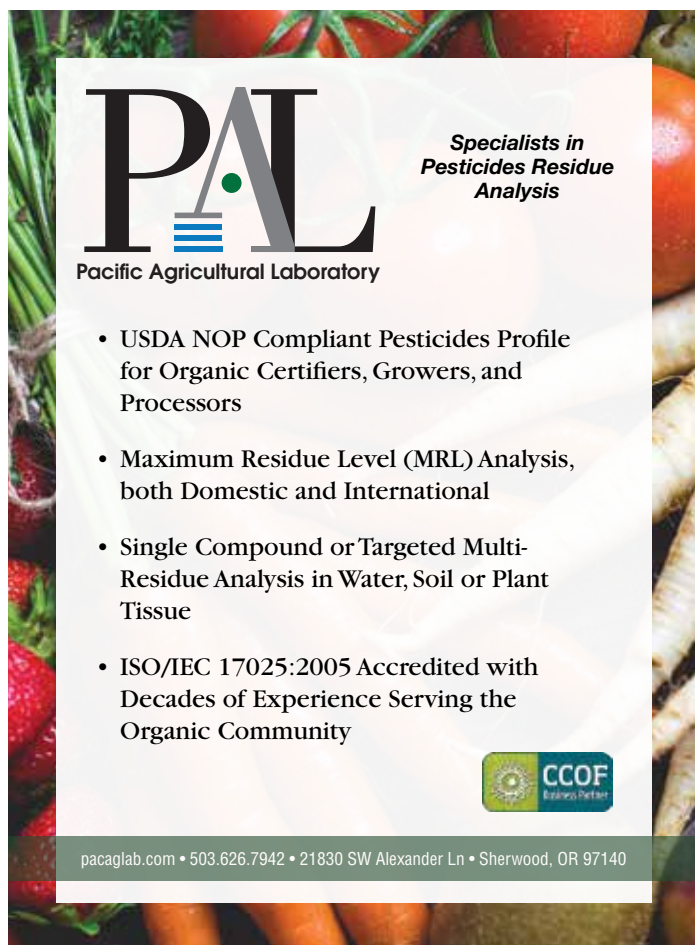
How can we address handlers and others who source seed for organic producers?

It is becoming more common for buyers or handlers of a crop to either supply the seed to the grower or to mandate what variety needs to be grown. Also, some growers buy transplants from greenhouse producers who source the transplant seed. Second parties who source seed for organic growers should be subject to the same scrutiny as organic growers in their search for commercially available organic seed. Therefore, further guidance would ensure handlers are held accountable for sourcing more organic seed.

How can a seed availability database be established or improved?

Almost everyone agrees that a clearinghouse for organic seed availability is needed. However, the effort to establish a good organic seed database has not been successful so far. The NOSB is exploring asking the NOP to either host such an effort, or to fund the Organic Seed Finder database so it can be more complete and viable.


CCOF supports a strong organic seed system and will be participating in the comment process for the next version of organic seed recommendations. We encourage all our members to also become involved by planting organic seed as much as possible, always requesting organic seed, and continuing to build demand for a robust organic seed sector.



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Robust Organic Sector Posts New Records in U.S. Sales

The robust American organic sector gained new market share in 2016 and shattered records as consumers across the United States ate and used more organic products than ever before, according to the Organic Trade Association's (OTA's) *2017 Organic Industry Survey*.

Organic sales in the United States totaled approximately \$47 billion in 2016, reflecting new sales of almost \$3.7 billion from the previous year, when the \$43 billion in organic food sales marked the first time the American organic food market has broken through the \$40-billion mark. Organic food now accounts for more than 5 percent—5.3 percent to be exact—of total food sales in this country, another significant first for organic.

Organic food sales increased by 8.4 percent, or \$3.3 billion, from the previous year, blowing past the stagnant 0.6 percent growth rate in the overall food market. Sales of organic non-food products were up 8.8 percent in 2016, also handily surpassing the overall non-food growth rate of 0.8 percent.

The survey also showed that organic is creating jobs. More than 60 percent of all organic businesses with more than five employees reported an increase of full-time employment during 2016, and said they planned to continue boosting their full-time work staff in 2017. The organic industry continues to be a real bright spot in the food and agricultural economy both at the farm gate and checkout counter.

The Popularity of Produce and Protein

The \$15.6-billion organic fruits and vegetables sector held onto its position as the largest of the organic food categories, accounting for almost 40 percent of all organic food sales. Posting an 8.4 percent growth rate, almost triple the 3.3 percent growth pace of total fruit and vegetable sales, organic fruits and vegetables now make up almost 15 percent of the produce that Americans eat.

Across all organic food categories, shoppers are placing high value on freshness and convenience. In produce, grab-and-go salads and ready-to-eat veggies (fresh or frozen), have become top sellers.

In addition, sales of organic, protein-rich meat and poultry shot up by more than 17 percent in 2016 to \$991 million, for the category's biggest ever yearly gain. Continued strong growth in that category should push sales across the \$1-billion mark for the first time in 2017. Growing awareness of organic's more encompassing benefits over natural, grass-fed, or hormone-free meats and poultry is also spurring consumer interest in organic meat and poultry aisles.

Beyond Foods

Meanwhile, the OTA survey showed that today's consumers aren't just eating more organic, they're also using more organic products in their wardrobes, their bedrooms and bathrooms, and throughout their homes.

Sales of non-food organic products increased by almost 9 percent to \$3.9 billion. Organic fiber, supplements, and personal care products accounted for the bulk of those sales. Adequate supplies of organic textiles are a continuing challenge in the organic fiber market. However, U.S. organic cotton farmers produced a new record of 17,000-plus bales in 2016, which should help alleviate some supply concerns.


Increasing consumer awareness that what we put on our bodies is as important as what we put in our bodies is driving the growth in organic fiber sales, while a growing desire for transparency, clean ingredients, and plant-based products is spurring sales of organic supplements and personal care products.

You can purchase the full report at www.ota.com.

U.S. Organic Trade Data

Two years ago, OTA released a watershed report that compiled a comprehensive picture of the officially tracked organic food products sold by U.S. exporters and bought by U.S. importers. OTA, with researchers from Ohio State University and Penn State University, has now updated the study to analyze trade data spanning from 2011 through 2016.

These new figures reinforce the findings of the earlier report, and show that certain trends identified in 2015 have significantly strengthened. The United States remains the largest organic market in the world. Exports of U.S.-grown organic produce still account for the bulk of American organic exports, and continue to gain markets around the world. You can download the complete report at www.ota.com/tradedata.



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Organic Cannabis Certification?

As various states decriminalize or approve both medicinal or recreational cannabis, CCOF Certification Services is frequently asked to help ensure organic cannabis production. As an organization that envisions a world where organic *is* the norm, we would like to see cannabis production and processing meet organic standards. In fact, it is our understanding that the gray market nature of this production system has resulted in significant agricultural and chemical use issues.

Additionally, CCOF operations would like to consider cannabis or hemp as rotation, intercropping, or diversification options. An organic market and certification system for cannabis would offer incentives and ways to highlight the efforts of conscientious growers. In an effort to reduce conflict, CCOF will not decertify operations that grow cannabis on certified ground as long as they follow organic standards and provide full documentation and transparency, just as they would for any other crop.

At a federal level, cannabis and cannabis products remain classified as illegal drugs. Furthermore, the federal government has recently indicated an intention to aggressively enforce these laws.

As a certifier, we find ourselves in the middle of a states' rights versus federalism conflict. As a federal program, CCOF is accredited by the USDA National Organic Program (NOP), which is answerable to the Justice Department and federal law and policy. As a result, at this time, CCOF cannot issue a NOP certificate to any product that is not federally legal. As a

broad organization with many stakeholders, CCOF cannot risk negatively impacting all clients until the federal/state conflict is resolved or we receive clarification from the USDA.

Common questions include:

Will I be decertified if I grow cannabis on CCOF-certified organic ground?

No. CCOF Certification Services does not consider this crop to be a prohibited material. However, we cannot certify it or list it on your certificate. If you disclose all production methods and operate in compliance with your organic system plan, land used to grow cannabis may remain certified organic. This will support rapid listing of crops on certificates, should the matter be resolved, or should we receive instructions from the NOP allowing us to do so.

Can CCOF certify industrial hemp?

Maybe. The 2012 Farm Bill includes provisions for domestic production of industrial hemp under certain pilot or research programs. The NOP has established guidance that supports organic certification of hemp produced in compliance with farm bill criteria. There are some commercial registration programs nationally that may or may not meet the farm bill or NOP criteria. Because hemp is a potentially valuable rotation crop, CCOF supported a state law in California to allow production of industrial hemp, but it failed to pass. Moving forward, contact CCOF if you wish to produce organic hemp under farm bill research or pilot programs.

Can CCOF certify cannabis edibles or CBD?

No. Cannabis edibles or CBD oil remain classified as illegal drugs by the Justice Department. As such, we cannot provide USDA NOP certification.

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Improving Organic Standards

This year, CCOF is working with clients, the National Organic Program (NOP), and others to improve organic standards in a variety of ways. In addition to an ongoing focus on natural resources, we are working to improve a variety of areas to maximize confidence and ensure a level playing field for everyone. We will achieve this by a combination of focused inspections, testing, and modifications to systems or requirements. Our goal is to communicate with affected parties and give reasonable time frames for transition wherever warranted. As policies or efforts are finalized, we will publish them in Certification News on the CCOF website, in the newsletter, and through direct communication.

Potential upcoming changes to certification requirements or processes include:

- Improving oversight of at-risk imported grain shipments, currently corn, wheat, and soy from Eastern Europe, Turkey, and non-EU member states. Under this program, incoming shipments of organic grain must be identified and traced to certified growers in their country of origin. Visit www.ccof.org/imported-grain-update-2017 for more information. We expect this approach to be implemented by many certifiers and possibly as a national requirement.
- Clarification of NOP expectations regarding 120-day and 30 percent dry matter intake requirements for livestock. While 120 is a minimum for number of days on pasture, the standards require grazing to occur whenever possible and to be maximized throughout the year.
- A project in collaboration with Oregon Tilth to clarify requirements for non-certified brokers of animals and how slaughter stock is identified during sale, which will eliminate uncertified animal brokers while ensuring that ineligible dairy animals are not sold for organic slaughter.
- Adjustments to requirements to fully comply with the NOP's guidance regarding uncertified facilities and who must be certified. Handlers will be required to ensure that uncertified suppliers are fully exempt or excluded. Suppliers that handle, re-label, or otherwise mix or change loads may be required to seek certification. Over a reasonable time, we will request that handlers who utilize uncertified suppliers complete an assessment to ensure the operations are legitimately exempt or excluded from certification under the USDA National Organic Program.
- Expanded GMO testing. To follow up on some marketplace concerns identified by the California State Organic Program, we have expanded our GMO testing program in 2017. Our focus is primarily on animal feeds. We will be working with operations to identify the cause of any positive findings and ensure that appropriate efforts are in place to support organic integrity.



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