

Free lunch provided!



Vermont Organic Farmers Annual Producer Meeting

Monday, January 30th, 2023 from 10am-2pm

Royalton Academy Building
4182, VT-14, South Royalton

The annual meeting is open to all certified producers (farmers and processors) and those interested in organic certification standards. **It is important that certified producers attend this meeting and represent the interests of their operation in the certification process.**

Please RSVP by Jan 27th by emailing info@vermontorganic.org or calling our office at 434-3821.

Major Topics

- **New VOF Proposed Standard Clarifications:** The Review Committee has clarified VOF policies concerning specific NOP standards. These policies will be presented and discussed. These are listed in detail in the attached documents.
- **Budget Discussion & Fee Increase:** A certification fee increase to address cost of living increases and to address rising costs is being proposed. Because organic dairy farms are in crisis due to pay prices that do not support the cost of producing organic milk, there will be a solution presented to ensure dairies receive support for the cost increase.
- **Updates & Reports:** Come and hear important updates on the National Organic Standards, organic policy issues, and much more.

We Want Your Feedback!

Please complete our surveys to provide helpful feedback to inspectors and to help us make improvements to our certification program.

[Inspector Survey](#)



[Program Survey](#)





2023 Standard Proposals

Vermont Organic Farmers, LLC (VOF)

The USDA accredited certification agency owned by NOFA Vermont

802-434-3821 • info@vermontorganic.org • www.vermontorganic.org

January 11, 2023

The VOF Review Committee had five meetings in 2022 with VOF staff to discuss producer adverse actions and create new VOF policies. Each year, these policies are presented at the VOF Annual Producer's Meeting to gather producer feedback. We invite all certified organic producers to attend the meeting to vote on these standard interpretations and provide feedback on the VOF program in general. If you are unable to attend the meeting, please do not hesitate to contact the VOF office to express your opinion. The Review Committee discussed the following clarifications in 2022, based on new and continuing applicant questions and scenarios.

Note: Proposed standards changes are in **red**; old language has a ~~line through~~ it, if appropriate.

Standard Proposals

1) Water Used in Maple Syrup Production

Background:

There are a few instances in maple syrup production where water, not verified as potable, is used to clean equipment. For example, given the scale of some operations, it is not always possible to source water that has been verified as potable to clean remote sap collection equipment. In addition, producers condense steam (condensate) or use extracted water from concentrated sap (permeate) as wash water in their sugarhouses. Although these sources of water are considered potable, they are not available at the beginning of the season. Because of this, producers use water from sources not verified as potable to wash collection and storage tanks, filter presses and other equipment as necessary. Because the organic standards are not food safety standards, the Review Committee is proposing the following language to address these specific scenarios in a sound and sensible way.

Relevant Standards:

205.272 ~~Commingling and contact with prohibited substance prevention practice standard.~~

(a) The handler of an organic handling operation must implement measures necessary to prevent the commingling of organic and nonorganic products and protect organic products from contact with prohibited substances.

Section 2111 of the Organic Food Production Act states, "For an operation to be certified, the operation shall not, with respect to any agricultural product covered by this title (organic) use in such product water that does not meet all Safe Drinking Water Act requirements."

Proposal: (new language in red, bold)

II. PRODUCTION STANDARDS, E. Production Equipment, Methods, and Syrup Storage, Page 9

Sap Filtration and Reverse Osmosis Equipment:

Accepted:

Vermont Organic Farmers
PO Box 697 □ 14 Pleasant Street □ Richmond VT 05477 □ 802-434-3821
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- ~~New synthetic filters must be rinsed with potable water prior to use.~~

Syrup Production, Filtration, Storage and Processing Equipment:

Accepted:

- Storage containers and boiling equipment shall be made of food grade materials. ~~All syrup storage and boiling equipment must be washed and rinsed with potable water.~~

G. Washing and Disinfection of Equipment

It is required that all equipment be kept clean and free of traces of cleansing agents. Every time cleansing agents or disinfectants are used, filters, pans, seals, and tanks shall be rinsed thoroughly with ~~potable~~ water.

Water coming into contact with finished product or used as an ingredient in finished product must be tested every 2 years for both total coliform and E.coli to ensure potability. No documentation verifying potability is required if producers are using water from municipal sources or using condensed steam (condensate) or filtered water from reverse osmosis machines (permeate). Water from other sources (ex. well or spring) that comes in contact with the finished product must have documentation verifying potability every 2 years.

Equipment used for sap collection and transport does not need to be washed with water verified as potable. This is because sap is boiled to a minimum of 217 degrees F, therefore significantly reducing the risk of contamination from pathogenic bacteria.

In addition, it is understood that permeate and condensate may not be available at the beginning of the season, and tested water sources may not be available for initial cleaning (before the first boil of the season). VOF allows this practice given that the product is then boiled to 217 degrees F or packed at 185 degrees F, therefore significantly reducing the risk of contamination from pathogenic bacteria.

2) Backdating certification of poultry flocks

Background:

When new poultry operations apply for organic certification, the inspector is tasked with verifying that the birds have been managed organically from the second day of life. If a producer applies for certification of an existing flock, it is unclear how far back an inspector can verify this management. The Review Committee proposes that 6 months is the maximum amount of time an inspector can verify, through records, whether a poultry flock qualifies as organic.

Relevant Standards:

205.403 On-site inspections.

(b) Scheduling. (1) The initial on-site inspection must be conducted within a reasonable time following a determination that the applicant appears to comply or may be able to comply with the requirements of [subpart C of this part](#). Except, That, the initial inspection may be delayed for up to 6 months to comply with the requirement that the inspection be conducted when the land, facilities, and activities that demonstrate compliance or capacity to comply can be observed.

(c) Verification of information. The on-site inspection of an operation must verify:

- (1) The operation's compliance or capability to comply with the Act and the regulations in this part;
- (2) That the information, including the organic production or handling system plan, provided in accordance with [§§ 205.401, 205.406](#), and [205.200](#), accurately reflects the practices used or to be used by the applicant for certification or by the certified operation;

Proposal: (new language in red, bold)

VI. ORGANIC LIVESTOCK PRODUCTION, A. Origin of Livestock (205.236), Page 63

Origin of Livestock (§205.236)

3) Poultry

Poultry intended for slaughter or egg production must be under continuous organic management beginning no later than the 2nd day of life. For producers who want to certify adult layer flocks, the Review Committee will evaluate individual cases only if the producer can provide the following records: grain slips, health or mortality records, estimates of amount of grain fed, and number of birds. All records must document organic management from the 2nd day of life to present. **VOF will only review records up to 6 months prior to the initial inspection and therefore, will not certify any poultry older than six months of age at the time of inspection.**

Other items to be voted on by the membership

1) Certification Fee Increase

Certified producers will vote on a certification fee increase. This fee increase will help support staffing and program cost increases as well as an upcoming NOP Audit. The proposed fees still maintain VOF's rates as less expensive than either MOFGA and NOFA NY. We continue to work towards addressing capacity issues to allow certification specialists more one-on-one time with producers to help ensure success with certification paperwork and practices. Because of the particular crisis on organic dairy farms due to pay prices that do not support the cost of producing organic milk, there will be a solution presented to ensure our struggling organic dairies are minimally impacted with any fee increases this year.

2) VOF Review Committee & EC Committee Members

Certified producers will vote on the members of the Review Committee and Executive Committee.

Important Regulation Updates

1. National List Changes

On 2/28/22, the National List was amended to prohibit fourteen nonorganic ingredients, which are currently allowed in the manufacture of organic processed products. The rule also prohibits two substances (vitamin B₁ and procaine), which are currently allowed in organic crop and livestock production. The compliance date for the amendments that remove vitamin B₁ and procaine from the National List is March 15, 2023. **This means that after 3/15/23, farmers must no longer use vitamin B1 in crop production or procaine in livestock production.** The compliance date for all other amendments that remove substances from the National List is March 15, 2024. **This means that after 3/15/24, processors must stop using the following nonorganic ingredients:**

- Alginate acid

- Colors (black currant juice color, blueberry juice color, carrot juice color, cherry juice color, grape juice color, paprika color, pumpkin juice color, turmeric extract color);
- Kelp
- Konjac flour
- Sweet potato starch
- Turkish bay leaves
- Whey protein concentrate

2. **“Transitioned” Animals May Not be Sold as Organic**

On 4/5/22, the USDA published a final rule amending the requirements for the origin of livestock, closing a long-standing loophole that allowed producers to continually transition conventional animals to organic production. This rule specifies that organic milk and milk products must be from animals that have been under continuous organic management from the last third of gestation onward, with an exception for newly certified organic livestock operations. **In order to firmly close the loophole, the new rule contains the provision that organic operations cannot sell transitioned animals as organic.** Some small businesses may be granted limited exceptions by the AMS Administrator. For example, if a certified operation wishes to conduct an intergenerational transfer of transitioned animals to an immediate family member, a certifying agent must request a variance on behalf of a certified operation, in writing, to the Administrator within ten days of receiving the request of variance from the operation.

3. **Organic Seed Usage**

All organic producers must use organic seeds, annual seedlings and planting stock unless organic varieties are not commercially available. During the annual review and inspection, certification staff and inspectors must verify that certified operations use organic seed varieties and that conventional, untreated seed is used only in instances where organic seed cannot be sourced. Producers using conventional seed, must document the search for organic seed by recording at least three sources that were contacted/used in this search.

4. **Paper Pot Review- Paper Planting Material**

On 12/14/22, the National List was amended as follows.

- Paper-based crop planting aids added to §205.601 as an allowed synthetic production aid.
 - Materials must be virgin or recycled paper without glossy paper or colored inks and must meet the definition of “paper-based crop planting aid.”
 - *Paper-based crop planting aid.* A material that is comprised of at least 60% cellulose-based fiber by weight, including, but not limited to, pots, seed tape, and collars that are placed in or on the soil and later incorporated into the soil, excluding biodegradable mulch film. Up to 40% of the ingredients can be nonsynthetic, other permitted synthetic ingredients in § 205.601(j), or synthetic strengthening fibers, adhesives, or resins. Contains no less than 80% biobased content as verified by a qualified third-party assessment (e.g., laboratory test using ASTM D6866 or composition review by qualified personnel).

This new addition to the National List of paper-based planting aids formalizes a temporary allowance wherein operators could use paper-chain pots or other similar products. VOF will begin the process of reviewing these materials in early 2023 and will contact producers to request additional information to complete reviews or to notify producers when reviews are complete.

5. **Application Due Date Changes**

In an effort to complete more inspections during the growing season and to encourage producers to complete applications before the growing season begins, VOF is updating the organic application due dates for 2023.

- **January 15th is the deadline for Maple producers.**
- **March 15th is the deadline for Crop and Livestock producers.**
- **June 15th is the deadline for Processor/Handlers.**



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January 11, 2023

Greetings,

We hope you are having a wonderful winter and holiday season. We are writing to let you know about the collaborative work that has been happening between VOF and Real Organic Project (ROP) over the past several years. VOF and many of its farmers were instrumental in helping to launch the farmer-led, add-on label managed by ROP in 2018. Since then, 100+ VOF certified farms and over 1000 certified organic operations nationally have become ROP certified.

ROP works only with NOP certified farms to verify that they are operating within the letter *and* the spirit of the organic standards. ROP certified farms are required to grow their crops in healthy, biologically active soil and raise their animals with meaningful access to pasture. This is in opposition to the growing trend of our supermarket shelves being stocked with "certified organic" hydroponic produce and meat, milk and eggs from confinement operations. Importantly, ROP operates as an add-on so it can help uplift and strengthen, instead of compete with, the USDA certified organic program.

VOF has always operated with strength and passion towards maintaining the integrity of the organic standards, but does not exist in a bubble. Weaknesses in organic enforcement and integrity in other parts of the country inevitably affects the ability of VOF farmers to access shelf space and fair prices. In addition, these issues affect how consumers think about and trust the USDA Organic seal we all rely on to communicate confidence in the products we grow and sell.

It is the mutual goal of VOF and ROP to maintain the decades of hard work many of you have put into the USDA Certified Organic program. While both of our organizations don't agree on everything - we feel strongly we can have a greater impact working together towards the goals we agree on while respecting our differences on goals where we do not.

If you are interested in learning more about ROP feel free to contact ariel@realorganicproject.org or fill out their no-cost application at realorganicproject.org/apply. If you want to hear more about our shared goals and how VOF and Real Organic Project collaborate, contact nicole@vermontorganic.org.

Sincerely,

Nicole Dehne
VOF Certification Director

Ariel Pressman
Real Organic Project Director of Certification



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