



## 2026 Standard Updates & Discussion Items

VOF values the voices of our certified producers and we work hard to make sure that our organization is producer-driven. This past year, our Review Committee, made up of five certified organic farmers and processors, created policies based on thoughtful interpretations of the USDA National Organic Program Rule. These interim policies were then discussed and voted on at our Annual Producer Meeting held in Richmond, VT on January 16th. We want to thank those producers who were able to take time from their busy schedules to attend the meeting. It is vitally important that producers send a representative to the meeting to vote on standards interpretations.

If you were not able to attend, please consider sending a spokesperson in the future to represent your business's interests. Annual Meeting minutes are available upon request by calling the VOF office.

### Standard Updates

#### 1) Pet Food & Mushroom Standards

##### Background:

The final rule for organic mushroom and organic pet food production became effective on March 21, 2025. The rule requires that all mushroom spawn and mushroom substrate that has not been composted be organic, unless a functionally equivalent organic material is not commercially available. This includes any agricultural substrate materials that are pasteurized or sterilized. Pets are now clearly defined, and the making of organic pet food must meet all current food processing requirements in the rule. Taurine was added to the National List as an approved ingredient in pet food. Organic operations must comply with the requirements of this rule by March 22, 2027. VOF will provide more updates about these changes in 2026. Learn more [here](#).

### Standard Proposals & Voting Items

#### 1) Non UVA Forest Management Plan Reviews

##### *Proposal Passed*

*(17 yes, 0 no, 0 abstentions)*

##### Background:

VOF's Maple Guidelines require that all FMPs are signed by county foresters ensuring that they meet Use Value Appraisal (UVA) Program criteria. This is problematic for producers not enrolled in UVA. Historically, county foresters would review these plans despite those land owners not being enrolled in the UVA program. However in 2025, we were notified that the county foresters no

longer felt comfortable reviewing and signing off on non-UVA enrolled FMPS. Therefore the following policy change is recommended.

Proposal: (new language in red, bold)

11. PRODUCTION STANDARDS, B. Certification Requirements, Page 2.

A written forest management plan is required for each property used for maple sap collection. Forest management plans must meet all components and practices as required by the Vermont State Use Value Appraisal (UVA) Forest Management Plan Template and Sugarbush Management Standards for the UVA Program dated October 8, 2014 and must bear the signatures of the preparer (for example, consulting forester), land owner and county forester. Forest management plans written before March 1, 2016 must include components and practices as required by the Sugarbush Management Standards for the UVA Program dated October 8, 2014 when amended or when they expire. UVA requires that active management take place based on the current conditions of the stand. Applicants with properties not enrolled in the UVA program must still meet the above requirements ~~but should call the VOF office to discuss the county forester signature requirement.~~ **except that the forest management plan does not need to bear the signature of the county forester. Instead the forest management plan and Use Value Appraisal Management Plan Checklist must be signed by a licensed forester.** Plans expire after 10 years based on the date the forest inventory data was collected. In order to keep their certification in good standing, producers need to submit an updated plan with current data. When a plan is amended less than 10 years after the forest inventory data was collected, a copy of the amended plan with new signatures from the preparer (for example, consulting forester), land owner and **(if applicable)** county forester will be required.

2) Calculating Basal Area

***Proposal Passed***

**(15 yes, 0 no, 2 abstentions)**

Background:

VOF currently requires that producers meet the UVA FMP guidelines. However, our requirement to exclude damaged trees when counting residual basal area, conflicts with how UVA calculates basal area. This is concerning some county foresters who feel that they can't approve plans with this conflicting requirement.

Proposal: (striked language)

11. PRODUCTION STANDARDS, B. Certification Requirements, Section 3(g), Page 3.

3) In addition to UVA plan components VOF requires the following management practices. A written description of how these management practices will be met must be included in the forest management plan or in a separate addendum.

g. Residual Stand Damage

- During thinning or harvest, damage to remaining trees must be minimized or avoided.

- ~~• Trees with 20% or more harvest-imposed damage must not be considered acceptable growing stock, and must not be counted in the residual basal area.~~

### 3) Lead Testing

*Proposal Passed*

*(15 yes, 0 no, 2 abstentions)*

#### Background:

This summer, the Vermont Agency of Agriculture, in collaboration with the Department of Health, adopted a new risk-based recommendation for lead levels in maple syrup. The recommendation is based on EPA modeling using the Integrated Exposure Uptake Biokinetic (IEUBK) Model for Lead in Children, along with EPA food consumption estimates derived from the National Health and Nutrition Examination Survey. The agencies concluded that there is no safe level of lead in maple syrup and that, based on current laboratory capabilities, the lowest reliably reportable level is 6 ppb. To protect children's health, the Department of Health now recommends that maple syrup contain no more than 6 ppb of lead. As a result, the Agency no longer supports the historical guidance level of 250 ppb.

Proposal: (striked language)

#### III. RESIDUE TESTING, Page 14.

The VT Dept of Health and the VT Agency of Agriculture recommend that maple syrup contain no more than 6 ppb of lead. This is an adjustment from the earlier recommendation of 250 ppb. Therefore, lead-containing equipment is prohibited for use in organic production. All lead-containing equipment used in the production, processing, storage, or handling of organic maple syrup must be permanently removed from use no later than December 31, 2027. This allows a two-year transition period to give producers sufficient time to identify, replace, or retrofit equipment as needed. If replacing equipment is a significant barrier, producers may submit a request for an extension to the VOF Review Committee for consideration. Producers with samples that test above the 6ppb ~~If an operation uses galvanized buckets, they will be asked to provide documentation that the lead equipment is not contaminating the organic syrup. Any syrup with lead levels above 250 ppb cannot be sold as organic. Producers with samples above the 250 ppb recommended lead level must reassess their management and equipment and submit proposed changes in writing to the VOF Review Committee. Certification continuation or renewal will depend upon the implementation of this proposal and a new lead test showing levels below 250~~ no more than 6 ppb.

#### II. PRODUCTION STANDARD, E. Production Equipment, Methods, and Syrup Storage

In both sections:

Sap Collection and Storage Equipment: Page 9

Syrup Production, Filtration, Storage and Processing Equipment: Page 11

Accepted:

- Existing galvanized buckets provided that producers submit annual lead tests. Producers must purchase non-galvanized buckets for replacement purposes. Stainless steel buckets and equipment are encouraged. **Galvanized buckets are not allowed after December 31, 2027.**
- ~~All new equipment must have lead-free solder to prevent lead contamination. The intention of all producers should be to move away from equipment (especially pans where the sap is cooked) that contains any lead.~~ **All lead-containing equipment must be permanently removed from use no later than December 31, 2027. Until this date,** Producers that have equipment that may contain lead must submit annual lead tests. For example, bronze gear pump, uncertified brass fittings, copper preheaters, etc.

## **Other items to be voted on by the membership**

### **1) VOF Review Committee & Executive Committee Members**

*All Members Reelected*

*(17 yes, 0 no, 0 abstentions)*

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

## **Discussion Items**

### **1) Risk Based Certification**

As part of organic agriculture's commitment to continuous improvement, farmers, inspectors, and certifiers are reexamining whether the certification process itself can better protect integrity without creating unnecessary burden. Recent rule changes have strengthened fraud prevention but also increased paperwork and inspection demands, prompting discussion about more risk-based or scale-appropriate approaches for low-risk or long-certified operations. While concerns about fairness and consumer trust remain, VOF believes progress depends on engaging farmers directly to ensure certification stays efficient, meaningful, and trusted. Participate in a listening session around this topic to provide feedback on how to improve this process!

### **2) Panel Discussion on Innovative Ways to Support the Next Generation of Organic Farmers**

Come hear from a panel of three farms sharing experiences and insights about supporting new organic farmers. Panelists will discuss what helps beginning farms succeed, the challenges they face, and ways the farming community can provide meaningful support.

## **Important Information!**

### **1) Cost Share**

Although the Organic Certification Cost Share Program has been funded, those funds are not yet available to organic producers. The federal budget reconciliation bill provides \$8 million per year for the next 10 years for the National Organic Certification Cost Share Program, along with an additional \$1 million in Agricultural Marketing Assistance (AMA) funds; however, this funding level may still be insufficient to fully meet program demand. The most recent update indicates that USDA's Farm Service Agency (FSA) plans to release a Notice of Funding Opportunity and a final rule for the 2025 and 2026 cost share programs this spring, though application details remain unclear. VOF anticipates that funds will become available in 2026 and will work closely with FSA and the Vermont Agency of Agriculture to support a smooth reimbursement process. In the meantime, NOFA, VOF, and partner organizations continue to urge FSA and Congress to elevate this program as a funding priority.

### **2) Drought Variance**

Due to drought conditions during the 2025 growing season, VOF requested a variance from the National Organic Program exempting producers from meeting the pasture rule in all Vermont counties except Franklin and Grand Isle. This variance aligns with USDA's Secretarial Natural Disaster Designation for the state. Even if you previously communicated with the VOF office or your inspector, producers who did not meet the pasture rule in 2025 should contact the VOF office to discuss their situation.