

OREN WELCOMED GUESTS AND ROUNDTABLE INTRODUCTIONS.

In Person: Keith Speltz, NFOrganics member; Ted Weydert, Northern Illinois Soybean Processing; Patti Burstern, Accreditation Auditor USDA; Alexis McInerney, NOP USDA; David Glasgow, Associate Deputy Administrator for National Organic Program (NOP), USDA; Kevin Kiehn, Organic Valley; Steve Walker, NOP; Emily Prisco, NOP; Andrea Holm, NOP; Anne Ross, Cornucopia Institute; Melody Morrell, Cornucopia Institute

Zoom: Ed Reznicek CPOF GM – CPOF member; Tom Wanquist, CPOF MARKETER DeEtta Bilek, OFARM Office Manger; Will Ortman, OFARM Treasurer; Jim Hayes, NFOrganics member.

National Organic Program USDA, DAVID GLASGOW GUEST SPEAKER: They organization is arms for national organic regulations; funding; audits to accreditors that certify farmers. Slide presentation. Starting process targeted surveillance for fraud. Starting in India with 2 audit teams; residue sampling included. Now implementing SOE rule. They hosted a Zoom slide presentation and ran out of allowable audience participation with more than 1,000 viewers. Slides available on-line. He stated OFARM was crucial in helping move SOE to implementation stage. Thanks OFARM and Marbleseed in partnership with TOPP.

NOP Team: each gave a description of what they do: Alexis McInerney, Patti Burstern, Andrea Holm, Emily Prisco, and Steve Walker.

Alexis McInerney, Program Analyst, NOP. Provides administrative support, develops standard operating procedures, assists with various communications pieces, and provides guidance to Customer Service team who respond to stakeholder inquiries and support NOP's expanded team of 80+ employees with day-to-day requests.

Patti Burstem NOP, from Wisconsin. Accreditation Auditor. Presented her journey to her current position.

Andrea Holm, Materials Specialist in the Standards Division. [National List](#) explanation. Updated the website that contains petitions & technical reports (the [Petitioned Substances Index](#)). Technical reports are written by 3rd parties. She reviews petitions and technical reports, and writes regulations. Helps Michelle Arsenault with [National Organic Standards Board](#) (NOSB) public meetings, for which they read and categorize all public comments to the NOSB. Encourages everyone to submit public comments to the NOP for National List Proposed Rules (Sign up to receive [Organic Insider](#) updates). Check out the [Organic Integrity Learning Center](#) (OILC) for a short segment on how to submit an effective public comment (OILC: Microlearning "Writing an Effective Comment" and "NOP-300: NOP People, Processes, and Policy")

Emily Prisco, Frederick, CO – NOP with 3.5 years now with extensive organic background. Compliance and Enforcement Division which is broken into 2 grps, 1) focuses on complaints; 2) strategic initiatives which she is on. Looks at industry trends. Performs unannounced audits mainly livestock team. Learned that certifiers were using different processes, so they started educating certifiers. The unannounced audits are a result of the NOP's surveillance program to ensure the organic regulations are implemented similarly across operations by certifiers.

Steve Walker – Compliance and Enforcement Division – gave his background; works with Emily on Strategic Initiatives Team; looks at trends and risks and determines compliance; handles over 900 inquiries annually; communicates to organic organizations and individuals pertaining

to complaints/inquiries; talked about a few successes. Is Question from audience: there any funding and/or assistance for transitional farms? They help them meet their goals; statements to the public.

LUNCH: 12:30 – 1:00

Reconvened: additional attendees: Lori Stern, Director of Marbleseed; Tom Manley, Marbleseed Virtual: Abby Youngblood, National Organic Coalition; Tim Baalman, CPOF Board President; Ed Reznicek, CPOF General Manager; Julia Barton, Organic Policy Specialist with OEFFA; Alyssa Hartman, Executive Director of Artisan Grain Collaborative; Bruce Shultz NFO Board President

Continuation of NOP Q&A

We appreciate OFARM being a partner in the Transition to Organic Production program. This \$100 million investment by eth Administration is unprecedented and will impact a whole generation of transitioning and organic farmers.

Another part of the Organic Transition Initiative is an additional \$100 million that USDA's Risk Management Agency is using to make crop insurance work better for organic practices and needs and, the USDA Natural Resource Conservation Service is also using part of this funding for a new program that helps recognize and reward the good climate-smart work organic producers are already doing.

Farm Bill funding: NOP appreciates the role OFARM played in generating support for organic production in the last Farm Bill. Our role is to accomplish what Congress and the Administration direct and provide data and information to them when asked.

Question on imports - is NOP aware that grain/oilseed imports are being "reflagged" and coming in circuitously? – Yes. We are aware this happens and our team actively scrutinizes import data for spikes and other signals that raise questions about a shipment or shipments, or about a particular country or region. We are working more closely with Canada and the EU to share info information so all of us know when specific concerns, like residues or GMOs, are uncovered. We now have a full-time person sitting at Customs and Border CTAC operation center who can access data and team members from other federal enforcement agencies when researching import and trade data. We have three staff members who work directly with the equivalency agreement countries and the Foreign Agricultural Service, which also helps raise awareness of trends and issues that our Compliance and Enforcement Division's Strategic Initiatives team need to target next.

How quickly are import certifications entered into the system? One of the provisions in the Strengthening Organic Enforcement rule is that all imports coming into the United States must be associated with an electronic organic import certificate, called the "NOP Import Certificate." The Import Certificate provides faster traceability and auditable record trail. Once SOE is implemented, NOP will be able to use a new electronic Import Certificate module in the USDA Organic Integrity Database (OID) to verify that shipments imported into the U.S. are certified organic, since every organic shipment will need to be associated with an NOP Import Certificate number. NOP will be able to validate shipments with the CBP ACE system (the "automated commercial environment" computer system that all incoming imports already use) and see the additional shipment data – but that information is limited to NOP only. However, based on requirements in the 2018 Farm Bill, NOP plans to develop and regularly publish reports that include aggregated country and commodity level data for organic imports. Once data begins to flow, we will have a better sense of the extent and frequency of those reports. While many Harmonized Tariff Schedule (HTS) codes already exist in ACE, the new

electronic Organic Import Certificates will help us identify additional high volume and high value organic imports, which will support new organic HTS codes as needed over time. Aggregate information for shipments under existing organic HTS codes is currently available from the Foreign Agriculture Service, through the Global Agriculture Trade System. USDA Market News provides price, volume, and other related information for commodities and products that have been grown, processed and certified to the USDA organic standards, including imports with organic HTS codes.

Question on residue sampling, specifically what kind of testing does NOP do/require: When suspect shipments are identified, NOP now has the ability to work with CBP to hold and sample the product for testing at a USDA lab or other certified third-party lab as needed under the circumstances. These labs are capable of doing whatever test is needed depending on the circumstances. We don't share details on specific enforcement actions to avoid encouraging someone to try to get around us.

Is there a source where OFARM can get information on questionable imports? The USDA Foreign Agricultural Service GAIN reports provide collect and regularly report available data by country. The USDA | AMS Transportation & Marketing Program also publishes price data for a wide range of organic products. They are also expanding coverage. The data is free on the USDA Market News website.

How does NOP work with the Office of the Inspector General: When evidence of criminal activity is uncovered, NOP staff work with the USDA Office of General Counsel and OIG to review and refer cases that have a significant market impact for criminal investigation and prosecution. When it won't jeopardize the criminal case, NOP also moves ahead quickly to get the entity out of the organic market ASAP. When appropriate, cases are turned over to the Department of Justice and taken to a Grand Jury and ultimately prosecuted in criminal court. NOP staff and staff from all these agencies now provide cross-training and work together regularly to build cases that hold up in court, get bad actors out of the organic market and deliver punishment that discourages others from entertaining fraud.

Strengthening Organic Enforcement final rule: Deadline to be in compliant is March 2024, don't wait, read the rule and work with your certifier now to identify changes needed for your operation. One example is that all Organic Systems Plans will be required to include an explanation of what you're doing to prevent fraud in the system. Farmers have 13 months left to determine what that will look like. A small organization's plan will likely be much simpler than the one needed for a large or more-complicated operation, like when an operation grows or handles both organic and conventional. Importers and processors buying grain from overseas will be impacted by the new electronic organic import certificate requirements, and there are many more provisions in the rule that should be reviewed with your certifier. We are adding training and resources the USDA Organic Integrity Learning Center. OFARM can help their producers and coops by helping them start now reviewing and adjusting plans and processes to meet the new requirements.

Will NOP make it possible to certify grazing goats since there grazing needs are so different from ruminants Last summer NOP held a listening session on organic community priorities and is focused on those right now – OOL, SOE, OLPS and inert ingredients were identified as high priorities. Anyone can petition the NOSB to consider other topics and there are two open comment periods leading into the board meetings every year.

How is it possible for large operations to meet grazing requirements for cows: The regulations were written to allow anyone who can demonstrate they meet the rules to be certified. Our

Livestock Surveillance Project started several years ago to look into this question. We use short notice and unannounced visits and target operations with risk factors that include herd size, regional challenges like water availability, and past compliance issues, among others. Where we find non-compliances, the certifier works to get the operation into full compliance or to get them out of the organic market as quickly as due process allows. The Origin of Livestock final rule goes into full effect in March and clarifies the rules on how herds are managed to ensure everyone is working from the same rulebook. Heartfelt thanks to all NOP staff.

2:30

National Organic Coalition, Abby Youngblood presentation via Zoom: The focus of the National Organic Coalition is to protect the organic seal. NOC does research, education, and advocacy. OFARM is a long-standing partner. The NOC represents farming organizations, consumers, retailers, certifiers. What's new – they are 20 yrs. this year. Also celebrating that they are now an independent non-profit organization. Progress from last year: finalizing SOE and OOL rules; creation of new \$300 million organic transition initiative at USDA; focus for this year: getting Organic Livestock and Poultry Standards rule finalized, providing support to organic dairy producers in crisis, advancing organic in the farm bill negotiations. Plea to everyone – many of you have a member of congress on the House or Senate agriculture committee. Please communicate to them to support organic in the farm bill; Abby extended the invitation to engage in the process at the National Organization Standards Board and participate in the Spring national meeting in Atlanta, GA in person or in zoom.

OEFFA, Organic Policy Specialist Julia Barton presentation via Zoom: Ohio Ecological Food and Farming Association: 43 yrs old this year. Founded by 4 farmers 43 years ago. They advocate for a sustainable food system, through education & advocacy through groups like OFARM. Climate Smart Ag work; many changes and growth over last year. New Executive Director, Rachel Thaze(?). She is new to position but not new to OEFFA. Also, a new Program Director, Sasha Sajetick(?). They also grew the transition educators; the policy team has grown to 4 staff; they have work group for each bill: crop insurance and work grouping NOFP meeting in Atlanta. There is a Fact Sheet on how to help folks, she'll send one; have a partnership with Central State University in Ohio to help farmers, researchers and educators well before a grant is due. They welcome anyone to join a work group via Zoom. 2 new staff Erica Powell and August Taylor; agricultural justice program; certification program kicking off; thanked OFARM for partnership for fraud research.

Cornucopia, Melody Morrell, Executive Director and Anne Ross, Organic Investigator of The Cornucopia Institute: Cornucopia is 19 yrs old. They are currently working on an updated Organic Egg Report and Scorecard that primarily is focusing on educating consumers about organic egg brands. They will increase efforts in co-ops and retailers to reach more consumers; more investigation behind the scenes. Anne will travel the country investigating and verifying organic farm practices. Fraud is not over and everyone needs to be diligent. They will continue on policy efforts. Asking for people to cooperate and contact Cornucopia on any changes on farms or in the marketplace due to the Strengthening Organic Enforcement Rule. Question from the group: what level of enforcement do they have? Answer: They don't have a level of enforcement. They're simply investigative and reporting. They have bi-weekly news and quarterly newsletters; to subscribe go to: Cornucopia.org.

Marbleseed: Lori Stern, Director & Tom Manley, Program Director – Lori: Many things new this year starting with their name change to Marbleseed, new logo, working much with OFARM; will have a

farm bill platform this year, trying to build momentum and collaborating with other organizations. New program this year through the Local Food Purchase Assistance Program in WI. Contracting with 170 farmers getting \$1.5M that includes pre-season funding. Putting their efforts generally on resourcing farmers directly. Living and building a healthy planet and healthy people; land access. Tom: role changes being funded through collaborative agreement trying to remedy the disconnect between organic and conservation programs, to increase utilization of NRCS by organic and transitioning farmers. Understand what the organic rules look like; new guidance, rules and resources for NRCS staff, TSP's and farmers to make sure they are being awarded for good stewardship. Lori: trying to work in collaboration to build a platform for farmers' voice and engagement. Marbleseed, in collaboration with other allied organizations, created the Ag Solidarity Network. It is a platform that functions like Facebook (without the ads and data stealing) that will enable farmers across the organic community to connect and organize. Leon: note to OFARM that Marbleseed is CSAF grant partners along with OFARM and OEFFA. Marbleseed is lead on the CSAF grant.

Organic Valley (OV) Kevin Kiehna: The biggest news is that they have a new CEO who started 3.5 mos ago: Jeff Frank from Hormel Foods; milk prices increased to .75 in the Midwest in 2022; across the co-op .25 in 2022; this year a .50 increase across the co-op to help producers stay afloat. Utilization is balanced. We are now bringing on new members and this is exciting – recruiting for new milk normally begins in the east because this is ware, we see shortages first. He has seen some production loss mainly because of feed cost increases; EOY feed program not intended to be profitable but break even. Question from audience: do you procure for your feed or all internal? Some procurement but they help match producers with growers. They will sell member commodities to non-members. OFARM offered help in finding feed if they need it.

Artisan Grain Collaborative, Alyssa Hartman, Executive Director: Harry Bennett invited her to introduce Artisan Grain to OFARM – They are the new kids on the block. Alyssa is the first FT staff and Executive Director of Artisan: they focus organic culinary grains and her job is to bring together folks from farms, end-user, researchers, advocates and others who work together for food grain in upper Midwest and make sure they are connected and have resources and provide support for food grade grain and culinary grain users such as bakers. She also helps to identify and reduce friction points. Alyssa started in the Chicago area and wanted to source regional grain for bakers and culinary specialists; finding ways to help farmers find use for their grains; food grade grain and helped facilitate conversations between the food grade grains small food & beverage industry productions rather than large. Publication also; membership is free. AGC is grant-funded so she does a lot of grant writing as well. Members include researchers, farmers, cleaners, millers, brewers, distillers, bakers, distributors, Marbleseed, breeding programs from universities, etc.

Comment from Leon: climate smart grant and part of that required to put a market development community and he would like to invite AGC to be a part of that. Question from audience: what is her vision of volume within the next 2-3 years? She doesn't anticipate changing the field use for the grains for breads but sees more production of other grains such as millet, barley, etc. Conversation on packaging – depends on the request.

Meeting adjourned 4:13 pm