



# Vermont Organic Farmers Annual Meeting

Thursday, January 23rd  
10:00am-2:00pm

## Agenda

- 10:15 – 10:30      Welcome & Introductions  
Nicole Dehne: Certification Director
- 10:30 – 11:30      VOF Standard Proposals & Clarifications  
Nicole Dehne: Certification Director  
Action: Vote on 150 Day Grazing Season Language  
Action: Vote on Swimming Pool Filters Update  
Action: Vote on Policy for Certifying New Beef Operations  
Action: Vote on Container Growing Language  
Action: Vote on Review Committee & Executive Committee
- 11:30 – 12:00      2020 Proposed Budget (with 3% base fee increase- \$15)  
Nicole Dehne: Certification Director  
Action: Vote on 2020 Budget
- 12:00 – 12:30      Policy Updates & NOFA Report  
Grace Oedel: NOFA-VT Executive Director  
Maddie Kempner: Policy Advisor (Policy Update)
- 12:30 – 1:00        Lunch (*organic and local food provided by Stones Throw Pizza*)
- 1:00 – 1:30        Bylaw Changes  
Nicole Dehne: Certification Director  
Action: Vote on Proposed Changes
- 1:30 – 2:00        VOF Program Report  
Laura Nunziata: Operations Manager  
Gregg Stevens: Senior Certification Specialist (2019 Statistics & 2020 Growth Projections)



## 2020 Standard Proposals & Updates for Organic Producers

Vermont Organic Farmers, LLC (VOF)

The USDA accredited certification agency owned by NOFA Vermont

VOF Office: 802-434-3821 vof@nofavt.org www.nofavt.org/vof

The VOF Review Committee, comprised of five certified producers, had two meetings in 2019 with VOF staff to create new VOF policies and to discuss producer adverse actions. Each year, these policies are presented at the VOF Annual Producers Meeting to get producer feedback and review. This year the meeting will be held at the Free Public Library in Richmond, VT. We invite all producers to attend the meeting and provide us feedback regarding these standard interpretations and the VOF program in general. If you are unable to attend the meeting, please do not hesitate to contact the office to express your opinion. The Review Committee discussed the following clarifications in 2019, based on new and continuing applicant questions and scenarios.

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

### Standard Proposals

#### 1) 150 Day Grazing Season

##### Background:

In 2018, based on guidance from the NOP, producers at the Annual Meeting voted to approve 150 days as a "typical" grazing season in Vermont. Since then, there has been some concern that managing strictly for number of days could result in overgrazed pastures. The Review Committee added emphasis to the existing language to clarify that the priority of pasture management practices should be ensuring soil health.

##### Relevant Standards:

§205.2 Terms defined.

*Grazing season.* The period of time when pasture is available for grazing, due to natural precipitation or irrigation. Grazing season dates may vary because of mid-summer heat/humidity, significant precipitation events, floods, hurricanes, droughts or winter weather events. Grazing season may be extended by the grazing of residual forage as agreed in the operation's organic system plan. Due to weather, season, or climate, the grazing season may or may not be continuous. **Grazing season may range from 120 days to 365 days, but not less than 120 days per year.**

§205.240 Pasture practice standard.

(c) A pasture plan must be included in the producer's organic system plan, and be updated annually in accordance with §205.406(a). The producer may resubmit the previous year's pasture plan when no change has occurred in the plan. The pasture plan may consist of a pasture/rangeland plan developed in cooperation with a Federal, State, or local conservation office: Provided, that, the submitted plan addresses all of the requirements of §205.240(c)(1) through (8). When a change to an approved pasture plan is contemplated, which may affect the operation's compliance with the Act or the regulations in this part, the producer shall seek the certifying agent's agreement on the change prior to implementation. The pasture plan shall include a description of the: **(3) Grazing season for the livestock operation's regional location.**

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Date Created:

Date Revised:

§205.237 Livestock feed.

(c) During the grazing season, producers shall: (1) Provide not more than an average of 70 percent of a ruminant's dry matter demand from dry matter fed (dry matter fed does not include dry matter grazed from residual forage or vegetation rooted in pasture). This shall be calculated as an average over the entire grazing season for each type and class of animal. **Ruminant animals must be grazed throughout the entire grazing season for the geographical region, which shall be not less than 120 days per calendar year.** Due to weather, season, and/or climate, the grazing season may or may not be continuous.

Proposal: (new language in red, bold)

B. Livestock Living Conditions D. Pasture Requirements, Pages 61-62

The climate in Vermont does not permit grazing for 12 months. Debate exists over the period which can be considered the grazing season months in Vermont and the determination depends on specific situations, including available forage types and management strategies. In order to calculate the average length of the grazing season it is logical to eliminate the months during which grazing does not occur. The probability of occurrences of inclement weather conditions is high in December, January, February, and March; these months are also characterized by average monthly temperatures too low to support plant growth. Grazing during this 4-month period would not be dependable. The active growing season for perennial plants is from about mid-April to mid-October. The more typical/dependable grazing season in Vermont is from about mid-May to mid-October. Therefore, a typical/dependable grazing season in Vermont is at least 150 days. **Good pasture management prioritizes the health of soil and plants, which in turn promotes animal health and profit. All pasture management should bear soil health in mind. Although a 150-day grazing season is typical in Vermont, producers should use a 150-day grazing season as a guide, rather than an arbitrary number of grazing days. Care should be taken not to prematurely graze, damage plants due to saturated soils, drought, or fall overgrazing. A minimum of 30% of dry matter intake from pasture will be calculated by averaging the number of days grazing which should be at minimum 120 days.**

## 2) Swimming Pool Filters Update

Background:

Maple producers often use swimming pool filters for filtration of sap. In order to ensure that the swimming pool filters cannot contaminate the organic product, the current maple guidelines include a requirement for "food-grade" sand. However, food grade sand does not technically exist. Therefore, the Review Committee proposes the following criteria to ensure that the sand used in these filter does not contaminate the organic product.

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.

Proposal: (new language in red, bold)

Maple Guidelines, E. Production Equipment, Methods, and Syrup Storage

Sap Filtration and Reverse Osmosis Equipment:

Accepted:

- Use of reverse osmosis, ultra-filtration of sap, and ultraviolet light are allowed.
- Pool filters, if used for sap filtration, must use food-grade ~~sand~~ or diatomaceous earth or **sand that is NSF or ANSI certified (or other comparable standard for materials intended for contact with potable water)**. In addition, plastic that comes in contact with the sap must be food grade. The Agency of Ag maintains a list of allowed pool filters.

### 3) **Certifying New Beef Operations**

Background:

When existing beef operations apply for organic certification, the inspector is tasked with verifying which animals qualify for organic beef. They do this by verifying whether an animal has been raised organically from the last third of their gestation. Recently the question has come up as to 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 an animal qualifies as organic beef.

Relevant Standards:

§205.236 Origin of livestock.

(a) Livestock products that are to be sold, labeled, or represented as organic must be from livestock under continuous organic management from the last third of gestation or hatching: Except, That:

(3) Breeder stock. Livestock used as breeder stock may be brought from a nonorganic operation onto an organic operation at any time: Provided, That, if such livestock are gestating and the offspring are to be raised as organic livestock, the breeder stock must be brought onto the facility no later than the last third of gestation.

(b) The following are prohibited:

(2) Breeder or dairy stock that has not been under continuous organic management since the last third of gestation may not be sold, labeled, or represented as organic slaughter stock.

Proposal: (new language in red, bold)

III Livestock Production, A. Origin of Livestock, 5) Accepted and Prohibited Origins of Livestock, Page 55

5) Accepted and Prohibited Origins of Livestock

Accepted

- Farm-raised stock or purchased stock from certified organic producers for replacement animals.
- Day-old poultry purchased from any source.
- Conventional breeder stock must be brought onto the farm before the last third of their gestation to verify their organic management during this time. The breeder animal will not qualify for organic production but her offspring will. Once they freshen, they can only nurse their own offspring. A non-organic breeder animal cannot be a nurse animal for organic youngstock other than her own.

- For new beef operations, VOF will only certify beef animals born 3 months after the organic inspection. However, if records are available, VOF allows the producer to provide documentation of production practices from up to 6 months prior to the inspection date. Therefore, any animal 3 months of age or younger at the time of inspection could qualify for organic beef if records going back 6 months are available to verify that the breeder stock were managed organically during the last third of their gestation. Examples of relevant records include records that confirm crops fed were certified organic, records verifying animals were grazed on qualifying pasture, grain receipts, calving/breeding dates, animal identification, and health records. VOF will not verify production practices that occurred more than 6 months prior to the date of the inspection
- Male livestock for the purpose of breeding may be purchased, leased or borrowed from conventional sources. However, when male livestock are being housed on an organic farm, they should be managed organically. All health care treatments must be recorded in the producer's health records. If the animal must be treated with a prohibited product, producers should first attempt to treat the animal with organic methods. If these methods fail and the animal must be treated with a prohibited product, the animal may remain on the farm to provide services. When male livestock are treated with antibiotics the VOF Office must be informed. In addition, VOF recommends that whenever possible male livestock are provided outdoor access year round and provided access to pasture during the growing season as long as the animal can be managed safely.
- Frozen embryos from conventional breeding stock may be transferred into an organic recipient animal as long as no synthetic hormones or prohibited substances are used on the organic animal.
- Livestock purchased from certified organic auction houses.

#### 4) Container Growing

##### Background:

In 2014, to protest the allowance of soil-less production systems (like hydroponic and aeroponic production), VOF producers passed a resolution to support the NOSB recommendation to prohibit soil-less hydroponic vegetable production as certified organic. Prior to 2014, Vermont Organic Farmers had never certified hydroponic operations based on the idea that it is not compatible with organic farming principles. Today the conversation has become more convoluted, as certifiers no longer use the word hydroponic and instead certify "container" production. There are currently no guidelines that require a minimum amount of soil or a restriction on liquid fertilization in container production. The Review Committee proposes the following language to clarify our intent and to prevent producers misunderstanding what VOF will accept for organic applications.

##### Relevant Standards:

§205.203 Soil fertility and crop nutrient management practice standard.

(a) The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion.

(b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.

(c) The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances.

Proposal: (new language in red, bold)

II Certification Eligibility, A. Admissibility, 1) Application Restrictions, Page 15

Application Restrictions-VOF does not accept applications for hydroponic, soilless, **or container** production of edible crops to a harvestable stage. **Transplants, ornamentals and herbs can be grown in containers if sold in containers. Sprouts, fodder, mushrooms, and microgreens are exempted from this application restriction. The VOF Review Committee must approve any variances to this restriction.**

## Other items to be voted on by the membership

### 1) 2020 Proposed Budget & 3% Base Fee Increase (\$15)

VOF staff will be presenting the 2020 budget with a 3% base fee increase. This will be an increase of \$15 per operation.

### 2) VOF Review Committee & EC Committee Members

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

### 3) VOF By-law Changes

VOF staff will be presenting changes to the by-laws that address issues from our internal audit. These changes address the relationship between NOFA-VT and VOF. Specifically, in regards to VOF Executive Committee members and the Executive Committee's authority over the "Executive Director" of VOF.

## Standard & Application Updates

These items are updates for your information but will not be voted on at the annual meeting.

### 1) Genetic Integrity of Seeds

Did you know you can request information about genetic contamination when purchasing seeds? The NOSB passed a proposal at the fall 2019 meeting recommending steps towards better transparency around genetic contamination of seeds. As part of the proposal, the NOSB received information from seed suppliers that serve the organic market. According to the NOSB, the vast majority of seed suppliers reported that they already test much of their seed for detectable levels of genetic engineering, and, when asked, are willing to provide this testing information to those who buy their seed. Most farmers are not aware that this testing is being done, and consequently, most do not currently request this information. The NOSB proposal is simple. It recommends that certifiers inform producers they can request the results of any testing for presence of genetic engineering in the seeds they purchase. To meet organic market demand and to provide farmers with what they need to make informed decisions when choosing seeds, transparency of GE contamination levels and the knowledge of the adventitious presence of genetic engineering in their seed has become a necessity.

## 2) Logo for Approved Compost

In 2019, the Review Committee decided that VOF should pursue a logo for composters that have their compost approved for use on organic farms by VOF. This logo will help composters distinguish their products and help producers recognize that the compost is approved for use in organic production. The current VOF certification logo is allowed only for products that are certified organic;

therefore having a separate approved compost logo will be a benefit to composters who go through the compost approval process.



## 3) Hemp

The 2018 Farm Bill legalized the commercial production of hemp by distinguishing hemp from marijuana and by removing hemp from the Controlled Substances Act. This change lifted many restrictions on the cultivation, transport, processing, and marketing of hemp and hemp products. As a result of this legislation, the USDA established the U.S. Domestic Hemp Production Program on October 31, 2019. The rule outlines provisions for the USDA to approve plans submitted by States and Indian Tribes for the domestic production of hemp. It also establishes a Federal plan for producers in States or territories of Indian tribes that do not have their own USDA-approved plan. On November 26<sup>th</sup>, the NOP officially replaced NOP Memo 2040 with new language that allows hemp produced in accordance with the U.S. Domestic Hemp Production Program and/or the 2014 Farm Bill to be certified as organic, if produced in accordance with USDA organic regulations. VOF is currently accepting applications for organic hemp and hemp products (CBD, hemp meal, hemp flour, etc.).

## 4) Electronic Payments

VOF would like to announce that we now accept online credit card payments for certification fees! This option allows you to pay all certification fees online (a 3% convenience fee will be charged). We are still accepting payments by check or cash. To pay online, just log in to your account and click on your pending certification. Once the general producer application and the certification fee form have been completed, you will find a button that says "Pay Fees".

## Materials Updates

These items are updates for your information but will not be voted on at the annual meeting.

### 1) Milk House Sanitizers

In 2018, VOF notified producers that our policy on milkhouse cleaning products was changing. Historically, VOF allowed the use of all milkhouse cleaning products, regardless of whether a clean water rinse followed the product use. However, the NOP has clarified that all sanitizers must undergo a material review if not followed by a clean water rinse. This means that all active and inert ingredients must be reviewed for compliance with organic regulations. The 2019/2020 Organic Livestock Healthcare List has the names of brand name sanitizers that are approved for use without a rinse. Please note, cleaners and sanitizers not on the approved list will need to be immediately replaced.

## 2) National List Changes

The National Organic Program (NOP) published final rules in 2019 for the following substances. The final rule:

- Prohibits **Ivermectin** in livestock production. (Effective December 27, 2019)
- Restricts **Flavors** in processing and handling so that organic flavors are required when commercially available (Effective December 27, 2019)
- Reclassifies **Carnauba wax and Glycerin** in processing and handling as agricultural, thereby requiring the use of organic forms when commercially available. (Effective December 27, 2019)
- Allows **elemental sulfur** to be used as a slug or snail bait to reduce crop losses. (Effective November 22, 2019)
- Allows **polyoxin D zinc salt** for plant disease control. (Effective November 22, 2019)
- Reclassifies **magnesium chloride** from a synthetic to a non-synthetic substance. (Effective November 22, 2019)
- Allows **elemental sulfur** to be used in organic livestock production as a topical treatment to repel mites, fleas and ticks from livestock and their living spaces. (Effective May 30, 2019)
- Reclassifies **potassium acid tartrate** from a nonagricultural substance to an agricultural substance, requiring handlers to use the organic form when it is commercially available. Potassium acid tartrate is currently listed as a nonorganic ingredient allowed in organic products. (Effective May 30, 2019)

On October 18, 2019, the U.S. Department of Agriculture published a proposed rule in the Federal Register to amend the National List of Allowed and Prohibited Substances (National List) based on public input and the October 2018 recommendations from the National Organic Standards Board.

This proposed rule would:

- Allow **blood meal made with sodium citrate** to be used as a soil amendment.
- Prohibit the use of **natamycin** in organic crop production.
- Allow **tamarind seed gum** to be used as a nonorganic ingredient in organic handling when an organic form is not commercially available.



## **Executive Committee Member Biographies**

The Executive Committee (EC) consists of 3 non-certified constituents elected by the general constituency. The Executive Committee shall meet at least once a year. Major responsibilities include conducting an annual review of the quality system in place for certification, including review of the internal audit reports and complaint file and reviewing the annual budget to be approved at the annual meeting.

### **Annette Higby**

Most recently Annette Higby was the Grassroots Advocacy and Outreach Coordinator for the National Sustainable Agriculture Coalition. She also coordinated the 2008 farm bill campaign for the National Campaign for Sustainable Agriculture. Her Vermont law practice focuses on generational farm transfer, farm business formation and farmland leasing, and land tenure issues. Annette lives in Randolph, Vermont.

### **Brian Norder**

Brian Norder is a Food Consultant for Vermont Food Consulting Services. Former Project Director of the Vermont Food Venture Center, Norder has helped food entrepreneurs develop and market dozens of products since 1997. Through his affiliation with a group based at Boise State University, he has consulted with over 25 food business incubation programs throughout the country. Norder was also Product Development Specialist for the Northeast Center for Food Entrepreneurship (NECFE) at the University of Vermont (UVM) and Cornell under a four-year USDA grant and conducts trainings in food safety, business planning and product development. He currently serves as state administrator for the NxLevel Educational Network, a consultant to the Vermont Institute for Artisan Cheese at UVM and an adjunct instructor of food science at New England Culinary Institute.

### **Sam Smith**

Sam Smith joined the Intervale Center staff as a Farm Business Specialist in 2012. He brings a passion for farming and food systems to his work helping farmers develop viable farm businesses. He grew up in Southern Vermont, went to UVM, and received a MBA in Sustainability from Antioch New England. He has worked as both a livestock and vegetable farmer, and been involved in the Vermont agricultural community for over 15 years.

## **Review Committee Member Biographies**

The Review Committee (RC) consists of five constituents elected by the general constituency. The RC decides appropriate measures to be taken for operations with adverse actions and also creates interim policies for National Standards interpretations to be ratified at the annual producer meeting.

### **Annie Claghorn, Taconic End Farm**

Annie co-owns and operates a family dairy operation in Leicester, VT that has been certified organic since 1988. Annie and her husband milk about 30 registered jerseys on a seasonable basis with an emphasis on good rotational pasture management. Annie was an active member of Vermont Organic Milk Producers Association, which started in 1999 in response to milk market changes that were happening in the state. VOMPA was instrumental in the creation of the Northeast Organic Dairy Producers Association in 2001 and Annie soon became a NODPA State Representative and was elected to a Board position in 2006.

### **Andy Jones**

Andy has managed the Intervale Community Farm starting in 1993. Since then he has been active in developing the local food system through working with CSAs, other Intervale farms, and the Vermont farming community. Andy was the past president and board member of both the Northeast Organic Farming Association of Vermont (NOFA-VT) and the Vermont Vegetable and Berry Growers' Association. Andy graduated with a B.A. in Geology from Oberlin College. 2019 was his first year on the Review Committee.

### **Anne Lazor, Butterworks Farm**

Anne began a homestead dairy operation selling homemade dairy products to the local community in 1979. From a herd of 6 original animals, Butterworks now has close to 100 animals. In 1984, Butterworks Farm became licensed to produce yogurt. Anne graduated with a Bachelors Degree from the University of Wisconsin. She has been involved with organic dairy standards since 1989 and has served on the Review Committee since 2007.

### **Tim Sanford, Luna Bleu farm**

Tim is the owner/operator of a diverse organic vegetable and livestock family farm since 1992. He graduated from New York State College with a Bachelors Degree in Science and Forestry with a major in Wildlife Biology and a minor in Natural Resource Management. Tim has served on the Review Committee since 1994!

### **Dave Folino, Hillsboro Sugarworks**

Dave and his wife Susan own and operate Hillsboro Sugarworks in Hanksville, VT. They are one of the first certified organic sugar makers in the state and have been producing maple syrup for 40 years. Dave and Susan try to be careful in the woods, efficient in their business and direct market as much of their product as possible. Dave is a director for the Vermont Sugar Makers Association for Addison county. 2018 was his first year on the Review Committee.

VERMONT ORGANIC FARMERS LLC  
OPERATIONAL POLICIES BY LAWS

ARTICLE I - Purpose

Vermont Organic Farmers, LLC (VOF) is a Vermont, manager managed n independent Limited Liability Company Corporation, of which the Northeast Organic Farming Association of Vermont (NOFA-VT) is the sole member. The purpose of VOF, whose purpose is to educatedisseminate farmers, processors, and consumers about the national standards of organic food production in Vermont, and to provide third party verification of compliance to those standards. VOF acts as the primary organic certification organization of commercial organic producers and processors in the state of Vermont. The guiding document under which VOF operates is the National Organic Program's Final Rule (7 CFR Part 205, Docket Number: TMD-00-02-FR). VOF may also operate third party certification programs consistent with the purposes of the Company and the Member, if and when such programs are considered appropriate by the Member and Executive Committee as per the Operating Agreement.

ARTICLE II – Constituency and Certification Fees

**Constituency-** The constituency shall consist of processors and food and plant producers whose operations have been certified in the current year according to national standards. Each certified operation shall have one vote. Executive Committee members are part of the constituency and shall each have one vote. In addition, non-certified members of the Review Committee are part of the constituency and shall have one vote each.

**Fees-** Amounts and deadlines for payment of fees, and late penalties, shall be decided upon annually by the Executive Committee and ratified by the constituency at the annual meeting. Executive Committee Members shall be exempt from any fees.

ARTICLE III - Meetings

There shall be an annual meeting of the general constituency.

**Notice of Meetings** shall be sent to all constituents at least 14 days prior to the meeting date, and all items to be voted on shall be included in the agenda. Any extraordinary, non-budgeted disbursement of VOF moneys shall be warned in this way.

**Quorum** - There is no quorum required to transact business.

**Voting** – A 2/3 majority of those voting in the affirmative at a meeting shall be required for the adoption of any policies for National Standards interpretations, policy decision.

**Special Meetings** - Special meetings shall be called by the Executive Committee at the written request of at least 25% of the voting constituents. Special meetings shall be warned at least 14 days prior to occurrence and any duly warned business may be acted upon at such a meeting.

#### ARTICLE IV - Management

**Executive Committee** - The management of VOF shall be vested in a committee of Managers (the Executive Committee) as elected by a majority vote of certified processors and food and plant producers at the Company's annual meeting. The Executive Committee shall consist of no less than three (3) nor more than five (5) non-certified individuals. The Executive Committee shall also include the Certification Director and the NOFA-VT Executive Director. Each Manager shall have one (1) vote. The Executive Committee shall act by the affirmative vote of a majority of the total number of members on the committee. The Executive Committee shall meet at least once a year. An Executive Committee will be elected by the VOF constituency and shall consist of three to five non-certified constituents.

~~The Executive Committee shall meet at least once a year and as necessary, act as a liaison between VOF and the NOFA-VT Board, and as necessary, be a spokesperson for VOF's policies and positions.~~

~~Executive Committee responsibilities include, but are not limited to:~~

~~—Selecting the Executive Director and conferring, as needed, with the Executive Director on the selection of the Certification Director, Bookkeeper, Field Inspector, or other necessary staff, and for defining and overseeing the proper completion of their duties (as outlined below.)~~

~~—Approving compensation for employees and Review Committee.~~

~~—Dismissing Executive Director if warranted.~~

~~—Approving and reviewing VOF guidelines annually and insuring that they are implemented.~~

~~—Conducting an annual review of the quality system in place for certification, including review of the internal audit reports and complaint file.~~

~~—Establishing committees as needed.~~

The Executive Committee shall exercise all powers and responsibilities as required by and in compliance with the VOF, LLC Operating Agreement.

The Executive Committee shall conduct an annual review of the quality system in place for certification, including review of the internal and NOP audit reports and complaint file, taking

action where necessary to ensure NOP compliance and the continued delivery of high quality services to constituents.

The Executive Committee shall review and act upon annual financial statements, the VOF budgets and fee structures as presented by the Certification Director.

The Executive Committee may establish permanent or ad hoc committees as needed.

The Executive Committee may call a special meeting of the constituency of its own accord or if petitioned, in writing ~~Calling special meetings, if petitioned in writing,~~ by 25% of the constituents.

~~Reviewing the annual budget to be approved at the annual meeting.~~

~~Reviewing the bookkeeper's annual report.~~

~~Appointing people on an interim basis to fill vacant positions of elected committee members.~~

Members of the Executive Committee as necessary, may act as a spokesperson for VOF's policies and positions.

**NOFA-VT** NOFA-VT shall establish policies and guidelines for the hiring of a Certification Director and other employees or contractors to operate the Company who shall be responsible for conducting in the name of and on behalf of the Company the day to day business and affairs of the Company. The Executive Committee (excluding the Certification Director) shall hire the Certification Director. The Executive Committee (excluding the Certification Director) shall have the right to terminate the Certification Director of the Company and shall participate in the annual performance review of the Certification Director as conducted by NOFA-VT.

~~**Executive Director** The Executive Director's responsibilities include but are not limited to overseeing personnel involved in certification including filling vacancies when they occur, developing an annual budget to present to the Executive Committee, and maintaining a relationship with the Vermont Department of Agriculture. The Executive Director shall report to the Executive Committee on a regular basis.~~

**Certification Director** - The Certification Director is responsible for the execution of all certification programs, consistent with the organizational strategic plan and compliant with USDA organic standards (and/or the standards of other applicable accreditation bodies). The Certification Director's responsibilities include - but are not limited to - keeping official records of

all meetings, decisions, and applicants. ~~The Certification Director shall make certification decisions for all applicants with minor non-compliances.~~ The Certification Director shall also be responsible for providing information about VOF and its certified products and producers to the public. The Certification Director shall report to the Executive and Review Committees on a regular basis and develop an annual budget to present to the Executive Committee.

**Field Inspector** - The Field Inspector is an independent contractor hired annually to review applications, inspect operations, and interview producers and processors being reviewed for certification. Staff may also conduct field inspections. The Inspector must not have had affiliation or business relationships with any applicant being evaluated for the 12 months prior to the inspector's contract. If necessary, the Field Inspector will report to the Review Committee after all visits.

**Review Committee** - A Review Committee shall consist of 5 members elected by the general constituency. Of these members, no more than 1 shall be a non-certified constituent. The Review Committee shall create interim VOF policies for National Standards interpretations. These interpretations will be considered, voted upon and either rejected or passed by a 2/3rds majority vote at the VOF annual meeting.

The Review Committee will review noncompliances except those related to late applications and late fees per the Certification Director's discretion and will make certification decisions for all proposed adverse actions except those related to late applications and late fees. Any adverse action taken by the Review Committee must be reviewed for impartiality by the Executive Committee. The Review Committee will make certification decisions on any operation that is inspected by the Certification Director. ~~The Review Committee shall create interim policies for National Standards interpretations. These interpretations will be voted on and either passed or rejected at the VOF annual meeting.~~

Review Committee members must not have had affiliation or business relationships with any applicant being evaluated for the 12 months prior to the date the application was submitted for review. If an individual member has had such an affiliation, that member must exclude themselves from any discussion or decision regarding the applicant. ~~The Review Committee has the authority to issue certificates on behalf of VOF. It also reserves the right of revocation in cases of non-compliance with the certification standards.~~

~~————— In unique, extraordinary or emergency situations, the Review Committee shall have the power to make discretionary decisions pertaining to a VOF application. Any such decisions shall be reported to the constituency and the National Organic Program Administrator.~~

~~Financial Director Bookkeeper~~ - The ~~Financial Director bookkeeper~~ shall receive and disburse all moneys on behalf of the corporation, and shall be responsible for financial records. The ~~Financial Director bookkeeper~~ shall prepare an annual financial report and also shall provide the Executive Committee with information for the budget-making process.

**Facilitator** - The Facilitator is responsible for running an orderly meeting according to the set agenda.

#### ARTICLE V – Guidelines to the National Standards

The ~~VOF~~ Guidelines shall be ~~updated~~reviewed annually. The Executive Committee will insure a process for the annual review of the guidelines. Any VOF constituent can present amendments to be considered. Any proposed amendments shall be properly warned, and voted on by the general constituency at the annual meeting.

#### ARTICLE VI – Amendments to the ~~Operational Policies~~By Laws

The ~~by laws~~operational policies may be amended by a 2/3 affirmative vote of the constituents present at any regular or special meeting, provided constituents have been warned at least 14 days prior to the meeting. Proposed amendments must have approval of at least 20% of the voting constituency before being warned.

#### ARTICLE VII – NOFA-VT Affiliation

The NOFA-VT board shall receive minutes or summaries of the VOF annual meeting and the VOF budget and audit reports at the next NOFA-VT board meeting, or within 3 weeks after the VOF meeting, whichever comes later.

Amended: February 2002

Amended: March 2007

Amended: January 2008

Amended: January 2019

Amended: January 2020



# Northeast Organic Farming Association of Vermont

*Growing local farms, healthy food, and strong  
communities in Vermont since 1971.*



April 4, 2019

National Organic Standards Board  
Michelle Arsenault, Advisory Committee Specialist  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2642-S, Mail Stop 0268  
Washington, DC 20250-0268

Public Comment

NOSB Meeting – Spring 2019

Docket: AMS-NOP-18-0071

Nicole Dehne, Certification Director, Vermont Organic Farmers LLC

Madison Monty, Policy Advisor, Northeast Organic Farming Association of Vermont

Vermont Organic Farmers LLC (VOF) is a USDA accredited certifier representing 709 certified organic farmers and processors. The organization has been certifying producers since 1985 and has been accredited by the USDA since 2002. The Northeast Organic Farming Association of Vermont (NOFA-VT) is one of the oldest organic farming organizations in the country with over 1,200 members – farmers, gardeners and consumers working to promote an economically viable and ecologically sound food system. We appreciate the opportunity to comment on the NOSB's agenda items.

## **Crops Subcommittee**

Proposal: Strengthening the organic seed guidance April 2019

We support the work of the crop subcommittee and feel the suggested changes to the NOP's Seed Guidance document will result in the desired goal of more use of organic seeds and planting stock without over burdening the organic producer or certifier.

Discussion document: Paper (Plant pots and other crop production aids)

We appreciate the NOSB adding this item to their work agenda in a timely manner. VOF continues to stress the importance of this product to small-scale vegetable producers in Vermont. We request that when the NOSB reviews this material for use on organic farms that virgin paper be included as part of that review. This may mean requesting that the Technical Report includes virgin paper as well as recycled paper. If additives, such as synthetic fibers, are a concern, then allowing virgin paper may offer better control over what additives the paper contains. In addition, we ask that the NOSB take a practical approach to reviewing this material understanding that recycled paper is already widely used in organic systems as mulch, pots, etc.



### 2021 Sunset Reviews:

VOF crop producers use the following materials from the list of 2019 sunset reviews. VOF supports the relisting of these materials as they are important tools for VOF producers.

- Hydrogen peroxide is used to clean equipment and irrigation lines.
- Soaps, ammonium are used as animal repellents.
- Oils, horticultural are used as insecticides.
- Pheromone traps are used by our producers to control pest populations.
- Ferric phosphate is used by our producers for slug and snail management.
- Potassium bicarbonate is used as an effective tool on tomato powdery mildew in high tunnels and greenhouses.
- Magnesium sulfate is widely used by organic tomato greenhouse growers to address magnesium deficiency.

### **Livestock Subcommittee**

#### Discussion document: Use of excluded method vaccines in organic livestock production

We agree with the subcommittee's emphasis on the importance of vaccines to organic livestock producers. In addition, vaccines compliment an important organic principle of disease prevention. We believe that the current regulations prohibit the use of vaccines produced with excluded methods unless they are on the National List. Currently, VOF reviews all the vaccines used by our producers to determine if those vaccines have been produced with excluded methods. We have not found that the livestock producers we certify- beef, pork, small poultry operations, and dairy- have needed a vaccine produced with excluded methods. However, we do not certify large poultry or pork operations and we understand that there may be vaccines needed by livestock producers in other parts of the country that are not needed in Vermont. Therefore, we support the change proposed by the subcommittee that would allow producers to use vaccines made from excluded methods when alternatives are not commercially available. For clarity, we suggest using a definition of commercial availability that is similar to seeds and planting stock- quality, quantity and specificity to a disease or health issue. Documentation of commercial availability could include statements from a veterinarian and statements from suppliers of vaccines.

### 2021 Sunset Reviews:

VOF livestock producers use the following materials from the list of 2021 sunset reviews. VOF supports the relisting of these materials, as they are important tools for VOF producers.

- Fenbendazole: With ivermectin going off the National List in December, having fenbendazole available in the toolbox for emergency use will be significant to livestock producers in Vermont.

- Moxidectin: With ivermectin going off the National List in December, having moxidectin available in the toolbox for emergency use will be significant to livestock producers in Vermont.
- Atropine: According to veterinarians in Vermont who work with organic livestock producers, atropine is used for the treatment of organophosphate toxicity and as an antidote for the rare occasion that intravenous calcium gluconate infusion causes cardiac dysrhythmia/arrest. It is also used as a bronchodilator in low doses for animals in respiratory distress. The risk in cows is its negative effect on the vagal nerve which innervates the forestomachs and can cause bloating, so proper dosing is warranted. Organophosphates are less widely used than in years past, and improved management and oral calcium products have reduced the need for intravenous calcium. While rarely needed, atropine is an emergency and potentially lifesaving drug that should be available to organic livestock producers when necessary.
- Hydrogen peroxide is widely used by producers in Vermont to clean equipment and for cleaning wounds.
- Iodine is widely used by organic livestock producers in Vermont as a teat dip.
- Magnesium sulfate: According to veterinarians in Vermont who work with organic livestock producers, magnesium sulfate is used for the treatment of grass tetany (hypomagnesemia) by intravenous infusion, and orally for acidosis, as an osmotic laxative for constipation/impaction/indigestion, and in DCAD diets fed to transitioning cows to prevent hypocalcemia and its associated metabolic disorders. Topically, magnesium sulfate is used for its osmotic "drawing" and antibacterial impact on deep, infected lesions like sole ulcers and foot rot. Grass tetany is rare, but without prompt intravenous intervention, affected cows progress to convulsions and death rapidly.
- Peracetic acid is used as a sanitizer in cleaning of milk lines.
- Xylazine is used as a sedative. This is an important tool and needed to moderate pain and stress during operations and medical treatments.
- Methionine is currently used in organic livestock feed by poultry producers in Vermont.
- Trace minerals are an important tool for managing livestock health.
- Vitamins are an important tool for managing livestock health.

## **Handling Subcommittee**

### 2021 Sunset Reviews

VOF producers certified to the processing scope use the following materials from the list of 2019 sunset reviews. VOF supports the relisting of these materials, as they are important tools for VOF producers.

- Citric acid is widely used by producers in Vermont.
- Dairy cultures are widely used in organic dairy products (cheese, yogurt, kefir, etc.).
- Enzymes are widely used in organic dairy products (cheese, yogurt, kefir, etc.).

- Lactic acid is used as a carcass wash in slaughter houses in Vermont.
- Microorganisms are used in organic fermentation products (tempeh, natto, etc.).
- Yeast is used in organic bread by producers in Vermont.
- Hydrogen peroxide is used to clean equipment and food contact surfaces.
- Nutrient vitamins and minerals are used by dairy producers in milk, yogurt and dairy products.
- Peracetic acid is used to clean equipment and food contact surfaces.
- Tocopherols are often used in organic beauty care products.

### **Materials Subcommittee**

#### Discussion document: Excluded Methods: Induced mutagenesis and embryo transfer in livestock

Over the last 15 years, VOF has gotten one or two questions about the use of embryo transfer on organic farms. It has been our understanding that as long as no hormones were used to synchronize animals who receive the transferred embryo, that the process could be approved. Having said that, we have not had a producer interested in the process who felt willing to take the risk of embryo transfer without using hormones to synchronize estrus. Therefore, we are sharing our experience that this technology has not been in high demand nor a necessity for livestock producers in Vermont.

#### Discussion document: Genetic integrity transparency of seed grown on organic land

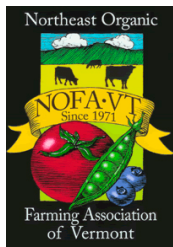
We support the subcommittee's work towards genetic integrity transparency of seed grown on organic land. We appreciate that the subcommittee has expressed that tolerance levels for seed contamination will not be created at this time. This proposal will be most successful if used as a tool for collecting information and determining levels of contamination vs. as a means to determine compliance. We do not feel that this proposal if implemented would be a burden to organic producers in Vermont. However, we do not have a significant group of producers that grow organic corn. In addition, the suppliers of organic corn seed in the state have multiple varieties of organic feed corn available to producers.

We suggest that NOP collect the information about seed purity as part of the certifier's annual update. The organic integrity database could be modified to collect more information from certifiers than just information about individual producers. A pilot project collecting information on seed purity might be a first step towards a more robust system of data collection.

#### Discussion document: Assessing cleaning and sanitation materials used in organic crop, livestock and handling

We appreciate the NOSB identifying this topic as an issue and starting the process to develop specific criteria and questions for assessing cleaning and sanitation materials used in organic production. Cleaning and sanitation materials are an important tool for organic processors, crop and livestock producers. We also support the subcommittee's request for a technical review of

cleaners and sanitizers. At the same time, it is essential that certifiers and producers have guidance about how to review and use these materials. We support the ACA's practical comments and feel their suggestions will help to improve the discussion document.



# Northeast Organic Farming Association of Vermont

*Growing local farms, healthy food, and strong  
communities in Vermont since 1971.*



October 3, 2019

National Organic Standards Board  
Michelle Arsenault, Advisory Committee Specialist  
USDA-AMS-NOP  
1400 Independence Avenue, SW  
Room 2642-S, Mail Stop 0268  
Washington, DC 20250-0268

Public Comment  
NOSB Meeting – Fall 2019  
Docket: AMS-NOP-19-0038  
Nicole Dehne, Certification Director, Vermont Organic Farmers LLC  
Madison Kempner, Policy Advisor, Northeast Organic Farming Association of Vermont

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## **Crops Subcommittee**

Discussion document: Paper (Plant pots and other crop production aids)

We would like to extend our gratitude to the NOP for extending the allowance of Paper Pots for use on organic farms and to thank the crops subcommittee for submitting a discussion document in a timely manner. Based on the numerous written and oral comments, it is clear that the Paper Pot transplanting system saves time and labor for small organic vegetable producers and not being able to use this system would have an immediate negative affect on these organic farmers.

We are also thankful for the July 2019 Technical Report on Paper Pots and Containers. In our reading, this document confirmed some important points about the synthetic additives and fibers included in the production of the Paper Pots. Those points are as follows:

- 1) Various additives used in paper and paperboard are already approved as indirect food additives, including adhesives and coatings. This means that these substances may already come into contact with organic food via packaging.

- 2) PVA, PVAc, EVA and magnesium chloride (synthetic fibers used in Paper Pots) are also allowed on EPA list 4B as inerts in pesticides approved for use on organic farms.
- 3) Recycled paper products generally have greater contaminant content than virgin paper. Inks, dyes, and other chemicals not applied to virgin paper will still be present in recycled paper, with only the highest grades of recycled papers being free of impurities and contaminants.
- 4) Even when natural fibers are used, many of these will use various synthetic additives as binders, linking agents, stabilizers, strengtheners, and other agents.
- 5) Most if not all paper pots that are now commercially available use artificial fibers; two specific ones mentioned in the petition are PVA and PLA. Both polymers have been considered by the NOSB in previous petitions. PVA was included in the 2017 Technical Review on newspaper and other recycled paper (USDA 2017). PLA was evaluated as part of the biodegradable plastic mulch petition (Mojo 2012). In other words, all the synthetic fibers confirmed to be components of the Paper Pots have been evaluated in previous Technical Reviews for newspaper, cardboard and other recycled papers permitted on the National List.

Based on this important information from the Technical Report, we strongly urge the NOSB to expand the allowance of paper products to the National List by adding the following language to section 205.601 (o) "Virgin or recycled paper, without colored or glossy inks". We do not recommend that any restrictions be applied for synthetic polymer content, biodegradability or biobased content. It is important that we solve this issue in a simple way, which is to expand the already accepted allowance of recycled paper as mulch and compost feedstock to include virgin paper and to expand its use to paper pots and all paper production aids.

#### 2021 Sunset Reviews:

VOF crop producers use the following materials from the list of 2019 sunset reviews. VOF supports the relisting of these materials as they are important tools for VOF producers.

- Hydrogen peroxide is used to clean equipment and irrigation lines.
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Proposal: Use of excluded method vaccines in organic livestock production

We agree with the subcommittee's emphasis on the importance of vaccines to organic livestock producers. In addition, vaccines compliment an important organic principle of disease prevention. We believe that the current regulations prohibit the use of vaccines produced with excluded methods unless they are on the National List. Currently, VOF reviews all the vaccines used by our producers to determine if those vaccines have been produced with excluded methods. We have not found that the livestock producers we certify- beef, pork, small poultry operations, and dairy- have needed a vaccine produced with excluded methods. However, we do not certify large poultry or pork operations and we understand that there may be vaccines needed by livestock producers in other parts of the country that are not needed in Vermont.

Therefore, we support the change proposed by the subcommittee that would allow producers to use vaccines made from excluded methods when alternatives are not commercially available. The subcommittee's document does a great job in listing resources available for certifiers to begin to determine whether vaccines are genetically modified.

Certifier consistency is vital to the success of our industry. In the name of this consistency, we agree with the subcommittee that certifiers should work together and with the NOP to develop affidavits and lists of GE vaccines that do not have commercially available equivalents. In addition, the subcommittee's examples of how certifiers and producers might apply commercial availability to vaccines will be a helpful resource for certifiers. Documenting this search for vaccines will also need to be verified. We suggest that documentation of commercial availability could include statements from a veterinarian and statements from suppliers of vaccines.

In conclusion, we urge the NOSB to pass this proposal so that the industry can move forward and improve consistency amongst certifiers and organic producers regarding which vaccines are allowed for use.

#### 2021 Sunset Reviews:

VOF livestock producers use the following materials from the list of 2021 sunset reviews. VOF supports the relisting of these materials, as they are important tools for VOF producers.

- Atropine: According to veterinarians in Vermont who work with organic livestock producers, atropine is used for the treatment of organophosphate toxicity and as an antidote for the rare occasion that intravenous calcium gluconate infusion causes cardiac dysrhythmia/arrest. It is also used as a bronchodilator in low doses for animals in respiratory distress. The risk in cows is its negative effect on the vagal nerve which innervates the forestomachs and can cause bloating, so proper dosing is warranted. Organophosphates are less widely used than in years past, and improved management and oral calcium products have reduced the need for intravenous calcium. While rarely

needed, atropine is an emergency and potentially lifesaving drug that should be available to organic livestock producers when necessary.

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- Fenbendazole: With ivermectin going off the National List in December, having fenbendazole available in the toolbox for emergency use will be significant to livestock producers in Vermont.
- Moxidectin: With ivermectin going off the National List in December, having moxidectin available in the toolbox for emergency use will be significant to livestock producers in Vermont.
- Peracetic acid is used as a sanitizer in cleaning of milk lines.
- Xylazine is used as a sedative. This is an important tool and needed to moderate pain and stress during operations and medical treatments.
- Methionine is currently used in organic livestock feed by poultry producers in Vermont.
- Trace minerals are an important tool for managing livestock health.
- Vitamins are an important tool for managing livestock health.

Discussion document: Petitioned Material Discussion Document Fenbendazole

VOF certifies small poultry producers. It has been our experience that these poultry producers do not require synthetic parasiticides to manage their flocks. Typically, our producers control parasites by good pasture management. It is our concern that because the outdoor access requirements for poultry are not consistent, that allowing fenbendazole for all poultry producers would result in abuse of the allowance. How can producers without pasture, have a pasture management plan? Will organic poultry producers have enough land to keep birds off the infected pasture for enough time to prevent re-infestation? If adequate land is not available, poultry will continue to get re-infected and the need for fenbendazole will become routine.

When conventional dairy producers use fenbendazole, no withdrawal period for milk is required. However, the organic regulations require a withdrawal period of 2 days following treatment of cattle. Therefore, despite the fact that there is no withdrawal period for conventional egg



producers using fenbendazole, VOF still recommends a similar approach if this product's use is expanded to include organic egg production.

In addition, Vermont farms are experiencing parasite resistance to synthetic dewormers, including fenbendazole. This resistance is caused by routine use of these materials and this issue should also be taken into account as we think about expanding the use of synthetic parasitics to poultry.

### **Handling Subcommittee**

#### 2021 Sunset Reviews

VOF producers certified to the processing scope use the following materials from the list of 2019 sunset reviews. VOF supports the relisting of these materials, as they are important tools for VOF producers.

- Citric acid is widely used by producers in Vermont.
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- Lactic acid is used as a carcass wash in slaughter houses in Vermont.
- Microorganisms are used in organic fermentation products (tempeh, natto, etc.).
- Yeast is used in organic bread by producers in Vermont.
- Hydrogen peroxide is used to clean equipment and food contact surfaces.
- Nutrient vitamins and minerals are used by dairy producers in milk, yogurt and dairy products.
- Peracetic acid is used to clean equipment and food contact surfaces.
- Tocopherols are often used in organic beauty care products.

### **Materials Subcommittee**

#### Excluded Methods

Consumers continue to choose organic products for a number of reasons, and one of these reasons is that genetic engineering and its resulting products are excluded from organic production systems. Gene editing is a form of genetic engineering that the NOSB has determined is clearly excluded in organic by definition. Any future effort to allow products of genetic engineering into organic will likely be met with the full force of public resistance that the USDA witnessed in 1997, when the organic rules were first written and the initial draft proposal allowed genetic engineering and other now excluded methods. The newer genetic engineering techniques are still not needed in organic, and are not wanted by most organic stakeholders, including consumers, retailers, processors, and farmers. The NOSB has already reviewed (with numerous opportunities for public comment) gene editing techniques and recommended that they remain excluded methods.

We encourage the NOSB to continue to vocally oppose the inclusion of all forms of gene editing in organic. We support the NOSB recommendation on excluded methods from the fall of 2016. We would like to see this recommendation formally adopted by the NOP and implemented through guidance. In addition, we would like to see the NOP clearly articulate on the record that gene editing is not allowed in organic based on the current organic regulations.

Proposal: Excluded Methods: Induced mutagenesis and embryo transfer in livestock

We support the materials subcommittee's proposal to add induced mutagenesis developed through in vitro nucleic acid techniques to the table of excluded methods. Given that the NOSB has determined that in vitro nucleic acid techniques are considered to be an invasion into the plant genome (based on the criteria listed in the 2016, 2017, 2018 and 2019 recommendations on excluded methods determinations), we agree that this technique clearly belongs in the excluded methods category.

Over the last 15 years, VOF has gotten one or two questions about the use of embryo transfer on organic farms. It has been our understanding that as long as no hormones were used to synchronize animals who receive the transferred embryo, that the process could be approved. Having said that, we have not had a producer interested in the process who felt willing to take the risk of embryo transfer without using hormones to synchronize estrus. While this technology has not been in high demand nor a necessity for livestock producers in Vermont, we support the materials subcommittee's proposal to add this method to the chart of "not excluded" methods.

Discussion document: Genetic integrity transparency of seed grown on organic land

We support the subcommittee's work towards genetic integrity transparency of seed grown on organic land. Unfortunately, this issue seems to be pitting seed companies against farmers despite the fact that both groups have similar goals.

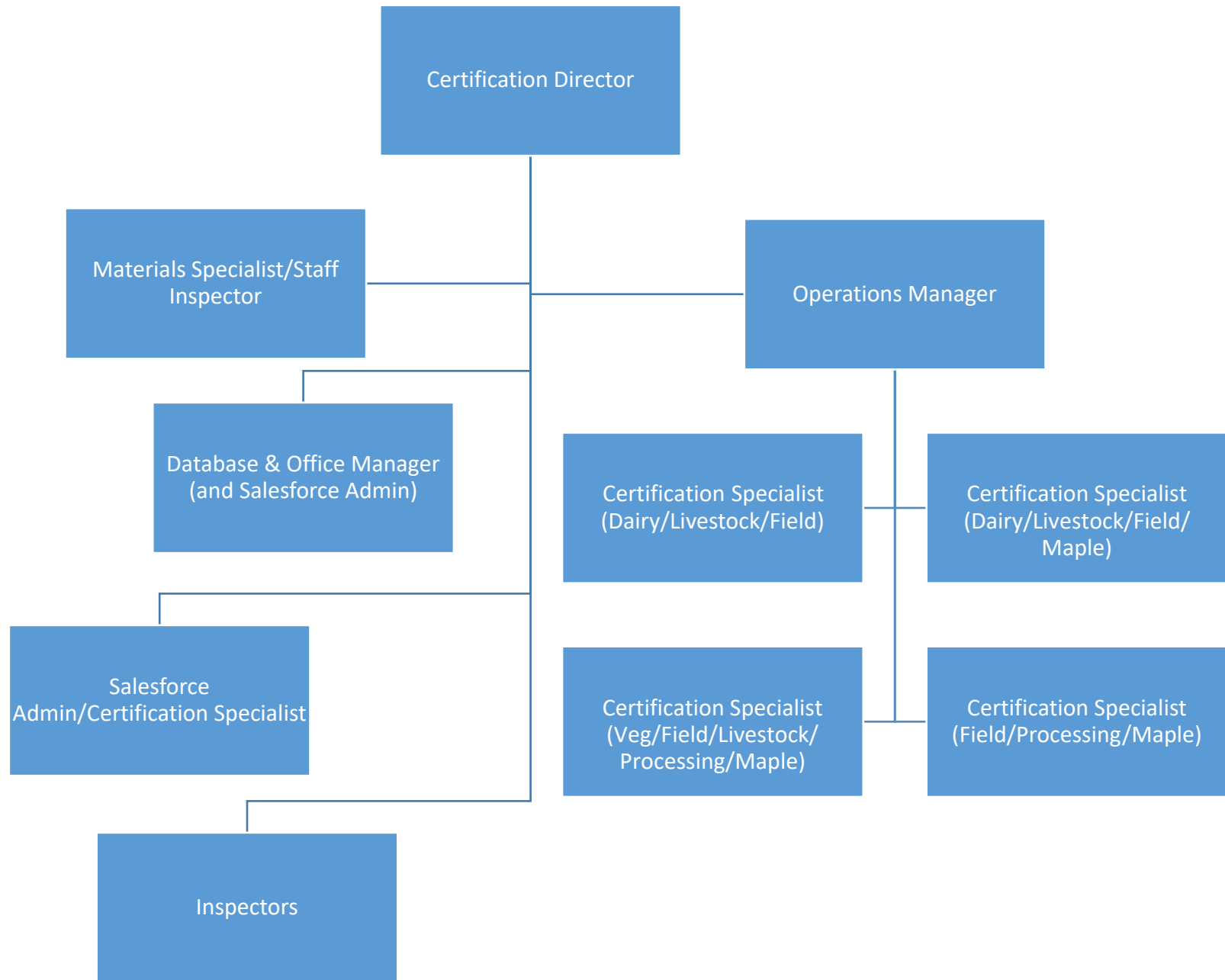
We understand the concern from seed companies that the burden involved in both determining and labelling the genetic contamination of seed could result in seed companies deciding to reduce the amount of organic seed they supply.

We also understand that farmers whose livelihoods and compensation depend on producing organic grain with low genetic contamination, are being unfairly treated if they cannot determine *before purchase*, the genetic integrity of their seeds.

We suggest a compromise position, which would be to require seed producers to provide in writing (but not necessarily on the label) a range of contamination for seed prior to purchase.

In addition, we know that convening a task force on this issue has broad support. As described in the subcommittee's proposal, the task force would be charged with collecting data for multiple years and in different regions. We support creation of this task force in order to help the organic community better understand the problem and thus develop solutions.

We recommend the subcommittee take this proposal back to committee and find a requirement for transparency that seed producers can implement without excessive burden.





# 2019 Statistics on Certified Organic Agriculture in Vermont\*

150,654 acres certified organic farmland!

Gross sales by VT certified organic farmers (farm income): \$131,111,230

Gross sales by VT certified organic processors: \$223,345,744

Total gross sales: \$354,456,974

Total number of producers: 775

Vermont Certified Organic Producers 2019 Totals	
Total Producers	775
Processors (non-farm)	93
Processors (on-farm)	43
Vegetable/Fruit	158
Field Crop	115
Dairy	187
Non-Dairy Livestock	65
Maple	204
Mushroom	13

\*Farms producing a variety of products may be listed more than once.

Organic Dairy Certification		Total Number of Certified Organic Producers		Total Number of Acres in Certified Organic Production	
1993	3	1993	78	1999	15,967
1994	3	1994	90	2000	22,148
1995	14	1995	106	2001	23,638
1996	28	1996	150	2002	24,351
1997	35	1997	170	2003	30,387
1998	33	1998	179	2004	35,826
1999	38	1999	187	2005	48,759
2000	47	2000	212	2006	66,827
2001	55	2001	230	2007	85,147
2002	59	2002	253	2008	92,192
2003	64	2003	289	2009	98,461
2004	79	2004	332	2010	102,637
2005	93	2005	366	2011	102,534
2006	129	2006	394	2012	103,827
2007	204	2007	487	2013	103,893
2008	200	2008	535	2014	104,565
2009	200	2009	548	2015	122,825
2010	203	2010	580	2016	137,932
2011	204	2011	582	2017	159,496
2012	205	2012	576	2018	154,421
2013	198	2013	585	2019	150,654
2014	184	2014	579		
2015	183	2015	589		
2016	203	2016	683		
2017	196	2017	719		
2018	192	2018	709		
2019	187	2019	775		

Certified Organic Acreage in Vermont			
Pasture	21,350 acres	Green House (sq.ft)	1,469,191
Grains/Livestock Feed	862 acres	Vegetable/Herbs	1,249 acres
Silage	1,273 acres	Fruit	556 acres
Hemp	1,229 acres	Oil Seed Crops	116 acres
Grain for Human Consumption	732 acres	Sugar Bush	60,424 acres
Hay Land	62,179 acres	Cover Crops	554 acres

\* These statistics are based only on production certified through Vermont Organic Farmers, LLC. There are other producers in Vermont certified by other certification organizations. The data compiled are actual figures for the number of farms certified by December 31, 2019.