



CERTIFIED

# Organic

## THE FUTURE OF ORGANIC FARMING IS IN OUR HANDS

*Five Years of Supporting Future Organic Farmers*



**Anticipation Builds for the Organic Grower Summit**  
**Whole-Farm Revenue Protection**  
**California Cannabis Certification Program**

A young girl and boy are standing in a field, likely a farm. The girl is wearing a purple dress and pink boots, and the boy is wearing a red shirt, blue jeans, and a blue baseball cap with the word 'TRUE' on it. They are both smiling. In the background, there is a large American flag waving. The scene is set in a field with rows of crops.

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# CERTIFIED Organic



26

## The Future of Organic Farming is in Our Hands

*"Our vision is to inspire and train a next generation of organic producers. It is amazing to realize that after just five years, the program has touched more than 33,000 teachers and students!"*

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# ORGANIC TRADE ASSOCIATION 2018 ANNUAL FUND

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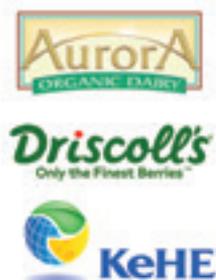


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The Organic Trade Association brings all segments of the organic industry together to protect the integrity of organic standards and promote the benefits of organic agriculture and products. The Organic Trade Association's initiative-based fundraising allows it to carry out the critical government affairs, consumer marketing and media outreach projects necessary to the health and well-being of the organic industry.

The Organic Trade Association's mission is to promote and protect ORGANIC with a unifying voice that serves and engages its diverse members from farm to marketplace. The Organic Trade Association's vision is to grow ORGANIC to achieve excellence in agriculture and commerce, protect the environment and enhance community well-being.

List of investors as of August 2018. To see a complete list of Annual Fund investors, please visit [www.ota.com](http://www.ota.com).

SINCE 1985  
*Organic*  
trade association

## *The Future of Farming*

What is the future of farming, and who will be the next generation of leaders who shape our food system?

CCOF is shaping answers to these questions through its Future Organic Farmer Grant Fund and other forward-looking programs designed to advance organic agriculture for a healthy world.

A 2017 survey of current, former, and aspiring U.S. farmers under 40 years of age conducted by the National Young Farmers Coalition (NYFC) indicates that the next generation of farmers has a strong interest in environmentally responsible farming. The report findings describe “a generation of producers strongly committed to environmental stewardship, with 75 percent of current young farmers describing their practices as ‘sustainable,’ and 63 percent describing their farming as organic.”

The survey also finds that, “like their millennial counterparts, young farmers surveyed by NYFC were highly educated and increasingly racially diverse.”

This matches the profiles of grantees described in Melody Meyer’s feature story celebrating five years of the CCOF Foundation’s Future Organic Farmer Grant Fund. The diversity and passion of these future food producers for organic agriculture are both inspiring and reassuring.

The Future Organic Farmer Grant Fund is truly making an impact by supporting the next generation of organic farmers; a recent independent review of the grant fund reported that over 80 percent of students who received a Future Organic Farmer Grant are more likely to pursue a career in the organic sector. The Future Organic Farmer Grant Fund is a clear example of how a small group of leaders—in this case, organic business leaders—can tackle a tremendous challenge and make a real difference.

Meyer describes early meetings of business funders who put their minds to impacting an aging population of farmers in the United States, and the need to inspire a next generation who would want to farm, and farm organically. Five years later, 33,000 students have been impacted through these grants. In 10 more years, that number will likely reach more than 100,000. Talk about shaping the future of American agriculture!

Combining this successful fostering of the next generation of farmers together with the goals of our next endeavor will chart a course toward a growing organic future. Our Roadmap to an Organic California project aims to increase the amount of land farmed organically in California from 3.5 percent to at least 10 percent by 2030.

Where will you join us on this path to an organic future?



*Cathy*

**Cathy Calfo**  
CCOF Executive Director/CEO

## **Issue Contributors**

### *Five Years of Supporting Future Organic Farmers, Page 26*



**Melody Meyer** discovered her passion for the organic food industry in 1976 when she began working at a natural foods co-op in Iowa. Years in the industry since then have given her extensive knowledge in international trade, organic marketing, policy, and regulations. Meyer was most recently vice president of corporate social responsibility, policy, and industry relations at UNFI and served as the founding executive director of the UNFI Foundation. Meyer served on the board of directors for the Organic Trade Association for nine years, and is currently a board trustee for The Organic Center. After ending her 18-year tenure at UNFI, she is consulting at [www.sourceorganic.com](http://www.sourceorganic.com) and providing thought leadership on her blog at [www.organicmattersblog.com](http://www.organicmattersblog.com).

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## Connect, Learn and Grow with the Organic Farming Community

The Organic Grower Summit brings organic growers, producers and processors to Monterey for two days of education, information and networking opportunities with their production supply chain and support service providers.

### New Additions to OGS 2018



A new two-day format, with intensive educational sessions, keynote speakers and an exhibition trade show floor on both days of the show.



An increase in show size to over 90 exhibitor booths and 1,000 attendees.



New location at the renovated Monterey Conference Center in downtown Monterey.

### Sponsored By:





Left: Industry experts provide insight on the state of organic. Right: Growers and Costco buyers network at "Meet the Grower."

## *Anticipation Builds for the Organic Grower Summit*

CCOF members, organic growers, and service providers are looking forward to the Organic Grower Summit (OGS) on December 12-13 in Monterey, California. A joint production between CCOF and the Organic Produce Network (OPN), OGS will bring together the entire organic growing and production chain as well as service providers and supply chain partners for two days of information, education, and networking opportunities.

The second annual OGS will offer organic growers, producers, and handlers from the fresh produce, dairy, meat, and grain sectors the opportunity to meet and engage with suppliers, service providers, packaging and technology companies, equipment manufacturers, and other companies critical to their success.

"Growers are key to meeting the demand for organic products, and grower-driven events like OGS are important to their success," says CCOF Executive Director/CEO Cathy Calfo. "Following the success of last year's inaugural OGS, CCOF growers look forward to this rare opportunity to network with each other and with other organic sector leaders and innovators."

OGS 2018 features an increase in show size to over 90 exhibitor booths and 1,000 attendees across a two-day format. This year John Foraker, co-founder & CEO of Once Upon A Farm, a company with the mission of providing yummy and nutritious "farm-to-family" foods to kids of all ages will keynote the event. Foraker will

share wisdom from more than 30 years in the natural and organic food industry.

Educational sessions at OGS will range in topics, including:

- ▶ Scaling up healthy soil practices
- ▶ Sustainable investing in your organic farming future
- ▶ Technology is not just for "big ag"
- ▶ Managing organic production systems to promote plant health
- ▶ Giving organic beverages a shot
- ▶ Safeguarding the organic brand

Also unique to the schedule is the 2018 CannaBus Tour, created in collaboration with the Monterey County Cannabis Industry Association. The tour will take place on Wednesday, December 12 and is an exclusive opportunity to take a behind-the-scenes look at the Monterey County cannabis industry. This limited tour includes visits to a state-of-the-art, indoor cannabis growing operation and Indus, a vertically integrated cannabis extraction and manufacturing facility. With the growing, production, and consumption of cannabis now legal in California, Monterey County is poised to be a leader in the growing and manufacturing of cannabis and cannabis-related products.

On Wednesday evening, attendees have the opportunity to purchase tickets for the CCOF Foundation's "We Are Organic" dinner. This dinner celebrates all things organic—the growth of organic and stories from Future Organic Farmer Grant Fund recipients. Proceeds from ticket sales go to support the CCOF Foundation, which advances organic agriculture for a healthy world through programs that educate future organic farmers, help

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## *"These three deserving CCOF members are being recognized for their strong leadership within the organic sector."*

consumers understand organic, assist organic farmers in need, and provide ongoing training for organic professionals.

Growers won't want to miss the two "Meet the Grower" events, taking place on Wednesday and Thursday of OGS. These special networking sessions pair organic growers and farmers with buyers from leading retailer Costco Wholesale. This opportunity for organic growers is exclusive to attendees of OGS.

Attendee registration for OGS is \$499, with discounts available for CCOF members and individuals involved in government and education. Registration to OGS includes admittance to the opening reception, educational sessions, keynote presentations, all meal functions, and the trade show.

For more information on the Organic Grower Summit, visit [www.organicgrowersummit.com](http://www.organicgrowersummit.com).

## **OTA to Honor CCOF Leaders at Expo East**

The Organic Trade Association (OTA) will honor three outstanding CCOF leaders at its upcoming annual Organic Leadership Awards Celebration in Baltimore, Maryland on September 12, 2018 during Natural Products Expo East. Javier Zamora of CCOF-certified JSM Organics will receive the Rising Star Award. Stephanie and Blake Alexandre of Alexandre Family Farm will receive the 2018 Organic Farmers of the Year award.

"These three deserving CCOF members are being recognized for their strong leadership within the organic sector. Javier and the Alexandres are exemplary organic farmers who share a deep commitment to organic production and public service," said CCOF Executive Director/CEO Cathy Calfo. "These awardees give back to the organic community in many ways—from serving in CCOF governance positions to volunteering their time and resources to programs like the CCOF Future Organic Farmer Foundation. We look forward to celebrating with Javier and the Alexandres at the OTA awards celebration."

The Alexandres have been CCOF members since 2003. Stephanie, Blake, and their five children operate four grass-based organic dairies and run an organic creamery, manage a large-scale organic pastured poultry and egg operation, and raise pastured pork. Stephanie Alexandre served on the CCOF's board of directors for 10 years (2007-2017) and is an advisory committee member for the CCOF Foundation's Future Organic Farmer Grant Fund. The Alexandre family's dairy, poultry, egg, and pork operations exemplify organic livestock production that has scaled up without losing integrity and organic values. These diverse organic enterprises are living proof that strict compliance with the Organic Livestock and Poultry Practices

(OLPP) standard could be achievable for any size of organic producer.



Stephanie and Blake Alexandre of Alexandre Family Farm



Javier Zamora of JSM Organics

Zamora started farming organically in 2012 at the Agriculture and Land-Based Training Association (ALBA) on 1.5 acres. Today, Zamora farms over 100 acres on California's Central Coast and is a leading voice in his local organic community, where he serves as CCOF Central Coast Chapter President. Zamora frequently speaks on farmer panels and at events. He is a strong advocate for beginning farmers and is a member of the USDA Advisory Committee on Beginning Farmers and Ranchers. He sits on the boards of ALBA, the Ecological Farming Association, and the Pajaro Valley Water Management Agency.

OTA will also honor Margaret Scoles of the International Organic Inspectors Association with the Growing the Organic Industry Award. Scoles is a longtime organic leader who has been instrumental in training and educating professionals who conduct annual on-site inspections of certified organic operations. Her work has directly contributed to the strong integrity of the USDA organic label.

The awards celebration will take place during Natural Products Expo East.

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## *Fermenting Fever*

Based out of Boulder, Colorado, Ozuké Pickled Things is taking fermented foods to the next level. They combine unique ingredients (think beets with seaweed) with European, Russian, and Asian fermenting traditions to create one-of-a-kind living foods.

The company is run by Mara and Willow King, who came to the world of fermenting in different ways. Mara King is a chef and worked for a restaurant at a health spa, helping with macrobiotic dishes and fermentation. Willow King was inspired by her cheesemaking cousin, who provided her with a book on wild fermentation. What started as a mutual, at-home passion for health quickly grew to sharing creations with friends and family, then to selling at local farmers' markets, and eventually to having products in stores across the country.

I asked Willow King what the difference is between pickling and fermenting. She explained that in the United States, pickling is a process using vinegar, whereas fermentation uses salt and lots of time. Fermented products are alive and not shelf-stable. For this reason, Ozuké refrigerates all their products.

In addition to sauerkrauts, the company also produces kimchi, pickled vegetables, and pickled umeboshi. Kimchi was Ozuké's first product and remains their most successful. Willow King explained umeboshi as a preserved Japanese plum. Traditionally, this plum is used for medicinal purposes, such as for stomachaches, nausea, hangovers, and more. In the culinary world, umeboshi paste is sometimes used in sushi, cocktails, tea, or just eaten straight. Ozuké ferments an elephant heart variety of this plum, which is grown in Colorado.

When it comes to suppliers, Ozuké tries to source from small local farmers whenever possible. About 85 percent of their suppliers are local farmers. When searching for a local umeboshi plum source, they met a young farmer in Paonia, Colorado, who was in the process of transitioning to organic. They made a deal with the farmer to grow the umeboshi plums, guaranteeing the farmer an income and Ozuké a local source for this Japanese fruit.

Ozuké has been certified organic with CCOF for about five years now. Willow King says that from the beginning, they knew they would become certified organic. The mission of the organic movement aligns with the core ethos of their company. Their goal was to build a business that would support the organic movement and their community. The Kings are passionate about soil health, the environment, and the health of people. To foster a healthier community, they hold community classes in the Boulder area where they teach basic fermentation of water kefir, kombucha, kimchi, and other vegetable fermentations. If you're not in the Boulder area, you can also find recipes and videos on their website.

When asked about the future of their business, Willow King said they are looking at making vinegar-based beverages and expanding through the United States and beyond. To make the beverages, they would buy local produce that would otherwise go to waste and use it to make their product. They hope to reach a larger audience with the beverages.

While the company started in Colorado, it has rapidly expanded to California, additional regions of the Midwest, and the East Coast. Demand is growing fastest in New York, both city and upstate. Mara King, a native of Hong Kong, has also been approached by a potential overseas buyer.



# CCOF "Likes"

Member News Meets Social Media



**Bee Valley Farm** via Facebook:  
Onion planting



**House Kombucha** via Facebook:  
Entering the Los Angeles markets!



**Green Soul Farm** via Instagram:  
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**Moxxy** brought Josie's Organics to life. Retailers, shoppers and the media love the Josie's brand. It's been a big success so far and has a lot of potential for growth.

- Rod Braga



# JOSIE'S ORGANICS HAS MOXXY

# MOXXY!

marketing

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Willow King appreciates the work CCOF does to maintain the integrity of organic. She wants consumers to continue to have faith in the USDA "Organic" seal and what it means. Having gone through the organic certification process herself, she recognizes all the work involved in becoming certified and the oversight required from certifiers to ensure "organic" continues to mean organic.

Look out for Ozuké's unique ferments near you! Find out more at [www.ozuke.com](http://www.ozuke.com).

## Parker Pastures: Organic and Holistic Management

Parker Pastures operates on a straightforward motto: "A Healthy Earth. Happy Animals. Healthy & Happy People." Working toward this motto, the Parker family (Bill, Kelli, and their three children) run grass-fed Devon cattle and sheep on 2,500 acres of pasture in Gunnison, Colorado using the principles of organic and holistic management.

Bill and Kelli began using holistic management in 2001. As Kelli Parker describes, holistic management is the decision-making framework used by the operation to "make decisions that benefit the triple bottom line: the ecology of our landscape, the economics of our business, and our quality of life and community at large." By carefully planning their finances, ranch management, and grazing practices, the ranch is able to manage proactively for the outcomes they want to see rather than reacting to problems as they arise. Unlike rotational grazing, which often is based solely on livestock needs for a given season and follows preset grazing patterns and durations, holistically planned grazing places strong emphasis on pasture monitoring, plant recovery times, and the specific context of the ranch to ensure that livestock do not return to grazed paddocks until plants have effectively recovered.

Throughout their time as a grass-fed, holistically managed ranch, the Parkers have also been operating a low-input, non-synthetic operation. Thus, they decided to officially

add organic certification in 2016. Since then the ranch has marketed organic, grass-fed beef and lamb to customers throughout the state of Colorado. As most of their products are sold directly to consumers, many customers already had a robust understanding of the ranch's management practices. However, organic certification has opened new business opportunities as companies such as Pasture Provisions, a Colorado-based food delivery service, seek to source products from organic operations.

Truly a family-run business, the majority of the sheep are owned and managed by Bill and Kelli's 15-year-old daughter Cloe. Cloe Parker oversees the day-to-day care and pasture movements of the approximately 200-animal flock. The grass-fed lambs are harvested each fall and marketed under the Parker Pastures label. The sheep are often run together with the cattle in a "flerd" (combined flock and herd) to more effectively graze the pastures using one large group of animals.

To better serve their local community of ranchers, Parker Pastures is also a teaching and demonstration site for the Coldharbour Institute. The Coldharbour Institute is a nonprofit organization that educates Coloradan producers about regenerative land management practices. Parker Pastures' partnership with Coldharbour provides an avenue to promote, practice, and teach holistic management and organic systems to other agriculturists. As all land managed by Parker Pastures is leased, through both private leases and a creative lease with local government, the operation also provides an excellent example of how aspiring young producers can break into ranching without the necessity of owning acreage.

Describing holistic management and organic practices as a "beautiful dovetail," the Parkers combines these systems by using carefully planned grazing to build healthy soil along with organic practices to maintain thriving herds and in turn they provide their consumers with nutrient-dense, grass-fed meats: a healthy earth, happy animals, healthy and happy people.

Find out more about Parker Pastures by visiting [www.parkerpastures.com](http://www.parkerpastures.com). You can also find them on Instagram @parkerpasturesgrassfed.

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## ***Whole-Farm Revenue Protection Evolves to Better Serve Diversified Organic Growers***

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Running an organic farm business is not for everyone, and those who have done it successfully know firsthand that it takes grit and determination to take the leap in dedicating their livelihood to their farm or ranch. Even with a strong entrepreneurial drive, production savvy, and business skills, organic farmers can face challenges beyond their control that could make or break their operations.

In considering ways to protect a farm business, each farmer and rancher should answer for themselves what it is that they value the most from their career. What is essential for the business to have success, and how can you protect those vital assets? In many cases, there are various insurance products that can serve an organic farm or ranch to protect what is most valued. Today, new forms of insurance, like Whole-Farm Revenue Protection (WFRP), are being designed to meet the particular challenges faced by organic operations and can be a viable option for businesses to consider.

Years ago, organic and diversified growers had very few options for taking advantage of federal programs designed to support agriculture. It was a gap that contributed to many growers in California having little interest or stake in the federal farm bill. Thanks to leadership and advocacy from California growers and others around the country, those times have changed.

Rooted in commodity price support programs that go back 80 years, today's options have evolved to focus on subsidized crop insurance. It took a few years for the new approaches to evolve in ways that meet diversified growers' unique needs, and the progress is encouraging. Now organic farmers have options, and foremost among them is Whole-Farm Revenue Protection.

In June 2018, CCOF and California FarmLink produced an in-depth webinar, "Accessing Crop Insurance for Organic and Diversified Farms," that's now available online at [www.ccof.org/past-events-recordings](http://www.ccof.org/past-events-recordings). This webinar brought an organic grower, Freeman Barsotti, co-CEO of Capay Organic/Farm Fresh To You, together with two representatives from the USDA to talk about crop insurance program details and growers' experiences.

WFRP can help growers maintain a certain level of annual revenue despite risks from weather, pests, and other natural causes of lost income. While there are obligations and process that growers will need to manage, those efforts can ultimately strengthen your business for the long term. At most levels of insurance coverage, the federal subsidy covers 80 percent of the premium cost, and within it is an incentive for diversity that can provide valuable benefit for California growers. Growers should note that while WFRP covers income lost due to natural causes, the program does not cover loss of revenue due to non-natural causes such as broken equipment.

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# The CCOF Foundation's .....

# ORGANIC TRAINING INSTITUTE

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Through hands-on trainings, workshops, and seminars, the Organic Training Institute provides resources to aspiring and current organic professionals about the latest organic research and best production and marketing practices.

Trainings focus on topics requested by organic professionals, including organic recordkeeping, food safety practices, and more.

All event dates and locations are subject to change—check online for the latest details.

## OCTOBER 10, 2018

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*Online Webinar (in collaboration with the Western Center for Food Safety)*

### Getting Ready for the FSMA Agricultural Production Water Requirements\*

## NOVEMBER 7, 2018

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*Sonoma/Petaluma Region, CA*

### PSA-Approved Food Safety Workshop in English\*

## NOVEMBER 29, 2018

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*San Francisco, CA*

### San Francisco Wholesale Produce Market Tour

## DECEMBER 12-13, 2018

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*Monterey, CA (in collaboration with the Organic Produce Network)*

### Organic Grower Summit

## JANUARY 23, 2019

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*Monterey/Pacific Grove Region, CA (in collaboration with the Ecological Farming Association)*

### PSA-Approved Food Safety Workshop in English and Spanish\*

**Register for these events and more at [www.ccof.org/events](http://www.ccof.org/events) »**

\*These trainings are based upon work that is supported by the National Institute of Food and Agriculture (NIFA), U.S. Department of Agriculture, under award number 2017-70020-27242.

As a next-generation crop insurance product, WFRP could also be seen as a way to offset the effects of climate change. In the webinar, USDA Risk Management Agency staff cited an example from 2015 when a pistachio grower was impacted by a lack of chilling hours. The grower had two kinds of insurance, and WFRP returned the greater value of the two; they've used it ever since.

Barsotti reflected on his own experience with WFRP, and he encouraged growers to be ready to document and communicate problems that arise on the farm. He counseled growers to take pictures of crop damage, such as sunburnt bell peppers, insect damage, or other natural causes that impact your production and earnings, and be ready to explain how your typical management practices help to avoid such damage. Barsotti's WFRP experience was positive—likely due in part to a very strong recordkeeping system for his business, which USDA staff cited as some of the best records they had ever seen in the WFRP claims review process.

One key factor for growers to consider is that coverage is based on your own farm's historical numbers as illustrated on your IRS Schedule F (Profit or Loss from Farming), and not a general statewide price index by product. If you're a beginning farmer with 10 years or less of farming experience, you can establish your policy based on three years of tax records; others are asked to establish a revenue baseline by averaging the preceding five years. If you don't have three years of Schedule F records, your crop insurance agent can work with you to create a substitute as long as you have some records of farm revenue over three consecutive years.

Together with California FarmLink, CCOF encourages growers to view the webinar recording to determine how WFRP can meet your needs. Other materials are available through the National Center for Appropriate Technology (NCAT), including an upcoming podcast. They'll talk with farm risk management experts and authorized insurance providers about how WFRP can work for organic producers, and how farmer businesses can prepare to access the product. The podcast will be posted on the NCAT website at <http://attra.ncat.org/category/audio/>. You can also download NCAT's *Primer on Whole-Farm Revenue Protection Crop Insurance: Updates for 2018* at <http://attra.ncat.org/attra-pub/download.php?id=595>.

California's organic farmers and ranchers make up the most innovative and diverse farm business community in the nation, and WFRP may not be the solution for all businesses. No matter the result of your insurance coverage, the farm business recordkeeping and other business practices the WFRP relies on will strengthen your business. Programs like WFRP will continue to evolve and help make improvements to meet organic and diversified growers' needs.

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## *California to Create a Cannabis Certification Program*

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As California finalizes its regulations for recreational and medical cannabis, it will also establish a program to certify cannabis to standards comparable to the national organic standards. By 2021, the California Department of Food and Agriculture (CDFA) is mandated to offer a voluntary certification program for cannabis modeled after the National Organic Program.

## **Cannabis Remains Ineligible for Organic Certification**

CCOF often receives inquiries from growers interested in certifying their cannabis and cannabis products as USDA organic. Despite its legal status in California and other states, cannabis is not eligible for organic certification because it is listed as a Schedule I drug under the federal Controlled Substances Act. CCOF will not decertify operations that grow cannabis on certified ground as long as they follow organic standards and provide full documentation and transparency, just as they would for any other crop. More information about CCOF's policy on cannabis can be found at [www.ccof.org/organic-cannabis-certification](http://www.ccof.org/organic-cannabis-certification).

## **CDFA Must Create a 'Comparable Organic' Program**

In June 2017, California Governor Jerry Brown signed Senate Bill 94 (SB-94) into law. The bill merged the existing medical and adult use marijuana laws into a unified and streamlined piece of legislation. A provision included in the law mandated CDFA establish a certification organic designation and organic certification program for adult-use cannabis and cannabis products by January 1, 2021.

The provision requires that CDFA create a program for cannabis "that is comparable to the National Organic Program (NOP) and the California Organic Food and Farming Act (COFFA)." If the NOP authorizes organic designation and certification for cannabis, the program will become inoperative and repealed by the following year.

Comparable organic certification programs are not new to cannabis. Private third-party organizations have been certifying cannabis and cannabis products to their own standards for years. Often the private certifications run parallel to the national organic standards.

The Washington State Department of Agriculture (WSDA) is also establishing a comparable organic certification program for cannabis producers in Washington. Washington's program was mandated through the passage of Washington Senate Bill 5131 a month before SB-94.

In early 2018, the California Organic Products Advisory Committee (COPAC) approved a motion recommending to



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## *CalCannabis will hold stakeholder meetings across the state and have public commenting opportunities.*

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California Secretary of Agriculture Karen Ross that CDFA consult with COPAC on the development of a program for cannabis that is comparable to the NOP and COFFA, pursuant to SB-94.

COPAC's existing structure as an advisory committee to the California State Organic Program (SOP) and its expertise in organic production would be of benefit to CDFA's comparable organic program. As the program's advisory committee, COPAC could ensure that the program is properly aligned with organic principles and practices. COPAC could advise on ensuring the organic integrity of the program, leverage the expertise of the organic community, and assist in streamlining regulations for certified organic producers.

Over the summer, the three cannabis licensing agencies in California released their proposed permanent regulations. CDFA's comparable organic program will require compliance with the permanent cannabis regulations and be an add-on certification for cannabis cultivation licensees.

### **CCOF at Work**

CCOF has been monitoring cannabis regulatory developments and advocating for streamlined oversight for certified organic producers.

CCOF submitted written comments to CDFA's CalCannabis Licensing Division that encouraged the agency to accept existing recordkeeping from certified organic producers incorporating cannabis cultivation into their operations, require cannabis producers to use cultural pest management methods, encourage the use of organic-approved pesticides, and coordinate enforcement activities between the SOP and CalCannabis.

CalCannabis' regulations include a required cultivation plan and recordkeeping that functions similarly to an organic producer's Organic System Plan. CCOF advocated that when recordkeeping requirements match, CalCannabis should accept an organic producer's existing records. Accepting existing records from certified organic producers would not create duplicative paperwork between a producer's organic certification and cannabis licensing.

The proposed cannabis regulations also include environmental protection standards. The regulations require licensees to create a pest management plan which includes integrated pest management protocols but does not require their use. CCOF commented that CalCannabis should strengthen the standards by requiring cannabis producers

first use cultural pest management methods and only resort to pesticide use when cultural methods have not been successful.

In addition, the regulations include pesticide use requirements such as applying the minimum amount of pesticides when necessary, preventing pesticide drift and contamination of surface and groundwater, and not applying pesticides when pollinators are present. Encouraging the use of organic-approved pesticides would satisfy these additional pesticide use requirements and bolster the environmental protection standards.

CCOF also recommended the expansion of existing CalCannabis coordination for inspections, investigations, and audits with the California Department of Fish and Wildlife and the State Water Resources Control Board to include coordination with the SOP. Coordination with the SOP would ensure CalCannabis' enforcement activities do not duplicate or conflict with the SOP enforcement activities and that SOP inspections occur at the same time as cannabis inspections or vice versa. Coordination with the SOP would maximum CDFA's resources and limit the burden of compliance for organic producers.

Lastly, CCOF advocated that organic producers should be given priority for applying for cultivation licenses. Organic farmers share CalCannabis' environmental protection goals and maintain similar recordkeeping requirements for their organic certification. Organic farmers have proven commitments to protecting public and environmental health through voluntary organic certification.

CCOF staff met with CalCannabis to discuss the comparable organic program in May. CalCannabis is focused on finalizing the permanent cannabis regulations and has begun research into organic production to inform their work on the program.

### **How to Get Involved**

CalCannabis will hold stakeholder meetings across the state and have public commenting opportunities throughout the development of the program. CCOF will share updates on the comparable organic cannabis certification program through our weekly email newsletter and our blog. If you are a certified organic grower who would like to use CDFA's forthcoming certification program, now is the time to make your voice heard and advocate for a streamlined, fair program.

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A close-up photograph of a person's hands holding a vibrant bouquet of pink flowers. The person is wearing a dark blue t-shirt and a white patterned hat. The background is a bright, sunny outdoor setting with green foliage and a clear blue sky. The text is overlaid on the left side of the image.

**THE FUTURE  
OF ORGANIC  
FARMING  
IS IN OUR  
HANDS**



# Five Years of Supporting Future Organic Farmers

WRITTEN BY Melody Meyer

It was just five years ago that a group of like-minded funders began meeting to share best practices, insights, and favorite projects. We had the notion that we could make a bigger impact together than any one of us could alone. Which area should we focus on?

We realized that we had an aging population of farmers along with significant barriers associated with becoming an organic producer. It became obvious that we should come together and focus on growing the next generation of organic farmers.

Luckily, Cathy Calfo, CCOF's executive director/CEO, was on those calls. She sprang into action and ran with the idea to the CCOF Board of Directors, who in 2013 embraced the creation of the Future Organic Farmer Grant Fund (FOFGF) through the CCOF Foundation.

Calfo's vision was the driving force. "Organic agriculture holds enormous promise for our food system and economy," she explains. "Delivering healthy organic food and its benefits to more and more people over time requires a business infrastructure that supports organic production methods—including new organic producers. Our vision is to inspire and train a next generation of organic producers. It is amazing to realize that after just five years, the program has touched more than 33,000 teachers and students!"

The FOFGF is the first-of-its-kind collaboration of organic businesses and leaders coming together to support the education of the next generation of organic farmers, ranchers, and food processors.

## Crafting a Unique and Impactful Program

The FOFGF is the only fund in the nation that provides educational grants exclusively to students and teachers of organic agriculture.

The grants are strategically made in three specific areas that target different age groups: kindergarten through eighth grade (K-8) teachers, high school students who are part of the National FFA Organization (FFA), and vocational and higher education students.



St. Thomas More Academy student



The alliance with FFA is especially unique. There is no other program engaging the largest agriculture educational organization in the country to encourage an organic curriculum. Without the CCOF Foundation's direct engagement with FFA, organic would not have a presence in developing leadership talents in a broad range of agricultural career pathways.

Each of the three areas focus on reaching teachers in low-income communities and students from disadvantaged backgrounds. A full 59 percent of the K-8 grantees and 40 percent of the higher education students have been from underserved or disadvantaged groups—students who might not otherwise have exposure to organic education.

## Time Flies—Five Years of Impact on Growing Organic Futures

Between 2014 and 2016, a total of 69 grants went to K-8 teachers with a total of \$62,033 in funds. The high school/FFA program received \$48,000 with 48 grants, and a full \$157,500 went to higher education students with 63 grants awarded.

By the end of 2017 the CCOF Foundation had received more than 762 applications and distributed more than \$400,000 dollars.

The fund has made 246 grants in 35 states across the country impacting more than 33,000 students, teachers, and families.

None of these future organic professionals would have had the support for their organic educations without the vision and leadership that the CCOF Foundation provided in this critical area of need.

## The Best Impact can be Measured in Words

On this five-year anniversary of the fund, I wanted to reach out to some of the grant recipients and hear their stories. It wasn't hard to get heartfelt responses to my inquiries.

**Kate Kirkpatrick** is an instructor in humanities and agricultural arts at St. Thomas More Academy in North Carolina. She has five FFA students who have received FOFGF grants from CCOF over the last three years for their Supervised Agricultural Experience (SAE) projects.

"Each one of these students has grown in different ways because of their grants," she said. "Most notably, two of them have begun to direct their studies toward a college career in agriculture. A third has started mentoring younger FFA members to take over her at-school project when she graduates. It has boosted the confidence of these kids and given them the hope that the future of their world is not set in stone. They can pursue ethical and viable careers in agriculture. Most likely none of them would have pursued their project ideas further without funding from CCOF."

Positive effects on the community are evident in Kirkpatrick's eyes. "Each grant project has impacted the community in different ways. The two greenhouse projects have created a bustle around our community by growing and selling organic plants and produce. Because of their success, other students are considering new projects for this year and next. Parents are also more willing to approve of their kids' projects that are larger in scope and scale," she explained.

The program has had an impact on Kirkpatrick too. "Helping students apply for and win these grants has helped me professionally," she said.



Happy Valley School student



The University of California, Santa Cruz's Center for Agroecology and Sustainable Food Systems (CASFS)

*"I have been personally edified at seeing the hard work of my students and that professionals in the field value their education and experiences. It is truly inspiring. Plus, I get to brag about my awesome students!"*

**Deborah McArthur** is a parent volunteer at Happy Valley School in Santa Cruz, California. She prepared and managed the K-8 grant they received from the CCOF Foundation. With the help of the FOFGF grant, the entire school population of kindergarten through sixth grade students participated in the planting, care, and eating of an all-school organic salad.

"Each grade was responsible for growing (from seed to harvest) one part of the salad," McArthur explained. "Students learned the nutritional value of each vegetable as well as the particular needs of the plant their grade was responsible for growing."

Each class engaged in age-appropriate activities: third through sixth grade students tested the soil, prepared planting areas, and managed the compost system. The younger grades weeded and mulched garden beds. Each grade planted and cared for their part of the salad.

"We really needed startup funding," McArthur said. "The garden had been dormant for seven years and there was no kitchen space to prepare food. Having this money to start the project was super important to motivating our parents to participate and make it all happen. We now have regular parent work days, so they can see the potential and get behind rejuvenating the garden space."

"This project created real community beyond the garden," continued McArthur. "Our goal is to continue to create experiential learning opportunities for all classes through planting, maintaining, harvesting, and enjoying the organic vegetables grown in our school garden."

**Makshya Tolbert** is a higher education FOFGF grant recipient who is currently an apprentice at the University of California, Santa Cruz's Center for Agroecology and Sustainable Food Systems (CASFS). The program spans 1,000 hours of in-field and classroom training and instruction, and topics range from principles and practices of organic agriculture to issues surrounding farm labor, food policy, equity issues, and sovereignty movements.

"Before farming, I was working in environmental philanthropy and specifically funding regional food systems, based in New York City," Tolbert said. "I took a pause from philanthropy to pursue organic farming because I wanted a more transformative lens through which to re-evaluate the relationships we in the food movement have to each other." Tolbert says she was drawn to the CASFS program because it is a model that values food sovereignty and racial justice as part of the principles of growing food.

"The history of food and farming has always diminished the many roles women of color play across our food systems," she continued.

*"Organic farming and the 'food movement' as a whole continues to perpetuate the notion that people of color in the food systems are more beneficiaries of good food than producers, purveyors, and entrepreneurs. It feels good to see myself and be seen as a confrontation with that myth."*



Lehia Apana

Tolbert is now part of the growing network of beginning organic farmers, and finds tremendous value in being part of that community. “There is no abundance of young farmers in the United States, so one of my takeaways is a greater understanding of the value of building community and relationships with other young farmers here and across the United States,” she explained.

## Building Soil and Creating Livelihoods—Grant Recipients Today

Grant recipients often go on to change the culture and impact the community with their organic education. As the fund invests in the recipients, they in turn invest in their neighbors, local land and wider community, spreading the impact of organic farming to regions across the United States.

**Lehia Apana** is a higher education grant recipient now farming in Hawaii. Apana and her husband own a three-acre property on Maui in Waiehu, a small town that’s part of a larger area that has historically been considered Maui’s “breadbasket” because of the abundance of its food crops.

The property and her farming endeavors have also helped Apana get in touch with her ancient roots. “When we purchased our property, about one year ago, it was covered in 8-foot-long Guinea grass. As we cleared the land to prepare for farming, we were surprised and delighted to find that the traditional-style terraces used for growing kalo (taro) were still intact! From a Hawaiian perspective, kalo is more than food—it’s identity. The Kumulipo, or Hawaiian creation chant, tells of Hāloanakalaukapalili, the stillborn son of Wākea (Sky Father) and Ho’ohōkūkalanī. From his grave grew a kalo plant,

nourishing a second child to whom all Hawaiians trace their roots,” she said.

*“As a Native Hawaiian growing kalo, I am proud to promote agriculture and culture.”*

Through the grant program, Apana is supported in sharing this historical Hawaiian crop with her community and reconnecting them with a lost art of agriculture.

After **Jesus Alcauter** graduated three years ago, he purchased 27 acres of raw land in Central Texas to raise livestock. He told me, “Since then, my wife and I have built our own small house, put up goat fencing, built chicken tractors, and created a small market garden for growing crops. I am originally from Mexico and I worked for several years with my father and brothers growing vegetables and raising animals in south-central Mexico, which is where I developed my love for agriculture.

“Mexican culture has a deep appreciation for whole foods, herbs, and humanely raised meat and animal products, and it is my dream to provide organically produced food year-round to the large immigrant community here in Texas at a reasonable price.”

Alcauter found a niche in the local market selling products with a hint of home to immigrant neighbors. He currently sells meat, eggs, and Mexican herbs and chilies but plans to expand into more organic vegetables.

**Joshua Dransfield** is one of this year’s higher education grant recipients. He said, “Much of my academic life has been immersed in the field of North Carolina agriculture. Growing up, I was involved in community and school programs like 4-H, equine rescues, and FFA, which provided me with a foundation



Jesus Alcauter



Joshua Dransfield

and a desire to seek a career in a field where I'm working with people, animals, and the environment."

Today, Dransfield works full time on his family's organic dairy farm, Windspring Farms, feeding cows and heifers, cropping, milking, and repairing machinery. He is also a rising senior at the University of Tennessee at Martin's (UTM) online farm and ranch management bachelor's degree program.

"The CCOF grant funds have helped me tremendously by allowing me to go to school full time and still work on my family's dairy," Dransfield explained. "The grant funds I have received go directly to help with expenses related to furthering my education. The education I'm receiving will help me advance our farm, make good decisions, and learn more about organic strategies for dairy production. At the end of my senior year I also want to do an internship on an organic grazing dairy to learn more about pasture management."

Through his college classes, Dransfield has learned about the way economics drive dairy and commodity prices. Learning about the economic drivers that can impact a farm business's success will set Dransfield up for making good business decisions in the future.

"Organic production makes perfect sense economically and environmentally," he said. "I love talking about organic dairy production, and for one of my classes at UTM I produced several YouTube videos on the importance of treating our environment kindly, especially in agricultural production.

*"I really like to talk about our transition to organic dairy production and organic dairy treatments to folks in the conventional dairy sector as well as local farmers."*

After he graduates, Dransfield hopes to begin a career in sustainable agricultural practices by becoming an extension agent with North Carolina Cooperative Extension to help spread his knowledge about organic agriculture and its many benefits. "North Carolina is blessed with many opportunities for healthier food systems, and I believe that through my work as an extension agent, I can make these opportunities more accessible to all North Carolinians," he said.

## Get Involved with the Transformation of our Agricultural Landscape

Let's face it—we all know that there are fewer young people going into agriculture. Many of us are concerned about the future of American farming. We need new organic farmers and entrepreneurs to meet the demand for organic products that are healthy for people and the planet.

Calfo says, "This year an independent program evaluation identified 75 percent of vocational and higher education grant recipients as reporting that they started farming organically or working in the organic sector since receiving a Future Organic Farmer Grant. What's next is a next generation of organic producers, and the one after that, and the one after that!"

You can be part of cultivating that next generation by supporting the work of the Future Organic Farmer Grant Fund. Simply contact [ccofoundation@ccof.org](mailto:ccofoundation@ccof.org) or call (831) 423-2263. You can learn more about the program and its recipients at [www.ccof.org/fogf](http://www.ccof.org/fogf).

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## ***Why Does Chapter Leadership Matter?***

At CCOF we are inspired by our members' commitment to participate in the collective effort to strengthen the organic sector. CCOF is a member-based organization made up of 15 chapters. Each chapter elects a representative to the CCOF, Inc. Board of Directors.

The role of the board of directors is to govern CCOF by selecting and directing the CEO, maintaining strong fiduciary practices, and advancing the organization's mission, which is to advance organic agriculture for a healthy world through organic certification, education, advocacy, and promotion. The CCOF Board of Directors appoints a management committee to oversee the affairs of CCOF Certification Services, LLC and a board of trustees to oversee the CCOF Foundation.

CCOF chapters also elect local leaders, such as a chapter president, who organize networking opportunities through chapter meetings. These meetings give members an opportunity to hear about and weigh in on CCOF advocacy campaigns as well as learn more about opportunities with the CCOF Foundation.

## **Chapter Elections Update**

### **Big Valley Chapter**

We would like to congratulate and welcome the new CCOF Big Valley Chapter President Kathleen Schwallie of Blue Egg Farm, new Chapter Vice President Allie Cecchini of First Generation Farmers, and new Chapter Board Representative Chad Crivelli of Live Oak Dairy. We would also like to thank outgoing chapter leaders Brad Samuelson, Bill Thompson, and John Lagier for their years of dedication and continuing support.

### **Central Coast Chapter**

We would like to congratulate and welcome the new CCOF Central Coast Chapter President Javier Zamora of JSM Organics and new Chapter Secretary Lori Fiorovich of Crystal Bay Farms. We would also like to thank re-elected leaders Chapter Vice President Toby Garrone of Far West Fungi, Chapter Treasurer Christine Coke of Coke Farms, and Chapter Board Representative Grant Brians of Heirloom Organic Gardens.

### **Mexico Chapter**

We would like to congratulate and welcome the new leaders of the CCOF Mexico Chapter: Chapter Board Representative Esteban Macias of Grupo U, Chapter President Sergio Salgado Vidal of Viñas del Sol S.A. de C.V., Chapter Vice President Paola A. Guerrero of San Jose y Su Agricultura, Chapter Treasurer Mariana Perez of Red Sun Farms, and Chapter Secretary Juan Escalante of Nature Sweet/Bright House Organics Invernaderos. We would also like to thank outgoing chapter leaders Ed Morales and Lois Christie for their time and effort over the last few years as chapter leaders.

## **Pacific Southwest Chapter Hosts Event on Food Procurement Programs**

The Pacific Southwest Chapter partnered with the Farm to Institution Center, a division of Community Health Improvement Partners (CHIP), to host an event on marketing local food. CHIP connects local farmers, distributors, institutions, businesses, local government, and fellow advocates to grow the market for healthy, fresh, sustainable, local food through institutional procurement programs.

## **CCOF Board of Directors Forms At-Large Chapter**

Recognizing expansion of farmer membership beyond California borders, the member-elected CCOF Board of Directors voted to establish a fifteenth seat on the board that will be elected by the 220 farmer members in the United States whose operations are outside of California. The newly formed At-Large Chapter will hold its first election this fall, and the chapter's elected board representative will be seated at February's board meeting. Members of this chapter have received communication about this process and a call for nominations. If you are in this chapter, please keep a look out for an email with voting instructions to make sure your voice is heard.

***We look forward to seeing you at one of the next CCOF chapter meetings!***

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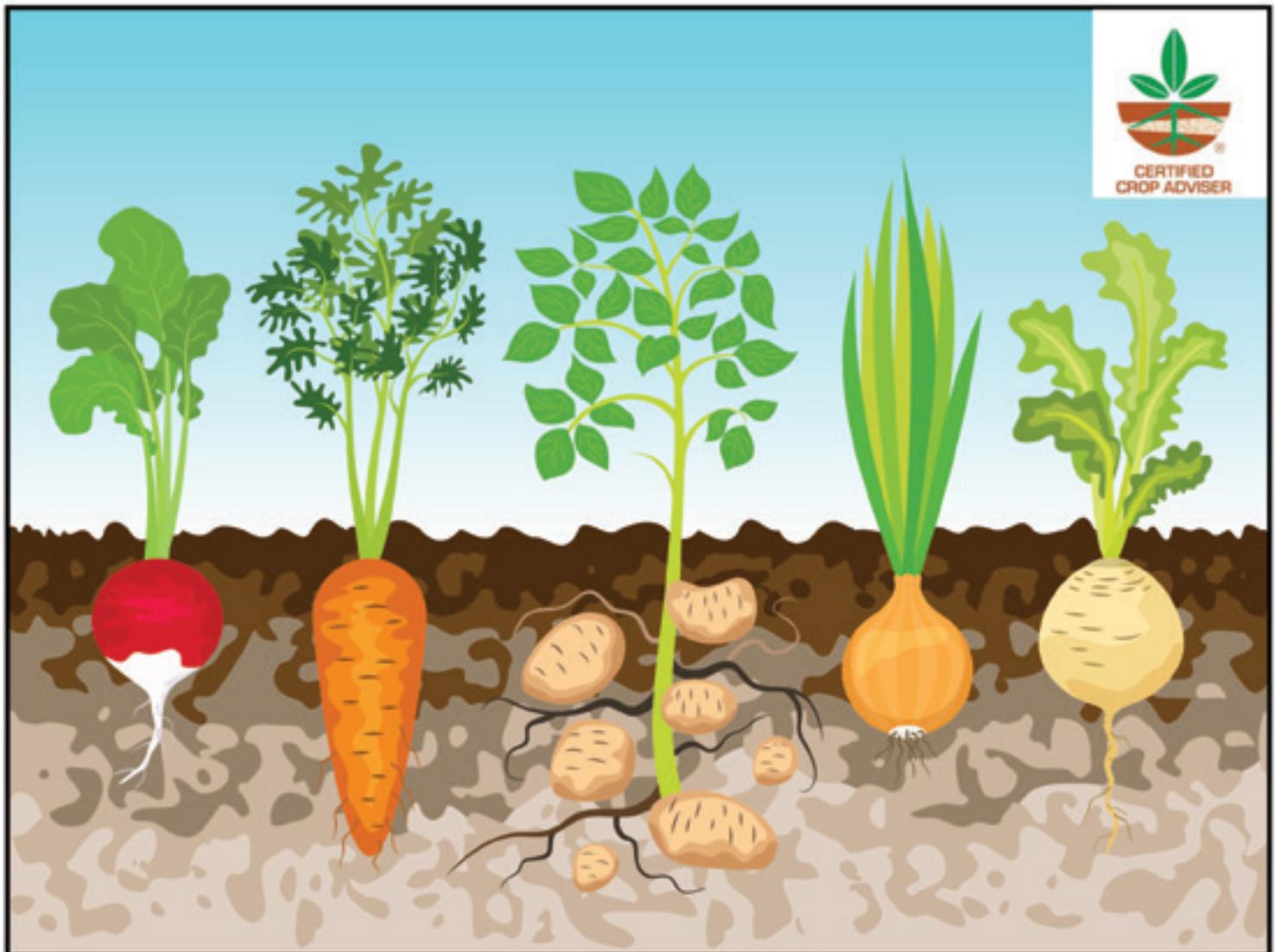
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## ***Welcome to Stellar and Demeter USA Operations***

In June we learned that Stellar Certification Services—the organic certification arm of the Biodynamic certifier, Demeter USA—would surrender its accreditation. We quickly forged a partnership with Demeter and worked to provide an orderly process and safe option for Stellar’s certified organic operations. This process has been heartwarming and positive as we’ve gotten to know the dedicated organic farmers and processors involved.

Our partnership with Demeter continues as we work with their inspectors to perform dual organic and Biodynamic inspections. Initially we thought we’d only achieve this in 2019, but with hard work and determination, we found opportunities in 2018 and performed a number of these inspections as early as July!

Now, as we move forward, we wish to extend our warmest welcome to formerly Stellar-certified operations. Now that you’re a part of CCOF, we invite you to get engaged with our membership opportunities, chapters, and other events, such as the CCOF annual meeting and conference next February. Visit [www.ccof.org/chapters](http://www.ccof.org/chapters) for more information on how to get involved with your local chapter.

## **Renewals are Coming**

Every year, certified operations are required to submit an annual certification renewal contract and pay certification fees for the next year. In early November, we will mail your renewal package—the contract and invoice—as well as send you an email with your renewal information.

Completing your renewal on time allows us to group inspections so they are as cost-effective and timely as possible throughout the next year. Help us serve you and other operations efficiently, and avoid unnecessary costs, by completing your contract and submitting payment by January 1.

You can submit your contract and fees by mail, or through our online contract and payment portal at [www.ccof.org/renew](http://www.ccof.org/renew). You can also complete your contract and pay your invoice through the “Renew now” and “Pay now” buttons in MyCCOF.

### **Renewal Timeline:**

#### **November**

Renewals sent by email and USPS mail.

#### **January 1, 2019**

All renewals and annual payments are due.

#### **February 15**

A Notice of Noncompliance and a \$150 late fee will be issued to all operations that have not completed the renewal process (contract and payment). This is also the last day to withdraw from certification without being charged 2019 certification fees.

## March 15

A Notice of Proposed Suspension and an additional \$150 late fee will be issued to all operations that have not completed the renewal process.

## April 15

All operations that have not completed the renewal process will have their certification suspended. If your certification is suspended and you wish to be certified organic in the future, your certification must be reinstated by the National Organic Program (NOP) after a costly and lengthy process. We don't want this to happen to you, so renew as soon as you can!

CCOF is happy to help you set up a payment plan if needed. Please contact our accounting department at [accounting@ccof.org](mailto:accounting@ccof.org).

# CCOF Launches Innovative Pasture Compliance and Feed Audit Inspection Program

*Originally appeared in the online CCOF Certification News on July 2, 2018.*

To support organic integrity and ensure compliance with the National Organic Standards pasture rule for ruminant animals, CCOF is introducing a new Pasture Compliance and Feed Audit inspection program (PCFA).

## Background

On May 15, 2017, CCOF published a Certification News article titled "Dairy Grazing Season Clarification." This notice reiterated expectations for certified operations, in addition to identifying areas where we planned to add additional focus in the next year. In addition, the National Organic Program (NOP) published an Organic Oversight and Enforcement Update on May 24, 2018, which announced the initiation of a pasture surveillance project in which the USDA conducts unannounced visits to assess compliance with the pasture standards. CCOF's program will allow us to support the NOP's efforts and provide more robust information if requested.

CCOF has always taken compliance with the pasture rule very seriously and will continue to do so. CCOF pioneered the Livestock Unannounced Compliance Initiative inspections (LUCI) and has used these to ensure verification of grazing and other management practices. These LUCI inspections

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## *To support organic integrity for ruminant animals, CCOF is introducing a new Pasture Compliance and Feed Audit inspection program (PCFA).*

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will continue as they provide a type of observation that is not possible with a scheduled inspection. However, in our assessment, and in conjunction with the NOP's initiative, CCOF found a need for an additional schedule-based inspection option that is focused on an area that is difficult to fully assess in the context of a single annual inspection per year.

### **The Program**

The PCFA inspection program launches July 1, 2018 and is an improved approach to pasture rule compliance. We will perform between one and three additional pasture-rule-focused inspections at operations whose complexity, sophistication, and/or climate place them at increased risk for noncompliance. We expect to perform somewhere between six and 10 of these inspections overall at fewer than 10 operations each year, with flexibility as we learn throughout the process.

For more information, read the full article online at [www.ccof.org/PCFA](http://www.ccof.org/PCFA).

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### **Import Requirements for Operations in the United States**

Over the last year, CCOF has worked with importers, the USDA National Organic Program (NOP), and others to strengthen the integrity of organic imports. Over the coming year, we will be implementing increasingly robust importer certification programs to allow us to effectively review import systems and identify importers of various goods and commodities. In the interim, the NOP has been updating the organic community regarding existing policies and best practices.

Any CCOF-certified importer or CCOF-certified operation sourcing imported products from uncertified importers, brokers, traders, wholesalers, or distributors must be prepared to provide detailed information about imported shipments during inspections. An importer is anyone who directly imports; in other words, the importer of record. Importers must meet the expectations of NOP Interim Instruction 4013 on Maintaining Integrity of Organic Imports, NOP Policy Memo 18-1 on Impact of Fumigation and Irradiation Requirements, and NOP Policy Memo 18-2 Impact of Prohibited Grain Seed Regulations. Fumigated or irradiated product is not eligible for sale as organic and certain products from specific countries are not allowed to be imported into the United States, even if untreated.

If you import or purchase imported products from an uncertified importer, broker, trader, wholesaler, or distributor, you must request and maintain documentation showing that

products were not fumigated or irradiated. Be prepared to address the following at your inspection:

- ▶ Keep import certificates and transaction certificates available for review during inspections. This includes NOP Import Certificates for products from the EU, Japan, Korea, or Switzerland and TraceNet Certificates for products from India.
- ▶ Make sure documents state the organic status of the product whenever possible. CCOF understands that not all governmental or inspection bodies will designate products as organic; however all certified operations should clearly indicate when products are organic.
- ▶ If you purchase organic goods from uncertified importers or brokers, Uncertified Handler Affidavits (UHA) may be required. Blank UHA documents can be found at [www.ccof.org/documents](http://www.ccof.org/documents). Documentation must link back to the last certified handler.
- ▶ Review APHIS Guidance and know your conditions of entry before you purchase imported organic products. Inspectors will look for Import Permits to see if any conditions of entry require treatments that may be prohibited for organic. Relevant APHIS guidance can be found at [www.aphis.usda.gov/aphis/ourfocus/planthealth/complete-list-of-electronic-manuals](http://www.aphis.usda.gov/aphis/ourfocus/planthealth/complete-list-of-electronic-manuals).
- ▶ Keep documentation regarding treatment for pests or pathogens at all border crossings and through the supply chain. Inspectors will look for Phytosanitary Certificates to see that shipments were not treated, Emergency Action Notification form 523A for treatment at port of entry, Certificate 203 for irradiation, and other documents where treatment or fumigation of imports may be disclosed.
- ▶ For any fumigated or irradiated product, maintain documentation showing that the product was not sold as organic.

As organic trade spreads globally and imports increase, we look forward to working together to ensure that protocols are robust and we deliver the highest level of organic integrity to consumers.



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