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Maintaining a Strong Labor Force

"We don't have enough people to work, to pick our berries, to pick our vegetables ... They're not here and they're not coming anymore."

—Javier Zamora, JSM Organics

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CAN BE USED IN ORGANIC PRODUCTION

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We want to learn from you.

I do my best to spend time talking directly with growers about their challenges. I want to know what puts organic growers and their businesses at risk, and what prevents growers from transitioning land to organic production. The most persistent and perhaps most daunting challenge I hear about is access to a stable labor pool.

In this issue's feature article, writer Alessandra Bergamin shares the perspectives of growers who struggle to secure enough workers to keep up with their production needs. She introduces us to key immigration and labor policies and allies like the California Farm Bureau Federation, who are advocating for solutions and pushing our policymakers to act.

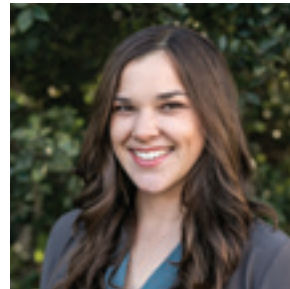
The mere mention of immigration policy evokes passionate opinions and heated debates. But most agricultural players can agree that we need a viable, legal path for workers to support our domestic agricultural production needs. Current policies, including the lack of a viable guest worker program, put agricultural workers in a continual state of uncertainty, which in turn damages their personal well-being and causes turmoil in our communities.

I also want to acknowledge the overall living and working conditions of our agricultural workforce. Despite their physically demanding and skilled work, farmworkers are among the lowest paid workers in the country. As the feature article notes, farmworkers often struggle to afford housing and the same quality of life enjoyed by other professionals.

CCOF's *Roadmap to an Organic California: Benefits Report* (available at www.ccof.org/roadmap) highlights studies that show how organic agriculture promotes better living and working conditions. Most significantly, organic agriculture reduces exposure to cancer-causing pesticides experienced by farmworkers and their families. Also of note, but less studied, is evidence that organic farms tend to provide more year-round employment and higher wages.

We at CCOF know that our innovative, forward-thinking organic community can do even more. We have had several engaging guest speakers at our events and governance meetings to help us better understand social fairness certifications and strategies.

We want to learn from you. Are you talking with your elected officials about immigration and labor policies? How do you support sound working conditions on your farm or in your facility? Tweet us @CCOFOrganic with your ideas and solutions. We're listening.



Kelly Damewood

Kelly Damewood
CCOF CEO

Issue Contributors

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Alessandra Bergamin is an Australian freelance journalist based in Los Angeles. She reports on immigration, public health, and environmental justice for *National Geographic*, *The New Yorker*, and *Harper's Magazine*. She is a 2019 University of California, Berkeley Food and Farming Fellow.



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Organic Seed: Strengthening Compliance through Guidance

After almost three years of work on the issue, the National Organic Standards Board (NOSB) unanimously approved a proposal called Strengthening the Organic Seed Guidance at its 2019 meeting.

The goal of the organic seed proposal was to improve the practices required of both certified parties and certification agencies to ensure more uniform compliance to the NOP rule §205.204, which states

(a) The producer must use organically grown seeds, seedlings, and planting stock: *Except* that,

(1) Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available: *Except*, That, organically produced seed must be used for the production of edible sprouts;

At the fall 2018 meeting of the NOSB, an addition to this section was adopted unanimously:

(i) Improvement in searching, sourcing and use of organic seed must be demonstrated every year with the goal of using only organic seed and planting stock.

The main provisions of the new recommendations are:

- On-farm variety trials will be considered a viable way for producers to document organic variety and cultivar equivalency (or lack of equivalency) to non-organic varieties and may be listed as one of the ways a farm attempted to source organic seed. Farmers can provide documentation of variety trials or of seed searches at their annual inspection.
- Evidence of efforts made to source organic seed may include demonstrating an increase in the percentage of organic seed sourced over time. Although the minimum number of sources to request organic seed is still three, the certifier can ask for additional sources to be contacted if there is a failure to demonstrate improvement.
- If a specific seed variety is mandated by the buyer or final handler of the crop, responsibility for documenting the seed source rests clearly with the producer who grows the seed. When buyers or handlers provide a grower with seed, the grower must obtain seed sourcing information from the buyer/handler.
- Certifying agents can ask for corrective action plans and require that a grower seek out additional seed sources if progress is not demonstrated in sourcing organic seed. Repeated lack of progress will result in noncompliance.

The NOSB's recommendations will not become effective immediately. They will be incorporated into the National Organic Program's (NOP) official guidance document, *Guidance on Seeds, Annual Seedlings, and Planting Stock in Organic Crop Production* (NOP 5029), then the NOP must make formal rule changes to reflect the new requirements.

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Serve the Organic Community through CCOF's Certification Management Committee

Are you a member of the organic food industry, but not certified by CCOF? Do you want to get involved with CCOF at the governance level? Are you a CCOF member who knows someone who may fit this criteria?

The CCOF Board of Directors is seeking applications from individuals for appointment to the CCOF Certification Services, LLC Management Committee, which they will review at their November meeting. The LLC Management Committee is appointed by the board and has the responsibility to control and manage the business and affairs of CCOF Certification Services, LLC.

The board looks for applicants who have a background in the organic industry (preferably with an understanding of organic certification) and who have experience in business management, including human resources, financials, and program management. **It is important to note that CCOF-certified members are not eligible for appointment to the LLC Management Committee.**

Committee members are appointed for three-year terms. While committee members are not compensated for their participation, they are reimbursed for their CCOF-related expenses. The LLC Management Committee meets once quarterly throughout the year, with other meetings and events occasionally scheduled as needed.

Download an application to serve on the LLC Management Committee at www.ccof.org/LLC-apply. Once completed, applications can be emailed to ccof@ccof.org. Read more about our structure on our website at www.ccof.org/structure.

CCOF members—this is an opportunity to recruit someone you trust to oversee your certification business! Help us spread the word!

EcoFarm Conference Turns 40!

From humble beginnings as a meeting of about 45 organic farmers at the Winters Fire House in 1981, the Ecological Farming Conference will celebrate its fortieth anniversary in January 2020.

Back in 1981, there was no information available about organic production, and organic farmers were few and far between.

Thanks to the efforts of Martin Barnes (an early CCOF member from Capay Organic) and Amigo Bob Cantisano (then of Peaceful Valley Farm Supply), a gathering for organic farmers was organized featuring one guest speaker, Everett (Deke) Dietrick, an expert on beneficial insects. Most of the day was spent sharing information between farmers, and it was so successful that everyone wanted to do it again. Attendance and the value of resource sharing in the organic community grew at each subsequent meeting.

Today, the annual EcoFarm Conference has grown to more than 1,700 attendees and offers a selection of more than 60 workshops, inspiring keynote speakers, farm tours, multiple opportunities for networking, delicious organic meals, special events such as organic wine and beer tastings, an exhibitor tent, an annual seed swap, a healing center, and the opportunity to meet one-on-one with experts on a variety of topics.

Was it 20/20 vision forty years ago about the importance of organic that will now result in the 40th conference in 2020? Unlike many of the other “industry” conferences that have sprung up in the last decade or two, EcoFarm maintains the personal connection that farmers have to the earth, to their land, and to each other. EcoFarm has managed to stay vibrant and relevant for growers who want the latest in production methods for organic, activists who want to stay informed on issues facing organic, everyone who wants to buy and sell organic food, and anyone who wants to learn how to steward the earth with sustainable and ecological methods.

The theme for the upcoming EcoFarm Conference is “2020 Vision - 40 Years & Still Growing” and will be held January 22-25, 2020. The EcoFarm planning committee will be working hard on the next agenda this summer. More information will become available and registration will open in August at www.eco-farm.org.

Zea Sonnabend is a longtime organic farmer and activist who was a primary organizer and ringmaster of the EcoFarm Conference between 1993 and 2008. She still serves on the EcoFarm planning committee.

Join Us at the 2019 Organic Grower Summit

You won't want to miss the third annual Organic Grower Summit, co-hosted by the Organic Produce Network (OPN) and CCOF in Monterey, California on December 4 and 5, 2019. This event is tailor-made for the organic community and brings together organic growers, producers, and processors for two days of education, information, and networking opportunities with their production supply chain and support service providers. Attendee registration will open in late July. CCOF members—use your client code when you register to receive a \$100 discount on your ticket! Learn more and register at www.organicgrowersummit.com.

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Certified Organic Kombucha: A Culture of Environmentalism

From Colorado to Virginia, organic kombucha producers are prioritizing sustainability in their supply chains. If you heard the word “kombucha” more than five years ago, you likely shopped at health food stores or lived in a co-op. Kombucha is a fermented, sweetened tea that is slightly alcoholic and slightly effervescent with a tangy, vinegary taste. The sugar in the tea is fermented using a “SCOBY,” or Symbiotic Culture of Bacteria and Yeast. Born of the health food movement, the now-mainstream kombucha industry is understandably dominated by organic options, a rarity among most commodities on the shelf. CCOF certifies kombucha producers around the country who are meeting the mark of organic, and who are demonstrating natural resource conservation through their sustainable business practices.

CCOF-certified Blue Ridge Bucha in Waynesboro, Virginia was founded in 2010 by Ethan and Kate Zuckerman, a husband and wife duo who started out by making kombucha for themselves, then for their friends, and eventually for their community. In nine short years, their entrepreneurial spirit took their kombucha from a Community Supported Kombucha (CSK) model (inspired by the Community Supported Agriculture [CSA] we all know and love) to availability in over 175 locations throughout the Mid-Atlantic. What sets Blue Ridge Bucha apart? Their unique business model prioritizes local distribution, with a

system to refill and recycle bottles. They were one of the first kombucha companies to put kombucha in a keg. They have saved almost one million bottles to date through their system of providing kombucha in draft form at local retail locations and restaurants and promoting the use of their refillable bottles.

Blue Ridge Bucha is choosing to stay regional because, in the words of Kate Zuckerman, they are “largely influenced by their desire to tread as lightly as possible on the earth.” They’ve been organic from the beginning—they believe in it and live it. Their appreciation for the quality of the “Organic” seal has increased through the process of being certified, knowing the rigor required to be compliant and the amount of time that goes into sourcing and recordkeeping.

Rowdy Mermaid in Boulder, Colorado, is another CCOF-certified kombucha producer that places a heavy emphasis on sustainability in their supply chain. In 2013, founder Jamba Dunn started out by making kombucha in his garage for his daughter, who wanted a less sweet, less vinegary kombucha. This has evolved into a prosperous business that recently received their Series A funding. Impressively, Rowdy Mermaid utilizes 100 percent wind source energy. They are implementing cans this summer and are one of the first kombucha producers to start down this path. Rowdy Mermaid has made the decision to implement can production into their supply chain for several reasons that are all founded in sustainability: cans are recyclable, product lasts longer in cans, and cans store more efficiently. Glass bottles, which are currently used by most kombucha producers around the country, are heavier than cans, so they contribute to greater emissions during shipping. Lastly, portable cans are easier to take hiking or for sipping at the University of Colorado stadium.

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Rowdy Mermaid sources their ingredients from small organic farms, and sourcing seasonally is a priority. Their products are inspired by the wild and the world around us, not the other way around. In their own words, "We also operate under a brewing philosophy based on the pure, sustainable, and seasonal ideal of new Nordic cuisine: brewing according to the natural seasonality of fresh ingredients, crafting scalable small batches, and supporting a seasonal tap program."

Both Blue Ridge Bucha and Rowdy Mermaid have tasting rooms for people to visit in their respective cities. If you are in the area, drop in for a glass of bubbly kombucha, and support these family-run, CCOF-certified environmental stewards. As the kombucha culture grows, so does the organic industry!

To learn more, visit www.blueridgebucha.com and www.rowdymermaid.com.

Full Harvests, Less Waste

Reducing food waste is a frequent dinner table discussion and complex topic that extends throughout the food chain. According to the National Resources Defense Council, up to 40 percent of available food in the United States is uneaten. Households and restaurants/food service are responsible for the most waste, followed by farms. In 2015, the USDA and the United States Environmental Protection Agency (EPA) announced the first ever domestic goal to cut food waste by 50 percent by 2030. CCOF member Full Harvest is using technology to help reach this goal, and is the first business-to-business marketplace for oddly shaped and surplus produce. Their platform has rescued over 10 million pounds of produce to date, 70 percent of which is certified organic.

Full Harvest's mission is "to empower sustainability at the root level with the marketplace for surplus and imperfect produce." In recent years less-than-perfect produce has gained attention, challenging the consumer and industry definition of acceptable aesthetics for fruits and vegetables. According to data-driven food waste nonprofit ReFed, integrating imperfect produce into the marketplace would have the potential to divert 266 thousand tons of food waste per year.

How does the Full Harvest platform work? Farmers have a profile where they list their available produce for potential buyers, and buyers can search for the fruits and vegetables that they need. When the farmer accepts an offer, the produce is transported directly from the farm to the buyer. This allows the produce to arrive as fresh as possible, without a stop at a distribution center. Full Harvest retains a percentage of each purchase, and the minimum transaction is one pallet. Many of the buyers are in the juice industry, where produce aesthetic is less important. In the future, Full Harvest aims to capture a broader market share. Full Harvest Founder and CEO Christine Moseley explains, "We aim to reinvent the food system so that all food and beverage companies utilize imperfect and surplus produce to the fullest extent possible."



When asked whether it is challenging for farmers to get started, Moseley says, "Once a grower is interested in selling with us, our dedicated sales team shows them how to create an account, add new inventory to their profile, and accept offers from potential buyers. Beyond the platform, our team also helps growers innovate on harvesting and/or packing practices to increase yields and decrease wasted resources. We have years of experience proving that the process of selling excess produce on Full Harvest can be simple and increase growers' profitability by up to 12 percent per acre."

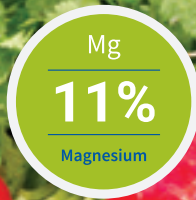
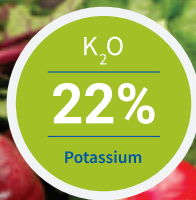
There are many benefits to decreasing food waste, including reducing greenhouse gas emissions, water usage, and energy usage, and making efficient use of acreage. However, the growing interest for produce that was once unwanted is controversial. For instance, a portion of oddly shaped or surplus produce considered unsellable is currently sent to food banks. Some worry that this contribution could be threatened. Moseley explained that of the 20 billion pounds of produce that go to waste each year, only a small portion ends up at food banks because of inefficient markets. "There is still huge opportunity to connect the oddly shaped and surplus produce supply to potential buyers. In addition, food waste is the number three contributor to climate change, so we all need to be doing everything we can as urgently as possible to solve this massive problem." Soon, Full Harvest will help support food banks by donating produce that doesn't sell in the marketplace.

Moseley's vision is "a world where there is zero percent food waste and 100 percent 'full harvests,' where all edible produce grown goes toward consumption." In October 2018, the EPA, United States Food and Drug Administration, and USDA reaffirmed their commitment to reducing food loss by publishing the *Winning on Reducing Food Waste Federal Interagency Strategy*. One of the priorities includes "collaboration with private industry to reduce food loss and waste across the supply chain." Partnering with Full Harvest, as well as other companies focused on food waste reduction, could help the United States reach the optimistic goal of 50 percent reduction by 2030.



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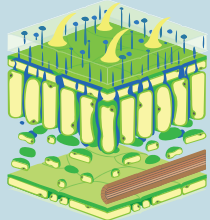
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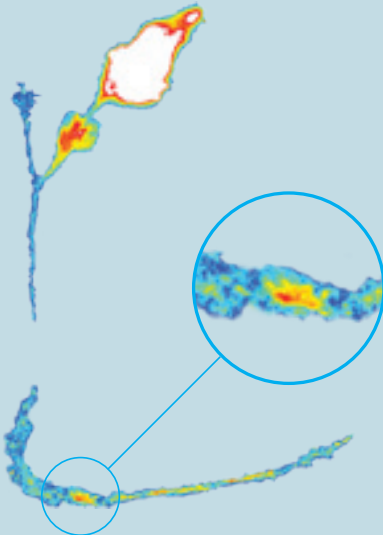
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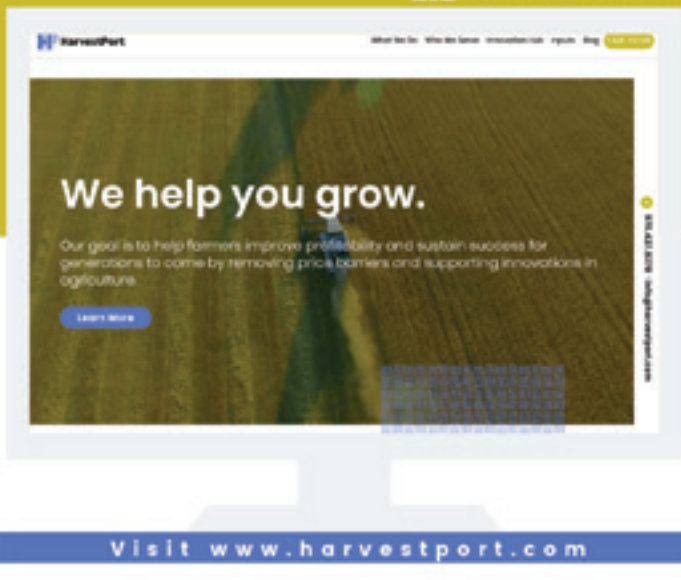


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Future Organic Farmer Grant Fund recipients Jesus Alcauter (left) and Shannon Good (right)

Future Organic Farmers: Investing in the Solution

In May, the United Nations released a study that concluded that “more plants and animals are threatened with extinction now than any other period in human history.”¹ The report, written by 150 authors from 50 countries, attributes the rapid decline in species to human activity, stating that the loss of species will erode “the foundations of our economies, livelihoods, food security, health, and quality of life worldwide.”

Agriculture is cited by the report as a primary way that humans interact with and impact the environment. As such, agriculture has the opportunity to be part of the solution. Organic farming, as documented in the CCOF Foundation’s recently released report *Roadmap to an Organic California: Benefits Report*, protects the environment through improved soil health and water quality, creates safe forage for pollinators, and mitigates climate change. It does so while simultaneously creating jobs, providing an organic price premium to producers, and supporting the next generation of American farmers seeking to establish viable businesses.

Reports like the UN’s are alarming, but they are also a call to support the next generation of organic farmers and ranchers. Since 2014, CCOF’s Future Organic Farmer Grant Fund (FOFGF) has supported 33,000 students across the United States in

their organic educations. It is clear that the next generation of organic professionals is making positive environmental change now, waiting for no one to grant them permission. While countries across the globe delay action by discussing which hole to patch first in the sinking ship of climate change, these young organic professionals have already launched their dinghies, and are steering us all to safety.

Reversing environmental damage and species loss will take time. However, future organic farmers are not daunted by the magnitude of the task. They have green thumbs and activist hearts. They are inspired to work in the field of organic. CCOF’s grant fund supports these developing minds as they sharpen their skills in order to enter the workforce prepared.

2018 CCOF Future Organic Farmer Jesus Alcauter, born to a farmer in Michoacán, Mexico, tends his organic land in central Texas. Alcauter used the grant funds to cover his tuition for Farmshare Austin’s Farmer Starter program, an 18-week intensive program designed to provide aspiring farmers with the tools necessary to start an organic farming business. The most unexpected part of organic farming for Alcauter? “The weather gets crazier every year.” Although changing weather patterns will be a force for Alcauter to contend with, his organic practices are helping mitigate climate change.

CCOF’s *Benefits Report* cites that “University of California scientists’ ... in-depth 2018 review of climate science recommends practices commonly implemented by organic farmers such as crop diversification and cover cropping because these practices mitigate climate change by creating healthy soils.” The report also explains that “The Rodale Farming

¹Fears, Darryl. “One Million Species Face Extinction, U.N. Report Says. And Humans Will Suffer as a Result.” *The Washington Post*, WP Company, 6 May 2019, www.washingtonpost.com/climate-environment/2019/05/06/one-million-species-face-extinction-un-panel-says-humans-will-suffer-result/



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Embarking upon a mission to create a world where organic is the norm is no small feat.

Systems Trial, which is the longest running organic comparison study in the United States, documented that after 22 years, soil organic carbon increased by 15-28% in organically managed soils compared to 9% in the conventionally managed soils.”

These same climate mitigation benefits extend to organic meat and dairy practices through “grazing practices that capture and hold carbon in the soil.”

The CCOF Foundation's FOFGF works to incentivize students from kindergarten through the end of college into careers in organic agriculture to help get more professionals like Alcauter in the field to help heal our planet. National FFA Organization student and two-time high school FOFGF recipient Shannon Good used the CCOF grant to start and manage her own dairy in Michigan. Raised on a conventional dairy farm, Good realized the economic and environmental benefits of transitioning her herd to certified organic practices. She now realizes the additional health benefits of organic dairy ranching and will be starting as a freshman this year at Michigan State University to learn more about organic ranching.

High school freshman and FOFGF grant recipient Wesley Drews understands the generational shift taking place in the agricultural marketplace. Conceptions of organic have changed, affecting consumer's food choices for the better. “People in their early 20s and 30s are trying to eat better and healthier,” Drews says. “Organic farming will be able to provide a living for farmers.” Drews will use his CCOF grant through the National FFA Organization to plant a two-acre garden of organic pumpkins and vegetables. He will sell his pumpkins, gourds, and vegetables at farmers' markets throughout 2019 and 2020. The CCOF Foundation grant excites Drews about his career potential as an organic farmer.

These students will be part of the vanguard that actively pursues a world where organic agriculture is part of a global solution to environmental degradation and climate change. The next generation is working to change their small part of the agricultural landscape, and in doing so, they are influencing others in their communities. Organic farmers benefit when an elementary school student asks her mom to purchase organic cereal, because she learned about glyphosate at school. Communities win when National FFA Organization students raise their dairy cattle organically and improve soil and water quality. The environment, local economies, and society win when students have access to education that enables them to create careers in organic agriculture.

Embarking upon a mission to create a world where organic is the norm is no small feat. Despite the apprehension we have when we learn of how people are negatively affecting the environment and future generations, it's critical to remember that the organic community is hard at work every day, laboring toward a positive future. The FOFGF is one way to support

the next generation of smart, capable producers to cultivate financial success for their families and ecological success of the planet. Learn more and support more future organic farmers at www.ccof.org/fofgf.

The CCOF Foundation's Organic Training Institute: 2019 Fall Events

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.

Making Farmers' Markets Work

This fall we will launch our new Making Farmers' Markets Work program. Geared toward organic farms that market through farmers' markets, this series of workshops and webinars will highlight ways to strengthen farmers' market sales through customer engagement, strategic crop selection, and value-added products that can set your stand apart. As part of this project we have also partnered with the California Alliance of Farmers' Markets to offer trainings for farmers' market managers on the USDA National Organic Program regulations as they apply to farmers' markets, as well as best practices for handling and labeling organic food in farmers' market settings.

Interested in having CCOF train your market manager? Contact the CCOF Foundation at ccofoundation@ccof.org.

Upcoming Educational Offerings

Keep a lookout for continued educational offerings later this year on food safety, organic recordkeeping, and on-farm natural resources conservation. And don't forget to attend the Organic Grower Summit in Monterey, California on December 4-5, 2019. Co-hosted by CCOF and the Organic Produce Network (OPN), the summit brings together organic growers, producers, and processors for two days of education, information, and networking opportunities with production supply chain and support service providers.

Learn more about upcoming Organic Training Institute events at www.ccof.org/events.

The Organic Training Institute's 2019 fall events are supported in part by funding from the following entities within the U.S. Department of Agriculture: the Agricultural Marketing Service Farmers' Market Promotion Program, the Risk Management Agency, and the National Institute of Food and Agriculture. Additional funding from the California Department of Food and Agriculture supports our on-farm natural resource conservation educational offerings.

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Maintaining a Strong Labor Force

WRITTEN BY Alessandra Bergamin

Around five years ago, Javier Zamora began to notice that the number of farmworkers on California's Central Coast was dwindling.

Zamora is the owner of JSM Organics, a 40-acre farm in Royal Oak, a mainly agricultural town between Santa Cruz and Monterey. Each season, he relies on a group of more than 20 workers, all of whom are Latino immigrants, to harvest everything from the strawberries to the cut flowers grown on his farm. While Zamora has managed to stabilize his own pool of workers, many California growers are feeling the pinch. Because guest worker programs cater to mostly large-scale farms, and because few city folk are interested in agricultural work, growers—in particular those operating smaller farms—are struggling to find and maintain a stable labor pool.

"We don't have enough people to work, to pick our berries, to pick our vegetables," Zamora says. "They're not here and they're not coming anymore."

Since California became a state in 1849, farmers have relied on migrant and seasonal workers to fill the agricultural labor void. From the Japanese workers of the early 1900s to the influx of Mexican migrants during the Bracero guest worker program of the 1940s, waves of immigrants have worked alongside growers to prune, pick, and pack the state's bounty. In this sense, not much in California has changed. In other ways, everything has: growers are increasingly struggling to retain a stable workforce without falling into financial collapse while farmworkers are some of the lowest paid workers in the country, often scrambling to find affordable housing as costs skyrocket. Both groups face a challenging situation yet ultimately are dependent upon one another. And therein lies the rub: without farmworkers, the fruit would rot on the trees and without the farmers themselves, there would be no fruit in the first place.

Given that the bulk of the agricultural labor force consists of immigrants from Mexico, most of whom are undocumented, immigration reform is inherently tied to the workforce. Yet it has been more than 30 years since any comprehensive immigration reform was introduced and passed, making current efforts ever more important. As organizations from the California Farm Bureau



Javier Zamora, JSM Organics



Vernon Peterson, Abundant Harvest Organics

to the United Farmworkers Union advocate for policy solutions in Washington, California's organic growers are adopting other individual methods aimed at securing their livelihoods and those of their workers.

High Wages, Fewer Workers

As Zamora aptly describes, one of the biggest problems facing growers has been a persistent shortage of workers. Earlier this year, the California Farm Bureau surveyed more than 1,000 farmers and found that 70 percent said they had trouble hiring employees in 2017 and 2018. The current agricultural labor force is an ageing one and given the current political climate, few workers are being replaced by new immigrants. The problem, however, isn't necessarily new. Aggressive deportations under previous consecutive administrations and an improving Mexican economy have led to more Latino workers leaving the U.S. rather than arriving. And even as farm labor wages rise, this kind of work rarely lures non-immigrant workers.

"There's no new people from the city coming to farm," Zamora says. "Only the workforce that comes from Mexico can handle this kind of work."

But under the Trump Administration a new problem has emerged. Increased immigration law enforcement and a general hostility toward immigrants have created a climate of fear among undocumented workers. Sara Neagu-Reed, the associate director in the Federal Policy Division at the California Farm Bureau Federation (CFBF), says she has heard of growers who are feeling the impact of a more anxious workforce. This is supported by grower comments in the 2019 CFBF survey. The study found that in addition to the struggle of recruiting and retaining a workforce, growers reported

that they were now contending with "an atmosphere where employees increasingly worry about the potential of being stopped as they travel to their jobs."

For growers able to find workers, retaining their workforce is the next challenge.

Since 1839, the Peterson family has been farming on 250 crop acres in Fresno County's Kingsburg. But even after six generations, it's rarely easy. Over the years, the farm—Abundant Harvest Organics, led by Vernon Peterson, a CCOF-certified member and a CCOF board member—has undergone constant changes to stay afloat. First was the switch to organic back in 2002. Then came the crop diversification, expanding from stone fruits to incorporate citrus and pomegranates. As Peterson explains, it gives the farm a constant steady supply of product and as a result, the need for a consistent supply of labor. The latter, Peterson explains, is dependent on the former. Without a strong economic system, it's impossible to pay workers competitive salaries or provide health care—some of the factors that can help guarantee year-round labor.

"You have to be the most efficient producer in your industry if you're going to be producing tomorrow," Peterson says.

Peterson employs around 50 full-time, year-round field workers. As he describes, this is when the magic starts to happen. Constant crops, and therefore, sales, have allowed Abundant Harvest Organics to provide each worker with health care, dental, vision and a matching 401k. Peterson says implementing a pay for performance system has also worked to simultaneously benefit his employees and the farm's bottom line. At Abundant Harvest Organics, workers are financially incentivized to avoid mistakes like breaking the skin on produce or picking the fruit before it is ripe. These two rules are, as Peterson explains, "objective, measurable, and published" standards on the farm and they translate to "don't pick it green and don't hurt it."



Farmworkers harvesting strawberries in California.

In May 2018, the median annual wage for agricultural workers was \$24,620. Of course, wages vary depending on who you work for and what work you're doing. But generally, farmworkers struggle to achieve a standard of living that the rest of us take for granted. One major problem for farmworkers, in part tied to low salaries, is the soaring cost of housing. On California's Central Coast, Zamora has watched as rent for a one-bedroom apartment has risen exponentially over the years, forcing multiple people, often multiple families, to share cramped quarters. A study from the California Institute for Rural Studies found that in the Salinas-Pajaro Valleys—a major center of organic crops—more than 30,000 new units of farmworker housing are needed to address critical overcrowding.

"Basically, they need to build another Salinas," says Dave Runsten, the policy director at Community Alliance with Family Farmers (CAFF). "The need is much greater than the supply."

Over the past few years, California growers have been struggling too, juggling the challenge of maintaining their bottom line with wage increases, labor shortages, drought, and regulatory pressures. The USDA estimates that farmers receive just 14.6 cents for every one dollar food purchase. Meanwhile, data from the USDA's most recent Census of Agriculture showed that between 2012 and 2017, California lost almost four farms a day. The challenge for growers speaks to Peterson's point that year-round farming, full-time employees, and incentivized worker efficiency are tantamount to trying to stay afloat.

"I don't think there's an employer anywhere that doesn't want to pay his employee a whole lot," Peterson says. "On the other hand, farmers are going broke. You can't pay what you don't have."

Even though his workforce and farm are stable right now, Peterson doesn't rest on his laurels. In early May, Abundant

Harvest Organics became a certified Fair Trade farm. It was just two years ago that Wholesum Harvest in Arizona became the first certified Fair Trade farm in the United States. Fair Trade means that in addition to meeting strict social and environmental standards, fair trade farms must pay workers an additional sum of money from every sale. At Abundant Harvest Organics that means an extra four cents for plums and five cents for peaches and nectarines. In addition to providing fair wages, health care, and matching 401k benefits, Peterson is working on hiring a nurse practitioner so that all workers can easily access medical care. While Fair Trade certification was perhaps a natural progression for Abundant Harvest Organics—given that many of the requirements were already in place—Peterson says it's too early to recommend the process to others. It is, however, another option for growers looking to maintain their bottom line and also pass on additional earnings to their workers.

"You've always got to be looking for new things, trying new things," Peterson says. "You know, try to stay in blue water and stay out of red water."

Policies And Problems

The H-2A guest worker program has long been one of the only options for growers looking to maintain a stable workforce, especially when workers are scarce. The program, which dates back to the early 1950s when the visa category was created, allows foreign workers to perform agricultural jobs for the length of their visa stay. The majority of applicants come from Mexico. While the program is uncapped, meaning as many workers can be brought in as needed, it isn't immune from criticism and more so, isn't particularly popular in California. The most recent California Farm Bureau survey found that just 6 percent of respondents said they had enrolled in the H-2A visa program. For smaller growers such as Zamora and Peterson, the bulky and bureaucratic program isn't an

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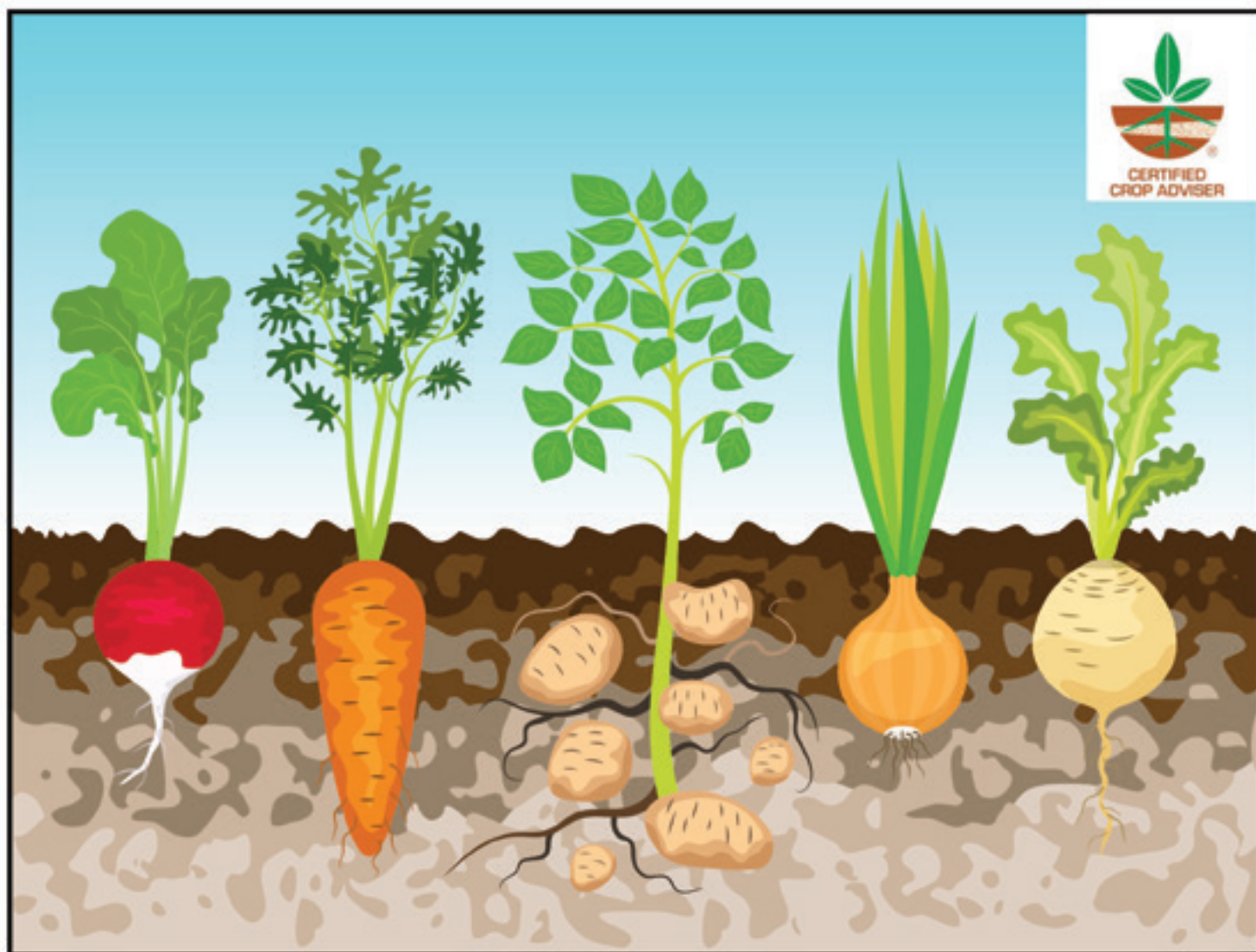
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Across the board, there's at least some agreement that given how infrequently immigration reform occurs in the United States, it's important to get it right for growers and for workers.

option. As part of the H-2A visa program, growers are required to provide both transportation and housing, but as Zamora explains, the lack of affordable housing on California's Central Coast makes that largely impossible. Workers are also tied to their employer, meaning that they can only work for one grower during their visa stay. For smaller farmers and those with seasonal crops this is both restrictive and ineffective at meeting their needs.

"When it comes to the current H-2A program, we hear the same question from smaller and medium-sized growers: 'Why go through such a burdensome program with all the paperwork and agencies involved to bring in individuals for a few weeks out of the year?'" Neagu-Reed says. "The program is costly and needs to be streamlined."

Farmworker advocates have also criticized the program. While workers through the H-2A visa program are paid more than minimum wage, their freedom of movement is restricted because they are tied to one employer for the duration of their stay. At its worst, this aspect of the guest worker program is akin to "indentured servitude," as Runsten from CAFF explains. H-2A visa workers are also vulnerable to wage theft and substandard housing and transportation given that their employer flexibility is restricted. Last year, the U.S. Department of Labor (DOL) won a court injunction against an H-2A employer in Missouri, citing not only wage violations but also unsanitary and unsafe housing. Investigations like this, however, are uncommon. As Runsten explains, the DOL has very few enforcement agents, meaning that there's little oversight and H-2A workers in a bad position are usually stuck there. What's more, the anti-trafficking organization Polaris found that among temporary work visa programs, the H-2A program accounted for the most reported cases of human trafficking.

"Some people have good experiences and they come back year after year," Runsten says. "Other people end up with some employer that is abusive or exploitative."

While poor working and living conditions are not necessarily the norm with the H-2A visa program, both grower and farmworker advocates agree that reform is imperative. Neagu-Reed says that CFBF would also like to see a new future flow program based on portability where growers can request workers for a certain period of time, usually the height of the growing season, then those workers can move to another

farm where there's a need. When an estimated 70 percent of California's agricultural workforce is undocumented, however, one of the more pressing policy issues is the need to legalize and, in turn, stabilize the state's current workforce.

Last Congress, a bill was introduced that would require mandatory e-Verify of all agricultural workers. In response to the proposal, a coalition of organizations including CCOF and the CFBF wrote a joint letter to Congressman Kevin McCarthy expressing concern that the bill was "not the solution necessary for California agriculture."

"If they are ever going to try to pass mandatory e-Verify as a standalone, we are not going to allow it to pass," Neagu-Reed says. "It needs to be packaged with ag immigration reform."

That reform could be the widely discussed "blue card program." Earlier this year, a group of five senators including California's Dianne Feinstein and Kamala Harris introduced legislation that would not only shield farmworkers from deportation but would also allow them to pursue a path to earned legal status and eventual citizenship. Under the legislation called the Agricultural Worker Program Act of 2019, farmworkers who have worked at least 100 days in the past two years may earn lawful "blue card" status. Following that, workers who maintain their blue card status by working in agriculture for the next three to five years—dependent on the total hours worked—would be eligible for permanent residency and in the future, citizenship. The concept of a blue card, a step before a green card, has largely bipartisan support from immigration groups, farmworker organizations, and growers' associations. The program would also extend to the families of workers who form part of the fabric of California's rural communities.

Across the board, there's at least some agreement that given how infrequently immigration reform occurs in the United States, it's important to get it right for growers and for workers. As Zamora suggests, there's a need for greater understanding from policymakers and the public especially when it comes to the challenges faced by those feeding the nation.

"Laws and offices, that's just a completely different world," Zamora says. "If [people] want to see reality, they need to come and check where their produce is coming from."

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CCOF Weighs in on California State Legislation

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This year California begins a new two-year legislative cycle with new legislators, new chairs of both the Senate and Assembly Agriculture Committees, and a new governor. Legislation introduced now will set the tone for the bills and work California's assemblymembers and senators will pursue during this cycle.

The CCOF Policy Team monitors California state legislation as it is introduced and makes its way through the legislature. CCOF tracks and monitors, supports, and opposes bills that are pertinent to CCOF and our members. CCOF also works with partners and coalitions on developing legislation to ensure that organic farmer, rancher, and processor perspectives are represented.

The California Organic-to-School Pilot Program

CCOF is proud to have supported Assemblymember Cecilia Aguiar-Curry's (D-Winters) bill, Assembly Bill (AB) 958, the California Organic-to-School Pilot Program. AB 958 would have provided grants for schools to purchase California grown organic food for school meals. School districts would have been provided 15 cents per school meal per student to purchase organic produce and products. The bill would have been an important step toward expanding access to and providing school children with nutritious organic food. AB 958 received broad support from organic farmers, agriculture organizations, school districts, and other stakeholders. Unfortunately, the bill did not progress through the Assembly Appropriations Committee.

Climate Change Adaptation Grants

Earlier this year, CCOF partner California Climate and Agriculture Network (CalCAN) and Assemblymember Monique Limon (D-Santa Barbara) introduced AB 409, the Agricultural Climate Adaptation Tools Program bill. AB 409 requires the director of state planning and research to establish and administer a competitive grant program to develop planning tools that help the agriculture sector adapt to climate change. The bill was formulated in response to listening sessions with farmers, ranchers, and technical assistance providers, many of whom have already felt the effects of extreme weather on their farms. CCOF supports the bill because it aligns with CCOF's legacy of expanding resources and technical assistance for farmers using organic practices. The bill unanimously passed the Assembly floor in May and was sent to the Senate.

Streamlining Industrial Hemp Laws in California

CCOF supports two bills streamlining industrial hemp laws in California. The first, AB 228, was introduced by Assemblymember Aguiar-Curry to declare any food or beverage product containing industrial hemp or derivatives as safe for human and animal consumption and to prohibit restrictions on the sale of items solely because they include industrial hemp or industrial hemp cannabidiols. CCOF supports AB 228 because as hemp becomes legal, some organic processors and handlers may want to include industrial hemp and/or industrial hemp-derived ingredients into their products.

CCOF also supports Senate Bill (SB) 153 authored by Senator Scott Wilk (R-Santa Clarita). SB 153 would require CDFA to develop and submit a state plan to USDA on the cultivation of industrial hemp. California producers are at a competitive disadvantage with other domestic industrial hemp cultivators because the state does not have an agricultural pilot program or a state plan. A state plan would conform CDFA's industrial hemp program to the provisions in the 2018 Farm Bill and streamline California's industrial hemp regulations.

Neither AB 228 nor SB 153 received oppositional votes through their respective houses of origin. The bills will now move through the Assembly or Senate before being sent to the governor's desk for signature into law.

The Agriculture and Rural Prosperity Act

Assemblymembers Joaquin Arambula (D-Fresno), Robert Rivas (D-Hollister), and Devon Mathis (R-Porterville) are joint authors of AB 417, the Agriculture and Rural Prosperity Act. AB 417 empowers the Secretary of Food and Agriculture to establish a position within its executive office to undertake various activities that support the further development of rural agricultural economies in California.

CCOF signed on as a supporter of the bill if it is amended to include an organic multiplier under its projects. Multipliers are tools to provide data and estimates on the importance of agriculture to our state. Organic agriculture can help further the development of California's rural agricultural economies. Further data provided through organic multipliers will help support the growing organic marketplace and California's rural communities.

Assistance to Small- and Moderate-Scale Diversified Farms and Ranches

CCOF joined a coalition of agriculture organizations in support of Assemblymember Susan Eggman's (D-Castro Valley) AB 838. The bill expands beyond the 2017's Farmer Equity Act by creating the Farmer Equity and Innovation Center within the University of California's (UC) Small Farm Program. AB 838 would increase the number of UC Small Farm Advisors

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to six and would require UC to create the first statewide program to support small- and moderate-scale farmers and ranchers by July 1, 2021. The bill would enhance UC Cooperative Extension's support for small-scale, limited resource, socially disadvantaged, and beginning organic farmers. AB 838 stalled in the Assembly Appropriations Committee.

Bills CCOF is Monitoring

In addition to the bills CCOF supports, CCOF policy staff are also tracking bills for their potential impact on organic agriculture and CCOF members. CCOF is monitoring Assemblymember Rivas' AB 937, a bill that would require an additional review of produced water before it is approved for agricultural purposes or for groundwater recharge. The bill was pulled from the Assembly Environmental Safety and Toxic Materials Committee and had its hearings canceled at the request of the author.

CCOF is also monitoring Assemblymember Rivas' AB 986, the Regional Economies and Equity in Agricultural Land (REEAL) Program. The REEAL Program would provide grants and loans to support socially disadvantaged farmers and ranchers in accessing farmland and rangeland. The bill also establishes a program to create agricultural easements to preserve farmland in California. The bill did not clear the Assembly Appropriations Committee.

For more information about the bills, CCOF's positions, and how to express support or opposition to legislation, contact Peter Nell at pnell@ccof.org.

California Organic Products Advisory Committee Establishes Subcommittees

On May 7, 2019, the California Organic Products Advisory Committee (COPAC) met in Sacramento. COPAC advises the California Secretary of Food and Agriculture on organic issues in the state. At the meeting, CDFA staff provided updates on current and upcoming vacancies on COPAC, CDFA and the California Department of Public Health (CDPH) gave updates on their organic programs, and COPAC members reported back on subcommittee meetings.

Program Vacancies

COPAC hopes to fill various committee vacancies in the coming months. There are primary seats open for a processor, a technical representative, and a consumer, in addition to eight available alternate spots. CCOF maintains a strong member presence on the committee, with eight members currently serving either as primary or alternate members. CCOF members Karen Archipley

of Archi's Acres and Jeremy Johnson of Traditional Medicinals serve as committee chair and vice chair respectively.

If you are interested in filling one of the vacancies on COPAC, please contact policy@ccof.org.

Glyphosate Subcommittee

COPAC received an update from its Glyphosate Subcommittee, which has been exploring what action, if any, COPAC should take regarding potential drift contamination from the controversial herbicide. The subcommittee decided to pursue more education about the issue and requested the presence of the Department of Pesticide Regulation and staff from the CDFA testing lab at their next meeting.

Processor Subcommittee

The Processor Subcommittee met directly after the COPAC meeting and plans to meet again after the next meeting. The subcommittee discussed the new organic processor investigator position announced by CDPH. The new investigator will be hired as a certified peace officer, which will require them to carry a firearm. Subcommittee members stressed the importance of hiring an investigator with experience and training relevant to organic processing.

CalCannabis Subcommittee

COPAC also established a subcommittee to work with CDFA's CalCannabis branch and its development of OCal, an organic cannabis certification program. CalCannabis is mandated to begin certification of cannabis under the program by January 1, 2021. In a meeting on May 15, CalCannabis sought input from subcommittee members on the creation of the accreditation program for organic cannabis certifiers. Subcommittee members Karen Archipley and Phil LaRocca, both CCOF board members, stressed that CDFA should model their accreditation program after the National Organic Program to ensure the integrity of organic cannabis certification.

Up Next?

The committee also scheduled its next meeting, which will be held at the Sonoma Farm Bureau office on September 26, 2019.

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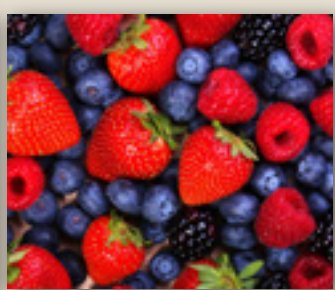
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Let Your Voice be Heard!

.....

A garden does well with regular attention and dedication. That is also the case with the CCOF chapter system. We have seen time and again that chapters who have active leadership benefit their members and the community the most. CCOF encourages members to run for chapter leadership or support current chapter leaders by communicating with them, attending chapter meetings, and participating in chapter elections.

In-person gatherings help build rapport and open the door to collaborations that strengthen members' businesses and advance organic. Representing different types of businesses, varying locations of meetings, identifying relevant topics to discuss, and finding sources of inspiration contribute to broader inclusivity and input from a wider base of stakeholders.

Chapter meetings also allow the CCOF policy team to identify and connect with members who want to be involved in political advocacy. The CCOF policy team works on behalf of our members in various ways, including connecting with government representatives; supporting and helping write bills that strengthen organic; finding where and how to streamline regulations; supporting and informing the California Organic Products Advisory Committee, National Organic Standards Board, and Regional Water Board; and collaborating with strategic partners.

CCOF's chapter system provides a unique platform for representation and participation in a democratically governed member-driven organization propelling organic forward. The organic sector is a complex, constantly evolving garden that needs unwavering tending. Participation in the chapter system offers an important opportunity to shape its future.

Processor/Handler Chapter

The current Processor/Handler Chapter leadership is Board Representative Renee Thresher, President Jeremy Johnson, and Treasurer Rusty Brown. This chapter is comprised of processor and handler operations across the United States.

The Processor/Handler Chapter held a meeting at the end of this year's CCOF Annual Meeting and Conference on February 27 in Fresno, California. A call for chapter officer nominations was announced and chapter Board Representative Renee Thresher gave a brief board update. Chapter President Jeremy Johnson, who is also California Organic Products Advisory Committee's vice chair, gave an update on the committee's work on issues including state cannabis regulations, residue testing, and streamlining organic regulations. Summer Ashley Singletary gave a presentation on "marketing that matters," focusing on how to develop simple and effective digital marketing strategies

that drive brand awareness, communicate a point of difference, and support the growth of organic businesses.

Sierra Gold Chapter

The current Sierra Gold leadership is Board Representative Rich Ferreira, President Randy Hansen, Vice President Mike Pasner, Treasurer Michal Lawrence, and Secretary Craig Thomas. This chapter encompasses Alpine, Amador, Calaveras, El Dorado, Nevada, Placer, and Tuolumne counties.

The Sierra Gold Chapter held a meeting on March 10 in Placerville, California. Martin Guereña from the National Center for Appropriate Technology (NCAT) presented on a range of programs that can benefit organic farmers, including California Department of Food and Agriculture's Healthy Soils Incentive Program (HSP), and the Natural Resources Conservation Service's Environmental Quality Incentives Program (EQUIP) and Conservation Stewardship Program (CSP).

Chapter leaders Thomas and Hansen, along with other CCOF members and CCOF Senior Policy Specialist Jane Sooby, met with the Central Valley Regional Water Quality Control Board to discuss possibilities for streamlining compliance for organic farmers. The chapter also increased its allocation for advertising local organic CCOF farmers through local media.

San Luis Obispo Chapter

The current San Luis Obispo Chapter leadership is Board Representative and President Jutta Thoerner, and Vice President Ron Labastida. This chapter encompasses San Luis Obispo County.

The San Luis Obispo Chapter organized a tour of the Kompogas Bio-Digester facility in San Luis Obispo on April 10. The San Luis Obispo Kompogas facility converts municipal solid organic waste into high-grade compost, liquid soil amendment, and carbon neutral biogas! Through a controlled 14-day multistage process at a thermophilic temperature of 131 degrees, food waste is converted into compost for agricultural use and carbon-neutral biogas for electricity production. The facility does all this indoors without producing runoff and while recovering energy in the process. At full capacity the plant is designed to generate 6.2 million kilowatt hours annually, which is more than enough to power the facility and send excess electricity into the grid.

The chapter is seeking motivated members to support Board Representative Jutta Thoerner in chapter leadership positions. Thoerner has been a dedicated leader for three years and is eager to continue working hard representing her chapter on the CCOF Board of Directors, but needs CCOF members to step into other positions to help with chapter events. All positions are up for election. If you are interested in being a chapter leader, please reach out to CCOF Member and Public Outreach Specialist Adrian Fischer at afischer@ccof.org or (831) 346-6282.

We look forward to hearing from you and seeing you at upcoming chapter events!

LET ORGANIC



More than 200 leaders from organic businesses, farms, and ranches of all sizes from all regions of the country came to Washington in May with one goal in mind: Repair the organic public-private partnership and halt the bureaucratic foot-dragging that is stymying this vibrant industry.

In an era of record low trust in government and corporations, the organic industry is, refreshingly, on the side of consumers and farmers, and working in a transparent way to lobby for good. We want the public to know what we were in the Nation's Capital to do—that is, get government to move much more quickly to strengthen organic standards, and allow organic to work in bigger and better ways. We even invited top social influencers to join us and pull back the curtain on our advocacy on Capitol Hill.

Organic has nothing to hide.

America's organic sector is one of the bright spots in the challenged U.S. farm economy. U.S. organic sales have grown from \$1 billion in 1990, when the Organic Foods Production Act was signed into law authorizing the U.S. Department of Agriculture's National Organic Program, to \$8.6 billion in 2002 when the USDA Organic seal was introduced. Today we have over 27,000 certified organic operations nationwide serving a \$52-plus billion market, whose annual growth rate regularly outpaces that of the total food market.

At first glance, the facts show that the combination of organic initiative and a substantive government program to monitor and guide the sector has worked well. The public-private partnership of the USDA Organic label has for almost 20 years been the gold standard for a regulatory system that participants voluntarily opt into and for which the government creates uniform and robust standards and supports the industry's priorities.

But look again. The organic sector has come together 20 times in the past 10 years to agree to consensus-based recommendations to strengthen the organic standards. BUT not a single one of these recommendations has made it through the bureaucratic maze to become a final upgraded requirement. This is not a new problem; it is a decades-long problem.

That is why we are asking Congress to step in and to innovate how government works with meaningful voluntary regulations.

The Organic Trade Association is working with Republicans and Democrats to craft legislation to ensure continuous improvement and accountability in organic standards. The voluntary, opt-in organic program is unique, and organic standards and regulations should be allowed to move forward in a way that is different than mandatory regulations.

BE ORGANIC

We want continuous improvement in organic standards to be defined in the law and regulations in order to maintain the value and the trust of the Organic seal in the marketplace, and to allow organic to continue fostering soil health, biodiversity, animal welfare and natural resource conservation.

Millions of American consumers buy organic every day for their families because they know it makes a difference. The USDA Organic seal means the product has been grown and processed without any toxic and synthetic pesticides or fertilizers, without any GMO ingredients, without any antibiotics or synthetic growth hormones, without any artificial flavors, colors or preservatives.

It is often overlooked that organic provides a test lab for the best sustainable practices in agriculture. These practices over time become more broadly adopted, such as the practice of planting cover crops which help repair soil, reduce weeds, hold moisture, or growing crops without chlorpyrifos, or raising livestock without the use of antibiotics, and a host of other beneficial practices. Let's not hold this back—let's embrace this opportunity. We encourage our colleagues in the rest of agriculture to NOT be afraid of strict organic standards.

We need government to not hold back progress. Organic is a transparent, positive, solutions-oriented force. The government needs to get moving regarding its obligations to organic, and help advance the sector so that farmers, consumers, and working landscapes can benefit.

It can be hard to get into organic, and it should be. Whether you are in it for organic's value-added premiums, to help the environment, or to lighten the chemical load in food production, organic depends on its clear difference. Let's let organic plow ahead and break new ground. What have we got to lose? Plenty.



Laura Batcha has been CEO and Executive Director of the Organic Trade Association since January 2014. She has been involved in organic in a number of roles—from raising organic crops, selling at farmers' markets and through Community Supported Agriculture (CSA) programs, having her own organic business and working for a multinational organization.

The Organic Trade Association is the leading membership-based business association for organic agriculture and products in North America. It represents over 9,500 organic businesses across 50 states, including growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others.



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Cross-Check Audits to Detect and Deter Fraud

To ensure continued consumer trust in the integrity of the organic label, CCOF constantly looks for ways to address fraud. One method we began in 2018 is cross-check auditing of CCOF-certified operations. A cross-check is a review of audit trail records across multiple producers or handlers to compare what was *reported* as grown and sold as organic to what was *purchased, received, or processed* as organic by another operation. Cross-checks are similar to in/out mass balance. However, the broader supply chain visibility of a cross-check creates the potential for catching discrepancies or fraud that could otherwise hide.

In 2018 we conducted a cross-check pilot program focused on industries with increased risk of fraud. We looked at CCOF certified supply chains and identified CCOF-certified handlers and CCOF-certified growers that the handler identified as suppliers. During 2018 annual inspections for each operation, we collected records for prior crop years. When all inspections were complete, we compared records across companies to look for discrepancies in reported grower sales and reported handler purchases. While we continue to analyze our results, we currently have no evidence of fraud.

In 2019 we have begun using cross-checks for investigation of potential fraud and expanded our investigations to include supply chains where both operations are CCOF-certified as well as supply chains where only one operation is CCOF-certified. When CCOF does not certify both operations, we will work with other certifiers to ensure a successful cross-check can be conducted. All CCOF-certified operations should be prepared to provide documentation of purchases and sales during annual inspections.

Cross-checks help CCOF gain a better understanding of supply chains and are an additional tool we can use in investigation of allegations of fraud. We believe organic fraud is rare and efforts like these will continue to keep it so.

Food Safety: Industry Update

With the production season getting into full swing, it's important for organic producers to keep an eye on the food safety ball to ensure all your hard work doesn't get stopped at

home plate by a buyer unwilling to accept your product. Food and Drug Administration commodity-specific and industry-developed guidances are one way to help ensure your food safety plan is relevant to the crops you produce. As always, CCOF's food safety staff and GLOBALG.A.P. certification program are here to assist producers with food safety.

Updated LGMA Metrics

The California Leafy Greens Marketing Agreement (LGMA) recently voted to strengthen food safety practices on farms producing leafy greens. One notable change is the requirement to treat surface waters for bacteria. Treatments available to organic producers can include chlorine and peracetic acid. Be sure to add these treatments to your OSP Materials List and get approval prior to applying them. As a reminder, residual chlorine levels in irrigation water must be at or below four parts per million when applied to organic crops or soil. Visit www.lgma.ca.gov for more details.

Tomato Metrics (TGAP) by United Fresh Produce Association

United Fresh is seeking public comment on the 2019 revision of their Tomato Protocols. Currently the 2011 guidance documents are a resource for fresh tomato growers. The guidelines break down by production method: greenhouse, open field production and packing, packinghouse protocols, and repacking and distribution. If you grow or pack fresh tomatoes, visit www.unitedfresh.org and search for "Tomato Protocols."

FDA Draft Guidance for Produce—Small Entity Compliance Guide

While only in draft form, this guidance can assist small producers with Food Safety Modernization Act Produce Safety Rule compliance. Visit www.fda.gov and search for "Produce Guidance."

Other FDA Guidance Documents Address the Following Crops:

- Sprouts
- Cantaloupes and netted melons
- Fresh culinary herbs
- Green onions
- Fresh cut produce
- Wine grapes, pulse crops, and almonds
- Potatoes
- Pistachios and peanuts



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