

Controversy Over Liquid Fertilizers

INSIDE THIS ISSUE:

Liquid Fertilizers	1
WSDA Material Registration Program Receives ISO Guide 65 Accreditation	2
IOAS Accreditation; Cost Share; Farm Bill, NRCS & EQIP	2
USDA seeks NOSB Nominations; OFP Growth	4
International Guidelines for Manure	5
Brand Name Material List Update	6-9
Natural Beef Certification	9
Detecting Fertilizer Fraud	10
Arrivals & Departures	10
Canadian Organic News	11
Organic Greenhouse Guidelines	11-12
Treated Wood Guidelines	13-14
January Producer Survey	14-15

There have been recent allegations of fraudulent activities in the fertilizer industry specifically regarding allegations of the fortification of liquid fertilizers with synthetic nitrogen. Sources of nitrogen on an organic farm must be from nonsynthetic materials, such as feather meal, blood meal, manure and fish products. While synthetic sources of nitrogen such as urea and ammonia are less expensive than nonsynthetic sources, and can deliver more nitrogen per pound of fertilizer, they do not meet the organic standards and are prohibited for use in organic crop production.

In 2006, the California Department of Food and Agriculture investigated an approved organic fertilizer, Biolizer XN, manufactured by California Liquid Fertilizers. This product had been approved for use by the Organic Material Review Institute (OMRI) in organic crop production. The CDFA investigation determined that Biolizer XN was fortified with ammonia sulfate, a synthetic prohibited source of nitrogen.

This February, WSDA learned that Port Organic Products was under investigation and information alleges that they were storing undisclosed ammonium hydroxide on their operation without authorization from the county or state. Ammonium hydroxide is a synthetic source of nitrogen that is prohibited for use in organic crop production. Port Organic Products had five products registered on the WSDA Brand Name Material List (BNML): Fishilizer, Fishilizer Plus K, Marizyme Birdilizer, Marizyme and Marizyme Plus K. These products were withdrawn from the BNML on February 18, 2009 and are no longer allowed for use in organic crop production.

The National Organic Program Responds

On February 20 and March 4, 2009, the USDA National Organic Program (NOP) responded to the Port Organic Products allegations by issuing policy statements indicating that the use of Marizyme and Agrolizer (a product manufactured by Port Organic Products but distributed by Agromar, Inc.) may put certified organic operations at risk. In addition, the NOP called for increased scrutiny of liquid fertilizer inputs claiming over 3% nitrogen by requiring the following actions:

- By October 1, 2009, approval of all high nitrogen liquid fertilizers (nitrogen analysis greater than 3 percent) must be accompanied by documentation that demonstrates their compliance with the NOP regulations, based upon a 3rd party inspection that meets the criteria below. If such documentation is not

WSDA Material Registration Program receives ISO Guide 65 Accreditation

The WSDA Material Registration Program evaluates materials for compliance with US National Organic Standards and for compliance with Japanese, Canadian and European organic standards. In January 2009, the program received ISO Guide 65 accreditation from the International Organic Accreditation Service (IOAS). Accreditation to ISO Guide 65 demonstrates that the WSDA organic material registration program has a quality system that meets international standards for evaluating organic input materials. ISO is the International Organization for Standardization, a worldwide federation of national standards bodies. ISO's mission is to promote the development of standardization and related activities in the world with a view to facilitating the international exchange of goods and services, and to develop cooperation in the spheres of intellectual, scientific, technological and economic activity.

International Organic Accreditation Service (IOAS) Accreditation

The WSDA Organic Food Program is audited by the International Organic Accreditation Service (IOAS) for compliance with ISO Guide 65 and the International Federation of Organic Agriculture Movements (IFOAM) Accreditation Criteria. In January 2009 WSDA received IFOAM accreditation for the International Organic Program. The IFOAM accredited International Organic Program includes certification to both the Canadian Organic Regime and European organic standards.

Organic Certification Cost Share Program

On March 10, 2009 WSDA received the 2008 National Organic Certification Cost Share Agreement from USDA. Reimbursements for the 2008 and 2009 organic cost share program will be processed throughout the spring and summer. The cost share program reimburses certified organic operations for 75% of the organic certification costs up to a maximum reimbursement of \$750. Operations that are certified in 2008 and 2009 will be eligible for the \$750 reimbursement for each certification year.

Farm Bill – NRCS – EQIP

The 2008 Farm Bill has directed the USDA Natural Resources Conservation Service (NRCS) to assist organic producers. Funding is available through the Environmental Quality Incentives Program (EQIP) to assist producers with the cost of transitioning to organic production or for making improvements on existing organic farms. The new organic conversion program supports organic conversion up to \$20,000 per year for the cost of conversion. Costs may include decreased yields during transition, increased expenses due to more labor or other expenses. Funds may also be available for improved practices on existing organic farms – e.g. recordkeeping expenses, use of compost, decreased tillage. Contact your local NRCS office for more information.

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Mission Statement

The WSDA Organic Food Program protects consumers and supports the organic food industry by ensuring the integrity of organic food products. The program certifies organic producers and handlers to US National Organic Standards and enforces organic standards in Washington State. The program supports the development of export markets by providing certification to international organic standards.

Controversy Over Liquid Fertilizers cont'd from p. 1

provided, Accredited Certification Agencies must immediately rescind approval for the use of these materials by certified organic operations.

- By October 1, 2009, NOP will require all 3rd party reviewers (OMRI, WSDA) to implement a system of audit and inspection for branded products they deem compliant with the NOP regulations. Inspections must include but not be limited to high risk inputs such as liquid fertilizers and other inputs where synthetic substitutes are readily available and have the potential to be concealed.
- NOP will also require all 3rd party reviewers (OMRI, WSDA) to undergo audits by NOP as a condition of ongoing recognition as a 3rd party reviewer for materials by the NOP.
- NOP will focus increased scrutiny on how inputs are approved for use by certified organic operations during accreditation audits of accredited certifying agents beginning with an emphasis on liquid nitrogen fertilizers.

How does this affect the Organic Food Program and the WSDA Brand Name Material List?

As a third party reviewer, the WSDA Organic Food Program is developing an inspection program to conduct inspections of manufacturers that have products listed on the Brand Name Material List. This inspection program will begin with all liquid fertilizers that have a nitrogen claim above 3% and will expand to include any materials determined to be “high risk.” We will evaluate the following criteria required by the NOP at each operation:

- No evidence of fraud in formulation, including verifying the presence of all necessary infrastructure to produce the approved finished product. This includes: dry and liquid storage, all necessary conveyance (forklifts, trucks, piping, etc), finished product storage, and both the ingredient and finished product transportation infrastructure.
- Verification of no synthetic nitrogen equipment, tanks, or supplies within 100 yards of the facility that produces the organic approved inputs at any time of the year; and
- Verification that a successful audit was conducted comparing incoming materials with outgoing finished products and complete, detailed explanations for any deviations.

How this affects you

As a WSDA certified organic producer, you must first be sure that you are meeting the criteria for soil condition and soil fertility management under NOS 205.203. This includes the following requirements:

- The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion.
- The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.
- The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances.

You can read the full text of the NOP policy statement on liquid nitrogen fertilizers on the WSDA Organic Food Program website. As always, if you have any questions pertaining to materials that are used on your operation, please do not hesitate to contact your certification reviewer directly or call our receptionist at (360) 902-1805 to be directed to your reviewer. *See related article “Detecting Fertilizer Fraud” on p. 10*

USDA Seeks Nominations for National Organic Standards Board

The U.S. Department of Agriculture is seeking nominations to fill five upcoming vacancies on the National Organic Standards Board (NOSB). The Secretary of Agriculture will appoint five persons to serve a 5-year term of office that commences upon appointment. The NOSB is a 15-member board that is responsible for developing and recommending to the Secretary a proposed National List of Allowed and Prohibited Substances and advising the Secretary on other aspects of the National Organic Program.

Nominations are being sought to fill these five upcoming vacancies: organic producer (2 positions), retailer (1 position), organic handler (1 position), and an environmentalist (1 position). Individuals seeking appointment to the NOSB must be an owner or operator of an organic production operation, an organic handling operation, or a retail establishment with significant trade in organic products or must have expertise in areas of environmental protection and resource conservation that relate to organic agricultural production. USDA will follow equal opportunity practices in all appointments to the NOSB.

Written nomination, with cover letters and resumes, must be postmarked on or before July 17, 2009. Nominations should be sent to Katherine E. Benham, National Organic Program, USDA-AMS-TM-NOP, 1400 Independence Avenue, SW., Room 4004-S, Ag Stop 0268, Washington, D.C. 20250. For more information, contact Katherine Benham at (202) 205-7806; e-mail: Katherine.benham@usda.gov; or fax: (202) 205-7808.

The numbers

The Organic Food Program has experienced strong steady growth over the last 5 years. In 2008 the program continued to grow. In 2008 there were 1188 certified operations including 796 organic producers on 96,139 acres. Total organic sales were \$654 million in 2007 and we estimate that Washington organic sales will top \$1 billion by 2010.



International Guidelines for Manure

International organic standards contain additional requirements regarding the use of manure in organic operations. These requirements are more restrictive than the National Organic Standards. Under Canadian and European organic standards, manure and compost from factory farms is prohibited; however, factory farms are not clearly defined. This ambiguity creates a challenge for certifiers evaluating products under European and Canadian organic standards. European and Canadian organic certifying agents have stated that factory farm manure is prohibited because of concerns with heavy metals, pesticides, and other contaminants that may be found in non-organic manure and compost.

To address these concerns, WSDA developed guidelines for evaluating manure and composts for equivalency to the European, Canadian, and Japanese organic standards. Manure from non-organic operations will need to be tested annually to verify that these materials do not pose a contamination risk to certified producers. The following additional requirements apply to manure used under the International Organic Program for the EU and Canada:

- No raw manure from caged poultry operations. Composted or heat processed caged poultry manure is permitted if it meets standards for residue testing indicated below.
- Raw, composted, and processed manure from non-organic operations must be tested annually for residues of heavy metals and pesticides.

- The metal analysis must demonstrate that the product complies with the following limits, detailed in the table to the right:

Metal	Limit (mg/kg dry weight)
Arsenic	< = 20 ppm
Cadmium	< = 10 ppm
Copper	< = 750 ppm
Lead	< = 150 ppm
Mercury	< = 8 ppm
Molybdenum	< = 9 ppm
Nickel	< = 210 ppm
Selenium	< = 18 ppm
Zinc	< = 1400 ppm

- Commercial fertilizers which contain manure-based ingredients may substitute the metal analysis required for their WSDA commercial fertilizer registration.
- Testing for pesticide residues must include a broad range of organophosphates and organochlorines. Acceptable test methods include EPA 8010 or 8081A for organophosphates and EPA 8141, 8141A, or 8141B for organochlorines. Any detected pesticide residues must be below the FDA Action Level or below 5% of the EPA tolerance level.
- Composted and processed manure from non-organic operations must be tested annually for pathogens. Materials may not contain more than 1×10^3 (1,000) MPN (Most Probable Number) fecal coliform per gram and not contain more than 3 MPN Salmonella per 4 gram sample.

Records must be available to verify that raw, processed, and composted manure products meet the requirements noted above for materials used under the International Organic Program for the EU and Canada.

BRAND NAME MATERIAL LIST UPDATE

April 1, 2009

This list is to be used as an addendum to the Brand Name Material List. All materials listed below are approved as of April 1, 2009. You may access a complete updated Brand Name Materials List at the WSDA Organic Food Program website: <http://agr.wa.gov/foodanimal/organic/default.htm>.

Product Name	Company	Sub-Type	Type	Annotations	Int'l Stds*
2-4-0.2 Eco-Hydro	Eco-Nutrients, Inc.	Fish Product	F & SA	None	
Accu-Tab SI	PPG Industries, Inc.	Chlorine Material	P & H	Residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act [205.601(a)(2)]	
Alaska Salmon Fish Fertilizer	Alaska Protein Recovery, LLC	Fish Product	F & SA	None	
B-17 Boric Acid Spray	Nutrient Technologies, Inc.	Boron	F & SA	Soil deficiency must be docu-	
Benefox	Agroganic Products LLC	Microbial Product	F & SA	None	
Blu-Min 10% Lignin Zinc	Kronos Micronutrients, LP	Zinc Sulfate	F & SA	Soil deficiency must be documented by testing	
Blu-Min 35.5% Zinc Granular with Sulfur	Kronos Micronutrients, LP	Zinc Sulfate	F & SA	Soil deficiency must be documented by testing	
Blu-Min Liquid Zinc Sulfate	Kronos Micronutrients, LP	Zinc Sulfate	F & SA	Soil deficiency must be documented by testing	
CHB Activate	Bio-Gro, Inc.	Fish Product	F & SA	None	
DAZITOL	Champon Millenium	Insecticide	D & PC	Label Use Only	
DuoGard	USAgr iTech, Inc.	Fungicide	D & PC	Label Use Only	
EF300	USAgr iTech, Inc.	Insecticide	D & PC	Label Use Only	
EF400	USAgr iTech, Inc.	Fungicide	D & PC	Label Use Only	
Enhanced 4-4-4F	Perfect Blend LLC	Blended Fertilizer	F & SA	Soil deficiency must be docu-	
Fish Fertilizer - Clear	Clear Springs Foods, Inc.	Fish Product	F & SA	None	
Foundation 21	Source to Source	Liquid Fertilizer	F & SA	None	
Goemar MZ 'O'	Agrimar Corporation	Blended Fertilizer	F & SA	Soil deficiency must be docu-	
GWS Simply Topsoil	Great Western Supply	Topsoil	F & SA	None	
GWS/SSO Simply Organic Mix	Great Western Supply	Soil Amendment	F & SA	None	
HumaCal	Midwestern Bio-Ag Prod-	Humic Acid	F & SA	None	
Humasol 6%	Agricare, Inc.	Humic Acid	F & SA	None	
KeyPlex 350 OR	Morse Enterprises Ltd. Inc.	Fungicide	D & PC	Label Use Only	
Kumulus DF	Micro Flo Company LLC	Sulfur Product	D & PC	Label Use Only	

BNML cont'd from page 6

Product Name	Company	Sub-Type	Type	Annotations	Int'l
Lithovit	U.S.A. Lithovit, LLC	Limestone	F & SA	None	
MiteGard	USAgritech, Inc.	Miticide	D & PC	Label Use Only	
Nature Safe 10-2-8	Griffin Industries, Inc.	Blended Fertilizer	F & SA	None	
Nature's Balance Organic Fish Bone Fertil-	OxyWave Environmental Services Inc.	Fish Product	F & SA	None	
Nature's Balance Organic Liquid Fish Fertilizer Formula 231	OxyWave Environmental Services Inc.	Fish Product	F & SA	None	
Nature's Balance Organic Liquid Fish Fertilizer Formula 231 Plus	OxyWave Environmental Services Inc.	Fish Product	F & SA	None	
Nutri-Cal	California Organic Fertilizers, Inc.	Calcium Chloride	F & SA	Only for use as a foliar spray to treat physiological disorders associated with calcium uptake [205.602(c)]	
Nutri-Ger Lo-pH	California Organic Fertilizers, Inc.	Acetic Acid	CPA	None	
Nutri-Set QC	California Organic Fertilizers, Inc.	Calcium Chloride	F & SA	Only for use as a foliar spray to treat physiological disorders associated with calcium uptake [205.602(c)]; Soil deficiency must be documented	
Organic Activator	CH ₂ O, Inc.	Chlorine Dioxide Activator	P & H	Label Use Only	
Organic BioLink Manganese Fertilizer 4% Mg	Westbridge Agricultural Products	Magnesium Sulfate	F & SA	Soil deficiency must be documented by testing	
Organic Booster	Soil Restoration	Soil Amendment	F & SA	Soil deficiency must be documented by testing	
Organic Digester	Soil Restoration	Soil Amendment	F & SA	Soil deficiency must be documented by testing	
Phyta-Ger GC Lo-pH	California Organic Fertilizers, Inc.	Acetic Acid	CPA	None	
Phyta-Grow Citrus Avocado Mix 8-5-4	California Organic Fertilizers, Inc.	Blended Fertilizer	F & SA	None	
Phyta-Grow Ichaboe Plus 13-6-2	California Organic Fertilizers, Inc.	Blended Fertilizer	F & SA	None	
Phyta-Grow Red Guano 7-3.5-5	California Organic Fertilizers, Inc.	Guano	F & SA	Contains raw manure. Must be used in compliance with	
Plant-X 21	Bio-Gro, Inc.	Liquid Fertilizer	F & SA	None	
Rinse Aid	Source to Source	Irrigation Water Treatment	CPA	None	
SuperGanic	Agrogonic Products LLC	Blended Fertilizer	F & SA	None	
Sustane 3-4-2	Sustane Natural Fertilizer, Inc.	Blended Fertilizer	F & SA	None	

BNML cont'd from p. 7

Product Name	Company	Sub-Type	Type	Annotations	Int'l Stds*
Sustane 4-6-4	Sustane Natural Fertilizer, Inc.	Blended Fertilizer	F & SA	None	
Sustane 5-2-4	Sustane Natural Fertilizer, Inc.	Blended Fertilizer	F & SA	None	
Sustane 8-2-4	Sustane Natural Fertilizer, Inc.	Blended Fertilizer	F & SA	None	
True 10-5-2	True Organic Products, Inc.	Blended Fertilizer	F & SA	None	
True 12-3-0	True Organic Products, Inc.	Blended Fertilizer	F & SA	None	
True 13-0-0	True Organic Products, Inc.	Feather Meal	F & SA	None	
True 3-6-2	True Organic Products, Inc.	Blended Fertilizer	F & SA	None	
True 4-4-2	True Organic Products, Inc.	Blended Fertilizer	F & SA	None	
True 4-4-6	True Organic Products, Inc.	Blended Fertilizer	F & SA	None	
True 7.5-5-7.5	True Organic Products, Inc.	Blended Fertilizer	F & SA	None	
True 7-7-1	True Organic Products, Inc.	Blended Fertilizer	F & SA	None	
True 8-1-1	True Organic Products, Inc.	Blended Fertilizer	F & SA	None	
True 8-5-1	True Organic Products, Inc.	Blended Fertilizer	F & SA	None	
WEED-A-CIDE	Northwest Agricultural Products	Herbicide	D & PC	Label Use Only	
Woodguard AG	Woodguard	Agricultural Stakes	CPA	None	

WITHDRAWN PRODUCTS

All materials listed below have been withdrawn from the Brand Name Material List as of April 1, 2009. If you are unable to demonstrate that the materials listed below meet the National Organic Standards through other methods (i.e. OMRI or EPA approval), you must discontinue use immediately. The use of unapproved materials may result in compliance actions against organic and/or transitional certification. You may access a complete updated Brand Name Materials List at the WSDA Organic Food Program website: <http://agr.wa.gov/foodanimal/organic/default.htm>.

Product Name	Company	Sub-Type	Type	Annotations
Fishilizer	Port Organic Products Ltd.	Fish Product	F & SA	None
Fishilizer Plus K	Port Organic Products Ltd.	Fish Product	F & SA	None
Hi-Crop Organic Fertil-	Classic Hi-Crop Organic Fertil-	Fish Product	F & SA	None
HumaPhos	Midwestern Bio-Ag Products &	Humic Acid	F & SA	None
K C "Orgalizer" 1-1-2	K C Technology Inc.	Liquid Fertilizer	F & SA	None

BNML cont'd on p. 9

BNML cont'd from p. 8

Product Name	Company	Sub-Type	Type	Annotations
Marizyme	Port Organic Products Ltd.	Fish Product	F & SA	None
Marizyme Birdilizer	Port Organic Products, Ltd.	Guano	F & SA	None
Marizyme Plus K	Port Organic Products Ltd.	Fish Product	F & SA	None
Nalco® 315 FG	Nalco Company	Defoamer	P & H	Label Use Only
NUE Premium Boron 4%	Bio-Gro, Inc.	Boron	F & SA	Soil deficiency must be
NUE Premium Boron 4%	Bio-Gro, Inc.	Boron	F & SA	Soil deficiency must be
NUE Premium Copper	Bio-Gro, Inc.	Copper Sulfate	F & SA	Soil deficiency must be
NUE Premium Copper	Bio-Gro, Inc.	Copper Sulfate	F & SA	Soil deficiency must be
NUE Premium Iron 5%	Bio-Gro, Inc.	Iron Sulfate	F & SA	Soil deficiency must be
NUE Premium Iron 5%	Bio-Gro, Inc.	Iron Sulfate	F & SA	Soil deficiency must be
NUE Premium Magne-	Bio-Gro, Inc.	Magnesium Sulfate	F & SA	Soil deficiency must be
NUE Premium Magne-	Bio-Gro, Inc.	Magnesium Sulfate	F & SA	Soil deficiency must be
NUE Premium Manga-	Bio-Gro, Inc.	Manganese Sulfate	F & SA	Soil deficiency must be
NUE Premium Manga-	Bio-Gro, Inc.	Manganese Sulfate	F & SA	Soil deficiency must be
NUE Premium Zinc 7%	Bio-Gro, Inc.	Zinc Sulfate	F & SA	Soil deficiency must be
NUE Premium Zinc 7%	Bio-Gro, Inc.	Zinc Sulfate	F & SA	Soil deficiency must be
Organic BioLink 5-5-5 Fertilizer	Westbridge Agricultural Products	Blended Fertilizer	F & SA	None
Organic BioLink 5-5-5 Fertilizer	Westbridge Agricultural Products	Blended Fertilizer	F & SA	None
Wonder Grow	Bio Implementation Group Inc.	Foliar Fertilizer	F & SA	None
Yeoman brand OR-Stick	Northwest Agricultural Prod-	Spray Adjuvant	D & PC	Label Use Only

Natural Beef certification

Senator Ken Jacobsen (D, Seattle) has sponsored a bill that would establish a Naturally Raised Beef and Naturally Raised Grass-fed Beef Certification Program. To qualify as Washington-certified natural beef cattle, cattle must be born and raised in Washington and raised and finished in compliance with the USDA voluntary marketing standard for naturally raised livestock and meat products. The USDA standard requires that cattle: 1) be raised without growth hormones or antibiotics and 2) have never been fed animal by-products. To qualify as Washington-certified natural grass-fed beef cattle, cattle must meet the requirements of Natural Cattle and be raised and finished in compliance with the USDA voluntary marketing standard for grass-fed livestock and meat products. Check with the Washington State legislature <http://www1.leg.wa.gov/legislature> to follow the status of this bill.

Detecting fertilizer fraud

Controversy in the liquid fertilizer industry has spurred additional interest in developing testing methods to distinguish between natural and synthetic fertilizers. The science is challenging since many materials used as synthetic fertilizers also occur naturally in products allowed in organic production, although at much lower concentrations.

Nitrogen isotope ratio testing is one method which is advocated to distinguish between natural and synthetic fertilizers. Most nitrogen exists as a ^{14}N isotope. The mass number (14) indicates that nitrogen contains seven protons and seven neutrons in the nucleus. A much smaller percentage of nitrogen exists as a ^{15}N isotope and contains an extra neutron. Biochemical processes within the nitrogen cycle fractionate ^{15}N and ^{14}N . This leads to enrichment of ^{15}N in plant and animal derived materials when compared to nitrogen present in the air. Fertilizers synthesized from atmospheric nitrogen (e.g. ammonia, urea) do not contain this additional ^{15}N .

The relative amount of ^{15}N enrichment in a sample can be detected and quantified using an Isotope Ratio Mass Spectrometer (IRMS). The number is reported as a $\delta^{15}\text{N}(\text{‰})$ value, where $\delta^{15}\text{N}$ of atmospheric nitrogen = 0‰. The reported $\delta^{15}\text{N}$ of most synthetic fertilizers are approximately 0‰. Natural-based fertilizers generally have $\delta^{15}\text{N}$ values greater than 4‰.¹

The $\delta^{15}\text{N}$ value is not an absolute indicator for determining whether a fertilizer is natural or synthetic. Some plant-based materials also have $\delta^{15}\text{N}$ values similar to those reported for synthetic fertilizers. IEH Laboratories & Consulting Group in Lake Forest Park, WA currently analyzes samples for $\delta^{15}\text{N}$ at a cost of \$95.00 per sample. WSDA is considering $\delta^{15}\text{N}$ testing as a requirement for organic fertilizers on the Brand Name Material List. Material registrants will be notified of any changes to the registration requirements for nitrogen fertilizers in the future.

Arrivals and Departures



Nathaniel Lewis, the newest member of our team, joined us in the beginning of March, 2009. He brings with him, scientific knowledge from his academic work in agricultural science and organic chemistry and practical agricultural experience from running his own farm. He graduated from The Evergreen State College with a Bachelor's of Science in the spring of 2006. Since 2003, he has operated a small-scale diversified farm with his wife, Melissa Barker. Together, they have grown mixed vegetables for a 40-member CSA program, raised hogs for custom slaughter, and produced pastured broilers that they slaughter on-farm for local consumers. Nathaniel will work reviewing Organic crop producer files.

Photo by Mike Louisell

Kristy Jones, Administrative Coordinator, left the program in mid-February for a job with the Social Security Administration. The Administrative coordinator job duties are being shared between Elizabeth Apley and Christa Bemis at this time. The state hiring freeze has delayed our ability to fill this position.

We bid farewell to **John Morrison**, an inspector with the Program since May 2000 who resigned in March to pursue other endeavors. John's inspection area included a large region from the Canadian border to Oregon along the eastern part of the state. The work that John performed for WSDA over the last 8 years has helped protect organic integrity and supported the development of organic agriculture. His ability to handle all types of organic inspections, including both US National Organic Standards and International Organic Standards, was an asset to the program. We wish John all the best in his next endeavors.

Canadian Organic News

Canadian Organic Regime Moves Towards Finalization

On February 14th Canada's Organic Products Regulation (OPR) was published. The regulation, now in the midst of a 75 day comment period before being finalized, can be found at <http://laws.justice.gc.ca/en/SOR-2006-338>. The new OPR provides clarification on scope, accreditation, certification, imports, exports, and labeling requirements – including a new Canada organic logo, permitted for use on all 95% organic products. The OPR also provides the regulatory authority to the Canadian Organic Regime and the enforcement of the Canadian Organic Standards that were published in January 2009 (CGSB-32.310 and 311-2006 - Amended October 2008).

The Canadian Organic Regime is scheduled for full implementation on June 30, 2009. A two year implementation of the new requirements is anticipated before the requirements must be met in full for all organic products that are sold, labeled, or represented as “organic” in Canada. WSDA Organic Program is now offering certification in accordance with Canada standards through the WSDA International Organic Program. For more information on how to apply for this additional certification, contact Brenda Book, Organic Certification Coordinator, at (360) 902-2090 or bbook@agr.wa.gov.



Canadian Certifier Training

On February 23-24 WSDA Organic Program staff attended training in Abbotsford, BC on the new Canadian Organic Regime. The Independent Organic Inspectors Association (IOIA) led the training in collaboration with the Canadian Organic Growers, Organic Trade Association, and Canadian Food Inspection Agency. Brenda Book, Organic Certification Coordinator, and Del Long, Eastern WA Field Supervisor, participated in two day workshop that provided an overview of the new Canadian Organic Regime (COR), plus detailed discussion of all aspects of the new standards. Key differences between the Canadian standards and those of major trading partners such as the US were also discussed. The information gleaned from this collaborative workshop will be used to ensure all Organic Program staff receives the proper training to evaluate WSDA certified operations in accordance with the new standard.

Organic Greenhouse Guidelines

The WSDA Organic Food Program has developed guidelines to help producers better understand organic standards as they relate to greenhouse production. The following points address common concerns regarding the production of organic crops in a greenhouse setting.

Sites

Greenhouses must be **located** on a certified organic site or certified as a separate organic site.

- **Production of crops in soil** within a greenhouse requires that the land in the greenhouse has not had any prohibited materials applied for 36 months prior to harvest.
- Production on **benches and in containers** does not require the 36-month transition. For bench and container systems there needs to be documentation that the greenhouse sidewalls and ceiling/overhead has been cleaned with approved cleaners and is free of residual pesticides that would contaminate the organic crops.

Transplants

Transplants must be grown with organic practices as described in the Organic System Plan.

- **Annual Transplants** – Annual transplants must be grown from organic seeds unless organic seeds are commercially unavailable. Organic greenhouse operations must have documentation from at least 3 organic seed supply companies that organic seeds are not commercially available. In addition, purchased transplants intended to produce an organic crop must be from a certified organic source.
- **Perennial Transplants** – Perennial transplants must be produced from organic planting stock or organic seed. If organic planting stock or organic seed is not commercially available then nonorganic seeds/planting stock may be used. Perennial planting stock must be under organic management for not less than one year prior to selling the planting stock as organic perennial transplants.

Greenhouse Guidelines cont'd from p. 11

Materials

Materials for use in organic production must be from non-synthetic sources or be listed on the National List (205.601)

- **Potting Medium** – Just because the bag says it is organic does not necessarily mean it is. Make sure the potting soil is approved through the current WSDA Brand Name Materials List or the OMRI Product List. Potting soil mix may contain non-disclosed ingredients including synthetic fertilizers and wetting agents.
- **Rooting Hormones** – Synthetic rooting hormones are prohibited in organic production. A strike, scion wood or cutting treated with a synthetic rooting hormone must be under organic management for one year prior to being sold as organic.

Use of Manure

Non-composted manure must not be applied within 90 days of harvest for crops where the edible portion does not contact the ground or 120 days for crops where the edible portion does contact the ground. [NOS 205.203 (c)(1)].

- **Container Crops** – Organic crops grown to harvest in containers where the potting soil contains manure must be harvested in accordance with [NOS 205.203 (c)(1)].
- **Transplants** – Organic crops that are grown in potting soil that contains manure but transplanted into a certified organic field must comply with the 90/120 day time restriction.

Treated Wood

Greenhouses may be constructed with treated wood provided that the treated wood does not have contact with any portion of an organic crop, roots or contact the soil in the area of production.

Crop Rotation

Does not apply to container-only production greenhouses. The producer of crops grown in the soil with a greenhouse cover must implement a crop rotation as noted in [NOS 205.205].



Treated Wood Guidelines

National Organic Standards 7 CFR Part 205 Section 205.206

Certification Criteria for Use of Treated Wood

The WSDA Organic Food Program receives numerous questions each year regarding the use of treated wood in organic production systems. The National Organic Standards state that “the producer must not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock.” To help clarify issues relating to treated wood, the program has developed a Question and Answer sheet, also available on our website.

Common Questions about the Use of Treated Wood in Organic Production

Q: I am installing a new fence around my organic site. Can I use treated wood?

A: You may use treated wood if the organic crop does not come into contact with the treated wood or the soil around the treated wood. In organic livestock production, animals must not be allowed contact with the treated wood or pasture in proximity to the treated wood.

Q: I am installing a new trellis system in my organic orchard/vineyard. Can I use treated wood in my new system?

A: No. In organic and transitional sites, treated wood cannot be used for any structure that will come into contact with crops or soil used to produce organic crops.

Q: I am installing a new greenhouse. Can I use treated wood?

A: Treated wood is prohibited in greenhouses where the wood is in contact with the organic crop, roots or the soil in the area of production. Treated wood may be used in greenhouses that produce organic crops on benches in flats, pots or other approved containers provided the organic crop does not come into contact with the treated wood.

Q: I am in the process of a construction project on my farm and I would like to use treated wood. If I wrap the treated wood in something or sink treated wood posts into concrete prior to installation, can I use treated wood?

A: No. Except where indicated in this document, treated wood may not be used, even when a barrier is placed between the treated wood and the soil. It is important to note that buildings such as sheds, loading docks and homes are not included as part of the organic production site and all applicable building codes should be followed. If crops and livestock are grown adjacent to these buildings, efforts should be made to exclude the crops and livestock from contact with the treated wood.

If livestock are housed in a barn constructed of treated wood, animals should be restricted from contacting the treated wood.

Q: I have just purchased/leased an orchard that has treated wood in the trellising. Can I bring this orchard into the organic program?

A: As with any other site, organic certification of the orchard will be subject to the requirement that no prohibited materials, including treated wood, be applied in the 36 months prior to the first organic harvest date.

Q: I need to replace a treated post in my organic orchard. I have treated posts in an area of my organic site that is no longer in production. Can I reuse these treated posts in other areas of my orchard?

A: No. National Organic Standards do not allow for the use of treated posts for new or replacement purposes.

Treated Wood cont'd from p. 13

Q: I could not find any materials other than treated wood that would suit my needs on my organic site. I went ahead and installed treated wood. Can my site still be considered organic?

A: No. Because treated wood is considered a prohibited application, unless used in an allowed application as outlined in this document, your site must transition back to organic status. The site will be eligible for organic status after 36 months from the date on which you installed the treated wood.

NOP citations and further reading

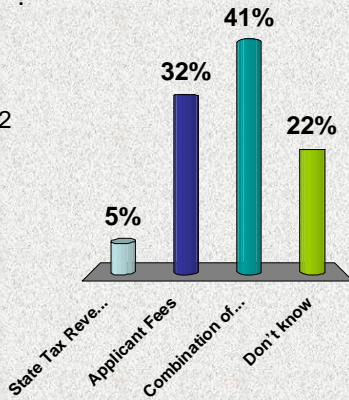
- From National Organic Standards 7 CFR Part 205 Section 205.206:
(f) The producer must not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock.
- From Production and Handling Preamble, Subpart C: Organic Crop, Wild Crop, Livestock and Handling Requirements:
The producer must not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes that comes into contact with soil or livestock.
<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELDEV3003494&acct=noprulemaking>
- National Organic Standards 7 CFR Part 205 Section 205.206(f) of the NOP Final Rule states that “a producer must not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock.” The Preamble (Crop Production--Changes Based on Comments (7)) elaborates on 205.206(f) as follows:
“This provision prohibits the use of lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with an organic production site. We included this modification to clarify that the prohibition applies to lumber used in direct contact with organically produced and handled crops and livestock and does not include uses, such as lumber for fence posts or building materials, that are isolated from production. The prohibition applies to lumber used in crop production, such as the frames of a planting bed, and for raising livestock, such as the boards used to build a farrowing house.”
- Organic Food Program’s Treated Wood Policy POL-OFP 038
- National Sustainable Agriculture Information Service publication “Organic Alternatives to Treated Wood”; <http://attra.ncat.org/attra-pub/lumber.html>

January Producer Survey

The following questions were a part of an interactive audience survey conducted in January of 2009. Each participant in the audience was given a wireless device to vote on each of the questions. There were 75 producers and a total audience of approximately 100. Participants answered only the questions that pertained to them. For example, the farming questions were answered only by the producers, while general questions could be answered by the whole group. The software counted how many individuals answered each question. Results were tabulated immediately and shown to the audience. On the following page are some results of the survey.

WSDA Organic Food Program gets its budget from ?

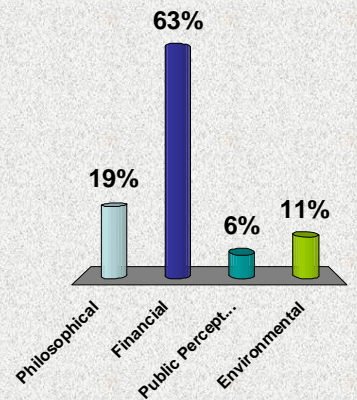
1. State Tax Revenue
2. Applicant Fees
3. Combination of 1 and 2
4. Don't know



The correct answer above is #2, Applicant Fees

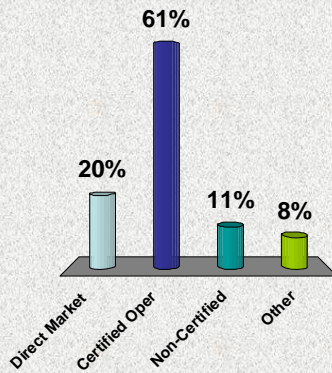
Reason for growing organic

1. Philosophical
2. Financial
3. Public Perception
4. Environmental



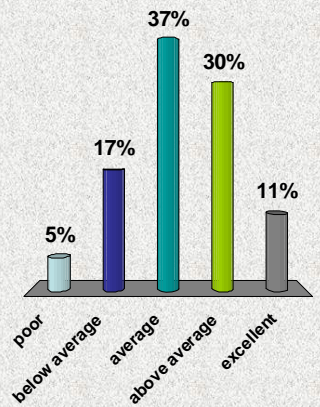
Please rate what part of maintaining integrity is most important.

1. Surveillance of Direct Markets (Farmer's Markets)
2. Surveillance of Certified Operations
3. Surveillance of Non-Certified Operations
4. Other



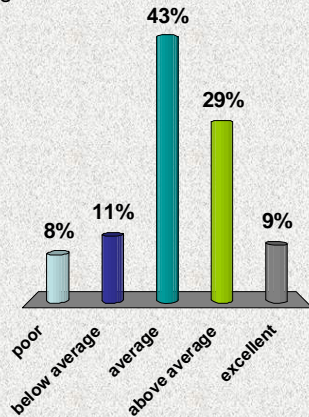
Rate on a scale of 1-5 how well we are meeting your expectations regarding timeliness.

1. poor
2. below average
3. average
4. above average
5. excellent



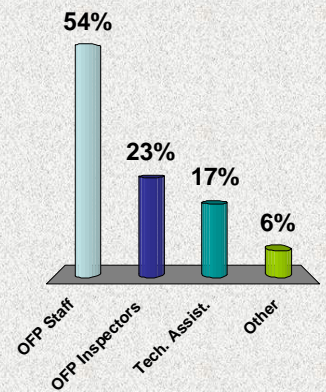
Rate on a scale of 1-5 how well are we meeting your expectations regarding Communication.

1. poor
2. below average
3. average
4. above average
5. excellent



Rate what part of Communication is most important?

1. Availability of OFP staff by phone or email
2. Availability of Inspectors
3. Technical Assistance
4. Other



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And the maize-field grew and ripened,
Till it stood in the splendor
Of its garments green and yellow.
- *Henry Wadsworth Longfellow*

Upcoming Events:

Organic Summit

Nell Newman, co-founder and president of Newman's Own Organics, will be the keynote speaker at the Organic Summit (www.theorganicsummit.com), June 3-5, 2009, in Stevenson, WA. Ms. Newman will participate in a presentation with Bob Scowcroft, executive director of the Organic Farming Research Foundation (OFRF) where they will discuss engaging a social-networking generation in the important social, economic, and environmental values delivered by organic food production. "Nell is a groundbreaker and long-time supporter of organic agriculture and industry. She has contributed to the evolution of the industry and organic products being found in every household across the country," said Scowcroft, whose foundation is a partner in creating the Organic Summit.

The Organic Summit provides leaders in the organic industry as well as top executives from leading conventional food companies a forum for in-depth discussion of the business issues that impact the future of the organic industry. New Hope Natural Media and the Organic Farming Research Foundation have partnered to facilitate these discussions. Participants in the Organic Summit are leaders in the organic industry representing all stakeholder groups. The Organic Summit provides a singular opportunity for these groups to come together and have equal voice. Past conferences have attracted a diverse selection of leaders in their field including small family farmers producing food organically. Other speakers include Miles McEvoy, WSDA Organic Program Manager, who will be speaking on protecting organic integrity and enforcing organic standards.

Tilth Producers of Washington Farm Walks

For the sixth year, Tilth Producers of Washington and Washington State University's Small Farms Team are offering a series of educational Farm Walks for growers. Farm Walks bring growers and agricultural specialists together to learn on working farms across Washington. Together you will observe problems and solutions firsthand, share your knowledge and discover new tools and techniques for organic and sustainable farm management. Each Farm Walk includes a tour led by the host farmer, a booklet of handouts and onsite specialists to serve as resources.

Visit www.tilthproducers.org for schedules and more information.