

THE CULTIVATOR

NEWS FROM THE CORNUCOPIA INSTITUTE

WINTER 2014

Nonprofits Versus Agribusinesses (Again)

National Organic Standards Board Meets in Louisville, Kentucky

BY LINLEY DIXON, PhD and
REBECCA THISTLETHWAITE

The National Organic Standards Board (NOSB) held their semi-annual public meeting in late October in Louisville, Kentucky. The NOSB is a 15-member volunteer board, appointed by the Secretary of Agriculture, which reviews all substances used in organic food and farming and recommends policy. As usual, The Cornucopia Institute was front and center to witness the proceedings, testify, and record the votes and comments made by each NOSB member.

Last spring's NOSB meeting, in San Antonio, opened with protestors voicing their displeasure with the USDA's unilateral changes weakening the "sunset" policy, which requires a review of all synthetic and non-organic material every five years. This fall's meeting, featuring a prominent physical barrier to discourage demonstrators from coming to the front of the room, opened with several impassioned public testimonies criticizing the USDA's corporate-friendly policy changes.

Cornucopia Codirector Mark Kastel set the tone for the meeting with his opening public comment stating that the USDA is not hearing the public's message of discontent. Kastel further suggested that weakening the sunset responsibilities of the board



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violates the spirit and letter of the law.

Jim Gerritsen, representing the Organic Seed Growers and Trade Association and a Cornucopia policy advisor, criticized the appointment of individuals to NOSB slots that don't fit the legal criteria (especially farmer slots). During both the Bush and Obama administrations, corporate agribusiness officials have been appointed to NOSB slots designated for independent voices. Gerritsen also commented that contamination from genetic engineering prevents organic farmers from exercising their right to farm the way they choose, free from contamination.

Aimee Simpson, staff attorney for Beyond Pesticides, received vigorous applause after her detailed Power-Point presentation outlining specifics on how the new sunset process arbitrarily established by the USDA violates several aspects of the Organic

Farmers, citizens, activists and policy experts spoke out on the USDA's handling of the National Organic Program. GMO crop contamination, herbicides in compost, and synthetic additives also came up for discussion at the Fall 2014 NOSB meeting.

Foods Production Act of 1990 (OFPA).

Cornucopia's Dr. Linley Dixon commented on the damage to organic farms done by persistent herbicides that remain in compost, many of which take several years to break down. She called for the organic community, the NOSB, and the National

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Yogurt: Healthy Staple or Junk Food?

Cornucopia's New Report Helps You Choose the Best Brands

For centuries, yogurt has enjoyed a well-deserved reputation as one of humanity's healthiest foods. Milk from grass-fed cows fermented using live cultures results in a wholesome, live food teeming with beneficial microorganisms.

Yet giant food corporations, led by General Mills (Yoplait) and Groupe Danone (Dannon), and joined by Walmart, PepsiCo and others, have managed to turn this healthy staple into quasi-junk food.

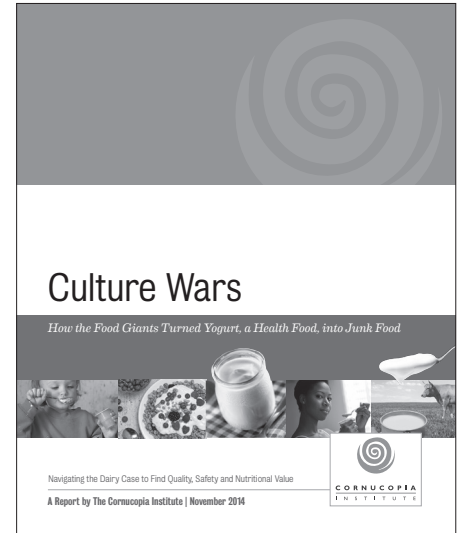
The Cornucopia Institute has released a comprehensive report on the yogurt industry, *Culture Wars: How the Food Giants Turned Yogurt, a Health Food, into Junk Food*. The accompanying buyer's guide rates 114 brands to help shoppers choose the best and most healthful products.

Cornucopia's report reveals that many conventional brands, heavily marketed as "health food," contain ingredients that are anything but, such

as aspartame, a suspected neurotoxin; artificial colors, linked to ADHD in children; and sugar levels that rival those in Twinkies. Additionally, conventional yogurt is generally produced with milk from confined cows injected with antibiotics and fed GMO grain, which is treated with herbicides such as Monsanto's Roundup.

Based on independent laboratory testing, Cornucopia's study found that many organic yogurt brands were nutritionally superior to conventional brands, containing higher levels of probiotics than those displaying the "Live and Active Cultures" seal. Organic also won in omega-3 to omega-6 fatty acid ratios and beneficial fats such as conjugated linoleic acid (CLA).

Cornucopia encourages shoppers to purchase minimally processed, organic brands, rewarding farmers who practice sound environmental stewardship and humane animal husbandry. ☺



Find the new report under the "Reports" tab and the buyer's guide under "Scorecards" at www.cornucopia.org



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Eye in the Sky Exposes “Organic” Factory Farms

Massive Livestock Operations Multiply While USDA Enforcement Languishes

BY MARK A. KASTEL

In what has been called one of the largest fraud investigations in the history of the organic industry, The Cornucopia Institute recently filed formal legal complaints against a dozen industrial livestock operations producing, allegedly illegally, milk, meat, and eggs marketed as organic.

After years of inaction by the USDA, Cornucopia contracted for aerial photography in nine states, from Texas to New York and Maryland, over the past eight months. What we found confirmed earlier site visits: a systemic pattern of corporate agribusinesses operating industrial-scale confinement livestock facilities providing no legitimate grazing, or even access to the outdoors, as is required by federal organic regulations.

The organic law makes it very clear that all organic livestock *must* have access to the outdoors and that ruminants, like dairy cows, must have access to pasture. Yet the vast majority of these massive facilities, managing as many as 10,000 dairy cows and upwards of 1 million laying hens, had 100% of their animals confined in giant buildings or feedlots at the time they were photographed.

The family-scale farmers who helped commercialize the organic food movement starting in the 1980s did so, in part, because agribusiness consolidation and control of the food supply was squeezing profit margins and forcing farmers off the land. Con-



Photos by The Cornucopia Institute

One of Aurora Dairy’s two feedlots in Dublin, Texas. Virtually all of the surrounding fields, which could be used for pasture, have been recently cut and baled for hay. There is effectively no pasture available to the dairy herd.

sumers enthusiastically made organics a rapidly growing market sector by supporting farmers and processors that were willing to produce food to a different standard in terms of environmental stewardship, humane animal husbandry, and economic fairness for farmers.

Health- and eco-conscious shoppers, who passionately support the ideals and values represented by the organic label, understandably feel betrayed when they see photos of these massive CAFOs (concentrated animal feeding operations) masquerading as organic. And family-scale organic farmers are similarly being driven off the land today.

USDA Inaction

Cornucopia filed our first legal complaints against these industrial operations beginning in 2004, with varying degrees of success. As a result, the

“Someone needs to take responsibility for the divide in this industry, which has begun seriously undercutting the credibility of the organic label and the livelihoods of ethical organic farmers.”

—Jay Feldman, NOSB member

largest dairy supplying the Horizon label (now controlled by WhiteWave Foods) was decertified, and the USDA placed sanctions against Aurora Dairy (producing private-label organic milk for Walmart, Costco, Target and various supermarket chains). Both WhiteWave and Aurora are currently being investigated by the USDA for improprieties.

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To view a photo gallery of over 80 aerial images of these giant livestock operations, visit www.cornucopia.org/flyovers



EYE IN THE SKY

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But the wheels of justice are turning slowly—if at all. One example is Arizona-based Shamrock, which operates a vertically integrated dairy in the desert near Phoenix that jointly manages over 16,000 organic and conventional cows. The USDA eventually confirmed the basis of a complaint filed by Cornucopia in 2008, finding the dairy was operating illegally—but not until 2011, three years later.

Now, more than six years later, Shamrock still has a pending appeal and continues selling milk in the Southwest undercutting ethical farmers and competitors that comply with federal organic law.

In the case of the Horizon dairy, instead of the USDA sending its own agents to investigate complaints against the operation, the USDA sent in the same certifier *that initially approved the operation*, Quality Assurance International, to investigate alleged improprieties.

“This is unconscionable,” said Cornucopia Codirector Will Fantle. “The job of the USDA is to oversee the certifiers and ensure that they are doing their job. It is quite possible that, in this case, the certifier may have been responsible for negligence.”

Kevin Engelbert, a fourth-generation farmer and dairyman based in Upstate New York, stated, “The USDA’s inaction places thousands of ethical family-scale farmers, who are competing with a couple dozen giant dairies, at a competitive disadvantage.” Engelbert Farms, which milks 140 cows, was the first certified organic dairy in the U.S.

Engelbert, who served on the USDA’s National Organic Standards Board (NOSB) from 2006 to 2011, recalled, “When serving on the NOSB, I was always reminded that the recommendations we made to the National Organic Program (NOP) had to be scale-neutral.” This is because there is nothing in the federal organic standards pertaining to the size of any given operation. “I would like to see the Organic Food Production Act *enforced* on a scale-neutral basis as well,” he said.

While scale-neutral, the federal organic standards, if properly enforced, are scale-limiting—meaning that at some point the magnitude of these operations makes it impossible for them to meet minimum organic and humane livestock standards.

With enforcement of neither the letter of the law nor the intent, many traditional organic dairy farmers are in financial stress right now, with some selling their cows and exiting the industry.



On Engelbert Farms, the nation’s first certified organic dairy, the cows are intensively grazed.

“The USDA’s inaction places thousands of ethical family-scale farmers, who are competing with a couple dozen giant dairies, at a competitive disadvantage.”

—Kevin Engelbert, fourth-generation organic dairyman

“Allowing these illegal dairies to continue to operate is a travesty and significantly undercuts the supply-demand dynamic that should be rewarding farmers in the marketplace and providing a decent living for our families,” Engelbert stated.

Agribusiness Collusion Is Non-Partisan

Although Cornucopia was critical of the USDA’s operation of the National Organic Program (NOP) during the Bush administration, we find the current conduct of the Obama administration even more insidious.

“The so-called ‘Age of Enforcement’ the organic community was promised when the new administration took over in 2009, has been anything but with regard to large-scale ‘organic’ operations breaking the law,” continued Engelbert, a Cornucopia board member.

During the Bush years the USDA was charged as being hostile to organic interests delaying the implementation of the law and then being recalcitrant in carrying out the will of Congress by enforcing the standards.

Since President Obama was elected, the USDA has expanded the NOP’s budget, added competent staff, and said all the right things. However, “they have sided with the powerful industry lobby, the Organic Trade Association, and institutionalized corruption that started before their administration took office,” said Cornucopia’s Fantle.

In the chicken industry, the USDA has allowed corporate agribusiness to confine as many as 100,000 laying hens in a building, sometimes exceeding 1 million birds on a “farm,” and substituting a tiny screened porch for true access to the outdoors.

The loophole, “porched-poultry,” was first allowed in 2002 when the then-NOP director overruled organic certifiers and allowed The Country Hen, a Massachusetts egg producer, to confine tens of thousands of birds in a building with an attached porch that might, at best, hold 5% of the birds in the main building.

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The USDA staff person running the organic program at that time later waltzed through what is commonly referred to as “the revolving door,” between regulators and the industry, and went to work as a consultant for The Country Hen lobbying against outdoor access standards for poultry.

Organic eggs from chickens that are allowed, as the law requires, to engage in their instinctive behaviors as omnivores in foraging on grass and insects, produce eggs that are coveted as being more nutritious and more flavorful.

Cameron Molberg, a certified organic egg producer, rotates 19,000 birds on pasture near Austin, Texas. “We keep expanding our flock but still can’t keep up with demand,” he explained. “We are proving that this model can be highly successful in the marketplace.”

Similarly, peer-reviewed, published research indicates clear nutritional advantages in consuming milk and meat from cattle that are grazed on fresh grass, including elevated levels of omega-3 fatty acids.

Consumer Trust in the Organic Label at Risk

Some industry observers contend that even more important than organic farms and marketers adhering to the letter of the law, is meeting the expectations of consumers who are willing to pay a premium for food produced to a higher standard.

Organic consumers, who rightly assume that the animals producing their food are being treated respectfully, and consequently produce higher quality food, are being taken advantage of in the marketplace by some producers.

Significantly, Consumers Union, publisher of *Consumer Reports* magazine, recently downgraded the value of the organic seal from their highest rating due to concerns about the USDA’s recent attempts to undermine the power and independence of the National Organic Standards Board (see cover story).

“The current situation, applauded by the industry’s most financially powerful interests, and almost universally condemned by nonprofits representing farmers and consumers, is untenable,” said Jay Feldman, Executive Director of Beyond Pesticides and a current Obama administration appointee to the 15-member NOSB.

Feldman continued, “Someone needs to take responsibility for the divide in this industry, which has begun seriously undercutting the credibility of the organic label and the livelihoods of ethical organic farmers.” ☺



Herbruck’s organic poultry operation, Green Meadow in Saranac, Michigan, is licensed to house 1 million laying hens. Note the semi-trailers at front for a sense of this facility’s enormous scale.



A close-up of the neatly mowed lawn between Green Meadow’s henhouses shows there are no birds outside. The structures have screened walls but no apparent outdoor access, as is required by organic standards.

Cornucopia’s scorecards rating brands of organic dairy, eggs, soy foods, and breakfast cereals help you choose the best foods while rewarding the true organic heroes. Click the “Scorecards” tab at www.cornucopia.org.

Cornucopia’s latest report and buyer’s guide, *Culture Wars: How the Food Giants Turned Yogurt, a Health Food, into Junk Food*, is described on page 2 of this issue.



Is Your Pet's Food as Safe as You Think?

5 Tips to Keeping Your Furry Friend Healthy and Well Fed

BY LINLEY DIXON, PhD

Pet food quality varies significantly and all too often includes dangerous chemical additives.

In many cases consumers get what they pay for, but price doesn't always indicate high quality. The good news is that discriminating shoppers will soon have a new tool helping them to weed through product labels and separate the good from the bad.

The Cornucopia Institute has completed a thorough analysis of the pet food industry and will release a detailed report this winter.

Our study reveals that many complete diet products significantly sway from the natural, wild diets of cats and dogs in terms of protein, fat and carbohydrate percentages. The majority of both dog and cat food product formulations contain too many grains and starches, including corn, wheat, rice, oats, peas, and potatoes. In addition, many products contain questionable and/or unnecessary ingredients.

Meanwhile, among the most common causes of death for both cats and dogs are diseases affiliated with poor diet including obesity, cardiovascular disease, gastrointestinal diseases and cancer.

Cornucopia's report examines specific ingredients to avoid and includes a web-based buyer's guide that will help consumers find high quality and safe pet foods. In the meantime, the following tips will help you get started finding the best food for your cats and dogs.

1. Avoid carrageenan:

You may be unknowingly harming your pets by feeding them wet food, even from the most expensive "premium" brands—despite extra care taken to find formulations high in



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In recent years, anecdotal reports by veterinarians suggest there has been a spike in serious intestinal maladies in pets. Americans spend about \$22 billion on pet food each year.

animal-based proteins, low in fat and carbohydrates, and even USDA certified organic. Our research found that greater than 70% of canned pet foods contain carrageenan, a non-nutritive food stabilizer extracted from red seaweed. Peer-reviewed and published research indicates that carrageenan is known to cause intestinal inflammation with the potential to lead to cancer, even in small doses.

Carrageenan is a non-nutritive thickener and emulsifier that can easily be replaced by safer alternatives in pet foods, including tomato paste, guar gum, potato starch, pea starch, tapioca, and garbanzo bean flour.

New independent research (published in 2014) at the Jesse Brown VA Medical Center in Chicago, using both human and mouse epithelial cells, further demonstrates the mechanism by which inflammatory responses occur after carrageenan

exposure using doses less than the anticipated average daily intake (50 mg/30 g mouse vs. 250 mg/60 kg person). This research demonstrates for the first time that carrageenan-induced inflammation occurs in both humans and mice, indicating that it is likely to cause a similar reaction in all mammals, including cats and dogs.

Pets that eat primarily wet food with carrageenan will consume daily doses of carrageenan in amounts known to cause inflammation. In fact, inflammatory bowel disease (IBD) in cats is the most common cause of vomiting and diarrhea.

Unfortunately, policy changes are often years behind the latest scientific research due to corporate lobbying and industry-funded studies that conflict with independent research.

Some pet food brands are now

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advertising that they do not include carrageenan, such as Zignature dog food and Weruva cat food. Meanwhile, Hill's Science Diet contains carrageenan, despite the label stating the brand is "veterinary recommended."

2. Buy organic (but without carrageenan):

Many high-end "natural" pet foods contain carrageenan—and even Newman's Own Organics wet cat food (which is not actually certified organic but, rather, "made with" organic ingredients) contains the ingredient. Organic foods should be a safe haven from chemical residues, antibiotics *and* questionable synthetic ingredients. Sadly, in this case, pet owners need to pay extra attention.

There are two USDA Organic wet dog food brands that do not contain carrageenan: Organix and Cocolicious. However, there are no certified organic cat food brands that do not use carrageenan in at least one of their flavors. It is important to read each product label: Organix cat food shredded chicken flavors, for example, contain carrageenan although the majority of the brand's flavors do not.

3. Don't fall for non-GMO claims (unless you see the USDA Organic label):

Some pet food brands, such as Wellness, advertise that they are "made with naturally GMO-free ingredients." This is likely an intentionally misleading claim. Without the USDA Organic label, you can assume that the feed given to the livestock used to produce these pet food products is almost certainly GMO.

Wellness brand products do not display the USDA Organic seal. Over 90% of the soybean and corn currently produced in the U.S. is GMO. Though pet foods can test to be GMO-free, this does not mean that the meat animals were fed GMO-free feed throughout their life.



Above: Moe, the longtime feline companion of Codirector Mark Kastel. Sadly, just after Cornucopia completed its report on carrageenan in human food, Moe died in 2013 of intestinal cancer likely linked to carrageenan in his diet.

The USDA Food Safety Inspection Service has only recently approved a non-GMO label for meat *only* if that producer can prove all the animal feed required to feed the number of animals owned is GMO-free. This label is currently missing from all pet food brands, despite non-GMO claims. Thus, only the presence of the USDA Organic label reliably ensures that meat animals were fed non-GMO grain.

4. Avoid these ingredients, too:

Pet food manufacturers don't advertise the fact that pet food is composed primarily from food industry waste. Animal fat and animal meat and bone meal (MBM) are common pet food ingredients that are products of rendering (boiling waste products to sterilize them). **Animal fat** and **MBM** often come from a mix of different animal species, including expired grocery store meat, animals that died on the farm, and restaurant scraps, including used grease from deep-fat fryers.

Animal fat and MBM are the ingredients in pet food most likely to correlate with the presence of sodium pentobarbital, the drug used by veteri-

narians and shelters for euthanasia. Needless to say, these are not ingredients you want your dog and cat to be eating.

Corn gluten meal should also be avoided. It is used primarily as a cheap substitute for meat since cats and dogs are carnivorous and should have diets primarily based on meat.

In addition, synthetic preservatives should be avoided, including **BHA**, **BHT**, and **propyl gallate**, since research has linked them to several health concerns, including cancer. Natural preservatives, such as ascorbic acid (vitamin C), tocopherols (vitamin E), and plant-based oils (such as rosemary oil), are better alternatives.

5. Home-cook your pet's food:

One way to ensure a healthy diet for your companion animals is to cook for them yourself. Many chronic problems such as allergies, vomiting, diarrhea, and skin problems can be solved with homemade meals. Cornucopia's report provides veterinarian-approved recipes and advice for cooking at home for both cats and dogs.

In conclusion, the pet food industry is no different than leading marketers of human food when it comes to cheap substitutes and false health claims. Take matters into your own hands by reading labels and choosing high quality ingredients. Cornucopia's soon-to-be-released report can help you. ☺

Watch for the release of the Pet Food Guide this winter. Also available at cornucopia.org: The report *Carrageenan: The "Natural" Additive that's Making Us Sick*, the Carrageenan Shopper's Guide, and a questionnaire on the effects of eliminating carrageenan from the diet.



NOSB

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Organic Program (NOP) to demand that the EPA ban all persistent herbicides, especially aminopyralids and other pyridine carboxylic acids. The NOSB will invite an expert panel to discuss the topic of contamination of farm inputs at the next meeting, in April 2015, and encourages public comment relating to this matter.

Cornucopia farm policy analyst Rebecca Thistlethwaite pointed out that the NOSB has asked for the NOP to produce a list of animal vaccines produced with excluded methods (GMOs), but the NOP has failed to deliver such a list. She also addressed the fact that technical reviews provided to the NOSB to critique petitioned or sunseting materials are often outdated and lacking important information necessary to properly review each material.

Several citizen-lobbyists for The Cornucopia Institute delivered impressive technical comments and added compelling personal testimony as to why they were willing to travel to Louisville as avid supporters and consumers of organic foods. Cornucopia policy advisor Mitch Blumenthal, an organic farmer and produce distributor from Florida, expressed concerns over the need to keep organic products and seeds free of GMO contamination.

Cornucopia Codirector Will Fantle pronounced his dismay at the lack of enforcement against the Shamrock factory dairy in Arizona, which is still operating despite several organic violations found by the USDA in 2011. He also urged that new technical reviews be completed for the more than 100 synthetic and non-organic materials coming up for review in 2017.

Two promising changes from the latest meeting include the fact that the elected NOSB chairperson is once again chairing the meeting (rather



Citizen-lobbyists Robin Migalla (l) and Joan Levin testified at the meeting.

than NOP director Miles McEvoy). The NOP also reinstated the Policy and Procedures Subcommittee that the USDA had discontinued. This committee is currently working on developing a new policy on annotations that had previously been used to limit the way specific synthetic materials could be used (annotations have been banned at sunset by the NOP).

When NOSB deliberations took center stage after the public comment session, some board members attempted to circumvent the new sunset policy using a series of legal maneuvers.

Several board members admitted that they voted against relisting some materials in subcommittee just so that they could bring the material to a full-board vote (prior to the sunset changes, the full board always voted on each material). Board member Francis Thicke, an organic farmer sitting in one of the three environmentalist seats, commented that this practice—a member voting to remove a substance in a subcommittee without intending to vote that way when the full board votes—is misleading and confusing to the public. This disingenuous “work-around” was now being challenged by some of the independent board members.

It was also alleged that the new sunset procedures violated the law because each material formerly required a full board vote by the NOSB.

In particular, Jay Feldman of Beyond Pesticides raised a point of order challenging the way the motion to remove tragacanth gum was brought to the board. After much debate, the procedural motion failed 9-6, a divide that closely resembles the split between agribusiness and independent representation on the board, highlighted in Cornucopia’s analysis of NOSB member votes over the past several years.

Motions to remove tragacanth gum, gellan gum, sulfurous acid, sodium carbonate peroxyhydrate, aqueous potassium silicate, and ferric phosphate all failed. Sherry and marsala wine were unanimously voted to be removed from the National List based on *lack of essentiality*, meaning organic versions of these wines are now commercially available.

By the end of the meeting it was clear, as Cornucopia had predicted, that it will be much harder to take materials off the list as a result of the new sunset process.

For example, synthetic aqueous potassium silicate would have been removed from the National List (that is, allowed to sunset) under the former, long-established sunset policy, which required a super-majority of the board to renew use of a synthetic/non-organic substance. Now, aqueous potassium silicate remains on the National List.

To the majority of those sitting in the audience, it was obvious that many board members were wrestling with the implications of the sunset changes, made by the NOP without notice or public comment on rule-making procedures. The Cornucopia Institute and a few other organizations are working on a legal challenge to reverse those changes. No doubt we will be supported by many members of the organic community, including citizens, other NGOs, and even the principal authors of the Organic Foods Production Act in the House and Senate. ☺

Mixed Bag: FDA Releases Revised Food Safety Rules

Public Comments Due December 15, Extension Requested

BY WILL FANTLE

Reacting to the intense blowback the FDA received from farmers and consumers last year over its proposed food safety rules for produce, the agency has released a new draft that addresses many of the objections. Public comments are due by December 15 on the draft rules. The Cornucopia Institute, working with other groups, has requested a 90-day extension to allow for fuller and careful analysis of the latest proposal.

One welcome change moves the rules into alignment with National Organic Program standards governing the use of raw manure as a fertility agent—this is a big win for organic farmers.

The draft also calls for establishment of a study committee to further assess the science and risks posed by manure usage. Comments to the FDA need to support this approach, as the changes are being vigorously opposed by some consumer groups, including the Center for Science in the Public Interest, which considers manure a “highly risky agricultural input.”

One hard-won gain by farmers with the original passage of the Food Safety Modernization Act (FSMA) by Congress was the Tester-Hagan Amendment. This amendment exempted small-scale, direct-marketing farmers and facilities from some of the new requirements imposed under FSMA. These provisions are vital for protecting vulnerable, small-scale producers that are providing safe, healthy food for their local communities. But the new draft rules **fail** to fulfill the intent of the amendment.

The proposed rules **fail** to provide due process for producers before revoking their Tester-Hagan exemption. The proposed rules **still** impose



The new draft rules continue to subject small-scale and direct-market producers, such as CSAs and farmers market vendors, to costly requirements that could potentially shut them down.

unnecessary and hasty deadlines for compliance that will effectively shut down any producer whose exemption is revoked.

And they **still** base the size requirements for qualifying for the Tester-Hagan exemption (established by Congress as \$500,000 in annual sales) on *all the food sold by the producer*—not just the produce subject to the agency’s jurisdiction or regulated under FSMA. A grass-fed beef producer, for example, with a small orchard who sells \$600,000 in beef and \$30,000 in fruit would be subject to all of the new costly FSMA requirements for growing and harvesting produce, even though the FDA and FSMA do not regulate beef.

The proposed rules also continue to propose usage of an inappropriate recreational water standard for the regular safety testing of irrigation water used on a farm. The costs are

excessive, frequent, and fail to identify harmful pathogens.

According to the National Sustainable Agriculture Coalition, growers with sales up to \$500,000 would likely spend 4% to 6% of their gross revenue to comply with the new rules. For small farms, FSMA could consume more than half of their modest profits.

For ideas on what you can do to help protect our nation’s safest and best farmers, visit Cornucopia’s website, sign up for our free enewsletter there, and join the online discussion on our Facebook page. ☺

For more information, check out the Food Safety link under the “Projects” tab at www.cornucopia.org



Big Food Spends Wildly to Defeat GMO Initiatives

Squeaky Close in Oregon, Historic Wins in Maui and Humboldt County

BY JASON COLE

For the third year in a row, backers of labeling genetically engineered food appear to have suffered an excruciatingly narrow loss at the state-level.

This year it was voters in Oregon that sent a labeling initiative down to defeat, this time by fewer than 5,000 votes out of 1.47 million cast (50.2% to 49.8%). Supporters of the measure still held out hope in the days following the election as ballots continued to trickle in and the 5,000 vote margin continued to narrow. A mandatory recount would be triggered if the gap were to close to under 3,000 votes.

A similar measure in Colorado, Proposition 105, lost by a 2:1 margin. Labeling proponents largely directed their resources towards Oregon, where they spent over \$9 million, compared to less than \$1 million in Colorado.

Meanwhile, in Hawaii, big agribusiness was dealt a defeat. Voters on the island of Maui passed a measure that temporarily bans genetically engineered crops unless they are proven safe. According to *Honolulu Civil Beat* reporters, opponents of the measure outspent advocates more than 87 to 1.

Immediately after the vote, Mon-

santo and Dow filed a lawsuit to invalidate the new law on the grounds that state and federal law permit cultivation of GMO crops and take precedence. The chemical giants successfully invalidated a law passed by voters in Kauai, another of the Hawaiian Islands, on the same basis earlier this year.

Humboldt County, California, also passed a ban on GE crops with more than 59% of the vote. Measure P prohibits the “propagation, cultivation, raising, or growing of genetically modified organisms” in that Northern California county.

The apparent loss in Oregon comes on the heels of losses in California (Prop 37 in 2012) and Washington (Initiative 522 in 2013), both by 51% to 49% margins, and this campaign followed a similar playbook. Again, pro-labeling forces were dramatically outspent, \$33 million to \$10 million. Many of the same contributors that financed the California and Washington votes returned for this round.

For the pro-labeling side, Dr. Bronner’s, Mercola.com, and the Center for Food Safety each gave over \$1 million, while thousands of individual donors gave under \$100 each.

The anti-labeling side was led by Monsanto (\$10.7 million), DuPont

(\$7.5 million), PepsiCo (\$4 million), and Coca-Cola (\$2.5 million), along with the powerful industry lobby group, the Grocery Manufacturers Association (GMA), which contributed \$250,000. As in past campaigns, donations from individual citizens were nearly non-existent on the anti-labeling side.

Large food corporations, in conjunction with their agribusiness allies, have now scored three narrow victories in as many years while spending close to \$100 million overall. Many of these corporations — including Kellogg’s (Kashi), General Mills (Cascadian Farms and Muir Glen), and Smucker’s (Santa Cruz Organic and R.W. Knudsen) — own natural and organic brands popular among supporters of labeling. ☺

Cornucopia News

Policy Analyst **Pamela Coleman**, PhD, has taken a position, returning to certification work, with NOFA—New York (Northeast Organic Farming Association). Cornucopia wishes to thank Dr. Coleman for her excellent work and lasting contribution to the organization. We wish her all the best in this new life chapter.

Applications for the open position are still being accepted—but not for long! For a full job description, click the “Jobs” link at the bottom of the home page (www.cornucopia.org).

Are you interested in a 2015 internship with Cornucopia? We are looking for organic champions passionate about the good food movement who have skills in writing, research and/or graphic design. For more information, click “Internships” at the bottom of the home page.

The infographic is titled "Measure 92 & Prop 105: Your right to know." and is divided into two main sections: "CORPORATE AGRIBUSINESS FIGHTING MEASURE 92 AND PROP 105" and "ORGANIC LEADERS SUPPORTING MEASURE 92 AND PROP 105". The central graphic features a scale of justice with a plant growing from the base, symbolizing the fight for transparency. The infographic lists numerous companies and organizations, including Monsanto, DuPont, Kellogg's, and General Mills on the agribusiness side, and Dr. Bronner's, Mercola.com, and the Center for Food Safety on the organic side. It also includes a section for "THE INTERNATIONAL BAPTIST ASSOCIATION (IBA) IS FIGHTING STATE AND LABELING MEASURES IN THE USA BECAUSE..." and "NEW SUPPORTERS".

Find out which companies support your right to know with Cornucopia's infographics. Scroll down the right side of the home page at www.cornucopia.org





THE CORNUCOPIA FARMER PROFILE

Tribally Supported Agriculture

BY MELODY MORRELL

It is likely you have heard of Community Supported Agriculture (CSA), but how about Tribally Supported Agriculture (TSA)? The Shakopee Mdewakanton Sioux Community (SMSC) in Minnesota started planting their Wozupi (“garden” in Dakotah) in 2010, providing certified organic, locally grown whole foods to the surrounding community using fair labor practices and environmentally sustainable methods.

Today, there are 12 acres under cultivation, providing heirloom and tribally significant crops including vegetables, herbs, and fruit through their TSA, farmers market, and natural food market, Mazopiya. Bees, goats, and chickens thrive, and maple sap becomes syrup.

“Wozupi is seen as a community service,” says Director Rebecca Yoshino. The gardens provide produce at deep discounts to the tribe’s casino restaurants and all community-operated departments (Educare, Education, Health and Wellness, and Mazopiya). They donate TSA shares to Scott County Native American families identified by SMSC’s Family and Children Services department, and make weekly donations to the local food shelf. A prescription fruit and vegetable program is also being discussed.

Every aspect of Wozupi feeds the community. Angora goats are bred for their fiber, which will be used in fiber arts classes, and the animals’ personable demeanor enhances the experience children and adults have when they visit the farm. Wozupi hopes to work with the SMSC behavioral health department to incorporate animal therapy work with their clients. Wozupi offers affordable community education classes on many topics, including animal husbandry, maple syruping, food preservation, and seed saving. Each spring their plant sale distributes thousands of organic vegetable, fruit, and herb seedlings into the gardens of community members.

Wozupi has had a major impact on the many children who help tend the garden from seed to plate. Children return every year—some have attended for five years—and enjoy eating whatever they grow. Wozupi has also worked with area schools, helping to establish small fruit orchards and to tap sugar maple trees in the spring.

Yoshino notes, “We are trying to establish a healthy foundation for these children with a tangible relationship to where their food comes from.” Yoshino grew up on a biodynamic organic farm in Upstate New York, attended

a Waldorf high school, interned on a biodynamic farm, and has worked in the field for much of her life.

Sean Sherman, “The Sioux Chef,” is also working with Wozupi to get the produce he needs to create his signature Lakota and Ojibway cuisine. His catering company and soon-to-be-open restaurant in Minneapolis focus on

introducing historic foods into the modern diet. The “indigenized diet” is the original local and seasonal way to eat.

Wozupi is dedicated to cultivating indigenous seeds and foods, working with the Minnesota Science Museum and Dream of Wild Health and their seed collections for training, data collection, and seed distribution. They have formed the Indigenous Seed Keepers Alliance (ISKA), working locally within the indigenous community on seeds, gardening, food, nutritional analysis, and seed-keeping trainings. ISKA is building a network of skilled individuals helping to preserve indigenous seed collections and bring them from seed to table.

ISKA’s seeds are not for sale yet, but have been given to Native organizations and distributed through seed swaps or giveaways at conferences and trainings. The seed packets read: “Opening this seed packet is an agreement that these seeds and any plants they produce will not be used for commercial breeding purposes with any patent outcome, nor will these seeds be manipulated to create and/or promote the production of genetically modified organisms.”

White Earth Land Recovery Project was recently awarded a three-year grant, funding the newly established Upper Midwest Indigenous Seed Keepers Network. Thirteen Native communities, including SMSC, have come together in the Network to develop inter-tribal seed saving, data collection, and distribution capacities. In a time when GMO seed and corporate agriculture threaten food sovereignty, this important work ensures that indigenous seeds and foods are preserved for the future. ☺



Photo courtesy of Wozupi Tribal Gardens

Wozupi has 12 acres under organic cultivation



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FDA Revises Food Safety Rules



DalierPhotoClub.com

Reacting to blowback from farmers and consumers last year, the FDA has revised its proposed food safety rules for produce. Despite some improvements, the new draft rule still subjects small-scale and direct-market growers to costly requirements. Some estimates suggest farmers with sales up to \$500,000 could spend as much as 6% of revenue to comply with the new rules. Public comments are due by December 15. (See story on page 9.)

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The Care & Feeding of Watchdogs

Did you know that individual Cornucopia members provide the largest share of the organization's funding? In fact, donations from members like you account for 50% of Cornucopia's annual budget! That's a lot when you consider that many nonprofits rely almost exclusively on foundation and/or government grants.

Another 30% of Cornucopia's funding comes from private and family foundations, and about 20% from organic businesses, including dozens of member-owned cooperative grocers. Cornucopia receives *no* federal or state funding — as in nada, zip, zero. We are a corporate/government watchdog, not a lapdog.

So won't you please throw your trusty organic watchdog a treat this holiday season? (Maybe a T-bone, if you can afford it!) There's a donation envelope inside this issue, or you can give online at www.cornucopia.org. Your support keeps Cornucopia independent, and together we can protect the integrity of the organic label and the authenticity of our food!



Our intrepid Board president, Helen Kees, checking on Cornucopia's mail. A fourth-generation farmer, Helen and her family own Wheatfield Hill Organics, near Durand, Wis.

—ELIZABETH WOLF