

THE CULTIVATOR

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Where the Rubber Meets the Road

Identifying the Trustworthy Certifiers

BY LINLEY DIXON, PhD; ANNE ROSS, JD; AND MARIE BURCHAM, JD

Certifying Agents (ACAs), also known as “certifiers,” are agents of the USDA’s National Organic Program and occupy one of the most important roles in organics.

Farmers, processors, and handlers hire ACAs to ensure that their practices comply with organic regulations. Certification is a legal requirement under federal law for commodities or food products to be labeled “organic.”

Because certifiers often exercise discretion in applying organic regulations, their credibility and commitment to organic principles is crucial in maintaining organic authenticity and trust in the organic label.

Every decision certifiers make cumulatively determines the working definition of organics and whether this definition embodies the spirit and letter of the law, or simply caters to corporations who want to use the organic label for marketing purposes.

Certifiers are chosen from the USDA’s accredited list and establish their own fee schedules—either a flat rate or a sliding fee based on gross income. While sliding fees may make it more affordable for smaller operations to certify, they also create an economic incentive to certify industrial-scale operations.

While many producers choose the cheapest option, some are now



choosing certifiers based on their practices. Some producers have always “shopped” for a certifier with lax or accommodating approaches.

Others are becoming aware that some certifiers, fast and loose with enforcement, are hurting their bottom lines and the reputation of the organic label.

One step removed, consumers are nonetheless invested in the credibility of certifiers. Just as producers have an option when it comes to choosing certifiers, consumers can also look at product packaging for the highest-integrity certifiers (listed on all packaged organic products).

The willingness to certify hydroponics (soil-less growing), large confinement/feedlot dairies in desert conditions, and small porches instead of outdoor access for poultry has been most controversial. These issues strike at the heart of a certifier’s commitment to organic

regulations and foundational principles.

In 2005, without public notice or opportunity for comment, the USDA unilaterally began allowing the certification of soil-less hydroponic operations, bypassing, as required by law, the National Organic Standards Board (NOSB).

Yet to this day, the NOSB has never voted to allow hydroponics or established production practices. Some ACAs have been certifying

CERTIFIERS continued on page 8

INSIDE THIS ISSUE

- Hydroponics 2
- Livestock Standards 4
- Co-opting Organic 5
- Dairy Industry & Report 6
- Industrializing Organic Grain 9
- Cornucopia’s New Associate Director . . . 11
- Community Supported Agriculture 12

Illegal Organic Hydroponic Certification Continues

Without NOSB Approval or Standards

BY LINLEY DIXON, PhD

In an affront to the farming pioneers who launched the organic movement, today a \$50 billion industry, the USDA announced in late January that “certification of hydroponic, aquaponic, and aeroponic operations is allowed under the USDA organic regulations, and has been since the National Organic Program (NOP) began.”

Much hydroponic production takes place in industrial-scale greenhouses using liquid fertilizers, mostly produced from conventional, hydrolyzed soybeans. Hydroponic produce with the organic label is rapidly displacing fruit and vegetables grown in carefully nurtured soil on diversified farms.

The present federal organic regulations and their enabling legislation, the Organic Foods

Production Act (OFPA), require stewardship of soil fertility as a prerequisite for organic certification.

The founders within the organic farming community contend that cheaper production techniques, employed by hydroponic growers in Mexico, Canada, and Europe, are crushing legitimate soil-based farmers in the U.S. Hydroponic produce cannot be legally labeled as “organic” around the world, yet it can be exported to the United States and labeled organic here.

Further, the U.S. has no legal requirement for conventional or organic produce to be labeled as grown hydroponically, so consumers are likely unaware that the production methods and nutrient levels of the fruits and vegetables they are purchasing have radically changed.

Despite the USDA’s claim that hydroponic production has always

been approved as part of organics, the National Organic Standards Board (NOSB), the governing body that the USDA Secretary is required by Congress to consult on all organic rulemaking, has never voted to legalize soil-less production.

Cornucopia has obtained numerous internal and external emails exchanged between NOP staff and certifiers expressing their understanding that soil-based production is required. These documents were procured through a Freedom of Information Act request and are dated as recently as 2016.

The NOP has unilaterally, and in secret, allowed the certification of soil-less systems without standards, public notice, or opportunity for public comment.

In 2005, amid USDA silence on this issue, a few organic accredited

Continued on page 3

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CONTACT US

P.O. Box 126
Cornucopia, WI 54827
608-625-2000
cultivate@cornucopia.org

STAFF

Mark Kastel, Codirector & Senior Farm Policy Analyst

Will Fantle, Codirector & Director of Research

Daniel Doyle, Associate Director & Chief Operating Officer

Linley Dixon, PhD, Senior Scientist

Marie Burcham, JD, Farm & Food Policy Analyst

Anne Ross, JD, Farm & Food Policy Analyst

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certifying agents (ACAs) quietly began to certify hydroponic production systems, catering to corporate agribusiness. CCOF, the largest certifier in the country, has become the predominant certifier of hydroponic operations.

Miles McEvoy, the NOP director responsible for this stealthy approval of hydroponic production, resigned from his position in September 2017 under an ethical cloud.

He has recently resurfaced as an official representative of CCOF and has been a speaker at prominent industry conferences focusing on large-scale organic production, including hydroponics.

Since the USDA released its official statement on soil-less production in January, there has been an outpouring of opposition from the organic farming community.

Cornucopia has received a flurry of inquiries from organic farmers surrounding the statement, some of which called it an “outright lie,” while others referred to it as “a rewriting of history.”

Following the announcement, Cornucopia sent a formal request to the USDA’s Office of Inspector General, asking them to investigate whether officials within the agency willfully attempted to misinform the public.

Fortunately, several prominent ACAs have never allowed the certification of soil-less systems, based on their straightforward interpretation of current regulatory standards and the fact that the NOSB has never formally made recommendations for how these soil-less systems might operate within the law.

These certifiers include OneCert, Vermont Organic Farmers, Maine



Present organic regulations governing certification require careful stewardship of soil fertility, not met by hydroponics.

Organic Farming and Gardening Association, Organic Crop Improvement Association, and Ohio Ecological Food and Farming Association.

FOIA documents indicate that, as of 2016, 41 ACAs had responded to a survey stating that they do not certify hydroponics, while only 18 ACAs said that they do.

Sam Welsch, the president of OneCert, responded to NOP’s notice stating, “There are two parts to the NOP’s lie. The first is that hydroponic operations are allowed by the regulations. The second is when that was allowed. The certification of hydroponics was not even considered an option until September 2006 when the NOP sent certifiers a survey on the topic.”

The Cornucopia Institute currently has their legal team researching the filing of a federal lawsuit challenging the agency. The farmer outcry in response to the NOP’s position signals that many certified organic growers do not believe that soil-less systems meet the organic standards.

“The USDA’s crude rewriting of history is in keeping with the

Trump administration’s attitude towards reality. They seem to believe that if they say something loud enough, we will all believe it,” said Dave Chapman, a 40-year organic farming veteran who has been working to raise awareness around the corporate-hydroponic takeover of organics.

He continued, “The clumsiness of this fake news reveals the current NOP’s disconnect from the organic community.

They seem intent on pushing away the very people they were created to serve.”

Whether producing meat, milk, eggs, or produce, many certified organic farmers are becoming aware of the fact that the certifiers they employ are ultimately hurting their bottom line when they certify operations that skirt organic standards, regardless of what the NOP permits.

“More and more growers are recognizing that they are being placed at a competitive disadvantage by the very certifiers who we have been paying thousands of dollars to, over decades, assuming they were defending the integrity of organic production,” said Tom Beddard of Lady Moon Farms, the largest organic grower east of the Mississippi, with farms in Pennsylvania, Georgia, and Florida.

It’s now more important than ever that organic consumers do their homework to ensure they purchase the safest, most nutrient-dense food for their families. The Cornucopia Institute’s mobile-friendly scorecards help shoppers reward the true heroes in the organic movement.

USDA Pulling Back Proposed Livestock Standards

Discounting the Advice of the NOSB and Massive Public Support

BY MARIE BURCHAM, JD

The United States Department of Agriculture (USDA) recently announced its intent to withdraw the proposed Organic Livestock and Poultry Practices Rule (OLPP) from the National Organic Program (NOP).

This move comes after successive delays to implement the rule since President Trump took office. Massive public comment favored the proposed rule, in part because it would make the organic livestock standards easier to enforce uniformly.

If implemented, the OLPP would have required a set amount of outdoor and indoor space for poultry and improved management practices for all species of livestock under the organic label.

Most importantly, the OLPP would close a loophole allowing some factory farms to use small, screened-in porches as “outdoor access” for laying hens.

Right now, certified organic “factory farms” confine as many as 200,000 birds in a single building. Keeping hens in these industrial settings is synonymous with the use of porches—often a strip of fenced-in concrete or gravel running alongside the main structure that only a few birds can access through small pop-holes in the sides of the barns.

By the USDA’s own account, they received over 47,000 comments when the agency asked whether they should implement, delay, suspend, or withdraw the OLPP. Over 40,000 of commenters supported the option to implement the OLPP as planned.

In striking contrast, only 28



The new rule would have required improved management practices for all species of livestock under the organic label.

commenters, presumably representing corporate lobbying interests, supported the option to withdraw the rule.

The USDA has justified withdrawal of the rule, in part, based on their incorrect conclusion that the current growth in the organic egg market is evidence of consumer confidence in the label.

Instead, this rapid growth indicates that industrial-organic egg producers who use the controversial porches are flooding the market with cheap eggs, undercutting the prices paid to family farmers. Most consumers who buy organic eggs are unaware of the deception.

Cornucopia’s position is that the USDA is withdrawing the OLPP based on an incorrect legal interpretation of the Organic Foods Production Act (OFPA), the law passed by Congress charging the agency with overseeing organic farming and food production.

The agency suggested that the proposed regulations were an overreach and burdensome (implying that livestock living conditions do not have an impact on their health).

Despite the organic industry asking for strict regulation and enforcement, the foundation for maintaining consumer trust, the Trump administration’s elimination of regulations is in play.

OFPA mandated that the Secretary seek the advice of the National Organic Standards Board (NOSB). For over ten years, the NOSB has done just that on livestock issues.

In 2002, the NOSB made recommendations prohibiting the use of “porches” for outdoor access in organic poultry

operations. Between 2009 and 2011, the NOSB issued further recommendations on animal welfare. Throughout, the NOSB reiterated that true outdoor access is a basic tenet of organic production.

To withdraw the rule at this point undermines the power of the NOSB and the voices of industry stakeholders that originally helped shape organic livestock regulations. Apparently, the current USDA is more interested in satisfying agribusiness lobbyists.

Even if the USDA is unwilling to listen to consumers and the majority of organic stakeholders, we are not without our own power. Consumers can still shop for eggs produced with ethical practices.

The Cornucopia Institute’s Organic Egg Scorecard can guide you to the most ethically produced eggs, while simultaneously protecting farmers who truly practice humane animal husbandry.

You can access the scorecard from your phone or computer under the *Scorecards* tab on our website: cornucopia.org.

“Fauxganic” Takeover in Full Swing

Finding and Protecting *Real Organic* Food Going Forward

BY LINLEY DIXON, PhD

“Farmstead,” “local,” “sustainable,” “artisanal,” “family-farmed,” “free-range,” “grass-fed,” even “CSA”... Every time people in the good food movement come up with words to market their superior products, corporate agribusinesses start using the same language!

One word we all thought would be safe from Big Ag’s routine co-opting is “organic,” because it is protected by federal law.

The humble beginnings of what is now a \$50 billion industry lie in small, diversified family farms. In the 1980s, many pioneering organic farmers lobbied the government to harmonize the variable organic standards that had resulted from a hodgepodge of private certifiers.

At the time, many in the organic movement were skeptical of the government’s loyalty to organic integrity over agribusiness interests. Conversely, conventional farmers lobbied against the label out of fear that it would make their chemical-intensive practices look bad.

Nevertheless, the creation of the USDA National Organic Program (NOP) was thought to be a big win for the family farmers that led the movement. Recent events have, unfortunately, vindicated the original skepticism of the USDA’s commitment to protect the real organic farmer.

Now, as more industrial operations gain organic status, the skeptics’ fears of government caving to agribusiness are being realized faster than ever.

Though agribusiness interests have had some influence on the NOP

PHOTO BY: THE CORNUCOPIA INSTITUTE



The Country Hen is one example of a certified organic industrial-style egg producer. Their porches, shown here, are approved as “outdoor access” by their certifier and the USDA’s NOP.

from the beginning, the current situation has caused pioneering farmers to pick up their broad forks and fight back.

The certification of soil-less operations was a tipping point for many farmers, although poultry porches, CAFO dairies, and documented fraud at U.S. borders have all added fuel to the fire.

A complacent NOP has nearly crippled ethical organic farmers and certifiers. Without enforcement behind the regulations, “organic” has begun to lose its status as the gold standard of food labels.

Thousands of legitimate organic farmers still depend on the organic label for their financial success—the same label that continues to inexplicably grace fraudulent products and imports.

Authentic organic farms are facing a real crisis as wholesale prices for organic grain, produce, milk, meat, eggs, and fruit drop below economic sustainability.

If you’re not a farmer, but an eater, this is your fight as well.

None of us are going to go back to eating conventional food with its well-documented environmental, human health, and animal welfare consequences.

So then, how will authentic organic farmers differentiate their superior practices from industrial, monoculture, and CAFO operations, now operating under the same label?

Some local farmers have abandoned the organic label altogether, choosing to rely on direct-marketing, where transparency is greatest.

Others are contemplating a number of “add-on” labeling ideas that would depend on varying degrees of independent oversight, including “Regenerative Organic,” “100% Grass-Fed,” and “The Real Organic Project.”

Pioneering organic farmer Eliot Coleman summed up the situation, “I just see no way that organic can be rescued from such competently done and well-funded industrial thievery unless we have the energy to start all over again, and I see that as a daunting task.”

Cornucopia Board President and Organic Valley beef producer, Helen Kees, reacted to the crisis, “I’m a farmer; I’m used to curve balls. I have no choice but to fight back.”

In the meantime, as the fight for the true meaning of organic plays out, consumers and farmers are joining together to differentiate the “two organic labels.”

Please consult Cornucopia’s organic brand scorecards and buyers’ guides to identify the very best food for your families, and vote with your forks on the side of organic integrity.

“Factory-Farm” Takeover of Organic Milk

New Scorecard Enables Defrauded Consumers to Identify Legitimate Brands

BY WILL FANTLE

When commercialized in the 1980s, the organic dairy movement was viewed by many farmers as opting out of a rapacious agricultural marketing system that had driven well over half of dairy farm families off the land over the preceding two decades.

Now, a quarter century later, history is repeating itself with giant “factory farms” flooding the organic dairy market with fraudulent “organic” milk, economically devastating family businesses and rural communities.

According to the latest USDA records, organic milk production jumped 18.5% in 2016 alone, far eclipsing the growth in market demand. As a result, wholesale purchasers of raw organic milk have cut prices to farmers by 25-30%, or more.

In addition, some buyers have set quotas mandating production cuts, further impacting cash flow on the farm. The largest organic dairy brand, Horizon, owned by Groupe Danone of France, is terminating contracts with some farmers at a time when there are no alternative markets available. Industry experts have called the moves by the world’s largest dairy a “death warrant” for farmers.

With the glut of organic milk, and the USDA abdicating their legally mandated oversight responsibilities, authentic organic farmers and their customers are poised to band together to take their fight to the dairy coolers of the nation’s groceries and specialty retailers.



Wholesale purchasers of raw organic milk have cut prices to farmers by 25-30%.

The Cornucopia Institute has just released a comprehensive history and study of the industry, exposing how factory farms, some milking as many as 15,000 cows in desert-like conditions in the Southwest, are defrauding consumers by depriving them of the documented nutritional superiority in pasture-based organic dairy production.

The report includes a companion Organic Dairy Scorecard rating approximately 160 brands in terms of their authenticity and quality of production.

“With the USDA’s failure to protect ethical industry participants and consumers from outright fraud, using our organic dairy scorecard is a way for organic stakeholders to take the law into their own hands,” said Mark A. Kastel, Codirector and Senior Farm Policy Analyst at Cornucopia. “In every market and product category, consumers can vote in front of the dairy case to economically support authentic organic farmers while simultaneously protecting their families.”

With the support of a growing legion of consumers looking for safer and more nutritionally dense food, the organic industry has grown into a \$50 billion juggernaut.

No longer do consumers have to go out of their way to buy organic produce, dairy products, and processed foods at specialty retailers like Whole Foods or the nation’s 300 member-owned natural food cooperatives.

Costco is now the largest organic retailer in the country, with Walmart, Target, Kroger, and many more of the country’s major food retailers rapidly expanding their organic offerings.

The Dairy Scorecard rates brands in terms of their procurement practices, separating major industry players, like the private-label milk brands at big-box retailers that exclusively source from mega-dairies, from the many smaller, family-owned operations where cows often have names, not numbers.

“Unlike the industrial dairies, true organic farmers concentrate on soil fertility and nutrient-superior milk production from fresh pasture and end up with cows that live long and healthy lives in comparison to ‘organic’ industrial dairies that are so similar to the inhumane and ecologically damaging conventional factory farms consumers condemn,” said Ed Maltby, a longtime industry observer and executive director of the Northeast Organic Dairy Producers Alliance.

True organic, pasture-based production produces milk with higher levels of omega-3 fatty acids and beneficial antioxidants. Testing

Continued on page 7

done as part of an investigative report in 2017 by *The Washington Post* found milk from Aurora Organic Dairy, the industry's largest supplier to grocery chains like Costco, Safeway, and Walmart, was nutritionally deficient compared to organic family-scale production.

"Consumers are being ripped off. My family and I have dedicated ourselves, as have the majority of the over 2,000 organic dairy farmers in this country, to creating a superior product in terms of both flavor and nutrition," said Kevin Engelbert, the first certified organic dairy farmer in the country in the 1980s. "The inaction by the USDA in enforcing the law is depriving consumers of the healthful benefits they are seeking and competitively damaging ethical farmers."

Engelbert, who farms in Nichols, New York, was appointed by the Secretary of Agriculture during the Bush administration to serve on the USDA's National Organic Standards Board (NOSB), charged by Congress to review and recommend regulations protecting organics farmers and their customers.

"Nonprofit, public-interest groups like Cornucopia should not have to go to the expense of researching comparative brands that are and are not meeting the organic standards. That's supposed to be the job of the USDA and, through successive Democratic and Republican administrations, they have woefully failed in their responsibilities," Engelbert added.

To illustrate the grotesquely disproportionate scale of some of these organic dairies operating in the semi-desert conditions of Texas, Idaho, Colorado, and California, Texas alone produces 1.4 times more organic milk than Wisconsin, the state with the most organic dairies—even though Wisconsin, commonly known as *America's Dairyland*, has 75 times more organic producers (453 versus six, according to the most recent USDA data).

A decade ago, federal investigators found Aurora in "willful" violation of 14 tenets of the organic law. After career civil servants recommended they be banned from organic commerce, Aurora was allowed to continue to

operate without paying a fine by the Bush USDA.

Cornucopia's Kastel added, "After the Bush years, we didn't think things could get any worse, but the Obama administration appointed organic industry insiders who sold out the values the movement was founded upon in deference to short-term corporate profit." He continued, "When the last administration took over, they proclaimed it the 'age of enforcement,' but, if anything, the system became even more gamed in favor of corporate agribusiness and their lobbyists at the Organic Trade Association."

DAIRY continued on page 10

PHOTO BY: THE CORNUCOPIA INSTITUTE



PHOTO BY: THE CORNUCOPIA INSTITUTE



ABOVE: Although grazing is required by law, the USDA says both of these operations are "organic." One hundred percent of the cows are on pasture at Art Thicke's beautiful farm in Minnesota overlooking the Mississippi River. Almost all cows are confined on one of Aurora's Texas feedlot dairies.

CERTIFIERS continued from page 1

hydroponic systems because of the corporate-friendly USDA posture, while others have decided not to, based on the clear language in the law requiring “improving and maintaining soil fertility” as a prerequisite.

Soil high in organic matter holds water, cycles farm nutrients, reduces nutrient run-off, enhances the flavor and nutrition of organic produce, is high in biodiversity, and sequesters carbon.

Organic farmers have always understood that healthy soil makes healthy plants and healthy people. Fostering soil fertility is an organic producer’s primary job.

The requirement to grow in fertile soil is the last thing that the founders of the organic movement thought they would be fighting to enforce.

The best certifiers, including OneCert, NOFA, OEFFA, MOFGA, OCIA, and VOF are following the spirit and letter of the law by refusing to certify hydroponics systems.

In addition to a commitment to soil health and all of its associated

benefits, these certifiers are also paying attention to animal welfare.

Under the USDA’s organic requirements, “all” livestock “must” have “outdoor access,” where animals get direct sunlight, fresh air, shelter and shade, and clean drinking water.

However, many organic egg producers do not provide hens with access to legitimate outdoor space at all, or even sunlight, in windowless buildings holding as many as 200,000 birds each.

Industrial-scale producers managed to convince the USDA to substitute small porches—commonly with concrete floors—in place of legitimate outdoor access requirements.

In organic dairy production, operations with thousands of cows in the desert West are somehow meeting grazing requirements on ridiculously small acreages. In addition, industrial dairies are allowed to buy conventionally raised replacement heifers, sometimes raised with antibiotics, and “convert” them to organic on an ongoing basis.

These practices place legitimate organic dairy farmers, who provide ample pasture and raise their own organic replacement animals from birth, at an extreme economic disadvantage.

And because of poor enforcement, industrial “organics” has grown and invested hundreds of millions of dollars in infrastructure.

Although the USDA has done nothing to stamp out abuses in produce or livestock production, some of the best certifiers have stepped in on their own to make a difference.

Cornucopia is preparing a report that includes information about certifiers’ practices related to these issues, inspector qualifications, and producer support services, and more.

Our report will include a buyer’s guide empowering family-scale farmers, the backbone of the organic industry, to choose certifiers who share their values. The buyer’s guide will help consumers separate the organic wheat from the chaff.

A Buyer’s Guide to Authentic Organic Grain

Cornucopia showcases some of the real heroes in organics in our soon-to-be-released Organic Grain Buyer’s Guide. This new consumer tool showcases the ethical industry participants, identifying the organic feed operations and producers that only use North American-grown organic grain in producing feed or for the livestock they raise.

In addition to highlighting organic feed suppliers, the guide also identifies brand name organic milk, meat, and dairy operations that do not use imported organic grain.

Over the past few years, as imports of organic grains have soared, growing doubts over whether these grain imports are legitimate have surfaced. The concerns were realized when massive shipments of fraudulent organic corn and soybeans were documented in 2017 at U.S. borders.

Cornucopia’s guide also provides organic producers and consumers with background information to understand the context in which heroes have emerged, while cheaper, fraudulently labeled “organic” corn has been allowed to cross U.S. borders.

With this information, organic producers and consumers can exercise their purchasing power in a way that stands for something—supporting high-integrity feed operations and North American organic grain farmers—while simultaneously depreciating fraudulent practices.

In light of the documented cases of import fraud, the choices made by organic feed operations, producers, and consumers can be a powerful force in driving changes in the marketplace and, ultimately, in safeguarding organic integrity.



Conventional Models Meet Organic Practices

Preserving Family-scale Grain Farming

BY ANNE ROSS, JD

Over the past few years, imports of organic corn, soybeans, and other grain have soared, an escalation attributed to shortfalls in domestic production.

The majority of imported organic corn and soybeans are used for livestock feed. Amid concerns in recent years about the authenticity of imported organic grain, coupled with domestic farmers being squeezed out of the market, conventional approaches to “organic” grain production have emerged.

Enter Pipeline Foods, LLC. Pipeline identifies itself as the first U.S.-based global supply chain solutions company focused exclusively on non-GMO and organic food and feed.

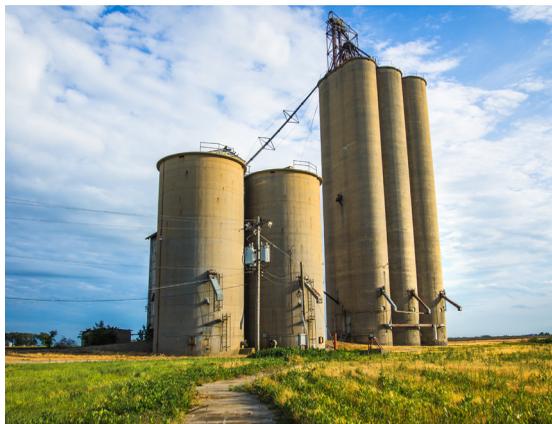
The company has acquired feed elevators, is building a state-of-the-art grain terminal in North Dakota, and plans to invest an additional \$300-\$500 million in its plan to build organic supply chains.

As consumer demand for organic food grows, similar corporate models that vertically integrate all stages of production and distribution under centralized management will emerge.

Pipeline contends that consolidating grain processing and distribution using this model of control creates a more sustainable organic supply chain.

This integrated model is reflective of the experience in the conventional marketplace that has crushed family-scale farmers.

Are large-scale production and integration models inherently incompatible with the ecological and social values on which organic agriculture was founded?



The majority of imported organic corn and soybeans are used for livestock feed.

Will smaller organic producers who gave life to the organic movement also be squeezed out by corporate, organic agribusiness with centralized control over distribution channels?

USDA organic standards clearly include ecological values like biodiversity, soil fertility, and crop rotation. And the social and ethical values essential for sustainability have traditionally been championed by the organic farmer, unmotivated by corporate investments.

Larger-scale integrated models impose increasing competitive pressure on the family-scale farm infrastructure of organic production.

Independent producers find it difficult to compete with corporate-owned brands that can achieve an economy of scale, have the money to invest in advertising, and initially subsidize price-cuts on organic products with sales from conventional sales.

Differences between the two organic styles, corporate profit-centered producers and the local family-scale farmers that market cooperatively, become even more distinct as more integrated corporate business models emerge.

Merle Kramer, organic grain marketer for Midwest Organic Farmers Cooperative, puts it this way, “There are two organic food systems, one rooted in original organic standards and local/regionally produced food and the other a conventional production model driven by oversupply (including fraudulent organic grain from overseas), consolidation, and subverting organic standards.”

Defenders of organics must consider how conventional models in organic food production ultimately affect the principles on which the organic movement was based and how these values can be safeguarded.

Consolidation of supply chains leaves organic food production, just like conventional agriculture, in the hands of a corporate few and leaves foundational principles of organic food production, like ecology, social justice, and sustainability, vulnerable to material erosion.

When organic models of food distribution start to look more like their conventional counterparts, consumers should take heed and support their local organic food economy to prevent local farmers from being forced into integrated models or, worse yet, forced off the farm.

Consumer dollars exert marketplace pressure and ensure a family-scale farm infrastructure thrives. The educational materials Cornucopia provides are designed to help consumers make informed choices about authentic, organic options and provide consumers with a pipeline of their own. This pipeline is to local, authentic organic food, and the family-scale farmers who work tirelessly to produce it.

DAIRY continued from page 7

The Obama USDA dismissed evidence-filled complaints compiled by Cornucopia that employed aerial and satellite photography of the giant dairies confining their cattle to sheds or feedlots, instead of grazing.

After the heat was turned up by the *Post's* investigation, USDA staff visited Aurora's largest operation in Colorado, managing over 20,000 head of cattle. But they conveniently made an appointment prior to doing so.

"Who ever heard of a law enforcement agency calling up a suspected meth lab and setting up a mutually convenient appointment to carry out a search?" said Francis Thicke, a longtime certified organic dairy farmer from Fairfield, Iowa and a former Obama-era appointee to the NOSB.

"Between livestock factories producing 'organic' dairy, meat, and eggs, produce grown in hydroponic factories without the hallmark of organic, nutrients/soil stewardship, and imports of grains that have proven to be fraudulent, the USDA's gross lack of fulfilling their oversight and enforcement responsibilities is forcing consumers to do their own research," Kastel added.

Decades ago, Kastel and many other early organic movement proponents suggested switching to organic production, a style of agriculture shunning toxic agrichemicals, drugs, and genetic engineering, practicing rigorous environmental stewardship, and subscribing to a more humane animal husbandry model—an approach to farming and marketing

PHOTO BY: LAURIE SCHNEIDER



Many organic dairy farmers embrace the use of grazing as a major part of their cows' diets.

that, for the last quarter century, has allowed a humane scale of agriculture to economically survive.

"During the Nixon administration, Secretary of Agriculture Earl Butts' message to farmers was 'get big or get out,'" stated Kastel. "With margins being squeezed by giant industrial-scale dairies, most family farmers didn't really have a choice in the matter and were forced out of business."

Organics was viewed as a viable and economically sustainable alternative for family-scale dairy producers until the recent crash in farmgate milk prices.

If some industry observers were hoping the Trump administration would right the listing organic ship, they are likely already disappointed.

During Trump's relatively short tenure, the director of the USDA National Organic Program left under an ethical cloud, and the department has expressed their tacit approval for growing organic fruits and vegetables without soil in giant hydroponic greenhouses, scuttling a regulation just set to go into effect that would have forced factory-farm egg producers to

offer outdoor access to their birds (an existing legal requirement that continues to be skirted).

To aid marketplace research, Cornucopia has updated both its Organic Dairy Report and its Organic Dairy Scorecard.

When it was first published in 2006, the scorecard listed 68 brands. The update will feature information on over 160 certified

organic dairy brands. The products, both name brand and private-label (or "store-brand") options, are rated on the basis of a questionnaire, investigations, and data mining in federal and public records.

Regulators are under pressure from large agribusiness interests, leading to loose interpretations and lax enforcement of the organic standards. This trend has led to a market where the organic seal is displayed on dairy products representing a questionably wide range of production practices, despite uniform federal standards.

"There are businesses marketing milk that skirt organic regulations," says Marie Burcham, JD, Farm and Food Policy Analyst for Cornucopia and lead researcher on the dairy project. "These dairies harm the environment, compromise the nutritional content of organic dairy products, and sacrifice the well-being of livestock. Essentially, they echo the practices of the conventional livestock market."

Continued on page 11

“Of special importance,” states Burcham, “is the ability to differentiate these brands on the store shelf because not everyone can take the time to do the background research that is sometimes needed in our complex food market. The scorecard does just that—letting people know how brands rate on things like grass feeding, dedication to pasturing, how the calves are treated, and so much more.”

“The good news is that for every type of product, fluid milk, cheese, butter, ice cream, and more, consumers can have continued confidence in organic dairy foods by locating the most reputable brand on the Cornucopia Organic Brand Scorecard,” said Kastel. “Parents who have made the decision to switch to organic food, wanting to lower the toxic load and increase the nutritional value of the food they are serving their children, are not about to go back to conventional products. The scorecard allows the most important participants in the organic industry, consumers, to have the final say in this controversy.”

The Cornucopia Institute has also published scorecards empowering consumers and wholesale buyers to make discerning marketplace decisions in their purchases of eggs, soy foods, breakfast cereals, and other certified organic products.

The new Organic Dairy Scorecard is mobile-friendly, allowing users to check brand ratings while shopping. Find Cornucopia’s new Dairy Report and Scorecard on our website under the *Scorecards* tab.

THE INDUSTRIALIZATION OF ORGANIC DAIRY



Cornucopia’s Farmer Profile is on hiatus due to late, breaking news and will return in the next issue as we introduce you to Alfred and Carney Farris of Windy Acres Farm in Tennessee.

Cornucopia Welcomes New Associate Director

Cornucopia is pleased to welcome its new associate director and chief operating officer Daniel Doyle.

Daniel brings with him over a decade of experience in grassroots community organizing around the promotion, research, and support of sustainable initiatives and community development—in particular, small farm viability, local food system development, food justice, and food/farm policy.

With a background in both education and agriculture, he cofounded one of Mississippi’s first CSA farms, Yokna (patawpha) Bottoms, in Oxford. Committed to community-centered and ecologically responsible food production, Yokna



Bottoms grew to serve over 200 families in the two years under his management.

Prior to joining Cornucopia, Doyle served as the executive director for the Gaining Ground Sustainability Institute of MS and for the Mississippi Sustainable Agriculture Network (MSAN).

Daniel currently lives in Oxford, Mississippi with his wife and four children, as well as a rotating cast of farm animals.

We are excited by Daniel’s varied experiences and ability to offer fresh insights into

Cornucopia’s management and work protecting the integrity of organic agriculture and food.



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Demand Real Food



The core threats to organics that we've been discussing in this and past issues of the *Cultivator* include:

- The factory-farm takeover of organic dairy and eggs; and,
- The rise of giant hydroponic operations divorced from careful soil stewardship.

The USDA's unwillingness to stand for organic integrity means that we must employ our purchasing power to demand that retailers provide us with real food for ourselves and our families. Our proxy campaign is bringing this clarion call straight to the major grocery CEOs. Visit and share the link below; help us flood retailers with a roar for food from real organic—not factory—farms. <http://bit.ly/2oaSQvK>

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Support True Organic Farmers

Join Your Local CSA



If you haven't already, now is the time to sign up as a member of your local CSA (Community Supported Agriculture) farm. A typical membership with a weekly share ensures access to the freshest food available, while allowing you to engage in stewardship of sustainable farmland. Ask vendors and shoppers at your local farmers market or food co-op to find a CSA in your community.

Many CSA farmers are currently struggling to compete with conventional models, such as Blue Apron and Hello Fresh, attempting to piggy-back on the success of the CSA weekly box shares. Many such outfits make local and sustainable claims, while delivering conventional products no different than those found in a mainstream grocery store.

But a real CSA offers so much more. CSA members establish partnerships with their local farmers to guarantee the success of the farm. Your membership also keeps money in your local economy, while protecting your local waterways, open spaces, and soils.

There's no substitute for the freshness and flavor of local produce; CSA members often get a greater value for their upfront investment. What's more, CSAs offer an opportunity for you and your family to connect with your local grower, building community and strengthening the local food movement.

Through weekly updates and farm visits, see first-hand where your produce is grown and learn about the methods your farmer uses. Supporting organic farmers is ideal, but if your CSA farmer is not certified, you can use Cornucopia's DIY Certification Guide to ask them insightful questions about their practices before you join. The guide helps ensure you are rewarding the most ethical farmers who care for their animals and the land, while bringing home the healthiest food for your family.

- LINLEY DIXON, PhD