

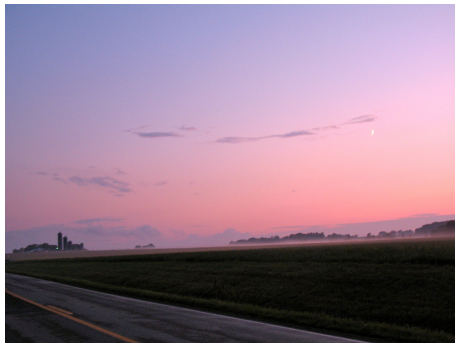
WHY WE CERTIFY

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"Come on, Mom, go faster! There's never any cops along this road and we've got to get there!" My son's urgency made a certain amount of sense. I'd never seen a police car along this stretch of backroad that was arrow-straight with good visibility, and getting to our destination early had definite advantages. My foot eased down on the gas pedal as I watched the speedometer rise to 60, then 65.

But suddenly, it occurred to me that this was not much different from obeying organic standards. I doubt there is a single person driving a car today who hasn't exceeded the speed limit or driven



without a seatbelt at times, even though we all know we shouldn't. But when we really have to get there and no one is watching . . .

Recently, New Farm held a poll on organic certification, asking farmers whether certification was "worth it". Leading the results, two answers basically were tied - "No, it's not worth the trouble" and "Yes, because I believe in it". This strikes us as intriguing, since neither of the leading answers reflect a marketing decision, which is of course

what USDA thinks organics is all about.

But I am concerned that a survey like this also reveals a deeper philosophical challenge in the organic community: What indeed is the point of organic certification today? Is it merely to get that magic certificate that will bring a premium price? Or is it to follow the rules because they will make us superior farmers, improve the environment, and are better for our health and the health of our children?

How do we keep organic certification from heading the way of certain traffic laws - following the rules only when we think we might get caught?

How indeed can we refresh organic farming's philosophical roots in today's Brave New NOP World?

WHERE DID AMERICAN ORGANIC CERTIFICATION COME FROM?

Let's start at the very beginning, or at least, let's go back about a hundred years ago. The philosophical roots of American organic certification standards can be traced through several 'family trees'.

In the early 1900's, Rudolph Steiner in Germany developed an agricultural philosophy that came to be known as Biodynamics. He recognized pure food from a healthy earth was essential for

human health and agricultural sustainability. Biodynamics is centered around the ideal of a self-contained farm, there should be just the right number of animals to provide manure for fertility and these animals should be fed from the produce of the farm. Steiner also introduced what are known as Biodynamic Preparations. Naturally occurring plant and animal materials are combined in specific recipes at certain seasons of the year and then placed in compost piles. These preparations, when used correctly, bear concentrated energetic forces that restore soil health, biodiversity and balance.

At the same time in Japan, Mokichi Okada advanced a similar concept that he called Nature Farming. Like Steiner, Okada made the connection between soil health, pure food, and a well-balanced spirituality. Compost also plays a key role for soil management, but unlike in Biodynamics, Nature Farming typically does not utilize animals, it does not put the same emphasis on crops grown for animal consumption, and avoids the use of animal manure and waste products as soil amendments.

In early to mid 1900's, scientists and agriculturists from many places were developing similar alternative agricultural concepts, often in opposition to the coming of agricultural chemicals after World War II. Dr. William Albrecht, Louis Bromfield, Sir Albert Howard, Lady Eve Balfour and others all promoted a healthy soil and well-planned crop rotation as the basis of productive sustainable agriculture, recognizing with concern that agricultural chemicals damaged soil life and long-term soil health.

During the 1960's, the Back to Land movement brought many non-farmers to the land, often without an agricultural background. These new farmers frequently came with strong philosophical, political and spiritual motives and limited financial resources. They generally avoided chemicals, outside inputs and large equipment, working small acreages to produce fresh market fruits and vegetables. Vegetarianism, frequently a part of the Back to Land movement, recognized that the best tasting, highest quality food was grown in a natural, non-chemical environment.

One man, J.I. Rodale, was extraordinarily instrumental in pulling these threads together for American organic pioneers. Influenced by proponents of Biodynamics and Natural Farming, along with the early organic agriculturists and European organic developments, Rodale wrote numerous publications that promoted crop rotation, avoidance of chemicals, and soil health as the foundation for agricultural sustainability and human health. The Rodale Institute and California Certified Organic Farmers (CCOF) were among the first groups offering American organic certification, as buyers and farmers increasingly demanded uniform verified evidence for organic claims and a definition of what 'organic' meant.

The California Organic Foods Act of 1979 was considered by many to be the *de facto* national organic standard for much of the 1980s. In the East, farmers and non-farmers in MOFGA and the NOFA's worked closely together to reach agreement in defining what organic farming and organic food should mean. Other groups throughout the country were working on the same issues simultaneously. In 1990, the Organic Food Production Act was passed in Congress at the request of the industry, authorizing a national organic program to be developed and administered

through USDA. On October 21, 2002, the USDA National Organic Program went into full effect.

By the late 1970's, the Rodale Institute's publication, Organic Gardening, was considered the bible for many organic market farmers. Indeed, our good friend Al Johnson, who was farming a market garden at that time, said that every month, Organic Gardening was read avidly by everyone and it was their favorite source of information on farming practices. Ehrenfried Pfeiffer wrote many articles for Organic Gardening, bringing Biodynamic principles to a wide audience. Klaas read the original Rodale New Farm magazine with equal enthusiasm until it was discontinued in the mid-1980's. For many midwest farmers, the favorite source of information was Acres USA, the publication of economist and agriculturist Charles Walters.

Today, many new organic farmers are like us, conventional farmers who have sought alternatives for diverse reasons - better health, aversion to chemicals, improved economics, and environmental concerns. These conventional converts are accustomed to professionally farming large acreages with powerful equipment. Many conventional converts have come initially for economic reasons, but decide to stay when they discover how organic practices actually improve their soil and crops. Large-scale farms of 200 to even 3000 acres are becoming equally common as the more stereotypical 10 acres of organic vegetables. Many new organic farmers also come from Plain or Evangelical Christian traditions, recognizing the organic approach is in harmony with their religious beliefs and lifestyle.

Like many conventional converts, we came into organics in the mid-1990's for reasons of economics, our health and that of our young children. The first few years were remarkable, the organic system worked so well. We eagerly converted more acres, tried more crops, and enthusiastically learned our way through the new agronomics and new bureaucracy that organic certification brought. A good friend once told us that we didn't just start organics on the ground running, we started with all wheels screeching and gravel flying! In our enthusiasm for our new found practice, we brought others along on the grand adventure, the neighbors and others who had watched our experiment suspiciously, then with interest. We cooperated with other New York organic farmers to form New York Certified Organic so we could learn together and develop a farmer-friendly and farmer-supportive certification, initially as an OCIA chapter. Those last years of the 1990's were heady times of rapid growth and of terrific positive reinforcement - our experiment had worked astoundingly well and we all were so impressed! Because we believed so strongly in organic farming and in the integrity of organic certification, we had little doubt that everyone else in the organic community felt exactly the same way.

WHERE ARE WE NOW?

Many people will say that the coming of the National Organic Program changed everything. It hasn't, but the NOP has changed many relationships and attitudes subtly, markedly altering the balance of power and influence in the organic community. Much of the change has been for the good, but not all.

For us, the NOP has neither changed our farming practices significantly nor our commitment to organic certification. We are still trying to find better ways to farm organically and to manage our soils and rotate our crops more productively. The past 4 years of extreme weather have

certainly challenged our understanding of organic processes. Things that worked under near-ideal conditions of the late 1990's have not always worked well under the extreme wet of 2000 and 2003, nor the extreme dry of 2001 and 2002. We're also seeing that some of the soil fertility practices that worked well when we first started organics need to be altered and re-thought as our soils change. Increasingly we humbly realize that it will be quite a while before we really "have the system down"!

Regardless what the weather brings, it is still important to us to stay strictly within the organic certification boundaries. We do this, not because we fear surveillance and enforcement, but because we believe organic standards generally guide us to doing the best thing for our soil, our



crops and our environment. Occasionally though, we question whether using some practices outside organic standards might actually be better agronomically than using allowed ones. Take for instance the Great Potassium Dilemma. Because of the successive years of adverse weather, especially this spring, there has been a suppression in microbial activity in our soil. We've done everything we possibly can to stimulate microbial activity but the weather has been working against us. Certainly there is plenty of native potassium in the soil, but

our soil tests show it dropping precipitously and our crops can't get at it without good microbial activity. So, how do we supplement potassium within organic standards? Potassium sulfate would be the best choice, it is the easiest on the soil, but the only mined source we could find locally had been treated with a petroleum-derivative as a dust suppresser. Our other choice under NOP rules is potassium chloride or muriate of potash. Muriate is allowed, but it hard on the soil, especially on the very microbes we are trying so hard to stimulate. In our minds, potassium sulfate would have been the better agronomic choice, but muriate is what we have had to use to stay within the standards.

To be perfectly honest, it would be quite easy to get away with using prohibited materials or practices on our farm. The inspector is here for only a few hours one day a year - it wouldn't take much effort to make sure they never see anything suspicious, for after all, too often the assessment of organic integrity seems based primarily on the "if it says so, then it is so" mentality. However, what would be the point? We follow the organic standards because we WANT to, not because we HAVE to, and certainly not because the government, our certifier or the inspector is looking over our shoulder. We still believe that the vast majority of organic farmers feel this way too, but unfortunately there are exceptions. We find it interesting that as new Organic Trade Association members, we were expected to sign the OTA Code of Ethics which, among other things, obligates us to report organic fraud if we know about it. Not a comfortable position to be put in. This is particularly interesting since a friend who works in certification once told us that inspectors most often pick up mistakes or poor judgement, but outright fraud is usually reported by neighbors or buyers.

That's the Big Stuff, but with deep concern, an inspector friend of ours recently spoke of what he calls "an increasing level of sneaking non-compliance" - an attitude of seeing how little you can get away with, a "one foot just under the fence" mentality. He feels this represents a pervasive shift in attitude among both new and long-time organic farmers and processors because the teeth of enforcement are sometimes actually less effective under NOP. Certifiers are now in hot competition with each other to keep clients and keep costs down, sometimes there appears to be a lack of desire to alienate customers with stern warnings and sanctions. A minor non-compliance is not very serious, usually not enough to cause decertification, so most punishments may not be sufficient incentive to "toe the line". Also, because organic certificates no longer expire, this year has seen a surprising number of producers who have simply not applied for annual renewal. They still hold unexpired certificates that make their products salable, buyers don't necessarily know if a producer has renewed, and under NOP, it is hard to use the lack of renewal to take away a certificate. There is also concern about the attitudes of new large conventional companies getting in, wanting part of the organic action but not honestly valuing organic as anything intrinsically different.

This undercurrent is a serious concern to anyone who respects the integrity of the organic system, but to address it adequately, it is essential to consider where it may be coming from.

IMPROVING THINGS - NOW

Organic certification at its best is like good parenting. OF COURSE it is important to have strict but sensible rules that, when followed, lead to good productive acceptable behavior. But children respect parents who administer rules fairly with understanding and caring, frequently rules must be explained and repeated with patience, and there must be enough flexibility to recognize that all situations are not equal. Occasionally, punishment will be necessary but as a last-resort way to better explain the rules and not in an arbitrary spirit of vindictiveness or simply to prove who's in charge.

In our opinion, the very best solution for non-compliance problems is strong proactive education and a supportive local organic community. A farmer is much more likely to comply to the letter of the law if they understand how the standards will make them better farmers. Educating a farmer on the agronomic value of crop rotation and helping them find additional markets for more crops will usually ensure that they rotate wisely. Educating a farmer on what soil fertility amendments they can use for different problems will usually ensure they choose something allowed. Educating a farmer on good pasture management and organic animal health care will usually ensure that they will have healthy animals that don't need antibiotics. Educating and helping a farmer develop an appropriate audit trail will usually greatly improve record keeping. Reminding a farmer regularly of all the rules and requirements will generally ensure they make better decisions when challenged. Much of this information is simply not intuitive and very few farmers are eager to spend long hours digging the information out. Simply knowing that a local community cares and is both helping and watching will usually make decisions more honest, 365 days a year.

Unfortunately, NOP rules prohibit both certifiers and inspectors from 'consulting' or providing information about overcoming barriers for certification. This has meant that the usual channels of accurate certification information and education have largely dried up. While certifiers are

permitted to present certification information through newsletters and group meetings, many of the certifier newsletters we have seen this year seem to contain less truly useful certification information and are coming less frequently. We can somewhat understand why this provision was added to the NOP, neutrality is certainly important, but unfortunately it is already producing a lower educational and awareness level which will invariably lead to greater non-compliance, both intentional and unintentional. There is a serious need for accurate information and education that no one is now filling.

Equally important though is that many farmers are losing a sense of respect for certifiers and the organic certification system. Without respect, it becomes very easy to justify low-grade cheating. We all know that lack of respect for 'cops' often is one common justification for disobeying traffic laws. How can we maintain respect throughout the organic community for the authority of organic certification, when frequent derisive talk and articles about NOP staff and their decisions, and about schizophrenic, unresponsive or lax certifiers convey a message to others that the certification authorities do not deserve respect. Even if we personally have no intention of being non-compliant, our listeners may draw a very different conclusion from our words.

Perhaps in some ways, we as a community may be reaping what we have sown. I am reminded of an article I once read in the Amish magazine, *Family Life* (Pathway Publishers, Rt. 4, Aylmer, Ontario N5H 2R3 CANADA, or 2580N-250W, LaGrange, IN 46761 USA), that said if parents are disrespectful of a teacher at home, almost invariably the child will be disrespectful of the teacher at school. It is important for the leaders of the organic community to show respect for the certification system and for the NOP supervision, even if we don't always agree with it. Without an environment of respect, the level of 'sneaking non-compliances' is likely to increase and be considered more widely acceptable. BUT, it is also equally critical that the NOP staff, the NOSB and the certifiers are worthy of this respect.

Does this mean that we all should be brainless Pollyannas, cheerfully accepting whatever comes down the line? Of course not, we have a serious responsibility to make sure that organic certification is the very best it can be, and when we see problems, we have a responsibility to address them constructively. But it does mean that dissent and change must be done in a respectful manner, so that the wrong message is not passed on to others inside or outside the organic community. Most of us are trying our hardest to do a good job in an imperfect world, even when our efforts may seem misguided or inadequate to others!

Several years ago, at a conference at the Rodale Institute, we heard Bob Anderson, formerly of Walnut Acres and of the NOSB, speak eloquently on certification under the NOP. In his opinion, as the playing field levels and certifiers have to compete head to head for customers, two factors will ultimately determine which certifiers are successful. First is SERVICE - being responsive, consistent, fair and transparent with their customers, answering questions, providing information and providing certification services in a farmer-appropriate manner. The second factor is VALUE - providing all these services at a competitive and fair price. Recently a friend told us that one certifier had quoted him \$900 (all fees including inspection) to certify his 30 acres of corn and soybeans. Obviously no one had considered whether this was an appropriate fee for the potential income! Come on, folks, let's get real, farmers aren't rich, especially not

this year! Certifiers might want to determine what percent of organic farm income that certification is worth (1% ?, 5% ?) and then make sure that ALL fees do not exceed that total percent, regardless of what method they use to calculate their fees. But, farmers also need to realize that there is a heck of a lot more work involved in processing their certification from start to finish than they realize!

Bob Anderson likened certification decisions to how a farmer buys a tractor. The dealership offering the best service and value for the product most suited to the particular farm will be successful. Other dealerships may offer similar products, but without on-going farmer-appropriate service and value, they are not likely to be chosen.



Unfortunately, service and value don't always also include high INTEGRITY. Relaxing certification surveillance and enforcement may reduce costs and attract a certain type of customer but that will not usually engender respect. Some certifiers may make it unduly easy for an operation to certify, especially large operations that will bring in substantial user fees, while other certifiers may make it unduly difficult. But true respect is something that must be earned. Hopefully those certifiers that fairly and consistently exhibit and expect high integrity, while still providing good service and value, will

ultimately be ones the most respected.

WHERE ARE WE GOING?

The National Organic Program, now a year old, is here to stay. This is where we are, it is not a choice. Our customers now have a fairly consistent uniform definition of what 'organic' means.

Is it perfect? No, of course not. There are "up" sides and "down" sides to the new NOP system and there have been some well-publicized stumbles along the way this year. The certifiers are under greater supervision, some wish this supervision was stricter and more evenly administered, some wish it was less strict, and many wish that more NOP resources were better allocated to combat non-compliance at all levels. No doubt at times, expectations of the NOP have both exceeded and underestimated reality, but for the most part, we feel the overall trend has been positive.

We do worry that currently there is a real potential of losing the forest (integrity of the overall system) for the leaves, or shall we say, a hair on an individual leaf (approval of individual minor ingredients). Far too much effort is being spent on approving inputs, which are, of course, what a sound organic system should be taking us away from. A fine example of this is aloe juice, an excellent product for stimulating an animal's natural defenses and avoiding antibiotics, which is currently being prohibited by some certifiers because it contains trace amounts of potassium sorbate as a preservative. Hopefully there will be ways for the organic system to evolve as we learn more, becoming more inclusive of some materials that may not fit strictly within the current organic confines.

We must not forget that organic certification was far from perfect before the NOP. Turf battles, superiority complexes, and inconsistent standards and enforcement were all too common. At least now no longer are OCIA dairy farmers prohibited from using NOFA-NY hay, no longer do NOFA-NY farmers have to get document reviews approved before using OCIA hay. There is still a distressing amount of variation between how different certifiers interpret and enforce the same basic NOP standards, but hopefully that will even out in the next year.

The organic community is a much more diverse place than it was just 10 years ago, making communication and agreement more challenging. Small organic farmers may have trouble trusting the legitimacy of large scale farmers, traditional organic farmers may have trouble trusting the intentions of conventional converts, and vice versa. And, very importantly, we must see that our community is much more complicated - and larger - than that! A recent Reuters news service article highlighted the extensive growth of organic acreage in China, stating that the Chinese farmers “are no hippie farmers shunning conventional farming practices for the sake of the environment. They are poor farmers who can’t afford expensive chemicals used in intensive farming, going organic to boost their meager incomes.” These Chinese farmers, and the businesses backing them, are selling increasingly into our markets and it would be a mistake to underestimate the potential impact of this coming international supply in a world of rapid transportation.

As we face these new challenges, hopefully we can see that our organic community really can be richer for the increased diversity and that we must learn to respect each other for our unique contributions.

Why do we certify? Quite aside from the fact that our buyers and the government now require ‘organic’ to mean ‘certified organic’, we still believe that the discipline of organic certification, even in this Brave New NOP World, is definitely worth it and that it makes us better farmers. And we still feel strongly that working within the system to improve organic certification is also absolutely critical.