

Organic Matters

Spring 2021



Hydroponics Debates: Where have they been, and where might they go?

In a [recent letter to Secretary Tom Vilsack](#), Frances Thicke and more than 40 prominent farmers and former NOSB members, implored the USDA to address multiple concerns about state of the National Organic Program (NOP).

He quotes the 2010 NOSB recommendation against certifying hydroponics: “systems of crop production that eliminate soil from the system, such as hydroponics or aeroponics, can not be considered as examples of acceptable organic farming practices. Hydroponics, the production of plants in nutrient rich solutions or moist inert material, or aeroponics, a variation in which plant roots are suspended in air and continually misted with nutrient solution, have their place in production agriculture, but certainly cannot be classified as certified organic growing methods due to their exclusion of the soil-plant ecology intrinsic to organic farming systems and USDA/ NOP regulations governing them.”

At the same time, the MOA Policy Committee, and the Organic Farmers Association Governing Council have been reviewing the hydroponics debates, and visiting with Senator Jon Tester, ready to consider new strategies to tackle this thorny issue. In that context MOA Chair and OFA Governing Council Advisor Becky Weed writes this update for both MOA and OFA newsletters.

In 2010, the National Organic Standards Board (NOSB) recommended against allowing the organic certification of hydroponics. In 2014, the National Organic Program (NOP) officially permitted it, essentially ignoring the NOSB. Reaction to that discrepancy has variously festered, shuffled, and raged ever since. After more than ten years of debate, the vast majority

of Organic Farmers Association (OFA) members consider this to be a high-priority issue. Over the same ten years, the hydroponics industry has grown to be a \$1+ billion industry. It's time for distillation of the issues; an update on actions and arguments since 2010 that may inform choices; a look at why the debates still matter; and a plan.



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Unique Opportunity with Terrapin Farm

The Montana Organic community supported me through OCAM when I moved to this "new" farm 27 years ago. Change is never easy. So it is with very mixed feelings that I am writing the following listing. Please do feel free to share it appropriately and to ask me questions.

*Thank you all,
Judy, Terrapin Farm*



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Seeding Community in Southwest Montana

By Ben Clark, Vilicus Farms

The warming weather and unfolding of spring across Montana finds a lot of farmers busy in their fields and greenhouses, planting seeds to nurture into nutritious crops. This year there are also different seeds being sown—the seeds of community. Young and beginning farmers in the southwest region of Montana are setting up the first chapter of the National Young Farmers Coalition here in the state of Montana. The National Young Farmers Coalition is a farmer advocacy organization that specifically focuses on issues that young and beginning farmers face in starting farms, accessing land and capital, and organizing the resources that contribute to a successful farm business. While at a national level the NYFC organizes and lobbies for meaningful policy change, in the local sphere the NYFC regional chapters can serve many needs and purposes. These chapters can help shape local county and state policy, but they also provide a social and business support network, with many farmers contributing resources and skills to the community. While in the early stages of creation, the Southwest Montana National Young Farms Coalition chapter is shaping up to be a community resource to many aspiring and current farm business owners and workers.

While starting a brand new chapter of an organization like NYFC is daunting, the Southwest Montana NYFC chapter is lucky to have some very dedicated people bringing it into reality. Dylan Fishman and Alyssa Stewart, owners and operators of Foxglove Flower Farm in Bozeman, along with Becca Skinner and Ally Engelbrecht are the founding members of the chapter. After canvassing for other individuals and farms potentially motivated to join, the group hosted a zoom call to welcome others interested in creating the chapter and community together. More than 30 or so individuals from many different backgrounds participated and made it clear that there was a desire to form a chapter here in Montana. Since then, there have been several virtual meetings, and the group continues to work through the process of setting up an official chapter of the NYFC in the Southwest of Montana.

Starting a farm or beginning a career working in agriculture can be a particularly challenging journey. Farming is not just hard work, but also a diverse and complex array of skills that must be learned and mastered to make a farm business successful. Farming can be isolating, confusing, and downright disappointing at times, especially in the early stages of one's education and experience. Young farmers have huge challenges like gaining access to land, equipment, and capital in order to begin farming, and then on top of that young farmers are just beginning to learn the nuances and skills that come with the job. It is important that a young or beginning farmer have the backing and support of a kind and generous community to help them through the learning process of running a successful farm enterprise. That's where organizations like the Southwest Montana NYFC can be the most effective. One of the first tools the chapter is putting together is an online "Skill/Tool Sharing Directory" where members can post offerings to the group to help and support each other as needed. Focusing on what young and beginning farmers can offer each other as opposed to competing with each other is a valuable insight that this group of Montana farmers is keen on sharing.

Participating in a chapter of the NYFC is one way a young or beginning farmer can begin to engage with farming not just as a career but also as a greater community to advocate for. Farmers need to make their voices heard more than ever as our food system grows more consolidated and precarious every year. For there to be a future in agriculture there must be a clear path forward for a young or beginning farmer to succeed. That is becoming increasingly difficult as the weight of student debt balloons, and as the real cost of living rapidly outpaces the wage an agricultural worker can reasonably expect from their farm labor. In addition, the small community of those making their living in agriculture can be isolating and highly stressful for an individual, leading many young farmers to experience mental health struggles. Starting a farm is an overwhelming task, and to those engaged with that process it is vital that

they have the support they need from a healthy community of people who understand the reality of their experiences. The issues facing young farmers are many and diverse, and so must be met with many and diverse solutions- and that is what the NYFC strives to do.

As the chapter continues to develop there is sure to be more that they bring to the farming community in Montana, and we are excited to see the development of the younger farming community here in our state. Young farmers continue to bring innovation and energy to agriculture, with many young farmers choosing to farm organically, and with the health of our shared ecosystems in mind. We support the formation of the Southwest Montana NYFC and look forward to collaboration and engagement in this season and in the coming years. If you are interested in learning more, joining the chapter, or offering support in some way, you can reach out to them on Instagram: MontanaYoungFarmers, or through email montanayoungfarmers@gmail.com



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Carbon Markets Popping Like Daffodils in Spring

By Jeff Schahczenski, NCAT

*Spring has come to Montana and private agriculture carbon markets are flowering nationwide. The table below, published in a recent **Farm Journal Report**, provides a momentary snapshot of what is to come. Are these markets a new source of revenue that organic farmers and ranchers need to investigate?*

My comments and dare I say advice are as follows:

Rewarding the worst.

These markets reward those that undertake new or additional activities that lead ideally to permanent improvement in soil carbon sequestration. Fortunately, and unfortunately, those doing great conservation efforts as most organic farmers and ranchers are already doing, will not be eligible to gain from these schemes. The buyers of soil carbon want new additional soil carbon and will not pay for those practices that have been on-going. For example, cover cropping, an essential practice of all organic farmers, cannot be newly “adopted” to add soil carbon and thus those already doing the practice largely are not eligible for support. Thus, those with poor practices benefit, those who are good stewards do not.

Not a market solution to climate disruption.

These mechanisms for encouraging climate-friendly systems are not free markets. The conditions of a free market are that they be economically competitive, facilitate easy entry and exit, and that all participants have perfect knowledge of what they are buying and selling. The buyer and sellers must have the ability (power) to impact price, can easily enter or leave the market and that the buyer and seller mutually know exactly what they

are buying and selling. Looking at the chart of carbon markets below it is not even clear that the product being bought and sold is soil carbon. For example, the Bayer program pays per acre for no-till practice that is merely assumed to increase carbon in the soil. In addition, the terms of contractual obligations are highly variable but largely restrictive in most cases, meaning entry and exit from the market is not simple or easy. Finally, and perhaps most importantly, it appears that the buyers (farmers and ranchers) have little competitive power over the price of carbon. Indeed, three of these so-called markets have already set prices.

Buyer beware.

Though the chart does not provide all the detail, many of these schemes be careful as to what you are committing to and what payment you are likely to receive.

These schemes undermine whole-farm solutions.

Paying farmers and ranchers for sequestering soil carbon narrowly views soil carbon as the singular or only value of importance to good stewardship of their land. Organic farming not only a system of production that is inherently climate-friendly it also provides a flow of benefits such as water quality, biodiversity, soil conservation, soil health, and resilience.

What is also surprising to me is that these schemes are largely unnecessary if we reformed and better funded the existing working lands programs offered by the NRCS.

An ATTRA publication can help understand how to better access these programs at <https://attra.ncat.org/product/federal-conservation-resources-for-sustainable-farming-and-ranching/>



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Thank you Vilicus Farms for Supporting MOA!

Dear MOA Members: MOA works with organizations like the National Sustainable Agriculture Coalition (NSAC), the Organic Trade Association (OTA), and more on policy issues. Many times questions are asked about how farmers are interacting with federal programs; are sign ups going well? Are you being sufficiently notified of programs for your farm? What programs do Montana’s organic farmers use? Are there problems with requirements for organic farmers?

Help MOA know what works for you and what doesn’t work for you, at any time, by dropping a line. The squeaky wheel really does get the grease. These organizations have the capacity to amplify MOA members concerns with research, collaboration with other organizations, and with excellent contacts in Washington, DC. moamembership@gmail.com

Jamie

jamieryanlockman@gmail.com

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HOW SOME LEADING CARBON MARKETS COMPARE

	BAYER	ESMC	FARMERS BUSINESS NETWORK
Market Launch Date?	2020	Fall of 2022	September 2020
Acreage Enrollment Minimum	10 acres	No minimum	Various, but generally at least 200 acres
Per-Acre Cash Payment to Farmers?	\$10 (producers will be paid by the acre, not by the amount of carbon sequestered).	Not specified. Producers will be paid annually for the amount of increased soil carbon sequestered, reduced GHG emissions, pounds of phosphorus and nitrogen and tons of sediment prevented from release into the watershed, and annual water savings from reduced irrigation (based on ESMC quantification, verification and third-party certification).	Payments are market and buyer dependent. Producers can receive anywhere from 30¢ per acre for research programs to more than 15¢ per bushel for identity preserved premium programs.
What Do Your Contracts Require Farmers to Do? What Are the Terms?	Bayer's carbon initiative pays producers for adopting climate-smart practices such as no-till, strip-till and the planting of cover crops. Producers are required to plant corn or soybeans, have an active FieldView Plus account and agree to share the data needed for the program.	<ul style="list-style-type: none"> ▶ The contract period is 10 years and includes cropland or rangeland. ▶ There is no contractual volume for producers; the producers' outcomes are calculated annually over the course of a 10-year crediting period, which can be renewed to a maximum of 20 years. ▶ Producers must register and enter required information for asset or credit generation, and certify information entered is accurate. ▶ Producers must show ownership of the assets to be generated to sell them into the market. ▶ No enrollment fee or requirement to purchase ag products. ▶ Implementing conservation could have associated costs. Producers might be responsible for practice implementation costs and expenses such as soil carbon testing. 	Producers share information with Gradable on their crop production practices (including planting, fertilizer applications, tillage and harvest), which is processed with artificial intelligence that leverages 240 million acre-events of farm data from FBN. Gradable validates and distills the practices into a single farm-level score, which allows farms to be rewarded for practices without having to share detailed practice information with buyers.
More Information	BayerCarbon.com	EcosystemServicesMarket.org	Gradable.com

To learn more about the tools, incentives and points of differentiation each of these carbon markets offer to farmers, visit:

AgWeb.com/carbon-markets

INDIGO AG	NORI	NUTRIEN
June 2019	September 2019	2021
150 acres (a minimum of one field)	1,000+ acres	Target: 500 to 10,000 acres per producer.
<p>\$15 per carbon credit, with a guaranteed price floor of \$10 for growers who enrolled in the program beginning in 2020.</p>	<p>\$15 to date, which is based on current prices for producers generating and selling Nori Carbon Removal Tonnes (NRTs). Producers set the floor selling price for NRTs, which sell when buyers are willing to pay that floor price plus Nori's transaction fee.</p>	<p>Not specified. Carbon pricing is under development but is expected to be at a level to support the adoption of targeted agronomic practices by growers.</p>
<ul style="list-style-type: none"> ▶ Producers dictate their own participation in Indigo Carbon and may choose to pilot on a handful or all of their fields in the first year. Growers can continue to enroll more eligible fields in subsequent years if they qualify. ▶ To be eligible for the program, a grower must contract at least one eligible crop field, hold exclusive operating rights to their land, have not cleared the land in the past 10 years and not receive payments for the land through another carbon credit program. ▶ Producers must commit to making at least one practice change on each enrolled field. There is no cap on the number of acres growers can enroll. ▶ Producers must submit three to five years of historical data depending on crop rotation as well as current season details about planting and harvest dates, tillage and fertilizer applications. When applicable, farmers must provide information on cover crops, organic amendments, irrigation and grazing. 	<ul style="list-style-type: none"> ▶ The individual (producer) who signs the contract is signing a 10-year contract to make their best effort to retain carbon and report on data annually. ▶ To qualify, third-party verification costs are paid by the participating farmer. Verification must occur once every three years. ▶ The producer must receive assignment of authority from any landowners of farms they plan on enrolling in the Nori marketplace. ▶ Anyone who receives cash from credits sold must pay taxes on that income (taxes determined by the state in which the farmer lives). 	<p>The program, which is activating through Nutrien Ag Solutions, is voluntary and will involve a producer program participation agreement, which requires producers to fulfill sustainable farming practice obligations to receive grower payments. Producers participating in the program will agree to start providing data and implementing practice changes shortly after signing up. Details of the program are still under development, including terms and conditions.</p>
<p><i>IndigoAg.com/for-growers/indigo-carbon</i></p>	<p><i>Nori.com/for-growers</i></p>	<p><i>Nutrien.com</i></p>

MOA Addresses Grasshopper Treatments in Montana

Grasshoppers - 2021

Grasshopper damage reports were standard in 2020, and this year, USDA Animal and Plant Health Inspection Service (APHIS) predicts that sixteen Montana counties may again have a significant grasshopper problem. Those counties are BLAINE, CASCADE, CHOUTEAU, FERGUS, GLACIER, HILL, JUDITH BASIN, LEWIS & CLARK, LIBERTY, MEAGHER, PETROLEUM, PHILLIPS, PONDERA, TETON, TOOLE and VALLEY counties (except Fort Peck Reservation).

Anna Crabtree-Jones with Vilicus Farms was contacted by the Xerxes Society about planned grasshopper treatment in Montana and forwarded the MOA office an Environmental Assessment (EA) prepared by APHIS that describes plans to treat Montana's 2021 grasshopper crop. The treatment plans are specific for rangeland and provide cost-share funds to ranchers wishing to spray or bait to eliminate the insects. APHIS only treats grasshoppers upon request and after determining that treatment is warranted. This evaluation includes measuring grasshopper densities, identifying species, identifying the insects' biological stage, timing options, and other ecological considerations. The cost-share funds available for treating Federal, State, tribal Trust, and private lands vary depending on the entity that controls the treated parcels.

Review

After reviewing the EA, MOA consulted with several members and experts to review the treatment plans and respond to issues raised in the document. The review team found that there were a dozen issues that APHIS should address to accommodate organic producers.

Response

MOA's response noted that Montana has more than 350 USDA-certified organic operations that vary from farms growing wheat, pulses, and hay to ranchers with livestock to those growing vegetables and fruit as well as handlers, food processors, and more.

In the US, Montana has the third most acres in organic production (over 350,000) and is the number one producer of organic wheat, lentils, chickpeas, emmer, and spelt. It currently has nearly 30,000 acres transitioning to USDA-certified organic production, representing more than 10% of the US total 255,000 transitioning acres.

There are approximately 230 USDA-certified operations in the sixteen counties included within the scope of EA or nearly two-thirds of all USDA-certified organic operations in Montana. MOA is unaware of country-specific data regarding the number of farm and ranch operations and acreages transitioning. USDA Organic Standards require that certified operations be free of prohibited substances for three years.

Accidental exposure to prohibited substances, including aerosol and aquatic drift, can cause certificate suspensions. Consistent with the USDA National Organic Standards, MOA's preference for addressing grasshopper infestations in the state is to control pests "primarily through management practices including physical, mechanical, and biological controls." If these practices are not sufficient, MOA prefers the options of using biological, botanical, or synthetic substances approved for use on the National List, such as BoteGHA, to control pests.

MOA further states that it recognizes that



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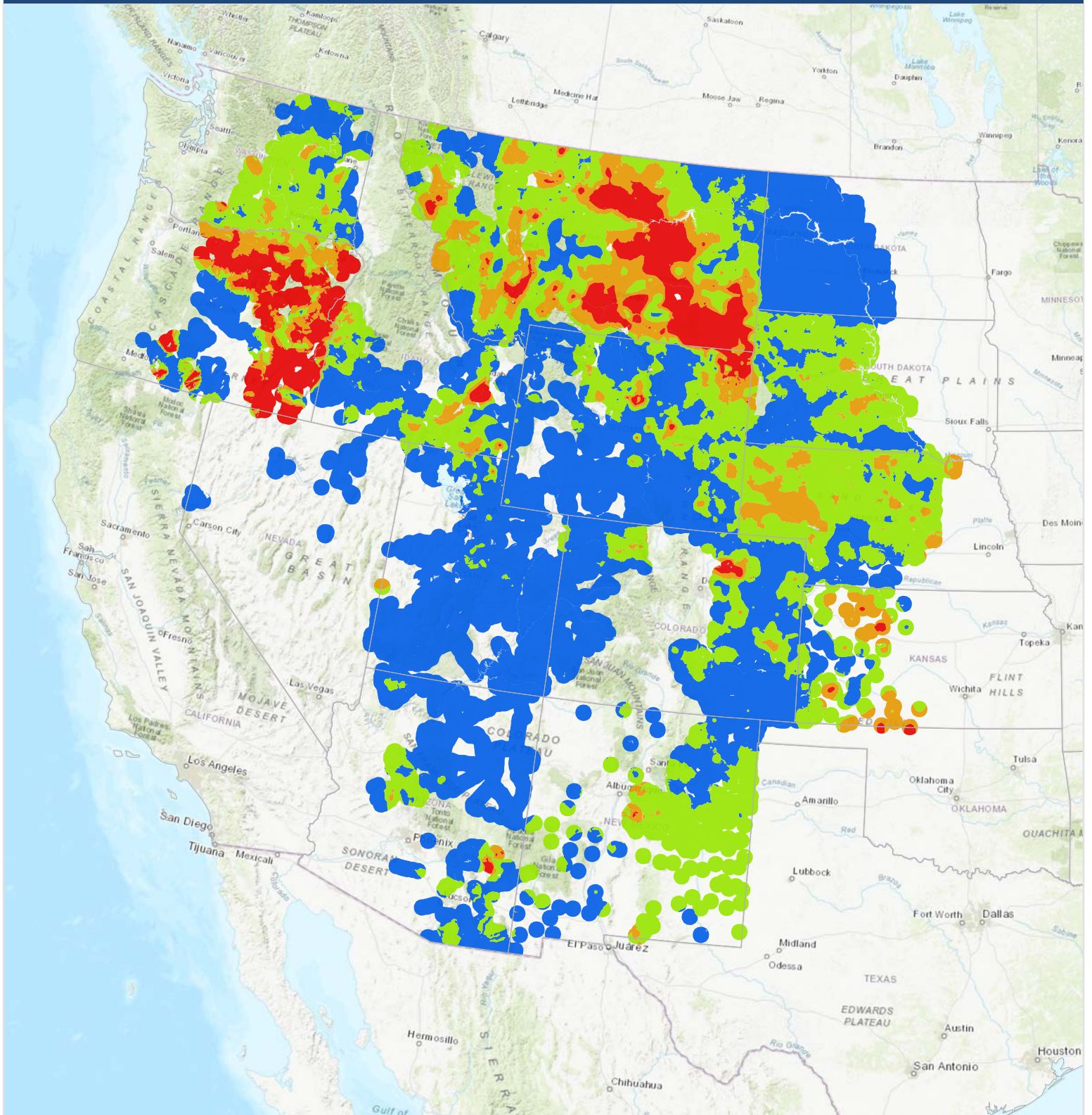
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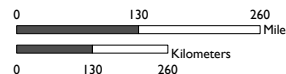
Grasshoppers per sq. yd.

Based on 2020 Adult Survey

0 - <3	246.6 million acres
3 - <8	164.1 million acres
8 - <15	49.6 million acres
15+	34.6 million acres

Data Source: The data summarized in this map were furnished by the respective state, county, university, and/or federal agency using a variety of survey methods and analytical techniques. Due to funding considerations, states may not have continuous survey coverage. This map was prepared by USDA APHIS PPQ in cooperation with CPHST.

Preparation Notes: Adult and treatment survey densities of adult specimens were interpolated to a maximum buffer distance using an empirical Bayesian kriging model. Areas were then filtered by major water features to produce final acreage estimates. Acreages are approximated based on rounding to millions of acres.



USDA, APHIS, PPQ
2150 Centre Ave
Fort Collins, Co 80526

Date Created:
10/8/2020

These data, and all the information contained therein, have been collected by the U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS), or by its cooperators on APHIS' behalf, for restricted government purposes only and is the sole property of APHIS. See full disclaimer: <https://www.aphis.usda.gov/help/data-disclaimer>

grasshopper infestations have multiple causes, including those related to natural cycles. Many treatments for these insects do not have effective success rates due to an array of uncontrollable variables, including predicting targeted insect life cycles, weather, and environmental and ecosystem conditions. Further, these treatments can affect non-targeted insect species, including predator species that can potentially control grasshoppers and other pests.

Getting the Word Out

The MOA review team did not believe APHIS planned sufficient efforts to reach Montana’s organic farmers affected by the spraying. MOA submitted written comments that recommend including making direct contact with affected organic farmers and ranchers to notify them of planned treatments in addition to posting public notices in newspapers and erecting signage during treatment. Additionally, MOA requested that provisions be made if an organic producer’s certificate was jeopardized. APHIS responded positively and planned to address MOA’s concerns. Additionally, in the future, MOA will be contacted for notices about projects that affect Montana’s organic producers.

Should you reside and farm in the sixteen counties listed, you may receive a letter informing you of planned grasshopper treatment within your area. This letter will have contact information and directions for answering any concerns you may have. You can find EA, the letter MOA sent to APHIS, and more information about grasshoppers on the MOA website.

MOA strives to serve its membership and represent the interests of Montana’s organic community. Please let us know of any issues you believe MOA can lend its voice to ensure that your interests are supported.

Call for Nominees

Call For Nominations: MOA Awards

Nominations and Awards The MOA Awards Committee is seeking your nominations for two awards to be presented at the Annual Conference.

The “Lifetime of Service” award goes to an organic producer, handler, retailer, researcher, service provider (or other) who has demonstrated a long-term commitment to organic agriculture in Montana. The award went to Ernie Harvey (2020).

A “Leadership in Organics” award goes to an organic producer, handler, retailer, researcher, service provider (or other) who demonstrates an on-going commitment to advancing the adoption, practice, and success of organic agriculture in Montana. The award went to Ty O’Connor in 2020.

Written nominations may be submitted by MOA members no later than September 1, 2021, by email or regular mail to: Judy Owsowitz, 6505 Farm to Market Rd, Whitefish MT 59937, phone (406) 862-6362, email: terrapin@aboutmontana.net.

Please provide the following information with your nominations:

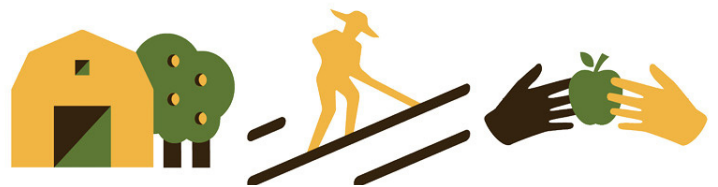
- 1. Nominee’s Name, Address, Phone and Email**
- 2. Describe the nominee’s connection to organic agriculture (100 words or less).**
- 3. Why the nominee should receive the award.**

It is preferred that nominees be members of MOA, but Board Members cannot be nominated. Please include your contact information.

The Awards will be presented at the Conference and Awards Banquet in December 2021.



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About Montana Harvest of the Month

The Montana Harvest of the Month (HOM) program showcases Montana grown foods in Montana schools, institutions, and communities. Each month, participating sites focus on promoting one locally grown item (e.g., winter squash) by serving it in at least one meal or snack and displaying or distributing HOM materials. Additionally, schools, afterschool programs, early care and education sites, and summer food service program sites participate by offering taste tests to children and doing educational lessons and activities. Montana Harvest of the Month is a perfect way to launch or grow a farm to school or farm to cafeteria program, as it provides an easy framework to follow and ready-to-use materials. Participating sites receive a free packet of materials (includes posters and cafeteria, classroom, and home handouts) as well as guides, additional resources, and training.

Dig Deeper

Get more information, register, or download resources:

Aubree Roth

Montana Farm to School Coordinator

aubree.roth@montana.edu | (406) 994-5996

www.montana.edu/mtharvestofthemonth

How Producers, Processors, and Distributors Can Participate

- **Find HOM sites** in your area or encourage potential sites to register by calling or visiting with an educator, administrator, or food service staff. Find a map of participating sites or watch and share the short informational video at: www.montana.edu/mtharvestofthemonth.
- **Join a team.** All HOM sites are required to have a team that includes at a minimum an administrator, food service staff, and educator. Participating sites are also encouraged to include others on their team including producers, Extension agents, students, parents, and others.
- **Review available resources for selling to schools and institutions in Montana:**
 - Montana Harvest of the Month Webinar for Producers: <http://farmtocafeteria.ncat.org/2016/04/05/webinar-the-montana-harvest-of-the-month-program/>
 - Montana Farm to Cafeteria Manual: <http://www.montana.edu/mtfarmtoschool/resources/school-food.html>
- **Use the HOM calendar to plan and market.** Following the calendar (see page 2) is recommended, but teams can change the order to suit your growing schedule or the site's needs. The calendar will likely change each year as new items are added.
- **Meet with the food service director** at participating sites to discuss HOM purchasing needs, delivery schedule and requirements, food safety considerations, quantities, and product specifications.
- **Offer to host a field trip or to visit the sites** to teach about HOM items. Bring samples for taste tests and talk about your process in raising, growing, processing, or making food.

Updated June 10, 2020



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MONTANA
Harvest
of the Month

August 2020 – July 2021

Calendar

Although we recommend following this calendar, your school or program can change the order of the calendar to suit your needs. None of the materials are printed with the month. The calendar will likely change each year to include new foods!



August – Cherries



September – Brassicas



October – Apples



Nov. – Winter Squash



December – Lentils



January – Carrots



February – Beets



March – Grains



April – Chickpeas



May – Beef



June – Leafy Greens



July - Dairy

For More Information

Aubree Roth, Montana Farm to School Coordinator | aubree.roth@montana.edu | (406) 994-5996

www.montana.edu/mtharvestofthemoth



The Montana Harvest of the Month program showcases Montana grown foods in Montana communities. This program is a collaboration between Montana Farm to School, Office of Public Instruction, Montana Team Nutrition Program, National Center for Appropriate Technology, Montana State University Extension, Gallatin Valley Farm to School, FoodCorps Montana, and Montana Department of Agriculture. More information and resources are available at: www.montana.edu/mtharvestofthemoth

Funds were provided in part by USDA Team Nutrition Training grants, USDA funds, USDA Farm to School grants, Montana Healthcare Foundation, Northern Pulse Growers Association, Montana Department of Public Health and Human Services, Montana School Nutrition Association, Montana Department of Agriculture Specialty Crop Block Grant, Montana Grains Foundation, Dairy MAX, Montana Pulse Crop Committee, Montana Wheat and Barley Committee. This institution is an equal opportunity provider and employer. The Montana State University Extension Service is an ADA/EO/AA/Veteran's Preference Employer and Provider of Educational Outreach.



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The Issues

Reasons for opposing the organic certification of hydroponics are compelling, heartfelt, and diverse. What follows is an analysis of the major reasons that there should be no USDA organic certification for hydroponic growing operations from the point of view of farmers who obtain and maintain USDA organic certification. By obtaining USDA organic certification, these farmers are vested in the integrity of the USDA organic label and in essence sustain NOP regulators.

Soil

The primary, foundational reason for excluding hydroponics from organics is that farming without soil cannot fully encompass the principles of organic farming and cannot yield the same outcomes as soil-based farming. The organic management of soils is a perpetual effort to improve soil health as well as the health of the crops and biological communities that soil hosts and interacts with. The traditional language of organic farming's founders and subsequent practitioners, as well as the language of the NOP, have framed this using terms like fertility, moisture storage, microflora, and parent materials. Collectively these traits also connect the soil to the broader farm environment—its water, biodiversity, susceptibility to erosion, and neighbors. At both small and large scales, these traits have been at the heart of organic requirements and inspections for certified organic farms. Historically and to this day, some farmers frame this collection of traits in visceral or even religious terms: "growing in soil is the way God intended farming to be." Some farmers may not be inclined to use that language in an argument with a regulator, but nevertheless humbly and vocally embrace the complexity of soil and grasp that we (both farmers and scientists) cannot fully disentangle the

variables and thereby mimic the effects of soil by engineering an aqueous system.

Nutritional Qualities of Food

The second major reason for excluding hydroponics from organics is soil, and its interactions, drive nutrient density. It is difficult to enter the scientific literature on soil, crops, livestock, or human health these days without encountering the burgeoning research on the microbiome—in all of those settings. In contemporary scientific terms, this means that considerations of crop and weed diversity, interacting roots and microbial communities, phytochemical signaling sometimes mediated by microbes, biochemical resilience enhanced by the cation exchange capacity of soils, and subtle micronutrients made available by mineral-microbe interactions, etc. are all relevant to crop growth and nutritional content. Do organic farmers claim to fully understand all this? No one does, but our understanding is growing increasingly sophisticated. It is telling us that our grandmothers' assessment that we are what we eat still holds, whether we are a tomato or a child. It defies logic that an engineered aqueous system injecting a set of selected chemicals in a simplified environment is growing nutritionally equivalent food, despite substantial similarities in appearance and composition.

Harmonization amongst International Certifiers

Europe, Canada, Mexico, and IFOAM (International Federation of Organic Agriculture Movements) all exclude hydroponics from organic certification, based on the premise that soil is fundamental to organic farming, by

definition. The NOP has created a contradictory standard for U.S. Farmers without an adequate rationale by certifying hydroponics operations.

Inconsistent and Ambiguous Certification within the U.S.

Not only is the NOP inconsistent with the international norms, but its standards are also inconsistent and ambiguous within the U. S. In 2014 when the NOP officially announced that hydroponic operations could be certified, a small but growing contingent of farmers began to ask, “if the NOP is certifying various containerized hydroponic production technologies in greenhouses and elsewhere, what does that look like, and how are they translating a soil-based standard to these engineered aqueous schemes?” Farmers who had been rallying and writing in opposition to the USDA directive based on their knowledge of and passion for soil-based farming expanded their muckraking to include questions about land transition requirements for containerized growing regimes. The ambiguities they uncovered led to a USDA memo in June 2019 that tried and failed to provide written clarification. This, in turn, led to OFA collaborating with National Organic Coalition (NOC) and Accredited Certifiers Association, Inc (ACA) to conduct a “Three-Year Transition Survey,” questioning 34 Certifiers on the protocols for a wide array of production technologies (see the timeline on page 27). The survey clearly demonstrated that standards for dozens of growing methods remain ambiguous and inconsistently certified across this country. In response, the ACA working group of over 30 certifiers met to remedy this inconsistency with guidance but could not agree without clarification from the NOP.

If failure to address the imperative for

clarity and consistency was merely due to bureaucratic oversights and missteps, we could clean up the flaws and move on. *We find ourselves asking instead, is the drive to certify hydroponics as organic a misguided effort to drive a square peg into a round hole—to the detriment of the entire organic framework?*

An Update on other Concerns

While many, if not most, certified organic farmers oppose certification of hydroponics, we do not dismiss other concerns within the organic community that need to be addressed. We just do not want to water down organics as an easy “solution” to these systemic problems.

- **Expand Organic:** An aspiration to “Expand Organics” is admirable, but not if we do so at the expense of a meaningful organic benchmark. Asserting that we must expand organics at all costs is not so different from the troubled history of conventional farming in which powerful forces have driven a single-minded metric of high yield--at the expense of soil, crop, livestock health, and farm profitability, and thus human well-being. Pandemic 2020 has put an exclamation point on that peril.
- **Increase Access to Organic Food:** The vibrant and important field of urban farming offers much promise for access to nutritious food and urban engagement in the vital role of farming in human society, but it is a false premise that this demands hydroponics’ certification. The task of ensuring healthy, clean soils at any scale in any setting is both a possible and vital aim of growing and learning about food. Indeed, this principle applies to any food desert, urban or rural.
- **Too Late to Change:** Some are asserting that “it would not be fair” for the NOP to change its policy, now that a billion-dollar hydroponics industry has grown with the assistance of the 2014 NOP’s permission’. The irony

A BRIEF HISTORY OF HYDROPONICS & ORGANICS

Hydroponics has not always been allowed in organic certification. Here's a brief history of the controversy.



Timeline courtesy Organic Farmers Association, Organic Voice, June 2021.

of this claim is not lost on those in the NOSB and organic community who warned that hydroponics' certification was problematic at its inception and would be challenged. Nor is it lost on the hundreds of soil-based organic and fruit and vegetable farmers whose livelihood is threatened (or already wrecked) by the tilted playing field that helps an industrial "organic" hydroponics industry to thrive under much less stringent standards.

- **The Organic Label is Valuable:** Some organic community members expressed concern that by criticizing the entire USDA organic label, the hydroponics "fight" was inadvertently undermining organic producers not directly vulnerable to hydroponic competition. This includes the small grains growers of the Great Plains and their food manufacturing partners, for example, as well as the diverse livestock-based organic sector and others. Members and leadership of the Real Organic Project (ROP) listened to these concerns and clarified its language to differentiate between its critiques of the NOP and its respect for a wide array of farmers who have come to rely on its organic program.

- **Organic Integrity Cuts Across Commodity:** Loss of integrity in the organic standard in any sector threatens the integrity and reputation in all sectors. Anyone who doubts that all organic farmers and consumers have a stake in the fate of organic integrity need only look to the current issues revolving around fraudulent organic grain imports, delays and limitations in reforming animal welfare provisions by the NOP, and corporate adoption of the regenerative farming rhetoric without rigorous safeguards against greenwashing. We misinterpret internal debates at our own peril and at the peril of an organic future for food and land. The ostensible

"benefits" of pseudo-organic accrue only to those who live by quarterly reports. Natural systems are the ultimate arbiter.

We do not seek a permanent alphabet soup of auxiliary labels. Consumers do not have the stomach, the budget, or the bandwidth to throw themselves into such a morass. Together with eaters, we seek instead to work with the USDA to reestablish an organic benchmark that is, at a minimum, honest and defensible and structured to seek continuous improvement. Individual farms and farm and consumer groups will continue to strive for and market innovations "Beyond Organic," but this only works if the foundation is solid.

MOA will continue its collaborations with other organizations to pursue exposure and practical modifications of existing policies to protect the fundamentals of organic farming. The next couple of years offer a crucial opportunity, with dynamic pressures on USDA, with Senator Jon Tester in the Capitol, MOA representation on the OFA Governing Council and the NOSB, as well as on the IFOAM North America Board, and a societal awakening to the coupling of healthy food, ecosystems, and economies.

-Becky Weed, MOA Chair

*For more information about the OFA Greenhouse Survey, contact OFA at 202-643-5363 or info@OrganicFarmersAssociation.org



MOA Announces 2021 Events!!

The MOA Farm Tour Committee and Conference Committee announce five in-person events for 2021.

June 9, Vilicus Farms Tour, North of Havre. Doug & Anna Crabtree-Jones - **REGISTRATION OPEN ON THE MOA WEBSITE.**

July 6, 4M Farms Tour, near Malta. Cliff & Anna Merriman

September, tbd, Bitterroot Farm Tour

October 26, Organic University, Havre, Northern Ag Research Center

December 2 - 4, MOA Annual Conference, The Commons, Bozeman. Speakers include Helen Attowe, permaculture expert; Tom Philpott, farmer, agriculture journalist, and author; and Wes Jackson, co-founder of the Land Institute.

After more than a year of social distancing, it will be great to once again meet in person. Details are still being worked out. Watch MOA's website and social media accounts for up-to-date information. MOA will follow public health guidelines and encourages wearing masks for the time being. Sponsorships are available. Contact moamembership@gmail.com for more information.



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United States Senate

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The Honorable Tom Vilsack
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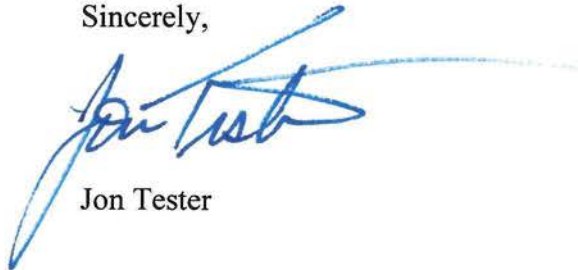
Secretary Vilsack:

I write today to urge you to swiftly implement the National Organic Standards Board's (NOSB) recent policy recommendations. The NOSB crafts its recommendations by gathering substantial public input from a wide-array of stakeholders and consulting with experts. This collaborative process driven by public input is vital to consumer confidence in the organic label. That's why I ask that you prioritize implementing NOSB recommendations as you begin your work at USDA.

Over the last decade, the NOSB has made many recommendations to improve the organic agriculture industry. These rules range from strengthening certified organic seed usage to livestock transitioning and represent collaborative efforts between producers, processors, ecologists, and business owners. Several of these important recommendations have been put on hold, reversed by the Trump Administration, or are moving through the rulemaking process at a glacial pace. For example, the Strengthen Organic Enforcement Rule will protect organic producers from fraudulent products both domestically and internationally. This will help grow the organic agriculture industry and support economic growth in Montana communities.

I urge you to review all of the NOSB's outstanding recommendations and finalize these critical rules. I stand ready to work with you to support all of Montana's farmers. Thank you for your consideration.

Sincerely,



Jon Tester

Mountain West Grazing Connection Website Launched

By Devon Ragen



Are you ready to take advantage of all of the benefits of livestock integration?

Through a collaborative effort between NCAT, Montana State University, and a WSARE research grant, a new website has been launched. The Mountain West Grazing Connection website is a place where livestock and land-owners across the Intermountain West region can find and connect with each other.

The Mountain West Grazing Connection was created as a tool to help match landowners with livestock owners in order to establish mutually beneficial relationships. By cultivating these partnerships, farmers don't have to be ranchers and ranchers don't have to be farmers.

The site is free to use and setting up an account is fast and simple. You can add a listing for available grazing land or livestock in Montana, Idaho, Wyoming and Utah. The website has resources to help you get started integrating livestock into your operation (ex. Writing a grazing contract, fencing solutions, water sources, etc.) as well as real-life success stories from farmers and ranchers that are making livestock integration work for them.

While Montana's population has steadily increased, pasture and cropland has decreased by over 2.5 million acres in less than 10 years (with other states following similar trends.) Over the last decade, 18 million acres of ranch and farmland in the United States has shifted to other uses. Prior to World War II, farms were small and diversified, incorporating livestock and several crops. Currently, most farms are large scale, highly specialized, and focus on low diversity. As the agricultural landscape continues to transform, farmers are starting to look for ways to re-integrate livestock into cropland to take advantage of the numerous benefits.

Livestock integration can enhance nutrient cycling, reduce inputs such as fertilizer and herbicides, lessen fire fuels reducing the risk of catastrophic wildfires, add microbes to the soil, increase soil organic matter, boost carbon sequestration, and improve crop yields and soil quality.

If you have been on the fence about integrating livestock into your operation, whether it's by grazing cover crops, crop aftermath, or weed management, this is a great opportunity to establish relationships with ranchers and break ground.

Please check out Mountain West Grazing Connection and help spread the word.

www.mountainwestgrazing.com

Devon Ragen is a Research Associate in the department of Animal and Range Sciences at Montana State University and the principal investigator of the WSARE research project "Integrating Livestock into Cropping Systems and the Impacts on Soil Health" (SW17-080).

MOA Policy Proposal Submission Process

As a trade association, part of MOA's mission is to lobby for issues relevant to organic. The MOA Policy Sub-Committee has been busy since the start of the year refining procedures, documenting passed resolutions, and publicizing its positions and processes.

Co-chaired by Doug Crabtree and Nate Powell-Palm, the committee has established guidelines for submitting policy proposals for consideration of adoption by the MOA membership at the annual meeting. In the recent past, the Policy Sub-Committee has striven to move pro-posals forward, only to learn that membership frequently did not have enough information to pass a resolution.

It is hoped that with 90-days lead time before the December meeting, MOA can provide sufficient background information for a given proposal so that the membership is well-informed about the issues put before the membership. The proposals will be published in October in the Organic Matters Fall Issue. Proposals should be submitted by

September 6, 2021 via the MOA website.

All MOA members are welcome to attend Policy Sub-Committee members. Contact moamembership@gmail.com for more information about attending.

To view the complete list of MOA Policy Positions, visit the MOA website.

www.montanaorganicassociation.org

Schahczenski Elected to IFOAM North America Board

IFOAM (International Federation of Organic Agriculture Movements) - Organics International was founded in 1972 in France. Past MOA Board Member, active MOA Committee member, and longtime friend of organic agriculture, **Jeff Schahczenski** has been elected to the IFOAM North America Board. IFOAM was founded in France in 1972 and has a mission to, "Lead, unite and assist the organic movement in its full diversity." and a vision of the "worldwide adoption of ecologically, socially and economically sound systems, based on the **Principles of Organic Agriculture**".

IFOAM - NA was founded in 2016. Its board includes MOA members and friends Margaret Scoles (Treasurer), Marla Carlson (Co-President), and Alison Squires. MOA is an organizational member of IFOAM-NA.

Jeff is an Agricultural and Natural Resource Economist with NCAT-ATTRA. His work includes the publication of studies and education on crop insurance, national agriculture public policy, transgenics, blockchain, soil health, and climate disruption. He served in leadership roles with the National Sustainable Agriculture Coalition and other agriculture and conservation NGOs. Jeff worked for Rutgers University and served in the Peace Corps in Belize. Jeff worked many summers on his grandfather's dairy farm in Wisconsin. In 1991 he moved to Montana and built his own straw bale house and greenhouse in Montana.



Montana Organic Association

is a 501 (c) 6 non-profit organization dedicated to advocating and promoting organic agriculture for the highest good of the people, the environment and the State economy.

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Organic Matters occasionally includes guest articles and opinions. While we review these for relevance to our mission, the opinions in these articles may not reflect the opinions or policy of the Montana Organic Association.

Editor: Jamie Ryan Lockman

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The Montana Organic Association (MOA) brings together people, businesses, organizations, and agencies who are working to develop Montana's organic industry. MOA is proud of its legacy that has led Montana to be a national leader in organic production. But MOA is more than organic production; it also serves to educate about organic products including food, fiber, and non-food items like personal care items and household supplies, and ways to limit the use of chemicals in everyday life. MOA also advocates for policies that protect the environment, promote healthy living, and support individuals, farms and businesses who are actively engaged in developing sustainable businesses and communities. MOA accomplishes this through hosting events, serving as an educational resource, providing network opportunities, and communications.

Do you want to support MOA's work?

MOA has several affordable membership options. Visit the MOA website to learn more.

www.montanaorganicassociation.org

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We are designing a study to compare regenerative and conventional cropping systems in the Northern Great Plains region. The study will explore the impacts of regenerative principles and practices used to **improve soil health, reduce input costs, sequester carbon, and gain access to high value markets.**

We are mainly looking for established practitioners of regenerative management (5+ years), but there will be opportunities for new adopters to be involved as well. Additionally, we are looking for neighboring producers with similar soil type and land use history who use conventional practices (mechanical tillage, summer fallow, heavy use of synthetic additives, and/or lower diversity of cropping) for comparison purposes.

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- 2) *Maximizing crop diversity*
- 3) *Keeping the soil covered*
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- 5) *Integrating livestock into crop systems*
- 6) *Adaptable, ecosystem specific management*

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- Opportunity to highlight the benefits of your practices, including acknowledgement in publications and option for co-authorship



If you would like to be involved in our study or would like more information, please email Ellie Ellis at ellie.ellis@colostate.edu.



Ellie Ellis, PhD Student
FFAR Fellow, InTERFEWS Trainee
Colorado State University



MOA has a YouTube Channel!

This year, MOA had a virtual field tour and needed a place to post the videos. Thus, MOA gained a YouTube Channel.

In addition to videos of the farm tour at Mark and Jane Smith's Aspen Island Ranch, you'll find recorded presentations from this Fall.

Make sure to subscribe to the MOA Channel to stay up-to-date with the latest videos.

Do you have a video you'd like to share on the channel? Let's do it! Reach out to Jamie at moamembership@gmail.com

Click [Montana Organic Association YouTube Channel](#) here to connect to MOA's videos.

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[The Montana Organic Box](#) includes Organic Hot Fudge Sauce from [King's Cupboard](#) (Red Lodge), [Organic Kracklin' Kamut®](#) from Big Sandy Organics (Big Sandy), Organic Raw Oatmeal from [Montana Gluten Free](#) (Belgrade), Organic Petite Crimson Lentils from [Timeless Seeds](#) (Ulm), Organic Cherry Jam from [The Orchard at Flathead Lake](#) (Bigfork), and Big Sky Organic Coffee from [Hunter Bay Coffee Roasters](#) (Lolo).



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A New Chapter for Montana's Organic Community: Announcing Organic Montana!

Jamie Ryan Lockman, Executive Director

When the Montana Organic Association was being established beginning in about 2003, the founders intended to be a 501 (c) 3 nonprofit. The IRS determined otherwise and decided that the proposed organization, focusing on policy issues affecting organic agriculture and food, was better defined as a 501 (c) 6 trade association. Since that time, MOA has carried forward and done great work relying on membership fees, conference and event fees, sponsorship fees, and government grants to fund it. This work has included lobbying lawmakers through letters and fly-ins, taking positions on issues, and developing policy positions. It has also engaged in separate work from these policy-focused activities that don't fall under the trade association definition. MOA has been involved in that falls under 501 (c) 3 definitions, including providing education, hosting the Organic University workshop and farm tours, supporting students, and providing entertainment and enrichment to members.

MOA has established a 501 (c) 3 nonprofit called Organic Montana. This organization does not have a "membership" like MOA, but rather MOA is the only "member." A board governs OM, with me serving as Executive Director. OM will begin taking on MOA's more properly nonprofit educational and community-building activities. OM can derive funding from private foundations, donations, and other fundraising activities that MOA cannot do. It can also receive discounts on fees to help it operate at a lower cost, such as reduced mailing rates, and take advantage of technology discounts. Any contributions made to OM will be deductible as charitable donations.

What does this new organization mean for MOA? It means that MOA will continue to focus its efforts on policy and lobbying as the initial

founders intended.

This status means that legislators at the state and federal levels hear from MOA and value the membership's voice. MOA started this more intentional work last year by passing 13 policy positions in one year, doubling the number it had approved since its founding. MOA can fully participate in groups like the Grow Montana, a statewide coalition that joins more than twenty organizations supporting sustainable food and ag legislation. Grow Montana hired a lobbyist to represent the coalition's interests in this Montana legislative session, an action that amplifies MOA membership's positions and concerns. MOA will continue to participate in the Organic Trade Association, National Sustainable Agriculture Coalition, Organic Farmers Association, National Organic Coalition, and other industry policy-influencing organizations.

OM will slowly take on MOA's educational programs and community-building work as it establishes itself. This work includes developing a budget, raising funds, designing a website, and refining its message and identity. Immediately, it will raise funds and cohost those MOA activities that do not include specific policy work.

OM board members include those who currently sit on MOA's Board as well as the Organic Advisory and Education Council (OAEC) board: Sam Schmidt, Chair (MOA, OAEC); Wes Henthorne, Vice Chair (OAEC); John Wicks, Treasurer (MOA); Jennifer Dees, Secretary; Jonda Crosby; Georgana Webster; and Becky Weed (MOA).





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