

# VEGETABLE FARMER'S GUIDE TO ORGANIC CERTIFICATION



#### **VEGETABLE FARMER'S GUIDE TO ORGANIC CERTIFICATION**

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# PREFACE

#### Dear Reader,

There is a trend among young and beginning farmers to opt out of organic certification, even when they grow using organic methods.

There are many paths to success in farming and many ways to communicate the value of your product and production methods, but by skipping USDA certification some farmers may be missing a valuable marketing opportunity. This guide is intended to help you understand the advantages of certifying your farm and the steps to making it happen.

I have been both an uncertified and a certified farmer. My first three seasons farming were on leased land. An application of urea the fall before we started renting meant the land wasn't eligible for certification until three years had passed from the date the fertilizer was spread.

I spent those first three years giving a lot of long-winded answers to customers about why we weren't certified and explaining how we did grow. I know first-hand that most customers will accept the answer "we grow using organic methods," but I also know how much easier and fulfilling it is to be able to simply say "we are certified organic."

We became certified at the start of our fourth season when we bought our own farm. At first, being certified felt like a bonus—a helpful way of communicating our farm's actions and priorities. Over time, certification has come to be the backbone of our operation. We like that customers can trust the standards and annual verification of our methods of production. We are proud to be part of a commitment to organics.

NYFC asked me to write this guide to give growers in their network an accessible and easy entry point for certification. It is divided into five parts; why farmers fought for organic, concerns and benefits, steps toward certification, record-keeping, and marketing strategies. An appendix provides resources for organic vegetable seeds, cover crop seeds, transplants, potatoes and garlic, and amendments and inputs. We hope you will use it to get questions answered and hopefully, to get certified.

Sincerely,

Emily Oakley

THIS GUIDE IS INTENDED TO HELP YOU UNDERSTAND THE ADVANTAGES OF CERTIFYING YOUR FARM AND THE STEPS TO MAKING IT HAPPEN.

# INTRODUCTION

Do you think of yourself as an organic farmer? Do you farm using organic methods but have passed up certification fearing a mountain of paperwork and fees your young operation can't afford? Do you feel there's no need to fix what isn't broken; your customers know and appreciate how you grow, and you don't need a certificate to prove that? Are you considering certification, but you're unsure of where to start?

If you answered yes to any of these questions, this guide is for you. If you aren't certified, you're not alone. Although a majority of young farmers in the National Young Farmers Coalition's network report that they grow using organic practices, very few are actually certified. <u>This guide is meant for any vegetable farmer who embraces the</u> <u>philosophy and practices of organic agriculture, but isn't yet certified.</u> It hopes to tackle some of the challenges to certification and persuade more young farmers of the benefits it brings. It will address the history of federal organic certification, and it will walk you through the steps—from finding a certifying agency, to setting up easy record-keeping procedures.

Certification is a valuable tool for your business. It quickly and easily illustrates your farm's growing practices and philosophy to customers. Once you work through the initial application process and become familiar with the standards, you will find annual renewal to be surprisingly clear-cut. Certification will become an integral part of your farm's reputation and your identity as a grower.



# WHY FARMERS FOUGHT FOR ORGANIC

# HOW WE GOT HERE: CERTIFICATION AND THE USDA NATIONAL ORGANIC PROGRAM

Organic farming has deep roots, but the robust industry of today largely grew out of the efforts of the 1960's and 70's generation of back-to-the-land farmers. They worked to create a demand for their products by educating consumers about the environmental and health benefits. What was at first a limited and niche market, evolved through passion and persistence into the thriving marketplace it is now.

As the movement expanded, the need for universal standards and third party certification arose. The meaning of organic could easily vary from farmer to farmer, and it did. The first certification entities were established in the early 1970's. As organic farming continued to mature, so did the case for creating a national definition of the word "organic." Organic certification spread over much of the country during the 1970's and 80's, but the regulations were not the same from one certifying entity to the next. Plus, without government oversight, there was no way to protect against fraudulent use. The Organic Food Production Act of 1990 (OFPA) was largely the result of farmer and consumer demand for the development and enforcement of organic standards that were the same regardless of state, certifying entity, or individual grower.

As a result of that legislation, the initial attempt at federal standards was presented for public comment in 1997. Farmers and consumers roundly rejected them and asked for tighter controls. The backlash centered on proposed permission for the use of sewage sludge, food irradiation, and GMO's. Over 275,000 signatures were presented to the USDA demanding stricter standards (Kuepper 2010). It was perhaps the greatest public feedback the USDA had received up to that point. The calls were heard and the standards improved. By the time the revised draft was released in 2000, the standards largely reflected the goals and values of the movement. In 2001, the National Organic Program (NOP) was created, and since October 2002 this office of the USDA has administered all organic certification and labeling. Today, all certifying entities are accredited by the NOP and are regularly monitored and audited to ensure appropriate interpretation and enforcement of the regulations.

#### DIGGING DEEPER: HOW TO LEARN MORE ABOUT OFPA, NOP, & ORGANICS

- If you want to check out the details of the OFPA legislation: ams.usda.gov
- To see who is on the National Organic Standards Board and read about their committee assignments: ams.usda.gov
- To learn more about the history of organics and the creation of the certification: kerrcenter.com/publications/organic-philosophy-report.pdf
- To peruse the most up-to-date NOP Final Rule in the Federal Register: ecfr.gov

### **CERTIFICATION DEFINED AND DEMYSTIFIED**

The NOP Final Rule defines organic production as "a system that is managed... to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity." Certification has three pillars—a universal definition of organic, regulations on production, and enforcement of the standards. The certification process is straightforward: it involves an initial application and farm inspection, followed by a similar but less extensive yearly renewal. Any organic farmer will tell you being organic is less about what can't be used and more about holistic farm management, and certification is about more than just a label. Organic certification is a process that takes the grower through a comprehensive assessment of the farm operation. This occurs through the Organic System Plan and through subsequent annual inspections.

The NOP provides guidelines for the materials and methods of production and establishes a record-keeping paper trail for documentation and verification. A 15-member National Organic Standards Board (NOSB)—comprised of four farmers, three environmentalists, three consumer advocates, two processors, one retailer, one scientist, and one certifying agency—is appointed by the Secretary of Agriculture to advise the NOP on the standards and to determine the National List of materials permitted and prohibited in production. The Final Rule for production spells out the standards and is published and regularly updated in the Federal Register.

#### WHAT'S IN A NAME? WHY CERTIFIED ORGANIC MATTERS

Shopping for local food at a farmers' market, through a CSA, or at a natural foods grocery store is partly about the products and partly about the experience.

Customers inherently want to trust their local farmers, but few engage farmers in the details of their agricultural practices. Most shoppers don't have time for long explanations and likely won't be familiar with the complexity of organic farming systems, but they do have trust in the certification process and USDA seal.

The proliferation of descriptors—no spray, natural, beyond organic—can make it difficult for the average consumer to differentiate between growing practices. These unregulated definitions can and do differ widely between users. Even those who say they grow using organic methods are relying on the NOP standards as a reference point for what organic means.

Hundreds of small farmers gave time and feedback to the NOP to make sure the standards protect organic values and consumers. When young farmers opt out of certification, some of the movement's potential is weakened. If you are growing organically according to the NOP, certifying your farm goes a long way toward giving customers a recognized brand for your produce. Publicly pledging your farm to the national standards through certification ensures they remain robust and relevant for the next generation of young farmers.

#### **ALTERNATIVE CERTIFICATION**

For a variety of reasons, some farmers choose to communicate good production methods through alternative certification. Certified Naturally Grown and Certified Biodynamic are two such alternatives.

#### **Certified Naturally Grown**

Certified Naturally Grown is a well-know option for alternative certification, based on the NOP standards. Members are peer certified through farmer-to-farmer inspections. As part of the certification process, each farmer agrees to inspect another farm each year. There is a minimum annual membership fee of \$110 for produce, with a recommended payment of \$125-200. Beginning farmers can access a scholarship fund to help defray costs, with priority given (among other criteria) to farmers in their first three years of farming.

The certification steps are:

- 1. Complete an online certification application
- 2. Pay membership dues, which can be made over time
- 3. Sign a declaration form
- 4. Arrange your own on-farm inspection
- 5. Conduct an annual inspection of another farm

To learn more, visit naturallygrown.org.

#### Biodynamic

Certified by the Demeter Association, Inc. and Stellar Certification Services, Biodynamic farms follow the NOP certified organic production standards as well as Biodynamic guidelines for a "closed system" with limited use of off-farm materials. Biodynamic preparations are used in field sprays and compost inoculants for plant and soil health. Because the NOP guidelines are used as a baseline, certified Biodynamic farms can get joint NOP and Biodynamic certification with the same application fee and inspection.

The certification steps are:

- 1. Request and complete a Certification Pack
- 2. A farm visit is arranged with Demeter
- 3. Review of the farm inspector's report and the grower's application by members of the Evaluation Circle
- If granted certification, the grower agrees to implement any recommended actions or requirements. Once certification is granted, an annual renewal application and inspection are completed.

To learn more, visit demeter-usa.org.

# **EXPERIENCE SPEAKS**



## KATIE KRAEMER PITRE | TECOLOTE FARM, TX tecolotefarm.net

#### Certified since 1994 by Texas Department of Agriculture

While our CSA customers know and trust us through 20 years of experience and interaction, it is important to many farmers' market customers and retail outlets (co-ops, 3rd party delivery services) to have the label "Certified Organic." Some customers at the market want a quick answer to the question, "Are you organic?," and they want a yes or a no. If we weren't certified, it would take a little more time to explain, "Well, we were for 20 years but dropped it because our application is 160-some pages long, and our certifying agent is under-funded so inspections can get gravely delayed."

We believe in growing beyond the requirements of the organic program, and understand why consumers would like a label that has a real certifying agent behind it. The term "sustainable" is used so loosely that it comes to mean very little for consumers. There's a joke amongst organic farmers that sustainable farms only use chemicals when they need them. I know plenty of very honest farmers using organic methods without getting certified, but for us, it's a matter of having a brand that our customers respect.

#### JACK HEDIN FEATHERSTONE FARM, MN featherstonefarm.com

**Certified since 1997 by Midwest Organic Services Association** While organic certification is not the final measure of sustainable farming practices, it is important to Featherstone to be certified. Organic certification holds all farmers accountable to organic production

standards, levels the playing field, and minimizes unethical claims by farmers who would like the price increase "natural" production can bring without committing to the actual work of organic farming. Organic certification is also critical for our retail customers who need a clear, 3rd party certified means of communicating with their customers about the farming practices behind the product.



#### JUDITH REDMOND FULLY BELLY FARM, CA fullbellyfarm.com

**Certified since 1985 by California Certified Organic Farmers** Participating in the organic certification program gives Full Belly Farm a baseline above which we always strive to perform. The fundamental principles of Organic Farming are reflected in the certification

process and when those principals are under fire (as they are with new food safety regulations), the public and farming community can rally around. Having a definition of "organic" provides a focus for discussion and progress both on the farm and in the good food and farming movement.



### OVERCOMING SOME COMMON CONCERNS

The barriers to certification that most young farmers express are cost, paperwork, and a philosophical aversion to federal participation in certification. It's true that applying for certification, maintaining good farm records, and paying an annual fee requires an investment of time and money; however, the commitment is generally less burdensome than many anticipate.



# - CERTIFICATION COSTS TOO MUCH

It's not free, but you may be surprised by how affordable it is. If you view the certification fee as just another essential cost of doing business, much like seeds, potting soil, or tractor fuel, it can be factored into your annual budget and the price of your produce. The fees vary by certifying agency, but in general the fees for a small farmer are around \$1,000 per year (McEvoy 2013). Certification opens up doors to new outlets, particularly wholesale opportunities, which can make the fees pay for themselves. It paves the way for future business opportunities and growth potential.

Some certifiers charge based on location, size of the operation, or income, while others offer a flat fee. For example, it can be as little as \$200 for farms up to 25 acres certified by the Oklahoma Department of Agriculture where the cost is partially subsidized by the state. The Rhode Island Department of Environmental Management charges a flat rate of \$200 per producer. The Ohio Ecological Food and Farm Association's fees are based on region and date the application is received, charging an early bird rate of \$850 for Ohio residents, \$950 for growers in the region, and \$1,000 for out-of-region producers. Estimated rates at Quality Certification Services, the certification program of Florida Certified Organic Growers and Consumers, are \$700 up to 2 acres, \$950 up to 5 acres, \$1,100 up to 10 acres, and \$1,200 or \$1,300 up to 20 acres. They certify growers in 37 states. Shopping around can help you find the best deal for your farm.

# **2.** THERE'S A PAPERWORK OVERLOAD

Good farm management calls for solid record-keeping regardless of the decision to be certified. Certification records are those any farm business will want to keep track of—things like soil tests, crops and varieties grown, and sales volume. Although most farmers are honest, the reason for the paperwork is verification. Records maintain organic integrity and provide for the necessary audit trail from farm to market. They also help certifiers examine your inputs and practices to make sure they are approved. Record-keeping doesn't have to be fancy or complex. Denise Aguero at Quality Certification Services reports that they receive handwritten notes and applications from Amish dairy farmers in the Midwest. The point is not to burden the farmer but to uphold the organic standard.

# **3.** FEDERAL ADMINISTRATION CAN LEAD TO AN EROSION OF STANDARDS

From time to time, organics makes news during disagreement over proposed changes to the standards.<sup>1</sup> Even when this occurs, the democratic nature of the process allows the public to be at the forefront of shaping policy by making sure their voices are heard. There is robust input through the National Organic Standards Board. Miles McEvoy, Deputy Administrator of the NOP explains that USDA listens to all sectors of the organic community when they are formulating rules or policy. He states that it is extremely important to develop rules and policies that are practical for small farmers.

The NOP standards have always been good for crop production. As Atina Diffley, an organic farmer and consultant, activist, and author in Minnesota says, "The standards aren't perfect, but they are good. Organic certification is the highest standard for a USDA food label we have in this country."

1. There are recent controversies—i.e. authorizing additives in processed organic foods—that remain open debates, but rarely, if ever, do they involve the standards for crop production.

"Just because the government is involved doesn't make it a bad thing. One of the original ideas behind farmers asking the government to be involved in certification was to keep the process democratic and maintain a level playing field for smaller growers against big business interests."

-LIANA HOODES, EXECUTIVE DIRECTOR OF THE NATIONAL ORGANIC COALITION



"This is a marketing program. Farmers are paying for the ability to use the USDA Organic claim and logo, the most respected in the world. They're paying for a third party to verify their compliance so that they may receive a premium on their produce for it."

-DENISE AGUERO OF QUALITY CERTIFICATION SERVICES

# **4.** WHY SHOULD WE HAVE TO PAY MONEY FOR DOING THE RIGHT THING?

Fees for certification cover the cost of reviewing the application, sending an inspector to your farm, reviewing the inspector's report, and the general business infrastructure of your certifier. While the NOP does not specify how much a farmer can be charged, the Final Rule does state that fees must be reasonable.

Up until this year, the Farm Bill provided for a federal cost-share program that reimbursed growers up to 75% of the certification cost. In 2013, due to limited appropriation, growers in 16 selected states were eligible to participate in the cost share program (the 12 Northeast states plus HI, NV, UT, and WY). The future of the cost-share program relies, in large part, on Congress hearing from constituents who have been satisfied recipients of the program or those who wish to be.

# **5.** I GROW USING ORGANIC METHODS, SO WHY DO I NEED TO BOTHER WITH CERTIFICATION?

Growers using organic methods might not adhere fully to the NOP and not even realize it. Miles McEvoy, of the NOP, explains that "some people think they know the organic standards, but unless they've been inspected and certified there is no assurance that they comply with all of the organic requirements that support a biologically intensive farming system."

To say you "grow using organic methods" implies understanding and compliance with the provisions of the NOP law, such as using organic seeds and planting stock and only materials that are permitted according to the National List. If you're doing all of that, getting certified will be clear-cut.



# **6.** SOME OF THE REQUIREMENTS ARE TOO STEEP, LIKE MANDATING ORGANIC SEEDS WHEN AVAILABLE

Certification is about more than not spraying chemicals on your own farm. It's about supporting the organic movement as a whole and what happens on other farms. Through purchases of inputs like organic seeds and plants, certified farms help limit the pesticides being sprayed in the wider environment.

Some who aren't certified protest the higher costs of organic seeds. Although organic seeds are more expensive, there are compelling reasons to support the organic seed industry. Pesticide use is often increased on conventional seed crops as they are in the ground over an extended season for maturation and because they are not intended for human consumption.

Others complain about the lack of locally-sourced organic cover crop seed. The only way to increase access to local organic seed is to create a demand for it. In the meantime, buying seed from companies closest to you makes shipping to most places reasonable.

# **7.** EXCEPTIONS TO THE RULE

There are instances when certification may not be practical, for example, if your farm is surrounded by conventional growers, leaving you with an insufficient buffer zone. If you are on leased land with the expectation of a quick move, making the investment might not make sense. A farm in an isolated area in a state with poor access to certification might find that in that rare situation, certification could be cost-prohibitive. If this is the case, you can always familiarize yourself with the regulations to ensure you are truly meeting the standards.

# CAPTURING THE BENEFITS: 6 COMPELLING REASONS FOR CERTIFICATION

## **1.** PROVIDES A UNIVERSAL, ENFORCED STANDARD

Beyond outlining a framework for organic production, certification is the only legal way to verify organic claims. Without it, organic could mean anything anybody wanted it to, taking us back to pre-certification days and undermining the term. Organic certification protects farmers against co-option of the ideals they work for.

## **2.** COMMUNICATES TO CONSUMERS

Using the organic seal is a strong visual message telling customers you meet the highest standard for organics. There is a growing marketplace of savvy customers who only want to purchase certified organic food. Advertising the USDA seal speaks their language.

## **3.** IMMEDIATE CREDIBILITY WITH NEW CUSTOMERS

Some customers aren't patient enough to wait for the explanation that attends no certification. Plus, they don't know you yet, and it can take time to build up trust, time during which they may find a grower who is certified from whom to buy.

## 4. EASE OF MARKETING AND PRODUCT IDENTITY

Certification provides a single word reply to the question "Are you organic?" Yes.

## **5.** PRICES

This is especially important in wholesaling, but it can also be key to justifying the slightly higher prices that can come with the increased manual labor and other expenses of organics.

## **6.** CERTIFICATION MEANS BEING COUNTED

The organic industry is measured by the number of farms that are certified. Those who are organic but not certified don't get formally counted as being part of the movement. Atina Diffely explains that "certification formalizes farmer's commitment to the practice. It's not just about your place in the market or career dreams. Certification is part of the commitment."

"In order to support and grow the organic industry, it's important to note that it's the number of certified farms that is often used in determining funding, research, and policy decisions. Not being certified takes away a level of visibility since you're not represented as being a part of the greater movement."

-DENISE AGUERO OF QUALITY CERTIFICATION SERVICES

"There are 2.2 million farmers in the US, and right now only 13,000 are certified organic. That's less than 1%. How can we expect the USDA to take us seriously and create policy and research and other support to move organic into the mainstream if we aren't counted?"

-ATINA DIFFLEY, AN ORGANIC FARMER AND CONSULTANT, ACTIVIST, AND AUTHOR IN MINNESOTA

"Certified organic farmers who know and uphold the standards well keep intact the argument for strong standards. If more and more farmers choose not to certify, it will degrade the meaning of organic."

-LIANA HOODES, EXECUTIVE DIRECTOR OF THE NATIONAL ORGANIC COALITION





# **3.** STEPS TOWARD CERTIFICATION

Once you've taken the plunge from thinking about getting certified to deciding to go for it, you will follow the steps outlined in this section. Many certifiers have their own guides to certification, as do some state cooperative extension services. ATTRA and the NOP are both great reference points, and links to their guides follow.



#### THE BASIC ELEMENTS

The key ingredients for organic certification are pretty straightforward, and you're probably already doing most of them. Taken together, these practices and the documentation of them comprise your **Organic System Plan**.

## Three years without the use of any **prohibited substances**

Sufficient **buffer zone** between your operation and any conventional farming practices or neighbors (the law doesn't specify the size or manner of creating a buffer zone, leaving it up to individual certifying agencies to create specific rules)

Maintain or build **soil organic matter** and health; guard against erosion

Sound **fertility management** through cover crops, compost, manure, and utilization of crop rotations

Prevention of **soil or groundwater leaching** and pollution from fertility treatments and amendments **Raw manure** must be applied 120 days prior to the harvest of crops that touch the ground and 90 days prior to crops that don't

**Compost** containing manure should be fully composted according to NOP rules

Use of **organic seed** when available; must document that you looked through multiple sources for organic; must use organic seeds for edible sprouts

No treated seed, even if that means using a different variety

Must use **organic transplants** (unless a temporary variance is granted)

Non-organic **planting stock** can only be used if organic is unavailable and as long as it has not been treated with prohibited substances

**Organic planting stock** can only be sold as such after a year of organic management

**Disease and pest prevention** through diversity, cultural practices, and manual control

Mechanical **weed control** through tillage, flame weeding, mulch, grazing

Use of **approved substances** only when preventative measures don't work

No use of **treated lumber** in a growing medium

Equipment used in both organic and non-organic systems must be cleaned between use

No **GMO** seeds or products

No irradiation or sewer sludge

It goes without saying, but no use of **prohibited substances**<sup>2</sup>

<sup>2.</sup> The only synthetic substances approved for organic crop applications are listed in the National List. "Organic" pesticides and fertilizers must also meet the NOP criteria. If a product has the OMRI seal or is OMRI listed, it is approved for organic use. If it doesn't, it may still be eligible, but check with your certifier first.



## WHAT INFORMATION A CERTIFIER WILL WANT FROM YOU

The directives certifiers are enforcing are the same, but how each entity chooses to do that varies. Some will want more information and paperwork upfront while others will ask for it during the on-farm inspection. Your initial application should serve as your **Organic System Plan**. The exact length will vary depending on the certifier, but it could be as little as 10-30 pages and take about half a day to fill out for a small vegetable farm. This may sound like a chunk of time, but it is no different from time you would invest in repairing a fence, buying a new implement, or harvesting produce.

If you aren't asked to provide a soil test, your certifying agency will take one. If you are on new land that has not had any prohibited substances applied by the previous users in the past three years, you can request they provide you with an affidavit attesting to that. Your certifier will also fill out an inspection form during farm visits and ask additional questions confirming your operation meets the standards.

Here's a list of the information most certifiers will want in your initial application/Organic System Plan:

Type of operation	Year each field was put into operation
Physical address	Existence of any mixed organic/
Number of acres	conventional production or handling
Irrigation source	Field planting schedule and how crops have been or will be rotated
A field map (which can be drawn out by hand) 	Fertility application records and a plan for monitoring fertility
Seeds and transplant sources	

Soil building program and the use of soil testing, cover crops, tillage, etc.

Pest observations and monitoring; control measures and applications

#### Weed control methods

Contamination prevention plan (especially important if you use equipment or materials from a non-organic farm) Crop storage, post-harvest handling, and any pest prevention measures

Volume of sales





#### **NEED MORE INFO?** ADDITIONAL GUIDES TO ORGANIC CERTIFICATION

A proliferation of guides exists addressing the certification procedures in detail, and there's no need to reinvent the wheel. Here are a few key guides:

- The NOP has an 8-page document called "Five Steps to Organic Certification" outlining overall procedures: ams.usda.gov
- ATTRA has a host of publications for organic certification at attra.ncat.org. Four that stand out are:
  - Organic Certification of Farms and Businesses Producing Agricultural Products: A 7-page guide giving an overview to the certification process
  - *Guide for Organic Crop Producers:* A whopping 64 pages of information. If you look this over, you'll find the answer to just about any question you might have. Don't be intimidated by the length; a helpful Table of Contents can take you to the pages covering the issues you want to read about.
  - Organic Standards for Crop Production: Excerpts of USDA's National Organic Program Regulations: Just like it says, this guide takes the Final Rule of the Federal Register and excerpts just those sections that are relevant to vegetable production.
  - Organic System Plans: Market Farms and Greenhouses: A (long!) sample plan with forms filled in as if this were a working market farm applying for certification. It represents an operation more complicated than most young farmers will have, but if you want to see an example to get an idea of how to fill out your initial application, it can be an interesting reference.

## VISIT YOUNGFARMERS.ORG/ ORGANIC for a full list of resource links.

### FINDING A CERTIFYING AGENCY

Who certifies your farm will depend largely on where you live. The NOP maintains a current list of accredited certifying agencies on their website. There are 84 authorized certifiers, 49 of which are based in the US. They comprise state departments of agriculture, farmer associations, and private companies. The NOP lists all certifying agents who have recently certified in your state (ams.usda.gov). Farmers in every state have several certifiers from which to choose. In states with large agricultural economies, there can be over a dozen options (there are as many as 29 in California). Ask for estimates from all of them to help compare rates. All certifiers are required to provide an estimate of services. Some list this upfront on their website, and with others you must request one. If you aren't sure who to pick and costs are basically the same, your best bet is talking to other certified growers in your area. If you don't know any, go to the NOP website and search for organic farms in your state (apps.ams.usda.gov/nop).

Many private certifiers serve a broad geographic spectrum. They do this through regional offices and through independent contractor inspectors who are trained by the International Organic Inspectors Association. Often, independent contract inspectors will work for multiple agencies and can bundle inspections in a general region to defray transportation costs and inspection fees. Most certifying agencies are members of the Accredited Certifiers Agency, a trade association with the goal of promoting the industry. As members they discuss how to interpret the regulations and make recommendations to the NOP.

#### **5 STEPS TO GETTING APPROVED**

#### 1. APPLY

- If you have a slow or off-season, that's the best time to work on your application. It will also mean your annual renewal will occur at a time of year when you are best able to deal with it.
- Once you've selected a certifier, call to arrange an informational meeting to discuss your growing
  practices, how the NOP standards affect your operation and that agency's particular record-keeping
  requirements and review procedure. Be sure to find out how to get questions answered during the
  growing season. How do they field calls? Who will you email or call, and what is the response time?
- Next, ask to have an application sent to you. Once you receive it, look it over, take a first pass at filling it in, highlight any items or sections you aren't clear on, and give your certifier a call to help you fill out question areas.

#### **2. APPLICATION REVIEW**

 Once you've completed the application, mail it in along with your payment. You will receive a call or an email from the certifier to arrange a farm visit.

## **ON-SITE INSPECTION**

During the initial and renewal farm visits, your certifier will want to get a comprehensive and first-hand look at your operation. She will walk around your fields to see what the neighboring land around you is like, assess power line easements to make sure they aren't sprayed for weeds, and look for things like wildlife hedgerows, windbreaks, erosion prevention, contour planting, and irrigation sources. She will check out your barn or shop, the packing shed/wash station, and cooler. She will ask to examine your inputs, check out field equipment and tools, and visit your greenhouse, looking at potting soil, type of lumber, and any soil amendments. Back in the office, you might be asked to show your seeds, receipts, field notes, or any other supporting data not included in the application.



#### **3. ON-SITE INSPECTION**

 At the visit, the certifier will review your application, make any needed changes, and tour your operation.

#### **4.** GRANTING CERTIFICATION

- The certifier will take the application back to the office for review and, hopefully, acceptance.
- Once you've been accepted, you will be mailed your approval letter and certificate.
- Now you're certified organic! Each certificate is effective for one year.

#### **5.** CONTINUING CERTIFICATION

- Your annual renewal will take place about the same time each year. You will be mailed or emailed the annual renewal application and then called or emailed to set up a renewal appointment
- Like the initial application, but much less intensive, your certifier will conduct the annual renewal visit to evaluate the application and tour the farm.

# YOUNG FARMERS WEIGH IN



# NATE DRUMMOND & GABRIELLE GOSSELIN | SIX RIVER FARM, ME sixriverfarm.com

#### Certified since 2007 by Maine Organic Farmers and Gardeners Association

We choose to be certified organic because of these two frequent conversations we have at our farmers' market stand:

- 1. *Customer:* (reads our "organic" sign) "Is everything here organic?" *Us:* "Yes, all the produce here is certified organic and grown on our farm in Bowdoinham." *Customer:* "That's wonderful!" (and starts to shop)
- 2. *Customer:* (reads our "organic" sign) "Are you the only vendor with organic produce at this market?" *Us:* "Yes" (because we don't have the time, or feel the obligation to explain that another vendor claims to follow organic standards but chooses not to be certified, or that another vendor is conventional but claims to follow IPM spray practices). *Customer:* "Great." (and starts to shop)

In truth, we choose to be certified organic for a wide range of reasons: the certification standards broadly match our values of sustainable farming practices and healthy produce; the paperwork requirements have forced us to implement farm record-keeping systems that have benefited our farm's overall efficiency; certification allows our farm to be officially 'counted' as an organic farm in terms of state and national policy implications. However, the biggest reason we choose to be certified organic is that it makes good marketing sense. Even though we sell the vast majority of our produce directly to consumers at farmers' markets, and at least one of the two of us is always at our market stand, many of our customers still look first and foremost for our "certified organic" signs when evaluating the sustainability of our farm practices (rarely are we asked in person about the details of those practices). For many of our customers our "organic" label communicates that our practices match their values for locally produced sustainable and healthy produce.



#### ALTHEA & MATTHEW RAIFORD GILLIARD FARMS, GA gilliardfarms.com

**Certified since 2011 by California Certified Organic Farmers** Gillliard Farms was started in 2011 by Althea and Matthew Raiford. The land has been in our family and farmed since 1874—six generations. Knowing that the old farm ways were always what we now

call "organic" and that chemicals had not been used on the property, it just made sense to become organically certified. The certification from CCOF was not a daunting task. It holds us to a standard that cannot be dropped, and no short cuts are allowed; we are accountable.



#### DON DRURY BOOTSTRAP FARM, OK bootstrapfarm.blogspot.com

## Certified since 2013 by Oklahoma Department of Agriculture, Food and Forestry

I have more confidence now that I am certified, because saying "no spray" or "all natural" felt tacky and disingenuous in a marketing climate that is

already filled with phonies. It also helps us feel like we get some appreciation for all the extra work we do to grow organically. It is practically mandatory as well when you sell wholesale to large chains. The national produce buyers will not pay a penny over conventional prices unless you have certification. When you decide to certify, put your effort into building a whole-farm record-keeping system with the NOP in mind. It will make certification super easy.

# 4. RECORD-KEEPING

Once your farm has been granted certification, maintaining records can be fairly simple if done daily over the course of the season. Dedicating a few minutes at the end of each day to note activities, any fertilizer/pesticide applications, or planting will make your records living, working documents that will serve you well beyond the certification purposes. They are invaluable tools for planning which crops to grow and when, gauging variety performance, tracking pest outbreaks through the years, determining market demand for particular crops, and countless other benefits necessary for business management and success.<sup>3</sup>

Clearly, the larger and more diverse the farm, the more involved record-keeping will be. Nevertheless, if you maintain accurate records throughout the year, it can take as little as a morning to compile the paperwork needed for annual certification renewal and another couple of hours for the visit and inspection of a family-sized operation.

### FORMS AND FORMATTING

The NOP doesn't stipulate what records to keep or how: only that you must hold on to them for at least the previous five years, that they should be adequate for verification and auditing, and be available for inspection. Find out from your certifier what they expect from you. If you can get an exact document list, you can set up records so that they are certification-friendly and not overwhelming right from the start.

The annual renewal application is likely to ask for at least these records: soil test, field map, seed and transplant orders, amount and types of crops sold, pest and fertility observations and applications, and projected yield based off of that year's harvest records total. You might also be asked to show receipts for purchases. Additionally, you should keep the product label for any input you purchase in a file.

3. With increasing scrutiny on food safety, record-keeping is essential for tracking and tracing practices and produce.

Multitudes of farm record-keeping software options are sold online, and there is at least one software option designed specifically to help manage records for organic certification called COG Pro. Whether or not any of these is right for your farm is a matter of preference. You can also get by comfortably with Microsoft Word, Excel, and QuickBooks (or another financial record-keeping program).

Free templates of record-keeping forms are available from multiple sources. Here's a roundup of some useful examples.

- ATTRA's "Organic Market Farm Documentation Forms" offers a comprehensive list of templates. attra.ncat.org/publication.html#organic
- North Carolina State University Cooperative Extension has empty templates in Microsoft Word that can be downloaded and modified to fit your operation, as well as samples already filled in to give you an idea of how to use them. growingsmallfarms.ces.ncsu.edu/growingsmallfarms-orgrecords
- Rodale's electronic Organic System Plan allows you to fill out your own plan online. rodaleinstitute.org/farm/organic-system-plan

## A PRACTICAL EXAMPLE: HOW TO SET UP YOUR RECORDS WITH WORD AND EXCEL

On my and my partner's farm in Oklahoma, we grow on six acres of land divided between annual and perennial crops. We sell through a Saturday farmers' market and a 125-member CSA. Farming is our full-time job. We have been farming since 2004; we leased land for three years on the urban edge, and we have been certified organic on our own farm since buying it in 2007.

We divide our records into two areas: field and financial. Field records include the daily field notes in Word and the seed order, greenhouse schedule, planting schedule, harvest records, and pest and fertility records all in Excel. Financial records are kept in QuickBooks Pro and include (beyond the customary expense accounts) a "market sales receipt" which we use to enter our farmers' market sales by crop.

We do not need to submit every record we keep for our certification application, but the records are there for our use and in case the certifier should want to see more detail. Those we print out for our annual renewal are the seed order, pest and fertility records, harvest record totals (which we use to project yields for the next year), and QuickBooks "sales by item summary" (listing each crop and the quantity sold that year). For our field map, we drew out a map to scale on graph paper our first season, uploaded it as a PDF, and print it off each year. If we add new perennial beds or make other changes, it's easy to modify.

#### **DAILY FIELD NOTES**

Written daily to record activities and observations. We keep track of the hours worked for our own interest only.

#### MAY 12: 8 HOURS

- ACTIVITIES: Till and make beds; transplant summer crops.
- OBSERVATIONS: The soil conditions were just right for rototilling—not too wet and not too dry. The weather was sunny and in the 80's after last night's drizzle.

#### **GREENHOUSE SCHEDULE**

CROP	TRAYS	DATE	NOTES
Cabbage – Farao	1	1/24	great germ
Lettuce – Ruby Red	1	1/24	poor germ rate
Lettuce – Lolla Rosa	1	1/24	poor germ rate
Onion – Candy	6	1/24	great germ
Onion – Sierra Blanca	6	1/24	great germ
Tomato – Cherokee	2	1/24	slow to germ
Number of Trays Needed	17		
Cabbage – Farao	1	2/4	great germ
Lettuce – Ruby Red	1	2/4	great germ
Lettuce – Lolla Rosa	1	2/4	great germ
Number of Trays Needed	3		

#### **SEED ORDER**

Records crops and varieties, noting those that are organic. The code and price columns facilitate placing the order.

CROP	VARIETY	CODE	QTY	PRICE	ORGANIC
JOHNNY'S					
Cabbage	Farao	2110G	2 pkt.	\$7.90	organic
Carrot	Nelson	215	50,000	\$47.50	
Eggplant	Traviata	2575G	1 pkt.	\$6.95	organic
Onion	Candy	2991	5,000	\$19.75	
Onion	Sierra Blanca	103	5,000	\$23.00	
Tomato	Big Beef	2063	1 pkt.	\$3.45	
Tomato	Green Zebra	2276	1 pkt.	\$3.95	organic
Tomato	Cherokee Purple	753G	1 pkt.	\$3.95	organic
				\$116.45	
HIGH MOWING					
Greens	Yukina Savoy	2493	1/2 oz.	\$6.30	organic
Greens	Tat Soi	2510	2 oz.	\$10.00	organic
Pepper	Nu Mex Joe e Parker	2785	1/64 oz.	\$2.75	organic
				\$19.05	
MORGAN COUNTY					
Lettuce	Lolla Rosa	226	1 oz	\$3.50	
Lettuce	Ruby Red	406	2 oz	\$5.60	
Lettuce	Salad Bowl Red	3159	1 oz	\$7.60	organic
				\$16.70	

#### **PLANTING SCHEDULE**

The planting schedule is a map of what crop and variety gets planted in each bed and row. It is created in Excel, and we let one spreadsheet represent one field. Through simply copying and pasting the planting schedule into another document, it then becomes the harvest records and pest and fertility records, as will be shown below.

BED	ROW	CROPS (S to N and W to E)	DATE
	now		
1		Strawberries – Chandler	26–Sep
2		Strawberries – Chandler	26–Sep
3		Strawberries – Chandler	27–Sep
4		Carrot – Nelson	1–0ct
5		Fava Beans – Windsor	1–Oct
6	А	Onions – Candy	10–0ct
	В	Onions – Sierra Blanca	
7	А	Garlic – Italian Purple	10–0ct
	В	Onion – Candy	
8		Arugula	28–Mar
9		Carrots – Nelson	28–Mar
10	AB	Tokyo Turnips	28–Mar
	CD	Salad Mix	28–Mar
11	А	Lettuce – Lolla Rosa	9–Apr
	В	Lettuce – Ruby Red	

#### **PEST AND FERTILITY RECORDS**

We combine pest and disease observations and any treatments or applications in one spreadsheet.

BED	CROP	FEB 29	LATE APRIL Observations	APR 21	MID MAY Observations	JUN 24
1	Strawberries – Chandler	Spray Fish/Kelp			Gray Mold	Plant cowpea cover crop
2	Strawberries – Chandler	Spray Fish/Kelp			Gray Mold	Plant cowpea cover crop
3	Strawberries – Chandler	Spray Fish/Kelp			Gray Mold	Plant cowpea cover crop
4	Carrot – Nelson					Plant cowpea cover crop
5	Fava Beans – Windsor					Plant cowpea cover crop
6	Onions – Candy					Plant cowpea cover crop
	Onions – Sierra Blanca					Plant cowpea cover crop
7	Garlic – Italian Purple					Plant cowpea cover crop
8	Arugula					Plant cowpea cover crop
9	Carrots – Nelson					Plant cowpea cover crop
10	Tokyo Turnips					Plant cowpea cover crop
	Salad Mix		Cucumber beetle			Plant cowpea cover crop
11	Lettuce – Lolla Rosa	Spray Fish/Kelp	Cabbage Loopers	Spray Bt		Plant cowpea cover crop
	Lettuce – Ruby Red	Spray Fish/Kelp	Cabbage Loopers	Spray Bt		Plant cowpea cover crop

#### HARVEST RECORDS

We keep track of our daily harvest on a simple, hand-written picksheet that lists the item and the pounds, number of bunches, pints, or other recording unit picked of each item. At the end of the day, these figures get entered into the Excel spreadsheet. At the close of the season, we can sum each row to get a seasonal total harvested by bed and crop.

BED	ROW	CROP	UNIT	APR 12	APR 19	APR 25	MAY 3	MAY 12	TOTAL
1		Strawberries – Chandler	pint	36	44	72	101	157	410
2		Strawberries – Chandler	pint	40	48	69	110	161	428
3		Strawberries – Chandler	pint	35	53	75	99	153	415
4		Carrot – Nelson	pint	100	125	150			375
5		Fava Beans – Windsor	bunch				50	135	185
6	А	Onions – Candy	pound	50	45	60	35		190
	В	Onions – Sierra Blanca	bunch	55	40	70	30		195
7		Garlic – Italian Purple	bunch	25	65	75	100		265
8		Arugula	bunch	50	40				90
9		Carrots – Nelson	bunch			150	150		300
10	AB	Tokyo Turnips	bunch			50	100		150
	CD	Salad Mix	pound		20	60			80
11	А	Lettuce – Lolla Rosa	head					75	75
	В	Lettuce – Ruby Red	head					100	100

We use QuickBooks Pro to record our finances. We enter a "Sales Receipt" for each farmers' market, listing what and how much of each crop we brought and how much we sold. It takes about 15 minutes to fill out each market Sales Receipt. Each crop has a unique item category, allowing us to generate a report at the end of the year tallying our "Sales By Item Summary." This gives a precise account of our total sales by crop for the season. Beyond its uses in our certification process, it is even more important for business planning. We can quickly compare how much of each crop we harvested with what we actually sold, making it a useful tool in adjusting our planting volume for the coming season.

There is nothing complicated, time-consuming, or glamorous about our records. The main task is keeping up with them. When factored into the end of each day, the process becomes a means of organizing and preserving all of the information hovering in a farmer's mind. Even if we weren't certified, we would keep and use these records.

# **5.** MARKETING STRATEGIES

Telling your organic story to customers is a proof positive way of reaping the rewards certification brings. Here are some tips for capitalizing on your certification.

Post your certificate on your **website**.

Give the USDA Organic seal top billing on your **business cards**, **brochures**, and recipe cards.

Write about your certification process and what it means to you in **newsletters and blogs**.

Remind customers about your annual inspection with pictures of the process posted on **Facebook**.

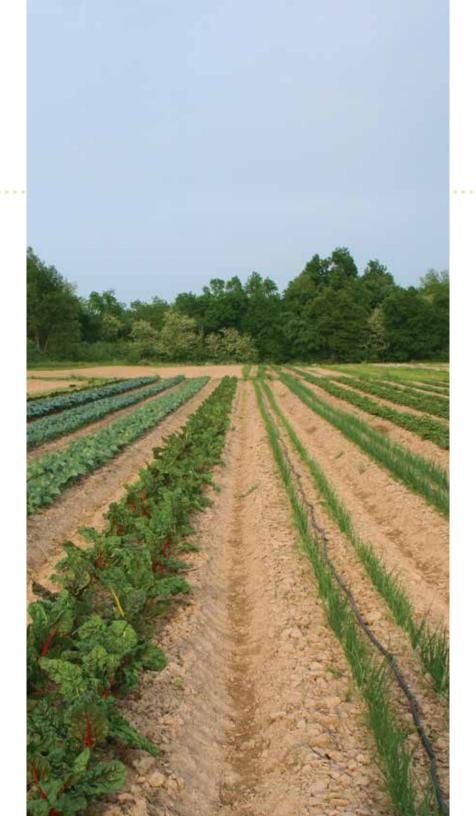
Use **organic twist ties** on bunched produce or **stickers** on individual items to add cachet.

Consider adding a **tagline** to your farm name, brand, or logo using the word "organic" (something you can only do legally if certified). Post **banners** and individual **product signs** saying "organic." These give shoppers doing a quick drive-by a distinct and immediate reason to buy from you.

Prominently feature your organic certificate at farmers' markets, farm stands, and CSA pick-up locations.

Describe your farm as certified organic on **farm listings and directories** to help attract new customers.





# CONCLUSION

If you sell directly to most of your customers, you might not need certification to run a profitable business. It is easier and more convenient not be certified in the short-term, but the long-term health of the cause depends on farmers opting in to certification. If reading this guide has helped you believe that certification is worth the time and effort, joining will garner rewards for you and the cause as a whole.

Being certified means being part of an international social and environmental movement. It tells other farmers and your customers in two simple words who you are and how you grow: certified organic.

There was a time when nearly all certified organic farms were small, family-scale operations. Will there come a time when most of them are large corporate farms? Not if this next generation of young farmers makes its voice heard and gets counted.

# **APPENDIX A** sources of organic materials

Finding sources takes time, and it's a constantly evolving process as new materials become available. It's good to talk to other growers in your area, and your certifier might know of sources from their inspection of other growers. Working with other farmers to pool resources to order in bulk can reduce costs by getting shipments palletized.

Below is a resource list for organic vegetable seeds, cover crop seeds, transplants, potatoes, garlic, and amendments, fertilizers, and pesticides. It is by no means exhaustive, but it's a good place to start for sourcing organic seeds and supplies. Locations are listed for help in assessing shipping costs.

*Note:* ATTRA has a Directory of Organic Seed Suppliers at attra.ncat.org/attra-pub/ organic\_seed/#details

#### VEGETABLE SEEDS (listed in alphabetical order)

Family Farmers Seed Cooperative, Oregon organicseedcoop.com New initiative. Limited selection, but should be supported.

Fedco Seeds, Maine fedcoseeds.com Good selection of organic seeds.

Harris Seeds, New York harrisseeds.com Limited selection of organic seeds.

High Mowing Seeds, Vermont highmowingseeds.com All organic seed company. Their catalog is a must for all organic growers.

Johnny's Seed, Maine johnnyseeds.com A great selection of organic seed.

Morgan County Seed, Missouri morgancountyseeds.com Some organic seeds. Good prices.

Osborne Seed Company, Washington osborneseed.com Good selection of organic seeds.

Seed Savers Exchange, Iowa seedsavers.org Good selection of organic OP and heirloom seeds. Small quantities.

Seeds of Change, California seedsofchange.com All organic seed company. Limited quantities.

Seeds of Italy, Kansas-distributor seedsofitaly.com Some organic seeds. Small quantities. Seedway, New York seedway.com Limited organic varieties, but those they have are good.

Southern Exposure Seed Exchange, Virginia southernexposure.com Good selection of organic OP varieties.

Territorial Seed Company, Oregon territorialseed.com *Limited selection of organic varieties.* 

#### **COVER CROP SEEDS** (bulk only, listed in alphabetical order)

American Organic, Illinois american-organic.com *Good selection.* 

Fedco Seeds, Maine fedcoseeds.com *Good selection.* 

High Mowing Seeds, Vermont highmowingseeds.com Limited selection of cover crop seeds.

Johnny's Selected Seed, Maine johnnyseeds.com Some organic seed.

Lakeview Organic Grain, New York lakevieworganicgrain.com *Good selection, and good prices.* 

Peaceful Valley, California groworganic.com Some organic seed.

Seven Springs Farm, Virginia 7springsfarm.com Good selection, and good prices. Welter Seed and Honey, Iowa welterseed.com Great selection of organic seeds. Excellent prices.

Wood Prairie Farm, Maine woodprairie.com

#### TRANSPLANTS (commercial quantities only, listed in alphabetical order)

Deep Grass Nursery, Delaware deepgrassnursery.com

Headstart Nursery, California headstartnursery.com

Windcrest Farm, North Carolina windcrestorganics.com

**POTATOES AND GARLIC** (commercial quantities only, listed by crop and in alphabetical order)

Lockhart Seed, California #209-466-4401 Organic potatoes. Great prices. Limited selection. (50 pounds or more only)

New Sprout Organic Farms, North Carolina newsproutfarms.com Good selection of organic potatoes.

The Potato Garden, Colorado potatogarden.com Great selection of organic potatoes. (50 pounds or more only)

Irish Eyes Garden Seeds, Washington irisheyesgardenseeds.com Good selection of organic potatoes and garlic. Wood Prairie Farm, Maine woodprairie.com Great selection of organic potatoes.

Maine Potato Lady, Maine mainepotatolady.com Great selection of organic potatoes and garlic. Good prices.

#### Garlic

Filaree Garlic Farm, Washington filareefarm.com

Great Northern Garlic, Washington greatnortherngarlic.com

Green Mountain Garlic, Vermont greenmountaingarlic.com

Grey Duck Garlic, Washington greyduckgarlic.com

Honey Hill Farm, New York honeyhillorganicfarm.com

Hood River Garlic, Oregon hoodrivergarlic.com

Keene Organics, Wisconsin keeneorganics.com

Organic Garlic Seed Farm, Oregon organicgarlicseedfarm.com

Strawhat Farm, Colorado strawhatfarms.com

Whistling Duck Farm, Oregon whistlingduckfarm.com

## AMENDMENTS, FERTILIZERS, PESTICIDES

If a product has the OMRI seal (Organic Materials Review Institute), it has been reviewed and approved for use by certified organic farms following the NOP standards (though not all products permitted for use by the NOP will have an OMRI seal. If in doubt about an input, always ask your certifier). OMRI maintains a database of all OMRI approved substances. If you know what you want to use but don't know if it is approved, your best bet is to sort through the products, suppliers, and/or categories of inputs. omri.org/omri-lists/download

Most local gardening centers or feed stores carry a limited supply of organic products, and those tend to be in small quantities. Below is a short list of companies that sell organic supplies in larger quantities. Shipping is expensive, so asking other farmers in your area for sources close to home can be a cheaper option.

Arbico Organics, Arizona arbico-organics.com Good selection of organic growing supplies.

Fedco Seeds, Maine fedcoseeds.com

Johnny's Seeds, Maine johnnyseeds.com *Limited selection.*  Peacefully Valley, California groworganic.com Great selection.

Seven Springs Farm, Virginia 7springsfarm.com Good selection.

#### HELP KEEP US UP TO DATE. GO TO THE NYFC FORUM TO POST A RESOURCE THAT YOU DON'T SEE HERE.

Visit <u>YOUNGFARMERS.ORG/ORGANIC</u> for a full list of resource links.

## **APPENDIX B** ELABORATING YOUR FARM NARRATIVE: ADDITIONAL LABELING OPTIONS

You can communicate even more about your values and farm with the following labels:

*Food Justice Certified*: addresses social issues through the Agricultural Justice Project: agriculturaljusticeproject.org

Food Alliance Certification: looks at social and environmental sustainability standards, but may not be as strict as the NOP with regards to product applications: foodalliance. org/certification

*Certified Wildlife Habitat:* signs are available for a fee through the National Wildlife Federation for voluntary efforts to foster habitat: <a href="https://www.to-Help/Garden-for-Wildlife.aspx">nwf.org/How-to-Help/Garden-for-Wildlife.aspx</a>

*United Farm Workers:* provides a label for farms whose workers are under UFW contract (only available in California): ufw.org

# DEFINITIONS

**Federal Register** – A government journal of public announcements in which the Final Rule for organic production is published.

Final Rule - The provisions of the OFPA that specify the standards of organic production.

National Organic Standards Board (NOSB) – The 15-member body appointed by the Secretary of Agriculture to advise the NOP on the standards and to determine the National List of materials permitted and prohibited in production.

National Organic Program (NOP) – The USDA program responsible for monitoring and enforcing the federal organic standards.

**Organic Foods Production Act (OFPA)** – The 1990 federal law that created the NOP and standards for organic production and oversight.

**Organic Materials Review Institute (OMRI)** – An independent, non-profit organization that reviews and approves inputs for use in an organic system according to NOP guidelines.

**Organic System Plan** – The management plan for organic production and handling that forms the foundation of an application for certification.

**Prohibited Substance** – An agricultural input or material not permitted for use in organic production, as specified in the Final Rule.

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Thank you for the following photo contributions: Cover Photo—Amy Marcoux Pages 4, 10, 13, 14, 17—Six River Farm, Bowdoinham ME Pages 8, 11, 16, 19, 27—Three Springs Farm, Oaks OK Page 26—Full Belly Farm, Guinda CA

Visit <u>YOUNGFARMERS.ORG/ORGANIC</u> for a full list of resource links.



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