


The Organic Voice

Organic Farmers Association – No. 17 • June 2025

A man with a beard and a dark cap is holding a white chicken in a greenhouse. In the background, other chickens are visible on the ground, and there are red and white hanging feeders.

Best Management Practices for Controlling Flies in Livestock

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An Update on H5N1 in Mammals

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From Our President

My mother let me and my brother eat dirt. It was an important part of her approach to helping us grow up to be healthy, in addition to eating a varied diet, playing outdoors, and childhood immunizations. She believed that exposure to the organisms in that dirt—whether ingested or just rubbed into the skin—helped our bodies adapt themselves and become better at dealing with infections and disease. Because the world was full of a host of things that could impair us, she wanted her boys to be as capable and healthy as she could make them.



Pryor Garnett at Alki Beach, Washington, 1959.

Health is a big topic, and one that's getting a lot of attention and debate these days. This issue of the Organic Voice considers the health of animals in organic operations. That's an issue that the organic community has wrestled with and argued about for decades. And really, the health of animals (and I include humans here) has been the heart and soul of organic practice.

- The plummeting health of birds and insects from widespread use of DDT and other pesticides, documented in Rachel Carson's 1962 book, "Silent Spring," spurred public awareness of the effects of agricultural chemical usage.
- The cancer-causing effects of Alar (sprayed on apples) in the late 1980s led directly to Congress passing the Organic Foods Production Act of 1990 and establishing the U.S. National Organic Program which regulates organic agriculture.
- Consumers seeking healthier foods, textiles, and personal products are increasingly choosing organic in their purchases.

As a grain grower, I don't usually get involved with livestock, but this year I invited my neighbor to pasture some of his cattle on my fields so they could graze on the wheat and rye stubble and spend the mild, western Oregon winter on pasture.

It was a win-win, because while the cattle were enjoying the fresh air and moving from area to area, they were improving the health of my soil by adding their droppings and speeding the decomposition of the stubble. Everything gets healthier that way—the soil, the cattle, and eventually the humans who buy meat from my neighbor or grain harvested from my fields.

If you think about the health of a societal system like agriculture, I and many of my colleagues believe that organic practices are better than the industrial (a.k.a. conventional) alternative. Organic production relies on the interactions of a great variety of organisms in the soil and environment, without the intervention of synthetic pesticides and fertilizers. The result is a resilient system that is less dependent on particular inputs, and better able to handle problems like weather, disease pressure and pests by relying on its own, innate strengths and health.

Organic is fundamentally all about health—of humans, of other animals, of the soil, and of our society. And the keys to health are pretty much what my mother provided for her kids: a diverse diet of clean, whole foods; fresh air and exercise; and an environment free of synthetic chemicals.

Sincerely,

Pryor Garnett
OFA Governing Council President
Garnetts Red Prairie Farm
Sheridan, Oregon





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Summer Policy Update

Decisions being made right now in Congress and at the USDA are going to shape what organic agriculture looks like for years to come. In this article, we'll outline important updates on the federal budget and what it means for the Farm Bill, the ongoing work on a full Farm Bill, and recent events at USDA.

BUDGET RECONCILIATION & THE FARM BILL

In mid-March, Congress moved to keep the Federal Government open with a temporary Continuing Resolution. Recently, there has been some movement on the budget as House Republicans passed a large budget package in May through the Reconciliation process. Budget Reconciliation is a special process to speed the passage of budget-related laws with a simple majority and avoiding the filibuster in the Senate. Senate Republicans will likely make further changes to the package, with the goal of passing for approval by the President in June or July—an ambitious goal with their slim majority.

The budget bill passed by the house on May 21 includes tax changes President Trump championed on the campaign trail, more money for the military and border security, and funding for some agriculture programs (some have called it a mini Farm Bill). To offset these costs, cuts would be made to key safety-net programs like Medicaid and the Supplemental Nutrition Assistance Program (SNAP), along with some green tax incentives from the Biden era.

Of note to the organic community, several so-called "orphan programs" that were not funded as part of the March Continuing Resolution were funded in the House budget bill.

- ➔ **The Organic Certification Cost Share Program (OCCSP)** will be funded at \$8 million, for seven years, including this current year. That's the same funding level the program was given in the 2018 Farm Bill, and OFA will continue to advocate for higher funding levels to cover the increased costs of organic certification.
- ➔ **The Organic Transition Initiative (OTT)** was also level-funded at \$5 million for the next six years.
- ➔ **The Organic Data Initiative (ODI)** won't receive additional funds in 2025, but will get a boost of \$10 million over the next six years. This is double what was allocated in 2018.

Meanwhile, work on the full **Farm Bill** continues, though the outlook for its passage will be more uncertain if the Republican budget passes with funding for some Farm Bill programs included. Lawmakers are working on marker bills that are not meant to pass on their own, but are important for building support for policies and ideas we hope will make it into the final Farm Bill.

Marker bills introduced during the last congress need to be reintroduced this session, and you can find more information on those in OFA's Farm Bill Marker Bill Tracker.

Farm Bill Marker Bill Tracker

NEW!



Legislators of the 119th Congress are beginning work to introduce and reintroduce Farm Bill marker bills. (Bills that OFA supported last year need to be reintroduced in the new Congress.) These bills are not intended to pass on their own, but are a vehicle to introduce ideas and build support for policies in hopes that they'll be included in the next Farm Bill. Keep track of organic policies in our tracker!

[View the Tracker](#) ➔

ADVOCATING FOR ORGANIC IN APPROPRIATIONS

Another important funding stream to track is the annual Appropriations process, through which Congress decides how to fund all the government programs each year. Organic champions in the House and Senate are advocating for investments in organic agriculture as funding levels are determined for Fiscal Year 2026.

In May, 44 members of Congress sent a letter to the House Agriculture Appropriations Subcommittee urging leadership to for funding in three key areas:

- 1 **\$24 million for the National Organic Program (NOP)**
- 2 **\$1 million for the Organic Data Initiative (ODI)**
- 3 **\$1 million for the Organic Certification Trade and Tracking Program (OCTT)**

Additionally, 10 members of the Senate sent a similar letter to their Ag Appropriations leadership requesting **\$11 million for the Organic Certification Cost Share Program**. These funding levels are crucial to provide the National Organic Program with the resources it needs to oversee and enforce organic standards.

Please take a look at the [House](#) and [Senate](#) signers and thank your legislators if they signed.

USDA UPDATES

It has been an eventful spring at the USDA. First, some news on staffing. On May 21 Dudley Hoskins went before the Senate Committee on Agriculture, Nutrition, and Forestry for a hearing to be confirmed as Under Secretary of Agriculture, Marketing, and Regulatory Programs. The seat was formerly filled by Jenny Lester Moffit. And on June 2, Dr. Jenny Tucker returned to the NOP after a brief stint working on Specialty Crops. She is welcomed back by OFA!

USDA Updates cont.

After deep cuts to USDA staffing through the Deferred Resignation Program, Secretary Brooke Rollins has announced that no further buyouts are planned for the Agency. The reorganization of the workforce that may involve moving some out of the Washington D.C. office is facing legal challenges, but is still ahead.


This spring also brought some good news about funding for several USDA programs starting to flow again.

- After a review, Secretary Rollins has announced a second round of the **Market and Agriculture Stabilization Program (MASC)** payments for specialty crop growers. This program helps specialty crop producers deal with the often higher costs of marketing their perishable products, like handling, shipping, and packaging.
- The **Transition to Organic Partnership Program (TOPP)** has also been reviewed by the USDA and is now cleared to start approving and processing payments for all TOPP agreements again. The USDA's priority will be processing reimbursement claims for work done after January 20 of this year. Later, they will be reaching out to TOPP partners to discuss upcoming work and set a timeline to finish the initiative by the end of 2026.
- **Organic Market Development Grants (OMDG)** have finished their review, and existing contracts will be honored. More details should become available once Under Secretary Hoskins is confirmed.
- USDA announced **\$26.5 million in grant funding** available through the **Local Agriculture Market Program (LAMP)**. This program helps local and regional food groups develop and expand direct-to-consumer sales, local markets, and local food businesses. LAMP includes the Farmers Market Promotion Program (FMPP), Local Food Promotion Program (LFPP), and the Regional Food System Partnerships (RFSP). You can apply for these grants until June 27, 2025.

- USDA announced **\$72.9 million in grant funding** through the **Specialty Crop Block Grant Program**, aimed at supporting projects that improve the competitiveness of specialty crops nationwide. Applications must be submitted to the appropriate state department of agriculture to be considered for funding, and are being accepted through July 7, 2025.

PROPOSED RESCISSION OF MUSHROOMS AND PET FOOD RULE

Unfortunately USDA's Agricultural Marketing Service has proposed rescinding the Mushrooms and Pet Food Rule. This rule, finalized late last year, was seen as an important step in clarifying and supporting market development for these specific organic sectors.

The proposal is open for public comment until June 11. OFA will be putting together some ready-to-use comments and an easy way for you to submit your feedback. Keep an eye out for an email from OFA with those details or watch for updates on OFA's [Facebook](#) or [LinkedIn](#) pages. 

Lillian Hawkins is the Policy Director of Organic Farmers Association. She ensures the policy priorities of certified organic farmers are represented in Washington, D.C.



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FEATURED STORY

Best Management Practices for Controlling Flies in Livestock

By Harriet Behar

Similar to growing crops, organic livestock management relies on the avoidance of synthetic inputs, promotion of ecological balance, and building robust systems based on natural processes. There are more complications when raising livestock versus crops, but with a solid system that lessens animal stress, farmers can avoid production losses associated with the irritation and diseases associated with flies.

PROMOTING ANIMAL HEALTH

Providing a well-balanced ration for each stage of life for your animals is the first step in promoting animal health in an organic system. If you are growing and feeding your own crops, it is useful to work with an animal nutritionist and test your feeds to make sure that your animals are not lacking the nutrients they need during their specific stage of life. All species of animals need high-quality feeds, which provide the immune support to aid animals in tolerating internal or external parasites. Housing and outdoor access should provide clean and dry bedding and congregation areas that allow for freedom of movement.

Pay special attention when animals are under stress, such as pre- and post-birthing, when animals are young, and when climatic conditions such as excessive heat, cold, dryness, or rain challenge livestock immune systems. This applies to all species, beef and dairy cattle, swine, goats, sheep, and poultry.

KNOW YOUR PEST

While these pests outnumber us, we can use our knowledge of their life-cycles, habitat, and food sources to lessen their numbers through environmental modifications. Identify the type of flies present to target your specific changes to disrupt their breeding, feeding and living. Using a variety of approaches tends to work best.

Practice good sanitation in housing and outdoor congregation areas. Flies can contribute to the spread and prevalence of some internal parasites, acting as vectors by transmitting internal parasite eggs or larvae through their movements and feeding habits.

Know Your Pest cont.

To deal with internal parasites, set up your pasture rotations to provide taller grasses so the animals are not eating close to the ground, and maintain sufficient rotation cycles so that the animals are kept out of a paddock long enough to prevent them from being exposed to viable adults or larvae that could reinfect them. Using targeted deterrents and repellents, such as essential oils and trapping, can help keep pest populations at low levels. Activities that prevent and control parasites are easier to manage than dealing with an established large population of pests.

FLIES AND GNATS AROUND HOUSING

Most flies need from 7-21 days to complete their life cycle and tend to breed in moist areas. Manure, wet hay or straw, spilled grain, and silage should be removed on a regular schedule. The addition of diatomaceous earth or lime to bedding can lessen reproduction of flies. Wood chips and washed sand as bedding can also lessen fly pressure. Use of a variety of organically approved traps, both indoors and outdoors, is an important part of the overall system to manage flies. Fly tapes running the length of the barn are useful and need to be replaced throughout the season, when they are full. Placing sticky traps or jar traps up high and out of the wind works best.

There are a variety of large, stiff-bristle brushes that can be used either in the barn or pasture. Cattle enjoy rubbing against the brushes, which remove manure or mud that could be present on the backs of cattle, deposited by their swishing tails. Large fans can provide a cooling breeze as well as prevent flying insects from irritating livestock. A large hatching of gnats can kill young poultry by clogging their nostrils, and placing fans around their indoor and outdoor living area can prevent issues until either the gnats lessen or the birds grow.

Many farmers have had good results when “inoculating” their environment with fly predators (parasitic wasps). Listed at the end of this article are numerous companies that sell pupae that you can release periodically. These wasps kill the fly larvae, preventing them from maturing into adults. Using this tool around the housing and congregation areas works better than out in pastures. Some farms have found that after using these for a few years, they have created a native population and do not need to continue purchasing them for the full season.



There are numerous fly repellants allowed in organic production, typically based on essential oils including peppermint, lemongrass, citronella, eucalyptus, cinnamon, and more. Others may include a natural pyrethrin. These would be sprayed on the animals periodically. As with all inputs, always verify with your certifier that the product you want to use is acceptable and does not contain something not organically approved. If the product contains an OMRI seal, it is approved for use, but you must add it to your OSP.

Flies can spread pinkeye in cattle. Feeding kelp in the ration has shown some success in helping cattle deal with pinkeye, as well as eye patches along with aloe vera or other soothing materials to heal the infection.

Encouraging native bird populations has also been a strategy for fly control in the past, but with the advent of avian flu, it is probably best not to attract birds to your cattle and poultry currently. Electrocuter fly traps are not recommended, since when the flies disintegrate, pathogens can be spread.

PASTURE STRATEGIES FOR FLY CONTROL

As a first step, breaking up manure patties with a drag in the pasture or barnyard to encourage them to dry out quicker can also lessen a large hatching of flies in some situations. If you're looking for a more powerful method, organic dairy farmer Kevin Jahnke in Wisconsin has devised a "fly barrel" that he uses in his various paddocks. The 55-gallon barrel has a bait inside that attracts flies, and they cannot find their way out. This catches so many flies that it needs this large barrel to catch them. When rotating his herd, he moves them to a further away paddock rather than an adjoining one, and it takes a few days for the flies to catch up with the herd. Once the flies realize where the animals have been moved, it is time to move the herd again.

PRODUCTS & SUPPLIES

Fly Predator Suppliers

- Arbico Organics
- Spalding Labs
- Organic Cowboy
- Buglogical
- Kunafin

Horn Fly Traps

- CEFS Dairy Unit Develops "CowVac"
- CowVac in Action
- Horn Fly Walk-Through Trap Instructions

Installing walk-through fly traps placed where cattle tend to visit regularly, such as the entry to the barnyard or watering areas, is another effective method. The cattle learn that after walking through these traps, they find relief from the flies and readily use the traps. You can either purchase or build a fly trap that has a vacuum which sucks the flies off the backs of the cattle when they walk through. (Information is available in the box to the right.)

While flies will always be present, there are a variety of methods that can be employed to keep the populations to a level that does not harm or irritate your livestock. 🌱



Harriet Behar is OFA's Farmer Services Consultant, and was one of OFA's founding members. She has been involved with federal, state, and local policy advocacy for over 30 years. She runs organic Sweet Springs Farm in Gays Mills, Wisconsin.

Kevin Jahnke & Fly Barrel Trap, photo via NODPA



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Poultry Health: HPAI and Organics

By Sharon Raszap Skorbiansky and Kelsey Vourazeris



HIGHLY PATHOGENIC AVIAN INFLUENZA IN THE UNITED STATES

Highly Pathogenic Avian Influenza (HPAI) poses a significant threat to both conventional and organic poultry operations in the United States. Avian influenza, commonly known as “bird flu” is a respiratory disease found in wild and domestic birds and other species. When particularly virulent forms emerge that are highly contagious and lethal to domestic poultry, they are classified as HPAI. The current outbreak began with detection in wild birds in December 2021, followed by the detection in domestic birds in February 2022.² The ongoing outbreak has implications for both conventional and organic producers.

Every state has recorded HPAI detections since the 2022 outbreak (fig. 1). The distribution of outbreaks can correlate with migratory bird flyways, poultry industry concentration, and wildlife habitat interfaces. The scale of HPAI impact can be substantial even at the individual operation level. For example, a single detection in Arizona in May 2025 affected over 2.2 million table egg layers.³

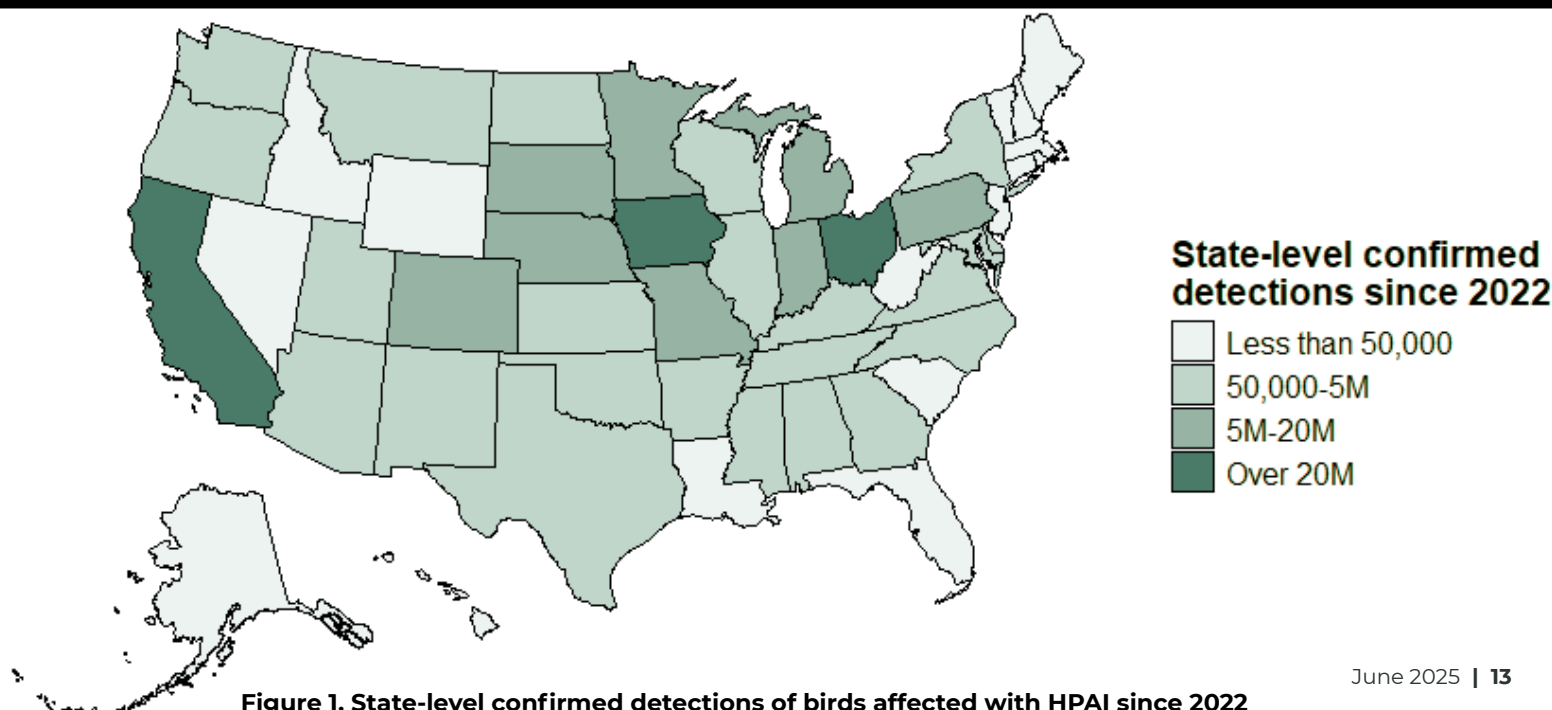
According to USDA estimates based on monthly data collection from industry, the 2025 organic cage-free table egg layer population stands at over 20 million birds, representing 7 percent of the total U.S. flock.⁴ Since November 2023, over 2.3 million organic layers have been affected by HPAI, and over 26 thousand between January and April 2025.

DETECTING AND RESPONDING TO HIGHLY PATHOGENIC AVIAN INFLUENZA

These symptoms may appear in poultry for a variety of reasons. If producers observe high death rates with signs outlined as above (for example, chickens gasping and experiencing extreme diarrhea followed by rapid death), they are advised to contact their agricultural extension office or agent, local veterinarian, local animal health diagnostic laboratory, or the State veterinarian immediately. They may also call USDA toll free at 1-866-536-7593. Rapid reporting is essential as HPAI can spread quickly through direct bird-to-bird contact, or through indirect transmission via contaminated surfaces, materials (like egg flats), clothing, or footwear.⁵

After reporting, USDA and State personnel visit the farm, place the operation under quarantine, and take samples from live birds, dead birds, and birds’ housing, and assign the operation a case worker. Once HPAI is detected, affected flocks are depopulated to prevent further spread. There are many methods to rapidly kill poultry.

Source: Authors using data from USDA, Animal and Plant Health Inspection Service. Note: Data includes detections of all birds, such as broilers or turkeys, and birds not raised or kept for the production of commercial animal products, such as backyard flocks or pet birds.



Detecting cont.

The American Veterinary Medical Association has preferred methods based on considerations of available resources, time to implementation, animal welfare, and likelihood of further disease spread. As a result, depopulation methods preferred will differ depending on different styles of housing systems (e.g., battery cages, multi-tier cage-free aviaries, and pasture production).

For example, preferred methods for floor-reared confined poultry include water-based foam generators or whole-house gassing. Producers raising pasture-raised birds will have different options depending on whether they have access to enclosures. If producers are able to confine birds, they can follow depopulation methods similar to those in floor-reared housing. However, those without the ability to confine may require the use of a captive bolt gun or cervical dislocation.⁶ In practice, the most common depopulation methods for HPAI-affected barn flocks are water-based foam for floor-raised birds and carbon dioxide gas for caged birds, and ventilation shutdown.⁷

Of these three, carbon dioxide gassing is viewed as the more humane alternative; followed by water-based foam depopulation, involving pumping foam into the contained area suffocating the birds by blocking their windpipes, and ventilation shutdown which involves trapping animals inside a building, and closing off the airflow leading to suffocation and heat stroke.⁸

If confinement is a possibility, there exist other methods that are faster and cause less suffering, often used in other countries, such as the use of inert gases like argon or nitrogen, or a mixture of these gases with 20 to 30 percent CO₂. Inert gases are not detected by poultry and do not cause aversive reactions.⁹ The USDA National Organic Program (NOP) Organic Livestock and Poultry Standards (OLPS) clarified that certification is not jeopardized when government agencies mandate non-organic euthanasia methods during emergency response.¹⁰

Disposal of depopulated birds depends on the type of farm, State and local laws, as well as producers' preferences, and includes composting, burial, incineration, rendering, or landfiling. Producers are prohibited from allowing birds from HPAI-infected flocks to enter the food supply chain.

Producers can monitor flocks for indicators of potential HPAI infection:

Category	Signs and Symptoms
Mortality	<ul style="list-style-type: none"> Sudden death without any prior symptoms of illness
Physical	<ul style="list-style-type: none"> Swelling of the eyelids, comb, wattles, and shanks Purple discoloration of the wattles, comb, and legs Nasal discharge, coughing, and sneezing Diarrhea
Behavioral	<ul style="list-style-type: none"> Lack of energy and appetite Gasping for air (difficulty breathing) Twisting of the head and neck Stumbling or falling down
Production	<ul style="list-style-type: none"> A drop in egg production or soft-shelled, misshapen eggs

Generally, USDA or contractors perform depopulation and disposal directly, though a producer may carry out the tasks themselves and receive compensation. To do so, producers can work with their assigned case manager to create a financial plan, and USDA will reimburse activities at a rate equal to what would otherwise be paid to a contractor.¹¹

The assigned case manager guides producers through paperwork and appraisal of inventory needed to receive monetary payments (indemnities) for livestock deaths in excess of normal mortality rates. APHIS determines the value of the live birds and eggs based on a standardized indemnity table, which reflect the higher value of organically raised animals (see table 1). Once a producer signs the full appraisal and related paperwork, they must register through the Federal Government's System for Award Management to receive payments.¹²

Table 1. Veterinary Services Indemnity Table for 2025, selected examples

Animal	Dollar value per head for 2025, organic (100% market value)	Dollar value per head for 2025, conventional (100% market value)
Chickens, deboning/roasters, super roasters/parts (49+ days of age)	\$10.76	\$6.85
Chickens, roasters (42–48 days of age)	\$8.18	\$5.21
Chickens, broilers (32–41 days of age)	\$6.43	\$4.09
Chickens, broilers (<32 days of age) and small Cornish hens	\$4.33	\$2.75
Chickens, chicks	\$0.58	\$0.37
Turkeys, toms (84+ days of age)	\$48.43	\$27.38
Turkeys, toms (49–83 days of age)	\$39.62	\$22.40
Turkeys, hens (77+ days of age)	\$24.89	\$16.01
Turkeys, hens (49–77 days of age)	\$17.78	\$11.44
Turkeys, fryers and roasters (8–48 days of age)	\$11.21	\$8.36
Turkeys, poults (0–7 days of age)	\$4.47	\$3.54

Source: Authors using data from APHIS.

To resume operations, a producer can let their case manager know that the site has been empty for at least 21 days. At that point, APHIS returns a final time to collect and test environmental samples and ensure that the property is virus-free. If there is no active infections and controlled zones nearby, and the site has tested negative for the virus, APHIS alerts the producer that USDA and the State have approved the operation for restock and the farm is released from quarantine.¹³ Note that under new rules, commercial poultry facilities that are seeking indemnity payments after repeated bird flu infections must successfully pass a biosecurity audit prior to restocking to be eligible for future indemnity payments.¹⁴

ECONOMIC IMPLICATIONS OF HIGHLY PATHOGENIC AVIAN INFLUENZA

Between 2008 and 2018, retail price premiums in the U.S. organic table egg market carried a 40.9 percent premium over conventional eggs.¹⁵ Other animal welfare claims carry premiums as well, such as free-range (+18.7%), cage-free (+13.8%). Third-party humane certifications added around 8.8% to the estimated average premium. However, the premiums were shown to be sensitive to external shocks like HPAI. For instance, the 2014–15 reduced organic premiums by 10.8 percentage points, likely due to the increase in conventional prices from May to September of 2015.

PREVENTION AND BIOSECURITY

The first detection among wild mammals in the United States occurred in March 2022, and by April, the US International Health Regulations (IHR) National Focal Point (NFP) notified the first human case of avian influenza A(H5) in Colorado, in a poultry farm worker where influenza A(H5N1) virus was confirmed in poultry. The first case in a cow occurred in South Dakota in March 2024.¹ These developments highlight the importance of an appropriate biosecurity protocol both for preventing HPAI and for action once an infection has been identified, particularly as there is no available treatment for HPAI.

Outdoor access is a meaningful factor in organic management of animals. OLPS regulation allows for fencing, netting, or other materials over all or part of the outdoor areas to prevent interactions with wild birds.

Prevention cont.

APHIS offers two free, voluntary on-farm biosecurity assessments to all non-affected commercial poultry producers. The wildlife biosecurity assessment identifies how wildlife could spread HPAI, focusing on managing interaction with the flock. The biosecurity incentive-focused assessment works with the producer to review structural and operational biosecurity plans and practices.

Biosecurity assessments are generally targeted toward barned poultry, though some elements will still be helpful to pasture-raised operations. For example, through these assessments, APHIS evaluates proper disinfection and sanitation techniques, and may recommend new fencing or adding wildlife deterrents such as decoys and scare devices. USDA offers up to 75 percent of the cost to fix the highest-risk biosecurity concerns identified by the assessments.¹⁶ Producers can email poultry.biosecurity@usda.gov to request an assessment. 🌱



Dr. Sharon Raszap Skorbiensky earned her Ph.D. in Agricultural Economics from Purdue University. She is a Senior Research Economist at the USDA Economic Research Service where her research focuses on advancing knowledge of the U.S. organic agriculture food system.



Kelsey Vourazeris is a Ph.D. student in Agribusiness at Arizona State University, where she researches economic and policy issues related to agricultural food systems, primarily on technology adoption. Her interest in agricultural economics began during her undergraduate studies, where she became fascinated by how innovation in farming shapes broader economic and environmental outcomes.

1. Sharon Raszap Skorbiensky is a Senior Research Agricultural Economist at the U.S. Department of Agriculture Economic Research Service. Kelsey Vourazeris is a Ph.D. student in Agribusiness at Arizona State University. This research was supported by the U.S. Department of Agriculture, Economic Research Service. The findings and conclusions in this publication are those of the authors and should not be construed to represent any official USDA or U.S. Government determination or policy.
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- ✓ 823 Farmer Factsheet
- ✓ 823 Producer Pre-Office Visit Checklist
- ✓ Watch a webinar led by farmers on 823
- ✓ NRCS New Practice for Transitioning Land (pg. 10)
- ✓ Unlocking Funding for Organic Practices (pg. 34)
- ✓ Do you have more to say on this topic? Join OFA's Farmer Workgroup

The National Resources Conservation Service (NRCS) has many programs to help farmers convert to organic farming operations, including the Environmental Quality Incentives Program (EQIP) conservation program.

Under EQIP, Organic Transition Initiative 823 (OTI) is specifically meant to help those transitioning to organic operations through cost-sharing and providing technical support on such practices.

This program is relatively new and can be used by many farmers. Use OFA's resources to learn more, and reach out with your questions.

CONTACT OFA

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Highly Pathogenic Avian Influenza Virus: An Update on H5N1 in Mammals

By Ed Maltby

Since 2022, there have been increasing reports of deadly outbreaks among mammals also caused by influenza A(H5)—including influenza A(H5N1)—viruses. Both land and sea mammals have been affected, including outbreaks in farmed fur animals, seals, sea lions, and detections in other wild and domestic animals such as foxes, bears, otters, raccoons, cats, dogs, cows, goats, and others.

Despite the time that the trifecta of agencies (USDA, FDA, CDC) took to recognize and act on it, bird flu, H5N1, does exist in dairy cows and is transmitted by cows' milk, contact between cows, and milking equipment, and to humans who work closely with cows.

Examining tissues of infected dairy cattle revealed that both the cows' mammary glands and respiratory tissues had receptors for flu strains that originated from birds, as well as humans and pigs, [Iowa State University wrote in a news release](#) explaining the research.

It is present in raw milk from sick cows, but currently there are no reports of human sickness from drinking raw milk. [Authorities advise](#) consumers not to drink raw milk and have completed rigorous testing on pasteurized milk including the standard High Temperature Short Time (HTST) that shows the virus is not active once it is pasteurized.

[From an organic certification point of view, state and federal spokespeople have repeatedly stated that there is not a greater threat to cows that spend more time on pasture.](#)

CURRENT ACTIONS & STATUSES

H5N1 is here to stay, and the current administration's intention is to combat avian flu in poultry by moving away from mass culling of infected flocks and prioritizing enhanced biosecurity measures and medication to control the spread of the virus.

In February 2025, the [USDA announced](#) it would invest up to \$1 billion to combat avian flu and reduce egg prices, but around the same time [nearly 1,300 officials working on bird flu were fired](#) from the USDA. While these firings were said to be accidental and the termination letters rescinded, it's still unclear if the employees have been reinstated.

Recently, Secretary of Agriculture Brooke Rollins said the [five-pronged approach to bird flu](#) which included vaccines, therapeutics, and other strategies to protect egg-laying chickens and reduce depopulation, was now "off the table" in a [March interview](#).

Since early 2024, Animal and Plant Health Inspection Service (APHIS) has reported 977 H5N1 detections in dairy cattle from 17 states. Of these outbreaks, 730 have been in California, where 70% of the herds have dealt with H5N1, and milk production fell by 9.3% in November. Since February 1, 2025, 36 new cases of H5N1 in dairy cows have been reported, including the first cases in Nevada and Arizona.

The costly financial and milk production consequences of H5N1 infections in U.S. dairy have been laid bare in [research](#) from March 2025.

Current Actions cont.

Economic losses due to decreased milk production, mortality, and early herd removal were estimated at \$950 per clinically affected cow for a total cost of approximately \$737,500 for the herd during the observation period. [Early research results](#) demonstrate a long-lasting production impact and significant financial consequences of Highly Pathogenic Avian Influenza (HPAI) H5N1 virus infection to dairy farms.

[A new study indicates](#) that HPAI is more prevalent in dairy cows than previously reported. Scientists have identified a concerning genetic mutation, PB2 E627K, in four dairy cow herds in Texas. This mutation, linked to increased mammal-to-mammal transmission, was also found in the first human case in March 2024. While the USDA is not changing its policy on dairy cows infected by H5N1 or seemingly trying any new approaches, [Elanco Animal Health](#) has signed an agreement with South Dakota biotech firm Medgene to commercialize its bird flu vaccine in cattle. In February, Elanco said the Medgene vaccine was in the final stages of review for a conditional license and has met USDA's platform technology guidelines. It's uncertain if or when the vaccinations will become available.

**Read insights gathered for
The American Dairy Coalition's
December 2024 webinar about
H5N1 in dairy.**

READ MORE




HUMAN INFECTIONS

The outbreak has infected dozens of people, mostly farm workers. So far, most people infected experience mild illness and eye inflammation, and the virus is not spreading between people. The first H5N1 death in the U.S. was reported in January 2025 following exposure to infected chickens. One of the earliest strains of avian influenza isolated from a human in Texas shows a unique collection of mutations that enables it to more easily replicate in human cells, researchers from [Texas Biomedical Research Institute \(Texas Biomed\)](#) reported.

The finding highlights a key concern about the H5N1 strains of avian influenza currently circulating in the U.S. and the speed at which the virus can mutate when introduced to a new host.

MOVING FORWARD WITH AVIAN FLU

Organic farmers have struggled to find consistent, applicable information to inform decision making about the bird flu at the farm level. Multiple changes have impacted farms already this season. Changes in the way the current administration is approaching the virus, as well as chick shortages, shipping delays, milk production shortages, and calf prices, which cause significant challenges to production and workflow, not to mention balance sheets.

At this time, one action we can take is to educate ourselves and share information with one another. If you or someone you know raises animals experiencing what they think might be avian flu symptoms, please share the [OFA Farmer HelpLine number \(833-724-3834\)](#) with them. OFA's Farmer Services team share support resources, make anonymous calls on your behalf, and connect you with others who might be able to help. 

**Content used for this article was originally published by [NODPA](#) in [July 2024](#) and [March 2025](#)*



Ed Maltby is the Executive Director of NODPA and has served on OFA's Governing Council and Policy Committee. Ed is a producer with over 55 years experience managing conventional and organic dairy, beef, sheep, and vegetable enterprises on a variety of different farms in Europe and the United States. For the past 30 years, Ed has worked with regional farms to cooperatively market their products into mainstream markets.

Combating HPAI in a Pasture-Raised Poultry Operation

At Greener Pastures Chicken in Elgin, Texas, we're tackling the Highly Pathogenic Avian Influenza (HPAI) challenge while upholding our pasture-raised organic standards. In our experience, proper training and strong biosecurity protocols are the most effective defenses.

We've established distinct biosecurity zones with restricted access, allowing only essential personnel on site. All employees use dedicated clothing and footwear that remain in designated areas. Foot baths with organic-approved disinfectants guard every entry point, and we maintain a strict sign-in system for visitors. We have always prohibited employees from raising their own birds for the safety of our flocks.

Our rotational grazing system allows each previously grazed section of land to "rest" for weeks, reducing pathogen buildup. This approach provides chickens with natural outdoor access while minimizing risks. We eliminate standing water and keep all feed in covered containers with immediate cleanup of spills in an effort to mitigate pressure from migratory birds.

We follow thorough cleaning protocols in our brooder and mobile coops between flocks. Equipment, vehicles, and clothing undergo regular disinfection according to a strict schedule. Our "clean zone" policy keeps areas around mobile coops free of debris, overgrown vegetation, and spilled feed.

Daily health checks have become more rigorous, with staff trained to identify early warning signs of illness. We maintain isolation areas for any suspicious birds and work closely with our veterinarian, who provides regular consultations and emergency support.

We source exclusively from NPIP-certified hatcheries with excellent health standards and track all bird movements and health observations through our digital record-keeping system.

At Greener Pastures, we believe that strong biosecurity and authentic organic, pasture-raised practices can coexist, creating a more resilient and sustainable operation for the future. 🌱

Cameron Molberg has been working in organic agriculture for over 16 years with a focus on regenerative organic production systems. Known to some as an "encyclopedia in blue jeans," Cameron serves as a resource for farmers, consumers, and organizations across the country. Greener Pastures Chicken actualizes a vision of happy chickens, regenerative organic agriculture, and a better food system for all.





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Thank you, Organic Dairy Farmers

Our mission is to sustain family dairy farms in the North Bay region of California by producing high quality and minimally processed organic dairy products for consumers to enjoy. Amidst great challenges to the industry, our purpose is more important than ever. We are grateful for the tremendous partnership and personal relationships we have with our network of dairy farming families. Thank you to the Straus, Tresch, Hughes, Correia, Silacci, Mendoza, Nunes, Spaletta, Moretti, R. McClelland, Nosedchi and Bordessa family farms for your incredible organic land stewardship and positive contributions to our local community.

Learn more about our 2030 carbon neutral dairy goal and structured commitment to economic resilience for dairy farms at www.strausfamilycreamery.com

A full-page background image of the U.S. Capitol building in Washington, D.C. The image shows the iconic white dome and the neoclassical facade with its many columns. The building is reflected in a pool of water in the foreground. The sky is a clear, bright blue.

OFA POLICY

New OFA Policies for 2025

By Lily Hawkins

HOW OFA'S POLICY PROCESS WORKS

Each year, OFA initiates its policy work by surveying U.S. certified organic farmers and organic farm organizations. This comprehensive survey gathers crucial input on policy priorities and positions, ensuring a broad and representative range of farmer voices are heard from the outset. This intentionally inclusive process puts farmers at the forefront of OFA's advocacy efforts.

Next, the [OFA Policy Committee](#) meticulously reviews the survey results. OFA members then provide comments on these proposed policies, helping to refine and narrow down the focus to actionable and high-impact priorities. The final step in this democratic process involves OFA organic farmer members voting to accept or reject these policy positions.

ADOPTING NEW POLICIES

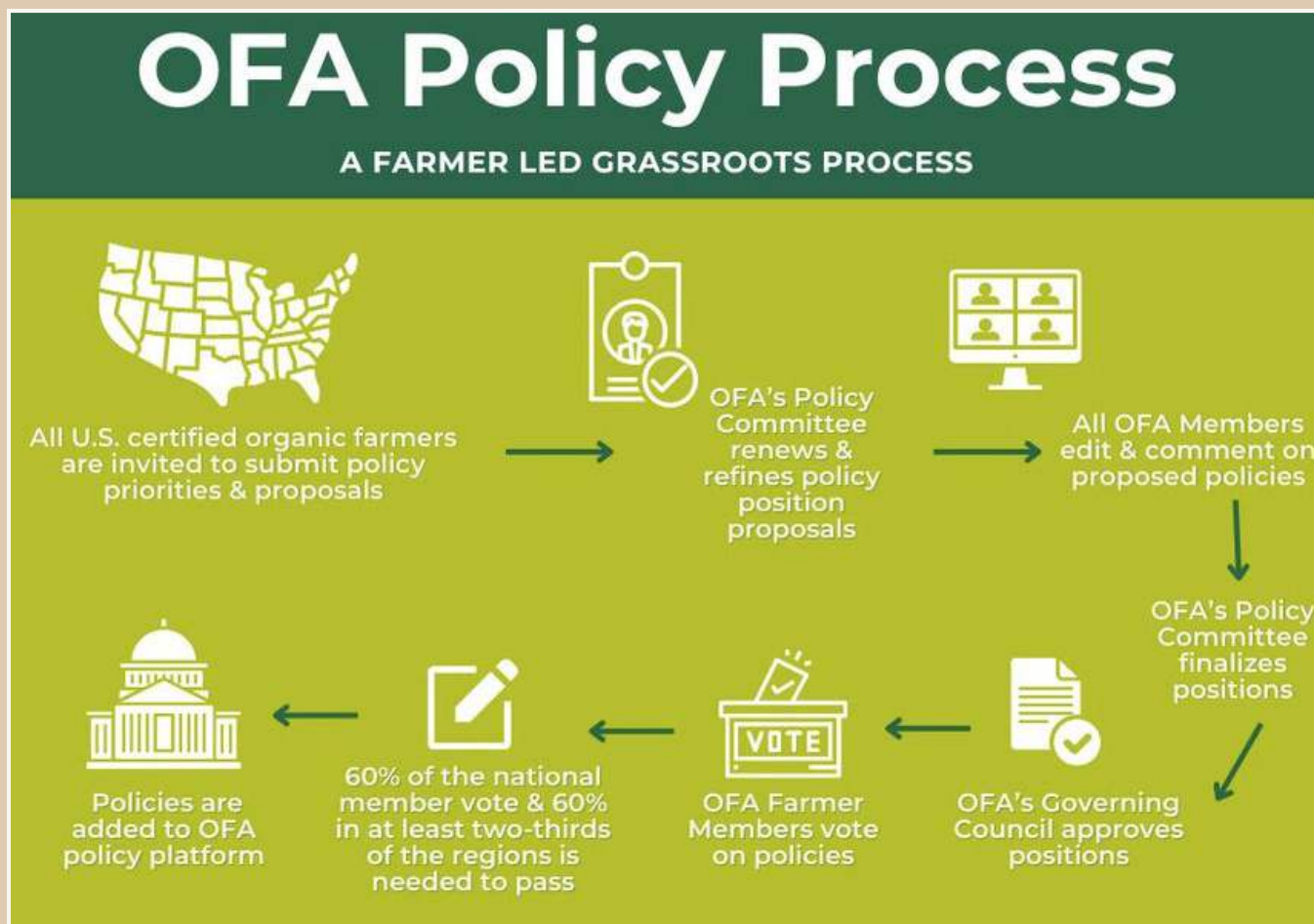
For a policy proposal to be officially adopted by OFA, it must achieve significant support: a 60% national farmer member popular vote and 60% popular support in at least two-thirds of the six designated regions. Once adopted or revised, these policies become integral to the OFA Policy Platform, guiding all of OFA's future advocacy work.

2025 POLICY OUTCOMES & FEDERAL ADVOCACY

This year, all proposed policies and revisions received the necessary votes for adoption. These newly approved policies will steer OFA's advocacy, particularly throughout the extended Farm Bill cycle. While the future of the next Farm Bill is uncertain, OFA continues to advocate for its priority policies Washington D.C.

2025 TOP ORGANIC POLICY PRIORITIES

- Organic Import Fraud (56%)
- Ensuring the Strengthening Organic Enforcement (SOE) Rule does not burden small and mid-sized farmers (36%)
- Prohibiting Hydroponics in Organic Production (36%)
- NOP Enforcement to Ensure Organic Integrity (33%)
- Dismantling Corporate Consolidation within the Organic Market (33%)
- Affordable Organic Certification Solutions for Small & Mid-sized Low-Risk Operations (28%)
- Organic Certification Cost Share (increasing support) (26%)
- NRCS: EQIP, CSP, CRP Programs for Extended Organic Support (24%)
- Climate Change (19%)
- Crop Insurance Improvements for Organic Producers (17%)



BEGINNING FARMER & TECHNICAL ASSISTANCE

Since early this year, the federal landscape has been rapidly shifting. With changing priorities under the second Trump administration, funding USDA programs and grants has been unpredictable, with wide ranging impacts for the agricultural community.

We received survey responses in favor of increasing the funding limit of federal programs that support beginning farmers. Land access and access to capital are important issues for beginning farmers, and depending on the location of the farm, funding limits for programs like the Direct Down Payment Loan Program and the Direct Farm Ownership Loan do not provide sufficient support to help farmers gain the land ownership or access they need to be successful.

Instead of creating a policy that specifically identifies funding expansion, the Policy Committee proposed edits to an existing policy to give OFA more focused support to advocate for increased funding for USDA programs that support beginning farmers.

Updated Policy:

OFA SUPPORTS programs and outreach that improve access to capital for owner/operators, especially small-scale operators, pursuing or maintaining organic certification by creating and maintaining targeted, accessible federal and state grants and loans for farmers to enter long-term leases, to purchase agricultural land, to cover farm operating expenses, and to obtain operating capital for equipment, facilities, etc. and increased funding and higher funding limits for existing programs with those goals. (Adopted by the farmer membership in 2023 and updated in 2025.)

This is an update to the previous policy: OFA SUPPORTS programs and outreach that improve access to capital for small farmers pursuing or maintaining organic certification by creating and maintaining targeted, accessible federal and state grants and loans for farmers to enter long-term leases, to purchase agricultural land, to cover farm operating expenses, and to obtain operating capital for equipment, facilities, etc. (Adopted by the farmer membership 2023.)

COST SHARE FOR ORGANIC CERTIFICATION

One USDA program OFA has been watching especially closely is the Organic Certification Cost Share program. This program is essential to organic farmers and increases the ability for many farmers to afford the growing organic certification costs. However, funding for the program has faced a great deal of uncertainty because it lacks “baseline” funding in the Farm Bill. This means that every time the Farm Bill is extended, the extension must be written in a certain way to fund cost-share.

We received many comments about the cost-share policy development. The policy committee felt one idea merited a new policy, and two existing policies could be improved by edits from comments received from farmers in the 2025 policy survey.

New Policy:

OFA SUPPORTS organic farmers NOT bearing the cost of organic certification. (Adopted by the farmer membership in 2025.)

Updated Policy:

OFA SUPPORTS the expansion of the Organic Certification Cost Share program and other federal programs to cover certification fees for farms, as certification fees have proven to be a barrier to program entry and have caused farms to leave organic certification. The program funding levels shall be annually reviewed to account for inflation and the cost of living, and expanded to a minimum of \$1500 per scope with 100% reimbursement. (Adopted by the farmer membership in 2023 and updated in 2025.)

This update replaces: OFA SUPPORTS expansion of the Organic Certification Cost Share program to cover certification fees for small farms as certification fees have proven to be a barrier to program entry and have caused small farms to leave organic certification. The program should expand to a minimum of \$1500 per scope with 100% reimbursement. (Adopted by the farmer membership 2023.)

CONTAMINATION

The organic community is hopeful that increased federal interest in “food as medicine” and reducing harmful contaminants in food will lead to increased support for the National Organic Program, and solutions to the problem of outside contamination of farmland.

One of OFA’s core values states: “Organic farmers have the right to farm without contamination from genetically engineered crops, synthetic pesticides, and other environmental contaminants.” We received four comments in 2025 asking for more emphasis on protecting organic farmers from contamination. In vetting these comments, the Policy committee felt there was one worth the merit of a new policy, and a number of comments merited editing an existing policy to encompass those expanded priorities, specifically adding that chemical manufacturers should be held accountable for contamination from their products.

New Policy:

OFA SUPPORTS banning Dicamba (3,6-dichloro-2-methoxybenzoic acid). (Adopted by the farmer membership in 2025.)

Updated Policy:

OFA SUPPORTS increased enforcement and fines against, prevention of, and compensation for losses associated with damage caused by genetic engineering, pesticide, and other chemical contamination of organic farms or crops. The manufacturers and applicators of these chemicals and technologies shall be held responsible and liable for their role in the contamination. (Adopted by the farmer membership in 2018 and updated in 2025.)

This revises: OFA supports prevention of, and compensation for losses associated with, damage caused by genetic engineering and pesticide contamination of organic crops and other affected areas. (Adopted by the farmer membership 2018.)

CROP INSURANCE

Crop insurance can be difficult to access, or not useful to organic farmers. For several years now, OFA has been convening a workgroup to discuss policy changes that could improve risk management options for organic producers.

Crop insurance policies align with conventional commodity agriculture practices. But organic farmers have additional standards to which they are accountable. One such requirement is the 36 months of transition after the application of a prohibited substance in order to move from non-organic to organic farming. Another such standard is the requirement for a soil-building crop rotation.

Actual Production History (APH), is a metric used to calculate crop insurance guarantees over time. It’s an average, and until enough years of history have been built up, other county metrics, the county T-yields, are used in place of “real” data. Many beginning, transitioning, and organic farmers report that the county T-yields are not an accurate reflection of their potential yields, often grossly underestimating what can be produced by a beginning, transitional, or newly organic farmer on the land, and thereby also grossly under-protecting that farmer through crop insurance. For example, one OFA farmer grew hard red winter wheat last year, averaging 75 bu/acre. 65-90 bu/acre is typical for his area. The county T-yield, however, is somewhere around 40 bu/acre. Even after averaging in the new year with 75 bu/acre yield, the farmer’s guarantee is only at around 45 bu/acre.



This is particularly difficult for transitioning producers because the current system requires the APH to start all over again every time a “new practice” (such as certified organic farming) begins. So, transitioning producers bear more of the risk both during transition and in the early years of certification, merely due to the way the system is set up.

Further, organic farmers must have a soil-building crop rotation. This makes it more challenging for an organic farmer to build up their Actual Production History with “real” data because they are often growing multiple crops in succession. This presents a long-term disadvantage for organic farmers in the crop insurance system. With just a 3-crop rotation, it can take 15 years to build up enough “real” data for an organic farmer to be using their own actual production history, which is a 5-year average. This negatively impacts the organic farmer’s guarantee for multiple years in a row, illustrating how this system systematically disadvantages beginning, transitional, and organic farmers.

New Policy:

OFA SUPPORTS beginning, organic, and transitioning farmers being systematically supported by the county T-Yield and the Actual Production History (APH) rather than being disadvantaged by how these levels are established, which was not designed for longer diversified crop rotations. (Adopted by the farmer membership in 2025.)

All these new and updated policies are a reflection of ongoing farmer policy priorities in the Farm Bill and beyond. To read more about the marker bills OFA is advocating for, follow our **Marker Bill Tracker**.

Lillian Hawkins is Policy Director of Organic Farmers Association. She ensures the policy priorities of certified organic farmers are represented in Washington, D.C.



TAKE ACTION!

Organic Farmer voices matter in D.C.

Did you know you can download OFA's current advocacy factsheets to get the most relevant information on an organic farming policy. Plus, you can use these factsheets to communicate key points with your legislators when you advocate for organic farming!



Download a Factsheet

And don't forget to browse OFA's current Action Alerts to find where your voice is needed most to protect organic food and farms!

Send a letter to your legislator to:

- Sign on your Support to Fight Organic Grain Fraud
- Urge Congress to Support Organic Farmers in the Farm Bill
- Protect Federal Funding for Farm and Food Programs

Write a Letter

A person wearing a bright yellow raincoat is holding a large bunch of green onions with their roots still attached. They are standing in a field of similar green onions. The background is slightly blurred, showing more of the field and a clear sky.

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- Working with NRCS
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Join organic educator Harriet Behar



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A Recap of the Spring National Organic Standards Board Meeting

By Harriet Behar

The National Organic Standards Board (NOSB) met virtually in spring 2025 due to federal funding restrictions that cancelled the in-person meeting planned for Tucson, AZ. Ten hours of virtual public comments were held April 22 and 24, with the NOSB discussing a variety of issues April 29-May 1.

Each spring's meeting introduces the list of generic materials included on the National List due for their once-every-five-year sunset review. The organic community reviews items on the crops, livestock, and handling lists, and in the fall, the NOSB will vote whether to retain or remove these materials. The board asks questions such as: Is the item essential for the organic community? Has a new, perhaps less toxic material, become available since the last review, and is it time to remove the current item from the list?

CROP SUNSET MATERIALS

In crops, the following sunset materials were discussed and will be voted upon in the fall: **potassium hypochlorite, soap based algicides, ammonium carbonate, insecticidal soaps, vitamin D3, aquatic plant extracts, lignin sulfonate, fatty alcohols, sodium silicate, EPA list four inerts, and paper for production aids** (paper pots). **Arsenic** and **strychnine** are on the prohibited natural list. If any of these items are important to your operation, the NOSB would like to hear from you before they vote this fall. While a few items had more scrutiny than others, none seemed in danger of being removed from the National List of approved synthetics or prohibited naturals, but this could change.

The crops subcommittee also reviewed the use of **pear ester** as a kairomone (similar to a pheromone) for organic fruit production. This material can be used in traps or microencapsulated using plastic and sprayed in an orchard. The NOSB discussed having an annotation that only allows its use in traps, and will bring this back in the fall for a vote.

COMPOST INGREDIENTS

The board discussed two documents concerning ingredients allowed in compost used on organic land. The first proposal, which was approved unanimously, states that only the NOSB can decide if synthetics can be allowed in compost used on organic land. Two years ago, a trade organization approached the National Organic Program (NOP) and tried to have the rule changed without going through the NOSB review process.

The second document discussed by the NOSB reviewed the parameters of what types of synthetics, specifically plastics, that might be allowed in organic-approved compost, including at what volumes, for this fall's proposal. Discussion on this topic covered the types of "biodegradable" plastics, allowing for produce stickers, allowing single-use plastics for potential inclusion in this document.

The Organic Farmers Association provided public comment on this issue, stating we do not want any single or biodegradable plastics in organic-approved compost and we are reviewing whether the produce stickers might be considered Unavoidable Residual Environmental Contamination (UREC).

There was good board discussion on whether or not nano and/or microplastics negatively affect soil biology, contaminate food grown on the land, or contaminate ground or surface waters. Some research has demonstrated that crops can uptake these microplastics and end up in the food and humans/livestock, and that they do appear in the water too. The board plans to review emerging science on the interaction of plastics and the soil microbiome.

PAPER PRODUCTION AIDS

Paper production aids were discussed in detail, in relation to whether or not there are synthetics in the paper that could build up after repeated use in the soil, and which types of synthetics are present (adhesives, bonding materials, fibers, PFAS, etc.). More information will be available in the fall.

LIVESTOCK

The livestock subcommittee began its discussion by noting that more expertise in livestock production is needed on the NOSB. Five new members of the NOSB will be chosen this fall, with nominations due sometime early summer; the date for applications is not yet set. Please contact

Harriet@OrganicFarmersAssociation.org if you are interested in serving on the NOSB, or can recommend a livestock farmer.

LIVESTOCK SUNSET MATERIALS

Livestock sunset proposals included **butorphanol, flunixin, magnesium hydroxide, oxytocin, poloxalene, formic acid, sucrose octanoate esters, EPA list four inerts, excipients, and strychnine** (prohibited). **Oxytocin** had been voted to be removed by the NOSB five years ago, but the NOP did not remove it. The NOSB now plans to add an annotation to oxytocin, specifying that it is only allowed for emergency use and only for a few days after giving birth, perhaps only under the oversight of a veterinarian. The NOSB discussed whether or not **Sucrose Octanoate Esters**, used in beekeeping to control mites, is being used. The NOSB would like to hear from beekeepers on this material, both within and outside of the U.S. The remainder of the livestock materials did not have any controversy that would lead to their removal.

The NOSB voted to annotate **iodine** used in livestock production to not allow NPE (nonylphenol ethoxylate) as an ingredient.

This has been discussed for a few years, but it appears iodine without NPEs is now readily available; and NPEs (endocrine disruptors) are also being phased out in conventional livestock production.

RISK-BASED CERTIFICATION DOCUMENT

Risk-based certification, a very detailed document of guidance for certifiers, is going back to the subcommittee for further refinement and a possible vote in the fall. Since the recent implementation of the Strengthening Organic Enforcement (SOE) regulation, organic farmers have experienced burdensome tracking and paperwork requirements. The NOP has been very clear that this rule was meant to oversee fraud at a larger scale, and small- to mid-sized farmers should not be burdened with excess paperwork, labeling, and tracking. Farmers do not need to have three different documents to prove which seed they planted; one is sufficient.

RESIDUE TESTING

Residue testing for the global supply chain was proposed by the NOSB in a wide-ranging, well-written, and detailed document. This proposal provides a road map for the NOP and certifiers for how to use residue testing, including what should be tested, where in the supply chain, and who does the sampling, among other aspects. This proposal closes the gaps in the current NOP guidance on this issue. NOSB members mentioned numerous times that farmers asked for this type of testing as both a deterrent and as a way to catch fraud in the supply chain. The NOP gave a review on their enforcement activities and stated that a large “organic” shipment from Turkey was refused recently, and they are working with certifiers to enforce the new animal welfare standards, Organic Livestock and Poultry Standards (OLPS).

Coming up this fall, a new item on the work agenda will be added in response to a request from the Organic Farmers Association. The NOSB will discuss **Integrating livestock into an orchard or other agroforestry situations** to determine if the current rules should be modified to allow livestock during the growing season. This issue was brought to OFA's attention from organic farmers who participated in our [Annual Policy Development Survey](#). If you have experience grazing livestock in agroforestry situations and can provide comments on this issue, please reach out to Harriet@OrganicFarmersAssociation.org.

The fall NOSB meeting will be held at in early November in Omaha, NE.

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Investigates violations, enforces organic regulations, and takes action against operations that misuse the organic label or fail to comply with standards.

Standards Division

Develops and maintains the organic regulations and standards that define what can be labeled as organic, including allowed and prohibited substances.

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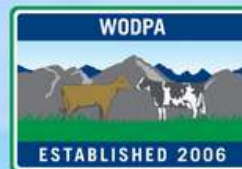
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