



CALIFORNIA DEPARTMENT OF  
FOOD & AGRICULTURE

Karen Ross, Secretary

## CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE CALIFORNIA ORGANIC PRODUCTS ADVISORY COMMITTEE

### MEETING NOTICE

**The meeting will be conducted via Zoom only**

Zoom Meeting ID: 960 8697 4192

Passcode: 936479

Dial-in Number: 833-548-0276

Link: <https://zoom.us/j/96086974192?pwd=QkIFTkhtRnN3UVBMUFdaM0VmS0hUUT09>

Please keep yourself on mute during the meeting and wait to be called by the Chair before speaking. Please identify yourself before speaking.

#### Committee Members

Karen Archipley, Chair

Kaley Grimland

Benjamin Diesl

Philip LaRocca, Vice Chair

Blake Alexandre

Rosalie Burkett

Jeremy Johnson

Jamie Nessel

Jaclyn Bowen

Michael Menes

Alexis Randolph

Wendy Reynolds

John McKeon, Alternate

Sean Feder, Alternate

#### Public Participation

Members of the public are encouraged to provide comment to the California Organic Products Advisory Committee (Committee) and may suggest items to be placed on the agenda for discussion at the next Committee meeting. While the Committee values the participation of the public, the Committee Chairman reserves the right to limit the time for public comment per speaker, as needed, in order to proceed with the agenda.

#### Americans with Disabilities Act

All Advisory Board or Committee meetings must be accessible to the physically disabled. Any person needing a disability-related accommodation or modification in order to attend or participate in any Advisory Board or Committee meeting may request assistance by contacting Mitchell King at (916) 900-5030 or [mitchell.king@cdfa.ca.gov](mailto:mitchell.king@cdfa.ca.gov) or by mail at 2800 Gateway Oaks Drive, Sacramento, California 95833

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<http://cdfa.ca.gov/is/uploader/postings/hearings/>



**CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE  
CALIFORNIA ORGANIC PRODUCTS ADVISORY COMMITTEE**

**MEETING AGENDA**

**Thursday, September 17, 2020**

**10:00 am – 2:00 pm**

Zoom Meeting ID: 960 8697 4192

Passcode: 936479

Dial-in Number: 833-548-0276

Link: <https://zoom.us/j/96086974192?pwd=QkIFTkhtRnN3UVBMUFdaM0VmS0hUUT09>

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Items

- (1) CALL TO ORDER
- (2) INTRODUCTIONS
- (3) ROLL CALL – Establish Quorum
- (4) PUBLIC COMMENTS – Limited to items not on the agenda
- (5) REVIEW OF MEETING MINUTES
  - i. January 23, 2020
  - ii. May 7, 2020
- (6) LEGAL PRESENTATION – Kara Breevaart, Michele Dias, CDFA Legal Office
  - i. COPAC Authority
  - ii. Bagley-Keene
  - iii. Conflict-of-Interest
- (7) ORGANIC INPUT MATERIALS REGISTRATION PROCESS – Natalie Krout-Greenberg, Director, CDFA Inspection Services Division; Martin Burger, Senior Environmental Scientist, Feed, Fertilizer, Livestock Drugs Regulatory Services Branch, CDFA Inspection Services Division
- (8) CORRESPONDENCE – CDFA Legal Office
- (9) ORGANIC SLAUGHTER FACILITIES UPDATE – Program Staff, Thea Rittenhouse, CDFA Farmer Equity Advisor

- (10) CALIFORNIA DEPARTMENT OF PUBLIC HEALTH UPDATES – CDPH Staff
  - i. Food Safety Fund Update
  - ii. Funds Collected from Organic Registration
  
- (11) STATE ORGANIC PROGRAM UPDATES – Program Staff
  - i. Vacancies and Terms Report
  - ii. Compliance and Enforcement Summary
  - iii. Complaint Activity Report
  - iv. Complaint Summary Log
  - v. Pesticide Sampling Report
  - vi. Cost Share Program
  - vii. New Registrations
  - viii. Impact of COVID-19 on Organic Activities
  - ix. Revenue from Registration
  - x. Fund Condition Update
  
- (12) NEXT MEETING/AGENDA ITEMS
  
- (13) ADJOURNMENT

### **Public Participation**

Members of the public are encouraged to provide comment to the California Organic Products Advisory Committee (Committee) and may suggest items to be placed on the agenda for discussion at the next Committee meeting. While the Committee values the participation of the public, the Committee Chairman reserves the right to limit the time for public comment per speaker, as needed, in order to proceed with the agenda.

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**CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE (CDFA)  
CALIFORNIA ORGANIC PRODUCTS ADVISORY COMMITTEE (COPAC)**

**January 23, 2020**

**Meeting Minutes**

**800 Asilomar Ave. Pacific Grove, CA**

**MEMBERS PRESENT**

Karen Archipley – Chair  
Phillip LaRocca – Vice Chair  
Jeremy Johnson  
Jaclyn Bowen  
Michael Menes  
Kaley Grimland  
John McKeon  
Alexis Randolph  
Rosalie Burkett  
Stacy Carlsen  
Benjamin Diesl  
Blake Alexandre

**MEMBERS ABSENT**

Sean Feder

**INTERESTED PARTIES**

Kent Reick  
Jane Reick, California Dept. of  
Public Health (CDPH)  
Jane Sooby, California Certified  
Organic Farmers (CCOF)  
April Crittenden (CCOF)  
Deborah Stemwedel, California  
Organic Fertilizers Inc.

**CDFA**

Carla Sanchez  
Thomas Osborn  
Mitchell King  
Rick Jensen  
Marcee Yount  
Scott Renteria  
Mayze Fowler-Riggs  
Danny Lee  
Pam Rodriguez  
Andrea Cano  
Steve Patton  
Dale Woods  
Charlene Graham  
Annie Kim  
Ryan Bailey  
Javed Iqbal

**ITEM 1: CALL TO ORDER-INTRODUCTIONS/ROLL CALL**

The meeting was called to order at 12:33 p.m. by Karen Archipley, Chair, and self-introductions were made. Roll was called by Mitchell King and a quorum was established.

**ITEM 2: ELECTION OF OFFICERS**

King informed the Committee of the need to conduct elections for both Chair and Vice-Chair.

Jeremy Johnson nominated Karen Archipley for Chair. There were no other nominations for Chair. Archipley was elected unanimously with no abstentions.

Chair Archipley nominated Philip LaRocca for Vice Chair. There were no other nominations for Vice Chair. LaRocca was elected unanimously with no abstentions.

### **ITEM 3: PUBLIC COMMENTS**

Chair Archipley opened the floor for public comments. A member of the public asked if there would be time for public comments at the end of the meeting, Chair Archipley replied that there would be time at the end of the meeting. There were no public comments at this time.

### **ITEM 4: REVIEW AND APPROVAL OF SEPTEMBER 26, 2019 MEETING MINUTES**

Chair Archipley requested a motion to approve the September 26, 2019 Meeting Minutes as submitted.

**MOTION:** Philip LaRocca moved to approve the September 26, 2019 Meeting Minutes as submitted. Blake Alexandre seconded the motion. The motion passed unanimously, with no abstentions.

### **ITEM 5: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH UPDATES**

Jane Reick of the California Department of Public Health (CDPH) Food and Drug Branch, Organic Program, provided the CDPH update on behalf of Wendy Reynolds due to Reynolds' absence. Reick presented data pertaining to the CDPH organic complaints for the 2017-18 and 2018-19 fiscal years (FY). Reick also presented the CDPH Food and Drug Branch Organic Program Fund Condition. The Program has a projected revenue of \$1,178,578 for the 2018-19 FY, and a projected revenue of \$1,174,806 for the 2019-20 FY with projected expenditures of \$583,989.

There was brief discussion between Reick and Jaclyn Bowen on the nature of pending complaints from previous years. Reick explained that complaints may not have enough detail in them to allow CDPH to locate the party identified in the complaint. This lack of detail can lead to complaints that remain pending.

A discussion between Johnson and Reick ensued after Johnson asked about bills of lading. Reick explained that bills of lading are required by law and CDPH will continue to require them. Johnson also asked Reick to explain the excess money collected from organic processors. Reick informed the Committee that there have been discussions about ways to spend down this excess, such as providing training and development of information sheets and webinars. Reick explained that these discussions are ongoing and CDPH plans to provide more information in a future COPAC meeting. Johnson expressed desire to see the excess funds collected from organic processors used specifically for organic products.

Bowen asked Reick about the use of excess money from the organic industry. Johnson explained that this excess money is placed into a general fund that is used for the conventional as well as the organic industry. Johnson asked Reick to provide information at the next COPAC meeting detailing how much of the money in the Food Safety Fund comes from the organic industry and what percentage of that is being used on organic enforcement as opposed to conventional enforcement activities.

**MOTION:** Phillip LaRocca moved to ask CDPH to present at the next Committee meeting an analysis of where the funds from organic processors are being spent and how the excess discussed was accumulated. Jaclyn Bowen seconded the motion. The motion passed unanimously, with no abstentions.

Stacy Carlsen noted that further discussion of this motion was needed and suggested an amendment to the motion to ask CDPH to bring the Committee a chronology of budget actions that take place in CDPH to allow the Committee to track suggested changes with CDPH processes and dates. Carlsen asked that this be given as a procedural timeline so the Committee can better understand CDPH's internal processes. Phillip LaRocca accepted this amendment.

**MOTION:** The Committee requests that CDPH provide details on what funds from organic processors are being used for, as well as details on how excess funds from organic processors are used, and the details of how the Food Safety Fund is utilized. CDPH should also provide a chronology of internal processes for budgeting. Jaclyn Bowen seconded the amended motion. The motion passed unanimously, with no abstentions.

Reick informed the Committee that CDPH is working to arrange a meet-and-greet with certifying agencies throughout the state of California with one event in northern and southern California respectively. These events are to allow certifiers in the organic industry to meet with CDPH staff. Reick also stated that the 2017-19 CDPH Organic Program Reports are posted online.

Bowen asked if there was a way that the Committee could receive further information on the complaints listed by CDPH in their report similar to information presented by CDFA in the past. Chair Archipley also expressed that this would be beneficial to the Committee.

**MOTION:** Jaclyn Bowen moved to ask that CDPH provide the Committee with a report on the status of complaints, including a timeline with the nature of the complaints CDPH has received. Jeremy Johnson seconded the motion. The motion passed unanimously, with no abstentions.

## **ITEM 6: STATE ORGANIC PROGRAM UPDATES**

### i. Vacancies and Terms

King provided the Committee Vacancy and Terms Report. Current vacancies include five voting member positions: one producer representative, one technical representative, one consumer representative, one wholesale distributor representative, and one retail representative. There are also 13 alternate vacancies including: five producer alternates, one wholesale distributor alternate, two processor alternates, one consumer representative alternate, one environmental representative alternate, two technical representative alternates, and one retail representative alternate. King also introduced the newly appointed members and provided the names of members who will

be eligible for reappointment as of October 31, 2020. There are no members terming out in 2020.

ii. Communications Update

Danny Lee provided the Communications Update. Lee informed the Committee that the new COPAC website is live and available. Lee also mentioned to the new Committee members that the COPAC site includes space for member biographies, which can be completed voluntarily.

iii. Compliance and Enforcement/Appeals Summary

Scott Renteria presented the Compliance and Enforcement/Appeals Summary. Renteria reminded the Committee that the numbers presented in the summary do not reflect the complexity of the individual complaints themselves. Renteria noted that in the first half of the 2019-20 FY, the State Organic Program (SOP) received 42 complaints. Of those complaints, 24 have been investigated by the SOP. Three of these complaints were referred to an accredited certifying agency for investigation. Eleven complaints were referred to the CDPH, two were referred to the National Organic Program (NOP) as these operations existed outside of California. Two complaints were referred to the Organic Input Materials Program within CDFA. Johnson asked Renteria if it is within CDPH's purview to send notifications to retailers about products that are not certified. Renteria explained that the NOP issues Letters of Information to retailers on products that are not certified.

Renteria provided the Inspections Summary. In the 2018-19 FY, 1,700 inspections were performed in total. In the first half of the 2019-20 FY, 573 inspections were conducted. Renteria noted that much of the inspection activity occurs in the second half of a fiscal year. Renteria also provided the Sampling Summary to the Committee. There was brief discussion between Renteria and Johnson regarding what percentage of complaints at farmers' markets lead to notices of noncompliance. Renteria explained that this data is available, and SOP is working to include it in reporting. A brief discussion between Renteria, Johnson, Carlsen, and Chair Archipley ensued during which the level of detail in the summary was discussed.

iv. Complaints Activity Report

Renteria presented the Complaints Activity Report. SOP reported 11 active complaints currently under investigation. In the six months prior to the report, 31 complaints were closed. There were four complaints open for longer than three months. Renteria stated that these complaints were more complex in nature. Renteria also described how complaints were assigned to SOP staff and other investigators. Renteria noted that when a complaint is referred to a county agricultural commissioner, or a certifier, SOP still oversees the investigation but is using the resources available from county staff or certifiers.

v. Complaint Summary Log

Lee presented the Complaint Summary Log. Lee stated that the information provided in the Complaint Summary Log is information from investigations that have been closed by CDFA and is the information CDFA is allowed to present under public records laws. Lee informed the Committee that when any case referred to CDPH or the NOP, CDFA closes their own investigation unless working with the CDPH or NOP to assist. Johnson and Lee discussed the use of Letters of Information to retailers to inform them that they may be selling items as organic that are not certified. Lee reiterated that the purpose of these letters is to educate retailers and allows SOP to track whether a retailer has been informed of a possible violation.

Kaley Grimland asked Lee whether the complaints came from consumers or from competitors. Lee and Renteria stated that complaints come from both consumers and competitors.

Chair Archipley asked Renteria and Lee to elaborate on investigations conducted at farmers' markets. Carlsen shared with the Committee that agricultural commissioners assist CDFA with inspections at certified farmers' markets throughout the state. Carlsen stressed that there are regulatory guidelines and a penalty matrix for such purposes, and that certificates for sellers at certified farmers' markets can be suspended if necessary.

Alexis Randolph asked if CDFA could provide insight into the internal processes involved in deciding how investigative activities are conducted. Randolph stated it would assist the Committee in understanding how the decisions by CDFA are made.

vi. Revenue from Registration/New Registrations

Mayze Fowler-Riggs presented information on Revenue from Registration and New Registrations to the Committee. Fowler-Riggs stated that to date in the 2019-20 FY, \$571,058 in registration fees had been collected by the SOP. The total for the 2018-19 FY was \$1,574,494. Fowler-Riggs also provided details on whether the registrants were producers, handlers, or processors with a breakdown by month. Fowler-Riggs stated that SOP would present the total registrants for the 2019 calendar year at the next COPAC meeting but did state that so far there has been an increase in total registrants.

Johnson asked Fowler-Riggs if registrants are counted more than once given that they can be registered as more than one type of operator. Fowler-Riggs explained that although they can be registered as more than one type of operation, each registrant is counted only once.

Randolph asked Fowler-Riggs if there was data available on how many registrants were leaving each year to compare with the new registrants. Fowler-Riggs noted that this data is not currently available but can be provided.



vii. SOP Fund Condition

Lee provided the SOP Fund Condition. Lee noted that spending has been trending down in recent years, but also stated that there are ways that can be examined for increasing spending. Johnson asked Lee what would be needed to spend down excess revenues, the Committee could make suggestions that could then be reviewed by SOP for feasibility. The Committee could provide SOP with a set of ideas for spending which would then allow SOP to investigate what they can and cannot pursue.

Bowen asked about the possibility of conducting surveys of organic stakeholders to identify their preferences and recommendations for SOP efforts. Carlsen informed the Committee that COPAC has provided a list of recommendations to the CDFA Secretary in the past. Carlsen recommended that the Committee revisit the information from the Assembly Bill 1826 (Statutes of 2016) working report. Lee stated that this report is available via the COPAC website.

viii. Pesticide Residue Report/Updates

Renteria presented the Pesticide Residue Report and provided data on pesticide residues detected during SOP's surveillance and investigative activities. Renteria stated that though detections are counted individually, that does not mean that each detection came from a different source, there are cases where multiple samples are taken at one location. Renteria gave details on data collection and how different kinds of surveillance are prioritized based on data gathered.

**ITEM 7: MRO APPROVAL OF NOVEL LIQUID AMMONIA PRODUCTS**

Mike Menes presented slides and provided information regarding the approval of novel liquid ammonia products by Material Review Organizations (MRO) in the organic industry. Menes requested that CDFA prudently suspend accepting registration applications and approval of ammonia fertilizers as organic input materials until the National Organic Standards Board (NOSB) has resolved whether the use of ammonia fertilizers produced by an existing or any novel method is compliant with the Organic Foods Production Act of 1990.

Menes explained that novel liquid ammonia products are a new category of input that is a liquid ranging from two percent ammoniacal nitrogen to seven percent ammoniacal nitrogen. Menes further stated that these products are from biological sources, purified and separated from other materials, and concentrated.

Menes voiced concern about perceived conflict between what CDFA and the Organic Materials Review Institute (OMRI) were publishing regarding novel liquid ammonia products. According to Menes, CDFA is currently approving the use of novel liquid ammonia products while OMRI is delaying approval of some until NOSB determines their status.

Menes suggested that CDFA halt approval of novel liquid ammonia products until NOSB has made a final determination regarding their compliance with the Organic Foods Production Act of 1990 to avoid the potential for farmers who have been using them to no longer be organic if NOSB determines novel liquid ammonia products are not organic inputs. Menes further expressed concerns regarding the potential negative impact of novel liquid ammonia products on the organic industry as a whole.

Discussion ensued in which Bowen expressed concern that if CDFA continues approval of novel liquid ammonia products, a liability has been created for farmers that use them if the NOSB determines that these products are not approved for use in organics.

Randolph, who is a member of the OMRI board of directors, clarified that OMRI is only considering novel liquid ammonia products as beyond resolution if they are made using anaerobic production methods. Randolph clarified that both CDFA and OMRI are in alignment on approving some ammonia products and reiterated that the only ammonia products that OMRI considers beyond resolution are those made using anaerobic production methods.

There was further discussion regarding how organic certifiers could be affected. Randolph suggested sending a letter from COPAC to the Secretary to ask NOSB to review novel liquid ammonia products and resolve discrepancies between MROs.

Chair Archipley asked Randolph and Menes to clarify the request for a letter to the Secretary. Further discussion between Menes, Randolph, LaRocca, and Johnson occurred to clarify the intent of a letter to the Secretary. Chair Archipley asked if the Committee would prefer to address this topic at a future meeting or to continue ahead with a letter to the Secretary.

Randolph again stated that there are currently non-synthetic novel liquid ammonia products that are being approved by both OMRI and CDFA. Randolph noted that if CDFA were to stop approving these materials there would be a separation between what CDFA and OMRI are approving. Randolph stated that there is currently no separation between CDFA and OMRI.

**MOTION:** Alexis Randolph moved that COPAC requests the Secretary send a letter to the NOP expressing concern regarding non-synthetic ammonia fertilizers and asking for NOSB review of these ammonia products created by novel production methods to resolve any discrepancies between MROs. Mike Menes seconded the motion.

A member of the public voiced concern that COPAC does not have the information necessary to make a motion regarding novel ammonia fertilizers. Chair Archipley asked the Committee if it would prefer returning to this motion at a future meeting. Discussion ensued during which the Committee expressed that this motion to request a letter from the Secretary is appropriate.

Johnson suggested an amendment to the motion. The amendment was that COPAC make a recommendation to the Secretary to contact the NOP to raise awareness of the

various ammonia products and to bring that to the NOSB to resolve any discrepancies between MROs. Randolph accepted this amendment.

**MOTION:** COPAC requests that the Secretary contact the NOP to raise awareness of the various ammonia products and bring this to the attention of the NOSB to resolve any discrepancies between MROs.

A vote by roll call was taken. Kaley Grimland, Philip LaRocca, Karen Archipley, Ben Diesl, Blake Alexandre, Rosalie Burkett, Jeremy Johnson, Jaclyn Bowen, Michael Menes, and Alexis Randolph voted in favor of the motion. The motion passed unanimously with no abstentions.

### **ITEM 8: ORGANIC POULTRY PRODUCERS – PROCESSING NEEDS**

Grimland provided an update on the lack of United States Department of Agriculture poultry processing facilities in California that are certified organic. Grimland requested that the SOP conduct a survey of organic poultry producers to gather information on their needs and whether members of the industry would be interested in collaborating to meet the needs of organic poultry producers.

Lee stated that SOP will bring more information about conducting a survey to the Committee during the May meeting.

### **ITEM 9: CALIFORNIA ASSEMBLY BILL 5 – WORKER STATUS: EMPLOYEES AND INDEPENDENT CONTRACTORS**

LaRocca provided an update on the impacts of California Assembly Bill 5 (Statutes of 2019). LaRocca stated that the bill has caused problems in the organic industry, including for California Certified Organic Farmers (CCOF). LaRocca expressed that this bill is a burden on small business and small farmers. Chair Archipley stated similar concerns, including that small farms may begin to close as a result of the new regulations.

### **ITEM 10: NATIONAL ORGANIC PROGRAM COMPLIANCE AND ENFORCEMENT**

#### i. NOP Compliance and Enforcement Rule

Randolph provided the Committee with information on the NOP Compliance and Enforcement Rule. Randolph noted that this rule still has not been published and is currently in the Office of Management and Budget.

#### ii. NOP Instruction 2040

Randolph stated that NOP will allow hemp producers to become certified organic under the 2018 Farm Bill. Randolph asked if SOP could give an update on whether organic hemp farmers are being registered with CDFA. Lee stated that SOP is registering organic hemp farmers but stressed that both hemp and organic requirements must be met by those wishing to register organic industrial hemp.

Carlsen noted that county agricultural staff who will be conducting inspections on hemp must work to maintain compliance with both state and federal guidelines for hemp. Johnson asked if it would be possible for the Committee to recommend that the state speed up the process of updating their hemp regulations to match those at the federal level.

**MOTION:** Jeremy Johnson moved that COPAC write a letter encouraging the Secretary to have CDFA promulgate hemp rules and compliance with the 2018 Farm Bill as soon as possible. Alexis Randolph seconded the motion. The motion passed, with Blake Alexandre opposed and Jaclyn Bowen abstaining.

### **ITEM 11: PUBLIC COMMENTS**

A member of the public commented that the vote on novel ammonia products after the presentation by Menes was based on incomplete information.

Jane Sooby of CCOF expressed thanks to CDFA staff and the members of COPAC. Sooby also asked that SOP write a press release regarding new appointments to COPAC as well as publish the current vacancies on the Committee to encourage public interest in COPAC. Sooby gave thanks to CDPH for enforcement of the organic processed products and asked if CDPH would be able to provide information on the value of the organic industry in California as had been done in previous years. Sooby also asked whether California law will have to be modified to match new federal regulations for organic enforcement.

Deborah Stemwedel of California Organic Fertilizers commented voicing concern about the human consequences of natural liquid ammonia products in Southeast Asia. Stemwedel claimed that these products have a negative human rights impact in the Bay of Bengal in particular. Stemwedel distributed information to those present on these concerns. Stemwedel recommended that the organic industry immediately limit the amount of nitrogen in manure fertilizers to the levels recommended by the University of California. Stemwedel asked that these issues be brought before the Secretary.

Charlene Graham of the CDFA Organic Cannabis program announced that they have announced a request for proposal for an information consultant position and asked that those present share the information.

There were no other public comments.

### **ITEM 12: NEXT MEETING/AGENDA ITEMS**

King informed the Committee that CDFA will be sending a poll to them asking what date in May the Committee would like to have its next meeting.

### **ITEM 13: ADJOURNMENT**

The meeting was adjourned at 3:13 p.m. by Chair Archipley.

Respectfully submitted by:

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Danny Lee, Supervising Special Investigator  
State Organic Program



**CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE (CDFA)  
CALIFORNIA ORGANIC PRODUCTS ADVISORY COMMITTEE (COPAC)**

**May 7, 2020  
Meeting Minutes  
Teleconference**

**MEMBERS PRESENT**

Karen Archipley – Chair  
Phillip LaRocca – Vice Chair  
Benjamin Diesl  
Jeremy Johnson  
Jamie Nessel  
Jaclyn Bowen  
Mike Menes  
Kaley Grimland  
John McKeon  
Alexis Randolph  
Wendy Reynolds  
Stacey Carlsen

**MEMBERS ABSENT**

Sean Feder  
Blake Alexander  
Rosalie Burkett

**INTERESTED PARTIES**

Jane Sooby, CCOF

**CDFA**

Marcee Yount  
Mitchell King  
Scott Renteria  
Mayze Fowler-Riggs  
Danny Lee  
Pam Rodriguez  
Andrea Cano  
Steve Patton

**ITEM 1: CALL TO ORDER-INTRODUCTIONS/ROLL CALL**

The meeting was called to order at 10:04 a.m. by Karen Archipley, Chair. Self-introductions were made, roll was called by Mitchell King and a quorum was established.

**ITEM 2: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH UPDATES**

i. Enforcement and Registration Activities

Wendy Reynolds provided the California Department of Public Health (CDPH) updates. Reynolds provided the Committee with an overview of complaints that CDPH has received that remain open; briefly covering the data on complaints for the fiscal years (FY) 2018/2019 and 2019/2020. For the FY 2018/2019, CDPH received 29 complaints, 19 of these complaints are now closed with another 10 in process. For the FY 2019/2020, CDPH has received 18 complaints, with six closed and 12 in process. Reynolds clarified that complaints listed as in process are awaiting further information, investigation, or submittal of a final report. Reynolds also presented information on inspections conducted and revenue collected by CDPH in both FYs 2018/2019 and 2019/2020.

There was a period of discussion between members of the Committee and Reynolds regarding steps CDPH has taken to continue working and conducting inspections during the COVID-19 pandemic.

### **ITEM 3: STATE ORGANIC PROGRAM UPDATES**

#### i. Vacancies and Terms Report

King provided the Vacancies and Terms report. Current vacancies include: one producer representative; one technical representative; one consumer representative; one wholesale distributor representative; five producer alternates; one wholesale distributor alternate; two processor alternates; one consumer representative alternate; one environmental representative alternate; two technical representative alternates; and one retail representative alternate. King also provided the names of members who will be eligible for reappointment as of October 31, 2020.

#### ii. Compliance and Enforcement Summary

Scott Renteria presented the Compliance and Enforcement Summary for the period of July 1, 2019 through March 31, 2020. Renteria noted that the numbers presented were not entirely up to date due to the restraints and limited enforcement activities caused by the COVID-19 pandemic. Renteria added that updated numbers will be presented at the next COPAC meeting. As of March 2020, the State Organic Program (SOP) received 76 complaints and conducted 910 inspections, with the majority conducted at Certified Farmers' Markets. A total of 158 samples were collected, with 147 surveillance samples and 11 investigative samples. Of these 147 surveillance samples, 12 detected residues below tolerance levels, and five detected residues above tolerance levels. There were also 11 investigative samples, of which seven detected residues below tolerance levels and zero detected residues above tolerance levels. A total of five appeals were received, with one active and four closed.

#### iii. Complaint Activity Report

Renteria provided the Complaint Activity Report. As of March 2020, the State Organic Program (SOP) received 76 complaints in total. Of these complaints: 42 were investigated by CDFA and County Agricultural Commissioner staff; 13 were referred to Accredited Certifying Agents; 15 were referred to CDPH; four were referred to the National Organic Program (NOP); and two were referred to the Organic Input Materials Program.

There was brief discussion between Renteria, Chair Archipley, and Reynolds on how SOP and CDPH handle complaints that have been referred from SOP to CDPH. Chair Archipley asked that CDPH provide a report on how many of their complaints originate from SOP at the next meeting.

#### iv. Pesticide Sampling Report

Renteria provided the Pesticide Sampling report as of March 2020, detailing the results of samples collected by SOP during routine and investigative efforts.

v. New Registrations

Mayze Fowler-Riggs presented information on New Registrations. Fowler-Riggs noted that for the 2019 calendar year there were 4,304 total registrants, continuing the upward trend seen in previous years.

Jeremy Johnson asked Fowler-Riggs if SOP has noticed a drop in registrations due to the COVID-19 pandemic. Fowler-Riggs stated that there has not been a noticeable drop in applications for organic registration. Johnson asked that Fowler-Riggs provide an update on any trends at the next COPAC meeting.

vi. Revenue from Registration

Fowler-Riggs provided information on Revenue from Registration as of March 2020 to the Committee.

**ITEM 4: FY 2020/2021 PROPOSED BUDGET REVIEW**

Danny Lee presented the FY 2020/2021 Proposed Budget. The total proposed SOP budget is \$2,225,894, with a projected revenue of \$1,715,581. The total personnel services expenses are \$875,570; total operating expenses and equipment costs are \$967,155; and total departmental expenses are \$343,347.

There was discussion between Lee and Johnson regarding underspending in previous years. Lee stated that this is a result of counties not using the entirety of their funds allotted in the SOP budget for enforcement activities. Lee said that counties are becoming more active and have increased their inspection and sampling activities, thus increasing the spending of their available funds.

**MOTION:** Jeremy Johnson moved to approve the FY 2020/2021 Proposed Budget as submitted. Jaclyn Bowen seconded the motion. A vote by roll call was taken, with Kaley Grimland, Karen Archipley, Benjamin Diesl, Jeremy Johnson, Jaclyn Bowen, Michael Menes, and Alexis Randolph in favor. The motion passed with Phillip LaRocca and Jamie Nessel abstaining.

**ITEM 5: PUBLIC COMMENTS**

Chair Archipley opened the floor to public comments.

Jane Sooby with California Certified Organic Farmers (CCOF) asked of the need for the January 23, 2020 Meeting Minutes to be reviewed by CDFA's legal department. Lee explained that this review was to ensure that the motions made during that meeting were in compliance with the Bagley-Keene Open Meeting Act and would be presented to the Committee after this review is completed.

Sooby then asked Fowler-Riggs if the data provided on registrations included data from CDPH. Fowler-Riggs stated that the registration data presented only included organizations registered with CDFA. Fowler-Riggs then explained which types of organizations would be required to register with CDFA and which would register with CDPH.



Michael Menes asked Lee when SOP would be able to provide a timeline for receipt of the January 23, 2020 Meeting Minutes. Steve Patton explained that the process will move forward as quickly as possible through the necessary reviews.

**ITEM 6: NEXT MEETING/AGENDA ITEMS**

The next meeting will take place at the CDFA Gateway Oaks Office in September 2020; provided in person meetings are allowed and proper COVID-19 safety precautions can be followed. If the September meeting cannot take place in person, a video conference option, such as Zoom, will be considered. King will be sending a Doodle poll to Committee members to select a date.

Johnson asked that CDPH provide the updates on the Food Safety Fund at the next meeting. Johnson also asked that both CDPH and CDFA provide information on the impact of COVID-19 on new registrations and renewals. Johnson also encouraged both CDPH and CDFA to evaluate video conferencing options.

Kaley Grimland asked that there be an update on organic processing and slaughtering from SOP. Grimland also asked if CDFA could provide an update on the efforts of Thea Rittenhouse as they relate to the SOP. Grimland also asked that there be a discussion of changes made to the Cost Share Program. Renteria and Grimland briefly discussed changes that have been made to processes and procedures in the Cost Share Program.

**ITEM 7: ADJOURNMENT**

The meeting was adjourned at 11:21 a.m. by Chair Archipley.

Respectfully submitted by:

---

Danny Lee, Supervising Special Investigator  
State Organic Program



Ryan, Swanson & Cleveland, PLLC  
1201 Third Avenue, Suite 3400  
Seattle, WA 98101-3034  
206.464.4224 | Fax: 206.583.0359  
Toll-free: 1.800.458.5973

[www.ryanswansonlaw.com](http://www.ryanswansonlaw.com)

direct dial 206.654.2236  
direct fax 206.652.2936  
roberts@ryanlaw.com  
Ref. No. 2149964.01/016232.00001

Philip M. Roberts  
*Licensed in Washington and Connecticut*

July 20, 2020

COPAC Members

**RE: Perfect Blend LLC – True Organics Petition**

Dear COPAC Members:

We represent Perfect Blend LLC (dba Perfect Blend Organics) (“Perfect Blend”). It came to our attention last on Friday, July 10, 2020, that Mr. Michael Menes, VP – Food Safety and Technology at True Organic Products Inc. (“True”), submitted a petition to the National List Manager of the National Organic Program (“NOP”) requesting “Novel Ammonia Products” be added to the Prohibited Substances under Section 602.

Perfect Blend is the manufacturer of the Organic NH<sub>4</sub> ammoniacal product listed on Page 37 of the petition. The technology associated with the manufacturing process was developed by Perfect Blend and BioStar Organics (“BioStar”). Perfect Blend itself has manufactured registered organic fertilizer products since 2001 and certified organic growers have depended on Perfect Blend for quality products over these past 19 years. During that time Perfect Blend has developed numerous innovative products for that marketplace and has been in the forefront in promoting the concept of soil health while working with Hall of Fame USDA Laboratory Director Dr. Jerry Hatfield.

We are disappointed that neither BioStar nor Perfect Blend were contacted prior to the submitted petition and especially prior to your vote on January 23, 2020 (attached). Please send us a copy of the COPAC minutes approving the resolution. It is particularly disturbing because it appears that True is using its position on various committees, and possibly boards as well, to try to undermine competition by erroneously describing the novel ammonia products of Perfect Blend/BioStar. The production process described in the petition is inaccurate and concerns over marketplace controls are misplaced. As an example, see the attached analytical report from Aquatech Enviroscience Laboratories Inc. showing that the BioStar/Perfect Blend Organic NH<sub>15</sub> ammoniacal product provides organic governing institutions, certifiers and growers with the highest level of confidence for organics.

This disingenuous attempt by True to squelch competition is even more shameless when put in context. We suspect that you are not aware that from 2012 through 2017 True had a five-year exclusive marketing agreement with BioStar for the novel ammonia products. During that time period, BioStar was unable to produce that product on a commercial scale and therefore no product was delivered to True. Only now that the True marketing agreement has terminated, while

BioStar is completing a plant in California for this product with exclusive marketing rights assigned to Perfect Blend, do True and its representatives claim that the product is not organic. True found substantially same product acceptable when they had an exclusive marketing arrangement, but now that the contract has ended, they have self-servingly petitioned NOP to remove it from competition.

We are in the process of having a more detailed response prepared addressing the issues in True's petition. Since we just heard about that petition several days ago we wanted to immediately reply since the petition was apparently filed many months ago without Perfect Blend's or BioStar's knowledge. Here are our some of our objections regarding the True petition:

- a. True incorrectly compares the manufacturing process of the novel ammonia products to that of non-synthetic manufacturing. That is incorrect. They are not the same. True does not know or understand our process, apparently relying on uninformed third parties or guesswork.
- b. Clear CDFA guidance protocols were provided to and followed by Perfect Blend prior to completing the product registration with that Agency. In addition, the Perfect Blend/BioStar technology/product has been registered with OMRI since 2012 by BioStar. True should be less concerned about fraud and more concerned with its own efforts to disingenuously use its position on the COPAC board to manipulate the board into supporting its patently erroneous petition.
- c. Prior to registering the novel ammonia product CDFA requested guidance from the NOP and that guidance was provided by Mr. Paul Lewis (Director of the Standards Division – NOP/USDA) in a letter dated October 11, 2018. OMRI also received a copy of that letter. As part of the registration a senior environmental scientist from the CDFA, Mr. Martin Burger, PhD, visited the manufacturing facility for the novel ammonia product to understand the manufacturing process in its entirety and he supports the CDFA registration.
- d. Our unique process follows all NOP manufacturing guidelines for organic liquid fertilizer production. Furthermore, the method of production, and the product itself, are not harmful to the soil and do support the NOP's integrity of organic principles. Throughout the registration and compliance process, both the CDFA audit team and OMRI inspected the production facility, undertook testing on numerous occasions, including unannounced inspections, and verified the product is manufactured within the rules of the NOP. Careful consideration was given by OMRI and the CDFA concerning the possibility of cheating or fraud, as well as verification that the principles of organic farming, as outlined by the NOP, were satisfied. True's claims that the Perfect Blend/BioStar novel ammonia product does not satisfy the seven criteria established by the NOSB to evaluate whether a substance should be allowed or prohibited in organic production is wrong. The product does satisfy those criteria. Both OMRI and the CDFA are satisfied that the criteria was met.

- e. It has been established through a simple and cost-effective isotope test (at the Aquatech Enviroscience Laboratories Inc. - Attached) that the product has been verified as organic, rendering baseless True's stated concerns regarding potential fraud. The CDFA received its independent test from the UC Davis Isotope lab. The cost for such a test is \$11.00 per sample.

BioStar is bringing online a \$50 million green-energy and liquid fertilizer manufacturing facility located in San Bernardino, CA. Results from current crop trials and other feedback from growers indicates that BioStar/Perfect Blend liquid fertilizers will strongly challenge the present market position of True's liquid fertilizer products. The Perfect Blend/BioStar product meets all of the NOP guidelines as shown above.

COPAC has to date relied solely upon meritless claims and declarations provided by True, a competitor of Perfect Blend. We do not understand why COPAC did not contact Perfect Blend and BioStar for information concerning True's claims. In the near future we will address each item presented in True's petition to the NOSB in a separate, detailed response. In the meantime, we respectfully request a response from COPAC to this letter.

We look forward to receiving your response at your earliest convenience.

Very truly yours,



Philip M. Roberts

PMR:aah

cc: NOSB – Devin Patillo  
California Secretary of Agriculture – Secretary Karen Ross  
CDFA – Dale Woods  
COPAC Members



True Organic Products, Inc.  
PO Box 7192  
Spreckels, CA 93962  
(831) 375-4796 | [www.true.ag](http://www.true.ag)

August 7, 2020

COPAC  
C/O California Department of Food and Agriculture  
2800 Gateway Oaks Drive, Suite 100  
Sacramento, CA 95833

Dear Members of COPAC,

Thank you for your contribution to the integrity of Organic agriculture in California. True Organic Products shares this passion of Organic Integrity and the framework that is built to support it.

COPAC has unanimously voted to encourage the review process of the National Organic Standards Board for a determination on Ammonia Extract (aka Novel Ammonia Fertilizers). I applaud COPAC for seeing the need for an expedited review of a new, novel technology that may harm the integrity of Organic. True's intent is to protect the Organic Seal and Organic Agriculture in California, which is in alignment with California's State Organic Program and COPAC.

It has been brought to my attention that the COPAC members have received a letter regarding Ammonia Extract from a lawyer at Ryan, Swanson & Cleveland, PLLC. I refute its allegations and assure you that its content is not accurate.

This is a pivotal moment in Organic history where COPAC can continue to influence the future development of Organic Agriculture in California. Thank you for your actions to improve Organic Integrity and the support for the programs established to protect the Organic Seal.

Sincerely,

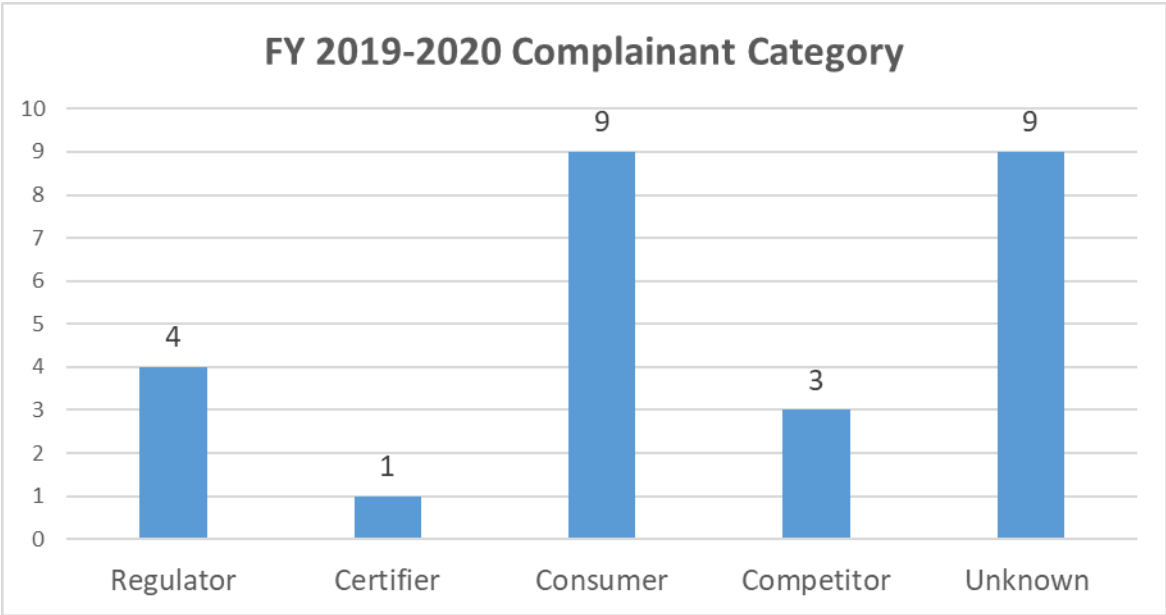
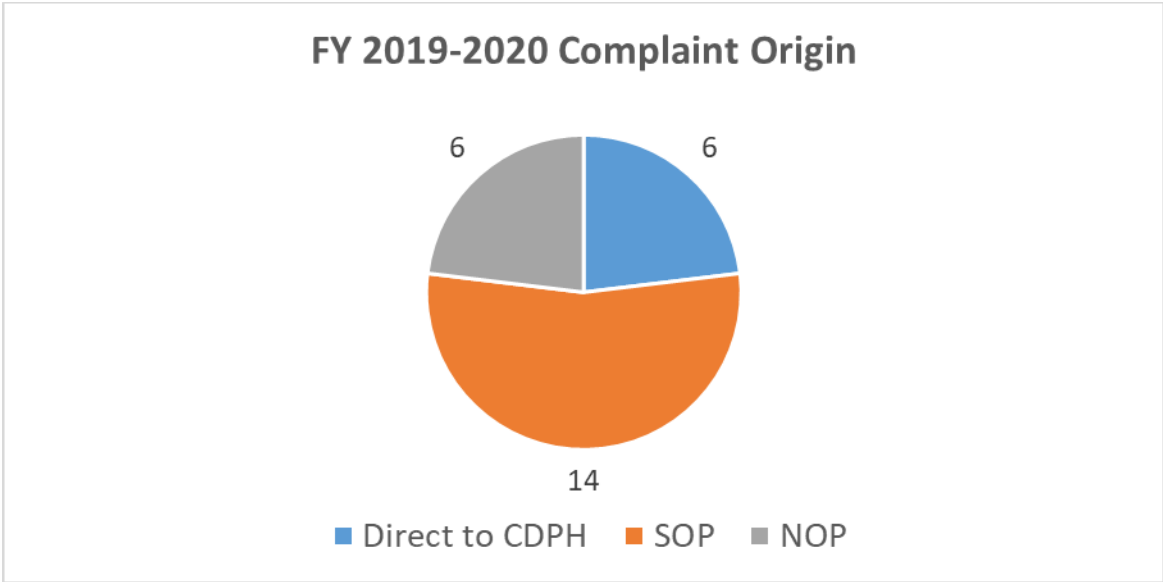
A handwritten signature in black ink, appearing to read "Jake Evans", written over a faint horizontal line.

Jake Evans

President and CEO  
True Organic Products, Inc.

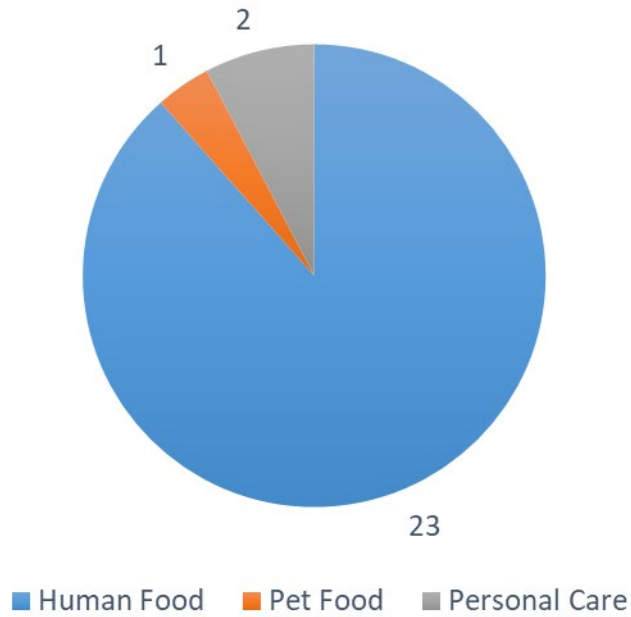
California Department of Public Health- Food and Drug Branch  
Organic Processed Products Program  
Complaint Summary – September 2020

Fiscal Year 2019-2020 Complaint Summary

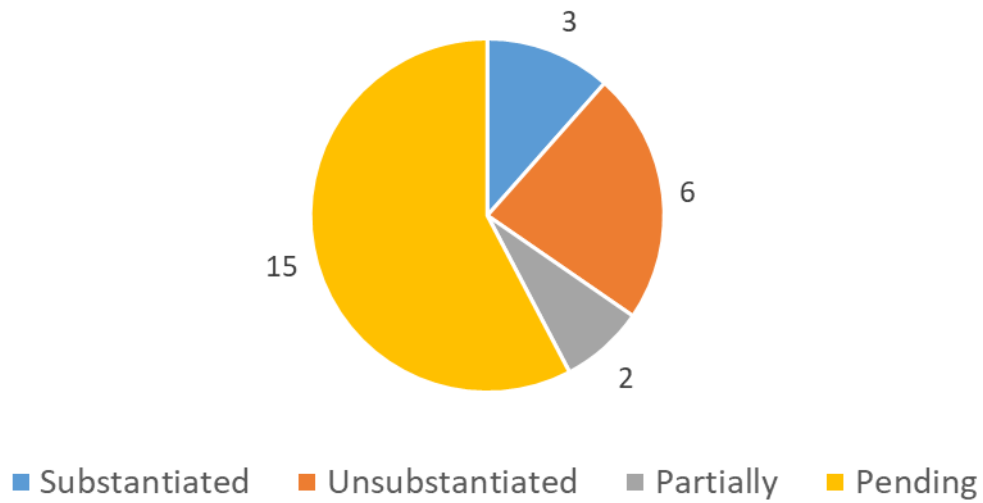


California Department of Public Health- Food and Drug Branch  
Organic Processed Products Program  
Complaint Summary – September 2020

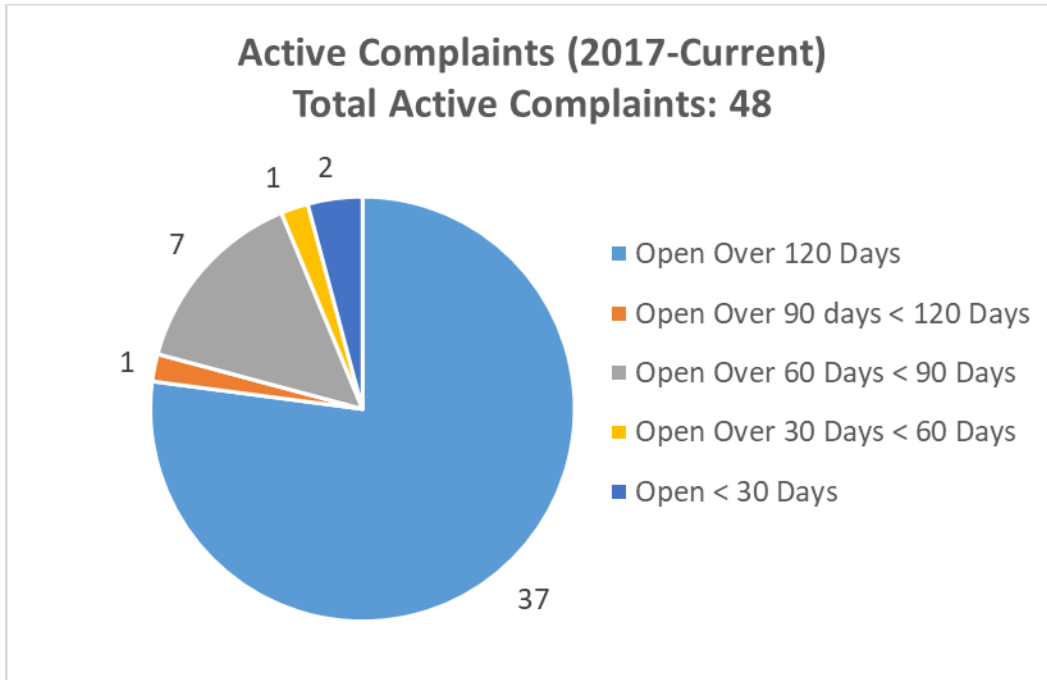
**FY 2019-2020 Product Complaint Category**



**FY 2019-2020 Complaint Outcome**



## Active Complaint Summary



### Reasons for Active Complaints

Investigation pending or in-process

Waiting for information from the firm

Investigation complete and report is pending

Report review pending

Most Frequently Cited Allegations

Uncertified, Unregistered, Use of USDA Organic Seal, and Misbranding



Food and Drug Branch - Organic Program

Account Number	Expenditure Type	2013-14 Actual Expenditures	2014-15 Actual Expenditures	2015-16 Actual Expenditures	2016-17 Actual Expenditures	2017-18 Actual Expenditures	2018-19 Projected Expenditures	2018-19 Actual Expenditures	2019-20 Projected Expenditures	*2019-20 Projected Expenditures	*2020-21 Projected Expenditures
5100000	Salaries/Wages	\$ 302,333	\$ 279,990	\$ 233,943	\$ 293,865	\$ 198,617	\$ 177,838	\$ 299,657	\$ 235,611	\$ 194,544	\$ 248,705
5170000	Staff Benefits	\$ 166,490	\$ 172,487	\$ 145,613	\$ 191,029	\$ 134,584	\$ 110,188	\$ 161,394	\$ 149,557	\$ 125,575	\$ 136,578
	<b>Total Salaries/Benefits</b>	<b>\$ 468,823</b>	<b>\$ 452,477</b>	<b>\$ 379,555</b>	<b>\$ 484,894</b>	<b>\$ 333,201</b>	<b>\$ 288,026</b>	<b>\$ 461,051</b>	<b>\$ 385,168</b>	<b>\$ 320,119</b>	<b>\$ 385,283</b>
5301400	General Expense	\$ 412	\$ 293	\$ 382	\$ -	\$ 33	\$ -	\$ -	\$ 2,843	\$ 1,852	\$ 1,852
5302100	Printing	\$ -	\$ -	\$ 65	\$ 35	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5304100	Communication	\$ 1,977	\$ 2,297	\$ 2,782	\$ 1,361	\$ 2,043	\$ 790	\$ 785	\$ 1,801	\$ 593	\$ 593
5304400	Postage	\$ -	\$ -	\$ 486	\$ 424	\$ 353	\$ 380	\$ 779	\$ 13	\$ 200	\$ 200
5308700	Vehicle Insurance	\$ -	\$ -	\$ -	\$ -	\$ 1,034	\$ 1,170	\$ 2,340	\$ 963	\$ 372	\$ 372
5320430	Travel: In State	\$ 8,320	\$ 9,702	\$ 8,568	\$ 11,235	\$ 16,731	\$ 12,499	\$ 17,649	\$ 15,749	\$ 10,829	\$ 10,829
5320820	Travel: Out of State	\$ -	\$ -	\$ -	\$ -	\$ (449)	\$ -	\$ -	\$ -	\$ (547)	\$ (547)
5340220	Internal Contracts	\$ -	\$ 225	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,912	\$ 39	\$ 39
5340580	External Contracts	\$ -	\$ -	\$ -	\$ 4,467	\$ 10,000	\$ 10,000	\$ 19,466	\$ 9,980	\$ 10,000	\$ 10,000
5322400	Training	\$ 316	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5301400	Equipment	\$ -	\$ -	\$ -	\$ (128)	\$ (998)	\$ -	\$ -	\$ -	\$ 1,128	\$ 1,128
5390800	Vehicle Operations/Gasoline	\$ 2,893	\$ 3,907	\$ 5,125	\$ 2,527	\$ 2,454	\$ -	\$ 230	\$ 3,046	\$ 46	\$ 46
5390850	Maintenance Repair Svc/Other Vehicle Ops	\$ 1,286	\$ 1,000	\$ 3,099	\$ 1,359	\$ 1,239	\$ 115	\$ 121	\$ 694	\$ 151	\$ 151
5700000	Other Debt Service	\$ -	\$ -	\$ 44	\$ -	\$ 7	\$ -	\$ -	\$ -	\$ -	\$ -
	<b>Total Direct Costs</b>	<b>\$ 15,203</b>	<b>\$ 17,424</b>	<b>\$ 20,549</b>	<b>\$ 21,280</b>	<b>\$ 32,446</b>	<b>\$ 24,954</b>	<b>\$ 41,370</b>	<b>\$ 41,001</b>	<b>\$ 24,664</b>	<b>\$ 24,664</b>
	<b>Total S/W + Direct Costs</b>	<b>\$ 484,026</b>	<b>\$ 469,901</b>	<b>\$ 400,105</b>	<b>\$ 506,174</b>	<b>\$ 365,648</b>	<b>\$ 312,980</b>	<b>\$ 502,421</b>	<b>\$ 426,169</b>	<b>\$ 344,783</b>	<b>\$ 409,947</b>
5324400	Office Svcs	\$ 1,953	\$ 1,945	\$ 2,068	\$ 2,270	\$ 2,169	\$ -	\$ -	\$ 2,327	\$ 2,327	\$ 2,327
5324350	Tech Svcs/FO Rent	\$ 34,921	\$ 23,411	\$ 24,579	\$ 25,525	\$ 17,934	\$ 18,633	\$ 26,475	\$ 29,651	\$ 24,440	\$ 24,440
5342200	EDP Svcs/ITSD Charges	\$ 27,600	\$ 33,681	\$ 35,977	\$ 33,237	\$ 35,144	\$ 63,513	\$ 69,503	\$ 28,370	\$ 29,108	\$ 29,108
5340300	Equipment Pool/Legal	\$ -	\$ -	\$ -	\$ -	\$ 1,225	\$ -	\$ -	\$ -	\$ -	\$ -
5342600	Div	\$ 19,162	\$ 21,891	\$ 18,084	\$ 23,621	\$ 16,916	\$ 32,170	\$ 52,911	\$ 20,128	\$ 20,638	\$ 21,191
5342500	Indirect Dist Cost	\$ 51,460	\$ 49,780	\$ 39,824	\$ 71,215	\$ 45,611	\$ 41,260	\$ (208,995)	\$ 40,828	\$ 33,551	\$ 43,152
	<b>Total Indirect Cost</b>	<b>\$ 135,096</b>	<b>\$ 130,707</b>	<b>\$ 120,532</b>	<b>\$ 155,868</b>	<b>\$ 119,000</b>	<b>\$ 155,576</b>	<b>\$ (60,105)</b>	<b>\$ 121,305</b>	<b>\$ 110,065</b>	<b>\$ 120,218</b>
	<b>Total</b>	<b>\$ 619,123</b>	<b>\$ 600,608</b>	<b>\$ 520,636</b>	<b>\$ 662,043</b>	<b>\$ 484,647</b>	<b>\$ 468,556</b>	<b>\$ 442,315</b>	<b>\$ 547,474</b>	<b>\$ 454,848</b>	<b>\$ 530,165</b>
	<b>Revenue</b>	<b>\$ 799,000</b>	<b>\$ 899,604</b>	<b>\$ 985,498</b>	<b>\$ 1,006,662</b>	<b>\$ 1,080,022</b>	<b>\$ 1,178,578</b>	<b>\$ 1,178,578</b>	<b>\$ 1,136,696*</b>	<b>\$ 1,110,503</b>	<b>\$ 1,114,003*</b>

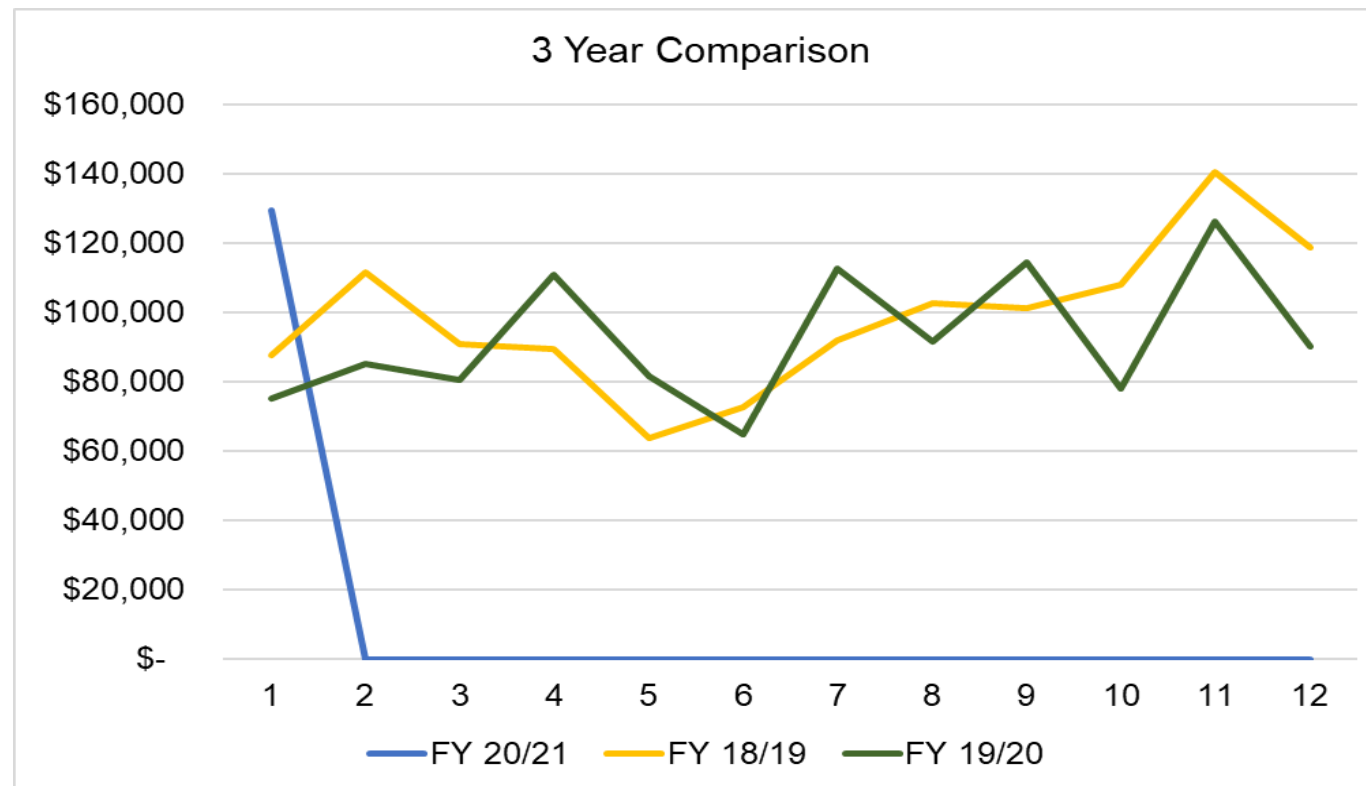
\*Projected Revenue

**Revenue Collections Fiscal Year**

**Program: Organic Food**

<b>Fund #</b>	<b>0177</b>	<b>Program #</b>	<b>26213</b>
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Date	July	August	September	October	November	December	January	February	March	April	May	June	Sum:
FY 16/17	\$ 80,503	\$ 39,998	\$ 55,006	\$ 74,358	\$ 61,094	\$ 115,402	\$ 85,422	\$ 92,975	\$ 77,549	\$ 88,785	\$ 127,743	\$ 86,689	\$ 985,523
FY 17/18	\$ 88,533	\$ 102,912	\$ 79,067	\$ 86,184	\$ 64,221	\$ 64,989	\$ 92,486	\$ 63,676	\$ 107,300	\$ 97,193	\$ 136,595	\$ 97,618	\$ 1,080,773
	10%	157%	44%	16%	5%	-44%	8%	-32%	38%	9%	7%	13%	10%
FY 18/19	\$ 87,720	\$ 111,398	\$ 90,708	\$ 89,498	\$ 63,691	\$ 72,767	\$ 92,009	\$ 102,517	\$ 101,313	\$ 107,963	\$ 140,369	\$ 118,627	\$ 1,178,578
	-1%	8%	15%	4%	-1%	12%	-1%	61%	-6%	11%	3%	22%	9%
FY 19/20	\$ 75,266	\$ 85,150	\$ 80,411	\$ 110,915	\$ 81,651	\$ 64,656	\$ 112,485	\$ 91,414	\$ 114,483	\$ 77,972	\$ 125,998	\$ 90,104	\$ 1,110,503
	-14%	-24%	-11%	24%	28%	-11%	22%	-11%	13%	-28%	-10%	-24%	-6%
FY 20/21	\$ 129,371	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 129,371
	72%	-100%	-100%	-100%	-100%	-100%	-100%	-100%	-100%	-100%	-100%	-100%	-88%



## CALIFORNIA DEPARTMENT OF FOOD & AGRICULTURE STATE ORGANIC PROGRAM

### Compliance & Enforcement/Appeals Summary: FY 2018/2019 & FY 2019/2020



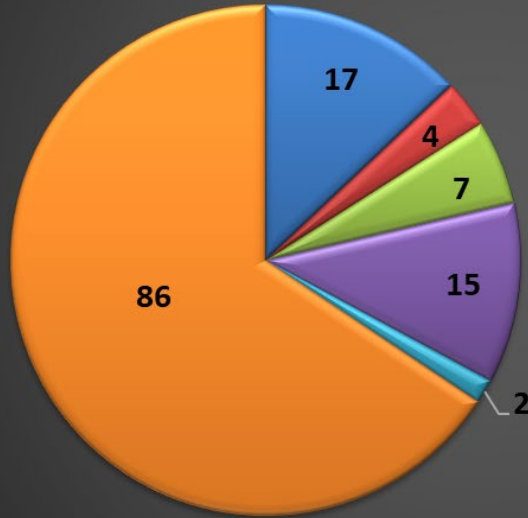
COMPLAINT/INVESTIGATION SUMMARY:	FY 2018/2019	FY 2019/2020
Investigated by SOP (CDFA & County Staff**):	101	80
Referred to Accredited Certifying Agents:	12	23
Referred to California Department of Public Health:	6	22
Referred to National Organic Program:	4	4
Organic Input Materials Program	2	2
<b>Total Complaints Assigned/Referred:</b>	<b>125</b>	<b>131</b>
INSPECTIONS SUMMARY:	FY 2018/2019	FY 2019/2020
Certified Farmer's Market:	1223	974
Production Site:	298	233
Handling Facility:	94	84
Processing Facility:	14	7
Retailer:	71	87
Other:	0	2
<b>Total Inspections:</b>	<b>1700</b>	<b>1387</b>
SAMPLING SUMMARY:	FY 2018/2019	FY 2019/2020
<b>Surveillance Samples (Random):</b>	<b>328</b>	<b>311</b>
Residues Detected Below Tolerance Levels:	28	23
Residues Detected Above Tolerance Levels:	14	11
<b>Investigative Samples:</b>	<b>34</b>	<b>30</b>
Residues Detected Below Tolerance Levels:	13	7
Residues Detected Above Tolerance Levels:	0	2
<b>Total Samples Collected:</b>	<b>362</b>	<b>341</b>
APPEALS SUMMARY:	FY 2018/2019	FY 2019/2020
Appeals Active:	1	1
Appeals Closed:	5	4
<b>Total Appeals Received:</b>	<b>2</b>	<b>5</b>

Notes:

\*\*County staff conduct investigations in coordination with CDFA.

California Department of Food and Agriculture  
 California State Organic Program  
 Complaint Activity Report

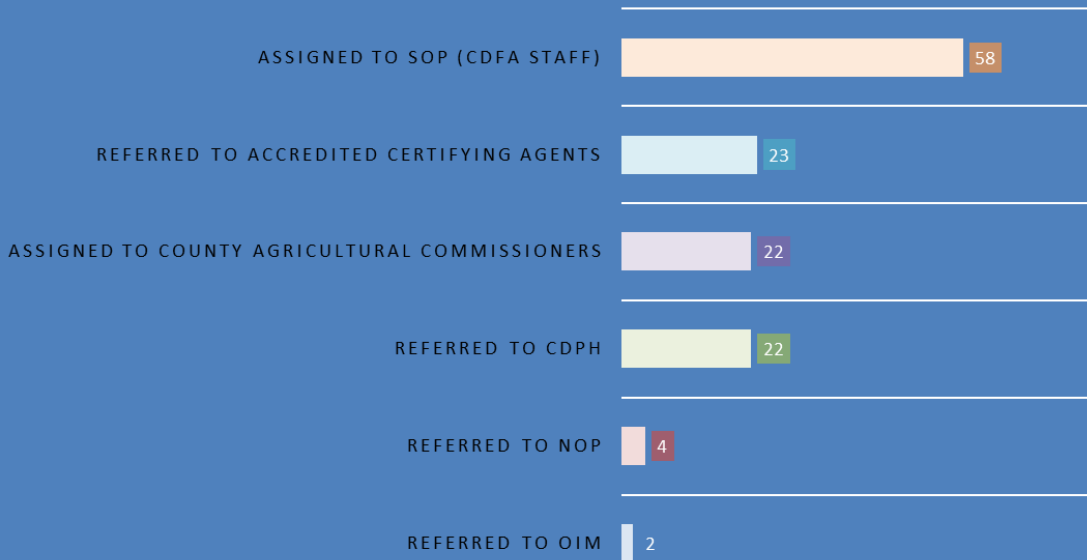
Complaint Activity 7/1/2019 to 6/30/2020



**Total Open Complaints: 45**

- Open Over 120 Days
- Open Over 90 Days < 120 Days
- Open Over 60 Days < 90 Days
- Open Over 30 Days < 60 Days
- Open < 30 Days
- Complaints Closed

Complaint Assignment/Referral Distribution  
 7/1/2019 to 6/30/2020



Total Complaints Assigned/Referred 131  
 \*Includes closed complaints

**General complaint categories from most complaints to least:**

1. Not registered or certified. Product organic status in question.
2. Misbranding/mislabeling containers.
3. Failure to properly identify and/or segregate organic products from non-organic products.
4. Pesticides; excessive or prohibited substances detected.

**STATE ORGANIC PROGRAM COMPLAINT SUMMARY LOG July 2019 - June 2020 (FY 19-20)**



Date Assigned	Date Completed	ID	Company	Complaint/Investigation	Findings	Resolution
5/23/2018	11/19/2019	744-18	Amy's Drive Thru	The complaint alleged that Amy's Drive Thru were making broad organic claims that may be in violation of USDA NOP labeling requirements.	Noncompliance was issued.	Amy's Drive Thru updated their menu, signage, and website to comply with the USDA NOP labeling requirements.
4/23/2019	1/20/2020	865-19	Palma's Produce	The complaint alleged that Palma's Produce represented and marketed their produce as organic without registration with the SOP and certification through an Accredited Certifying Agency.	Notice of Proposed Action to levy \$10,000 in administrative civil penalties was issued.	Palma's produce paid the civil penalties, and has brought their operation into compliance.
5/11/2019	5/19/2020	880-19	Gerwig Avocado Ranch & Pedro Gallardo	CDFA Organic Program staff received positive pesticide results from samples of organic grapefruit collected from Gerwig Avocado Ranch & Pedro Gallardo.	San Diego County conducted a spot inspection and observed commingling issues. San Diego determined that the operation failed to maintain sufficient record keeping. San Diego issued a non-compliance for violating 7CFR 205.103 (b) and 7CFR 205.272(b).	Once the operation addressed issues, San Diego conducted a follow up inspection. The inspector determined that the operation was in compliance. Additional samples were taken for testing, came back with no residues. The SOP closed this case.
7/19/2019	8/7/2019	887-19	Millenia Productions, LLC	The complaint alleged that Millenia Productions, dba La Palm Spa Products were making organic claims, without certification.	Millenia Productions, dba La Palm Spa Products is based out of Wichita, KS.	Referred complaint/investigation to NOP. SOP closed the complaint/investigation.
7/30/2019	12/11/2019	885-19	Oasis Organic	Surveillance samples collected from the production site detected residues of prohibited materials. An investigation was initiated to source the contamination	Contamination was likely due to drift from a neighboring conventional grower.	Operation's OSP updated to reflect the implementation of a more effective buffer area to prevent future contamination.
8/6/2019	10/24/2019	893-19	Upcountry Farms	The complaint alleged that Upcountry Farms were making organic claims on their website without registration with the State Organic Program and certification through a USDA Accredited Certifying Agency.	Notice of Noncompliance and Cease and Desist was issued	On October 4, 2019, Upcountry Farms removed all organic claims made on its website. The SOP closed the complaint/investigation.
8/9/2019	8/9/2019	895-19	Matt's Munchies, Inc.	The complaint alleged that Matt's Munchies, Inc. were making organic claims on their products without certification.	Processed product that falls under the purview of CDPH.	Referred complaint/investigation to CDPH. SOP closed the complaint/investigation.

Date Assigned	Date Completed	ID	Company	Complaint/Investigation	Findings	Resolution
8/9/2019	8/9/2019	897-19	Military Grade Coffee	The complaint alleged that Military Grade Coffee was making organic claims on their products, and utilizing uncertified co-packers in the processing of agricultural products to be sold, labeled, or represented as organic.	Processed product that falls under the purview of CDPH.	Referred complaint/investigation to CDPH. SOP closed the complaint/investigation.
8/9/2019	8/9/2019	899-19	Choc A Brownie Company	The complaint alleged that Choc A Brownie Company were making organic claims on their products, without certification through a USDA Accredited Certifying Agency.	Processed product that falls under the purview of CDPH.	Referred complaint/investigation to CDPH. SOP closed the complaint/investigation.
8/9/2019	8/9/2019	900-19	Baja Precious	The complaint alleged that Baja Precious were marketing and representing their operation and products using the terms "100% Organic" and "Organic", without certification.	Processed product that falls under the purview of CDPH.	Referred complaint/investigation to CDPH. SOP closed the complaint/investigation.
8/6/2019	8/6/2019	892-19	Inner Waymark LLC	The complaint alleged that Inner Waymark LLC were marketing their products as organic without certification through a USDA Accredited Certified Agency.	Processed product that falls under the purview of CDPH.	Referred complaint/investigation to CDPH. SOP closed the complaint/investigation.
8/28/2019	10/21/2019	896-19	DRNK Coffee + Tea	A complaint was submitted stating that USDA logo was posted in windows of store.	Noncompliance was issued.	Company removed USDA logo from window store.
9/4/2019	10/22/2019	906-19	YNT Farming	A complaint was submitted stating that company is selling as "Certified Organic". As of 10/09/2019, company is not registered with SOP and cannot be located in the USDA integrity database.	The SOP conducted surveillance on YNT Farming on a couple farmers markets. Complaint was unsubstantiated.	No violations were found and case was closed
9/4/2019	10/31/2019	917-19	Ogarino YCB Trading	Company is using USDA logo on textile items such as mattresses and pillow covers. As of 10/09/2019, the company cannot be located in the USDA integrity database.	Combined Cease and Desist Order and Notice of Noncompliance issued.	The SOP has reviewed the business content of Ogarino and has determined that it now complies with state and federal regulations.
9/5/2019	10/23/2019	909-19	Central West Produce	The SOP received results from a sample of organic strawberries collected from Walmart (Sample ID 1774) located at 2601 Fashion Place Bakersfield, CA, 93306. Specifically, the analysis detected residues Spinosad. Case was referred to cerifier.	Reviewed documents submitted by cerifier.	Case closed upon reviewing documents, operation followed 205.206, which allows the substance "When the practices provided for in paragraphs (a) through (d) of this section are insufficient to prevent..".

Date Assigned	Date Completed	ID	Company	Complaint/Investigation	Findings	Resolution
9/10/2019	9/10/2019	904-19	All Points Manufacturing	The complaint alleged that All Points Manufacturing was making organic claims on their products without certification through a USDA Accredited Certified Agency.	Processed product that falls under the purview of CDPH.	Referred complaint/investigation to CDPH. SOP closed the complaint/investigation.
9/18/2019	9/18/2019	907-19	HZ Food Inc.	The complaint alleged that HZ Food Inc. were marketing organic milk for sale without certification through a USDA Accredited Certified Agency or an Equivalency Agreement with the USDA NOP.	HZ Food Inc. is based in Canada.	Referred complaint/investigation to NOP. SOP closed the complaint/investigation.
9/23/2019	9/25/2019	908-19	Vasquez Farms 2	The complaint alleged that Vasquez Farms was continuing to sell their products as organic after suspension of their certification.	On September 25, the SOP conducted a CFM spot inspection in Santa Cruz County where Vasquez Farms was selling their products. Complaint unsubstantiated.	On September 25, 2019, Vasquez Farms was not selling their products as organic or making any organic claims. The SOP closed the complaint/investigation.
10/2/2019	4/6/2020	910-10	Maddox Farms	Positive residues for bifenthrin and methoxyfenozide detected on organic olives	Source of contamination could not be determined.	Operation did not renew organic registration, stated no longer wanted to sell organic products.
10/4/2019	10/4/2019	911-19	Hookah Zone USA, LLC, dba Bionic Herbs	The complaint alleged that Hookah Zone USA, LLC, dba Bionic Herbs were representing their product as organic without certification through a USDA Accredited Certified Agency.	Processed product that falls under the purview of CDPH.	Referred complaint/investigation to CDPH. SOP closed the complaint/investigation.
10/4/2019	10/4/2019	912-19	Budsworth Labs, LLC dba Uncle Bud's Industrial Hemp	The complaint alleged that Budsworth Labs, LLC dba Uncle Bud's Industrial Hemp were making organic claims without certification from a USDA Accredited Certifying Agency.	Processed product that falls under the purview of CDPH.	Referred complaint/investigation to CDPH. SOP closed the complaint/investigation.
10/4/2019	10/4/2019	913-19	Maju Superfoods, LLC	The complaint alleged that Maju Superfoods, LLC were making organic claims without certification through a USDA Accredited Certifying Agency.	Processed product that falls under the purview of CDPH.	Referred complaint/investigation to CDPH. SOP closed the complaint/investigation.
10/4/2019	10/4/2019	914-19	Creekwood Naturals	The complaint alleged that Creekwood Naturals were marketing and representing their products as organic without certification with a USDA Accredited Certifying Agency.	Processed product that falls under the purview of CDPH.	Referred complaint/investigation to CDPH. SOP closed the complaint/investigation.
10/4/2019	10/4/2019	915-19	Caer, Inc. dba Yumi	The complaint alleged that Caer, Inc. dba Yumi were making organic claims on their products without the "Certified Organic By" statement on the back of their products.	Processed product that falls under the purview of CDPH.	Referred complaint/investigation to CDPH. SOP closed the complaint/investigation.
Date Assigned	Date Completed	ID	Company	Complaint/Investigation	Findings	Resolution

10/4/2019	10/4/2019	916-19	Canna Living	The complaint alleged that Canna Living were making organic claims without certification through a USDA Accredited Certifying Agency.	Processed product that falls under the purview of CDPH.	Referred complaint/investigation to CDPH. SOP closed the complaint/investigation.
10/16/2019	11/27/2019	919-19	Oliver's Market - Windsor	The complaint alleged that Oliver's Market - Windsor advertised Laguna Farm Sungold Tomatoes as certified organic without Laguna Farm being certified through a USDA Accredited Certifying Agency and registered with the SOP.	A Notice of Noncompliance was issued.	A follow-up inspection conducted by Sonoma County, determined that the violation was corrected by removing the display advertising Laguna Farm Sungold Tomatoes as organic. The SOP closed the complaint/investigation.
10/29/2019	11/5/2019	922-19	Syco San Diego, Inc.	The SOP has received positive residue results from a sample of organic Valencia oranges labeled as organic, collected from Syco San Diego, Inc. at 12180 Kirkham Rd, Poway, CA 92064.	Management confirmed that the oranges were not purchased and intended to be sold as organic	A Notice of Violation was issued to Syco San Diego, Inc. Oranges were also placed on hold until organic claims were removed.
11/8/2019	11/20/2019	924-19	Heritage Farms, LLC	The (SOP)received results from a sample of organic spinach collected from Heritage Farms, LLC at the Elm Canal, Gate 3, Ross Road, California. Specifically, the analysis detected residues Spinosad.	Spinosad is allowed under restrictions. SOP contacted certifier to verify.	After verifying with certifier, the operation used Entrust which contains Spinosad. Operation disclosed everything in their OSP and with their certifier.
11/9/2019	11/21/2019	925-19	Mission Ranches Company, LLC	The (SOP)received results from a sample of organic spinach collected from Heritage Farms, LLC at the Elm Canal, Gate 3, Ross Road, California. Specifically, the analysis detected residues Spinosad.	Spinosad is allowed under restrictions. SOP contacted certifier to verify.	After verifying with certifier, the operation used Entrust which contains Spinosad. Operation disclosed everything in their OSP and with their certifier.
11/12/2019	6/3/2020	926-19	Mike Sudduth Farms Inc.	Positive residues for benulide detected on organic leaf lettuce, above 5% of EPA tolerance	Source of contamination inconclusive	Operation will continue to be monitored. ACA will collect samples and monitor application practices.
11/26/2019	2/4/2020	935-19	Progressive Produce LLC	Positive residues for chlorpropham detected on organic russet potatoes.	Operation did not open original containers that were received from Jones Produce (located in WA).Product not washed or repacked by Progressive Produce. WA and NOP notified of sample results.	ACA verified contamination and commingling prevention measures will be reviewed at annual inspections.
12/5/2019	3/2/2020	929-19	Mattress Outlet LA	Operation displaying USDA seal and making organic claims on bedding and mattresses	NNC issued by county. GOTS certificate provided.	Operation removed all organic claims that were in violation.
1/30/2020	3/12/2020	945-20	P&T Enterprises, LLC	Positive residues for fenprothrin detected on organic lemon foliage.	Tolerance could not be established as sample composite contained foliage. Determined to be overspray - statement from PCA	PCA confirmed more caution will be taken during subsequent conventional sprays.
<b>Date Assigned</b>	<b>Date Completed</b>	<b>ID</b>	<b>Company</b>	<b>Complaint/Investigation</b>	<b>Findings</b>	<b>Resolution</b>



1/30/2020	5/12/2020	944-20	Lantana Farms LLC	Positive residues for pendimethalin found on organic broccoli.	Tolerance could not be established as sample composite contained foliage. Source of contamination determined to be drift.	Operation sent letters to neighbors advising of organic status. Mitigation measures will be reviewed by ACA.
1/31/2020	2/20/2020	948-20	Mud Creek Ranch	Complainant claimed organic fruit they purchased at CFM made them sick	County referred to CDPH. County collected samples of fruit (lemons) at CFM. No residues detected	Referred to CDPH
2/3/2020	5/18/2020	950-20	Coast Produce - Sundance	Positive residues for o-phenyphenol detected on organic navel oranges collected from handling operation, Coast Produce. Oranges sourced from Sundance Natural Foods	Coast Produce not source of contamination commodity already packaged when it arrived at facility and not handled, only stored. Source of contamination undetermined as Sundance Natural Foods does not use any materials that contain o-phenyphenol	Samples will be taken by ACA during next annual inspection
2/4/2020	6/26/2020	943-20	Malek Ranch	A routine inspection was conducted.	During the inspection, the grower could not provide application records of any inputs, used treated lumber for recent installation of their trellises, and could not produce sales records.	Notice of Noncompliance issued - Certifier brought operation into compliance.
2/25/2020	5/4/2020	939-20	O'Hara Grove	San Diego County submitted a complaint against O'Hara Grove for being unresponsive to letters and notice noncompliance.	Operation was being unresponsive to letter that SD mailed. SD County requested CDFA's assistance.	CDFA contacted the operation and explained the consequence of being unresponsive to SD letters. Operation responded and submitted all documents.
3/3/2020	7/13/2020	955-20	Murray Family Farms	As part of routine surveillance sampling, a sample was collected from organic raisins offered for sale by the respondent at the Haggin Oaks CFM.	The analysis detected prohibited materials and an investigation into the source was opened.	CDFA worked in conjunction with operation's certifier to bring operation into compliance. Unannounced inspection verified implementation of corrective measures.
3/9/2020	5/7/2020	958-20	Aulakh Farms Inc.	Samples taken by ACA tested positive for multiple prohibited substances. Product held at facility and excluded from organic sale. ACA issued NNC. NNC not resolved and operation surrendered certification.	Operation surrendered organic registration on 04/03/2020. Letter sent to operation on 04/10/2020 regarding surrender of certification and registration.	Organic registration and certification surrendered, operation notified they cannot represent products as organic.
3/11/2020	6/30/2020	957-20	Lil Patch of Heaven	As part of routine surveillance sampling, a sample was collected from organic butternut squash offered for sale by the respondent at the Little Italy CFM located in San Diego, CA.	The analysis detected prohibited materials and an investigation into the source was opened.	Follow up investigation found no evidence of drift or direct application. Additional samples collected at the growing grounds did not come back with residues. Will continue monitoring.

Date Assigned	Date Completed	ID	Company	Complaint/Investigation	Findings	Resolution
4/4/2020	4/9/2020	960-20	Tang Store	Complaint alleges that Tang Store is selling organic kumquats on Amazon through other organic listings, using amazon's "buy box" feature without registration or certification.	Confirmed Tang Store is selling organic kumquats on Amazon through other organic listings, using amazon's "buy box" feature without registration or certification.	Amazon removed all organic listings by Tang Store and will prevent Tang Store from selling through organic listings in the future.
4/8/2020	5/15/2020	961-20	Moreda Family Farms	Complaint alleges that Moreda Family Farms bottled their milk at a non-certified conventional facility.	Confirmed facility wasn't certified.	Moreda Family Farms obtained registration and is seeking certification.
4/9/2020	4/16/2020	962-20	Tang Store 2	See Complaint ID 960-20.	Following Amazon's actions, a combined NNC & Cease and Desist was issued to Tang Store. This case opened to investigate Tang Store's operations outside of Amazon.	All listings from Tang Store have been removed.
4/20/2020	4/28/2020	966-20	Roy C. Porsche Ranch	Certifier was concern that operation was selling its product as organic after suspension was issued.	An inspection was conducted at Pursche Ranch. Upon reviewing invoices the lima bean have not been sold as organic.	No violations were found and case was closed.
5/5/2020	5/7/2020	969-20	Flowers365	Complaint alleges that Flowers365 is selling organic avocados on Amazon through other organic listings using amazon's "buy box" feature without certification.	CDFA verified that Flowers365 was not certified.	Amazon has removed all of the selling partner's (Flowers365) offers on organic products listed on Amazon.com.
5/5/2020	5/15/2020	970-20	Moreda Dairy	Complaint filed with NOP; possibly same complaint as previously received against Moreda Family Farms.	Complaint against this operation, which was already under investigation under complaint ID 961-20.	Case closed.
5/19/2020	6/15/2020	986-20	Sow a Heart Farm, LLC	Ventura County submitted a complaint against Sow a Heart. The complaint alleged that Sow a Heart required certification.	The CDFA determined that Sow a Heart required certification based on sales of over \$5,000. It was also determined that Sow a Heart was making organic claims without certification.	CDFA issued Sow a Heart a Cease and Desist of all of their organic representation until they obtained certification. On 06/15/2020, the CDFA (SOP) verified that all organic representations were removed and case was closed.
6/10/2020	6/11/2020	978-20	Ashland Hard Seltzers	Ashland Hard Seltzers making organic claims with out being registered with SOP or being certified.	Same complaint was submitted by the same individual in late April 2020, under a different investigation number .	It was explained to complainant that the SOP is currently investigating the original complaint from April and would notify him of the final finding regarding the case.

**NOTE:** This chart lists complaints/investigations that were assigned and closed from July 2019-June 2020

Organic Program Registration Fees Collected by Month and Year

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Fiscal Year	July	August	Sep	Oct	Nov	Dec	Jan	Feb	Mar	April	May	June	Total*	Projected
2019/20	163,301	112,657	123,006	80,563	91,531	128,079	136,271	193,693	105,395	162,431	160,308	160,158	\$ 1,617,393	
2018/19	149,233	129,153	91,297	105,650	105,750	130,474	159,373	107,244	169,934	149,063	159,386	117,937	\$ 1,574,494	
2017/18	114,200	105,924	94,255	105,173	89,192	78,782	193,719	149,559	107,942	155,767	154,598	152,729	\$ 1,501,840	
2016/17	143,058	126,671	109,059	94,381	75,307	137,363	154,791	152,657	147,269	121,660	152,275	141,455	\$ 1,555,946	
2015/16	133,323	114,302	106,030	90,000	74,402	133,525	158,230	145,110	157,078	141,954	144,048	119,999	\$ 1,518,001	
2014/15	116,049	86,750	66,268	105,608	-	191,475	141,069	175,010	145,690	122,753	112,629	122,160	\$ 1,385,460	
2013/14	102,788	108,105	75,674	76,916	83,553	91,069	160,931	147,063	140,183	121,013	116,905	126,179	\$ 1,350,378	
2012/13	101,726	100,237	75,529	91,100	78,629	92,682	157,620	140,554	140,252	111,714	96,450	89,064	\$ 1,275,556	
2011/12	121,663	108,102	75,903	69,493	73,721	87,982	145,999	127,058	91,541	134,586	86,682	98,183	\$ 1,220,914	
2010/11	70,555	82,212	104,311	62,902	66,948	99,831	136,658	91,803	119,711	93,580	102,369	92,386	\$ 1,123,266	
2009/10	72,789	79,513	67,856	63,285	55,128	96,998	120,063	93,642	74,998	90,254	55,807	83,036	\$ 953,368	
2008/09	72,876	73,911	63,563	64,835	71,398	102,695	127,727	94,913	78,774	78,316	83,492	79,279	\$ 991,777	
2007/08	51,985	65,914	61,989	54,560	59,894	91,955	121,776	89,574	71,088	92,462	72,107	83,241	\$ 916,544	
2006/07	46,461	57,168	57,897	47,474	61,087	59,966	103,670	86,253	81,104	76,115	75,212	61,989	\$ 814,397	
2005/06	32,852	39,343	42,662	37,768	47,815	71,678	93,852	72,458	63,557	58,160	43,641	50,775	\$ 654,558	
2004/05	34,576	35,788	28,366	43,254	48,329	77,550	77,306	65,274	54,583	56,563	36,227	47,334	\$ 605,150	
2003/04	33,043	42,659	36,098	34,441	42,785	64,011	57,045	51,563	47,807	46,945	41,934	41,569	\$ 539,900	
2002/03	36,765	29,122	35,448	31,206	30,289	49,412	71,462	62,472	31,798	36,968	34,566	35,508	\$ 485,016	
2001/02	30,143	28,672	19,912	24,087	37,670	44,729	76,118	40,109	36,732	29,573	41,208	24,760	\$ 433,714	
2000/01	27,060	29,889	28,742	21,563	43,640	49,804	63,351	44,783	45,720	26,429	27,672	38,250	\$ 446,905	
1999/00	22,526	23,869	16,693	20,547	34,509	59,557	50,269	30,234	41,024	29,894	45,974	25,110	\$ 400,205	
1998/99	16,525	18,709	14,539	14,809	22,533	35,884	76,993	33,772	26,290	23,267	23,546	32,196	\$ 339,064	
1997/98	13,894	16,251	17,843	16,827	15,180	39,324	65,617	30,022	24,268	19,793	11,592	28,919	\$ 299,530	
1996/97	14,656	11,809	7,628	11,390	13,714	37,654	52,142	22,680	20,561	13,555	11,209	21,007	\$ 238,003	
1995/96	7,001	15,117	8,568	9,152	17,263	33,826	59,630	29,776	17,357	11,750	8,413	6,412	\$ 224,265	
1994/95	13,286	9,643	6,882	7,608	18,913	45,430	49,026	20,402	14,903	7,616	10,067	10,891	\$ 214,667	
1993/94	9,834	9,613	3,979	6,758	12,703	33,361	42,882	22,364	15,471	5,548	9,931	11,577	\$ 184,021	
1992/93	3,174	3,863	2,897	2,859	2,053	14,533	54,253	25,498	11,401	6,775	4,136	12,298	\$ 143,739	
1991/92				938	6,438	11,338	47,478	89,611	23,702	6,300	2,055	5,592	\$ 193,451	

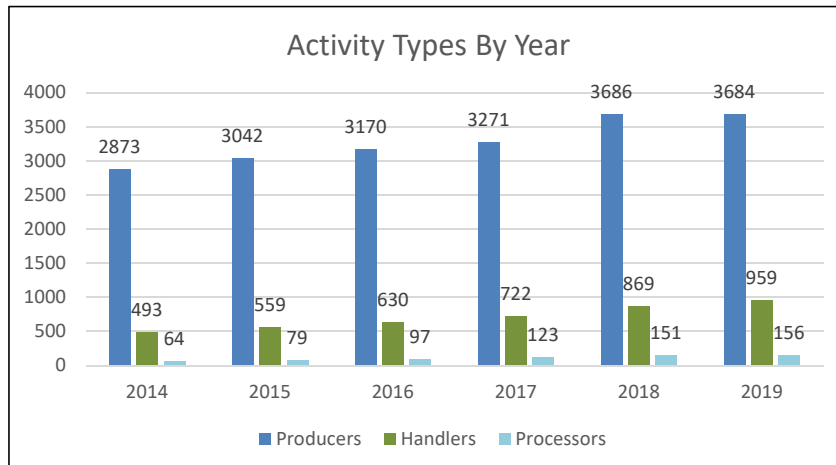
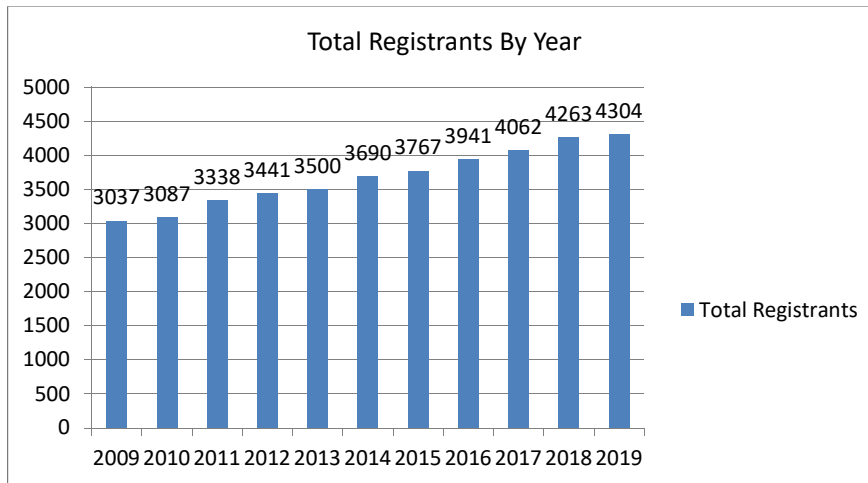
Revenue History Page 1 of 1

\*does not include refunds

CDFA State Organic Program Fiscal Year 2019/20	
Month	Total Number of New Registrations
Jul-19	43
Aug-19	41
Sep-19	33
Oct-19	21
Nov-19	18
Dec-19	7
Jan-20	41
Feb-20	37
Mar-20	46
Apr-20	49
May-20	48
Jun-20	51
<b>Total</b>	<b>435</b>

Operation Types	Producer	Handler	Processor
Month	New Operations By Activity Type		
Jul-19	40	8	1
Aug-19	33	8	1
Sep-19	29	8	0
Oct-19	14	7	0
Nov-19	13	6	0
Dec-19	5	2	0
Jan-20	38	6	2
Feb-20	36	6	0
Mar-20	43	7	0
Apr-20	41	10	3
May-20	42	9	1
Jun-20	42	13	2
<b>Total</b>	<b>376</b>	<b>90</b>	<b>10</b>

**NOTE:** The number of operation types may not match the number of operations, since operations may fall under more than one type.



<b>Organic Program</b>			
2019-2020 Fund Condition as of June 30, 2020			
	<b>2017-2018</b>	<b>2018-2019</b>	<b>2019-2020</b>
Ag Fund Beginning Balance	3,393,313	3,357,945	3,121,692
<b>BEGINNING FUND BALANCE</b>	<b>3,393,313</b>	<b>3,357,945</b>	<b>3,121,692</b>
<b>REVENUE</b>			
Reg/Cert Fees	1,427,081	1,435,457	1,637,869
Delinquent Fees	28,326	25,366	30,234
Organic STDS Violations	21,750	2,475	-
Interest & Other Income	38,760	85,673	49,748
<b>TOTAL REVENUE</b>	<b>1,515,917</b>	<b>1,548,971</b>	<b>1,717,851</b>
<b>AVAILABLE CASH</b>	<b>4,909,230</b>	<b>4,906,916</b>	<b>4,839,543</b>
<b>EXPENDITURES</b>			
PPY Expenditures	(73)	41,727	(33,095)
PY Expenditures	198,420	141,155	27,512
CY Expenditures	1,303,198	1,552,325	1,416,734
<b>TOTAL EXPENDITURES</b>	<b>1,501,544</b>	<b>1,735,207</b>	<b>1,411,151</b>
Cash Adjustments	49,740	50,017	70,738
<b>ENDING BALANCE</b>	<b>3,357,945</b>	<b>3,121,692</b>	<b>3,357,654</b>