

About the Author

Jim Kusler, author of this issue's feature article "When is an Organic Cow not an Organic Cow?" has been an organic grower under the ICS Farm Verified Organic program since 1996. Jim, owner and operator of Brush Creek Organic Farm, was the first producer in the world to use the IFOAM Accredited seal on commercial packaging.

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When is an Organic Cow Not an Organic Cow?

By Jim Kusler

"Play by the rules of the game", is a uniquely transcendent American phrase with a meaning beyond the technical execution of details germane to playing a game. Probably, most of us were introduced to the concept early in life before we heard the phrase or realized its' gravity. Such was my case. At the risk of betraying my age, I may be one of a very few remaining persons who received all eight years of my primary education in a one room country school. All the kids, irrespective of grade and age, took recess at the same time. Our favorite activity was "Kick the Can." What I remember most about the school yard game was the fierceness of the competition.

The scourge of the game was to be the one called "It"! "It" was the person who searched for the kids in hiding and who would jump over the can and loudly yell, "Over the can for Jim," for example, before I or anyone else could kick the can and allow all the discovered kids to return to hiding and commence a new round of play. Only by jumping over the can for all the players could the title of "It" be passed on to another player. To be "It" represented a complete personal meltdown in competitive "Kick the Can"! To be "It" carried a sizable "tease" burden.



The budding competitive instincts within each of us delighted in making sure that whoever was "It" remained "It" for as long as possible. This maximized the opportunity to tease any one person. In spite of our love for the game, over time Kick the Can started to lose its' appeal. The reason was that the person who was "It" was most often a younger, slower student in a lower grade.

We adhered to the rules with great fervor. No one was going to gain an unfair advantage. However, the result

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New Certifications

ICS welcomes the following organizations to our family of certified clients. We're proud to have you with us.

NOP Certifications:

- JMJ Co., Family Farm
- Paul Steury Farm's, Family Farm
- Special "K" Farm, Family Farm
- Willow Creek Farm, Family Farm
- Home Spa Organics, Processor/Mfg.



Calendar

- ◆ March 24, 2007: Medina Ag Days;
Medina, ND (ICS Exhibiting)
- ◆ May 5-8, 2007: All Things Organic;
Chicago, IL (ICS Exhibiting)
- ◆ May 28th: Memorial Day:
ICS Office Closed
- ◆ July 14, 2007: Farm Rescue Golf
Tournament; Jamestown, ND
- ◆ July 28-31, 2007: IFT
Chicago, IL
- ◆ July 4th: Independence Day;
ICS Office Closed
- ◆ September 3, 2007: Labor Day;
ICS Office Closed
- ◆ October 27-29: Expo East;
Baltimore, MD
- ◆ November 11-13: PLMA;
Chicago, IL

April 2007

Sun	Mon	Tue	Wed	Thu	Fri	Sat
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July 2007

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Classifieds

FLAMER FOR SALE

4 row - 3 pt. flamer
250 gal. LP tank
\$ 600 flamer only
\$1100 flamer with tank
Contact Larry McConnell;
Marshalltown, IA.
PHONE: 641-752-8407 or e-mail
kidmcconnell@aol.com

FOR RENT: Organic pasture in northeast Nebraska. For 2007 carrying capacity is app. 150 pairs-would consider dairy animals also from May to Oct 15. Experienced custom grazers.
Call Larry or Monty at
402-584-2337 or e-mail at
tarboxbuffalo@nntc.net for details.

PICKWICK POULTRY PROCESSING EQUIPMENT FOR SALE:

Kill tunnel track, dunker, plucker. Also: stainless steel cooling tanks and tables; vacuum sealers, Sharp freezers and much more; heaters, feeders and waterers also available. Profitable business.

Please call Gary or Carol at 507-964-5815.

To submit an ad for print in the ICS Sustainable Times, please send your classified ad to the editor, Brandi Eissinger, at brandi@ics-intl.com. Final approval is at the option of the editor. Any questions you have on this opportunity, please contact Brandi via the afore mentioned email address, or call 701-486-3578.

Submissions & Feedback

Letters to the editor are welcome. Please include complete contact information including your daytime phone number and signature. All letters are subject to printing in our newsletter, however submission does not guarantee printing. Letters may be edited and cannot be returned.

For information on submitting an article, or if you have any ideas on articles that you'd like to see in our newsletter, please contact Brandi Eissinger at 701-486-3578 or via email at brandi@ics-intl.com. Letters to the editor may be sent to this same address.

ICS welcomes and encourages feedback on our FVO Requirements as well as the other programs we offer. We also encourage comments and suggestions on our newsletter and website. If there is anything else you'd like to see, please let us know and we'll do our best to get you what you need.

When is an Organic Cow Not an Organic Cow? (cont.)

(Continued from page 1)

wasn't very satisfying. There was no pleasure in having a third grader "It" in perpetuity. Our favorite game was no longer fun. Unknowingly, we were discovering a corollary to the phrase "playing by the rules of the game." Rules also embody the "spirit by which the game is played". We were too young to think or talk in those terms. But, we understood the empty feeling.

We missed our favorite past time. Organized discussion wasn't thought about. We were kids just wanting to have fun. Eventually, we drifted, perhaps stumbled, into some school yard rules regarding competitive behavior and the spirit of the game. We made adjustments. Most were minor except for one big change. Just as before, the younger, slower students tended to lose the game. However, that younger student could choose to be "It" or select any other student in any grade to be "It" in his or her place. It changed the dynamics of how the game was played. Instead of ridiculing the students in the lower grades, it was now to the advantage of the kids in upper grades to treat our lower grade school-mates much better for fear that they may select one of us to be "It" in his or her place. And, heaven forbid, we didn't want to shoulder the associated verbal hazing.

A few changes restored our fun with unintended benefits. The most obvious benefit was that we all started treating each other better. Competition was restored, the satisfaction found in treating each other better became an enjoyable habit and we grew a little closer. So, in my small world, the simple game of Kick the Can allowed me to discover that the phrase "Play by the rules of the game"



embraces a bigger notion than just technical proficiency. In our own peculiar way, we discovered that rules also represent the spirit by which the game is played.

This lengthy childhood tale is means by which to introduce an issue within the organic beef industry. Specifically, National Organic Program rules regarding the incorporation and transition of breeding livestock from a "non organic" status

to an "organic" status. Some organic cattle producers may be playing the game according to the letter of the rule; but, at the same time trespassing upon the spirit of the rules of the game. This transgression upon the spirit of the organic livestock production game rules may cause the consuming public to question the integrity of beef products labeled as certified organic. If the consuming public's trust is breached, each organic livestock producer will bare a portion of the loss of confidence cost.

Well, what's the issue? Rule 205.236(3) of the National Organic Program was written to accommodate the transition of breeding livestock from "non organic" to "organic" status. In simple layman's language, the rule says that if a brood cow is pregnant, and, if the offspring of that cow will be raised as an organic offspring, the brood cow must be managed as an organic animal for at least the last third of her gestation period in order for the cow and offspring to qualify as organic. The rule, as written, accomplishes its purpose. That's the good news.

So! What's the problem? Some argue that the rule as written allows an organic producer to move a brood cow from its "organic" status back to a "non organic"

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OMRI Product List

The 2007 OMRI Products List book is available at the OMRI website and hard copies can be requested through ICS. Please contact ICS or visit the OMRI Website: www.omri.org/OMRI_products_list.html.

Organic Transition Hotline Introduced in Midwest

The Midwest Organic and Sustainable Education Service (MOSES) has introduced a new toll-free Farmer Transition Hotline for Midwest producers interested in making the transition to organic production. The number 888-551-4769 (GROW) will be staffed by long-time organic farmer, trainer and organic inspector, Harriet Behar, who says, "I'm a sounding board for people's ideas, and I can show callers that the organic certification process is not as overwhelming as they thought. I'm also here to help farmers understand the organic regulations and get through the paperwork." Visit the MOSES website for more information: <http://www.mosesorganic.org/>.

CC Corner: THE PRINCIPLES AND THE RULES – WHAT WE WANT VS. WHAT WE GOT

We re-print here the full text of the IFOAM Principles of Organic Agriculture. They speak for themselves, an eloquent intention toward a better world for all of us. What is not spoken in them is the painful irony of how far organic certification standards themselves stray from

these principles. Read them, and then consider how little of them is actually embodied in the NOP,

JAS, and EEC

Regulations – or any other national organic regulation being developed or in force today. We at ICS are always striving to bring more of these principles to bear on the rules themselves, but in our current regulatory environment, we admit have a long way to go. We encourage everyone to exceed the rules' expectations and manifest these principles as much as possible. Lead by example. Share in the wealth created by your good will, altruism, and care of the earth!

"Principles of Organic Agriculture

Preamble

These Principles are the roots from which organic agriculture grows and develops. They express the contribution that organic agriculture can make to the world, and a vision to improve all agriculture in a global context.

Agriculture is one of humankind's most basic activities because all people need to nourish themselves daily. History, cul-

ture and community values are embedded in agriculture. The Principles apply to agriculture in the broadest sense, including the way people tend soils, water, plants and animals in order to produce, prepare and distribute food and other goods. They concern the way people

interact with living landscapes, relate to one another and shape the legacy of future generations.

The Principles of Organic Agriculture serve to inspire the organic movement in its full diversity. They guide IFOAM's development of positions, programs and standards. Furthermore, they are presented with a vision of their world-wide adoption.

Organic agriculture is based on:

- The principle of health
- The principle of ecology
- The principle of fairness
- The principle of care

Each principle is articulated through a statement followed by an explanation. The principles are to be used as a whole. They are composed as ethical principles to inspire action.

Principle of health

Organic Agriculture should sustain and enhance the health of soil, plant, animal, human and planet as one and indivisible.

This principle points out that the health

of individuals and communities cannot be separated from the health of ecosystems - healthy soils produce healthy crops that foster the health of animals and people.

Health is the wholeness and integrity of living systems. It is not simply the absence of illness, but the maintenance of physical, mental, social and ecological well-being. Immunity, resilience and regeneration are key characteristics of health.

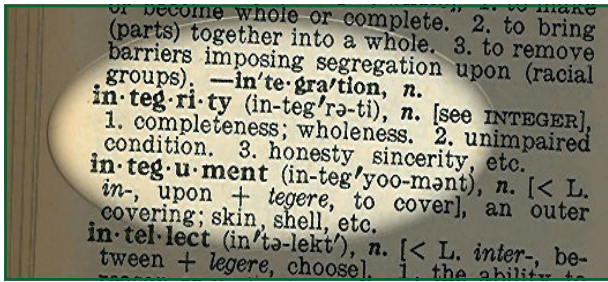
The role of organic agriculture, whether in farming, processing, distribution, or consumption, is to sustain and enhance the health of ecosystems and organisms from the smallest in the soil to human beings. In particular, organic agriculture is intended to produce high quality, nutritious food that contributes to preventive health care and well-being. In view of this it should avoid the use of fertilizers, pesticides, animal drugs and food additives that may have adverse health effects.

Principle of ecology

Organic Agriculture should be based on living ecological systems and cycles, work with them, emulate them and help sustain them.

This principle roots organic agriculture within living ecological systems. It states that production is to be based on ecological processes, and recycling. Nourishment and well-being are achieved through the ecology of the specific production environment. For example, in the case of crops this is the living soil; for animals it is the farm ecosystem; for fish and marine organisms, the aquatic environment.

Organic farming, pastoral and wild harvest systems should fit the cycles and ecological balances in nature. These cycles are universal but their operation is site-specific. Organic management must be adapted to local conditions, ecology, culture and scale. Inputs should be reduced by reuse, recycling and efficient



About the Author: David Gould

David Gould, one of ICS's Certification Committee members, has been providing his expertise in organic certification to the company since 1998. He lives in Portland, Oregon with his family.



The Principles and the Rules (Cont)

management of materials and energy in order to maintain and improve environmental quality and conserve resources.

Organic agriculture should attain ecological balance through the design of farming systems, establishment of habitats and maintenance of genetic and agricultural diversity.

Those who produce, process, trade, or consume organic products should protect and benefit the common environment including landscapes, climate, habitats, biodiversity, air and water.

Principle of fairness

Organic Agriculture should build on relationships that ensure fairness with regard to the common environment and life opportunities

Fairness is characterized by equity, respect, justice and stewardship of the shared world, both among people and in their relations to other living beings.

This principle emphasizes that those involved in organic agriculture should conduct human relationships in a manner that ensures fairness at all levels and to all parties – farmers, workers, processors, distributors, traders and consumers. Organic agriculture should provide everyone involved with a good quality of life, and contribute to food sovereignty and reduction of poverty. It aims to produce a sufficient supply of

good quality food and other products.

This principle insists that animals should be provided with the conditions and opportunities of life that accord with their physiology, natural behavior and well-being.

Natural and environmental resources that are used for production and consumption should be managed in a way that is socially and ecologically just and should be held in trust for future generations. Fairness requires systems of production, distribution and trade that are open and equitable and account for real environmental and social costs.

Principle of care

Organic Agriculture should be managed in a precautionary and responsible manner to protect the health and well-being of current and future generations and the environment.

Organic agriculture is a living and dynamic system that responds to internal and external demands and conditions. Practitioners of organic agriculture can enhance efficiency and increase productivity, but this should not be at the risk of

jeopardizing health and well-being. Consequently, new technologies need to be assessed and existing methods re-viewed. Given the incomplete understanding of ecosystems and agriculture, care must be taken.

This principle states that precaution and responsibility are the key concerns in

management, development and technology choices in organic agriculture. Science is necessary to ensure that organic agriculture is healthy,

Organic agriculture is based on:

- *The principle of health*
- *The principle of ecology*
- *The principle of fairness*
- *The principle of care*

safe and ecologically sound.

However, scientific knowledge alone is not sufficient. Practical experience, accumulated wisdom and traditional and indigenous knowledge offer valid solutions, tested by time.

Organic agriculture should prevent significant risks by adopting appropriate technologies and rejecting unpredictable ones, such as genetic engineering. Decisions should reflect the values and needs of all who might be affected, through transparent and participatory processes.”

Possible FVO Changes

ICS is notifying all operations of a possible change to the FVO manuals and will take into account views submitted before deciding on the final wording and effective date if a change is warranted in our requirements or policies.

If you have any feedback to the following issues, please provide it to ICS by July 1st, 2007. All comments should be sent to the attention of Janine Hofmann

(janine@ics-intl.com).

ICS will be discussing IFOAM standard 7.2.2 which states:

“Only substances allowed by the certification body based upon the criteria for textile processing in Appendix 1 shall be used to process fiber products labeled as “organic.”

If you would like a copy of Appendix 1, or

have any comments on the above IFOAM standard, please contact Janine.

Over the next few months, the ICS CC will be having discussions regarding aquaculture and aquatic species. If you are interested in the topics that we will be discussing, please contact Janine (janine@ics-intl.com) by July 1st, 2007 and she will release the agenda of items to you.

Help From Your CCS: Preparing for your Inspection

Whether it's your first organic inspection, or your fifth, what you need to have available on the day of the inspection – and what this inspection will entail – can still be confusing. The most important part of organic certification, and what the inspection is meant to prove, is that your product can be tracked from field or point of purchase to the consumer to be free of chemicals and contamination from non-organic products. All those in organic production know first-hand that this tracking requires a great deal of paperwork and a good organizational system in place. To help you get through this inspection, ICS has developed a few tips. Some of these may not be relevant to your operation.

1) Update your Production Plan: Each year clients must submit an updated production plan. However, it often happens that changes are made to this plan between the time they send it in and when the inspection happens. Make notes of these changes on your copy of the production plan and have copies available for the inspector.

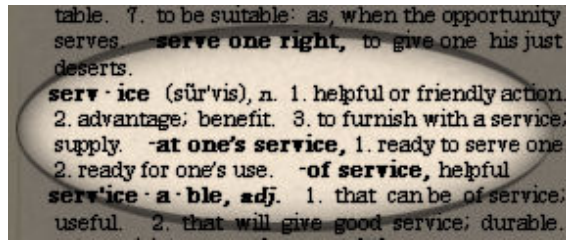
2) Resolve Previous Non-compliances: Each year clients receive documentation

of anything in their production plan that isn't in compliance or needs further information for determination of compliance

to be made. Review all non-compliances you've received documentation on and be prepared to show the inspector what actions you've taken to correct them. Make certain documents are available to provide more information on items requiring more specifics.

3) Self-audit Your Recordkeeping: Have all your records updated and available the day of the inspection. Go through your system so you can better explain your recordkeeping system and can easily find the paperwork the inspector may request.

4) Make Arrangements for the Inspection: To make the process run smoother, make arrangements to be able to devote enough time and attention with the inspector. Prepare a place – even if a kitchen table – for the inspector to be able to sit and handle the paperwork. Be



certain there will be access to all fields/facilities and appropriate travel arrangements to get to fields/facilities

that are farther away. Make certain you tell the inspector beforehand that there will be other fields/facilities that will require more time to get to so he/she can also be better prepared.

5) Be Comfortable: The inspector isn't there to find things wrong with your operation – only to ensure that your product is indeed organic. The on-site inspection is important in giving you the assurance that your philosophies and concerns are being met as well as leading to the organic certificate you need to market your organic product. It can also help you come up with better, more efficient ways of recordkeeping.

Remember, if you have any questions or are unclear of what you need to have available and what needs to be inspected, contact your Customer Care Specialist before the day of inspection.

Staff Spotlight: Brandi Eissinger

Brandi Eissinger, our Marketing Specialist, began working for ICS in March of 2004. She began as the assistant for the Customer Care Team, giving her a chance to learn more about our process and about the benefits of the organic industry. A year later she moved into the Marketing/Business Development team.

Brandi is responsible for creating all the brochures, updating the website, publishing the ICS Sustainable Times, assisting with making arrangements for trade-shows/conferences, creating presentations, other marketing duties, and assisting the Business Development Represen-

tative with new clients.

She also assists ICS' Database Administrator, helping with training and developing e-Cert for ICS, and with computer maintenance.

When asked what she loves most about her job, Brandi responded: "everything that can be done on the computer and is a challenge...which is pretty much everything I do." Brandi enjoys the constant challenges, and the knowledge she is continuously gaining.

Brandi lives in Medina, North Dakota with her husband, Tyler, and her six chil-

dren: Cassie, Alex, Caity, Dani, Jacen, and Ryan. Her husband and their chil-

dren, ranging in age from 4 to 13, take up much of her free-time.

When she isn't spending time with her family, watching movies, playing games, or helping with homework, Brandi enjoys artistic hobbies. She writes poetry and novels, creates web graphics, designs websites, sketches and paints, and also loves doing math and word puzzles.



Compost This: Random Interesting Food Facts

Americans eat the most chocolate.

Brazil grows the most oranges.

The average American eats 4 pints of ice cream each year.

Eating peppermint could help relieve stress.

The biggest selling restaurant food is French fries. They are served with 22% of all restaurant meals. Burgers are #2 at 17%.

For every dollar you spend for produce at the supermarket, the farmer makes ap-

proximately 5 cents.

The smell more people can identify most often is coffee. Peanut butter is #2.

The average North American consumes 19 teaspoons of sugar every day – mostly in processed food and beverages.

Frank Epperson from California was 11 years old when he mixed some soda water powder to

drink, but left it on the back porch overnight with the stirring stick in it. It froze solid, and the Epsicle was born. The year

was 1905. Later the name was changed to Popsicle.

Pepperoni is America's favorite pizza topping. Japan's is squid. Australians prefer eggs; pickled ginger is #1 in India. The French like fresh cream.

Even though almonds are high in calories and fat, they're good for you because they contain nutrients to help lower cholesterol.

When the power goes off, food in your refrigerator should stay cold enough to be eaten safely for four to six hours, if you don't open the door. Items in a half-full freezer are probably safe for 12 hours; a full freezer for two days.

"Have you noticed? The foods that are good for you tend to seek the back of the refrigerator?"

Contemporary Comedy

Help Desk

Organic certification can be confusing at times—even for those who've been following organic practices for several years. The Customer Care Specialists at International Certification Services, Inc are here to help answer some of your questions. Following are some of the questions they receive from clients.

Questions on Cattle:

Q: Does the straw used as bedding for organic cattle need to be organic?

A: Yes. Although it is used as bedding, cattle do still occasionally eat the straw, therefore conventional straw would compromise the organic status of your cattle.

Q: What is the difference between conventional and organic feed lots?

A: Organic livestock require more space and forage and their nutritional needs require more attention.

Questions on Crop Rotation:

Q: There are specific requirements on crop rotation; however what happens in the case of a drought (or other natural issues that arise)?

A: ICS will work with you on your crop rotation and on coming up with a rotation that will best help you and the sustainability of your land.

International Market Opportunities:

Q: Does ICS offer JAS, Bio-Suisse, EEC 2092/91, or any other international certifications?

A: JAS: ICS has a close relationship with a Japanese certifier that allows your ICS paperwork and inspection to be used as the basis for direct JAS certification of your operation. Although we cannot give you the certification ourselves, we do everything we can to help facilitate it.

EEC 2092/91: ICS can review your operation for

EEC compliancy. Although we do not give you a certificate, you will receive documentation that your product is EU compliant. ICS' reputation for integrity and quality is highly regarded by the EU import authorities and certifiers, resulting in 100% EU acceptance of ICS certified product to date.

Bio Suisse: ICS can review your operation to the Bio Suisse standards. Upon approval, qualifying product is then allowed to be sold with the Bio Suisse label in Switzerland. Our agreement with Bio Suisse coupled with the ready acceptance of ICS certified product by the Swiss authorities makes for an expeditious route to the Swiss market.

...mission, (not) fit to be used.
com·mis·sion·er, *n.* 1. a member of a commission. 2. an official in charge of a governmental department.
com·mit (kə-mit'), *v.t.* [-MITTED, -MITTING], [*< L. com-, together + mittere, send*], 1. to give in charge; consign. 2. to pledge; bind.
 —**com·mit·ment**, *n.*
com·mit·tee (kə-mit'i), *n.* [see COMMIT], a group of people chosen to act upon



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When is an Organic Cow Not an Organic Cow? (Cont)

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status and subsequently permits the administration of organically prohibited substances during the period of the brood cows non organic status. For example, during the period between when a cow weans her calf in the fall and about three months before she gives birth to her next calf in the spring, she may be treated with prohibited parasitocides and fed non organic feed. The cow is returned to organic management in late winter through the summer, but then returns to non organic management for the next fall and winter.

While critically important from a compliance point of view, to debate whether or not a technical interpretation of the rules permits such a revolving door between organic and non organic status misses the larger marketing issue. The real issue is consumer confidence, expectations and understanding of the spirit by which the organic beef game is played. Just as in school yard Kick the Can, everyone grows closer based upon shared respect and shared satisfaction. In my opinion, that is how the organic industry prospers. Producer premiums received for certified organic products exist largely because the consumer sees greater value. When the perceived value disappears, the producer premiums disappear. Certified organic beef is no different.

A revolving door for organic brood cows places the perceived value at risk! Public trust and confidence in a product is earned over time through consistent performance. In this instance, the inconsistency between the letter of the rule which appears to allow revolving door certification and the spirit of the rule may lead the consuming public to believe the certified organic beef product may be of comprised integrity. Consumers may not know the technical rules of organic production: however, they have expectations and their own understanding of the spirit by which the game is played. Brood cows that are part of a management system that move from organic status to non organic status and back to organic status within a year for the purposes of administering organically prohibited substances on it's face breaks faith with the consuming public and the spirit of the game. After all, many of the very substances a consumer hopes to avoid could be administered during that brief non organic status period. It's hard to imagine that the administration of otherwise prohibited substances which may be permitted at a particular time based upon a technical interpretation of the rules is consistent with consumer notions of product integrity.

There are many problems posed by the possibility of a revolving door organic status for brood cows. For example, compliance and inspection criteria, creeping consumer doubt regarding

other products and the value of certification itself to name a few. Irrespective of the problem areas related to this novel organic concept for brood cows, there is one common thread: consumer confidence. Consumer confidence is everything. Without it, organic producers don't exist.

My wish list for organic beef production includes a desire for the National Organic Program and certifiers to halt the organic revolving door. Providing a pathway from a non organic status to an organic status for brood cows is a good idea. Allowing animals requiring conventional treatments to eventually reclaim their organic status is also a good idea. However, to facilitate a management practice that allows brood cows to move between an organic and non organic status for the purpose of administering prohibited substances is an unethical breach of faith that, I believe, consumers once informed will not accept. So, in the end, to me, organic production is a lot like the lessons learned during Kick the Can. Everyone had a lot more fun when rules of the game and the spirit of the game were mutually respected. It turned out we treated each other better. Respectful behavior became a habit and good habits brought us closer. To me, that sounds like a prescription for success for a strong and growing organic food market.