



2025 Standard Updates & Discussion Items

The VOF Review Committee met with VOF staff to discuss producer adverse actions and create new VOF policies. We invite all certified organic producers to attend the VOF annual meeting to provide feedback on these policies and on the VOF program in general. If you are unable to attend the meeting, please do not hesitate to contact the VOF office to express your opinion. The Review Committee discussed the following clarifications in 2024, based on new and continuing applicant questions and scenarios.

Standard Updates

1) Fernco Fittings

Background:

The [Guidelines for Certification of Organic Syrup & Sap](#) require that all plastic that comes into contact with sap or syrup must be food grade. It has come to our attention that many maple producers use [Fernco Fittings](#) to connect sap lines in sugarbushes and in sugarhouses. These plastic couplings are intended for sewer and drain use only and are made from elastomeric polyvinyl chloride. They are not intended for use in food manufacturing and the State of Vermont maple regulations do not allow them. Although their use is not permitted, it's common industry practice to use them and they can be found in sugarbushes and sugarhouses throughout the state. These couplings are useful to sugarmakers because of their flexibility, ease of installation, and usefulness in connecting pipes of different sizes. VOF has confirmed that these couplings are not food grade. However, we have not been able to identify a reasonable alternative to this product. In addition, the size of these fittings are small in comparison to all of the tubing that comes into contact with sap and therefore the sap contact with the couplings is minimal. In addition, Fernco Fittings do not come into contact with hot syrup, they are only used in cold sap collection infrastructure.

Relevant Standards:

C. Production Equipment, Methods, and Syrup Storage, Sap Collection and Storage Equipment Prohibited: All plastic that comes in contact with sap or syrup must be food grade (suitable for collecting, containing or storing potable water). Please note that sewer pipe (often green) is not food grade. This is required by the State of Vermont in Title 6 Chapter 32 Section 494 e-l.

Update:

The VOF Review Committee is not proposing a change to the maple guidelines. All plastic that comes into contact with sap and syrup must be food grade. **However, because no reasonable**


alternatives have yet been discovered and because the amount of contact with the fittings is minimal, the Review Committee determined that the use of Fernco Fittings shall be phased out over a period of 5 years. After December 31, 2030, Fernco Fittings will be prohibited for use in organic sugarbushes.

2) Organic Livestock & Poultry Standards

Background:

On November 2, 2023, the NOP published a number of amendments to the organic livestock regulations, referred to as the Organic Livestock and Poultry Standards, or OLPS. This new rule was designed to ensure consistent livestock production practices and promote animal welfare within the organic industry. The primary objectives of the rule are to establish indoor and outdoor space requirements for avian species, revise the production practices for mammals and non-avian species, update the existing production practices and animal care standards, and establish clearer requirements for the transport and slaughter of organic livestock.

Update:

OLPS is a significant rule change. Please read through the attached document to determine how this rule change will affect your operation.  [OLPS Information for Producers.pdf](#)

Voting Items

1) Certification Fee Increase

Certified producers will vote on a 5% certification fee increase to balance the 2025 budget and support current staffing and program costs. The proposed fees still maintain VOF's rates as comparable to regional certifiers including MOFGA and NOFA NY. We continue to look for funds outside of producer fees to help support and run the program. VOF has secured \$91,604 in grant funding for 2025, a \$15,000 increase over 2024. NOFA-VT continues to offer financial support to VOF by paying most overhead costs, with the exception of overhead costs that are covered through grant funds. In addition, we continue to work towards making certification more accessible and to offer support to maximize success.

2) VOF Review Committee & Executive Committee Members

Certified producers will vote on the members of the Review Committee and Executive Committee.

Discussion Items

1) New UVM Tapping Guidelines

Background:

UVM Extension is recommending new tapping guidelines for the maple industry. These guidelines are based on extensive research into maple tree growth, sap harvesting practices, and a recognition that tree diameter is not the only factor that should be considered when determining

tapping intensity. In addition, the Use Value Appraisal program is proposing to adopt these guidelines as part of their draft changes to the UVA Manual that may be finalized in late 2025. If passed, producers enrolled in UVA would be required to meet these tapping guidelines. VOF currently requires organic producers to meet all UVA guidelines. Please review the proposed changes in the following document. [PDF 4 Tappingguidelinesfactsheet.pdf](#)

Relevant Standards:

I. PRODUCTION STANDARDS, A. Certification Requirements

2) A written forest management plan is required for each property used for maple sap collection. Forest management plans must meet all components and practices as required by the Vermont State Use Value Appraisal (UVA) Forest Management Plan Template and Sugarbush Management Standards for the UVA Program dated October 8, 2014 and must bear the signatures of the preparer (for example, consulting forester), land owner and county forester.

I. PRODUCTION STANDARDS, D. Tapping Management

1) It is important to allow long enough dropline lengths (recommend 36"-40") to allow vertical staggering as well as horizontal offsetting of new tap holes. Dropline length should not be less than 24".

2) The number of spouts per tree must be based on the diameter of the tree measured at breast height when there is no snow on the ground. Two tapping guidelines exist based on type and size of spout used. They both presume that trees are healthy and capable of growing 1/8" of new wood annually measured at the outside growth rings. The Appendix references the UVA Tapping Guidelines, which are the same but are described using a 2 inch diameter class (For example 10" diameter = 9.0" to 10.9" and 12" diameter = 11.0" to 12.9"). The table below shows the actual minimum diameters.

	<i>Standard Spout (3/16"- 5/16") or smaller</i>	<i>Large Spout (7/16")</i>
0 spouts	Less than 9" diameter (less than 28" circumference)	Less than 11" diameter (less than 34" circumference)
1 spout	9-14.9" diameter (28"-47" circumference)	11-18.9" diameter (34"-60" circumference)
2 spouts	15-20.9" diameter (47"-66" circumference)	19" & over, diameter (60" & over circumference)
3 spouts	21" & over, diameter (66" & over circumference)	Prohibited
4+ spouts	Prohibited	Prohibited

Requesting Feedback on the Proposed Tapping Guidelines

1. Please provide input about VOF adopting the guidelines below? The primary changes would be to prohibit 3 taps in one tree and to increase the tree diameter requirement to 18 inches if two spouts are used.

Tree Conditions	Collection Practices	Spout Diameter	Tapping Depth in/cm	Minimum Tree Diameter in/cm	Number of Taps
Conservative					
Optimal	Gravity	7/16	1-2.5 / 2.5-6.4	12+ / 31+	1
Suboptimal	Gravity or Vacuum	1/4-5/16	1-1.5 / 2.5-3.8	12+ / 31+	1
Standard					
Optimal	Gravity or Vacuum	1/4-5/16	1.5-2 / 3.8-5	9-12 / 23-31	1
				18-22 / 46-56	2

2. Do you feel that VOF should reconsider the minimum dropline length? Current minimum length is not less than 24 inches but recommended length is 36-40 inches. UVM recommended dropline length is 30-36 inches.
3. What challenges do you foresee with VOF inspectors and producers trying to evaluate tree conditions?

2) Plastic Use on Organic Farms

Background:

VOF continues to hear from organic producers who are concerned about the amount of agricultural plastic used in organic farming. Heavy plastic use is seen in all production types including maple, dairy and vegetable production. Some organic vegetable producers would like to see an allowance for biodegradable biobased mulches (BBM) to replace the use of polyethylene mulch which is currently allowed, but must be removed at the end of the growing season. These BBM mulches are [allowed in some countries in Europe](#) with stringent criteria for biodegradability but with no “biobased” requirement. The NOP regulations allow BBMs if they are:

- “Biobased” (NOP interprets this to mean 100% biobased),
- Meet compostability standards that achieve at least 90% biodegradation in soil within 2 years,
- and produced without organisms or feedstocks derived from excluded methods.

Currently, no commercially available BBMs meet this criterion. A rule change was proposed by the NOSB in 2021 to alter the minimum allowable biobased content to 80%, but this change was not

approved. The issue is controversial in the US for the following reasons: Proponents of BBM feel that removing plastic mulches at the end of the season is difficult to achieve and may lead to residual mulch fragments becoming soil pollutants. In addition, proponents feel the use of plastic mulches themselves are environmentally hazardous in that they are stockpiled, burned, and sent to a landfill, which contributes to soil and environmental pollution. BBMs are designed to function similarly to plastic mulch but presumably eliminate plastic mulch pollution by biodegrading completely when incorporated into agricultural soils. Opponents of BBM are concerned that the BBM fragments could impose long-term soil health consequences, that the use of BBM has higher initial costs, has questionable durability, and that there are still unknowns in regards to true breakdown/biodegradability.

Relevant Standards:

205.2 Terms defined. Biodegradable biobased mulch film. A synthetic mulch film that meets the following criteria:

- (1) Meets the compostability specifications of one of the following standards: ASTM D6400, ASTM D6868, EN 13432, EN 14995, or ISO 17088 (all incorporated by reference; see [§ 205.3](#));
- (2) Demonstrates at least 90% biodegradation absolute or relative to microcrystalline cellulose in less than two years, in soil, according to one of the following test methods: ISO 17556 or ASTM D5988 (both incorporated by reference; see [§ 205.3](#)); and
- (3) Must be biobased with content determined using ASTM D6866 (incorporated by reference; see [§ 205.3](#)).

205.601 Synthetic substances allowed for use in organic crop production.

(2) Mulches.

- (i) Newspaper or other recycled paper, without glossy or colored inks.
- (ii) Plastic mulch and covers (petroleum-based other than polyvinyl chloride (PVC)).
- (iii) Biodegradable biobased mulch film as defined in § 205.2. Must be produced without organisms or feedstock derived from excluded methods.

Requesting Feedback on VOF's Policy Position

VOF's position on biodegradable biobased mulch has been that our farmers support its allowance while also expressing concern and caution about protecting soil health. VOF has argued for reducing the biobased content to 80% while maintaining the stringent biodegradability and compostability standards.

1. Are you concerned about the use of agricultural plastic on your farms?
2. Are you implementing any alternatives to plastic use (in general or with mulch) on your farm or in your facility?
3. Do you support VOF's current policy position?

4. Do you think that all ingredients in BBM should be biobased? Biobased is defined as material made from substances derived from living or once living organisms. (The US requires this but Europe does not.)
5. Do you think that all ingredients in BBM should be produced without genetically modified organisms or feedstock derived from gmos? (In order to create biobased ingredients, manufacturers use genetically modified bacteria.)

Important Information!

1) New VOF Staff Phone Numbers

VOF staff phone numbers have changed! The office line remains the same at 802-434-3821 for VOF and 802-434-4122 for NOFA-VT. However, individual staff numbers have changed as follows.

Katie Birkhauser: 419-0082

Nicole Dehne: 419-0078

Bay Hammond: 419-0031

Jenn Megyesi: 419-0053

Laura Nunziata: 419-0067

Kyla Parmalee: 419-0065

Winston Rost: 419-0079

Nick Sibly: 419-0076

Alice Smolinsky: 419-0027

Gregg Stevens: 419-0046

Becca Weiss: 419-0032