

CCOF: From creating the first independent certification body to partnering with corporate agribusinesses and government regulators — selling out organic community values.

History

Organic farming was a late comer to the California ag industry. The state was big ag – growing great masses of cheap food – from the beginning. There was no heartfelt connection by small holders to Wendell Berry’s Midwestern or Eliot Coleman’s New England small-scale organic farming practices. California agriculture, conventional and organic, was – and is – capitalism in action, dependent on large investment, complex technology, and low-cost wage labor.¹

Thanks to some creative freethinkers at the University of California Santa Cruz, the area became an incubator for organic farming practices and the home of California Certified Organic Farmers (CCOF). CCOF was founded in 1973 by a group of small farmers to ensure organic standards through certification of organic farming practices.²

Growth of organic certification was slow, taking nearly 30 years to develop first statewide organic standards to the implementation of national organic standards on organic production and processing, which were codified in October 2002.³

In 2001, CCOF grew to include the CCOF Foundation, a 501(c)(3) nonprofit organization formed to source and manage federal, state, institutional, and private grants and donations and develop and execute programs to “help educate the public and conventional farmers about the benefits of organic food and farming.”⁴

From One Organization to Three

In 2002, with final implementation of the federal organic certification standards under the National Organic Program (NOP), the USDA determined that accredited certification agencies must be free from conflict of interest. In other words, no CCOF-certified member

¹ **Agrarian Dreams: The Paradox of Organic Farming in California**, Julie Guthman, University of California Press, 2004

² <https://www.ccof.org/page/our-history>

³ https://www.ers.usda.gov/webdocs/publications/42476/17382_aib780b_1_.pdf

⁴ <https://www.ccof.org/page/our-history>

could oversee the same certification program that certified their *own* business. Certification structures, systems, and processes were meant to be independent and objective, not influenced by membership, member revenues or acreage, size of certification fees, or other close connections.

As a result, CCOF was forced to restructure or face losing accreditation by the USDA. Three organizations resulted from that restructuring:

- **CCOF, Inc.**, a 501(c)(5) nonprofit, is a member-directed, politically active entity chartered as a trade association, which maintains control of the name, seal, and budget.
- **CCOF Certification Services, LLC**, also listed as a 501(c)(5) nonprofit trade association on federal tax forms, is directed by non-CCOF-certified stakeholders in the organic community.
- **CCOF Foundation** is a 501(c)(3) tax-exempt nonprofit, now described “to invest in the next generation of farmers, provide education to current and future organic professionals, and give hardship assistance to organic businesses in need.”⁵

In 2021, a new service, CCOF OCal Certification Services, LLC, (non-profit status unknown), was formed. CCOF OCal Certification Services is a comparable-to-organic program that ensures cannabis operations meet standards consistent with the National Organic Program (NOP). OCal Certified Operations display CCOF as their certifier.⁶

Can't Tell the Players Without a Program

CCOF as an organization was divided into three discrete non-profit organizations in 2002, however there is still extensive overlap in the management and at the board/trustee levels — these organizations are separate on paper only. The four current entities listed above are all located at 2155 Delaware Ave, Santa Cruz, CA 95060, where they cross in the hall, have lunch together in the organization’s kitchen, or take a stroll in the afternoon.⁷

⁵ [ibid.](#)

⁶ <https://www.cdfa.ca.gov/is/pdfs/certifiedoperations.pdf>

⁷ <https://www.ccof.org/blog/meet-ccof-staff>

While personal email addresses are somewhat standardized, a business email address can indicate the company by which someone is employed. Staff members from CCOF Inc., CCOF Certification Services LLC, and the CCOF Foundation all have email addresses with the same domain ending in “CCOF.org.”⁸ There is no separation or indication for which organization the employee is on staff.

Currently Kelly Damewood is the Chief Executive Officer, CCOF, Inc., **and** the Chair of the CCOF Foundation Board of Trustees for the CCOF Foundation, **and** the CCOF Certification Services, Management Committee Chair.⁹

There is considerable overlap between the CCOF Board of Directors and the Foundation Board of Trustees, where Phil LaRocca, Chair, La Rocca Vineyards (OTA Member); Ted Vivatson, Secretary, Eel River Brewing; and Genevieve Albers, Traditional Medicinals (OTA Member), serve on both.¹⁰

So much for independence and the avoidance of the appearance of potential conflict of interest.

Directors, Trustees, and Management Committee Members

Leadership of CCOF is dominated by large growers, consumer packaged goods (CPG) marketers, and corporate agribusiness. At the same time, CCOF Inc. is a member (and listed as a major donor over and above their dues) of the dominant organic industry lobby group, the Organic Trade Association (OTA), as are many members of the Board as well. The OTA’s mission: “Promote and protect ORGANIC with a unifying voice that serves and engages its diverse members from farm to marketplace.” What that doesn’t highlight is that the OTA is primarily a voice for food manufacturers and processors, especially large CPG companies, many with revenues in the billions.

CCOF, Inc., Board of Directors

- Phil LaRocca, Chair, LaRocca Vineyards (OTA Member)

⁸ <https://www.ccof.org/page/ccof-leadership>

⁹ <https://www.ccof.org/page/ccof-leadership>

¹⁰ <https://www.ccof.org/page/board-committees>, Accessed 9/18/23

- 110 acres, now managed by second generation
- Malcolm Ricci, Vice Chair, Bolthouse Farms (OTA Member)
 - Major corporate agribusiness invested in organics, 2022 revenue \$1.0 billion, 2,000 employees¹¹
 - Handler - CPG producer - super-premium juices, smoothies, café beverages, protein shakes, functional beverages, and premium refrigerated dressings
- Thaddeus Barsotti, Treasurer, Capay Organic and Farm Fresh to You
 - Large-scale grower/handler: estimated revenue of \$33.9 million and 116 employees¹²
 - Handler - CPG producer - grows more than 130 varieties of fruits and vegetables on 500 acres of certified organic land
- Ted Vivatson, Secretary, Eel River Brewing
 - Founded 1995; Barrels produced annually: 8,000
 - Annual revenue \$9.4 million, 33 employees¹³
- Genevieve Albers, Compliance Manager/Legal and Regulatory Coordinator, Traditional Medicinals (OTA Member)
 - Revenue is \$31.8 million, 100 employees¹⁴
 - CPG producer; Products: Dietary supplements, herbs, tea blends
- Steven Cardoza (FT), Cardoza and Cardoza Farms
 - Owner, self-employed, 6+ years, Fresno CA
 - CROPS Certified: Apricots, Grapes; HANDLING Certified: Apricots, Raisins
- JoAnn Cherry, MAHA Estate Wine/Villa Creek Cellars
 - Co-proprietor, Winemaker, Farmer - 60 acres
- Chad Crivelli, Live Oak Dairy/Crivelli Ranch
 - Live Oak Dairy Certifications:
 - US/Canada Equivalence: Withdrawn, 01/08/20
 - USDA NOP: Surrendered, 01/08/20

¹¹ <https://www.zippia.com/bolthouse-farms-careers-490355/revenue/>

¹² <https://www.owler.com/company/capayorganic>

¹³ <https://www.zoominfo.com/c/eel-river-brewing-co/16778525>

¹⁴ <https://www.zippia.com/traditional-medicinals-careers-1406489/revenue/>

- CROPS: Surrendered, 01/08/20
 - NOP List shows Crivelli Ranch, listed as William Crivelli dba Crivelli Ranch; Chad is his son
 - Certified Crops: Fruit - Tropical Fruits: Pomegranates; also farms cotton, alfalfa, melons, tomatoes, and grains
- Andrea Davis-Cetina, Quarter Acre Farm
 - Quarter Acre Farm was started in 2008 by Andrea Davis-Cetina in Sonoma, CA; the 2019 season was the farm's first season growing in Maryland
 - Certified crops: Nursery, starts, flowers, trees
- Rich Ferreira, Side Hill Citrus
 - 4th generation farmer who started with only 100 trees in 1975. Rich has been certified organic since 1991 and now has 48 acres and over 3000 trees
- Nickie Salyer, Lundberg Family Farms, Lundberg's Organic and Quality Systems Manager, and CCOF Board of Directors representative for the Processor/Handler Chapter (OTA Member)
 - In 1973 Lundberg Family Farms helped establish CCOF
 - Revenue: \$100 million, 350 employees¹⁵
 - Grows/purchases rice from nearly 20,000 acres in CA
 - Handler - CPG producer; Packaged rice, quinoa, rice cakes, rice crackers, rice/quinoa entrees, rice flour, rice syrup, and more.
- Esteban Macias Padilla, Grupo U
 - Director de Proteccion Vegetal, Grupo U, Mexico, 28+ years, in charge of the management of pests and diseases of 10,000 hectares per year of 15 horticultural products under conventional, organic, and greenhouse production systems.
 - Grupo U is made up of six of Mexico's leading companies engaged in agro-industry production, marketing, and distribution of agricultural products, with more than three decades of experience in rural Mexico.
- Liz Niles, Wise Ranch/Sespe Creek Organics
 - Sespe Creek Organics: Revenue \$1,322,000, employees 6

¹⁵ <https://www.zippia.com/lundberg-family-farms-careers-1093406/revenue/>

- Handler – waxed citrus: Oranges (Valencia Oranges), Waxed Citrus (avocados, oranges, lemons, grapefruit, and blood oranges).
- Robin Taylor, Sun Grown Organics
 - President of Sun Grown Organic Distributors, 27+ years
 - Revenue: \$8 million, 31 employees¹⁶
 - Products: sprouts, micro greens, and wheatgrass.

CCOF Foundation, Board of Trustees

- Kelly Damewood, Chair

[Note: Although not common, it isn't unheard of for a chief executive of a nonprofit to serve on the Board of Directors. Some foundations frown on this since one of the primary responsibilities of an independent board is the oversight of management. However, we have never seen a chief executive serve as chairman of the board before.]
- Phil LaRocca, Vice Chair, LaRocca Vineyards (See above)
- Jess Newman, Trustee, McCain Foods
 - Senior Director of Ag & Sustainability at McCain Foods
 - McCain Foods: revenue \$1.4 billion (2022), 4,000 employees¹⁷
 - Previously Senior Director of Agricultural Procurement & Sustainability, Anheuser-Busch, 3+ years
- Genevieve Albers, Traditional Medicinals (See above)
- Ted Vivatson, Eel River Brewing (See above)
- John McKeon, Taylor Farms (OTA Member)
 - OTA Produce Council Officer, Chair. Also officers for the OTA Produce Council are Mike Dill, Vice Chair, Organically Grown Company, and Emily Musgrave, Secretary, Driscoll's, Inc.
 - Revenue: \$2.0 billion, 20,000 employees¹⁸, 122,200 crop-acre¹⁹ field-grown program and 16 salad producing facilities

¹⁶ <https://www.zoominfo.com/c/sun-grown-organic-distributors-inc/353902043>

¹⁷ <https://www.zippia.com/mccain-foods-usa-careers-30697/revenue/>

¹⁸ <https://www.zippia.com/taylor-farms-careers-40472/revenue/>

¹⁹ <https://www.taylorfarms.com/newsroom/taylor-farms-announces-investment-with-pure-green-farms/>

- Products: Chopped salad kits, veggie trays, single serving salads
- 2021 – Taylor Farms enters the greenhouse growing market with an investment in Pure Green Farms, hydroponic farm in South Bend, Indiana

CCOF Certification Services, LLC, Management Committee

- Kelly Damewood, Chair (See above)
- Gina Colfer, Key Account Manager – Organics, Wilbur Ellis (OTA Member)
 - Family-Owned Company, \$3.6 billion revenue²⁰ – privately owned, huge agribusiness corporation
 - Products: ag chemicals, seed development, crop protection - primarily conventional products, offers 3 OMRI listed products: pesticides, fertilizer
 - Sr. Agronomist/Field Food Safety, Earthbound Farm, 5+ years
- Charles Fowler, Fowler Ranch (Retired)
 - His farm was at one time certified organic. Certifier unknown. “Fowler’s ranch, which was settled in the 1800s, is empty now.” (Per an article dated 1/15/2010, that appeared in the [Lake County Record-Bee](#))
- Janning Kennedy (Retired)
 - 2006 - Janning Kennedy was named CCOF’s Director of Certification. The newly formed position combined the Director of Handler Certification and Director of Grower Certification positions and was created to help coordinate operations between CCOF’s grower and handler programs; Janning worked with CCOF since 1988 as an inspector, chapter reviewer, chapter president, and, most recently, as Director of Handler Certification
- Tom Willey, T&D Willey Farms (Retired)
 - Previously farmed 75 acres in the Central San Joaquin Valley in Madera, California
 - CCOF Certified when in operation

Funding/Revenues

²⁰ <https://www.forbes.com/companies/wilbur-ellis/?sh=66f922f85889>

Funding for CCOF in its various facets comes from multiple sources: direct donations, a percent taken from certification fees, state and federal funding, programming and education, advertising and promotion in publications and at events, and other sources such as rents and internal cross-organization charges and payments.

- 2% Reinvestment

CCOF Certification Services generates revenue through certification fees²¹, of which two percent is transferred to the CCOF Foundation. This is not an optional donation – it is part of the certification fee.

- State and Federal Funding

Year Initiated	Amount	Awarded By	Type
2014	\$ 64,520	USDA APHIS	
2017	\$ 120,426	USDA FOOD SAFETY OUTREACH PROGRAM	Grant
2018	\$ 480,462	USDA AMS	Grant
2021	\$ 566,140	SMALL BUSINESS ADMINISTRATION	Loan
2021	\$ 165,000	California Underserved and Small Producer G	Grant
2022	\$ 15,000,000	USDA NOP	Contract
2022	\$ 3,000,000	CA Department of Food and Agriculture	Grant

Government funding primarily comes from the USDA and from the California Department of Food and Agriculture. In 2021, the Small Business Administration (SBA) provided loans through the Paycheck Protection Program (PPP) to help businesses keep their workforce employed during the COVID-19 crisis. Those loans were forgiven if the funds were used for eligible payroll costs, payments on business mortgage interest payments, rent, or utilities.

In December 2022, CCOF signed a five-year, \$15 million cooperative agreement with the National Organic Program to lead a Western/Southwestern Region for Organic Transition.²² In 2022, CCOF also received a \$3,000,000 grant from the California Department of Food and Agriculture to provide hardship assistance for drought relief.²³

Donor/Advertiser Analysis

²¹ <https://www.ccof.org/page/organic-certification-fees>

²² https://www.ccof.org/sites/default/files/Annual_Reports/2022%20Annual%20Report.pdf

²³ https://www.cdfa.ca.gov/CUSP/pdfs/2023_cusp_project_descriptions.pdf

It is not always clear from the CCOF website, annual reports, and press releases to *which* organization funds are being donated. Foundation donors are listed in the CCOF Annual Reports,²⁴ and at the end of the Annual Meeting update videos.²⁵ The Certified Organic magazine was supported by advertising until it was suspended with the Winter 2022 issue; the new digital-only Summer 2023 issue has no advertisers except for a single full-page insertion from the Organic Trade Association.

To understand more about the relationships CCOF and its subgroups have with donors and advertisers, we analyzed five years of donations to the CCOF Foundation (from 2019-2023) and five years of ad insertions in the *Certified Organic* magazine (from 2018-2022, when publication was suspended).

Donors to the CCOF foundation fall into seven categories:²⁶

- Founding Partner (top-tier donors—amount unknown)*
- Investor (second tier donors—amount unknown)*
- Visionary: Annual contribution of \$25,000 or more
- Champion: Annual contribution of \$10,000–\$24,999
- Advocate: Annual contribution of \$5,000–\$9,999
- Friend: Annual contribution of \$1,000–\$4,999
- Supporter: Annual contribution of \$25–\$999

For the purposes of our analysis, we used the base rate (i.e., Visionary - \$25,000) for each of the tiers rather than try to estimate the actual amount of the donation for each company, organization, or agency. There were 182 individual donations made during the 5-year period in the top five categories (Founding Partner, Investor, Visionary, Champion, and Advocate) providing an amount that is calculated to have exceeded \$1,800,000. We have used

²⁴ <https://www.ccof.org/page/numbers>

²⁵ <https://www.youtube.com/watch?v=zv9nKnrDR1g>

* These two levels have no published donation amount, but we assume they are much higher than the published donation tiers.

²⁶ https://www.ccof.org/sites/default/files/CCOF%20Foundation%20Annual%20Giving%20Opportunities_Final.pdf

the published value of the “Donor Opportunity Categories” as an estimate for purposes of comparison.

Donors of the 182 contributions fell into 3 groups: those certified by CCOF (45 percent), those certified by other certifiers (14 percent), and those whose organizations/companies need no certification (41 percent).

Total	Certifier	%
82	CCOF	45%
74	No Certification	41%
26	Other Certification	14%
182		

Six organizations were described as Founding Partner or Investor level donors; levels that have no donation ranges attached to them.

- Lisa and Douglas Goldman Fund - Investor
- California Department of Food and Agriculture - Investor
- Wells Fargo - \$10,000 (single donation at the Champion level) + Investor
- USDA Organic Founding Partner
- Daily Harvest Founding Partner (This was a one-time donation.)
- Sustainable Futures Fund - \$75,000 (three separate donations at the Visionary level) + Founding Partner

Advertising rates are somewhat more complicated; rates change based on whether or not the advertiser is a certified member of CCOF, size of ad insertion, and frequency of ad insertion. While other advertising opportunities are available for digital and online promotion, we limited our analysis to the printed insertions in Certified Organic magazine. Each issue includes a list of advertisers and we identified whether the advertiser was CCOF certified and the “rack rate” for the size of the insertion in each magazine.

Some ads may have been “comped,” that is provided at no cost, others may have been part of a donation “package” that included event discounts, special promotions, and media placement. As a result, we used the published rate of the advertisements as a gauge of the value received by the advertiser: it is an estimate of value for comparison.

Top 10 Donor/Advertisers

Organization	Est. Donations (Over 5 Years)	Est. Ad Value (Over 5 Years)	Total	Certifier
<i>Cal-Organic/Grimmway Farms</i>	\$125,000	\$8,580	\$133,580	CCOF
<i>Driscoll's</i>	\$125,000	\$5,795	\$130,795	CCOF
Organic Valley	\$100,000	\$1,330	\$101,330	OTCO
Patagonia Provisions	\$95,000	\$665	\$95,665	SCS
Organic Produce Network (OPN)	\$60,000	\$8,370	\$68,370	N/A
Farm Credit	\$35,000	\$19,450	\$54,450	N/A
<i>Sunview Vineyards</i>	\$50,000	\$2,825	\$52,825	CCOF
<i>True Organic Products (fertilizer supplier)</i>	\$30,000	\$22,060	\$52,060	N/A
Anheuser-Busch	\$50,000	\$1,330	\$51,330	OTCO
Bank of the West	\$50,000	--	\$50,000	N/A

The Organic Trade Association received an estimated value of \$22,600 in advertising in the Certified Organic Magazine.

Click here to view the entire donor [list](#)

Click here to view a detailed profile of top donors [Grimmway/Cal-Organic](#) and [Driscoll's](#)

CCOF Organizational Revenues (Source: 2021 IRS Forms 990)

In 2021, as a group, the CCOF business units together employed 179 people and generated revenues of more than \$26 million.

CCOF Organization, 2021	Revenue	Head Count
CCOF Inc.	\$7,449,221	42
CCOF Certification Services LLC	\$17,739,253	131
CCOF Foundation	\$1,416,500	6**
Total	\$26,604,974	179

Staff Executives and Their Compensation²⁷ (Salaries/Benefits)

** According to LinkedIn and the CCOF website, the current CCOF Foundation staff count is 6 (though the IRS Form 990 showed zero).

²⁷ Compensation from 2021 Forms 990, for CCOF Inc., CCOF Foundation, CCOF Certification Services. Includes salaries, pension plan contributions, and other benefits.

Staff salaries from 2021 IRS Forms 990, for CCOF Inc., CCOF Foundation, and CCOF Certification Services. Compensation Includes salaries, pension plan contributions, other benefits, and payroll taxes.

CCOF Inc.

- Kelly Damewood, CEO, CCOF, Inc.; Management Committee Chair, CCOF Certification Services; AND Board Chair, CCOF Foundation: \$204,083
- Ben Diesl, Chief Business Officer, CCOF, Inc. (compensation information not published)
- Harold Head, Director of IT, CCOF Inc., \$132,561
- Stephen Williams, CCO, CCOF Inc., \$131,695
- Jesse Cowan, Finance Director, CCOF Inc., \$119,137
- Rebekah Weber, Policy Director, CCOF Inc., \$113,745

CCOF Certification Services LLC

- April Crittenden, Chief Certification Officer, CCOF Certification Services, LLC, \$186,243
- Sean Feder, Inspections, CCOF Certification Services, LLC, \$139,930
- Sarah Reed, Handler Certification, CCOF Certification Services, LLC, \$123,688
- Renee Delaney, Director of Farm Programs, CCOF Certification Services, LLC, \$117,586
- Ariel Russell, Inspector, CCOF Certification Services, LLC, \$117,365
- Justin J. Hurley LLC, Contractor, Inspector, CCOF Certification Services, LLC, \$104,357

CCOF Foundation

- Jessy Beckett Parr, Chief Program Officer, CCOF Foundation, \$137,483

Compensation as a Percent of Revenue

	Total Comp.	Compensation as % of Revenue
CCOF Inc.	\$3,117,489	42%
CCOF Certification Services LLC	\$8,190,574	46%
CCOF Foundation	\$552,652	39%

(Note: Compensation Expenses include executive and staff salaries, pension plan contributions, other benefits, and payroll taxes.)

OTA/CCOF Relationships

Four members of the CCOF Inc. Board of Directors are OTA members, and two members of the CCOF Foundation Board of Trustees are OTA members. (See above)

- OTA is designated a 501(c)6 Non-Profit; category: b Donations to this organization are not tax deductible.
- 2022 CCOF is a member of both the OTA Diversity Council and the Farmers Advisory Council²⁸
- 2021 OTA Revenue: \$5,359,548, and Staff Count: 21²⁹
- CCOF has been listed in the top tier of donors to the OTA
- 2023 – 2024 OTA Board of Directors and Officers: Ed Fish, Bay State Milling and Ann Marie Hourigan, Whole Foods Market (both CCOF certified)
- Staff Crossover OTA/CCOF: Tom Chapman, Current OTA CEO, was on CCOF Certification Services Management Committee;³⁰ Cassandra Christine, Current OTA Director of Industry Relations, was CCOF Business Development for 6 years.³¹
- Board of Directors Crossover OTA/CCOF:
 - Adam Warthesen, Director of Government & Industry Affairs at Organic Valley; Organic Valley is a major donor to the CCOF Foundation.
 - Ann Marie Hourigan, Quality Standards Principal Advisor for Sourcing Standards at Whole Foods Market; Whole Foods Market is a major donor to the CCOF Foundation.
 - Mike Menes, Vice President of Food Safety & Technology at True Organic Products; True Organic Products is a very generous donor to the CCOF Foundation.
 - Kellee James, Founder and CEO of Mercaris; Mercaris is generous donor to the CCOF Foundation.

²⁸ https://www.ota.com/sites/default/files/indexed_files/OTA%20-%202022%20Sector%20Council%20Annual%20Reports.pdf

²⁹ <https://projects.propublica.org/nonprofits/organizations/232341522/202223199349331317/full>

³⁰ https://ota.com/sites/default/files/indexed_files/Tom%20Chapman%20Bio.pdf

³¹ <https://www.linkedin.com/in/cassandrachristine/>

- Ed Fish, Vice President and General Manager of Varietal Solutions at Bay State Milling; Bay State Milling is certified organic by CCOF Certification Services

OTA Events and Sponsorships

- OTA 2024 Organic Week

The OTA's 2024 Organic Week in Washington DC is sponsored by Danone North America, New Hope Network, Organic Valley, General Mills, Stonyfield Organic, Applegate, Ciranda, Driscoll's, True Organic, Ardent Mills, Bejo Organic, Mercaris, QAI (Quality Assurance International), Naturepedic, Oregon Tilth, Vital Farms, Wolf and Associates, Gallant, TasteforLife. The Organic Confluences (by OTA and The Organic Center) is sponsored by National Co-op Grocers and a grant from the USDA National Institute of Food and Agriculture. (<https://ota.com/organic-week-2024>)

(Note: New Hope Network, Organic Valley, General Mills, Driscoll's, True Organic, Bejo Organic, and Mercaris are all repeat donors to CCOF Foundation.)

- 2012 OTA Annual Fund Campaign: more than 225 companies pledged funds to support OTA's work. Top investors, named to the Leadership Circle, included CCOF Inc. (<https://www.ota.com/news/press-releases/17082>)

Six Degrees of Separation Has Contracted to One

There are intimate relationships between multibillion dollar handler operations and CPG corporations, between CCOF, its donors, the OTA (whose primary focus is to promote the marketing and sale of organic products), and the NOP and the NOSB (whose primary focus is to develop and maintain organic regulations); and the staff and volunteers for all these operations and organizations have over the years played "musical chairs" moving employment or volunteer work from one group to the other.

The "freedom from conflict of interest" envisioned by the USDA in 2002 is on shaky ground at best under these circumstances.