



The

# Inspectors' Report

VOL 16 NO 4 WINTER 2008

PUBLISHED BY THE INDEPENDENT ORGANIC INSPECTORS ASSOCIATION

## *Notes from The Chair*

By Garry Lean

It's been a busy time! Thanks for all of the extra "miles" from committee volunteers, IOIA staff and contractors and fellow Board members.

During the recent retreat in Montana, the Board adopted a new "slogan" – ***We make sure that "Organic" is really organic.*** It feels like this is core to our mission as organic inspectors – comments and suggestions are welcome.

As Paul Simon suggests, "Let's get together and form an institute": the formalization of The **IOIA Organic Training Institute** has made some initial steps – stay tuned for further developments.

Thanks to some strategic preparation by IOIA ED Margaret Scoles and the work of the IOIA Community Growers Group Committee (Luis Brenes, Chair), IOIA was able to present a position paper at the recent NOSB meeting in Washington. This is truly an international issue and will have far reaching significance in the future "Role of the organic inspector". It was a privilege to represent IOIA at this venue, and thanks also to Catherine Cash for her contributions. In summary, IOIA appears to be on the same page as NOP and ACA – see page 22 for our position paper on CGG's. Again, special thanks to **Luis Brenes** for his review of the submissions from the key contributors and the detailed feedback.

IOIA has been extra busy with training and curriculum development and the Board retreat. Demand for inspector training is strong and summaries from Pennsylvania are included here – Basic Crops, Livestock and Processing as well as a very successful advanced training.

It's not too early to prepare for the AGM and advanced training in Guatemala – the program is taking shape. Do you have some suggestions? Let the IOIA office know.

And, to **Lidia Girón**, "Thank You" for your dedication and enthusiasm on the front line in Guatemala. ☺

## 2008 AGM Set For March 2 In Guatemala

IOIA's Annual General Membership Meeting is scheduled for March 2 in Retalhuleu, about 2.5 hours southwest of Guatemala City (the airport to fly to).

Lidia M. Girón, IOIA Inspector member since 1995, is spearheading the organization of the event. Lidia, a pharmacist with training in ethnobotany, trains rural groups on the cultivation and processing of medicinal plants through FARMAYA. Lidia says IOIA members can expect very warm (86°F/38°C high and 68°F/20°C low) and humid weather. She says there are lots of flowers, birds, and trees and, "Yes, I think we will need the air conditioning" that is available at the hotel. That will be a pleasant experience for most of us chilly northerners who will enjoy the early preview of spring.

San Carlos University, along with local cosponsors of the basic course, will coordinate transportation from the airport to IRTRA for participants in the advanced course. Advanced registration fees will include transportation from the airport. Lodging will be in the San Martín and Santa Cruz hotels of IRTRA. Visit [www.irtra.org.gt](http://www.irtra.org.gt) to see the venue (Spanish language only). Spanish and English language advanced trainings will run concurrently March 3-4, with some plenary activities. Both trainings will focus primarily on the inspection of community grower groups with internal control systems. Other topics are under development. A field trip is planned to a local farm that produces coffee, macadamia, and bananas. The group will travel together and split into English and Spanish speaking tour groups. Dr. Armando Cáceres, President of FARMAYA and professor at the university, has agreed to speak to both groups on his research in medicinal plants. For further info about the advanced trainings, contact the IOIA office.

IOIA and MAYACERT-FAUSAC-MAGA-FARMAYA-CEMAT-CONCYT will also cosponsor 4.5 day Spanish language Basic Organic Farm Inspection Training using USDA NOP standards as a reference from February 25-29 at the same location.

IOIA's last AGM in Latin America was in Costa Rica in 2004. OCIA Int'l will also host their 2008 AGMM in Latin America, on Feb. 25-March 1 in Oaxaca, Mexico. The 2008 IOIA AGM is scheduled to allow members to coordinate and attend both events.

A popular regional trip in northern Guatemala is Tikal National Park, but IOIA members should plan at least 2 extra days to see it. It is accessible by short flight from Guatemala City. The park's 57,600 ha/142,000ac are covered with old-growth forests of varied plant life including monkeys, coatis and deer. Over 300 species of birds have been studied in the park and reptiles are abundant. The park's natural environment blends with the architectural ruins of the ancient city of Tikal, perhaps the most important Mayan urban center in its time. It is the only place in the world named World Cultural Heritage Site and World Natural Heritage Site by UNESCO.

Plan ahead if you don't have a passport yet. And plan to pack your dancing shoes! **More AGM info on page 3.**

## *What's Inside....*

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the ED, Int'l Training  
Reports....

*....And More!*

## 2007 Membership Directory

### Updates *Effective 12/11/2007*

Please note the following changes. Any additions or corrections to information categories other than addresses and contact numbers will be listed in the 2008 Hardcopy Membership Directory or can be viewed in the 2007 Online Directory.

#### Address Changes – Inspectors:

Luis Brenes Email: [agrivita@racsa.co.cr](mailto:agrivita@racsa.co.cr)

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Ib Hagsten Email: [ibinspects@mac.com](mailto:ibinspects@mac.com)

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#### Supporting Members:

Michael Lone  
3427 Herbert Street, San Diego, CA 92103  
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#### Supporting Business Members

Clemson University  
Chris Ray (New Contact)

#### Supporting Certification Agencies

OEFFA (Ohio Eco. Food & Farm Assn.)  
Janie Marr Werum  
41 Crosswell Rd, Columbus, OH 43214  
Work: 614.262.2022  
Fax: 614.421.2011  
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#### Welcome Returning Former Members

##### Inspector Members:

Dennis Ray Jipson  
5172 Hwy 75, Graceville, MN 56240  
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Work: 320.760.5279  
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##### Welcome New Members: Inspectors:

Lars Craik  
Upgrade to Inspector

Ken Crary  
Hop Top Organic Tillage  
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Upgrade to Inspector

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Thomas I. Schoenfeldt  
Upgrade to Inspector

Janet M. Thumm  
Upgrade to Inspector

John Wilson  
Email: [wilsonfis@msn.com](mailto:wilsonfis@msn.com)  
Upgrade to Inspector

#### Welcome New Supporting Individual Members:

Detweiler, Mark (Rome, GA)  
Dobson, Josephine (Winona, MN)  
Ehrhart, Ursula (Frankfort, KS)  
Ellor, Kristine (Tina) (Kennett Square, PA)  
Freer, Mark E. (Delano, MN)  
Geer, Carolyn (Ontario, CANADA)  
Herrera, Theodore Ralph (Pleasanton, CA)  
Holt, Mike (St. Matthews, SC)  
Hutchinson, Matt (Elgin, IL)  
Marewski, Gabriele (Homestead, FL)  
Milich, Mark D. (Broomfield, CO)  
Njoroge, John Wanjau (Nairobi, KENYA)  
Pack, Jeff (Gainesville, FL)

Pierce, Jim (LaFarge, WI)  
Pressman, Andrew (Shavertown, PA)  
Sichel, Steven (Baltimore, MD)  
Stoneman, William F. (McFarland, WI)  
Turner, Chris (Bronxville, NY)  
Ward, Joseph W. (Marion, IA)  
Williams, Jared (Belleville, IL)

#### Welcome New Supporting Business Members:

Driscoll's Strawberry Associates, Inc.  
Brian McElroy & Carmela Beck  
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Fax: 831.724.3022  
Email: [carmela.beck@driscolls.com](mailto:carmela.beck@driscolls.com)

Organic Grassfed Beef Coalition  
Ken Pigors, Director  
2404 E. Main, Vermillion, SD 57069  
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Fax: 605.395.6658  
Email: [Angela@organicgrassfedbeef.org](mailto:Angela@organicgrassfedbeef.org)

Organic Valley CROPP Cooperative  
Jim Pierce, Certification Department  
One Organic Way, La Farge, WI 54639  
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Fax: 608.625.3092  
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#### Welcome New Supporting Certification Agency:

CSI (Centre for Systems Integration)  
Jennifer Scott  
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#### IOIA Board of Directors

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The Inspectors' Report is the newsletter of the Independent Organic Inspectors Association (IOIA). IOIA is a 501 (c)(3) educational organization, whose mission is to address issues and concerns relevant to organic inspectors, to provide quality inspector training and to promote integrity and consistency in the organic certification process. Editorial Staff: Diane Cooner, Box 1259, Guerneville, CA 95446 USA. Phone/fax 707-869-3017, [ioiaweb@ioia.net](mailto:ioiaweb@ioia.net)  
Deadlines are Feb 1, May 1, Aug 1 & Nov 1. Relevant articles are welcomed. We strive for accuracy, but the Editor and IOIA cannot be held responsible for errors or omissions.  
Published quarterly  
on recycled paper.



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## Upcoming Trainings

**Hawaii** IOIA and the Hawaii Organic Farmers Association (HOFA) will offer Basic Organic Crop Inspection Training to be held February 22-26, 2008, on the Big Island, Hawaii. The course will be held at "Your Hawaiian Retreat", <http://www.yourhawaiianretreat.org> located on an organic farm about 30 miles south of Hilo. Nature walks and outdoor recreation in the sub-tropical forest on the farm are available. Attendance is limited to fifteen (15) applicants. In order to encourage Hawaii applicants who may be interested in working as inspectors, HOFA will offer US \$350.00 scholarship to selected applicants upon successful completion of the course. Deadline for course registration is February 1, 2008. Application forms are available from: HOFA PO Box 6863 Hilo, HI 96720. Ph. (808) 969-7789 Fax (808) 969-7759 [hofa@hawaiiorganicfarmers.org](mailto:hofa@hawaiiorganicfarmers.org).

**Retalhuleu, Guatemala** IOIA will sponsor Advanced Organic Inspector Training on March 3-4, in conjunction with the 2008 Annual Membership Meeting on March 2, 2008. English and Spanish language offerings will be offered. IOIA and MAYACERT-FAUSAC-MAGA-FARMAYA-CEMAT will cosponsor 4.5 day Basic Organic Farm Inspection Training using USDA National Organic Standards as a reference. The course will be held at IRTRA in Retalhuleu, Guatemala from February 25-29, 2008. Instruction will be conducted in Spanish. Please contact Noé Rivera (MAYACERT) or Lidia M. Girón (FARMAYA) phone: 502-2361 8201 and 502-2221 4967 Fax: 2361 8201 and 2230 5006 E-mail Noé at: [noe.rivera@mayacert.com](mailto:noe.rivera@mayacert.com) and Lidia at: [farmaya.sa@explonet.com](mailto:farmaya.sa@explonet.com) for further information about the basic trainings. Contact IOIA for information about advanced trainings.

**Manitoba, CANADA** IOIA and Assiniboine Community College (ACC) will sponsor Basic Organic Crop Inspection Training as a Distance Education course. The course includes a period of individualized study followed by a field trip during a weekend session held in Manitoba. The weekend session from Friday evening until Sunday evening will be held May 2-4, 2008. Course participants receive course packages that require home study and mail-in assignments. For more information and registration please contact Assiniboine Community College at phone: 1-800-862-6307 ext 6716; or 204-725-8700 from outside Canada; or e-mail: [organic@assiniboine.net](mailto:organic@assiniboine.net). Information will also be posted at [www.ioia.net](http://www.ioia.net) when available. A training for livestock inspection is under development for later in 2008.

**Iowa City, Iowa** IOIA and Iowa Organic Association will cosponsor Basic Organic Crop and Processing Inspection Trainings, running concurrently on April 16-20, followed by Basic Livestock Inspection Training running April 21-25, 2008. Location for all trainings is the Coralville Marriott Hotel & Conference Center, Coralville, Iowa in the Iowa City area. Detailed information and application forms for all trainings will be posted at [www.ioia.net](http://www.ioia.net) as soon as available.

**Hong Kong, China** IOIA and the Hong Kong Organic Resource Centre will cosponsor Basic Crop and Processing Inspection Trainings in May 2008. Training is under development.  
Other trainings: IOIA, CCOF, and Stellar Certification Services are discussing the possibility of joint Livestock and Biodynamic inspection training in northern California. Watch upcoming IOIA newsletters and the website for details as other trainings develop.

## IOIA Scholarships Available for Organic Inspector Training

IOIA accepts applications for the annual Andrew Rutherford Scholarship Award, which provides full tuition for an IOIA-sponsored organic inspector training course during the following year.

Both prospective and experienced inspectors are eligible to apply for the Rutherford Scholarship. It is awarded to an individual on the basis of need and potential as judged by the IOIA Scholarship Committee. Applicants can choose to attend any IOIA-sponsored training. The Scholarship pays for tuition, room and board but does not cover transportation or other expenses.

IOIA also offers the annual Organic Community Initiative Scholarship, which provides full tuition for an IOIA-sponsored basic organic inspector training during the following year. It is awarded to an individual on the basis of need and their potential to have a positive impact on their regional organic community. The Organic Community Initiative Scholarship is only open to applicants from outside of the US or Canada. Applicants can choose to attend any basic IOIA-sponsored training. The Scholarship pays for tuition, room and board but does not cover transportation or other expenses.

For application materials and information on IOIA training programs, contact Margaret Scoles, IOIA Executive Director, IOIA, P.O. Box 6, Broadus, MT 59317-0006, Email [ioia@ioia.net](mailto:ioia@ioia.net), or visit [www.ioia.net](http://www.ioia.net) to download application forms. The deadline for returning Scholarship applications is October 1. Scholarship recipients are notified by December 15.

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## AGM info from page 1

For those members that want to partake of some tourism after the trainings, here are some options to consider – please go to [www.ioia.net](http://www.ioia.net) and click on the 2008 AGM info link, as more details will be posted there.

**Guatemala City Tours** including Antigua, Chichicastenango & Panajachel – March 4, 5 & 6 (Tues/Weds/Thurs). The price per day includes tourist bus transportation, admission to places visited and a special guide. Meals not included. Contact Ma. del Carmen at [laxzonaviva@gmail.com](mailto:laxzonaviva@gmail.com) Lax Travel Zona Viva, Tels. 23611617/27

Day 1 – Guatemala City, ½ day – Visit the residential zone "La Cañada", Av. Las Américas, Av. Reforma, Civic Center, Historic Center, Central Park, the National Palace and a relief map of the country. Price per person US\$35

Day 2 - Historical tour – visit the Convento de Santo Domingo, parque central, palacio de los capitanes generales, palacio del Ayuntamiento, Iglesia de la Merced, Jade Museum plus other sites. Time for lunch, then Convento del hermano Pedro, the Old City, San Antonio Hot Springs and the Textile market. Price per person US\$45

Day 3 – Chichicastenango/Panajachel (Atitlan Lake) In the morning visit the open air market, and the Church of St. Thomas la Iglesia de Santo Tomás, in the afternoon visit the lake and it's surrounding 3 volcanos. Time for lunch (not included) & return to Guatemala City. Price per person US\$55

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## IOIA Audited by Alberta Firm to Int'l Accounting Principles

In June, the IOIA Board of Directors discussed the value of an external audit of the financial books. They asked why IOIA is not regularly audited. ED Margaret Scoles explained the findings of the last internal review by the IOIA Board in 2002, five years ago. She agreed that it was probably time for another audit of some scope. She reported discussions with IOIA's accountant, David Gardner, and her research on the cost of a complete formal audit. IOIA doesn't need a regular audit for many of the typical reasons. The association has never landed a large federal grant from a single source, which would make one necessary. IOIA has also not so far attracted large donors, who might request one. The annual budget is modest and the cost of a formal audit was perceived as high (estimated \$4-\$5000 annually). The IOIA accountant had suggested an annual review according to agreed upon procedures, either by the IOIA Board or an external auditor (probably an accountant). This would be similar to an organic inspection where sample audit trails are tracked, but it would be less than a full financial audit. The cost would be much lower (estimated \$1-2,000). For an organization the size of IOIA, this type of review typically is done in lieu of a complete audit.

Although IOIA is a relatively small nonprofit, it is growing rapidly. The annual budget has more than doubled in the last 5 years. The Board has a responsibility to the membership to ensure that funds are handled appropriately. The BOD decided to investigate options for an audit.

One of those options was a 2-year old offer from Colin Presizniuk, supporting business member of IOIA, to do an audit of the end of the year books for a nominal fee. He would waive the regular audit fee if IOIA would help with expenses from Edmonton, Alberta. Presizniuk and Associates specializes in the audit and review of non-profit associations. Colin describes himself as "an ambassador for auditing by nonprofits". One quick call to his office confirmed that not only was Presizniuk still interested, his interest had recently been piqued by articles in the IOIA newsletter that discussed IOIA's greater international presence. His offer for an on-site audit to international accounting principles was still good. The BOD accepted his offer in July. Colin Presizniuk, assisted by his wife Gale arrived at the IOIA office on August 27 and spent nearly 2 days completing the audit.

Initial findings in the draft audit report bring no surprises to the BOD. The good news is that every penny was accounted for. The 2006 end of the year financial statements were found accurate (with the expected disclaimer that January 1, 2006 amounts were not

validated). The primary recommendations for improvement were:

- ◆ Tighten internal controls to address the situation of one signature on checks with the ED signing all checks including those to her. The report strongly recommended a requirement for 2 signatures required for checks.
- ◆ Move to Accrual financial reporting to the members.
- ◆ Have an annual audit.

The IOIA Treasurer, Finance Committee, and BOD have reviewed the Draft Audit Report. Next step is completion of the Final Audit Report by Presizniuk's office in time for presentation to the 2008 AGM. Treasurer Gene Prochaska reports that the IOIA Finance Committee has drafted an Audit Policy for IOIA. He also says that IOIA will continue to address the issue of increased internal control of funds. This could involve adding staff, or using the services of the accountant. And the BOD will look at the benefits of moving to Accrual based reporting. Prochaska explains, "IOIA currently reports to the IRS using Accrual accounting but reports Cash basis to the membership. Cash based budgets and financial reports are generally clearer to the membership."

ED Scoles says that the audit was extremely similar to an organic inspection. "First, Colin wanted to understand our system and who did what. Then he basically did an audit balance for all the money of IOIA in 2006. I had to produce original documents, such as records of Certificates of Deposit and bank statements. Then he picked highest risk samples for closer scrutiny. In our case, this is the money processed for IOIA-managed trainings, where IOIA might collect \$100,000 or more for one event, and pay out \$80,000 or more in expenses. There are a huge number of transactions for each event. He was particularly interested in security of information and documents. He also asked a lot of questions about calculation of payroll, reporting to the federal and state government, and payroll taxes. It is definitely a plus that we have a certified accountant, Gardner, doing virtually all of those tasks. It was a really good exercise. I was pleased that the records were organized so we could find everything so quickly. One never knows until you get tested. I think that the process validated our bookkeeping system. Colin asked for some things that I always kept because it seemed like we should--such as the annual physical inventory of books that we sell. He also gave us some good reference material on preventing fraud."

## EU, from page 18

tropical crops, with working experience in Zambia, Mexico, and Costa Rica. BCS Öko-Garantie GMBH is a global, EU authorized

certification agency based in Germany. BCS is also a supporting certification agency member of IOIA. Their base of activities has been Germany since they began in 1989 as the first organic certifier in Germany. The BCS network includes branch offices in Turkey, China, Dominican Republic, Costa Rica, Ecuador, and several other countries. In 2006, BCS certified in over 60 countries. BCS also provides certification services for US certifiers that do not have ISO 65 accreditation to help their clients get products into the European market.

Will IOIA provide similar sessions in the future? Yes. The next one will probably occur after the new annexes are released. Thank you, Tobias! 🍷

## NOSB, from page 7

recommended to be relisted as an allowed, synthetic ingredient for use in regenerative casings, as an anti-caking agent, and as a filtering aid. Potassium hydroxide and ethylene were not subject to sunset because they were listed prior to 2003. Tartaric acid was not on the agenda because of a drafting error. The NOSB prematurely recommended renewing the listings for tartaric acid and carageenan in August 2005. The allowance for copper sulfate as an algicide and for shrimp control in rice in crop production was continued. While some NOSB members considered that sodium carbonate peroxyhydrate might be a viable substitute to copper sulfate, it is relatively new and has not yet been registered for use in California. Ozone gas was retained as an algicide and irrigation system cleaner. Peracetic acid was also renewed for use as an algicide, disinfectant, and for fireblight. The NOSB also renewed the allowance for restricted use of nonsynthetic calcium chloride to treat a physiological disorder associated with calcium uptake. The NOSB is aware of the EPA's reclassification of inert ingredients and plans to work on the issue in the future. The NOSB voted unanimously to retain List 3 inert ingredients for use in passive pheromone dispensers.

During the NOP report at the NOSB meeting in Alexandria, WA--J. Burton Eller, Deputy Undersecretary of Agriculture, gave a presentation on the Farm Bill. The administration proposed expansion of funding for the NOP, organic research, data collection, and cost share. Eller noted that the 15-20% growth in the sector is unique in USDA; no other agricultural sector is growing at the rate of organic. 🍷

## Notes from the ED

By Margaret Scoles

As I prepare to write my “notes” each issue, I always refer to the last issue. In this case, the last issue seems light years away. There is just too much to write about. There was so much to do. So much happened! But fortunately the pages of this issue are already full of what I’ve been doing. With less to write, I can share some moments that really touched my soul, some ‘gifts from the universe’. In this holiday season, I wish you all the best, including some surprise ‘gifts’ and some wonder. I hope you will find meaningful ministry to do and that you will be surprised and touched by those who choose to minister to you. Here are a few tidbits that fell between the cracks of regular news.

**A trip to DC and a visit with Mark Bradley, NOP:** I flew in and out of Washington DC on my way to PA trainings. It was significantly less costly. Plus I had ulterior motives. Motive #1: My sister was in DC for a literacy conference the weekend that that weekend.. By flying one day early, we had nearly 24 hours together in DC. High points were a dinner out of Restaurant Nora, the first certified organic restaurant in the country. What to have?! I couldn’t return to Montana and admit to having eaten anything but beef, so I had the locally raised organic ribeye steak. We agreed to see the National Cathedral on Sunday morning before I headed for PA. To our delight, the visiting speaker was Archbishop Desmond Tutu! The overpowering impression that I had from listening is that one cannot teach something that one has not experienced. One has to live forgiveness to be able to teach it. Motive#2: I asked Mark Bradley for an appointment on my return leg of the trip. He not only accepted, he invited Valerie Frances, NOSB ED, to join us. We had a great visit. We discussed training. It always startles me to see that IOIA has more square footage of space in our building than the NOP. I jokingly asked Mark if the staff could qualify as cage-free and whether stocking density might be in order. I had time to wonder a bit through the grounds of the Smithsonian before taking a train back to the airport, luxuriating in the warm weather that followed our wet, snowy experience in PA at the training.

**BOD retreat and a mountain top experience:** I hoped to help create an environment for the BOD to do great things when they visited this fall. The retreat began and ended with a grounding experience to create the right perspective to think great. I believe that the best way to forget cell phones and Email is to visit a powerful natural phenomena. It is part of why I have lots of rocks in my living room and no computer in my house. Thinking of these things, Erin Beard and I chose the Devils Tower in

### On Top of Mt. Patten: Margaret, Monique & Erin



Wyoming. The beginning....I had imagined a team-building experience and a western outing for the BOD. It was amazing how many things I thought of that didn’t work out, from the western lodges and my husband and the horses to a cookout at remote friend’s ranch. I finally discovered that it is allowed to scramble up to a certain staked height on the boulders at the base of the tower. I imagined that the BOD would decide as a team whether to go up, how far to go, and they would organize and help each other. It was a brilliant blue, windless, moonless day on Oct. 11. Everyone was ambling around the base and soaking up the magic of the place when Bill drew us together in a circle and started us with an unusual introductory exercise. I thought I had things figured out so that we would be driving away from the tower to the western hunting lodge for dinner and we’d see it in the background with a sunset behind it. That didn’t work out either. But what happened was better. The sun was sinking fast and suddenly, without any planning or talk at all, the whole BOD started up the boulders. No one helped anyone. No discussion. We just all went. As we sat scattered on giant volcanic boulders in this incredible place, we watched the sun sink in the vast wildness beyond. It was a long moment of wonder. A gift from the universe. When we gathered up, all a bit changed, we looked for Ray (our bus driver and county commissioner). The hunting lodge was closed for dinner when we arrived 15 minutes too late. Garry and I did our best to cajole them into serving us. We were daunted for just a moment until we managed to find a little western saloon right out of an Annie Proulx novel, where we had a great dinner. A day of surprise. And the ending....Garry, Erin, and Monique helped my husband move our little herd of cattle about 13 miles. Erin was Bob’s main cowhand and Garry and Monique helped move vehicles and get the herd safely across the highway. We have a great photo of Monique horseback. Gene and I worked in the office, threw together a dinner, and delivered it to the hungry crew. We enjoyed it in the little

homestead that is what is left of my family ranch. Then Monique, Erin and I slept over in the old ranch house in a log room. The next day, they showed me how to take 6 hours to climb a 3 hour mountain. And I enjoyed it ever so much more than usual. It was a delight to lead them over my familiar childhood places...the gypsum beds with diamond crystals 3 inches long, a big buck deer bouncing lazily over the ridge, and the teepee ring. Erin managed to get the timer set on the IOIA digital camera so we even documented our time on top of Patten Mountain (commonly called Bear Skull).

**Friend Susan and the Badlands:** My good friend Susan Colwell and I have been promising that we would both start driving toward each other and meet in the South Dakota Badlands for about 10 years. This year we did it. We spent two glorious days as one of a few dozen people visiting a natural site that sees over a million visitors each summer. It was all ours and we hiked it all. Then we returned to the IOIA office and she worked long and hard hours alongside the rest of us preparing for the PA training. I’m not sure how the work would have got done without her. I felt so ministered to and grateful.

**This season finds me full of wonder.** I leave you with this good thought from the perpetual calendar that sits on my desk:

***It is good to have an end to journey towards; but it is the journey that matters, in the end.***

Blessings on your journey! É

## NOP Sunset Rule

On Tuesday, Oct. 16, USDA's National Organic Program published the final rule for the first mandatory five-year review of materials on the National List. This includes materials that were part of the original proposed rule. Materials listed after that must still be reviewed every five years. Please note that the rule states that categories and annotations remain, but are omitted in the overview printed. Also, the Interim Final Rule listing 38 minor potential non-organic agricultural ingredients is not affected by this final Sunset Rule and remains in effect as issued in June.

<http://www.ams.usda.gov/nop/Newsroom/FedRegSunsetReview10-16-07.pdf>

## Feds OK substance for organic livestock, crop producers

The U.S. Dept of Agriculture has given a green light for immediate use by producers of an insect and mite killer dubbed "crucial" for organic crop and livestock production.

In the Dec 10 Federal Register, the USDA's Agriculture Marketing Service (AMS) said insecticide/miticide sucrose octanoate esters (SOE), recommended for use in organic crop and livestock production by the National Organic Standards Board over two years ago, is now allowed.

The amber-colored liquid bug killer is made from two biochemicals - sucrose (table sugar) and an octanoic acid ester (commonly found in plants and animals) - with an active ingredient that dissolves the waxy protective coating of pests, causing the insect or mite to dry out and die.

The NOSB recommended to the NOP in August 2005 adding SOE to the National List for use in organic crop and livestock production as an insecticide/miticide.

The final rule amends Sec. 205.601 and Sec. 205.603 of the National List regulations.

The NOP consulted with the EPA and Food and Drug Administration (FDA) to ensure that the NOSB recommendation for the use of SOE in organic crop and livestock production would be consistent with federal regulations governing the use of the substance. Both the EPA and the FDA confirmed SOE was allowed for use.

Source: *Sustainable Food New*, Dec 10, 2007

## Agency seeks applications for Integrated Organic Program

USDA's Cooperative State Research, Education, and Extension Service (CSREES) has issued a request for applications for the Integrated Organic Program for Fiscal Year 2008. Applications must be received by close of business on Jan. 9, 2008. The Integrated Organic Program includes research, education and extension activities for the Organic Transitions

Program and the Organic Agriculture Research and Extension Initiative. The amount available to support these programs for Fiscal Year 2008 is approximately \$4.7 million.

## Ag Sect'y Johanns Steps Down

President Bush on Sept. 20 announced that Mike Johanns had resigned from his post as U.S. Secretary of Agriculture to return to his home state of Nebraska, where he is expected to make a run for the U.S. Senate. Deputy Secretary Chuck Conner has been appointed Acting Secretary.

## USDA Plans e-NOP

On Nov. 28 at the NOSB meeting, Barbara Robinson, Deputy Administrator of USDA's Agricultural Marketing Service, announced a plan to post all public documents that would pass a Freedom of Information request and are from the NOP on the web. She said this move would reduce the amount of time NOP staff spends on Freedom of Information Act requests. Meanwhile, in other business at its meetings this week, NOSB moved the topic of multi-site certification from an action item to a discussion item. Thus, there will not be action taken on this issue at this time.

## EPA removes 8 inert ingredients from organic production

On Sept. 11, USDA's National Organic Program posted a link to a document to certifying agents concerning EPA action related to inert ingredients used in pesticides for organic production. Eight inert materials no longer listed on EPS's List 4 are therefore no longer allowed in pesticide formulations for organic production. Also, according to the release, "EPA has informed NOP that the 'Inerts List' system may no longer be effective or available for the NOP to reference in the Regulations." Finally, the EPA review of pesticide labels for organic production must be amended to acknowledge EPA's inert tolerance reassessments. NOP will collaborate with EPA and the National Organic Standards Board on any necessary rule amendments stemming from these changes.

## USDA Offers \$1 mil Cost-share

USDA's Agricultural Marketing Service (AMS) in late August announced \$1 million in funding under the Agricultural Management Assistance Program to defray producers' annual organic certification costs in 15 "under-served" states. The funds are allocated to the 15 states in proportion to the

number of organic producers in each state. These states, in turn, reimburse each eligible producer for up to 75 percent of organic certification costs, not to exceed \$500. For more details, contact Robert Pooler, Agriculture Marketing Specialist (202-720-3252).

## US Senate Passes Its Version of Farm Bill

The U.S. Senate approved its version of the Farm Bill in a 79 to 14 vote on December 14. Included are funding and direction for key organic priorities, including a sense that organic research be funded at a level commensurate with organic agriculture's share of the market. Some of the other provisions allot funds for organic data collection and certification cost share; would bar the USDA from charging a premium surcharge on organic crop insurance; and would add organic production as an eligible activity in the Environmental Quality Incentives Program. The Senate version and the version approved this summer by the U.S. House of Representatives must go to conference to settle any differences before a final bill is voted on by Congress.

## Canadian Gov't Invests in O

Canada's organic agriculture industry is getting a boost with nearly \$1.3 million to help accelerate its growth in Canada, according to the Ministry of Agriculture and Agri-Food and Ministry for the Canadian Wheat Board. The funding, under the national Agriculture and Agri-Food Canada's Advancing Canadian Agriculture and Food (ACAAF) program, includes \$711,500 to help the industry's major research arm at the Organic Agriculture Centre of Canada in Truro, Nova Scotia, to better identify research needs and to more effectively communicate research results back to the sector.

An additional \$565,900 will be used to develop a national sector organization, the Organic Federation of Canada, to bring together all players in the industry and raise awareness of the sector and to help with regulatory development.

OTA's *The Organic Report*, October 2007

## OFC Holds First AGM

The Organic Federation of Canada held its annual general meeting on Nov. 22, and re-elected OTA's Stephanie Wells as its President. Other officers are Julie Belzile of Filière biologique (Vice President), Arnold Taylor of Saskatchewan Organic Directorate (Chair); Paddy Doherty of Certified Organic Associations of British Columbia (Treasurer), and Janine Gibson of Organic Food Council of Manitoba (Secretary). The federation's mandate is to manage the concerns of the organic sector regarding organic regulation and standards.

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## NOSB Meeting Alexandria, Virginia November 27-30, 2007

Andrea Caroe chaired her last meeting as an NOSB member and was recognized for her service. Newly elected officers were Texas organic farmer Rigoberto Delgado, chair; Jeff Moyer of the Rodale Research Center, vice-chair; and Katrina Heinze of General Mills, secretary.

Organic aquaculture standards were a major focus of the meeting and is number one on the NOSB Livestock Committee's work plan. Aquaculture was the subject of a day-long symposium and much public comment. Most participants spoke in favor of farmed fish. Important discussion points were fish meal/fish oil from wild sources and net pens. Industry representatives advocated the '12/12 rule,' which allows 12% fish meal and 12% fish oil from wild-caught sources with a sunset.

### Livestock Materials Note to inspectors!

FLASH – as of December 12, the US Federal Register now contains the revision of the section of the National List regarding synthetic animal drugs:

[http://www.access.gpo.gov/su\\_docs/aces/fr-cont.html](http://www.access.gpo.gov/su_docs/aces/fr-cont.html) and in pdf:  
<http://a257.g.akamaitech.net/7/257/2422/01jan20071800/edocket.access.gpo.gov/2007/pdf/E7-23915.pdf>

The USDA issued a final rule on December 12, adding nine synthetic animal drugs to the National List of Allowed and Prohibited Substances.

The final rule amends paragraph (a) of SEC 205.603 of the National List regulations by adding the following substances:

Atropine  
Butorphanol  
Flunixin  
Furosemide  
Magnesium hydroxide  
Peroxyacetic/Peracetic acid  
Poloxalene  
Tolazoline  
Xylazine

The final rule became effective Thursday Dec 13, 2008.

**Pasture:** No one knows yet. Barbara Robinson, USDA, reported that the pasture docket was cleared by USDA attorneys. It goes next to the Office of Management and Budget (OMB) for up to 60 days. It is expected to face significant opposition in OMB, which has to consider economic impacts of implementing the change.

**Livestock Committee:** Animal Welfare Issues, Outdoor access of poultry, animal

care, and apiculture on the Committee's work plan. Willie Lockeretz and Kathleen Merrigan presented a paper on animal welfare that compared different international standards. The paper was first presented at the IFOAM conference on organic livestock in 2006. Margaret Wittenburg presented the Global Animal Welfare Initiative initiated by Whole Foods. She said their five step program has been approved by the Food Safety Inspection Service and addresses some animal welfare issues not specifically addressed in the NOP.

**Crops Committee:** The committee is expected to work on hydroponics and mushroom standards. NOSB member Tina Ellor of Phillips Mushroom Farms will have a key role.

### Certification of Grower Groups and other Multi-site Operations

After significant public comment (including those from IOIA, IFOAM and many others) on this highly controversial topic, NOSB tabled the Compliance, Accreditation, and Certification Committee (CACC)'s recommendation. The CACC recommendation addressed the inspection of multi-site operations, both cooperatives of small land owners (CGGs) and retail chains. Most commenters wanted some form of exemption. Barbara Robinson spoke strongly in defense of the current NOP rule requiring all inspections and indicated that certifiers have no discretion to waive the annual inspection requirement.

[To see IOIA's position on this issue, see **page 22** of this issue.]

**Policy:** Former NOSB chairs Jim Riddle and Dave Carter filed a formal complaint against current NOSB member Joe Smillie, alleging violations of the NOSB's Duty of Loyalty, Conflict of Interest, and Professional and Ethical Standards contained in the Policy Manual; specifically, the 2 complaints allege:

- 1) Smillie, while serving on the NOSB, has failed to disclose to the Board and to the public, interests where Quality Assurance International (QAI), of which he is Senior Vice President, stands to gain financially from the outcome; and
- 2) Smillie was identified as an NOSB member and failed to demonstrate impartiality by allowing his name and quote to be used in a press release.

Neither the NOP or the NOSB have posted the complaint on their websites. The Policy committee also plans to work with the NOP to create a historical database of all NOSB recommendations.

**Materials Decisions Report** (with appreciation to OMRI's report to certifiers on the meeting):

1. Gellan gum was unanimously recommended to be added to the National List as a nonsynthetic, nonagricultural, nonorganic ingredient. Representatives from CP Kelco, the petitioner, presented how it is made, some uses, and explained why xanthan gum and vegetable gums are not acceptable substitutes. Because isopropyl alcohol is used to recover gellan gum, it was previously assumed to be synthetic. However, U.S. Federal regulations set a limit of 750 ppm (0.075 percent) isopropyl alcohol.

2. The NOSB rejected a petition to allow nonorganic grape seed extract. The NOSB received negative comments regarding the listing of the substance. There are thousands of acres of organic grapes and organic grape seeds appear to be widely available.

3. The NOSB recommended the addition of potassium silicate to the National List as a fungicide and insecticide without an annotation although it will be listed as Aqueous Potassium Silicate, which effectively excludes sources derived from industrial slag. The petitioner withdrew a request to have it considered as a soil amendment.

4. Kristen Knox, spoke on behalf of the petitioner BioSafe Systems that sodium carbonate peroxyhydrate is a safer alternative to hydrogen peroxide. It was recommended as an algicide, disinfectant, or sanitizer. The substance recently received EPA approval for use as an algicide in rice, where it is expected to be a substitute for copper sulfate.

5. The petition for the molluscicide sodium ferric hydroxyl EDTA was rejected because ferric phosphate is allowed and appears to have less of an environmental impact.

6. The NOSB addressed the sunset of materials added to the National List in 2003 as well as petitions for crops and processing. Agar agar, carrageenan, calcium sulfate, animal enzymes, and glucono delta lactone were all voted to be relisted for food processing. Cellulose was also [See **NOSB**, page 4]

## Organic Standards Update

By Janine Gibson

The Canadian General Standards Board (CGSB) Organic Committee (OC) met for the second time this year in Gatineau, Quebec November 19-21, 2007. Chair Jean Duval, an agronomist from Quebec, guided the CGSB OC process in making standard revisions prior to the implementation of the Canadian regulation, which is in the midst of a 2-year phase-in, with full implementation by December 2008.

Committee Chairs have convened smaller Working Groups, conference calls and in-person meetings in preparing the revision recommendations to the OC for final in-person approval prior to general balloting. A written ballot of previously prepared responses to member comments from the August meeting was sent out to all voting members for vote by the end of November. One balloting change that will help productivity: a vote is cast on each amendment. This makes more clear which specific areas need additional research and work to build consensus for any changes.

The committee of Voting members, including IOIA, User members, and Informational members implemented such Canadian Food Inspection Agency (CFIA) requirements for standard revisions as removal of all references to certification and labeling, which will be covered more appropriately by the regulation, rather than being within the standard itself.

We're striving for a greener process so teleconferencing options were explored. Canadian Organic Growers as the meeting host organization was also thanked for being able to arrange organic and local organic food for the meetings.

**Sector Summary** Differing from the US and EU systems, the Canadian organic sector keeps the government regulations separate from the standards, which are under the guidance of the CGSB process. Agriculture and Agri-food Canada, in collaboration with the Canadian Justice Department, published a regulation at the end of 2006 that has recognized the CFIA as the competent authority. The regulation requires certifiers be accredited by any accreditation body recognized by CFIA which makes application to function in Canada. Current accreditors include the Conseil des Appellations Agroalimentaires du Québec (CAAQ), the Certified Organic Assn's of British Columbia (COABC) the Standards Council of Canada (SCC), the USDA NOP and the International Organic Accreditation Service (IOAS).

The regulation requires that organic food be produced and handled to the CGSB standards for organic production systems General Principles and Management Standards (CGSB/CAN 32.310) and the Permitted Substances List, abbreviated as PSL (CGSB/CAN 32.311). These stand as production practices regardless of whether the operations are certified. The regulations also govern the importation and labeling of organic products.

**Discussion of General Recommendations** included Certification Requirements. This resulted in recommendations to the Canadian Organic Office (COO) of the CFIA for what activities are included in organic certification (i.e. retail repackaging) and what activities will need to have secondary supervision/oversight via other relevant regulation like the Truth in Labeling Act enforced by CFIA (i.e. washing and trimming). A further general discussion included Supervision and Inspection requirements prior to allowing claims on agricultural products. This included a discussion on frequency and/or intensity of inspection to encourage Minimal Risk Certification Programs such as exist in British Columbia. Recommendations for the amendment to the Regulation were made to CFIA including mandatory reporting to the relevant certifiers in the advent of organic product contamination by prohibited inputs applied either due to accident or emergency decree by provincial or federal governments.

**Permitted Substances List (PSL)** During the last ballot the CGSB received 66 comments on the PSL regarding differences of opinion among members about changes needed and how to revise. Proposed amendments from the committee were approved by the general group or sent back for revision. The reference standards used to build the PSL include Codex, EU, IFOAM, JAS, and USDA's NOP. Also considered were the existing organic standards used in Canada by the CAAQ, the COABC, and OCPP-Pro-Cert. Canadian Organic Growers appreciates the contract with OMRI to provide technical assistance, offered by Dr. Brian Baker. Dag Falck of Nature's Path was named Chair of the PSLWG, and is responsible for coordinating the work on substances.

One contentious discussion revolved around the approval for use of the substance **Neem**. Though it was approved as a crop input it is not registered for any specific uses by the Pesticide Material Review Agency (PMRA) within Canada. Thus imported products produced with Neem can be brought into

Canada but Canadian producers are not able to legally use Neem in their production.

PMRA also presented a submission that requires operators to ensure all products used in organic production are registered for the specific use by the PMRA or face legal consequences. This clause was not approved and will be reworked prior to resubmission for balloting.

**Processing, Livestock and Crops** categories were covered by presentations from their various working groups. Some straightforward changes passed, though a majority of the presentations were sent back for more research. The processing issue receiving the most discussion was using sulfites in wine. The CGSB reviewed five options:

1. IFOAM and Codex unconditionally permit sulfites in organic wine.
2. British Columbia allows sulfites in organic wine, with a limit of 100ppm total sulfites, as does the French association of organic winemakers, FNIVAB.
3. Quebec adopted the standard of Agence Bio, a French organic trade association that is not limited to winemakers, which restricts wine treated with sulfites to a 'made with' claim and does not limit residual sulfites.
4. The NOP restricts wine with added sulfites to be labeled as 'made with organically grown grapes' and limits total sulfites to 100 ppm. The CGSB/CAN 32.310 follows the NOP.
5. The EU is silent, with various standards set by the member-states and the private sector.

The CGSB OC preferred option (2). Participants addressed processing criteria revisions, fortification with vitamins and minerals and the place of food additives in organic food.

**Livestock** One of the main issues with livestock was the allowance of copper-chromium arsenate (CCA) treated fence posts. There was consensus to remove granting discretion to certifiers to make exceptions to the prohibition. A revision of 5.2.3(b) permitting exceptions on rangeland and semi-arid regions will be sent as a ballot.

CGSB/CAN 32.310 is closer to the EU than the NOP for dairy production and closer to the NOP for meat production with regard to animal medications. There is a 14 day withdrawal for the use of antibiotics and other medications for dairy animals, while most medications are prohibited for the life

[continued on page 9]



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## Committee News

### Accreditation Committee

The Accreditation Committee is evaluating applications for the fall round of IOIA Accreditation. Results are anticipated by the end of the year, in time for the printing of the 2008 Membership Directory.

**The Accreditation Review Panel** is looking for members. The panel includes 3 inspector members, 1 certifier representative, and 1 consumer representative. If any of these positions sound interesting to you, please contact Monique Scholz at [mscholz@abacom.com](mailto:mscholz@abacom.com)

**The Membership Committee** is tabulating the results of the 2007 Membership Survey. More than 25% of Inspector members responded. It is not too late to participate via the on-line survey at the IOIA website. It will be posted through December.

**The Nominations Committee** is preparing the slate of candidates for the Board of Directors election. Deadline to nominate is January 2. If you wish to stand for election, or to nominate a member, please contact Kelly Monaghan, Membership Committee Chair, at [kellyamonaghan@sympatico.ca](mailto:kellyamonaghan@sympatico.ca) before that date. This ballot will elect two Director positions and the Second Alternate position. Current BOD members not up for re-election are Monique Scholz (Quebec); Bob Durst (Oregon); David Konrad (Ontario); and First Alternate, Erin Beard (Iowa).

**Bylaws Committee:** The Bylaws Committee considered a proposal from the BOD for a bylaws amendment to change the name of IOIA to incorporate the word "International". The committee has returned a proposal to the BOD with 3 alternatives. The first two alternatives are specific name options. The third is to poll the membership to discover which of these wordings would be most acceptable, and then schedule a vote on the preferred wording afterwards. The Board expects to mail out a ballot regarding the name change in January to coincide with the annual BOD election ballot. Arthur Harvey (Chair); Al Johnson, Lance Christie, John Trinterud, and Sue Baird.

**Scholarship Committee:** The Scholarship Committee is busy evaluating applications for the Andrew Rutherford and Organic Community Initiative Scholarships, with recipients to be announced soon. Recipients receive a full waiver of tuition for any IOIA training of their choice.

New this year, an earmarked fund has been created to help defray travel costs for OCIS Scholarship winners. This followed the committee's explanation at the 2007 AGM as to why many OCIS winners were unable to take advantage of their award. IOIA members have donated \$600 to date. If you would like to contribute, please contact the IOIA office.

**Canadian Committee:** IOIA will have a booth again at the Guelph Organic Conference this year and VOLUNTEERS are WELCOME!

Janine Gibson is serving on behalf of IOIA as a voting member of the Organic Standards Committee under Anne Lacey's dedicated leadership on the Livestock Committee, and the Permitted Substance List Working Group under Dag Falck, convening the Livestock PSL Working Group C (Livestock Substances). She will also be regularly posting activity updates on the COG-MB website, [www.organicfoodcouncil.org](http://www.organicfoodcouncil.org) Under the Producers Section, Standards Updates Page. Janine is happy to respond to any questions or concerns, contact her at [janine@rrcc.ca](mailto:janine@rrcc.ca).

**Canadian Listserv:** IOIA is starting up a new Yahoo group to which updates on Canadian organic standards revision work can be posted and from which IOIA Canadian Committee Chair Janine Gibson can solicit input/feedback. Look for the invitation in your inbox soon.

### Canadian Organic Resources

Canadian General Standards Board: [www.pwgsc.gc.ca/cgsb](http://www.pwgsc.gc.ca/cgsb)  
The full regulation, including permitted substances lists, is available at: [www.pwgsc.gc.ca/cgsb/on\\_the\\_net/organic/index-e.html](http://www.pwgsc.gc.ca/cgsb/on_the_net/organic/index-e.html).

Canadian Food Inspection Agency: [www.inspection.gc.ca](http://www.inspection.gc.ca) (the body charged with overseeing organic inspection in Canada.)

## Canada News, from page 8

of the animal in slaughter stock. There are some medications that appear on the PSL with no clarity as to how they are used. For example, hormones are prohibited in meat products, but restricted use of oxytocin is permitted, as is cortisone under the category of 'anti-inflammatory.'

Organic dairy animal pasture access is a contentious issue in Canada as it is worldwide. The Livestock Working Group leans towards a 120 day rule with no minimum dry-matter requirement for pasture.

There is a notable difference between dairy producers in Ontario, which accounts for most of the organic milk production; Quebec, where herd sizes are smaller and production is directed more at the cheese and dairy products than at fluid milk; and British Columbia, which has weather good for year-round grazing. British Columbia and Ontario dairy producers want to eliminate routine tethering and include longer periods required outside of confinement. On the other hand, Quebec dairy producers see routine tethering and longer confinement periods as necessary given the lack of grazing land and more intense climate.

Honey standards were also addressed by a separate task force.

**Crops** Commercial availability of organic seed and the use of treated seed were significant issues. The Canadian system also includes separate maple syrup production and handling standards. The CGSB OC recommended prohibiting hydrogen peroxide in maple syrup handling, even as an equipment cleaner, because it can be used to artificially lighten the color. J. Wally Hamm of Pro-Cert Chairs the Crops Committee.

**What's Next** Discussion was held on future funding for standard revisions as well as the role of providing consistent answers to questions of interpretation of the standards. These topics were referred to the Organic Federation of Canada for their consideration.

Jean thanked all participants, especially those most active on committees. The next meeting will be held in Ottawa on March 31, April 1 and 2, 2008.

*Source: JG with notes from Dr. Brian Baker*

### IOIA Board of Directors Meets for 3 day Planning Session

by Erin Beard and Monique Scholz

The IOIA Board of Directors met for its third major planning retreat October 11<sup>th</sup> thru 14<sup>th</sup> near the IOIA offices in Broadus, Montana. IOIA has had two other major Planning Retreats in the last 7 years - La Veta, Colorado in 2000 and Santa Cruz, CA in 2005. The Board also met in person for a shorter planning retreat in Broadus during the fall of 2003 and during meetings in conjunction with IOIA AGM's.

The decision to have a retreat in 2007 was made in Encinitas, following the AGM. Given that new Board members outnumbered old by 4 to 3 plus 2 new alternates combined with the need and desire to remain a viable organization in a rapidly changing organic industry, a retreat was deemed a wise investment.

IOIA's home in Broadus was selected as the retreat destination. Two doors down from IOIA's very own, newly acquired, main street building was the Senior Center where the work was done. For most Board members, it was the first time to see the building and meet and show our gratitude to the staff and community.

BOD members, Maheswar Ghimire of Nepal and Catherine Cash of Virginia were unable to attend, though Catherine did join us by phone for a business meeting. BOD Alternates, Erin Beard and Sue Baird stepped in as full participants for the retreat, joining Garry Lean, David Konrad, Gene Prochaska, Bob Durst and Monique Scholz. ED Margaret Scoles was present for the whole retreat. To



DT Lineup – Gene, Garry, David, Sue, Erin, Monique, Bob and Bill

maximize our time together, we decided to seek out a facilitator. Several candidates were interviewed by Margaret, Garry & Bob, settling on Bill Milton of Roundup, MT. An organic beef rancher with quite a resume of facilitation experience, Bill's hard work and guidance were invaluable to our process.

#### Hometown support

As we toured downtown Broadus the first morning, making stops at the accountant and bank, we were struck by the support and generosity this community provides IOIA. Mayor Lyman Amsden and his spunky wife Anne joined us for lunch. They also happen to be the donors of our office building. Local talent entertained

us on Friday night with old-time music and original cowboy poetry. Bank President, J.T. Korkow helped by taking time off work to provide discounted transportation for our facilitator to and from Broadus via his private plane. And a

#### Team Building

Our first afternoon was spent trekking a 1.3 mile loop around the base of stunning Devil's Tower as a team building exercise. Bill led us in opening discussions before we scrambled up some boulders at the base of the monument to



David Konrad – not expecting to find gourmet eats in Eastern Montana!



Lunch at The Judges Chambers with Broadus mayor Lyman Amsden & wife Ann (seated across from Margaret)

view the sunset. Throughout the retreat, Bill pushed us in exercises intended to help us know ourselves and each other better, intending to fill our tool box well enough to work effectively for the remainders of our terms.

How did the retreat unfold? As so often happens, the journey forward is started by looking back. Historical review, admission of past pitfalls and limitations, analysis of our difficulties in adapting to a rapidly changing regulatory environment, what should IOIA be? what will IOIA do? who will IOIA serve? why will IOIA do it better? – these are some of the themes we worked on and questions we tackled.

Did we reach any consensus? Collectively, we did agree that IOIA as a training institute, for inspectors and other audiences, is our strength and vocation. And we did agree on Where to go from here: Four target impacts were identified and given specific 12 month and three year goals:

- ◆ Develop Inspector protocols
- ◆ Accreditation Program
- ◆ Become a significant player
- ◆ Foster financial viability.

In the shorter term: Bill urged us to establish a short term work plan (4 months), which we did, with three targets as follows:

- ◆ Create a draft written plan for financial viability
- ◆ Launch IOIA Training Institute: repackaging our training program. Training Advisory Group.
- ◆ BOD job descriptions and accountability.

Why does this sound like we've heard it before? What is holding us back? Scarcity and being personality-driven are preventing us from realizing our potentials. At future BOD meetings, we hope to address these issues, and come closer to our goals, in addition to providing oversight for the daily business of our organization.

**We make sure organic is really organic!**

How would you define IOIA's purpose in 8 words or less? Bill put this question to the Board on day one but as the end of the retreat was nearing, we didn't have a satisfactory answer until it came to



Retreat work at the Senior Center – Bill Milton, facilitator, with David & Monique



Staff and BOD outside the new building at the community Open House on October 13. Left to Right are: Gene Prochaska (Indiana); Gordon Mulkey (staff); Judy Hessong (staff); Monique Scholz (Quebec); Sascha Drayne (staff); Garry Lean (Ontario); Bob Durst (Oregon); Margaret Scoles (staff); Sue Baird (California); David Konrad (Ontario); and Erin Beard (Iowa).

Margaret, “We make sure organic is really organic.” Now that was something we could all agree with. É



Roy Carrico, cowboy fiddler

**The Old Sheepherder**

by Norman Turnbough

There is not too many songs about  
the old sheep's voice  
But they are still my critter by  
choice.  
You might not think they are pretty  
or gonna' catch your eye,  
But I would rather step on their  
pellets  
Than I would in a cow pie.

## IOIA/KFSAO Livestock Training in Korea

The first IOIA Organic Livestock inspector training was held in Republic of Korea from September 11-15, 2007. This was the third IOIA training in Korea to be sponsored by KFSAO (Korea Federation of Sustainable Agriculture Organizations), in less than a year. Previous trainings were crop and processing with Mutsumi Sakuyoshi and Lisa Pierce as co-trainers. Lisa Pierce was the only Trainer for the livestock training. A total of 12 participants from various cooperatives, certification agencies, livestock organizations and companies attended the training that used the new Korean livestock standards as a reference. Once again, the course in September was successfully coordinated and managed by Isidor Yu. The following article written by Isidor Yu describes his account of the "Organic Development of inspection drill in Korea."



On the day of October 27, there was a big festival in the middle of Seoul. It is an annual party that began in 2006 with the participation of organic producers, consumers, environmental movement organizations, and governmental organizations – MAF and ME, blocking cars passing at a central street. The prime host was KFSAO.



**Isidor Yu with livestock farm host**

KFSAO was also the host of the first IOIA cosponsored training in Korea. It has planned the course since 2004 with HSRI, the oldest certifier in Korea. Two government officers at NAQS and Mr. Lee Taegeun, the president of KFSAO and HSRI, participated in an IOIA crop course held in the United States in 2002. Although they failed to receive IOIA Certificates of Completion due to the problem of language, the participants learned about the development of a systematic training method for organic inspectors.

KFSAO and NAQS have worked together to develop a regional inspection training program since the spring of 2003. Although there were inspection trainings hosted by KFSAO and NAQS prior to 2003 (since 2001), the trainings improved from the original simple agendas and sessions after their experiences of IOIA training.

As time went on, the inspection training program needed better systemization and to utilize a variety of instructing skills such as group discussion and role play. Organic leaders thought they needed to dispatch many inspectors from Korea to the United States to get developed training, but the problem was cost and language.

was "who can do it?" Finally HSRI decided to dedicate their resources for the organization of a training. As a result, the first IOIA organic inspector training was possible in Jeju, Korea in 2006.

In 2007, KFSAO did another experiment. It planned trainings in all inspection areas, i.e. crop, processing, and livestock. It is only a short time since the start of formal organic certification for livestock in Korea. Consequently, livestock inspection is still new and not well "methodized" in Korea. In addition, there is currently no national certification program for organic processing in Korea. This situation can be attributed to the separation and continuous controversy between our two government authorities, the MAF involved in farm produce and MOHW involved in processed foods.

Since 2004, KFSAO had made an unofficial suggestion to invite IOIA to conduct a training in Korea. Although some leaders agreed with the suggestion, their question

KFSAO has pointed out this situation and the need for an integrated, consistent organic food policy to the government. KFSAO went ahead with IOIA livestock and processing courses to prepare a developing organic market despite the structural limitation of authorities.

The attempts of KFSAO have built confidence and given potentiality to Korean organic activists. I believe the routine actions of participants, based on the experience of IOIA training, might become a stream of change and enhancement of organic systemization in Korea.

On October 20th, 11 participants of IOIA training since 2006, met together. They suggested this meeting in order to develop a formal organic inspection system in Korea. A committee was established for the foundation of the Korea Organic Inspectors Association, KOIA and Mr. Han Jungyeol, who completed Jeju crop course in Korea, was placed as the chair.

We cannot take an optimistic view for the success of this new organization because most organic inspectors in Korea, are staff of an organic certifier. There are few independent organic inspectors in Korea. Without certifiers' assistance we may not be able to found an organization. We have funding problems and need workers as well. Nevertheless we expect the currents of people trained by four IOIA courses since 2006 could contribute to the real improvement of organic area in Korea. Could you cheer us?



*Submitted by Isidor Yu, the Republic of Korea (Nov 01, 2007)*

## IOIA/BCS Curso en Latinamerica

Por Humberto González

Del 24 al 27 de Septiembre del 2007 fue realizado el Segundo curso internacional para inspectores orgánicos organizado por el IOIA/BCS, realizado Santiago, República Dominicana. Al curso asistieron 17 profesionales, ingenieros agrónomos en su mayoría y productores o encargados de actividades de producción orgánica para la exportación de las empresas más importantes relacionadas con el sector orgánico del país, entre ellas, SAVID, CONACADO, PLANTACIONES DEL NORTE, MELO, ASOBANO, BANELINO entre otros no menos importantes.. En el curso se trató de resaltar la importancia de la regulación nacional en el campo de la producción orgánica como mecanismo de control y de homogenización de criterios nacionales. Desde el punto de vista de participación y de aprobación fue de gran éxito y felicito a todos los participantes los cuales dieron un gran esfuerzo por compartir los conocimientos Durante el curso se presentaron muchas oportunidades de discutir temas de



Ecuador – Humberto and Luis were trainers



Dominican Republic - Humberto was sole trainer

The vast expertise of the trainer was enriched by the cultural diversity and the interchange of experiences held by the participants. Besides the tight and demanding agenda of the course, we



Another happy group in Costa Rica

We share lots of knowledge and hard study work, but also funny moments with great laughs were inevitable. We all made good contacts and good friends, to share our passion for organic agriculture.

interés nacional y que están afectando los procesos de producción, credibilidad y control de los sistemas de producción, lo cual no se puede cambiar si no se cuentan con las herramientas técnicas y de logística. Durante la práctica de inspección fue visitadas dos empresas productoras de Banano Fresco para la exportación las cuales fueron muy abiertas en cuanto a la atención y accesibilidad de la información. Muchas gracias a todos.

## IOIA/Eco-LOGICA Training, Costa Rica

One more time IOIA successfully co-sponsored with Costa Rican Certifying Agency Eco-LOGICA an international Basic Organic Crop Inspector Training, November 5 - 9, 2007. In this opportunity we had participants from Puerto Rico, Honduras, Venezuela, Peru, Colombia, Belize and obviously from Costa Rica. This course was directed by IOIA trainer and former Chair Director Ing. Luis Brenes, with the contribution in some themes by Eco-LOGICA's staff Ing Guillermo Saborío, Ing. Geovany Delgado, inspector and organic producer Phillippe Descamps, and in the logistic coordination of the training by Luis Iglesias.

governmental organization and production, throughout Latin America.

During the course we get to visit an organic coffee farm and two horticultural greenhouse farms, where the participants could apply all the gained knowledge in developing their first attempt on inspecting an organic farm.



## Organic Crop Inspection Training Port Matilda, PA, USA

By Bill Stoneman ,McFarland, WI  
Nov. 12 – Nov. 16, 2007

I started the week of training with high expectations and ended the week with even greater expectations of myself as an inspector trainee and of organic crop production in general. One of the keystones of learning the NOP and the role of the inspector was the environment set by the training team of IOIA board members. I'm writing not only the beautiful retreat center nestled in Penn's Woods (Pennsylvania) where the training was held but of the learning atmosphere set for the training from the onset. The outcomes of the training were clearly delineated and the expectations of the trainers well defined. The trainers were experienced veteran inspectors and organic production consultants and taught with facts, good resource materials and anecdotal style.

I entered the training program with a lot of experience in crop production practices and solid natural resources, agronomy and soil science education. That was a good basis, but now I feel equipped to do the job of an inspector under the National Organic Program Standards. I now have a clear understanding of the role and expectations of the inspector and am looking forward to an apprenticeship somewhere in the Midwest and being "the eyes, ears and nose of the NOP and certifying agencies" where ever I am called to inspect. I clearly understand "the primary role of the inspector is to gather on-site information and provide an accurate report to the certifier." The organic farm inspection was a highlight of the week – the culmination of learning the process of inspecting. I have more to learn yet through experience as an inspector, but the IOIA training program has given me a strong base and set the right direction.



The 26 participants in the IOIA/PCO Basic Crop Inspection Training, Trainers Garry Lean and Luis Brenes, helper Margaret Dickson, and Margaret Scoles at St. Joseph Institute in PA. Garry, Luis, and Margaret Scoles served as group leaders on cold and rainy Day 4 of the course, just before the rain turned to heavy wet snow for the remainder of the event. Hosts for the field trip included Sabine Carey, one of the PCO inspectors. Luis said she worked hard to make the experience more challenging for their team. Another host was the Pennsylvania State University Research Farm organic research plots.

## Processor Training in Pennsylvania

By Monique Scholz

At the request of regional certifier PCO (Pennsylvania Certified Organic), IOIA put on a 4.5 day Organic Basic Processor Inspection Training, in Port Matilda, Pennsylvania November 12-16. The training was held at the St Joseph Institute, nestled in 250 acres of snow dusted oak and maple woodlands.

The lead trainer for this Organic Training was Monique Scholz from Québec, assisted by Stanley Edwards, from Idaho. Our valiant ED, Margaret Scoles from Montana, was guest speaker for two sessions. Amy Talarico, an inspector member from central Pennsylvania, was an additional group leader. The course was attended by 26 participants, including certifier staff from as far away as Hawaii, active inspectors from across the US (and Saskatchewan, Canada), and a number of food industry QC managers keen to learn how to navigate and meet the NOP requirements.

Despite the relatively large group size, a good working atmosphere developed and there were many dynamic question and answer sessions. The IOIA trainers continue to fine tune the OHP-based learning activities. They also launched a new grading scheme, taking pressure off the final report and exam, while crediting pre-course work, homework, and some in-class assignments.

Two intense field trips were generously hosted two regional facilities, the PARADISE VALLEY FEED MILL and FURMANO

FOODS. To make the most of travel time, bus transportation was arranged. As always, participants were pleased to put their new skills to test and the pedagogical opportunities were very good. Special thanks to Michael Campbell, of St Josephs Institute, for so readily accommodating our organic feed requirements (and other special requests).





**Livestock training attendees**

## Basic Livestock Training in PA

Fourteen participants from as far away as Hawaii and Costa Rica took the Basic Livestock Inspection course November 16-21 under the guidance of Trainer Garry Lean. The group included inspectors, certifiers, and industry representatives. Al Johnson, veteran inspector in the area, joined the group on Days 3 and 4 of the course. Garry and Al guided their groups through mock inspections at local dairy farms. Hubert Karreman, VDM, was guest speaker on the topic of Organic Livestock Health.

## Update on WFM Animal Welfare Training

Participants in the first Whole Foods Market 5 Step Animal Welfare training in Austin Texas received this message on November 28, during the recent NOSB meeting:

“We have taken your comments very seriously and Whole Foods has dedicated significant resources to getting the Standards, Producer Guidance, Auditor Guidance and 5 Step

Animal Welfare Rating Program right before launching the program. This work is very close to completion and we are hoping to publish the standards and launch a world class, global 5 Step Animal Welfare Program in early 2008.

“Margaret Wittenberg will be making a presentation at the NOSB meeting announcing that Whole Foods Markets will donate all of this work to the Global Animal Partnership™, a new international non-profit animal welfare organization. The Global Animal Partnership™ will be the keeper of the Standards and Guidance documents. The 5 Step Animal Welfare Rating Program™ will provide verification oversight and, as before, will work with independent, third - party verification organizations and auditors to verify compliance to the Global Animal Partnership™ Animal Welfare Standards.

“Thank you for your patience as we move the 5 Step Animal Welfare Program forward globally. We are very excited about the opportunities that this program creates and you will be among the first to know when we formally launch the Global Animal Partnership™ and the 5 Step Animal Welfare Rating Program™.”

## USDA Certifier Training *Open only to USDA-accredited certifiers, state agents*

The USDA's NOP will conduct certifier training on its regulations at three locations in 2008. The Accredited Certifiers Association and the National Association of State Organic Programs will host a professional development training and other events in conjunction with the Southern Sustainable Agricultural Working Group (SSAWG) conference in Louisville, KY, Jan. 14-16, 2008. As part of the training events, the NOP will offer a free training to accredited certifiers on Jan. 14 from 9 a.m. to 5 p.m. There is a two-person limit per agency. Contact NOP (202-72-3252) to register. The one-day professional development training for certification staff will be held Jan. 15. Accommodations and additional info: [www.accreditedcertifiers.org](http://www.accreditedcertifiers.org). A second session will be held at the BioFach Conference in Nuremberg, Germany Feb. 20. The third session will be April 26 at the All Things Organic trade show in Chicago, Ill.

## Mentoring Opportunity

John Njorge of Nairobi, Kenya participated in the Basic Crop Inspection, EU Organic Regulation, and Advanced training courses in PA. John founded the Kenya Institute of Organic Farming in 1987, and has been training farmers and development agents through the Institute since then. He has authored books on organic production. His participation in the PA trainings was sponsored by Dean's Beans Organic Coffee Company. Dean Cycon, president of the company, describes John as 'a tireless champion of organic farming'. John gave a brief presentation on organic production in Kenya during the crop inspection course.

After returning to Kenya, John wrote IOIA to say, “It was wonderful for me to attend the IOIA crop inspector's training course. I learned a great deal and made many friends. I was particularly happy to comprehend the NOP Standards and to learn how to use these standards in crop inspection. The extra training on EU organic Law (Comparison to NOP Standards) and the advanced IOIA Inspector's course were great eye openers for me. I am now back in Kenya and ready to start reviewing the training. I am writing to thank you for everything and also all those who participated as resource persons.”

John has joined IOIA. What's next? He asks IOIA for help in identifying and finding a mentor who would help him complete an apprenticeship in crop inspection. He is willing to travel back to the USA to complete the apprenticeship, if he can find a willing mentor and a place to stay while he completes 4-10 inspections.

If you are interested in mentoring John, his Email is [kiof@iconnect.co.ke](mailto:kiof@iconnect.co.ke).



## Advanced Organic Inspector Training

Submitted by Bob Howe, Trainer

This training was held November 18th and 19th. The site for the training was a Spa Resort named "St. Joseph's Institute", in the northern Appalachian Mountains, in Central Pennsylvania, a few miles from Penn State University. The site provided ultimately comfortable accommodations for the attendees who stayed on site and meeting rooms that were very adequate and free from distraction. Food was very good, nearly all organic, and much of it donated.

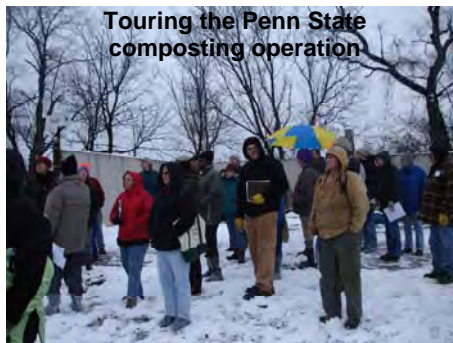
The training focused on three areas of auditing and inspection; Materials (in general for all types of organic entities), Livestock (emphasis on dairy animals) and topics pertinent to organic handling.

### Materials

The Materials presentations included a half day titled "Inspecting Inputs for Organic Operations"; presented by Dr. Brian Baker (founder and current Research Director of OMRI) and Renee Mann (Quality Systems Manager at OMRI). The presentation covered the process by which brand materials are evaluated and added (or not) to the "OMRI Products List", including the parallel comparison to the work that organic certifiers and inspectors do to verify a client for organic certification, proving to be very similar. There are opportunities for organic inspectors to become involved with OMRI through performing inspections for them.

This OMRI presentation also covered the technique of obtaining various types of materials samples and the procedures and documentation needed to maintain the appropriate chain of command.

Emily Brown Rosen presented the subject of "Organic Integrity and Secondary Materials Issues", alluding to the grey area "additives" with reference to



FDA definitions and regulations. Central to the presentation was the conflict of the FDA regulations (under 21 CFR) and the NOP regarding ingredients,

processing aids and sanitizers, in terms of allowing the use and what has to be on the label. This is a technical subject with many unclear imperatives, where the OFPA and NOP

leave a final authority to the FDA and where certifiers normally apply their own interpretations. Her presentation explained how the scope of National List is limited by 21 CFR for Direct and Secondary Direct Additives and GRAS, and further confused by the exemptions for Food Contact Substances and Indirect Additives "as classified by FDA". Those in attendance came away with a much better understanding of the subject and the problems that inspectors and certifiers are faced with.

Emily provided examples in order to demonstrate. She also explained just how an applicant for an additive and the FDA go about having the additive listed as a Food Contact Substance (FCS) through the Food Contact Notification process (FCN) and how this compares with the apparently stricter NOP policy. Through her presentation, she was clear that:

- ◆ Materials in direct contact with organic food should be on the National list for handling.
- ◆ NOP policy still stands but may be subject to further legal action
- ◆ Certifiers may have different policies.

### Livestock

Dr. Hubert Karreman, VMD, talked about his experiences with the 80 herds of dairy cattle under his care and his observations of other cattle during his travel through the rural Lancaster countryside. Dr. Karreman is the Chair of the NOSB Livestock Committee. Dr. Karreman was a herdsman at what was and is a recognized, humane farm. Particular emphasis in his presentation was placed upon the organic dairy farm. He always avoids the use of methods and medications that would take an animal out



Dr. Hubert Karreman visits with inspector Christine Ouellet

of the certification, but would not hesitate to medicate if the situation was serious and the animal's life and welfare would be at risk.

He explained that the organic farmer, in some cases, was more interested in maintaining the organic status of the herd. The economic effect of removing an animal to non-organic status, particularly in the smaller herds, could be significant. The case is sometimes that the farmer will delay treatment and/or use unproven remedies to cure a sick animal rather than call in the Vet earlier. With non-organic herds, more often than not, the farmer will act more quickly to treat an illness. Another concern was that many farmers do not quarantine a sick animal and the sickness can spread through the herd. He urged organic inspectors to look for these incidences and tell the farmer and, at a minimum, make an appropriate comment in the report.

Dr. Karreman talked about the livestock living conditions and cited NOP references. He emphasized that organic inspectors need to do more than just look at the animals and the medical records. Inspectors must persist with questions about the treatment and feeding of the animals, particularly if/when the inspector is concerned in any way about the conditions.

Dr. Karreman sees little change in a farmer's methods and the way the farmer manages the herd over time. This being the case, an organic inspector will probably experience the same. He recommended that the farmer needed to keep records of calls made to Veterinarians and the treatment they did on the farm. The best way, he said, was to for the farmer to provide a journal that a Veterinarian would complete upon a



visit, including treatments made and treatments recommended, even if the farmer refused the treatment. He also talked about animal identification. In his opinion, the tag on a neck chain was not acceptable because it can be lost or, an unscrupulous farmer could switch the tag to another animal if it would benefit him or her.

It was clear that Dr. Karreman believed in organic certification for dairy herds. It was also clear that there were problems for the animals as a result of organic certification and that inspectors needed to be more vigilant during their inspections. Sarah Flack, of NOFA-VT Organic Dairy and Livestock Technical Assistance and inspector, provided information and resources that an inspector can use to determine the nutritional value of the dairy rations being provided. Sarah's presentation included a listing of several websites where data on harvest volumes for various feed crops can be obtained, specific to regions, and websites where conversions for dry matter and nutritional value of feed can be obtained.

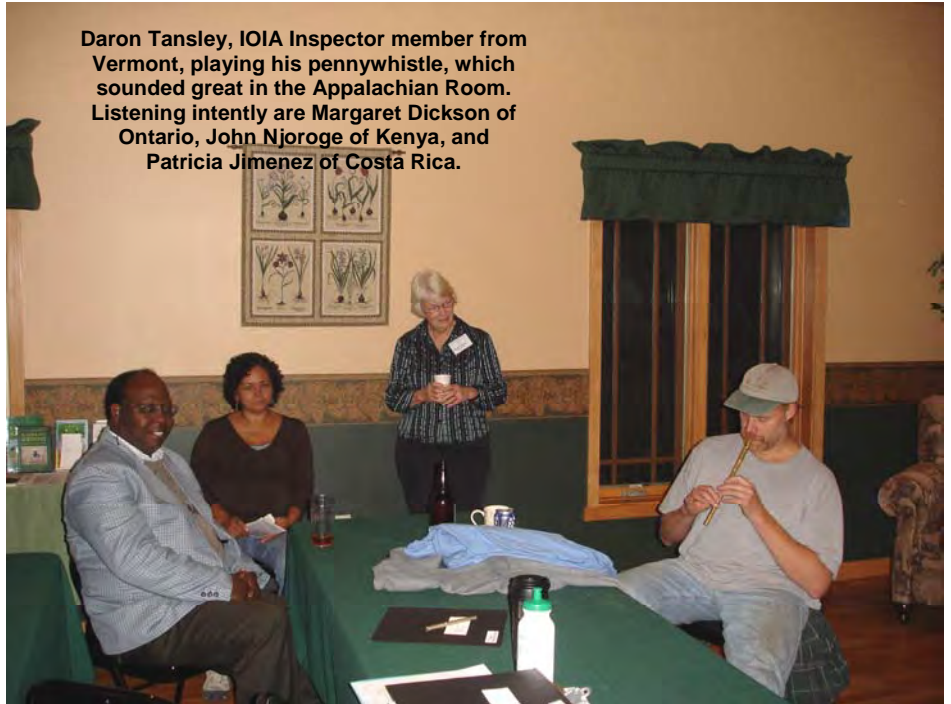


Sam Welsch spoke about labeling issues pertinent to the ID of the 'handler' and the 'certifier'

Dr. Gregg Martin talked about Poultry Health. Dr. Martin explained how an audit of poultry health was conducted with regard to living conditions of space provided, bedding, food, water, and light and outside access. He compared types of confinement and moveable pasture, explaining the potential for parasites and transfer of disease from passing bird populations.

**Handling**

Sam Welsch, Director of One Cert, presented the One Cert Product Profile format. Sam showed examples of several



Daron Tansley, IOIA Inspector member from Vermont, playing his pennywhistle, which sounded great in the Appalachian Room. Listening intently are Margaret Dickson of Ontario, John Njoroge of Kenya, and Patricia Jimenez of Costa Rica.

product profiles to demonstrate how the Excel form is used to generate the true percentage of organic ingredients in a recipe (available with instructions at <http://www.onecert.net/>).

Maarten Samsom discussed how 205.201(a)(3) is not always adhered to by the certified entities and how adherence can and does enhance and facilitate inspections. He also demonstrated how the level of compliance to the NOP is improved when entities apply it. The text of the section is "A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented."

Maarten explained that he begins an inspection by asking the client when they last monitored (performed an "internal audit") the effectiveness of their OHP. He explained further that the clients seem to welcome the opportunity as it is an empowering activity, particularly for the QA person or other individual who has little authority to enforce the OHP otherwise.

Additionally, Maarten queried the group to ascertain the reasons why people were attending the training and why they were involved in the organic movement. The greatest number stated that they were trying to have a positive impact on the environment, second was the belief that organic food is better in terms of nutrition and food safety. With that information, Maarten briefly expressed his concerns

about the use of materials that are harmful to the environment; such as the sanitizers (quats in particular) and pest control chemicals that are contaminating the ground and water in great quantities. He expressed that his belief is that organic is more than just compliance to the obvious and pointed out references within the regulation that imply a holistic standard, and inspectors and CB's need to include the effect on the environment when auditing and reviewing the clients for certification.

Bob Howe presented an overview of inspecting restaurants for organic certification. The overview included the main areas of concern and what must be considered when performing a restaurant inspection. The presentation covered the subjects of "certification Status", "type of menu", "sources of supply", "facility" and "audit trail". [Read Bob's article in full in the *MembersOnly* section, [www.ioia.net/](http://www.ioia.net/)] É



Bob Howe presents on organic restaurant certification

## IOIA and BCS Cosponsor First EU Regulation Training

By Margaret Scoles

Tobias Fischer of BCS Öko-Garantie Bio and IOIA presented a one-day training the European Organic Regulations (EEC 2092/91) to a packed audience of nearly 40 participants on Nov. 17. The session preceded the Advanced Training at St. Joseph Institute in rural PA. Fischer, in the US for only the second time of his life but an experienced trainer, was undaunted by the large and diverse group. He broke the presentation periodically with mini-workshops where experienced inspectors, certifiers, and those who had just attended their first basic training days earlier grappled with practical application of the standards.

The scope of the current EU reg is limited to unprocessed agriculture crop/livestock products (including mushrooms and beekeeping), processed agricultural crops and livestock products intended for human consumption, and feedstuffs for livestock. As an example, medicinal plants can be certified, but not medicines, as they are not considered 'for consumption'. Fresh flowers and fresh tobacco can be certified but not flower bouquets or cigarettes. Similar to the NOP, aquaculture, forestry, cosmetics, and clothing are beyond the scope of the current European regulation. However, organic references or private organic labels (no official organic labels are allowed) on these products might be seen, because they are not regulated. Those products cannot identify the certifier or bear the EU seal. Unlike the NOP, the EU regulation protects both the terms 'organic' and 'bio' even to the point of oversight of products where a consumer would reasonably perceive them as 'organic' from the label.

Both the current regulation and the new (EC 834/2007), which will replace EEC 2092/91, were addressed. EEC 2092/91 has been revised more than 40 times. The new regulation began with a plan to simplify the document in June 2004. EC 834/2007 was passed June 28, 2007, but the annexes have not yet been released. Implementation is still uncertain. The EU Commission announced that it expected to announce rules and lists by the end of 2007.

The new regulation has a broader focus on environmental quality. The principles make excellent, inspirational reading. An important change is the allowance for certification of wine, yeast, and aquaculture (but not wild caught fish). Another is the elimination of the 70% to 95% category. A significant change will be the establishment of a central approval (accreditation) system for certifiers. None currently exists. The EU seal will be mandatory, although certifier seals may accompany it. Imported organic products labeled with the EU seal will have to be labeled as 'Non-EU-Agriculture'. Textiles and

cosmetics will still be excluded from certification.

Fischer explained the import process into the EU. Exporters from countries on the third country list are not required to get import authorization, however, the import certificate (also transaction certificate) is mandatory for exports from any country outside of the EU. He provided a gap analysis of the NOP vs. EU and ended with a quick summary of GLOBALGAP, the currently re-named which replaces EurepGAP. The session ended with a handout-- a summary of the differences between NOP and EU. This resource was prepared by Sam Welsch for the Advanced training held earlier this year in Encinitas. It is available upon request from IOIA to Inspector members.

A few key differences in the EU regulation:

- ◆ The conversion period for crops is 2 years before sowing, grassland: 2 years before harvesting and perennials: 3 years before first harvest. Conversion period begins when the certification agency is informed and the first inspection is on its way.
- ◆ Processed products between 70% and 95% must show the precise percentage. Percentage is calculated as the percentage of organic agricultural ingredients of the total weight/volume of agricultural ingredients, which is very different from NOP.
- ◆ Only products  $\geq 95\%$  produced in the EU may display the EU seal.
- ◆ Factory farming manure is prohibited. Tobias explained that poultry manure is the only manure input that is scrutinized by the import authority. After spirited discussion about the definition of 'factory farming', he gently but firmly took the group back to the real-world. He reminded them that other manure is not scrutinized. It was good to have a black and white answer for this general gray area.
- ◆ Parallel production is prohibited. Fischer clarified the definition of 'visually distinguishable'. In common terms, it means that a child off the street can tell the difference. It is interpreted by some European authorities so strictly that they will not allow organic wheat and non-organic rye on the same farm. 'Separate units' means legally separate (separate deeds), so apparently companies often create a separate company for organic. Unfortunately, even after the mini-workshop, this area still stayed somewhat



gray as to defining separate production units.

- ◆ Chilean (sodium) nitrate is prohibited. The NOP allows it with an annotation.
- ◆ All input lists are positive lists, where an input must be on the list before it can be used. Ingredients are strictly regulated but inputs allowed on organic products (i.e. when cleaning or washing) are not regulated. That will change with the new regulation.
- ◆ There are no exemptions (such as the  $< \$5000$  NOP exemption). Everyone, including those who simply buy and sell or store, must be certified.
- ◆ Inerts are not regulated in crop and livestock pest control materials.
- ◆ Allowed ingredients lists differ. Processing inputs allowed by NOP but not by EU are hydrogen peroxide, ozone, and others.
- ◆ Significant differences exist in organic livestock regulations, including the allowance of antibiotics and some non-organic feed. Stocking densities are prescribed.
- ◆ Composting is not defined.

There are more similarities than differences, including a permitted ingredient list for non-organic ingredients (similar to NOP 205.606). The EU has published a guidance document for certification of CGGs ('group of small scale producers' in EU language). Group certification is generally not allowed in developed countries, but in Germany some federal authorities allow a similar approach for the inspection/certification of small scale fruit growers.

It was 2001 in Canada when IOIA last sponsored such a training. Silke Fuchshofen of BCS's US office in New York first brought the idea for this one to IOIA. The enthusiastic response from participants underscores the scarcity of such training. Fischer is responsible for coordinating BCS offices in Central and South America and Africa. His training is in horticulture, specializing in [see EU, page 4]

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## MINUTE HIGHLIGHTS

### BOD Ex-Comm Conference Call - July 26 2007

**Present:** David Konrad, Bob Durst, Garry Lean (Chair), Gene Prochaska, Monique Scholz and Margaret Scoles.

**Financial Audit** Moved by Gene, seconded by Bob, to proceed with audit by Colin Presizniuk. Motion adopted. It was agreed that sample transactions from 2004 -2005 would only be audited if significant issues are encountered in the audit of 2006.

**Processor training discussion** Info about Samsom & Associates Processor Training had circulated by email. Role of Margaret and Monique clarified. Use of IOIA materials was discussed. It was decided that if material is used, IOIA should be paid on a per-participant basis, in addition to receiving credit. Margaret and Monique to refer to Editorial Review Board for guidance.

### BOD Conference Call - August 16 2007

**Present:** Erin Beard (as alternate in place of David Konrad), Bob Durst, Maheswar Ghimire, Garry Lean (Chair), Gene Prochaska, Catherine Cash, Monique Scholz and Margaret Scoles.

**Treasurer Report** BOD members had received treasurer's report, income/revenue statement, budget projections and dues chart by email. Treasurer presented highlights: explanation of deficit, upcoming audit schedule, and the need to tackle the issue of financial stability at the upcoming BOD retreat. Gene is hopeful that the auditors' report will be ready for the retreat and will lead to development of an audit policy (by the finance committee). After some discussion about dues, further discussion and decision were deferred to next meeting.

#### Action Points:

- ◆ Finance Committee to develop audit policy AFTER audit report rec'd.
- ◆ BOD must decide 2008 dues at the September meeting (in time for October).
- ◆ Financial stability is a key issue for discussion at BOD retreat.
- ◆ Validate decision to go ahead with retreat on Pennsylvania registration deadline (Sept. 24).
- ◆ Re-visit personnel policy to ensure that pay increases are adequately addressed there-in.

Moved by Bob, seconded by Catherine, to accept the treasurer reports. Motion adopted.

#### Action Points:

- ◆ ED will send TRAINING report by email.
- ◆ BOD kindly review proposed MEMBERSHIP SURVEY (prepared by Membership Committee) and send comments to BOD liaison Bob. The Committee is targeting an October 01 release date.
- ◆ BOD requests that Committee include questions about training costs.

### BOD Conference Call - September 13 2007

**Present:** Sue Baird, Bob Durst, Maheswar Ghimire, Garry Lean (Chair), Gene Prochaska, and Margaret Scoles. David Konrad joined the call at 8:25. Monique Scholz and Catherine Cash were unable to participate. Sue, as 2nd Alternate, was recognized as a voting member for the meeting. In absence of Secretary Scholz, Margaret Scoles took minutes.

**2008 Membership Dues** Garry asks BOD to look at table provided in 2nd Quarter Treasurer's Report and asked if Gene, as Treasurer, had a recommendation for 2008 Inspector dues.

Gene reminded the BOD that costs are going up and we are in a tight situation financially. He recommended an increase to \$150/yr dues, noting that we need the results of the upcoming membership survey. Moved by Sue, seconded by Bob, to increase Inspector dues from \$125/yr to \$150/yr. All in favor. Motion adopted.

Discussion continued, focusing on Supporting Certification Agency dues. These have been at \$250/yr since IOIA was founded. The BOD expressed interest in exploring ways to increase participation in this category. IOIA provides the same service to smaller certification agencies as larger ones. Some certification agencies belong to IOIA but are only represented in the Supporting Business or Supporting Individual category. Moved by Sue, seconded by Gene, to increase

supporting certification agency dues from \$250/yr to \$275/yr for 2008. All in favor. Motion adopted.

**BOD retreat** The BOD planned the BOD Retreat in Broadus.

**Fundraising:** Dave shared that Elizabeth Franklin had sent him an Email of a draft fundraising letter. He added that to do effective fundraising, we need to be able to communicate clearly what it is we want to be.

### BOD Conference Call – October 11 2007

**Present:** Sue Baird (non-voting alternate), Erin Beard (alternate for Maheswar Ghimire), Bob Durst, David Konrad, Garry Lean (Chair), Gene Prochaska, Monique Scholz and Margaret Scoles (ED). Catherine Cash present by phone.

**ED report of Non-profit conference** Margaret emphasized low cost to IOIA; found event very motivating and gained a lot of 'professional development'. Attended session for executive directors. Learned that many BODs have 'job descriptions' for Board members. Found exercise of ED profile (ideas people) validating. Helpful sessions about business planning, non-profit financing. Our organization is actually self-financing to 98%, which is unusual for non-profits. Job descriptions for BOD: three aspects: funding raising, governance and policy. BOD self evaluation is important (in our retreat program). New books for IOIA from the conference: Mission Based Management, and Good to Great and the Social Sector.

**Action point:** BOD member job description (generic, not position specific). Refer to what is already in Policy Manual.

**IOIA Name Change** Dave reports on progress in putting ballot together. He contacted Arthur Harvey (bylaws chair).

Motion: To propose by-law amendment to replace the word Independent by the word International in the name of our association. By Dave, seconded by Catherine. Passed unanimously. Discussion: alternatively: Independent Organic Inspectors Association International.

**Action Point:** Possibility to add by-line under name, to cover the independent (third party) auditing aspect. This does not have to be part of bylaws. Give by-line options to membership. Invite their suggestions. Consensus to proceed this way.

**Membership Committee chair** Motion by Bob, seconded by Erin, to appoint Kelly Monaghan as chair of Membership Committee. Approved unanimously.

**Accreditation Committee chair** Monique as liaison person reports resignation of McKeon, Grealy and Greenberg.

**CGGs:** Margaret reports that Luis expressed a widespread dissatisfaction with the current NOSB position on CGGs. Luis briefed Margaret on how to get IOIA on speaking roster. Discussion deferred to post retreat meeting.

### BOD Conference Call – October 14 2007

**Present:** Sue Baird (alternate for Catherine Cash), Erin Beard (alternate for Maheswar Ghimire), Bob Durst, David Konrad, Garry Lean (Chair), Gene Prochaska, Monique Scholz & Margaret Scoles. Retreat go-around - Bill Milton requested comments on what could have been better, what was good in the PROCESS.

#### Action Points:

- ◆ Garry will transmit this feedback to Bill.
- ◆ Margaret: Mission Based Management book copy to all BOD members.
- ◆ Facilitator a must for retreats: advise future BOD of this.
- ◆ Monique with Erin: BOD retreat report with photos, for Nov 08 as it would appear in newsletter. 📷

*Note from Nov 8 meeting (not yet approved) minutes - the BOD allocated \$1000 in the 2008 budget toward assisting participation by IOIA members from Latin America to attend the AGM and Advanced training.*

## GMO NEWS

### Brazil's Landless Peasants Occupy Syngenta Plants

Hundreds of activists broke into a Swiss-owned Syngenta agrochemical plant in the state of Sao Paulo on December 10, expelling 50 employees and shutting down production, a company spokeswoman told Reuters.

Members of the Landless Rural Workers' Movement, or MST, and the allied group Via Campesina also destroyed genetically-modified corn and soy seedlings at a Syngenta farm in the northeastern state of Ceara, the groups said.

The groups demand Syngenta leave Brazil, accusing the company of attacking landless workers and violating environmental laws.

One farmer activist opposed to the farm's work with genetically modified (GM) seeds died and a security guard were killed in a clash on October 21 at the 304-acre farm owned by Syngenta AG. Four activists and four security guards were also injured by the gunfire, according to Agencia Brasil, the country's official news agency.

The MST said the farm illegally produced genetically modified crops within an environmental protection zone around the internationally-acclaimed Iguacu water falls. Syngenta, the world's largest agrochemical company, said in a statement that it was dismayed by the occupations and that it had no participation in the October death.

The company said it was awaiting a decision from public prosecutors based on police investigations into the shooting of Valmir Mota de Oliveira. Activists accused private security guards at the farm for shooting Oliveira.

Three hundred Via Campesina activists first invaded the farm in March 2006, breaking down the gates and setting up tents to publicize their claim that research there into GM soy and corn is illegal.

Syngenta won a court order in July to expel them. The company, Schoen-maekers said, "never did anything wrong or illegal in Brazil." Parana's state government has also tried to confiscate the farm, saying Syngenta's research is illegal and that the property should be transformed into an educational center for environment-friendly agriculture.

Brazil allows research into GM seeds and the use of the seeds for some crops, but their use is opposed by groups like Via Campesina and some government officials, particularly those in Parana, which borders Argentina and Paraguay. The state government there recently banned the use of GM corn seeds by farmers.

Syngenta is one of Brazil's top agrochemical retailers, and a leading researcher into GM crops.

Source: <http://www.forbes.com/feeds/ap/2007/10/22/ap4245254.html>; Reuters, Dec 10 2007

### USDA Announces Plan to Improve QC of GM Products

On September 20, 2007, Acting US Agriculture Secretary Chuck Conner announced a new program to help universities, small businesses, and large companies develop sound management practices to enhance compliance with regulatory requirements for field trials and movements of genetically engineered (GE) organisms. The new Biotechnology Quality Management System, a voluntary compliance assistance program, is scheduled for initial implementation in spring 2008. Full article at:

<http://www.isb.vt.edu/news/2007/news07.nov.htm#nov0701>

### Do Escaped Transgenes Persist in Nature?

*The case of an herbicide resistance transgene in a weedy Brassica rapa population*

#### Abstract

The existence of transgenic hybrids resulting from transgene escape from genetically modified (GM) crops to wild or weedy relatives is well documented but the fate of the transgene over time in recipient wild species populations is still relatively unknown. This is the first report of the persistence and apparent introgression, i.e. stable incorporation of genes from one differentiated gene pool into another, of an herbicide resistance transgene from *Brassica napus* into the gene pool of its weedy relative, *Brassica rapa*, monitored under natural commercial field conditions. Hybridization between glyphosate-resistant [herbicide resistance (HR)] *B. napus* and *B. rapa* was first observed at two Québec sites, Ste Agathe and St Henri, in 2001. *B. rapa* populations at these two locations were monitored in 2002, 2003 and 2005 for the presence of hybrids and transgene persistence. Hybrid numbers decreased over the 3-year period, from 85 out of 200 plants surveyed in 2002 to only five out of 200 plants in 2005 (St Henri site). Most hybrids had the HR trait, reduced male fertility, intermediate genome structure, and presence of both species-specific amplified fragment length polymorphism markers. Both F1 and backcross hybrid generations were detected. One introgressed individual, i.e. with the HR trait and diploid ploidy level of *B. rapa*, was observed in 2005. The latter had reduced pollen viability but produced 480 seeds. Forty-eight of the 50 progeny grown

from this plant were diploid with high pollen viability and 22 had the transgene (1:1 segregation). These observations confirm the persistence of the HR trait over time. Persistence occurred over a 6-year period, in the absence of herbicide selection pressure (with the exception of possible exposure to glyphosate in 2002), and in spite of the fitness cost associated with hybridization.

Source: *Molecular Ecology* 2007 Oct 29 2007; <http://www.blackwell-synergy.com/doi/abs/10.1111/j.1365-294X.2007.03567.x>

Correspondence: Dr Suzanne Warwick.

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E-mail: [warwicks@agr.gc.ca](mailto:warwicks@agr.gc.ca)

### Bt Crops Threaten Aquatic Ecosystems

Scientists find wastes from transgenic Bt corn impair growth of common aquatic insect and call on future risk assessment to include aquatic ecosystems previously overlooked.

In 2006, 35% of the 33.1 million hectares of the corn planted in the US was transgenic, modified to express the Bt toxin *Cry1Ab* from *Bacillus thuringiensis*. Bt corn is widely planted in the Midwestern US, often next to headwater streams. Yet, no environmental impact studies have been made of Bt crop by-products on stream insects such as caddisflies (trichopteran), which are common in streams, and closely related to the lepidopteran (butterflies and moths) targeted by the *Cry1Ab* protein in Bt corn.

As a group, the caddisflies have diverse feeding habits. Some are filter - feeders, others scrape biofilms off submerged surfaces, and still others feed on detritus. All these caddisflies may consume Bt corn by-products.

A team of scientists led by Emma J. Rosi-Marshall at Loyola University in Chicago Illinois have now carried out the first study on the fate of transgenic Bt corn wastes in headwater streams next to the fields and their impact on the caddisflies.

In laboratory trials, leaf-shredding trichopteran *Lepidostoma liba* fed Bt corn litter had less than half the growth rate of controls fed non Bt corn litter; while 43% of *Helicopsyche borealis*, an algal-scraping trichopteran, died when fed high concentrations of Bt corn pollen (2 to 3 times the maximum input expected during Bt corn pollen-shed) compared with 18% mortality in controls fed non Bt corn pollen. In the field, 50% of filtering caddisflies collected during pollen-shed had pollen grains in their gut and detritus-feeding trichopteran were found in the accumulations of decomposing corn litter.

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## Resources

**Organic farming data:** The September issue of Amber Waves published by USDA's Economic Research Service, includes an article by Catherine Greene on the expansion of international and U.S. organic farming.

<http://www.ers.usda.gov/AmberWaves/September07/DataFeature/>

**ERS Posts an Info-Packed "Organic Briefing Room"** USDA's Economic Research Service posted on August 22nd a useful "[Organic Briefing Room](#)" that provides easy access to dozens of USDA reports and data sets. Highlights include detailed statistics on organic crop and livestock production by state through 2005, organic wholesale and farmgate prices, and the milk production costs and return survey that included a large sample of organic dairies.

[www.ers.usda.gov/Briefing/Organic/](http://www.ers.usda.gov/Briefing/Organic/)

USDA's Economic Research Service has posted new information on procurement practices and use of contracts by certified organic handlers (packers, shippers, manufacturers, processors, brokers, and distributors). The interactive data contain select results from the 2004 Nationwide Survey of Organic Manufacturers, Processors, and Distributors. Procurement information includes basic characteristics of organic handlers, their purchasing practices, and their relationship with suppliers, including important supplier attributes. Contracting information includes the use of written and verbal contracts between organic handlers and their suppliers.

<http://www.ers.usda.gov/Data/OrganicHandlers/>

**King Corn** is a feature documentary about two friends, one acre of corn, and the subsidized crop that drives our fast-food nation. Ian Cheney and Curt Ellis, best friends from college on the east coast, move to the heartland to learn where their food comes from. With the help of friendly neighbors, genetically modified seeds, and powerful herbicides, they plant and grow a bumper crop of America's most-productive, most-subsidized grain on one acre of Iowa soil. But when they try to follow their pile of corn into the food system, what they find raises troubling questions about how we eat—and how we farm. [www.kingcorn.net/](http://www.kingcorn.net/)

**Farm Bill Food Battle** This YouTube video presents Farm Bill issues in an engaging, accessible manner. Free Range Studios, along with Vera Cherilov, Anna Lappé, and a number of terrific sponsors and farm bill consultants have worked together to create this resource. The National Campaign Farm Bill Hero Campaign is featured as the link in the "Learn More" section of the heading entitled: "Demand a Fair Farm Bill". <http://foodbattle.org/>

**New Guide – IPM** This guide updates TB 82-6, Biological Control of Insects, and provides a representative sample of Library of Congress titles on the control of agricultural pests. Not intended as a comprehensive bibliography, this compilation is designed—as the name of the series implies—to put the reader "on target."

[www.loc.gov/rr/scitech/tracer-bullets/pestmanagementtb.html](http://www.loc.gov/rr/scitech/tracer-bullets/pestmanagementtb.html)



### **Farm to Hospital: Supporting Local Agriculture and Improving Health Care**

Direct sales from farmers to hospital food service departments are helping ill people eat better and recover faster. This six-page brochure from the Community Food Security Coalition and the Center for Food & Justice (CFJ) at Occidental College addresses the ins and outs of developing partnerships between hospitals and local farms, looks at ways hospitals can improve the food they offer, tells how farmers can effectively market to hospitals, and provides case studies of successful efforts.

[http://www.foodsecurity.org/F2H\\_Brochure.pdf](http://www.foodsecurity.org/F2H_Brochure.pdf)

### **Country Of Origin: Should You Know Before You Buy ???**

[http://www.agmatters.net/attachments/Country\\_Of\\_Origin.doc](http://www.agmatters.net/attachments/Country_Of_Origin.doc)

### **Disaster Readiness and Recovery: Legal Considerations for Organic Farmers**

Natural disasters pose a significant threat to all farmers, but organic farmers affected by natural disaster have particular concerns. To address these concerns, Farmers' Legal Action Group, Inc. (FLAG) has written a new article which focuses on aspects of federal disaster assistance that are of particular relevance for organic farmers. [www.flaginc.org](http://www.flaginc.org)

### **A Growing Movement: A Decade of Farm to School in California**

Farm to school programs were initiated a decade ago in California and have been growing ever since. The Center for Food and Justice tells the story of how these programs evolved and tracks their impact on students, farmers, and communities throughout the state. Steady progress in increasing crop yields and animal production levels has often been achieved at the expense of food nutritional quality, the environment, and in some cases, food safety and animal health.

[http://departments.oxy.edu/uepi/publications/a\\_growing\\_movement.pdf](http://departments.oxy.edu/uepi/publications/a_growing_movement.pdf)

### **Still No Free Lunch: Nutrient levels in U.S. food supply eroded by pursuit of high yields**

This "Critical Issue Report" from Brian Halweil at the Worldwatch Institute documents the extent of nutrient decline, reviews ways that farmers and breeders can increase nutrient density, and explains the importance of doing so in order to improve public health.

[http://www.organic-center.org/science.latest.php?action=view&report\\_id=115](http://www.organic-center.org/science.latest.php?action=view&report_id=115)

### **"Handbook of Organic Food Safety and Quality" Released**

Woodhead Publishing has released the long-awaited, 521-page, 23-chapter volume on organic food quality and safety. European authors wrote 20 of the chapters, two were by U.S. scientists, including The Organic Center's Chief Scientist Chuck Benbrook, and one chapter was by a Canadian team. The Center has posted a brief overview, the Table of Contents, and information on ordering.

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## IOIA's Position on CGG's

*Two excerpts from NOSB comments, presented by IOIA Chair Garry Lean in Washington, DC on November 28. Thank you also to Luis Brenes for the large amount of time he spent on this project.*

Based on inspectors' experience and the NOP record, IOIA's position is that grower group certification does not constitute any higher risk than other inspected operations. It is simply a different inspection scenario with its own particular characteristics and challenges. Certified grower groups do not represent a sector with a higher proportion of non-compliances or more cases of revoked products.

That said, the 2006 NOP summary of appeals (administrative ruling process) did identify one case of a grower group that raised questions about the procedures and criteria for grower group certification.

The ruling process specifically questioned:

- a) the sampling procedure by which the certifier inspects part of the fields that belong to the group as a tool to verify the internal control system, and
- b) the qualifications, conflict of interest avoidance, and regular evaluations of the internal inspectors who belong to the internal control system.

IOIA believes these two main concerns can be dealt with, within the present structure. It would be a mistake to consider that grower group certification is merely a compromise to help poor small farmers, in the US or in developing countries, OR to accept that the organic labeling for their products is less meaningful or of diminished value. IOIA believes grower groups represent a diverse reality and, as such, require and deserve creative, effective, and rigorous inspection requirements in order to maintain organic integrity.

The NOSB's Certification, Accreditation, and Compliance Committee (CACC) issued a recommendation in early October for the NOSB BOD to review at this November meeting. This recommendation broadens the concept of grower groups to include other types of multi-site operations like handlers and retailers. However, it does not fully address the two main issues brought up in the NOP ruling process. In addition, this CACC recommendation had a minority opinion report.

Concerns have been voiced about this recommendation and there appears to be substantial support for the minority opinion.

IOIA agrees that multi-site operations certification deserves a thorough analysis and discussion. IOIA requests, as many other organizations have, that the NOSB keep the two topics separate.

The Organic Trade Association—OTA, the International Federation of Organic Agriculture Movements—IFOAM, the Accredited Certifiers Association—ACA, the National Association of State Organic Programs—NASOP, and the National Organic Coalition—NOC, have all submitted public comments. These organizations, representing a wide range of interests in the United States and abroad, have presented comments with a high level of agreement and few differences. IOIA sees this as evidence that grower group certification has not been under loose or no control simply because it was not specifically regulated in the federal rule. The level of consistency of comments received reflects that the organic sector has been able to self-regulate this area throughout the years, by discussing and improving the criteria and guidelines. The three international workshops sponsored by IFOAM in 2001, 2002 and 2003 contributed to this voluntary standardization of the practices and procedures.

IOIA agrees with the NOC comment that grower group certification must be a separate and specific category of accreditation. Certifiers would need to be evaluated in terms of competence in this category.

IOIA does not support the replacement of the NOSB 2002 "Criteria for Certification of Grower Groups" with the recent proposal of its Certification, Accreditation, and Compliance Committee on Multi-Site Operations Certification. IOIA proposes the NOSB review its current policy (2002) to address the two main issues raised by the NOP ruling process.

We believe ACA's, NOC's and OCIA's proposed amendments address these main issues. We agree on the need to have a working definition for "production unit", the need to inspect all production units of a group every year, and the need to do a sample audit of sites based on a risk assessment conducted for each group.

IOIA offers the following additional comments (to points as outlined in the NOC comment re. Grower Groups 10-16-07) related to:

- a) The requirement that all growers in the group have same production practices, including the use of same inputs. We suggest replacing it with "similar" rather than "same" as it might be misinterpreted in

the future that all growers must use exactly the same inputs and perform exactly the same practices. This approach will not be consistent with the organic principles that demand site-specific approaches to maintain and improve soil fertility, minimize soil erosion and prevent phytosanitary problems. The organic system plan needs to be the same for all farmers but allow for sufficient diversity in order to be adapted to site-specific conditions. If not, farmers will probably use approved inputs but use them in a way that is not consistent with 205.203(a) and 205.206 items (a) through (d).

- b) A maximum gross income of \$5000 over which a grower cannot be part of the group. As the limited access to certification that most small growers experience is not only related to financial reasons, but also to cultural, social, language and written communication limitations, we suggest that growers over that amount can still be certified as part of the certified entity if they are inspected annually by the accredited certifier.

- c) The requirement that growers cannot sell their organic products outside the group. We suggest, for the sake of clarity, to add "certified" organic products. Otherwise, the requirement would discourage the production and sales of other non-certified organic goods that growers produce.

- d) The requirement that every grower has a copy of NOP standards.

Even if it is provided in their language (and NOP standards have not been translated yet to all languages included in the great diversity of existing grower groups) we know from our experience as inspectors that it will not be really meaningful nor contribute to the organic integrity. We believe more in setting a strict standard that requires adequate grower training, not only on organic practices but also on organic standards and certification. Such training needs to be tied to the distribution of an internal rule that adapts, summarizes and translates in proper language and communication media the aspects of the NOP federal rule that are applicable to the group's particular conditions.

- e) The requirement that internal supervisors meet the same requirements as organic inspectors as defined in 7 CFR 205.501. Requirements for accredited certifiers staff and inspectors are not all applicable to internal supervisors. As a matter of fact, some of them will be completely incompatible due to the intrinsic condition that internal supervisors work for and/or belong to the certified entity. This is covered in the regulation in 205.501(a)(11) items (ii), (iii) and (v). ❁

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## INDEPENDENT ORGANIC INSPECTORS ASSOCIATION

IOIA has several publications for sale. Order here or through our website, [www.ioia.net](http://www.ioia.net).

**Please add 15% for Shipping and Handling.**

- Farming with the Wild: Enhancing Biodiversity on Farms and Ranches; Written by Daniel Imhoff, Watershed Media, 182 p.; 2003; \$20.00
- Organic Dairy Farming, Edited by Jody Padham, Community Conservation, Project coordinated by MOSES, 156 p.; 2006; \$15.00
- Building Soils for Better Crops (2<sup>nd</sup> Edition), by Fred Magdoff and Harold Van Es. 240 pp. \$20
- COG Organic Field Crop Handbook, 2<sup>nd</sup> Edition, Expanded and Rewritten. Published by Canadian Organic Growers. An invaluable resource. While preserving the best of the now out-of-print and no longer available first edition, this edition is updated to include info on GMO's, *E. coli* issues in manure, and many additions to the crop section. 222 pages, spiral bound, \$30.00.
- Managing Cover Crops Profitably, 2<sup>nd</sup> Edition, published by Sust. Ag Network, \$19.00
- Organic Livestock Handbook, published by Canadian Organic Growers. Edited by Anne Macey, 179 pp, spiral bound, \$30.00
- Organic Tree Fruit Management, published by COABC, 240 pages, \$30.00
- Steel in the Field, published by Sustainable Ag Network, 128 pages, \$18.00
- Introduction to Certified Organic Farming. Published by REAP Canada, 200 pg. 25.00



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I AM INTERESTED IN THE FOLLOWING:

**IOIA Membership Application**

Please specify category - all funds payable in US  
\$ - All dues are annual

- Inspector - \$150
- Supporting Individual - \$100
- Business/Organization \$125
- Certifying Agency - \$275
- Patron - \$500
- Sustainer - \$1000

The Inspectors' Report - 4 issues/yr - \$30

2007 IOIA Membership Directory:

\$15 members  \$25 non-members

IFOAM/IOIA Int'l Organic Inspection Manual:

\$45 members  \$60 non-members

## 2008 Calendar

**Ongoing through May 13** The CCOF Foundation's *Going Organic* project launches its fall and winter season packed with over 20 educational trainings throughout California. For info, contact Fred Thomas at: fred@ccof.org or go to: www.ccof.org/goingorganic.php

**January 12** "Grow Your Own Nitrogen" Workshop Utilizing Cover Crops, Lincoln, Nebraska. This workshop discusses sustainable agriculture with application for organic systems. Learn about the effects of flaming on weeds and crops. www.nerec.unl.edu/nitrogenworkshop.shtml

**January 16 - 19** Practical Tools and Solutions for Sustaining Family Farms Conference, Louisville, Kentucky. Southern Sustainable Agriculture Working Group presents its annual conference, featuring Pre-conference Intensive Courses, Field Trips, 64 Conference Sessions, Taste of Kentucky Dinner, Wendell Berry, Joel Salatin and much more. www.ssawg.org/

**January 18 - 19** Minnesota Organic Conference, St. Cloud, MN. Workshops, trade show, discussions. Info and registration at www.mda.state.mn.us/food/organic or call 651-201-6012.

**January 19** Intensive Mini-school Series for Community Supported Agriculture (CSA), Tustin, Michigan. www.csafarms.org/csaresources.asp

**January 23 - 26** 28<sup>th</sup> Annual Ecological Farming Conference, Asilomar, Pacific Grove, California. Root Values: Connecting Ecology, Community and the Land. www.eco-farm.org

**January 24 - 27** The 27th Annual Guelph Organic Conference, Guelph, Canada, "Building Sustainable Organic Business". Highlighting - 'The Business of Organics' which shows successful Canadian organic businesses and co-ops striving for triple bottom line of economic, social and environmental sustainability. www.guelphorganicconf.ca/

**February 1 - 3** 7th annual Texas Conference On Organic Production Systems - "Nourishing agriCULTURE", College Station, TX. Call (979) 836-3135 for more info. Register before Dec. 31st and save! www.tofga.org

**Feb 2 - 4** PASA's 17th annual Farming for the Future Conference, Penn Stater Conference Center, State College, PA. Visit www.pasafarming.org for more details.

**February 8 - 9** Northern Plains Sustainable Ag 29th Annual Winter Conference, Seven Seas, Mandan, North Dakota. John Doran, Professor Emeritus at the University of Nebraska and Fred L. Kirschenmann, Distinguished Fellow for the Leopold Center for Sustainable Agriculture at Iowa State University will be the keynote speakers. www.npsas.org/

**February 9 - 12** USCC 16th Annual Conference and Exhibition, Oakland, CA. Join us for the Largest Conference & Exhibition in North America for the Composting, Wood Waste, & Organics Recycling Industry. www.compostingcouncil.org/index.cfm

**February 14 - 15** 5th Organic Seed Growers Conference, Salem Conference Center, Salem, Oregon. www.seedalliance.org

**February 16 - 17** 29th Annual OEFFA Conference, Granville, Ohio. Keynote speakers, nearly 50 workshops, locally sourced organic food, kids' conference. www.oeffa.org

**February 18 - 20** 2008 Missouri Small Fruit and Vegetable Conference, Springfield, MO. The Conference brings together small fruit and vegetable growers, researchers, extension workers, and commercial suppliers from across the state and around the country. www.mtngrv.missouristate.edu

**February 21 - 23** Upper Midwest Organic Farming Conference hosted by Midwest Organic and Sustainable Education Service

(MOSES), LaCrosse, WI. 130 exhibitors, over 60 workshops. www.mosesorganic.org/

**February 21** Pre-Conference Organic University, LaCrosse, WI. Features intensive day-long sessions on specific topics in organic agriculture. A majority of Organic University presenters are organic farmers. Spend an entire day exploring topics specific to organic systems. www.mosesorganic.org/

**February 22-26** 2008 IOIA/HOFA Basic Crop Inspection training, HI. See page 3.

**February 24 - 26** California Small Farm Conference, Visalia, CA. "Growing Opportunities" www.californiafarmconference.com

**Feb 29 - March 2** COABC Conference & AGM 2008, Mary Winspear Centre at Sanscha, Sidney, B.C. http://www.certifiedorganic.bc.ca/AGM2008/index.htm

**March 2** IOIA AGM, Guatemala. See page 3.

**March 6 - 8** The 8th ACORN Organic Conference and Trade Show, Memramcook, New Brunswick. www.acornorganic.org/conference.html

**March 25 - 27** 2008 SARE Conference, Kansas City, MO. Join SARE and its many partners to learn the latest about forging an agriculture that is profitable, environmentally sound and good for people and communities. www.sare.org/2008conference

**April 16 - 20** IOIA/IOA Basic Crop Inspection Training, Iowa City IA. See page 3.

**April 21 - 25** IOIA/IOA Basic Livestock Inspection Training. See page 3.

**June 16 - 20** The 16th IFOAM Organic World Congress: Cultivate the Future. Modena, Italy. Go to www.ifoam.org for info.

**Keep IOIA Strong - Lend Your Strength And Get Involved!**



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