

The

# Inspectors' Report

VOL 13 NO 2 SPRING 2004

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## Notes from The Chair

By Brian Magaro

For those of you who were unable to make the AGM in Costa Rica I would like to offer you assurance that you were surely missed, though well represented. The AGM was, without a doubt, a monumental event for IOIA. The meeting was attended by members from 8 countries, which is a IOIA AGM record. The entire meeting was also simultaneously translated into Spanish with the help of Luis Brenes (Board Member from Costa Rica), Gabi Soto (member from Costa Rica) and Ann Baier (Board member from California). Another first for IOIA was to have our secretary, Ann, present a summary of the minutes from the 2003 AGM in Spanish and English. When the Board developed the agenda for the AGM we did not take into account that the meeting would be translated in its entirety. With lively discussions, Luis's interjections of Spanish that left all Latin Americans in laughter and a few pauses to catch our breath the meeting adjourned only 20 minutes over the projected agenda time. The next AGM will be held March 19 / 20, 2005, in Vancouver, British Columbia, Canada.

Many thanks go to those who dedicated many hours of time to the coordination and logistics in Costa Rica for the AGM, 2 Trainings, BOD meetings and the gathering after the meeting. With a special thanks to Luis Brenes.

During the AGM discussion, prior to voting on the Bylaw changes, it became very clear that how Bylaw changes are presented, pre-AGM, does not always give a clear view, to all members, on how proposed change(s) come about, or an explanation of what the impact will be. Many members attending the AGM indicated that they came to the AGM prepared to vote one way and after the discussions changed the way they voted. The Board meeting following the AGM held a place on the agenda to review the current procedure for Bylaw changes/voting. The board has decided that Bylaw changes will be submitted to the membership prior to the AGM, discussed at the AGM by attending members, minutes from that discussion will be circulated to all members after the AGM along with a mail-in ballot for voting on the Bylaw changes. The [See **Notes**, page 20]

## On The NOP Guidance and Directive Documents

Tremendous uproar ensued in the organic community following the April 13 release of three Guidance Statements and a Compliance and Enforcement Directive by the US National Organic Program (NOP). Significant negative press followed the NOSB meeting. Public outcry, intense political pressure, massive media coverage (some of it exaggerated and some simply inaccurate) got results. On May 26, Secretary of Agriculture Ann Veneman, announced at the end of a routine tele-news conference that she would direct the AMS to rescind all of the directives, **"There has been a tremendous amount of interest in this, of concern about what it does. I think that it's important to recognize they were acting in good faith trying to clarify some of the issues that were coming out of the actual implementation....But because there is so much concern about it, I have directed the Agriculture Marketing Service to withdraw the Statement of Clarification and now to work with the National Organic Advisory Board and the industry to determine the best solutions to the issues that have been raised."** Many players in the organic community declared 'victory'. A day later, the four 'directives' disappeared from the NOP website. The previously posted May 2002 'Scope' Guidance Document is also gone. But **what really changed?...**

The IOIA office called the NOP office on May 28 to ask what really happened and what really changed. For example, which "Scope" policy is now in effect, the old one or the new one or neither? Joan Shaffer, Public Affairs Specialist and official USDA spokesperson, summed it up for USDA - **"Nothing changed"**. No rules changed with the posting of the guidance/directives and none changed with the rescinding. That's clear. And inconsistency between certifying agencies will likely continue. What the organic community is hopeful *did* change is that Secretary Veneman's directive to the NOP will encourage them to work more closely with the NOSB in a public-private partnership. **Miles McEvoy, of WSDA's Organic Program, said "I hope this leads to more consultation and better communications between the USDA and the NOSB, certifiers, state agencies, and the organic trade in general."**

NOP staff announced in Chicago on Day 1 of the recent NOSB meeting that the four Guidance Statements were Directives with the full force of law, mandatory for accredited certifiers, and effective immediately. They were presented as clarification of existing law, not as rule changes requiring opportunity for public input. A 30-minute time slot allotted for the NOP's presentation to the NOSB grew to 3 hours as the ramifications became clearer. During Q&A, it became apparent that *all* fishmeal was to be allowed for *all* livestock, no matter whether or not it contained synthetic preservatives.

Richard Mathews, in response to a query about what if fishmeal contained a synthetic substance, said, "it doesn't matter". What was presented in good faith by the NOP as their best legal interpretation of what the rules say met with escalating challenge and opposition. The organic community's frustration was evident during the public comment session which was largely negative, directed at the NOP, and [See **Guidance**, page 10]

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## In Brief...

### Next Accreditation Deadline: October 1

This is your last opportunity to apply in time to be listed in the 2005 IOIA Membership Directory as an Accredited member. Accreditation is available in 3 categories (Crops, Livestock, and Processing) to Inspector Members of IOIA with at least 2 years of inspection experience. Contact IOIA for application forms. Also, see the IOIA website for the Accreditation Program.

### Financial Note for IOIA members

International members without US currency accounts are encouraged to use credit cards for the greatest simplicity in the transaction (international exchange and ease of transferring funds). All other members --please consider paying all fees with a check or money order, if equally convenient and the amount payable is confirmed. It saves IOIA about 4% on each transaction if you do not use a credit or debit card. Thank you.

### Let It Flow

Thanks to Garry Lean for creating an organizational flow chart for IOIA. You can see it on our website in the Administration section.

### A Great Resource

The Environmental Working Group has an excellent, in-depth database listing U.S. farm subsidies by state, crop and year. Info includes summaries and details, and sorts by a number of parameters. The searchable database also offers analyses of different programs. Highlights include:

Summary, 1995-2002  
Commodity programs  
Conservation programs  
Disaster programs  
Top Recipients in 1995-2002  
Check it out at:  
<http://www.ewg.org/farm/region.php>

### 2004 Directory Update

Please make the following changes to your 2004 Membership Directory. **Any changes are italicized.** Other parts of the addresses remain the same unless noted. Any additions or corrections to information categories other than addresses and contact numbers will be listed in the 2005 Hardcopy Membership Directory or can be viewed on the 2004 Online Directory. *Current as of 05/18/04*

#### ADDRESS CHANGES:

Greg Awai  
Email: [gawai@telus.net](mailto:gawai@telus.net)

Duncan Cox  
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Mutsumi Sakuyoshi  
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6-16 Mitsuzawashimocho, Kanagawa-ku  
Yokohama, Kanagawa, JAPAN  
Home: 81.45.313.1071  
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#### SUPPORTING MEMBERS:

OJAI Organics East, George Kalogridis  
PO Box 2334  
Stuart, FL 34995 UNITED STATES  
Work: 805.646.5759  
Fax: 805.646.3090  
Email: [GeorgeK@ojaiorganics.com](mailto:GeorgeK@ojaiorganics.com)

#### WELCOME RETURNING FORMER MEMBERS (NOT PRINTED IN THE 2004 DIRECTORY)

#### SUPPORTING INDIVIDUAL MEMBERS:

Krista Wanser  
12610 Waverly Rd  
Waverly, NE 68462 UNITED STATES  
Home: 402-786-3766  
Fax: 240-525-8833  
Email: [ipocs@inebraska.com](mailto:ipocs@inebraska.com)  
Languages: English (F)

#### SUPPORTING BUSINESS MEMBERS:

International Certification Services  
301 5th Avenue SE  
Medina, ND 58467 UNITED STATES  
Home: 701.486.3578  
Work: 701.486.3578  
Fax: 701.486.3580  
Email: [info@ics-intl.com](mailto:info@ics-intl.com)  
**\*Missed in 2004 Membership Directory due to IOIA Office Error**

Global Organic Alliance, Inc., Betty Kananan  
P O Box 530  
Bellefontaine, OH 43311 UNITED STATES  
Work: 937.593.1232  
Fax: 937.593.9507  
Email: [kananan@logan.net](mailto:kananan@logan.net)  
**\*Missed in 2004 Membership Directory due to IOIA Office Error**

#### SUPPORTING CERTIFICATION AGENCIES:

ECOCERT International, Renaud Bluzat  
BP47, F-32600 L'isle  
Jourdain, FRANCE  
Work: 49.5522.951161  
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Email: [info@ecocert.de](mailto:info@ecocert.de)

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### IOIA Board of Directors

Brian Magaro.....Chair  
Garry Lean.....Vice Chair  
Jack Reams.....Treasurer  
Ann Baier.....Secretary  
Dag Falck.....Ex. Comm Member-At-Large  
Vacant.....Board Member  
Luis Brenes.....Board Member  
Doug Crabtree.....Alternate  
Ann Lameka.....Alternate  
Karen Troxell.....Alternate

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, [webgal@ioia.net](mailto:webgal@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.  
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## Upcoming Trainings

### Kowloon Tong, Hong Kong

IOIA and Hong Kong Organic Resource Centre will co-sponsor Basic Organic Farm Inspector training and Basic Organic Process Inspector training starting **August 23, 2004**. The trainings will be held at the Department of Biology, Hong Kong Baptist University in Kowloon Tong, Hong Kong. The trainings will be instructed with reference to Hong Kong organic standards that are being developed by the Hong Kong Organic Resource Centre. The Hong Kong Organic Resource Centre was established in 2002 as the first local certification body set up to promote the development of organic farming in Hong Kong. For further information about the training please contact Ms. Sharon Chan at 852-3411-2384 or [sharonc@hkbu.edu.hk](mailto:sharonc@hkbu.edu.hk).

### Kalopa State Park, Hawaii

IOIA and Hawaii Organic Farmers Association ([www.hawaiiorganicfarmers.org](http://www.hawaiiorganicfarmers.org)) will co-sponsor Basic Organic Farm Inspector training followed by Basic Organic Process Inspector training from **October 1 -7, 2004** in Kalopa State Park, Hawaii. Hawaii Organic Farmers Association (HOFA) is a non-profit membership organization that administers organic certification in the State of Hawaii. HOFA promotes organic and sustainable agriculture through research, education, and by providing organic certification services in compliance with USDA National Organic program. Accommodation on site will be 'bunkhouse style'. Please contact Kelly Lange of Hawaii Organic Farmers Association at 808-969-7789 or [hofa@hawaiiorganicfarmers.org](mailto:hofa@hawaiiorganicfarmers.org). Info and application are available on the IOIA website, [www.ioia.net](http://www.ioia.net)

### Lubbock, Texas

IOIA and the Organic Trade Association will cosponsor Advanced Organic Inspector Training (Fiber Processing focus) at Texas Tech University's International Textile Center. This training, the first of its kind, is open both to experienced inspectors and interested persons from the organic industry and will include a tour of a fiber processing facility, field trips to see value-added cotton manufacturing, and an introduction to the new OTA Fiber Council standards. Originally scheduled for April 16-17, this training was postponed until the **fall of 2004** because of low enrollment. If you are interested in this course, please contact the IOIA office or review the detailed General Info about the course at [www.ioia.net](http://www.ioia.net).

### East Coast, US

IOIA and the New Jersey Department of Ag (NJDA) will cosponsor the Basic Farm and Process trainings in New Jersey. Dates are **October 13-16** for Farm training and **October 17-20** for Process. The location is Appel Farm Arts & Music Center, Elmer, NJ, about 45 minutes from Philadelphia Airport and 2.5 hrs from Washington DC. The Advanced Training will be scheduled to follow the New Hope Expo East in DC. Based on overwhelming interest shown by IOIA members, IOIA is developing ISO 9001 Lead Auditor Training to be presented as a 4.5 day course for experienced inspectors, either at this same location or nearby. The Advanced course will be limited to 20 participants and is being scheduled to accommodate attendance at Expo East October 15-17. Info and application will be posted at [www.ioia.net](http://www.ioia.net) as soon as available. Contact the IOIA office for further information.

### North Central Montana

IOIA will sponsor Advanced Organic Inspector Training on **September 23-24** in the Great Falls area with a focus on organic flour milling and grain handling. The training will include hands-on advanced audit trail investigations. Info and application will be posted at [www.ioia.net](http://www.ioia.net) as soon as available.

### New Mexico

IOIA will sponsor Organic Farm and Process Inspector Trainings in New Mexico in **late February 2005**. Info and application will be posted at [www.ioia.net](http://www.ioia.net) as soon as available. Contact the IOIA office for further information.

### Vancouver, British Columbia, Canada

IOIA will sponsor Advanced Organic Inspector Training at the Granville Island Hotel in **mid-March 2005**, in conjunction with the next IOIA Annual Meeting. See 2005 AGM article, page 4.

**Future Trainings:** 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.

The late Andrew Rutherford was a farmer, organic inspector, and organic agriculture researcher from southern Saskatchewan. He served on IOIA's initial steering committee and then several years as a Founding Board Member.

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/Training Manager, 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 November 1. Scholarship recipients are notified by December 15.

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## Of Mangoes and Coconuts: IOIA Adopts Two Bylaws Changes at AGM

by Margaret Scoles, ED

Bylaws discussions are not often known to inspire controversy or excitement. Yet, somehow, IOIA Annual Meeting Bylaws discussions always inspire spirited discussion. Twice in two years, AGM attendees resoundingly defeated proposed bylaws amendments after discussion of the issues, only to find that the measures still passed when the mail ballots were counted. Some members have suggested that voting should only occur after members have opportunity to discuss, flush out pro/con rationale, and provide the membership with more explanatory information to accompany the ballot. The IOIA Board agrees. During the April 15 meeting, the BOD **decided** to not present Bylaws proposals for **vote** at AGMs but that Bylaws votes should be after membership discussion has been noted following the AGM whenever feasible. The IOIA Bylaws still allow for member petition as a mechanism for changing Bylaws at AGMs.

Both Bylaws Amendments presented to the members this year passed. Both were presented by the Bylaws Committee. The Committee was unanimous in their support of both amendments.

Bylaws Amendment Proposal 1 was born when the IOIA Board requested an amendment from the Bylaws Committee that would eliminate Alternates on the BOD. This was based on a desire to better utilize the resources of the membership, as IOIA Alternates rarely have the opportunity to participate. However, the Bylaws Committee disagreed that Alternates should be eliminated and presented an alternate proposal, which would reduce the number of Alternates to 2 and name one as First Alternate and the other as Second Alternate, each with specified roles. The First Alternate would participate fully in all IOIA meetings, thereby increasing their competency to serve when needed, but also with some fiscal impact on the budget. Some members questioned whether this proposal should have reached the membership without commentary from the Board. John Burns commented in regionally appropriate terms, "*So the Board asked for a mango and they got a coconut*". This proposal drew very little support at the AGM but passed overall. The membership supported the BOD in waiting one year to implement the

proposal. There has been some discussion about possibly yet another Bylaws proposal to come, which would again raise the question of eliminating Alternates altogether.

Bylaws Proposal 2 was born with a request from the IOIA Board to the Bylaws Committee to elevate the current IOIA Policy to the status of a Bylaw. It was introduced to the AGM tongue-in-cheek by Bylaws Committee Chair Arthur Harvey, "*This was a case in which the Board asked for a large loaf of bread and they got a small loaf.*" This policy states that BOD members may not hold management staff positions with certification agencies due to conflict of interest concerns. The BOD made their decision based on discussion which included the results of an informal survey of IOIA inspector members who were involved in such positions. The majority of those surveyed felt some restriction was appropriate. The Bylaws Committee declined to present that proposal with the Board's wording but presented instead an alternate one that states, 3.0 The corporate powers, management and control shall be exercised by a Board of Directors consisting of no less than five (5) nor more than (12) members **who are actively inspecting each year**. Voting at the AGM after spirited discussion was more evenly divided but the measure passed when the mail ballots were added in.

In a similar instance last year, a petition brought forth from the members was fervently discussed and voted down by the attending group at the 2003 AGM, but the measure passed when the mail ballots were counted. A similar instance occurred in 2001. While it is not clear whether those voting by mail or voting in-person at the AGM are a better measure of the opinions of the membership or which group is better informed, it is clear that discussion sways the vote.

In the future, IOIA members can expect:

1. Fewer Bylaws proposals decided at the AGM.
2. More limited discussion re: Bylaws at the AGM.
3. More pro/con rationale presented with the ballot.

### ED, from page 5

to see the Fancy Food Show, the Food marketing Institute's Show, or the Produce Expo.

**Expo East, Washington, DC is October 15-17:** IOIA has been offered a complementary booth.

**On-Line Directory:** It works! Check it out if you haven't been there. The IOIA office is automatically notified if you update your info. Phoebe is hard at work entering historical training data to facilitate printing transcripts. She reports that training verification for accreditation applicants is a breeze with the new electronic database. Hard copies were mailed out in late March. If you didn't order a copy, but would like one, the cost is still \$12.50 for IOIA Inspector Members.

### Mark your Calendars for the 2005 IOIA AGM!

The next IOIA AGM is scheduled for the weekend of March 19-20 at the Granville Island Hotel in Vancouver, British Columbia, CANADA on the waterfront, just minutes from downtown Vancouver, and steps from the famous Public Market, live theatres, artists' studios, and a wide variety of restaurants. Granville Island describes itself as 'an island retreat in the heart of the city'. The hotel features a health club with Jacuzzi and sauna, meeting rooms with natural light, rooms with complimentary high-speed internet access, and the Docksides Brewing Company, Restaurant, Pub & Patio. Every lodging room is unique. The location is convenient to a major airport and the US border. The event will be held in conjunction with an Advanced Organic Inspector training. For more info about the location, visit [www.granvilleisland.com](http://www.granvilleisland.com) but please do not contact them for reservations. More details, including the exact dates of the AGM and trainings, will be posted as they are available.

An IOIA Fundraising Auction is being planned for this event. The first IOIA Auction, held in Sonoma, CA in 2002 was a resounding success. Please plan ahead to donate items or purchase them to help defray the costs of the AGM.

### Directory Updates, from page 2

#### WELCOME NEW MEMBERS:

#### INSPECTORS:

Greg Awai (Victoria, BC, CANADA)

Christian Thommen (Limon, COSTA RICA)

#### SUPPORTING INDIVIDUAL MEMBERS:

Marg Dickson (Cameron, ON CANADA)

James Harrison (Ipswich, MA)

Ken Kessler (Pangman, SK CANADA)

René Marín Castillo (Managua, NICARAGUA)

Amanda Pitchford (Brewster, MA)

Herman A. Sanchez (Louisville, KY)

Marie Schädé-Wood (Corpus Christi, TX)

Jim Van Deren (Cloverdale, CA)

Inge Vogelmann (Queen Creek, AZ)

Margaret Yole (Saskatoon, SK CANADA)

Wendy Ziehl (Weyburn, SK CANADA)

#### SUPPORTING BUSINESS MEMBERS:

Priority Seed Production, LLC (Yuma, AZ)

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## Notes from the ED

By Margaret Scoles

**Costa Rica:** What a great place to be for our AGM! I arrived by taxi to Hotel Villa Zurqui one day early to prepare for the training, late evening with my almost zero Spanish. When I was delivered to the hotel lobby, no one spoke English, but I was greeted with a giant vase of Birds of Paradise and calla lilies, plus a blooming orchid. I knew we'd come to a good place. It was wonderful to visit the EcoLOGICA office, meet so many IOIA members for the first time, see old friends, and to have so many spouses and families there as part of the IOIA family. I celebrated my birthday the day after the AGM and was serenaded in 2 languages several times. A real highlight of the trip was an invite to Gabi Soto's family compound that day to celebrate our birthdays jointly. Her brother-in-law, Philip Hale, gave us a complete tour of the gardens and coffee plants, ending by flashlight. I especially enjoyed Anna (baby daughter of Bobby and Paola) and meeting Luis's family. Great dance after the AGM! It was good to have new members join during the event (welcome Rene Marin and Christian Thommen) and to have former members rejoin. Many thanks to EcoLOGICA and to Luis for their support on-site.

**Next AGMs:** Many members have requested a set date for our AGMs so they can plan in advance. The next meeting date is the weekend of March 19 or 20 in Vancouver. The 3rd week of March might not be set in stone forever, but so far it was the preferred date of the membership. We will be in the US in 2006 and probably 2007, so it will likely be 2008 before we return to Latin America. Will it be Guatemala, Mexico, Colombia, or Argentina?

**All Things Organic, NOSB, Chicago:** Brian Magaro and I attended Chicago events on behalf of IOIA. The **IOIA booth** (compliments of OTA) was staffed by many IOIA volunteers, including George Danner, Janine Gibson, and Helene Bouvier. IOIA members opted to attend the OTA Welcome Party at the Nature Museum with organic dinner and blues music rather than having an actual inspectors' gathering. **Drew Stuckey won a mountain bike in a drawing of those who'd recruited an OTA Member over the past year.** Day 1 in Chicago (April 30) was the final day of the **NOSB meeting** (see article page 1). I sat through 4 hours of remarkably similar public input. Notable were the frustrated aquaculture producers, who had geared up under the prior Scope Policy, and found themselves uncertifiable and without standards

according to the April 13 Directive regarding scope. They pled with the NOSB for standards as soon as possible. Earlier in the NOSB meeting, the board had approved Hydrochloric acid for delinting cottonseed and Moxidecton for internal parasites (same restrictions apply as for Ivermectin). During the afternoon, I attended the **"Compliance and Enforcement for the NOP" training**, presented by the USDA Compliance division. About 75 people attended. USDA Presenters were Neil Blevins, Associate Deputy Administrator for Compliance, Safety, and Security; Bill Bent (some may remember him as an attendee at our Wisconsin training in 2002), and Eileen Broomell. They explained the procedures for complaints, non-compliances, suspensions, revocations, and appeals. They spoke well. Some of what they said was unpopular. For example, we learned that even if a complaint reached them and was warranted, it still might not be litigated if it was not deemed 'a good use of our scarce resources'. There was grumbling throughout the room when it was pointed out that dated receipts are required by the rule as part of all non-compliance enforcement. We learned that only the person who incurred the action may appeal. A certification agency cannot appeal on behalf of an operator. The operator must initiate the appeal. Bill Bent urged certifiers not to let operators halt an adverse action by surrendering their certification. He pointed out that "we usually say Quitters don't win but with the NOP, Quitters *do* win" if certifiers drop the action against them. As of Monday, May 3, all NOP appeals were to go to their office. They promised that all complaints and compliance actions would be acknowledged within 2 days of receipt and processed efficiently. The training included many helpful sample letters. The general sense of the audience was relief that the Compliance Division seemed to talk straight, mean business, and to take questions without ducking. Day 2 (May 1) was the National Association of State Organic Programs (**NASOP meeting**). I was delighted to be asked to present "What Inspectors Want to Tell Certifiers" for this meeting. This ended up being a workshop with good dialogue among the group. Most notable among the topics discussed was the strong sentiment expressed by most certifiers (including Ray Green of the California State Organic Program) that inspectors should avoid using the term 'non-compliance' altogether. Most felt that not only should inspectors not try to determine whether something is a major or minor non-compliance, but they should limit their wording to 'issues of concern', period. Ray suggested that the best wording for an inspector to use is "I was unable to determine compliance with" and cite the regulation "205.....whatever". This was not unanimous, however. Miles McEvoy said that WSDA inspectors write citations, which is the opposite end of the spectrum. I was

pleased to find the group very supportive of peer mentoring, apprenticeship, team inspections, witness audits, etc. There are perhaps fewer barriers for staff inspectors to participate in these forms of continuing education than for independent contract inspectors. The NASOP meeting included many IOIA members. I was impressed with the degree of support and involvement in IOIA from state programs. In fact, when the election was over, 3 of the 4 members of the NASOP Executive turned out to be IOIA Members: **Doug Crabtree** of MT Dept of Ag (President), **Sue Baird** of MO Dept of Ag (Vice-President), and **Margaret Misner** of ID Dept of Ag (Treasurer). I ducked out of this meeting to attend the OTA Organic Certifiers Council (**OCC meeting**). The primary focus of this meeting was to follow up with the NOP Issues Consensus Project and to discuss whether to disband as OCC and disconnect from OTA to reorganize as a new Accredited Certifiers Association. The group voted affirmative to disband and reorganize and followed up after the meeting with a mail ballot. IOIA is not yet sure what our position will be with the new ACA. We were an associate (non-voting) member of the OCC. There are no plans yet for different categories of membership with ACA. However, I was pleased to endorse the initiative of the ACA in spirit. John Cleary of Vermont Organic Farmers offered to be the receiving address for the new organization and clarified for everyone, "This is **not** a splinter group of disgruntled certifiers or OTA Members". Those attending generally spoke positively to continuing to support OTA through membership and also to the need for ACA support staff. The day ended with the **OTA Annual Meeting**. Re-elected Board members were Marty Mesh, Mary Mulry, and Theresa Marquez. The Trade Show began on Day 3 (May 2). It was a challenge to adequately visit the 800+ booths, stop to thank our food donors and say hello to old friends and IOIA members, recruit new supporting members, and pick up educational literature. It would have been impossible without help with the IOIA booth. Our booth ended up across the aisle from that of a Ugandan group, some of whom I'd initiated a conversation with in Washington DC last fall. They are interested in developing an inspector training. Strong interest was expressed for international inspector trainings from Morocco, Colombia, and Venezuela. It was especially nice to recover one 'lost' IOIA member from Canada; we stumbled across each other on the trade show floor. Brian and I attended the Quality Assurance Council (**QAC meeting**). I was filling in as a non-voting contributor for the Inspection Subcommittee since Arthur Harvey, Chair, could not attend. The group discussed the OTA Retail and Distributor Guidelines, which are nearly finalized. Kelly Shea, Chair of the Livestock Subcommittee mentioned the need for standards for pet foods and aquaculture and anticipated task forces to work on those issues. The Day ended with the Welcome Party. Day 4 for me was Day 2 of the Trade Show. Jim Riddle and I co-presented **"Inspection and Certification 101"** for OTA. There were 4 shows happening at once at the gigantic Convention Center but I didn't get a chance [see ED, page 4]

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## CERTIFIER NEWS

### NSF Int'l Acquires QAI

NSF International (NSF), an independent, non-profit public health and safety risk management solution company, recently announced the acquisition of Quality Assurance International, Inc. (QAI). In the upcoming months, QAI and NSF will work together to provide independent, third-party certification programs and quality services that help protect the safety of food and consumer products. QAI, founded in San Diego, California in 1989, has focused its efforts on providing quality organic certification services at every step in the organic production chain and educating the organic community and consumers. According to recent market surveys, two out of three certified organic products on U.S. store shelves use QAI certification services. The acquisition by NSF advances QAI's strategic plans and expands capabilities while complementing NSF's ongoing mission as a world leader in standards development, product certification, education and risk management solutions for public health and safety.

"Based on the combined efforts of QAI and NSF, we will expand our certification, food safety, auditing and organic certification services," said Kevan P. Lawlor, NSF president and CEO.

### QAI and NSF Announce New Appointments

The new QAI appointments include **Kristen L. Reimink** as president, **David Abney** as director of certification services and **John Foster** as director of technical services.

These three new senior staff appointments in management, certification and technical review complement existing staff expertise while continuing the next steps of the QAI acquisition by NSF International.

While serving as president of QAI, Ms. Reimink will continue in her current post as senior vice president and chief financial officer (CFO) at NSF. David Abney moves over to QAI after playing a key role as NSF business unit manager for retail food safety. Abney recently relocated to QAI headquarters in San Diego to serve in his new role as director of

certification services. As director, he will oversee the organic certification operation in addition to developing and implementing certification policies. Over the last five years with NSF, Abney assisted in development and implementation of NSF's Retail Food Safety Programs. During this time he served as manager of food safety auditors and operations manager of food safety, gaining extensive experience in operations management and program development. Before joining NSF, Abney spent more than 12 years working in the foodservice regulatory community. Most recently Abney served as an environmental health specialist for Plano Environmental Health Department in Plano, TX where he was in charge of conducting foodservice management classes, performing HACCP evaluations and auditing retail food establishments to ensure compliance to the FDA and local food code. **John Foster**, QAI director of technical services, will oversee QAI's technical operations. Foster will be in charge of streamlining QAI's technical review department to further QAI's mission of delivering unparalleled expertise to clients and the organic industry. He has over 15 years experience in the organic community and industry, focusing on the inspection and certification of organic farms, ranches, distributors, traders, processors, retailers, and personal care product manufacturers. He is also a former consulting specialist in organic certification systems and regulatory alignment under the NOP, assisting businesses with organic certification, pre-inspecting consulting, product development, and specialty product marketing.

### New IFOAM ED

Zadok S. Lempett of Switzerland has been named the new executive director of IFOAM.

### ICS Announces Organic Textile Certification Service

Brent Schulz, Business Development Representative for International Certification Services, Inc. (ICS) announced in April the company's launch of a new organic textile certification service.

"We are very excited about this new service, which is unique and much needed in the industry. To our knowledge, ICS is the only U.S. based

certifier to offer a comprehensive organic textile certification," said Schulz.

The certification will be offered under ICS' voluntary, international marketing label program, Farm Verified Organic. All requirements are compliant with existing USDA's NOP standards.

"This program will allow for certification of a "made with organic" or "organic" product, both of which could earn the voluntary FVO seal," added Schulz.

Requirements have been carefully structured to allow ICS to ensure that operators meet organic production principles, while being flexible enough to allow ICS to treat each operation as an individual and fairly assess the realities and practical challenges they face to produce organic textiles.

The program is geared toward international acceptance, based on International Federation of Organic Agriculture Movements (IFOAM) norms and guidance from NOP.

### OTA's OCC Dissolves; Certifiers Form New Association

An independent organization, the Accredited Certifiers Association (ACA), has formed to provide a forum for certifying agents, following the dissolution of the Organic Certifiers Council. John Cleary of VOF and Leslie Zuck are serving as co-chairs for the new ACA.

### USDA Agencies Plan Survey of Certified Organic Handlers in 2005

USDA's Economic Research Service and Risk Management Agency in 2005 will conduct a nationwide survey of certified organic handlers, developed in consultation with industry stakeholders. The survey will gather basic information about handlers as well as risk-management strategies. If you have questions or want to help in developing the survey, contact [cdimitri@ers.usda.gov](mailto:cdimitri@ers.usda.gov), [cgreene@ers.usda.gov](mailto:cgreene@ers.usda.gov), or [loberholtzer@ers.usda.gov](mailto:loberholtzer@ers.usda.gov).

### Latest from MICI – Country Hen

Earlier this year, the Farmer's Legal Action Group filed an appeal on behalf of Massachusetts Independent Certification, Inc. (MICI), USDA challenging the USDA Administrator's authority to compel a certifying agent to issue an organic certificate, and alleging that the Administrator's decision was an arbitrary and capricious reading of the regulations requiring that organic livestock be provided access to the [see MICI, page 20]

## SECTOR NEWS

### Coalition Urges US Congress to Restore Implementation Date for Mandatory Country-of-Origin Labeling

More than 130 producer and consumer groups have signed onto a letter urging members of the U.S. House of Representatives to support and co-sponsor legislation that would reinstate the September 30, 2004, implementation date for mandatory country-of-origin labeling (COOL), as set by the 2002 Farm Bill. The April 8 letter, available from the National Farmers Union (<http://www.nfu.org/newsroom>), urges passage of the Bono-Hooley COOL Enhancement Act (H.R. 3993) introduced by Reps. Mary Bono (R-CA) and Darlene Hooley (D-OR). The bill would reverse a 2-year delay mandated in the omnibus 2004 spending bill passed last February, for labeling fruits, vegetables, peanuts, and red meat (only fish were exempted in the delay). Also, the letter stated, it would "ease the recordkeeping and fine burden on retailers and allows for the labeling program to work simultaneously with a national animal identification program once such a program is operational."

COOL has divided the cattle and hog industries, by regional and other interests, and is opposed by the Bush Administration and many large food processors and distributors who view mandatory labels as costly and cumbersome, impeding foreign trade, and doing little to improve food safety.

Proponents among farm groups and consumer advocates believe labeling would provide a marketing advantage for independent farmers and ranchers, and help purchasers make informed choices regarding food safety and quality. "Polls have shown overwhelming consumer support for origin labeling," according to a New York Times editorial (Jan. 23) that urges labeling as "[an] important step, at minimal cost, in helping to educate Americans about their food supply."

### New Threats Renew Calls for Independent Food Safety Agency, Overhaul of U.S. Laws

The potential for spread of mad cow disease and terrorist attacks on the food supply reaffirms the need to overhaul federal food safety laws and create a single, independent food safety agency, congressional auditors said reported on March 30. Although the food supply is "generally safe," the current "patchwork structure" of 30 federal laws, enforced by the Food and Drug Administration, USDA, and 10 other federal agencies, isn't fully up

to the job of protecting against the new threats, Lawrence Dyckman of the non-partisan General Accounting Office (GAO) told a Senate hearing. Some lawmakers, and many consumer and public interest groups, believe that a single food agency would have sharply expanded testing for bovine spongiform encephalopathy (BSE) commonly known as mad cow disease, after the first U.S. case was discovered last December, according to a March 22 article in *Chemical & Engineering News* that reviews problems with federal food safety oversight. Senator Richard Durbin and Rep. Rosa DeLauro plan to reintroduce bills, which they sponsored in the last two Congresses, to create an independent agency, the article said. "Federal Food Safety and Security System: Fundamental Restructuring Is Needed to Address Fragmentation and Overlap" (#GAO-04-588T) is online at <http://www.gao.gov>.

### Creekstone Farms to Challenge USDA's Decision to Decline Private BSE Testing

Creekstone Farms announced in early April that they will aggressively challenge USDA's decision not to allow them to voluntarily test all of the cattle they process for BSE. Creekstone Farms submitted to USDA their request to conduct private testing at their Arkansas City, Kansas processing plant on February 19, 2004.

Questioned as to whether or not Creekstone will pursue legal challenges to the USDA's decision, C.E.O. John Stewart said his company is considering numerous options in and has not ruled out potential legal action.

"We firmly disagree with the USDA," Stewart said. "The Japanese government, as well as Japanese consumers, are standing firm in that they want all beef imported from the United States to be tested for BSE. The USDA's stance now gives us direction to pursue a path that proves they are wrong with their efforts to continue negotiating a BSE surveillance program that does not meet our customer's requirements."

Creekstone Farms says they have growing congressional, senatorial, scientific, customer and consumer support to conduct private BSE testing of the Black Angus cattle which they market to foodservice, retail and, until December of 2003, to an expanding international customer base. Stewart said he has heard from hundreds of US and international consumers, business customers and even cattle producers who are in support of Creekstone's desire to test for BSE.

On March 15, Agriculture Secretary Ann M. Veneman announced details for an expanded surveillance effort for BSE.

"We are committed to ensuring that a robust U.S. surveillance program continues in this country," said Veneman. On Dec. 30, Veneman announced that an international

scientific review panel would review the U.S. Department of Agriculture's investigation into the BSE find in Washington State and provide recommendations for future actions. In March, this panel, operating as a subcommittee of the Secretary's Advisory Committee on Foreign Animal and Poultry Diseases, recommended a one-year enhanced surveillance program targeting cattle from the populations considered at highest risk for the disease, as well as a random sampling of animals from the aged cattle population.

USDA's BSE surveillance program historically has been focused on the cattle populations where it is most likely to be found, including those condemned at slaughter because of signs of central nervous system disorders, non-ambulatory cattle and those that die on farms. In FY 2004, USDA sampled 20,543 animals—a sample size designed to detect the disease if it occurred in one animal per million adult cattle with a 95% confidence level, which is 47 times the international standard for low-risk countries.

USDA is also working to approve rapid tests for use in the testing program. USDA will help defray costs incurred by industries participating in the surveillance program for such items as transportation, disposal and storage, and carcasses being tested.

[http://www.creekstonefarmspremiumbeef.com/csf\\_response.html](http://www.creekstonefarmspremiumbeef.com/csf_response.html)

<http://www.usda.gov/BSE/>

### More Mad Cow News

The USDA is terrified of finding additional cases of mad cow disease. Their position is essentially 'don't look, don't find.' Creekstone is breaking ranks under the economic pressure of the international beef boycott. Hopefully other companies will buck USDA and NCBA/AMI and test for mad cow on their own. US consumers deserve the same mad cow safety programs as those in Europe and Japan.

However, any private testing regime must use the most sensitive tests and publicly report any mad cows discovered to have credibility. The two Canadian and US mad cows are the tip of an iceberg whose size is unknown. We need the testing of millions of cattle to get a clearer picture of mad cow disease in North America. *From: John Stauber, author of Mad Cow USA,, on the TSE Group listgroup*

### CA Bill Drops Organic Personal Care Language – for Now

Gay Timmons, chair of the California Organic Products Advisory Committee, reports that AB1335 is now a tele-communications bill, and that all language pertaining to agriculture and the deletion of existing COPA "organic cosmetic" definitions have been removed. She expects that the cosmetics giants (Proctor & Gamble, Unilever) have not given up completely, but for the moment there is still a law in California that protects the use of the word 'organic' with regards to personal care and cosmetic products.

## Regional Training News

By Lisa Pierce

I am looking forward to hosting Margaret Scoles as Training Manager, at my home office on Denman Island, BC, Canada for a week a June. This promises to be an intense and productive week as part of our ongoing efforts to coordinate administration of trainings and develop consistent procedures. One of the tangible outcomes of this process will be the reworking of current Training Coordinator manual and development of CD with sample forms and documents. I hope to have this project completed by the end of the summer.

There has been a notable shift in the delivery of IOIA trainings as training coordinators seek to develop new activities to engage and motivate learners. Some of the interactive activities and group exercises that have been developed include: case studies, label exercises, virtual inspections, role-playing scenarios, activity stations, definition word games, and exercises to determine the identity and status of material inputs. I challenge all inspectors to create a new learning exercise that could be used in future trainings. Contest details and prizes to be announced in our next newsletter.

Upcoming Regional trainings scheduled for 2004 are listed on page 3.

Potential training to be held in Taiwan in August 2004 and initial discussions have been held on future trainings in Peru and Uganda.

### NOP Budget

The total budget of the National Organics Program is \$1,443,000.

USDA, AMS Overhead:.....\$180,756.

Salaries and benefits:.....\$741,846.

NOSB (travel, printing, meeting room, phone):.....\$90,000.

Other (travel, staff travel, parcel post, rent, contracts, communications, utilities, printing, supplies, equipment, contracts (TAP reviews, compliance):  
.....\$430,400.

## MEMBER PROFILE

### Fred Ehlert

Fred has been an organic inspector for 9 years. He was an ornamental horticulture major at Cabrillo College and worked for the college after his graduation. He was in business for awhile with fellow inspector John Foster as a Professional Crop Advisor, doing greenhouse pest management work. Ehlert and Foster both worked for CCOF during the same time frame of 1992-93. After leaving California for Colorado, Fred finally landed in Minneapolis, Minnesota and continued performing organic inspections for QAI, OCIA, FVO, OGBA and Oregon Tilth. He then got the opportunity to represent QAI in the Midwest, and he is now their point person for that region. He does some inspections, but mostly he is the Midwest QAI contact, attending trade shows, and fielding questions from clients and potential clients. He also worked with Tomas Nimmo of Ontario Canada, who, until recently, was the QAI Canadian contact. Along his travels Fred became interested in organic textiles, in part because he looked at the

Big Picture of Organics and saw that this had a strong potential to be the next logical flush of growth for the sector. His initial education in textiles was a crash course/workshop at North Carolina State University. Although he has a strong interest in textiles, Fred was not involved in the development of the OTA Textile Standards.

Fred's outlook on the NOP is that it has brought a huge improvement in business from the inspector point of view, but has brought with it unexpected new shades of gray. He sees accreditation as a major challenge for the USDA and has specific concerns about adequate oversight by the NOP of inexperienced certifiers. His view is that overseas confidence in the NOP is essential and that program credibility must be maintained if the global organic market is to remain viable and growing.

Fred's personal statement from the IOIA Membership Directory sums up his view of Organics - "The most important commodity of the organic industry is its integrity."



### Inquiring Minds Want to Know:

#### Organic and Natural Product Companies Associated with Monsanto

<http://www.organicconsumers.org/monlink.html> (source of quote below)

- Brand Name(s): Arrowhead Mills, Bearitos, Breadshop, Celestial Seasonings, Earth's Best Baby Food, Garden of Eatin, Health Valley, Imagine Foods, Terra Chips, Westbrae, Millina's, Mountain Sun, Shari Ann's, Walnut Acres - Owned By: Hain Food Group. Principal Stockholders: Bank of America, Entergy Nuclear, ExxonMobil, H.J. Heinz, Lockheed Martin, Merck, Monsanto, Pfizer, Philip Morris, Wal-Mart, Waste Management Inc. Significantly Owned By: Citigroup

- Brand Name(s): Cascadian Farms, Muir Glen Owned By: Small Planet Foods Principal Stockholders: General Mills Significantly Owned By: Alcoa, Chevron, Disney, Dupont, ExxonMobil, General Electric, McDonalds, Monsanto, Nike, PepsiCo, Pfizer, Philip Morris, Starbucks, Target, Texas Instruments.



## Canadian Standard and Regulation Update

By Stephanie Wells, Organic Trade Association

The Canadian General Standards Board was expected to release the revised **National Organic Standard** for comment and ballot in late May. Based on the principles of the first standard, the new version is less detailed, making it applicable in all farming regions of Canada and a more practical working document for equivalency negotiations with other countries. The earlier version will be kept as a detailed guidance document.

The proposed regulation the Organic Regulatory Committee (ORC, an ad hoc organic sector committee formed 18 months ago to work with government on regulation) has developed with Agriculture & Agri-Foods Canada (AAFC) and the Canadian Food Inspection Agency (CFIA) will include:

- the revised Canadian Organic Standard
- the Guidance Document
- the Permitted Substances List

National public consultation sessions on organic regulation ended in April. Public opinion is that regulation is necessary. Across Canada, the main concerns are the direct and indirect costs of regulation for farmers and processors and, very importantly, how to allow small producers to be certified organic at minimal costs. On the first point, we need details worked out before anyone can project costs. On the latter, it seems that most people prefer ensuring affordable organic certification to an exemption from certification for farmers earning less than some prescribed amount on sales of organic products.

The first submission of the Regulatory Proposal Assessment (RPA) was presented April 29<sup>th</sup> to the CFIA, which will be the competent authority managing the proposed regulation. This submission laid out the argument for the need to regulate, as well as evidence that government and the organic sector, as represented by the Organic Regulatory Committee, followed a widely publicized and consultative process. Now the CFIA has expressed strong support to proceed to the next step of costing options for various scenarios of the proposed regulation.

The lead organic contact at the Canadian Food Inspection Agency was supposed to have met with agency top brass about the next step toward regulation on May 21, but the meeting was cancelled. In addition, a federal election was called that same weekend (for June 28), so this issue has been upstaged for the time being.

## NOSB Recommendations On Petitioned Substances Considered at the April 28-30, 2004 NOSB Meeting

*[No recommended materials can be used until published in the Federal Register by USDA]*

PETITIONED SUBSTANCE	USE	NOSB RECOMMENDATION
HYDROGEN CHLORIDE	<u>Handling:</u> Cotton Seed Delinting	Approved, for de-linting cotton seed for planting.
SOY PROTEIN ISOLATE	<u>Crop Production:</u> Fertilizer	Deferred for more info.
<u>6-BENZYLADENINE</u>	<u>Crop Production:</u> Active Ingredient in Promalin and Accel as Crop Production Aid (thinning apples).	No
UREA	<u>Crop Production:</u> Pesticide for Olive and Fruit Crops (attractant in pheromone traps).	No action taken (not approved by EPA for this use)
<u>PROTEINATED CHELATES</u>	<u>Livestock:</u> As a feed additive	Deferred for more info
MOXIDECTIN	<u>Livestock Production:</u> As medicinal livestock treatment, as a topically applied broad spectrum parasiticide for internal parasites. Same annotation applies as for Ivermectin.	Approved
<u>NITROUS OXIDE</u>	<u>Processing:</u> As a whipping propellant in products labeled as "organic" and "made w/organic."	No
(TSP) TETRASODIUM PYROPHOSPHATE	<u>Handling:</u> As a processing aid in meat analog products.	10 Approved -3 No

**Marty Mesh**, speaking on behalf of Texas Organic Cotton Marketing Coop (TOCMC) to the NOSB at their May meeting:

*"First of all, there is no commercially-available organic cotton seed; second, there is not any commercially-available non-organic cotton seed that is not acid-delinted; third, planting un-de-linted or fuzzy seed is not an option with mechanized planting; and fourth, there are no commercially-available alternative processes for de-linting the seed or otherwise making the fuzzy seed suitable for planting."* **The NOSB decided it was a processing aid rather than a seed treatment and recommended for approval.**

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## Guidance, from page 1

focused on the Guidance/Directive Statements. Many commenters felt they were not clarifications of existing regulations but new policy. Urvasi Rangan, environmental health scientist for Consumers Union, (the publisher of Consumer Reports Magazine), expressed a common if not pervasive consternation, "Some of these come with significant changes to the regulations and to the law. This is a public program. That process that needs to be in place is that these things need to be proposed in regulations for public comment. It's really difficult when we have clarification statements that are also subject to change at any time without public comment. This is not what guidance needs to be, this isn't how this program needs to be run."

The NOSB expressed its concern by concluding its 3-day meeting with the following statement; **"The NOSB expresses its strong opposition to and concern with the National Organic Programs' issuance of significant policy directive without consultation with or advance notice to the NOSB"**. NOSB's mandate in OFPA is *'to assist in the development of standards for substances to be used in organic production and advise the Secretary...'*. Several commenters spoke to their concerns about the NOP's process and the apparent circumvention of the NOSB with these directives, which were posted without any consultation with them. Liana Hoodes, with the National Campaign for Sustainable Agriculture's Organic Committee, said, "We, as National Campaign Organic Committee, continue to object to the treatment of this OFPA-mandated board by the Department. We specifically refer to the NOP's refusal to move the recommendations of the board through a regulatory process and their increasing usurpation of the statutorily-defined role of the NOSB." Consultation with the NOSB might not have created different results. But the community was solid in one position--whether or not the NOP is required to consult the NOSB on their rule clarifications, the community and the NOSB wants them to do so.

The NOP's response to why public and NOSB input wasn't sought on the

Guidance/Directives? Richard Mathews: "What we are finding is inconsistent application across certifying agents... And so what we have done is taken what we know to be inconsistent practices by certifying agents and tried to bring uniformity to these issues." Barbara Robinson: "The reason we don't ask you for public comment -- a better way to think of these directives is: they are the law and the regulations...we strongly believe that if we are about to issue anything, if it can't be anchored directly to the law or the regulations, we shouldn't be saying it."

Much public comment and follow-up press objected to the reversal of the previous scope guidance, which had allowed the certification of aquaculture, pet foods, herbal supplements, and personal care products. Those directly affected by the new Scope guidance spoke of their considerable financial investments, as they had moved forward based on the previous policy. Brian Leahy of CCOF spoke of the impact on a client who produced a peppermint tea with a claim that it "may promote digestion". Aquaculture producers pleaded for standards immediately. Eddy Michael Daniel of OceanBoy Farms in Florida described his company's efforts and investment to produce organic tilapia fishmeal to feed their organic shrimp, only to hear that as of Oct. 21, 2005, they could no longer use the label. His "we just want to know what we are to do" and "can't keep changing the rules while we are doing it" summed up much of the frustration in the room. On the other hand, the NOP reiterated that the NOP could not regulate what is not theirs to regulate. **Barbara Robinson, when queried about personal care products: "USDA is given its authority by the Congress. USDA cannot unilaterally wake up one day and decide that it now has jurisdiction over another agency's regulated entities. Those products that are not covered by OFPA because of Congress are covered by the FDA, and we have no authority to change that, we cannot enforce against products over which we have no jurisdiction. If you have issues with that, you must take it up with the Congress. You cannot ask USDA to do it differently; they have no authority to. It's just a simple fact of government."** NOP staff called the earlier Scope guidance a 'mistake'. This

was in line with a comment from Urvasi Rangan, on Day 1, who commended the new Scope Guidance. "We also want to commend the NOP for prohibiting the use of the USDA label or any NOP approval implications on personal-care products, on dietary supplements, and on aquaculture. We think that consumers are better served by that, for a variety of different reasons, but we commend them for their actions on that." Clearly, that Directive was more consistent with the intent voiced in the preamble than was the May 2002 Scope Guidance.

Significant comment also challenged a perceived 'watering down of the organic standards' and catering to large-scale factory livestock production with the more lenient interpretations of regs on antibiotics in dairy calves and fishmeal as a feed supplement. The apparent allowance of fishmeal without regard for potential contaminants (such as PCBs or mercury), synthetic preservatives (such as ethoxyquin), or what type of animals it was fed to (would a cow choose to eat a fish?) was troubling to many. A few challenged NOP's recent allowance of sodium lactate and potassium lactate (not on the National List) as an antimicrobial for organic Applegate sausage, apparently circumventing the NOSB's responsibility for advising on the List. Other concerns voiced were lack of oversight for foreign ACAs with no on-site visits to date (finally scheduled to begin in June), need for staff for the NOSB, more progress on the Peer Review Panel, more timely additions to the National List as the NOSB recommends materials, and above all, a request for a process that allows for NOSB advisory and public input for all changes.

Antibiotic use in dairy calves was a hot topic. According to Organic Business News, the NOSB Livestock Committee, headed by George Siemon, led the protests. Richard Wood, the Executive Director of Food Animal Concerns Trust (FACT), "opposed the guidance statement's 'cut and paste approach to implementing the Organic Rule'...We believe this revision undermines the integrity of the 'organic' label as meaning 'no antibiotics.'" However, some experienced organic regulators noted later, off the record, that denial of certification for a dairy cow managed organically for 12 months was probably not legally sound. A fairly strong majority of commenters wanted the NOP to go with a stricter interpretation [205.238(c)(1)], not the more lenient [205.236(a)(2)]. Harriet Behar, former IOIA Chair, in her comments called for reopening the rule, if necessary, to clear up the discrepancy in the rules.

Not all input was negative. Dave Engel, Director of MOSA: "We have a lot of pieces out there that we're working with, and sometimes they get kind of messy, they're not really where they should be, they're not working properly, and, as several people have expressed today, when we come to a meeting like this, it's a mess, it seems like, to some of us, but I -- I don't take that view. I think the pieces are very positive. Obviously they are what we have to work with. They are pieces like the NOSB, the national rule, the federal rule, the National Organic Program and their staff, the different certifiers, companies that are petitioning products, the petition process itself, all of these pieces go together, and we are working with them now".

One final result of the Chicago meeting was exactly as expressed by Joan Shaffer. "Nothing changed." Certifiers will resume trying to interpret what the standards say as best they can. Certifiers will be somewhat inconsistent in application. The organic community and the NOP will apparently disagree on what the rules say. Inspectors will need to remain vigilant to report all 'gray areas' carefully and completely. If a dairy heifer calf receives a shot of antibiotic, can she or she become an organic dairy cow? If someone uses a BT product on their cabbage and can't get information from the manufacturer as to what the inert was, are they out of certification for 3 years or must they simply stop using the product? Fortunately, inspectors must only be aware of the results and report them. But the directives remain significant as the NOP's opinion of what would stand in court. If someone labels personal care products as 'organic', the NOP won't act to stop them, because they can't. On the other hand, if manufacturers produce them and label them as certified organic, USDA or otherwise, it isn't clear now what will happen. Who knows what can or can't be certified or labeled organic? When Richard Mathews was asked during the meeting if the deadline of Oct. 21, 2005 could possibly be extended to for label use, he responded, "When it comes to those products that are not covered by OFPA, again those being cosmetics, body-care products, fertilizers, the

answer is no...but when it comes to... aquatic animals and pet foods, the answer is: possibly." And, we can likely expect more emphasis on development of pet foods and aquaculture standards in the near future. Kelly Shea, Horizon Dairy, stated that the OTA Livestock Committee chairs will draft pet food standards in time for the AAFCO meeting in August in Madison, WI. Shea was also the final commenter for public input to the NOSB on April 30. "I really believe in activism and in bringing people together to effect change, but when it's based on untruth, I cannot support it...Untruths are brought up here. And if there is an enemy to the organic industry, it is not from without, it is from within, and I suggest we get ourselves together."

## **Guidance Statements and Directives**

### **What They Are and How They Should be Used**

Guidance statements and Directives issued by the NOP are formal, public responses to common questions directed to the USDA requesting clarification of certain aspects of the National Organic Standards. The NOP develops Guidance Statements through extensive consultation with the USDA Office of General Counsel. Guidance statements represent the USDA's best interpretation of the standards and are indicative of the most likely determination to be reached by administrative law judges when ruling on appeals brought to the NOP involving certifier decisions on the particular issue covered by the Guidance Statement.

### **What They Actually Said**

#### **I. Guidance: National Organic**

##### **Program Scope**

This Guidance Statement clarified the applicability of the NOP to "non-traditional" products in three categories. Products in all categories are currently certified by USDA-accredited certifiers. The previous guidance indicated that any certified product bearing the USDA organic seal had to be produced and handled according to the NOP standards.

1. Non-Agricultural Products: Personal care products; Body care products; Cosmetics; Dietary supplements; Over-the-counter medicines; Health aids; Fertilizers; Soil amendments; Manure. This directive clarified that USDA has no regulatory authority over non-agricultural products; so, their production

and handling may not be certified under the NOP. These products may not display the USDA organic seal. Producers or handlers of these products bearing USDA organic labels would have until October 21, 2005 to use existing packaging and label supplies. These products could display non-NOP organic labels. (For example, California has a state law that regulates organic cosmetics.)

2. Products not covered by the existing standards: Fish; Seafood; Pet foods

The Organic Foods Production Act (OFPA) provides the USDA with the authority to regulate these products; however, current standards do not specifically address them. The USDA, in consultation with the organic industry, intends to develop standards.

3. Products (and production systems) that may need additional standards: Mushrooms; Apiculture (honey); Greenhouses; Hydroponic agriculture. Additional rule making is likely still needed to adequately address these products in the standards. *Note: The EU won't accept NOP certified honey from US.*

#### **II. Guidance: Livestock Health Care and the Origin of Dairy Livestock**

This issue involved how the use of antibiotics impacts the organic status of livestock and products derived from livestock. The standards are ambiguous with regard to dairy animals and milk production. On one hand, section 205.238(c)(1) states that a producer may not "Sell, label, or represent as organic any animal or edible product derived from any animal treated with antibiotics..." On the other hand, 205.236(a)(2) states that "Milk or milk products must be from animals that have been under continuous organic management beginning no later than 1 year prior to the production of the milk or milk products that are to be sold, labeled, or represented as organic..." The NOP, with this guidance statement, chose the more liberal of these two conflicting standards. Much recent press stated erroneously that the NOP decided to allow antibiotics in dairy cows. Instead, it said that the treated animal itself or meat from the treated animal can never be sold, labeled or represented but that milk can be sold, labeled or represented as "organic" after dairy animals are managed organically continuously for 12 months. This guidance indicated anything that happens before the transition period is essentially "erased" with regard to production of organic milk. Not considering milk to be an "edible product derived from the animal" does appear to stretch logic, but it is consistent with the conversion for dairy animals. As long as conversion is allowed, there is no way to [See **Livestock**, page 26]

## Arkansas Farm Training

By Stan Edwards

Fayetteville, Arkansas was host to the Basic Farm and Livestock inspection classes, co-sponsored by NCAT. Of the 19 students attended the basic farm course, four were NCAT/ATTRA employees, and the remaining had a wide

diversity of backgrounds (as usual). Students were plunged into the NOP standards for the first day and a half, in preparation for a field trip to a diversified farm operation just over the border in Oklahoma (turn right at the “coon dog” training camp!). Our third day was somewhat more relaxing as we worked on reinforcing basic concepts, exploring some of the many controversial issues in the NOP and organic certification. Steve Diver, member of the NOSB compost tea task force, gave a comprehensive talk on the benefits, manufacture and certification issues surrounding this valuable farm input. The focus of this group on learning was apparent in the small number of “outrageous statements” made. Never the less, we did have a few good ones, including this winning quote from Marg Dickson (wife of BOD member Garry Lean):

**“I haven’t learned the Vulcan mind meld with my husband Garry...yet.”**

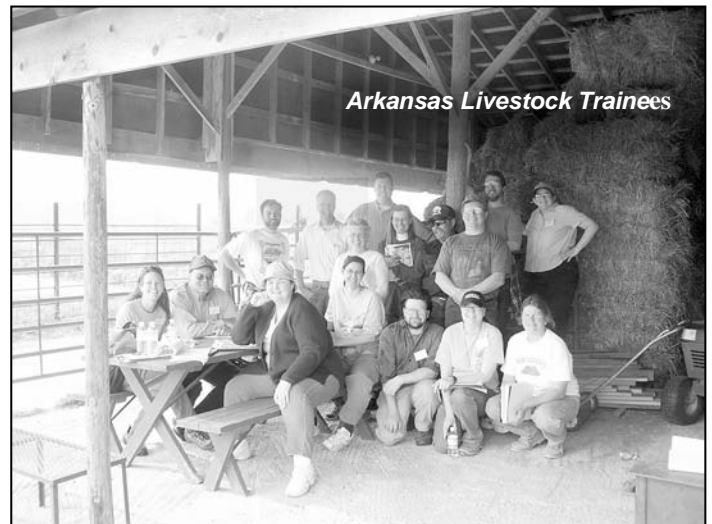


## Arkansas Livestock Training

By Harriet Behar

With spring beauties, tulips, daffodils, crabapples, dogwoods and redbuds in full bloom all around us, the Arkansas livestock training took place at Mt. Sequoyah (outside Fayetteville) Arkansas from April 5-7. Many of the attendees had just completed the farm training (and their farm reports) and had one night free to take a short break before stuffing more organic info into their brains. Due to low class enrollment, Harriet Behar was the only Training Coordinator for the group of 15, when she stated she was an “organic information junkie”, the group thought that now she had become a dealer!

The class started with an overview of the NOP Rule livestock sections, with everyone used to citing the different numbers and referring back to definitions in order to understand the meaning of specific words (such as feed, feed additive and feed supplement). The course then continued with specific overviews of a variety of species including dairy (cow, goat, sheep), beef, swine, fiber bearing animals, and poultry (layers, broilers, turkeys). Many in the group had experience with one or many different species and we all learned from each other. General risk assessment and organic control points, as well as approved materials were also reviewed. The evening of the first day included an optional slide show of beef and poultry slaughtering.



Ann Wells DVM, of ATTRA gave an excellent 2-hour presentation on assessing animal health, which everyone greatly enjoyed and received many accolades in the course evaluations. Our group was lucky to have an IOIA member, and experienced organic inspector Kathy Turner, be the host of our livestock field trip. Kathy and her partner recently purchased a nearby beautiful hilltop farm and many in the group threatened to stay in her idyllic location as squatters. We reviewed her not quite certifiable beef herd that included a new calf on the day of our visit; perhaps Kathy will name it IOIA?

The course also included a variety of exercises including writing checklists with comments, assessing feed rations, livestock investigative skills and what does the USDA rule really say? The group completed a 7 question worksheet on the second evening based on the field trip and then took the exam the following morning. After 7 days together, folks were a little unsure about entering back into the real world, especially after being spoiled by the great food we were served (who is going to make breakfast for us tomorrow?).

Joseph Dietz won the Outrageous Statement Award with his comment... **“I woke up last night with some kind of hot flash.”**

## IOIA/Assiniboine Distance Ed Livestock Training

by Janine Gibson

After two and half months of readings and completing three assignments via distance with the IOIA/Assiniboine Community College Livestock Inspection curriculum, 12 students met from across the Prairies April 30, May 1 and May 2, 2004 in Basswood, Manitoba, Canada. Janine Gibson was the Training Coordinator who warned students to be prepared for wet weather - mercifully the May snowstorm held off until the week after the practicum! The geo-thermally heated Basswood hall kept us warm while in class. A majority of the students were taking the Livestock course without yet taking the IOIA Crops course, so 5 Certificates of Completion were awarded to those with a Crops Certificate and 7 Letters of Attendance will be issued to the others. Once students who successfully completed the Livestock course also successfully complete the Crops course, they will be issued certificates for both. Assiniboine Community College plans to offer the Crops Course next year and offer the Livestock Inspection every few years as needed and approved by IOIA. The Field Tour included the feed, beef, hog and chicken production of the Murry/Proven Farm certified by the Organic Producers Association of Manitoba (OPAM). Once again the Manitoba crocus put on a display by blooming for us, despite the cool temperatures. Students rated the course, the bed and breakfast lodging and local organic meals as excellent, a real taste of the prairies helping with the steep learning curve! PowerPoint presentations in development by the CAPS Subcommittee were well received, despite the fact that unscheduled delays in the new Canadian Organic Standard made referencing an up to date Canadian standard unavailable. Most students plan to work with NOP accredited certifiers so were happy to focus on clarifications to NOP Livestock Inspection issues and information. Many thanks to IOIA, Harriet and Margaret for their great photos covering the diversity in livestock inspection.



Participants Go The Distance in Manitoba

## BC Regional Training

By Lisa Pierce

Basic Organic Farm Inspector training (Feb 24-27, 2004) and Advanced training (March 1-2, 2004) co-sponsored by the Certified Organic Associations of BC (COABC) was held in conjunction with the group's annual general meeting. COABC has developed its own provincial standards and this year, received recognition from USDA National Organic Program to apply NOP technical standards to certify operations that produce or handle agricultural products that will be sold as organic in the US. The USDA recognition followed two years of work by COABC and governmental ministry to develop and implement an ISO 65



BC Training was co-sponsored with COABC

compliant accreditation program. There are a total of 11 local certifying associations accredited by COABC operating in this Canadian province. According to COABC Operation Policies and Procedures, persons contracted by certification bodies, "must be members in good standing of the Independent Organic Inspectors Association (IOIA)."

Trainings referenced both COABC and NOP standards to meet training needs of both new and experienced BC inspectors. Lisa Pierce was the training coordinator for the Basic Crop Inspection course with the assistance of Marina Buchan. A total of 18 participants attended the training. The course was challenging as participants were tested on their knowledge of two different standards as well as significant differences between standards. The intensity of the learning experience was alleviated by good energy and laughter of participants. A trio of wanna-be inspectors who had travelled from the prairies sat at the back of the class and kept us entertained with comments such as, "Can we have one certificate between the three of us back here?" and in reference to the standards, "Oh, are we supposed to read them?" Another participant asked, "do you have to sleep with someone you do not know" – and the memory of the context for that one is long gone...but then one of the sample reports the instructor presented to class reported that the farmer, "plans to produce his own spawn"....

Nine inspectors participated in the IOIA Advanced training. The calibre of experienced inspectors and small group size resulted in success of advanced training as a shared learning experience. The participant driven format consisted of structured discussions based on expertise within the group, participant presentations and input. Lisa Pierce facilitated the Advanced training with the assistance of Sarah Davidson (who with her experience working for certifiers, certification committees and research of differences between NOS and COABC standards, was integral to the success of the course.)

## IOIA in Costa Rica--First Bilingual Advanced Training

by Margaret Scoles, Training Manager

IOIA holds an advanced training in conjunction with every Annual Meeting. This year, 33 attendees from 8 countries (Argentina, Canada, Colombia, Costa Rica, Guatemala, Nicaragua, Peru, USA) attended Advanced Training at Hotel Villa Zurquí in Heredia, on the outskirts of San Jose, Costa Rica on March 11-12 in conjunction with the March 13 IOIA AGM. This sets a new record for the number of countries represented at an IOIA training. Of the 33 attendees, 27 received Certificates of Completion.

The course was originally designed with the intent to keep all participants together in one English-speaking group, separating only for half of one day. The Spanish group would cover Advanced Coffee Audit Trail in Spanish while the English group toured a coffee processing facility in English. As the group size and the need to better accommodate Spanish speakers increased, a decision was made to split the group into two. Fortunately, the number of native Spanish speakers and native English speakers was about equal, so both groups were about 16 participants, an excellent seminar size. This increased the workload for the primary speakers, David Gould and Fred Ehlert, who valiantly went 'above and beyond' to present their materials twice. It also relied heavily on volunteer translation by Gabi Soto and Luis Brenes. The groups joined on Day 1 for Introductions in the morning and "What Certifiers Want" with translation in the afternoon. Day 2 was entirely separate except for the presentation of certificates. Fortunately, the groups were together for meals in the cozy hotel restaurant and some refreshment breaks in the large patio.



**Advanced group tours a parallel production coffee mill**



**The Exceptional David Gould**

David Gould, bilingual organic inspector and consultant, spoke in detail on sanitation topics including boiler additives and chlorine and fielded endless questions from the group. Everyone appreciated his enthusiasm and energy in both Spanish and English. Fred Ehlert presented an outstanding, detailed description of the fiber processing industry in both PowerPoint and supporting handout. This was the first substantive IOIA organic fiber processing session for inspectors. Fred is an experienced inspector, long-time member of IOIA, reviewer for QAI, with a strong interest in organic fiber. He recently attended a weeklong seminar in 'Fiber Fundamentals' at the College of Textiles at NC State University. Hands-on sanitation exercises, with small groups rotating between learning stations were appreciated as an attempt to incorporate more hands-on activity. They drew some grumbles though as some the inspectors found themselves tricked by the intentional snares laid in their way. One station required testing for quaternary ammonia left on a surface, another the testing of chlorine concentrations and the calculation to dilute to the Safe Drinking Water Standard of 4 ppm, and another required pH testing as attendees looked for residue of an acid-based cleaner. The rest of the training agenda was developed with input from registrants. In a pre-training survey, a session on "What Certifiers Want" was the most-requested topic. John Foster gave a humorous presentation including excerpts from actual inspection reports. Many registrants expressed interest in mini-sessions on specialized inspection topics. Bob Howe's mini-session on Inspection of Sea Vegetables and the concept of incorporating attendees as presenters were both resoundingly applauded by the attendees. Carlos Humberto and Guillermo Saborio presented coffee audit trail for

the Spanish group. Both are inspector members of IOIA. In addition, Guillermo is the new Executive Director of Eco-LOGICA. The English group traveled by bus for a field trip tour of Lomas Al Rio, a parallel coffee handling facility. The tour was in Spanish, greatly facilitated by Luis Brenes's superb translation. Because March is off-season for coffee, we were only able to see coffee beans drying on a patio and on the drying beds. The receiving and cleaning lines and the large drying ovens were idle. During this tour of the dry mill, Karen Troxell earned her first Outrageous Statement Award. At the coffee inspection (inside the milling area), the plant manager said about the auger "*tornillo sin fin*", and John Burns translated "*endless screw*", and Karen said "*I need one of those*". To accommodate the group, the manager started up the grading line, which included a gravity table and an electric eye. A high point of the field trip was a stop for breakfast at a local market, with small groups breaking up with a handful of colones and at least one Spanish speaker in each group.



**On the pavement with sun-dried coffee beans in Costa Rica**

In order to keep training fees as low as possible to encourage participation by both North American and Latin American members of IOIA, the IOIA Training Manager, assisted by Chairman of the Board Brian Magaro, served as Training Coordinator. In addition, IOIA allocated \$1000 to the Latin American Committee and the committee chose to spend all of this on subsidies to assist Latin American IOIA members to attend. EcoLOGICA deserves special acknowledgement for their assistance with this event. They arranged buses, translated handouts, delivered sanitation products, and helped with countless other logistical details.

### **BASIC FARM TRAINING IN COSTA RICA**

By Geovanny Delgado & Milena Barrantes, Organizers, Eco-LOGICA March 15 - 18 was the date chosen to celebrate in Costa Rica the IOIA Basic Farm Inspection Training. Being this is the sixth year since 1995 (1995, 1997, 2000, 2001, 2002, 2004), we received 26 people from nine countries. The fact of having people coming from such a diverse origin (Costa Rica, Mexico, Venezuela, USA, Switzerland, Guatemala, Colombia, Ecuador and Brazil), gave this training and extra richness and learning possibility.

The field trips were to Alfredo Ruiz's highland coffee farm and to Hugo Hermellink's unique cacao farm on the Atlantic coast in Limón. We thank the Organic Agriculture Program of the University of Costa Rica for facilitating us the transportation to the field trips.

There was a "social" activity in which we had some funny stories (not all of them to be told). For example, Roger Meneses from Costa Rica delighted us with a mixture of Mexican singing-dancing. Unfortunately, the girls went to bed early and the boys had to dance alone, but we still had a good time. Our TC Lidia Gaivironsky, was invited to dance almost by ALL gentlemen, but she bravely resisted and we were not able to see if Argentinians dance also Salsa and not only Tango.

We hope to organize more trainings in the future as co-sponsors, and sincerely thank IOIA, Luis Brenes and Lidia Gaivironsky for all the support and comprehension during the last-minute-constraints. The training was a success and your help was really valuable.

### **Costa Rica y el AGM de IOIA**

By Lidia A. Gaivironsky, Latin American Committee Chair

Nuevamente, Costa Rica ha sido la sede del AGM de IOIA. Sus espléndidos paisajes y su hospitalaria gente sirvieron como marco para la reunión así como para el desarrollo de un Curso Avanzado y un Curso Básico de Inspección.

Para favorecer la presencia y participación de los inspectores latinoamericanos, Luis Brenes propuso y obtuvo el otorgamiento de becas, que permitieron cubrir, en parte, la participación en el mismo.



Esto permitió que Lidia Giron (de Guatemala), Carlos Escobar (de Colombia), Gerardo Medina (de Perú), Rene Marin (de Nicaragua) y Lidia Gaivironsky (de Argentina) nos reencontráramos, para compartir experiencias y conocimientos. Nuestro agradecimiento a IOIA por esta inestimable oportunidad.

También estuvieron presentes en el Curso Avanzado interesados provenientes de otros países latinoamericanos, así como de Estados Unidos y Canadá, que también aportaron sus vivencias, su camaradería y su buen humor.

Luego del AGM, el Comité Latinoamericano tuvo su reunión, donde se establecieron nuevos lineamientos de acción. Actualmente el Comité se encuentra trabajando en los mismos, a fin de elaborar un documento que se elevará oportunamente al Board.

Como siempre, estos encuentros nos permiten ir mejorándonos día a día, tanto como profesionales como a nivel personal, y reafirmarnos en la ética y la conducta orgánicas.

### **A Learning Experience in More Ways Than One Florida Basic Farm Training** by Jonathan Austin

From January 16 through January 22nd, Quality Certification Services/Florida Organic Growers co-sponsored with IOIA our very first Organic Inspectors Training. As with everything in the organic industry, and life in general for that matter, the most impressive part was the people who were involved. Don't let anyone ever suggest to you that attending, teaching, or arranging such a training is easy. It is hard work involving long hours from everyone involved. I really must commend all of our attendees for their hard work and their patience with all of the goofs and snafus that inevitably occur in executing such a training for the first time. Our learning curve was as steep as theirs. (Note to self: "An overhead transparency projector is useless without a stock of actual overhead transparencies.") The instructors, John Burns and Rick Martinez also did a fantastic job of keeping people attentive and engaged for 12 hours a day, a great testament to John and Rick's knowledge, enthusiasm, and skill. And of course, Margaret and Lisa were our guardian angels, ready with that document that we neglected to ask for, or to steer us in the right direction when we inevitably went astray. To all who were involved, I offer my sincere thanks and admiration.

**Spanish language Basic Farm course participants**



**Advanced OSA winner Karen Troxell, left, with Maria DeVincenzo and Lois Christie**

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# EUREPGAP: European Retailers and Producers Good Agricultural Practices

By Luis Brenes

## Why do we include an article about EUREPGAP in an organic inspector's newsletter?

- Because many certified organic operations that export fresh fruit and vegetables to the EU also are certified or will need to be certified under EUREPGAP protocol
- Although EUREPGAP is a private initiative and it does not constitute an official national or governmental regulation, it has been developed by mutual agreement of the producer and retailer sectors and has become a requirement for the major EU supermarket chains.
- Because EUREPGAP deals with food safety risks at the pre farm gate level. Many of these risks are also shared as organic control points in the risk assessment of an organic farm.
- It is a product / process certification and not a Management System Certification.
- It has an interesting approach towards FARMER GROUP QUALITY MANAGEMENT SYSTEMS, not very different from Organic community grower group's internal control systems but more ISO and QMS oriented.
- Because some organic certifiers accredited under ISO 65 or EN45011 have also included EUREPGAP scope in the offered services.
- Because organic inspectors fulfill most of the requirements to become EUREPGAP field auditor.

The following paragraphs have been textually extracted either from the EUREPGAP website ([www.eurep.org](http://www.eurep.org)) or the website of Food Cert India ([www.foodcertindia.com](http://www.foodcertindia.com))

### Goals:

The EUREPGAP goals are essentially to reduce the risks of food safety lapses in agricultural production and to objectively verify best practices with some reference points so that it is done systematically and consistently throughout the world. It is a product / process certification and not a Management System Certification. Source: [http://www.foodcertindia.com/eu\\_origin.htm](http://www.foodcertindia.com/eu_origin.htm)

### Origin:

Started as an initiative by retailers in 1997, the Euro-Retailer Produce Working Group (EUREP), the current version of the EUREPGAP document and procedures has been agreed among partners from the entire food chain for Fruit and Vegetables after a wide consultation phase.

EUREPGAP members include retailers / suppliers / growers and associate members from the input and service side of Agriculture.

A Technical and Standards Committee (TSC), consisting of grower and retail members, is responsible for the correct and efficient implementation and continuous improvement of

EUREPGAP FOODPLUS GmbH, a non-profit making organization located in Cologne, Germany is the global body for implementation of EUREPGAP activities. source: <http://www.eurep.org/fruit/background.html>

### Development of EUREPGAP Documents:

The first EUREPGAP documents were released in September 2001 The Version 2 (January 2004) of the EUREPGAP Reference Standard Fruit and Vegetables has been unveiled at our fourth Conference "Towards Global Harmonisation 2003" in Madrid on 10-12 September 2003. The EUREPGAP protocol document has been accredited to ISO Guide 65 and it was designed to meet ISO / IEC Guide7. The scheme has been accredited by Dutch Council for Accreditation under European Standard EN 45011. sources: <http://www.eurep.org/fruit/background.html> and <http://www.eurep.org/fruit/background.html>

The Technical and Standards Committee (TSC), has evaluated and approved the new versions of the normative documents for fruit and vegetables - the EUREPGAP General Regulations for Fruit and Vegetables, the Control Points and Compliance Criteria, and the Checklist. These documents constitute the EUREPGAP Version 2.x and are current since 12th September 2003. source: <http://www.eurep.org/fruit/background.html>

### Downloadable documents:

The EUREPGAP normative document consists of:

- the Control Points and Compliance Criteria
- the Checklist
- the General Regulations (process of certification and specific auditor requirements).

Check them in several languages at <http://www.eurep.org/fruit/documents.html>



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**Requirements to be Addressed by the Grower:** Source: [http://www.foodcertindia.com/eu\\_insp.htm](http://www.foodcertindia.com/eu_insp.htm)

The protocol for fresh fruit and vegetables is divided into chapters. Each chapter has major requirements (major musts, all of them have to be fulfilled), minor requirements (minor musts, grower must fulfill no less than 95% of the applicable ones) and recommendations (shoulds)

1	Traceability	9	Harvesting
2	Record Keeping	10	Post Harvesting Treatments
3	Varieties and Root Stocks	11	Waste And Pollution Management, Recycling And Re-Use
4	Site History and Site Management	12	Workers Health, Safety And Welfare
5	Soil And Substrate Management	13	Environmental Issues
6	Fertiliser Use	14	Complaint Form
7	Irrigation	15	Internal Audits
8	Crop Protection	16	Legislation

**Major Musts:** These are the points that have to be achieved, as they are basic requirements for Good Agricultural Practices. In fact many of them are legal requirements. However for specific crops, some musts may not be applicable. Therefore the musts will result either NC or NA.

**Minor Musts:** These are also the points that are to be compiled by the grower. Some minor's may not be applicable for specific crops as in the case of major musts. The minor musts will also result in either NC or NA. However 5% of the applicable minors are permitted and this will not prevent the issue of certificate.

**Shoulds:** The protocol intends to be continuous improving base document Shoulds also will be inspected and results given acts as valuable feedback. However non-compliance of Shoulds does not prevent issue of certificate. These may eventually become as minor or major musts. EUREPGAP Certificate will be issued if there are no open non-conformances under major musts and within 5% limit of minor musts.

**Auditor Requirements:**

Farm auditor and farm inspector are two different categories. Auditor is responsible for final evaluation of compliance of the operation and is the interlocutor with the certification body.

Auditor assesses the Quality Management System as he/she has formal training as Lead Assessor (see next item 2.1.(iii)) as well as GAP and food safety training.

Farm inspector does not have the formal training as Lead Assessor but has GAP and food safety training and can inspect the farm's agricultural practices but not the farm's quality management system. Auditor requirements (as per General Regulations ver 2.1 Jan 04) are:

1 Formal Qualifications:

1.1 Post-high school diploma

(i) A least a post high school diploma or equivalent (minimum course duration of 2 years) must have been obtained in a discipline related to the scope of the certification (Fruit and Vegetables).

2 Technical Skills and Qualifications:

2.1 Lead Assessor training:

(i) Practical auditing experience (minimum 15 days).

(ii) Lead Assessor training course must have a minimum duration of 37 hours, which must be recognised by one of the Accreditation Bodies defined in General Regulations Annex 5, point 5.1.3.

(iii) Lead Assessor training course must cover: applicable standards on Quality Auditing, Auditing Techniques, focus of the audits (Psychological aspects and communication) and reporting, it must also include a practical case study.

2.2 Food Safety and GAP training:

(i) Training in HACCP principles either as part of formal qualifications or by the successful completion of a formal course based on the principles of Codex Alimentarius.

(ii) Food hygiene training either as part of formal qualifications or by the successful completion of a formal course.

(iii) Pesticide and fertiliser training either as part of formal qualifications, or by the successful completion of a formal course.

(iv) A minimum of 2 years post-graduate and 3 years overall experience in the horticulture industry. This shall involve work in the production of horticultural products, or a quality assurance or food safety function within the fruit and vegetable industry.

2.3 Communication Skills

(i) English language skills suitable for negotiations and communication with EUREPGAP bodies.

(ii) "Working language" skills in the corresponding native/working language. This must include the locally used specialist terminology in this working language.

(iii) Exceptions to this rule must be consulted beforehand with the EUREPGAP Secretariat.

**More info?** For more information please check the available folder in pdf format at the EUREP's website:

[http://www.eurep.org/documents/webdocs/EUREPGAP\\_FP\\_Folder\\_ENG\\_Jan04.pdf](http://www.eurep.org/documents/webdocs/EUREPGAP_FP_Folder_ENG_Jan04.pdf)

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## Highlights of Recent Board Meetings

*Please note: Full Minutes are available on the IOIA website in the Members Only section*

### **February 19, 2004:**

The Board approved the membership of the IOIA Finance Committee to consist of: Jack Reams (BOD Treasurer, Chair), Brian Magaro, Garry Lean, Diane Cooner, and Gene Prochaska. Margaret Scoles, ED, serves as ex-officio member on this committee.

In reviewing the budget, The Board noted that when people pay IOIA with a credit card, IOIA pays approximately 3% of the amount charged in bank service charges. If it is equally convenient and the amount to be paid is clear, members are encouraged to pay by check. However, international members are encouraged to use credit cards to maintain the greatest simplicity in the transaction with respect to international exchange and ease of transferring funds.

The Board agreed to present a balanced budget to the membership at the AGM. We approach the AGM prepared to listen to membership priorities, with respect to membership services, dues and training.

IOIA is working toward developing greater consistency in training curricula and delivery, and creating a plan to tailor trainings for an increased breadth of audiences. We understand our investment in developing trainings to be a means for sustaining the ongoing relevance and viability of IOIA. Part of the work associated with upgrading IOIA's training offerings will be to develop clear policies and procedures, and criteria by which to discern how to respond to requests for training.

We recognize the need for marketing tools to communicate the value and benefits of IOIA membership to inspectors. The value of membership is, in part and in turn, a function of certifiers' (and other industry stakeholders') perceptions of the value of hiring IOIA-member (not just IOIA-trained) inspectors. Our plan to upgrade trainings includes continuing education and professional development for current inspectors.

The IOIA website and on-line membership directory will be supported by switching our web host to a new service.

IOIA will have representation at the May NOSB and OTA meetings in Chicago, including Margaret, Brian, John and possibly Dag, with a complimentary booth and OTA Trade Show passes.

The Board approved two new members of the Ethics Committee. Chip Kraynyk and Joe Montecalvo will serve a two-year term ending in January 2006.

The Board and alternate discussed the concept of creating an Advisory Council to facilitate effective communications with Certifiers and other members of the organic sector, and stimulate their understanding of and involvement with IOIA (without changing the identity of IOIA from that of an inspector's association). We seek to learn how IOIA can contribute to producing better inspectors, understand what is meant by "better inspectors" and what might motivate certifiers to hire IOIA member inspectors. This dialog should have direct feedback to the IOIA's Training Committee. The desired outcome of such a free exchange of information will be win-win: IOIA has greater focus for training; certifiers hire better inspectors; organic inspection/training/certification/accreditation professionals come together as equals to work on common problems. The goal is a certification process that is more efficient, transparent and credible. The structure of such a dialog has yet to be determined.

### **March 13-14, 2004**

The Board re-elected all officers such that they remain as currently configured:

Chair, Brian Magaro

Vice-Chair: John Foster

Treasurer: Jack Reams

Secretary: Ann Baier

At-Large Executive Committee Member: Dag Falck

Regular Board members: Luis Brenes and Garry Lean

Board Meetings: The Board discussed ways to increase meeting effectiveness in the coming year, including careful development of meeting agendas, prioritization of issues to those most relevant to governance, strategic development, policy, and clear delegation of tasks. We set times and meeting dates for the coming year: April 15, May 20, June 17, August 19, September 16, October 21, and December 16, 2004; January 21 and February 18, 2005.

Committee Function: The Board will review Committees form and function. We can begin by reviewing the work done to date (Bylaws, Committee on Committees and the IOIA organizational chart). The goal is for IOIA to have clear, consistent policies on Committees: goals, objectives, membership criteria, what constitutes a quorum, rules of order, decision-making process, terms and term limits, and monitoring procedures.

Fundraising: Diane Cooner, chair of the Fundraising Committee provided a thought-provoking report on the fundraising workshop she attended at the Bioneers conference in October. IOIA needs a consistent message and approach; present how the work of IOIA benefits farmers, consumers, the international community, local certification agencies and inspectors. Certification needs may include NOP, EU, IFOAM, Eurogap, ISO, JAS, CAAQ, food safety, bioterrorism, and other standards. Mission should drive our fundraising. Is IOIA's mission statement too broad? Narrow? Do we need a Vision Statement? A Byline?

Priorities based on input form AGM: The framework of future Board meetings will be to design 2004-2005 priorities and goals, work plans and milestones, taking into account the input from the AGM, to keep IOIA relevant, vibrant and sustainable.

### **March 13, 2004 Annual General Meeting, Villa Zurqui, Costa Rica**

2003 Annual Report

Board Chair Brian Magaro highlighted some points from the written Annual Report:

- Last year we had the largest change in the IOIA Board in the history of the organization. The Board that moved on had 29 years plus of experience. The new Board had 5 years of IOIA Board experience at that time. The Board that went out last year was strong; the new Board took their ideas, and has worked hard and built upon the work that had been done.
- Training: 433 people participated in IOIA trainings in 2003. The Board appointed the Curriculum and Program Subcommittee that will review the IOIA curriculum.
- The IOIA website has been updated, including development of a real-time on-line membership directory. Thanks to the IOIA staff!
- Accreditation Committee: The role of this committee is to provide a formalize assessment of the continuing education and experience of inspectors that goes beyond membership in IOIA. The challenge and opportunity before us now with respect to this work is to achieve greater industry recognition of accredited IOIA inspector members.
- The Board acknowledged the staff for their excellent service, and recognized them for going above and beyond their job descriptions.
- Committees have shown a resurgence of activity and responsiveness this year. We acknowledge that all committee members are volunteers, and appreciate their efforts.
- Thank you to the Latin American Committee for their efforts in making this meeting and the diverse presence of participation possible!

**Financial Report:** Treasurer Jack Reams presented the 2003 Financial report and the proposed budget for 2004.

**Committee Reports:**

**Bylaws:** Arthur Harvey reported on the committee drafting new Bylaws proposals. He also suggested applying term limits to committee members.

**Communications:** Bob Howe reported that the searchable membership database was completed this year; a substantive accomplishment, thanks to IOIA staff and consultants. This tool can help IOIA do outreach.

**Latin American Committee:** Lidia Gavronsky thanked IOIA for establishing a scholarship fund to help enable more Latin American inspectors to come to this annual meeting

**Ethics Committee:** Joyce Ford, Chair, reported that the function of the committee is to address complaints, and that they were happily inactive this year. Qualifications for serving on this committee are to be a past IOIA Board or accreditation committee member.

**Fundraising Committee:** Diane Cooner, Chair, reported on a recent workshop she attended and presented an array of ideas for fundraising in the future.

Jack Reams, Brian Magaro and Garry Lean were re-elected to the Board of Directors.

Ann Lameka and Karen Troxell were elected as new Alternates.

Bylaws amendments 1 and 2 were passed.

**Open Discussion on IOIA's Role in the industry and priorities**

**Membership:** IOIA may develop a business plan that would include efforts to increase membership. Related is communications with certifiers to encourage them to use inspectors who are members, and especially accredited members of IOIA. IOIA has a certain level of presence in the organic world, and could have more influence, even among governments.

**Training:** IOIA needs to improve the quality of training offered. Training may not be limited to inspectors, but reach other audiences, for example, training about internal control systems for grower group managers. Training needs to be relevant. Inspectors need audit skills, knowledge and experience with ISO standards and Eurogap standards, especially those who work internationally. Distance Education is an opportunity and need in Latin America, and could create opportunities for training without such high travel costs.

**Outreach:** There are many new certifiers that may not know about IOIA. They need to be contacted and informed about whom IOIA is, what services are available, training opportunities, and advantages of hiring IOIA-trained and IOIA member and accredited inspectors. New certifiers include seed certification agencies, state and national government, private for-profit and nonprofit certifiers. There are many other structures of certifier businesses.

IOIA Inspector Accreditation: Efforts to promote hiring accredited inspectors needs to be accompanied by assurance of a high degree of competence and professionalism.

**Mission:** In order to be a vibrant professional association, we need an analysis of the organic inspection environment. What are the new areas of inspection? How is the organic movement changing? Where is the organic industry going? Where is the food processing industry in general moving? How do we market ourselves?

The next AGM will be held March 19 or 20, 2005, most likely in Vancouver, British Columbia, Canada.

**April 15, 2004**

Decision-making procedures; AGM as forum for discussion:

The Board decided to establish the following procedures for annual meeting agendas and decision-making. Our intent is to facilitate opportunities for the membership to consider the impacts and implications of Bylaws decisions.

- In the pre-AGM mailing, send out proposed wording of proposals. Include relevant information about the history and possible implications of proposed Bylaw changes or other decisions.
- Provide time for discussion of issues at the AGM.
- After the AGM, mail out a ballot to members. Provide a summary of points raised (pro/con) in the AGM discussion with respect to decisions to be made. [Minutes continued on page 27]

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## Committee Reports

**Accreditation:** Chair Jake Lewin, [jake@sasquatch.com](mailto:jake@sasquatch.com) 831-469-3964, Garry Lean, see Bylaws. No report submitted.

**Bylaws:** Chair Arthur Harvey, 207-388-2860, [arthurharvey@yahoo.com](mailto:arthurharvey@yahoo.com) Liaison Garry Lean, 705-887-5230 [garrylean@sympatico.ca](mailto:garrylean@sympatico.ca)  
No report submitted, due to no activity at this time.

**Canadian Committee:** Chair Janine Gibson, 204-434-6018, [janine@mb.sympatico.ca](mailto:janine@mb.sympatico.ca), Liaison Dag Falck 250-379-2614 [dfalck@junction.net](mailto:dfalck@junction.net) Janine was recently appointed by the board to serve as committee chair. See current Canadian standards news, page 9.

**Communications & Marketing:** Chair Bob Howe, [earthorganic@aol.com](mailto:earthorganic@aol.com) 845-657-9592. Liaison Brian Magaro, 717-732-7940, [magarob@aol.com](mailto:magarob@aol.com) Bob has been in contact with a professional video producer regarding training and informational videos.

**Compensation/Working Conditions:** Chair: Eric Feutz, 573-256-7643, [brandt\\_01@email.msn.com](mailto:brandt_01@email.msn.com) Liaison Doug Crabtree [dcrabtree@state.mt.us](mailto:dcrabtree@state.mt.us) 406-444-9421  
No report submitted.

**Editorial Review:** Chair Joe Montecalvo, [montecalvo@aol.com](mailto:montecalvo@aol.com) 805-772-3574, Liaison Dag Falck (see Canadian Committee). No report submitted.

**Ethics:** Chair Joyce Ford, [jford@hbci.com](mailto:jford@hbci.com) Liaison: Brian Magaro (see Communications & Marketing). The Board has approved two new members of the Ethics Committee. Chip Kraynyk and Joe Montecalvo will serve a two-year term ending in January 2006. The Ethics Committee has had no complaints so far in 2004.

**Finance:** Chair/Liaison: Jack Reams, 604-858-9815, [marlene\\_reams@telus.net](mailto:marlene_reams@telus.net)  
Nothing to report at this time.

**Fundraising:** Chair Diane Cooner, 707-869-3017, [amani01@sonic.net](mailto:amani01@sonic.net)

Liaison Jack Reams, see Finance. No report submitted.

**Latin American:** Chair Lidia Gaivronsky, 5411)4 503-3106, [gaivi@sion.com](mailto:gaivi@sion.com) Liaison Luis Brenes, [lbrenes@racsa.co.cr](mailto:lbrenes@racsa.co.cr) +506-226-1681. After the AGM in Costa Rica, the Latin American Committee had a meeting to establish new guides of action. Now, the Committee is working on them, with the goal to elaborate on a document to be sent to the Board. As in other opportunities, this meeting allowed us to be better every day, as professionals, on a personal level, and to re-affirm our organic ethics and conduct.

**Membership:** Chair Chris Kidwell 530-628-4560, [ckidwell@tcoek12.org](mailto:ckidwell@tcoek12.org), Liaison Garry Lean, see Bylaws. No report submitted. See membership update, page 2.

**Scholarship:** Chair Nancy Ludwig, 503-588-5446, [nancyludwig@comcast.net](mailto:nancyludwig@comcast.net) Liaison Ann Baier, see TOC.

The committee seeks to fill its one vacant seat. (Ideally, we hope to find a Spanish-speaking member from outside of the US and Canada to facilitate the community initiative (CIS) scholarship review and selection.)

We updated the scholarship forms in the IOIA office and on the web site to assure that the most current forms would be used for the applicants for this coming year.

**Training:** Chair Janine Gibson, 204-434-6018, [Janine@mb.sympatico.ca](mailto:Janine@mb.sympatico.ca) Liaison Ann Baier, see TOC  
No report submitted.

**Training Oversight Committee:** Chair Harriet Behar, [harrieta@mwt.net](mailto:harrieta@mwt.net) Liaison Ann Baier, [ahbaier@aol.com](mailto:ahbaier@aol.com) 831-426-2052. Ongoing, approving trainings and TC's. The TOC continues with its ongoing work of interfacing with Lisa Pierce, regional training coordinator, and giving input and approval for upcoming IOIA trainings as well as the Training Coordinators that are chosen to lead those trainings. The six members of the committee, Ann Baier, Janine Gibson, Billy Hunter, Chip Kraynyk, Rick Martinez and myself, Harriet Behar ask Lisa questions and give Lisa a place to work through possible issues with group of knowledgeable individuals. All work is done via email. 🐾

## Notes, from page 1

Board feels that this will allow for expanded membership discussion on changes and also allow those members not able to attend the AGM the opportunity to have additional information from the discussion at the AGM prior to voting on Bylaw changes.

The election for the Board of Directors resulted in no changes to the Board and the election of 2 new alternates. Those elected as alternates are Ann Lameka and Karen Troxell. I wish to thank the Election Committee for their efforts and all candidates who offered their time and considerations to serve on the Board. I wish to thank the membership for their vote of confidence in the current BOD which will allow for continued continuity especially with the major turnover in 2003.

IOIA was well-represented in Chicago at the All Things Organic show and had a presence at many meetings. Please see Notes from the ED for more on this.

I truly hope all have a great inspection season, safe travels and take a few minutes to enjoy all that surrounds you. 🐾

## MICI, from page 6

outdoors and freedom of movement.

This action stems from USDA's Administrator of the Agricultural Marketing Service, A.J. Yates, overruling an organic certification decision made by Massachusetts Independent Certification, Inc. (MICI) in October, 2002. MICI had turned down an application for organic certification from an egg producer, The Country Hen, because it found that the applicant failed to provide its birds with access to the outdoors, as required by organic regulations. The day after MICI issued its formal decision, Administrator Yates directed MICI to issue an organic certificate. Possession of an organic certificate entitles producers and food processors to use the USDA Organic seal on food containing 95% or more organic ingredients and produced according to the organic system plan.

USDA claims that agency regulations bar certifying agents from appealing in situations like this. For over a year, MICI has striven to vindicate its right to appeal under the Organic Food Production Act as well under the due process clause of the United States Constitution. Both an Administrative Law Judge and the Judicial Officer within USDA have declined to find jurisdiction over the appeal.

MICI is considering possible next steps in order to vindicate its appeal rights and obtain a court ruling on the propriety of the Administrator's decision. 🐾

## Resources

**'Car office' organizer** Useful for those who inspect out of their cars. Rugged and useful as advertised. \$30 +s/h. According to member Drew Stuckey, "It paid for itself the first time a farmer wanted to ride in my car, and all the clutter on the passengers seat was relocated by picking up one strap, actually, just spinning the "Cab Commander" around to hang off the back of the passenger seat. I recommend it. Check it out, [www.duluthtrading.com](http://www.duluthtrading.com)"

**The World of Organic Agriculture 2004 Statistics and Emerging Trends** (english version) download at <http://www.soel.de/oekolandbau/weltweit.html> under:  
Download as pdf-file (1.8 MB)

**Food Labeling Compliance Review, 3<sup>rd</sup> Edition**, by James Summers & Elizabeth Campbell. 177pp. Book details every aspect of what is legally allowed on product labels and how it has to be accomplished. \$176/book, \$187/CD. From Hotline Publishing, [www.hotlineprinting.com/obn.html](http://www.hotlineprinting.com/obn.html)

**The March 2004 update of Organic Agricultural Products: Marketing & Trade Resources** is a comprehensive guide to more than 700 online resources pertaining to all aspects of markets, marketing, and trade, including:  
\*USDA National Organic Program regulations and related laws and legislation;  
\*background documentation regarding standards;  
\*food-related labeling and regulatory programs and information;  
\*exporting, importing, and international food law issues;  
\*how-to guides for producers and retailers;  
\*guides to trading and supplier sites, price indexes, marketing events, consulting firms, and business journals and newsletters.

This guide also identifies government and commercial market data sources along with specific industry and consumer studies published during the past 5 years. Organic marketing support organizations and recommendations on how searchers may find help specific to their needs is also

included. Live links or availability information is provided for each listing; an index guides searchers looking for specific organizations and documents. Available in PDF format on mini-CDROM -- copies are free on request; or on the AFSIC Web Site in both PDF and HTML formats.

To request the CDROM: Phone: 301-504-6559; Fax: 301-504-6409; TDD 301-504-6856; Email: <mailto:afsic@nal.usda.gov>  
<http://www.nal.usda.gov/afsic/>  
AFSIC\_pubs/srb0301.pdf  
[http://www.nal.usda.gov/afsic/AFSIC\\_pubs/srb0301.pdf](http://www.nal.usda.gov/afsic/AFSIC_pubs/srb0301.pdf)  
AFSIC Web Site:  
<http://www.nal.usda.gov/afsic/>  
<http://www.nal.usda.gov/afsic/>

**Purdue Forage Field Guide** (ID-317), 264-pg reference manual on 20 forage crops, \$8 from Purdue University Extension, 1-888-398-4636; [media.order@purdue.edu](mailto:media.order@purdue.edu); sample pages are online at [http://www.agry.purdue.edu/dtc/forage\\_guide.html](http://www.agry.purdue.edu/dtc/forage_guide.html).

**Socio-economic Aspects of Animal Health and Food Safety in Organic Farming Systems** (289 pgs), proceedings from Sept. 2003 conference in Florence, Italy, <http://www.safonetwork.org/publication>, or contact co-editor Susanne Padel, Institute of Rural Studies, University of Wales, [sxp@aber.ac.uk](mailto:sxp@aber.ac.uk).

**Alternative Food Initiatives in California: Local Efforts Address Systemic Issues** (12 pgs, research brief #3), [http://zzyx.ucsc.edu/casfs/about/Brief3\\_AFI.pdf](http://zzyx.ucsc.edu/casfs/about/Brief3_AFI.pdf), or contact Center for Agroecology and Sustainable Food Systems, University of California, (831) 459-3240; [martha@zzyx.ucsc.edu](mailto:martha@zzyx.ucsc.edu).

**Batteries Not Included: Organic Farming and Animal Welfare** (90 pgs), linked from <http://www.soilassociation.org/web/sa/saweb.nsf/shop/index.html>; print copy is A312 plus S/H from Soil Association (UK), [sass@soilassociation.org](mailto:sass@soilassociation.org).

**Alternative and Herbal Livestock Health Sourcebook** (164 pgs), including

proceedings from October 2000 conference co-sponsored by Northeast SARE, <http://www.canr.uconn.edu/plsci/AHLH%20SB-Web.pdf>; print copy (limited supply) is \$8 for S/H, (860) 486-6271; [rochelle.syme@uconn.edu](mailto:rochelle.syme@uconn.edu).

**Building Farm Resilience: Challenges and Prospects for Organic Farming** (52 pgs), doctoral thesis from Swedish University of Agricultural Sciences, linked from <http://diss-epsilon.slu.se/archive/00000170/>, or contact Rebecka Milestad, Dept. of Rural Development Studies (Uppsala), [Rebecka.Milestad@lbutv.slu.se](mailto:Rebecka.Milestad@lbutv.slu.se).

**California Certified Organic Farmers 2004 Organic Directory** (168 pgs) including certified operations and services, websites, apprenticeships, and more, \$10 from CCOF, (831) 423-2263.

**Organic Produce, Price Premiums, and Eco-Labeling in U.S. Farmers' Markets**, 12-pg report from USDA Economic Research Service, Contact co-author Catherine Greene, [cgreene@ers.usda.gov](mailto:cgreene@ers.usda.gov) Or go to [www.ers.usda.gov/publications/VGS/Apr04/vgs30101](http://www.ers.usda.gov/publications/VGS/Apr04/vgs30101), or



**Sustainable Agriculture and Integrated Pest Management (IPM) Resource & Information Directory** (5th edition, 34 pgs), <http://www.mda.state.mn.us>; print copy is free from Sustainable Agriculture & IPM Program, Minnesota Dept of Agriculture, (651) 296-7686; [alison.fish@state.mn.us](mailto:alison.fish@state.mn.us).

**Who Owns Organic?** from RAfi. Access the electronic version at [www.rafiusa.org/pubs/OrganicReport.pdf](http://www.rafiusa.org/pubs/OrganicReport.pdf)

**Small Farm Canada** A brand new magazine dedicated to promoting small-scale farming as a legitimate and viable endeavour. 6 issues per year, \$21.95 Cdn, GST included. [www.smallfarmcanada.ca](http://www.smallfarmcanada.ca)

**Organic Processing Magazine** – another great new resource. Subtitled Strategies for Best Practices in Food, Fiber and Personal Care. Quarterly, Free to qualified readers, [www.organicprocessing.com](http://www.organicprocessing.com), [info@organicprocessing.com](mailto:info@organicprocessing.com)

## De Nuestros Inspectores Adentro Latinamerica

Estimados colegas

Disculpen el atrazo, regresé anoche de una pasantía de 10 días en Nicaragua. No sé si todavía estoy a tiempo...de todos modos aquí mi parrafito....

CEDECO promueve el proceso de certificación del grupo de productores orgánicos que proveen los canales de comercialización promocionados por la institución. Gran parte de mi función en Cedeco es el seguimiento a las fincas orgánicas. Esto incluye el mencionado proceso de certificación. La certificación grupal apenas se está normando y se esta capacitando personal para asesorar a los productores en los procesos de producción y procesamiento, así como a los sistemas de control interno que rigen al grupo.

De manera que decidí ampliar mis conocimientos en el tema para brindar asesoría mejor fundamentada en mi trabajo para cedeco.

Para mis expectativas el curso fué sumamente provechoso logrando el objetivo general de familiarizarnos con los principales elementos para interpretar las normas y para manejar los principios básicos de inspección en agricultura orgánica.

Logré proveerme con los conocimientos y las herramientas básicas para evaluar procesos de certificación nesarios para la asesoría que debo brindar.

Además el curso me motivó a continuar el proceso de formación en este tema hasta llegar a ser inspector para poder aportar también en otros frentes del movimiento orgánico. Me parece una combinación ideal especializarse en el tema para el trabajo diario de asesoría y a la vez aprovechar los conocimientos adquiridos para ofrecer servicios de inspección a otras organizaciones.

Saludos  
Gaudenz



Ilustres Colegas del Curso IOIA,  
Es una satisfacción haber compartido los 4 intensos días del curso con ustedes.

Mi interés inicial era conocer personas involucradas y activas en el movimiento orgánico.

Lo que supero mis expectativas, no solo por las calidades de todos, sino también el nivel de los comentarios y discusiones. En cuanto al contenido, presentación e instructores, nada tengo que comentar, solo felicitar. Imaginaba un curso muy tecnócrata y volteado a producción orgánica de sustitución de insumos. Felizmente aprendí mucho en el campo de las normas, evaluación de insumos, inspección de campo y principios de un inspector.

En la presentación a la gerencia y colegas de la empresa, destaque puntos que fueron aclarados durante el curso, y basado en la norma, las posibilidades de desarrollo del proyecto orgánico para la Hacienda. Por consecuente a la capacitación del curso las discusiones técnicas buscan estrategias más sostenibles según el principio de prevención, manejo y control. Con un mejor respaldo e ayuda de la norma trabajada en el curso. Así que espero mejorar el proyecto de arroz orgánico, así como encaminar nuevos y seguir adelante en el proceso de capacitación a inspector orgánico.

Saludos a todos,  
Mark Hillmann.

P.s, Anduve sien conectarme esos días. Se aindale sirve con mucho gusto escribo en Ingles.

Hacienda La Pacífica S.A.  
Cañas – Guanacaste, Costa Rica



### Comentario sobre mi experiencia en el curso

Tomé dicho curso ya que mi trabajo con la Gerencia Técnica de Acreditación y Registro en Agricultura Orgánica del Servicio Fitosanitario del Estado es el de realizar inspecciones a productores en transición y a productores certificados como orgánicos.

En mi caso fue una experiencia muy provechosa y que considero indispensable para poder ejecutar mi trabajo con un mayor criterio. Yo laboré en la función indicada por unos meses antes de recibir el curso y éste me ha ayudado a ordenar muchas de las ideas que había adquirido.

Creo que por si solo el curso no basta para considerarse conocedor de la

materia, pero con las bases adquiridas puedo por mi propia cuenta profundizar mediante estudio y mediante la experiencia diaria, y de esta manera llegar a ser un buen inspector y poder compartir el conocimiento adquirido a los productores y personas involucradas en agricultura orgánica en la medida en que mi trabajo lo permita.

Juan Rojas Chaves.

Gerencia Técnica de Acreditación y Registro en Agricultura Orgánica  
Servicio Fitosanitario del Estado  
Ministerio de Agricultura y Ganadería  
Costa Rica



Mark Hillmann also translated into English his comments for the newsletter

Dear Friends from IOIA Course,

It was a great time to stay this 4 days with so nice people. First, I expected to meet people active in the organic movement. This was really incredible, not just because the characteristics of every one, but also for the discussion.

The course was very well conducted: lectures, instructors and subjects. Not just theory and looking for polemic things like inputs substitution for organic systems. I really learned a lot about standards and inspections.

When I presented the results to my company directors, we discussed a lot on new strategies to be more sustainable in the organic rice production. Using the principle of 205.206: prevention, management and, if needed, control. The norms help also to plan future objectives for our production system. All of this show how import is to continues the process to be organic inspector.

It was a pleasure to be in the course.

Regards, Mark



Hello Board and Margaret:

First...thank you for support for assist to Advanced Course. It was a big opportunity for learn so much about fiber and inputs for cleaning !

Second... The AGM was an excellent internship between us but I think that everybody have to work very hard, still.

Again, thanks

Carlos Escobar, Colombia



## GE Soy Creates Havoc in Argentina

KNOWN for its vast pampas with cows grazing on the pasture, Argentina has a long history as a beef and dairy producer. Indeed, that is now history. Gone are the pastures and happy ranchers as many farmers have converted their farmland to cultivate a new brand of crop – the Round-up Ready (RR) soya, a herbicide-tolerant plant, in 1996.

With promises of lower cost, less maintenance and reduced use of agro-chemicals that had caused a host of environmental problems such as soil and water contamination, the farmers were, understandably, eager to try out the high tech crop.

That was how GM crops were introduced to Argentina. Agronomist Adolfo Boy says the switch to GM crops failed to deliver the good life.

Instead it has eroded the fundamentals of food sovereignty of Argentines – farmers have grown dependent on GM crops, fail to save their farm seeds and the environment has been further degraded.

"We are not in a crisis. We are heading towards a catastrophe," cries Boy who has observed and documented the advent of GM crops into his country. According to the founding member of the Network for a GE-Free Latin America, prior to the introduction of Monsanto's RR soy, Argentina was already producing soya for the Chinese oil market since the 1970s.

However, when Monsanto introduced its transgenic soya, the area planted with soya doubled from seven million ha to 14 million ha and production jumped from 13 million to 37 million tonnes. The increased production came at the expense of deforestation and the disappearance of traditional agricultural models that are increasingly being acknowledged as the foundation for a sustainable future. "As the area under cultivation expanded, the first effect was the abandonment of the mixed farming systems upon which sustainability was based – the rotation of crops and cattle which helps soil fertility to recover and provides security in the long run.

"Then, fences, mills and ranching structures were gradually removed. The land entered into a process of permanent crop production, in lots comprised of several small to medium-sized farms in the range of 50 to 100ha," he recalls. A country that used to be able to feed its population has redirected its agriculture to export-oriented production, thus neglecting the need to take care of hunger back home. "Argentines do not use soya oil, we use sunflower oil. Products for local consumption were abandoned for RR soya," says Boy, noting that traditional corn, rice,

lentil and dairy production were all sidelined. While soya production grew by 74.5% between 1996 and 2002, official figures show decreases in the area sown with the following food crops: 44.1% for rice, 26% for corn and 3.5% for wheat.

Highlighting the irony of the short-sighted agriculture policy manifested in the dairy sector, Boy says dairy exporters were reduced from 30,141 in 1998 to 15,000 in 2002. "RR soya domination was so acute that it now reaches the point where Argentina is importing milk from Uruguay." Boy also points out that GM crops are a technology for large farms under the pretext of economy of scale, hence promoting the concentration of land in the hands of a few that leads to migration to the cities. "It has generated unemployment and the migration of more than 250,000 rural families in the last 14 years largely because their land has passed into the hands of financial institutions that prefer the 'farming pools' method and concentrate millions of hectares into soya production.

"These contractors own bigger and faster machines, resulting in severe erosion of the fertile pampas," says an exasperated Boy. Reduced food production has plunged Argentina into a state of hunger and is breeding contempt for the government and social unrest.

Disputing the seed industry's sales pitch that GM crops require less herbicide, Boy says farmers are using more than one herbicide with the introduction of RR soya. In fact, the quantity has increased and more toxic herbicides have to be used to control weeds that are getting hard to eradicate – a sign of growing resistance.

According to the Friends of the Earth report entitled *Genetically modified crops: a decade of failure (1994 – 2004)*, released at the COP-7 meeting in Kuala Lumpur, in 2001 alone, more than 9.1million kg of herbicide were used for GM soy in comparison with non-GM plants. The use of glyphosate herbicide doubled from 28 million litres between 1997-98 to 56 million litres in 1998-99 and reached 100 million litres in the 2002 planting season. It noted that weed resistance has prompted the use of highly toxic herbicides with RR soy, and farmers have started using herbicides that are banned in developed countries like atrazine and paraquat.

Boy says without patenting the RR soya in Argentina, farmers multiplied their seeds and thus flooded their fields with RR soya. Farmers were engaged in a well-known traditional practice called "brown-bagging" whereby they save the seeds for the next planting season to reduce their costs. However, the transgenic soya was patented in 2000 following complaints from American farmers who were paying US\$20 (RM76) per kg of seed as opposed to US\$12 (RM45.60) per kg paid by their Argentine counterparts.

Hence, it is now illegal for farmers to save their seeds in the field and they face the risk of prosecution.

Boy also challenges the apparent cost-saving advantage from the reduction in herbicide use as claimed by the seed industry. The lowered cost, he reveals, was due to the import of Chinese-produced glyphosate that was far cheaper and resulted in 50% reduction of herbicide costs for the farmers. Again, this savings will not be for long as Monsanto has sought legal redress against the dumping of glyphosate by Chinese producers. "Let Argentina be a warning to others. We are going down the path of destruction," warns Boy. Asia, he says, will suffer more as it has much more diverse biological resources that risk being destroyed by GMO contamination. His colleague, Dr Lilian Joensen, who is also a molecular biologist and researcher with the Ministry of Health of Argentina, notes that as the industry seeks to expand the cultivation of RR soya, more forests are cleared to make way for this monoculture.

Describing the situation as total madness, she says: "My government doesn't seem to have the political will to turn back from this path. And it looks like we have to contend with more adverse consequences from GM crops."

And there seems to be no way out as there is so much at stake for Argentina. It is the second largest exporter of GM crops after the United States.

Despite the mayhem back home, the Argentinean government is negotiating at the first meeting of the Cartagena Biosafety Protocol in the same group of countries dubbed the Miami Plus Group that is reportedly trying to weaken the liability and redress regime that is suppose to be established by 2008.

At the rate contamination by GM crops is raging around the world, one wonders if four years is not too long a wait to have an international liability and redress regime to address the problems created by the introduction of transgenic crops in just under a decade.

£ £ £ £ £

## NOP, from page 26

allow the use of List 3 inerts, once the certifier determines that a product contains one. Rescinding this directive could be interpreted to mean that the use of a pesticide containing a List 2 or 3 inert requires the certifier to deny, suspend or revoke the producer's certification and/or disqualify the treated land from being certified for 3 years. 🍌

*Margaret Scoles and Doug Crabtree attended the recent National Organic Standards Board (NOSB) public comment session on April 30, the annual meeting of the National Association of State Organic Programs (NASOP) on May 1 and two training and information sessions for Accredited Certifying Agents and State organic programs hosted by NOP staff, all in Chicago. Scoles is Executive Director of IOIA. Crabtree manages the Montana Dept of Ag's organic certification program and is an IOIA Inspector Member. They collaborated on this article.*

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## GMO NEWS

### Monsanto Pulls Plug on Embattled Biotech Wheat

Monsanto announced in early May that it is pulling the plug on genetically engineered wheat after seven years of development and failed efforts to win over farmers and the international wheat market. The company made the announcement even as its application for commercialization remains pending, signifying that stiff opposition to the biotech food crop from U.S. farmers and international markets could not be overcome.

"Monsanto may call this a corporate realignment, but it's really a full retreat," said Joseph Mendelson, legal director for the Center for Food Safety. "This is a huge victory for farmers, consumers and food safety advocates and signifies a turning point in the battle against GE foods."

Monsanto has suffered a number of significant setbacks in the past few years: the continuing rejection of GE foods by food manufacturers (at least 52) and international export markets (over 35 countries); in December 2003 the company was forced to cut distribution of its high-profit recombinant Bovine Growth Hormone (Posilac) by 50% after its Austrian production facility failed sterility tests; in October 2003, it was forced to pull out of any attempts to market biopharmaceutical crops resulting in the layoff of approximately 1,200 people; Monsanto lost \$1.8 billion in fiscal 2002 and its stock value has fallen 50% since 2001; and PCB and Agent Orange issues continue to be significant drags on company resources.

### Monsanto Prevails In Patent Fight

The Canadian Supreme Court has narrowly upheld a ruling against Percy Schmeiser, a Saskatchewan farmer who used genetically modified canola seeds patented by Monsanto while replanting his field.

In a 5-4 decision, the court sided with the biotech giant, which sued Schmeiser in 1997 after Monsanto agents found the company's patented gene in canola plants on his farm. The court agreed that he stole Monsanto's seed, even though Schmeiser maintained that he inadvertently used seed that had blown into his field.

Despite the ruling, Schmeiser, 73, said the decision is a personal victory because the court also ruled that he did not profit from the seed. Schmeiser will not have to pay the \$200,000 sought by Monsanto to cover court costs and the profit the company said Schmeiser had gained by using its seed.

There are implications beyond this case, said Schmeiser and his supporters, including the Council of Canadians and the National Farmers' Union of Canada. At the heart of the matter, they said, is a farmer's right to save and use seeds from year to year.

The lower courts said that Schmeiser "knew or should have known" that he planted the patented seed. Schmeiser said that at the time he didn't know any patent existed on the plant, but the Supreme Court upheld the lower courts' ruling.

### Mendocino NoGMO Vote Passes

Signaling another turning point in the effort to halt the introduction of GMO crops in the U.S., the citizens of Mendocino county, California, approved a countywide measure that prohibits the "propagation, cultivation, raising and growing of GMO's." With 98% of the precincts reporting, the final tally was 56.34% for and 43.66% against.

Measure H, which had wide support from county residents, farmers, wineries, business owners, and even the County Sheriff, is the first countywide ban on GE crops in the US. Its victory is sure to be felt around the nation and world.

CropLife America -- a national lobbying group representing agribusiness giants like Monsanto, DuPont and Dow -- pumped an unprecedented \$518,000 into the opposition's smear campaign to defeat the initiative and is expected to attack the measure in court. The proponents of Measure H spent \$79,000, raised mostly from small local contributions.

Local vintner Katrina Frey, co-owner of Frey Winery said "Mendocino County is the first GMO-free county in the nation, and I am sure it will not be the last. There are currently 9 other California Counties [including Humboldt, Sonoma, and San Luis Obispo] considering similar measures. I'm sure this will motivate many other counties nationwide to mount similar efforts."

The county is home to a number of wineries and vineyards, including Fetzer Vineyards, the largest grower of organic grapes in the nation with plans to produce only organic wines by 2010.

### VT Gov Signs Nation's First GMO Labeling Law

In mid-April, Gov. James Douglas made Vermont the first U.S. state to require manufacturers of GE seeds to label and register their products.

The measure was one part of a three-pronged agricultural legislative package that also includes a bill that would make changes to water pollution rules for large farms and alter the state's right-to-farm law.

Under the bill, seeds that are genetically altered or engineered must be labeled as such after Oct. 1. Seed manufacturers must report their total sales in the state to the Secretary of Agriculture every Jan. 15.

The amount of genetically altered crops grown in Vermont is not precisely known, as the only data comes from seed manufacturers on a voluntary basis. Estimates last year by state officials pegged the figure at anywhere between 20 and 40%.

### Venezuela Prohibits GMO's

President Hugo Chavez Frias has announced that the cultivation of GMO crops will be prohibited on Venezuelan soil, possibly establishing the most sweeping restrictions on transgenic crops in the Western Hemisphere. Though full details of the administration's policy on GMOs are still forthcoming, the statement by President Chavez will lead most immediately to the cancellation of a contract that Venezuela had negotiated with US-based Monsanto.

Before a recent international gathering of supporters in Caracas, President Chavez admonished GE crops as contrary to interests and needs of the nation's farmers and farm workers. He then zeroed in on Monsanto's plans to plant up to 500,000 acres of transgenic soybeans in Venezuela. "I ordered an end to the project," said President Chavez, upon learning that transgenic crops were involved. "This project is terminated."

President Chavez emphasized the importance of food sovereignty and security -- required by the Venezuelan Constitution -- as the basis of his decision. Instead of allowing Monsanto to grow its transgenic crops, these fields will be used to plant yuca (an indigenous crop), Chavez explained. He also announced the creation of a large seed bank facility to maintain indigenous seeds for peasants' movements around the world.

Closer to home in Venezuela, Monsanto manufactures the pesticide glyphosate, which is used by the neighboring Colombian government as part of its Plan Colombia offensive against coca production and rebel groups. The Colombian government aerielly sprays hundreds of thousands of acres, destroying legitimate farms and natural areas like the Putomayo rainforest, and posing a direct threat to human health, including that of indigenous communities.

"If we want to achieve food sovereignty, we cannot rely on transnationals like Monsanto," said Maximilien Arvelaiz, an advisor to President Chavez. "We need to strengthen local production, respecting our heritage and diversity." It is hoped that Venezuela's move will serve as encouragement to other nations contemplating how to address the issue of GMOs. "The people of the United States, of Latin America, and of the world need to follow the example of a Venezuela free of transgenics."

### Bayer Withdraws GM Crop

In what has been described as a "massive blow to the GM lobby", gene giant Bayer withdrew its GM maize from commercialization just weeks after the Blair government said it intended to give it the first go-ahead for a GM crop in the UK. Bayer announced that its GM maize variety Chardon LL had been left "economically non-viable" because of conditions environment secretary Margaret Beckett imposed when she gave it limited approval.



Bayer's decision to withdraw the crop from the UK and other European markets means GM crops are unlikely to be grown in the UK until at least 2008.

## **USDA Denies Pharm Rice Permit**

In a decision that could affect a growing debate over the planting of GE rice in California, a federal agency has ruled against a company's bid to grow its crops in this state.

Citing concerns about the potential for mix-ups between the biotech rice and commercial varieties, the U.S.D.A. denied a permit that would have allowed Sacramento-based Ventria BioScience to plant rice genetically engineered for the production of pharmaceuticals. Ventria said the denial is likely to be only a small setback for its quest to plant in California up to 120 acres of rice.

The application has ignited fierce protests from both farmers and environmentalists. Farmers fear the introduction of GE rice will destroy a \$500 million industry because of the threat of contamination and potential boycotts from Europe and Asia. Environmentalists say not enough is known about the crops' effects on wildlife. Despite those objections, the company received approval on March 29 from the California Rice Commission, a group of marketers and growers that sets guidelines for planting and production. Ventria now awaits a final decision by the secretary of the California Dept. of Food and Agriculture on whether it can plant this spring.

However, the USDA's denial will trump any decisions made by the California agencies. In its letter to Ventria, the USDA said growth of the biotech crops should be in isolated areas, away from commercial rice crops. The agency said it was concerned that Ventria's rice is growing within 100 feet of rice intended for human and animal food.

## **U.S. Govt Lacks "Comprehensive Policy" to Review Safety of Engineered Insects, Says Pew Report**

The federal government lacks a "comprehensive policy" for reviewing environmental safety and other issues surrounding gene-altered insects, according to the Pew Initiative on Food and Biotechnology. While a number of laws could apply to transgenic insects, federal regulators have not indicated whether and how a regulatory review would be conducted, which agencies would be involved, or how they would coordinate. Current research projects in U.S. government and academic labs include mosquitoes unable to transmit

malaria, honeybees altered to resist pesticides and diseases, and silkworms designed to produce stronger silk. The Pew report warns that insects provide unique safety concerns since they are highly mobile and have critical functions within ecosystems, and some projects seek to replace wild insect populations with engineered strains, or target insects in other nations. "Bugs in the System?: Issues in the Science and Regulation of Genetically Modified Insects" (119 pages) is online at <http://www.pewagbiotech.org>, or phone (202) 347-9044.

## **UCS Report on GE Contamination**

The Union of Concerned Scientists has released a landmark report showing that federal regulations have failed to prevent contamination. Their groundbreaking report documenting wide spread genetic contamination of corn, soybean and canola seed stock seeds. (see [www.ucsusa.org](http://www.ucsusa.org) for "Gone to Seed" report). It has been estimated that between 60 and 75% of ALL non-organic supermarket processed foods test positive for the presence of GE ingredients. There is no legislation requiring GE foods to be labeled as such, despite an estimate that between 80-95% of the people want this labeling (most want the labeling so they can avoid GE foods).

## **Death Of Bovine Growth Hormone**

By Robert Cohen

You will soon be reading a remarkable headline. The genetically engineered bovine growth hormone is dead. Posilac, aka rbGH, rbST, cow-fuel, milk-poison, will soon cease to exist.

A tough decision awaits executives at the upper echelons of Monsanto. A decision is being debated in corporate corridors. They cannot afford to take Posilac off of the market, for that would be the end of their genetic engineering technology. On the other hand, they cannot afford to keep Posilac on the market, for the entire dairy industry has woken up to this fact of economic reality: the genetically engineered bovine growth hormone was bad for business.

Surplus milk resulting from this hormone kept milk prices low.

Adverse publicity from the bovine growth hormone caused people to question all milk consumption.

Adverse publicity from the bovine growth hormone caused people to explore milk alternatives, like soymilk.

On Sunday, December 21, 2003, I filed a Freedom of Information Act (FOIA) request with the Food and Drug Administration (FDA). One day earlier, I had received a copy of a letter alerting dairy farmers that Monsanto's genetically engineered bovine growth hormone (rbST) would be in short supply. Monsanto wrote:

"Supplies of Posilac bovine somatotropin (rbST) are temporarily limited while necessary corrections and improvements in manufacturing are made by Monsanto's supplier."

I smelled something rotten in Monsanto-land.

That next day, I called many people at FDA, attempting to get the facts. Nobody was talking. In 1999, I had filed a citizen's petition with FDA to take Posilac off the market. I submitted evidence of how Monsanto defrauded FDA. It took FDA five years to act. They closed Monsanto's Posilac factory a few months ago. Monsanto lied to dairy farmers, calling it a "temporary production problem."

Monsanto had created a potential catastrophe for humankind. I give FDA credit for finally acting.

I discovered that Monsanto had made a gene transcription error during the development of their new genetic technology. Proteins are made up of amino acids. Each time that Monsanto attempted to re-create their new hormone, one amino acid, lysine, was incorrectly transcribed as a "freak" amino acid, epsilon-N-acetyllysine.

For nearly five years, FDA ignored my request.

Then, things became interesting. Monsanto mailed a letter to Posilac-using dairy farmers on December 19, 2003. Monsanto shocked farmers by alerting them that Posilac would be in limited supply until: "Conditions and improvements in manufacturing are made..."

Monsanto accepted no new customers, and anticipated their "shortfall" to last for "several months."

Monsanto attempted to fix the errors. They have not been successful. FDA now knows of those mistakes because my whistleblowing broke windows.

On Wednesday, February 4, 2004, I received the damning evidence that confirmed Monsanto's crime against humankind. Thirty hours of non-stop research and confirmation later supported the magnitude of Monsanto's crime.

In a column written before last Christmas, I predicted:

"Mark down this date, 12/19/03. This may very well be the defining moment that ends the use of genetically engineered foods in America's food."

Four days after writing and posting that column, I received an envelope from FDA confirming my worst fears. My FOIA request. Truth, at last. The entire request cost me \$18.30. This revelation shall cost Monsanto and its stockholders considerably more.

The most damning evidence was found in observation number 1, filed by an FDA investigator after inspecting Monsanto's recombinant bovine somatotropin (rbST or Posilac) production facility at Biochemietrasse 10, Kundl, Austria.

### **OBSERVATION 1**

"There is a failure to thoroughly review the failure of a batch or any of its components to meet any of its specifications whether or not the batch has been thoroughly distributed."

"Specifically, the corrective actions implemented after the investigation of nine sterility failures reported since 2001 [see **GMO**, page 26]

## GMO, from page 25

2001 (3 for 2001, 3 for 2002, and 3 for 2003) for Posilac injection or for the lyophilized active ingredient (Somatitribove zinc) have not been effective in preventing reoccurrence. In five instances (2 for 2001, 1 for 2002, and 2 for 2003) the organism was identified as Propionibacterium acnes; Staphylococcus species have been identified in three instances and in one instance (in 2002) Bacillus pumilus was found. Propionibacterium was found in environmental samples of the manufacturing areas. Batches manufactured around the same period of time and under the same conditions of the affected lots have been released to the market."

### OBSERVATION 2

"Equipment for adequate control over micro-organisms is not provided when appropriate for the manufacture, processing, packing or holding of a drug product."

As Jeff Goldblum said to Geena Davis in the classic horror film, *The Fly* (1986): "Be scared, be very scared." The first attempt to produce a new food by pretending to understand God's genetic code resulted in a new kind of milk, supersaturated with powerful growth hormones. FDA lied to America, claiming that milk had not changed. That was the beginning.

It has been well reported that a new emerging species of bacteria has developed, immune to antibiotic treatment. *Staphylococcus aureus* plagues many American hospitals in this new outbreak. Could the etiology of the mother of all deadly staph infections be traced to a new genetically engineered version of staph, a superbug inadvertently produced by Monsanto and then introduced into the food supply? In 1989, such staphylococcus infections were unknown to hospitals. By 2002, nearly two-thirds of all hospital infections could be attributed to antibiotic-resistant staphylococcus infections.

A second bacterium on FDA's (once) secret report reveals that Posilac samples were found to contain *Bacillus pumilus*. This bacterium degrades cellulose. What would be the result of genetically engineering something that breaks down the heartiest of plant cells with a cow hormone? As my dear departed Grandma Ruth used to say, "God only knows."

A third bacterium found was identified as *Propionibacterium acnes* (P-acnes). What the heck is P-acnes? An Internet search revealed:

"P. acnes is the causative agent of acne vulgaris (pimples)... Other infections for which P. acnes has been implicated include corneal ulcers, heart valves and prosthetic devices, and central nervous

system shunts. A rare heart disease known as *Propionibacterium acnes* endocarditis has been discovered in a prosthetic valve infected with P. acnes. The valve was also complicated by multiple mycotic aneurysms." The world works in funny ways, but there is always balance. Monsanto's hormone will soon be off the market. FDA will allow Monsanto to withdraw their drug with corporate dignity. Posilac will soon take its own life and cease to exist.

Farmers will produce less milk. The price of milk and dairy commodities will soar, as they have been doing since the first Posilac shortage began. Cows will be less stressed as their udders shrink because they are no longer injected with high octane hormone fuel. The pus cell rates will mysteriously decrease. Farmers will be given credit for producing safer and cleaner milk.

And I? I'll be pointing my finger (guess which one) at the dairy industry, shouting: "It's hormones, stupid!"

All milk naturally contains powerful growth hormones. Even the healthiest organic milk from the healthiest cow. Thank you, Monsanto, for teaching me the basics.

Robert Cohen <http://www.notmilk.com> posted on the internet 5-22-4

## BGH Linked with Mad Cow

In the wake of America's discovery of mad cow disease (BSE) in its herds, author of the 1997 book *Mad Cow USA* John Stauber is being deluged with press calls. After all, Stauber predicted exactly this crisis as a result of the continued feeding of slaughterhouse waste to cattle - and the use of Monsanto's GE bovine growth hormone, rBGH.

"[around 1992] I got a call from a retired Eli Lilly drug researcher who told me that if rBGH came on the market in the U.S., we would be seeing mad cow disease," recounts Stauber. He didn't see the connection. The scientist explained: "If you inject cows with rBGH, you will have to feed them fat and protein supplements," because rBGH takes a heavy toll as it hikes milk production. Likely to be used, he said, would be "the cheapest form" of fat and protein: slaughterhouse waste. And this waste, the researcher said, would inevitably include parts of animals infected with mad cow disease - and the disease would be passed on. The use of slaughterhouse waste was how mad cow disease had spread in Great Britain and elsewhere in Europe in the 1980s.

Then Stauber filed a request under the Freedom of Information Act (FOIA) with the U.S. Department of Agriculture, obtaining a 1991 report that discussed the pros and cons of banning feed containing slaughterhouse waste: "The advantage of this option is that it minimizes the risk of BSE," it read. "The disadvantage is that the cost to the livestock and rendering industries would be substantial."

Stauber called a Wall Street Journal reporter who specializes in agriculture and told him of all this. The reporter said it was "a theoretical issue. Call me when they find the first cow" with mad cow disease.

Stauber told him: "They'll be calling me when they find the first cow."

<http://www.gmwatch.org/archive2.asp?arcid=3413>

## Livestock, from page 9

restrict management of the dairy animals prior to conversion. It's the regulation itself that is inconsistent.

### III. Guidance: Livestock Feed as a Protein Supplement in Livestock Feeds

The standards allow for the use of nonsynthetic substances as feed supplements for organic livestock. Fishmeal fits the definition of nonsynthetic (natural), as a substance derived from animal matter. So, fishmeal may be fed to organic livestock as long as it fits the definition of natural and its use is consistent with the definition of a feed supplement. The use of feed supplements is still limited to amounts needed for adequate nutrition and health maintenance for the species at its specific stage of life.

The NOP was recognizing that the seemingly odd practice of feeding fishmeal to organic livestock is consistent with the standards. To address concerns about possible contaminants in fishmeal being introduced to the diet of organic livestock, the regulation could be amended to prohibit feed supplements altogether, protein supplements in particular or supplements that contain specific contaminants.

### IV. Compliance and Enforcement

#### Directive: Pesticide Use

This Directive clarified how certifiers were to enforce the standard prohibiting the use of pesticides that contain list 3 inert ingredients in organic production. The EPA classifies inert ingredients contained in pesticides into four categories. List 3's are "Inerts of unknown toxicity", which have not been evaluated, while list 4's are "Minimal risk inert ingredients." Only list 4 inerts are allowed in pesticides to be used in organic production. Manufacturers are not required to disclose either what the inert ingredients are, or what EPA category (list) they fall under, so pesticide labels do not provide the information needed to determine if a product is allowed. It is difficult for certifiers and often impossible for producers to determine the status of inerts. The Directive allowed for a bit of leniency for growers who inadvertently or unknowingly use a pesticide with an approved active ingredient, but that contains a list 3 inert. Application of this Directive might have allowed some materials with List 2 or 3 inerts. The Directive did NOT, as some reports suggest, allow the use of unapproved active ingredients. It did not even [see NOP, page 23]



## Recent Minutes Highlights, from page 19

Treasurer Jack Rams presented a current balance sheet and budget vs. actual expense report for the first Quarter of 2004.

The Board will initiate a dialog with the Communications Committee with the goal of developing a statement on ethics for forum participation.

Members of the Board and staff are exploring possible avenues for providing ISO 9001 Lead Auditor Training through IOIA in the coming year.

The Board appointed Janine Gibson as Chair of the Canadian Committee. She replaces outgoing co-chairs Rochelle Eisen and Jim Hudson.

The Board approved funds for an additional contract for Lisa Pierce to do training development.

## May 20, 2004

Margaret Scoles presented the information available to date regarding options for ISO 9001 advanced training. Development of this course is still in the planning phase.

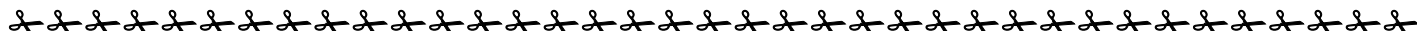
The Board approved allocation of funds for conference calls to facilitate the work of the Accreditation Committee and the Accreditation Review Panel.

The Board discussed member concerns regarding posting inspector employee announcements on the Forum. A decision was not reached, and this agenda item will be continued on the next Board conference call in June.

The Board expressed support for development of a collaborative grant proposal in response to the CSREES request for applications for projects related to organic agriculture.

Other agenda items for the June 20, 2004 BOD conference call include:

- Long-range Planning
- CAPS and IOIA Trainings



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- 2004 IOIA Membership Directory - \$25
- IFOAM/IOIA International Organic Inspection Manual:
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- Food Plant Sanitation and Safety, by Dr. Joe Montecalvo, 184 pp, \$50.00
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## 2004 Calendar

**June 10 through October 15**, Sustainable Agriculture Tours, one-day events sponsored by Agroecology/Sustainable Agriculture Program, University of Illinois, in locations across Illinois; for details, contact Deborah Cavanaugh-Grant, (217) 968 5512; [cvnghgrn@uiuc.edu](mailto:cvnghgrn@uiuc.edu); [www.web.aces.uiuc.edu/news/stories/news2695.html](http://www.web.aces.uiuc.edu/news/stories/news2695.html).

**June 12-20**, 9th Continental Bioregional Congress in North America, including workshops on sustainable agriculture, in Black Mountain, NC; contact (828) 669-7552; [biocongress2004@earthaven.org](mailto:biocongress2004@earthaven.org); [www.bioregionalcongress.org/](http://www.bioregionalcongress.org/).

**June 13-15**, "Agricultural Biotechnology: Finding Common International Goals," 16th annual public meeting held by National Ag. Biotech Council, in Guelph, Ontario, Canada; contact NABC, Cornell University, (607) 254-4856; [nabc@cornell.edu](mailto:nabc@cornell.edu); <http://www.cals.cornell.edu/extension/nabc>.

**June 14-15**, "2004 Triennial Conference-- Change in Rural America: Social and Management Challenges, Reports from the Frontline," sponsored by North Central Farm Management Extension Committee, Midwest Plan Service, and others, in Lexington, KY; contact Steve Isaacs, (859) 257-7271; [sisaaacs@uky.edu](mailto:sisaaacs@uky.edu); <http://www.ca.uky.edu/triennial/presentations.html>.

**June 21 – Aug 13**, Sustainable Ag & Organic Farming: Principles & Practices. Credited course, UC Davis. Info [mxvanhorn@ucdavis.edu](mailto:mxvanhorn@ucdavis.edu) or [www.studentfarm.ucdavis.edu](http://www.studentfarm.ucdavis.edu)

**June 24-25**, "Agriculture as a Producer and Consumer of Energy," conference organized by Farm Foundation and USDA's Office of Energy Policy and New Uses, in Arlington, VA; contact Steve Halbrook, Farm Foundation, (630) 571-9393; [steve@farmfoundation.org](mailto:steve@farmfoundation.org); or Joe Outlaw, [joutlaw@tamu.edu](mailto:joutlaw@tamu.edu); <http://www.farmfoundation.org/projects/03-35AgAsEnergyProducerAndConsumer.htm>.

**June 28**, "Organic Production: Information, Resources and Research," professional development workshop, in Springfield, IL;

contact Deborah Cavanaugh-Grant, Agroecology/Sustainable Agriculture Program, University of Illinois, (217) 968-5512; [cvnghgrn@uiuc.edu](mailto:cvnghgrn@uiuc.edu); [www.web.aces.uiuc.edu/pdo/display.pl?ProgID3D529](http://www.web.aces.uiuc.edu/pdo/display.pl?ProgID3D529).

**July 5-6**, "Consumers, Farmers and Food: Reconciling the Future," forum organized by Royal Institute of International Affairs and New Scientist magazine, with support from Institute for Agriculture and Trade Policy, in London, England; contact Dino Ribeiro; phone (+44-20) 7957-5753; [dribeiro@riia.org](mailto:dribeiro@riia.org); [www.riia.org/index.php?id3D5&cid3D55](http://www.riia.org/index.php?id3D5&cid3D55).

**July 9-10** and July 23-24, Polyface Farm Intensive Discovery Seminar, series of 2-day events at Joel Salatin family farm, in Swoope, VA; contact Acres U.S.A., 1-800-355-5313 or (512) 892-4400; [meetings@acres.usa.org](mailto:meetings@acres.usa.org); <http://www.acresusa.com/events/events.htm>.

**July 11-24**, "Agroecology of Tropical Zones: Integrating Agroecosystems in the Regional Landscape" is focus of 2004 International Short Course on Agroecology, to be held in Huatusco, Veracruz, and Cardenas, Tabasco, Mexico; contact Stephen R. Gliessman, University of California, Santa Cruz, [gliess@ucsc.edu](mailto:gliess@ucsc.edu); [www.agroecology.org/shortcourse](http://www.agroecology.org/shortcourse).

**July 13 –15**, California Conference on Biological Control IV: Biocontrol and Organic Production For more information contact: Lynn LeBeck ([llebeck@nature.berkeley.edu](mailto:llebeck@nature.berkeley.edu)) Tel. 559-360-7111. Watch the Center for Biological Control web site for further info, <http://www.cnr.berkeley.edu/biocon/>

**August 1-6**, "Lessons of Lewis and Clark: Ecological Exploration of Inhabited Landscapes," Ecological Society of America's 80th Annual Meeting, in Portland, OR; for information, <http://esa.org/portland/>.

**August 12-15**, Northeast Organic Farming Association's 30th Annual Summer Conference, in Amherst, MA; contact Julie Rawson, Conference Coordinator, NOFA, 411 Sheldon Rd., Barre, MA 01005; (978) 355-2853; [nofa@nofamass.org](mailto:nofa@nofamass.org); details will be posted at <http://www.nofamass.org>.

**August 23**, IOIA and Hong Kong Organic Resource Centre will co-sponsor Basic Organic Farm/Process Inspector training, Kowloon Tong, Hong Kong. See page 3 of this issue for details. For further info contact Ms. Sharon Chan at 852-3411-2384 or [sharonc@hkbu.edu.hk](mailto:sharonc@hkbu.edu.hk).

**September 10-12**, "Natural Patterns and Permaculture Principles: Ecological Design Workshop," two-and-one-half day workshop in Half Moon Bay, CA; contact Bioneers, (831) 338-1202; [agworkshops@bioneers.org](mailto:agworkshops@bioneers.org); [http://www.bioneers.org/rdi/eco\\_design.html](http://www.bioneers.org/rdi/eco_design.html).

**September 18-19**, 5th Annual Rocky Mountain Sustainable Living Fair, in Fort Collins, CO; contact Kellie Falbo, (970) 224-FAIR; [kellie@poudre.com](mailto:kellie@poudre.com); [www.sustainablelivingfair.org/about.html](http://www.sustainablelivingfair.org/about.html).

**September 19-22**, National Public Policy Education Conference, sponsored by Farm Foundation, in St. Louis, MO; contact Steve Halbrook, [steve@farmfoundation.org](mailto:steve@farmfoundation.org); [www.farmfoundation.org/nppecindex.htm](http://www.farmfoundation.org/nppecindex.htm).

**September 23-24**, IOIA Advanced Inspector Training, Great Falls, MT. see p. 3 for more details or contact IOIA at [ioia@ioia.net](mailto:ioia@ioia.net)

**September 28-October 1**, "Creating a New Vision for the Future," Latin American Soil, Food, and People Conference, co-sponsored by Ecology Action, ECOPOL, and EARTH University, in Costa Rica; for information, [www.growbiointensive.org/costa-rica-conference/index.html](http://www.growbiointensive.org/costa-rica-conference/index.html).

**October 1-7** IOIA and Hawaii Organic Farmers Association will co-sponsor Basic Organic Farm Inspector training, Kalopa State Park, Hawaii. See page 3 for details. Contact Kelly Lange of HOFA at 808-969-7789 or [hofa@hawaiiorganicfarmers.org](mailto:hofa@hawaiiorganicfarmers.org)

**October 6-8**, IFOAM Conference on Organic Coffee, Kampala, Uganda. For info, [www.organiccoffeeconference.org](http://www.organiccoffeeconference.org) or IFOAM. October 13-22, IOIA and NJ Dept of Ag will co-sponsor Basic Farm/Process Inspector training in Elmer, New Jersey in conjunction with Advanced Inspector Training. See page 3 for details.

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