International Organic Inspectors Association

THE Inspectors' Report

VOLUME 23 — NUMBER 4 — FALL 2014

IOIA Training Institute Receives 'Sound and Sensible' Funding

IOIA responded to the USDA NOP's Sound and Sensible organic funding initiative, **NOP Sound and Sensible Organic Certification Models and Outreach** and became one of 13 contractors funded to develop tools that lower barriers to certification for organic producers. Other contractors in the group include certification agencies, nonprofits, and organic service companies. The project has four major parts.

"What to Expect at Your Organic Inspection" – a video in English and Spanish language, will follow a realistic inspection of a diverse crop/livestock farm. This tool will be available for use in IOIA basic trainings and to certifiers to use for in-house trainings. The video will be widely available on public organic education websites for farmers, educators, NOP staff and ag service providers. The video will reduce the intimidation factor for non-certified operations and will be designed to engage and encourage non-organic farmers to transition to organic. It will also illustrate the educational value of an inspection.

A second outcome of the project is to develop a prototype Inspection Guide tool, which will be developed and designed to greatly simplify reporting requirements, particularly for diverse crop operations with livestock. A significant certification cost both in money and time is the preparation of the report. This tool will allow inspectors to focus more time on inspecting rather than reporting. It can also greatly increase consistency in the rigor of different inspectors and elevate the trust at the reviewer level that all critical aspects of the inspection were addressed. The comprehensive Inspection Guide clearly lists each relevant NOP regulation, what the inspector is specifically verifying, and what the inspector is required to report. The Exit Interview report could serve as both the Inspection Report and Exit Interview Document. It would focus on deviations from the plan, potential non-compliances/issues of concern, and further information needed. An attestation by the inspector would include, "This inspection was completed according to IOIA Guide 100.1", or similar. This project allows IOIA to introduce a Sound and Sensible tool and forward a concept currently used by few certifiers. The Guide is readily adapted to on-line, digital, and paper inspection documents. This tool will be based on the USDA NOP but could also be adapted to other organic standards.

See **Funding,** page 28

Notes from the Chair

By Ib Hagsten

IOIA Chair Ib Hagsten, left, with Gerald Hermann, Organic Services, Germany, at Expo East

It is cold and/or snowing in large portions of North America, yet there are still leftover inspections to complete. So, as we put on our insulated coveralls and trudge through the snow-covered stubble fields we are reminded of how nice it was to do the same activities in short-sleeved shirts a short time ago.

Near the end of last month I had several interesting opportunities to represent IOIA. **First by** attending the NOSB meeting in Kentucky, interfacing with several other organic inspectors, certifier staff, and NOP/NOSB

See **Notes,** page 4

IOIA Patron Membership Grows On The Strength Of A Rising Organic Sector

On the heels of our first Sustaining membership by WhiteWave Foods last year, we're thrilled to announce three new Patron members enrolled for 2015! Driscoll's Strawberry Associates, Hidden Villa Ranch and Mom's Organic Market have each generously recognized the value of professional organic inspection with dues of $1,000 annually. These new memberships should inspire others in the organic sector and will be helpful in sustaining our fund-raising efforts next year. We welcome these new Patron members to our growing membership community.

'Giving Tuesday' A Success!

To date, IOIA has realized $4545 from our GT campaign. There's still time to donate before the end of the year - it's easy thru our web-site, either a one time donation or monthly payments. Help us reach our $10,000 goal!
Click here to donate today!

The Inspectors' Report is the newsletter of the International Organic Inspectors Association. IOIA is a 501 (c)(3) educational organization. Our 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.
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Thomas Forrest - Holtwood, PA.
Michael Gerber - Lancaster, PA.
Johanna Good - Novato, CA.
Sanjay Kalra - Howard Beach, NY.
Sera Lean - Oliver, BC.
Stanley McInturf - Roseville, CA.
Jack Monsted - Baltimore, MD.
Brittany Moreland - Red Lodge, MT.
Tracy Noel - Marseilles, IL.
Melinda Roberts - Statesville, NC.
Will Rutherford - Bedford, VA.
Mike Smith - Fresno, CA.
Jan Swinton - Fairfield, IA.
Melanie Sylvestre - Vancouver, B.C.
Dennis Patrick Turner - Columbus, OH.
Linda Whitmore-Smithers - Starks, ME.

Pumpkins Are So Last Month – Don't Let Your Membership Expire!

As an IOIA member, you're part of a team making sure that "organic" really means organic. Organic certifiers, growers and processors depend upon our integrity as the market for certified organic goods and services expands. We know you'll agree that your work becomes more important with each passing year.
You should have received our reminder to update your Membership Directory and renew your dues in October. If you've already paid, thank you. If not, please contact us right away! Renewals can be processed on our web site but we're also standing by to take your call during normal business hours. We'll need to know by December 31st if you wish to subscribe to either *The Organic Standard* (inspectors only) through IOIA's group rate, the *Inspector Report* (all members) hard copy edition or both.
Important: The Membership Directory will be published in February and we do not print updates throughout the year so please modify your listing, as necessary, prior to the end of the year. For a printed copy of the 2015 directory, please reserve now. As usual, we'll publish the mini-directory as an insert to the Winter edition of the *Inspector Report* and make it available digitally to all members.
Honor the work you've done, the purpose we serve and the future we share. Please renew today!

On-Site Training Schedule – full details and applications at www.ioia.net

San José, Costa Rica, Farm Inspection Course – Spring 2015
IOIA and Eco-LOGICA will cosponsor a 4.5 day Basic Organic Farm Inspection training based on USDA NOP at ICAES, Coronado in Costa Rica in Spanish language. Please contact Sue Wei at ph.: (506) 4010-0232 or (506) 2297-6676, fax: (506) 2235-1638 or e-mail: swei@eco-logica.com for further info.

Advanced Inspector Training, Montana – March 26-27, 2015
IOIA will sponsor 2 days of advanced inspector training in conjunction with the IOIA Annual Meeting on March 28. All events will be held at Chico Hot Springs. Tentatively, gluten-free inspection training will also be offered. Field trip opportunities are being developed for Mar. 29.

Basic Crop and Processing Inspection Trainings, North Carolina – April 27-May 8, 2015
IOIA will sponsor Crop Inspection Training on April 27 - May 1, followed by Processing Inspection Training on May 4-8, both at the Mountain Lodge & Conference Center in Flat Rock, North Carolina. Application and detailed information will be available soon on the IOIA website. For more information about the venue go to, http://mountainlodgeflatrock.com

Fall Trainings: Crop/Processing, and Livestock trainings are under development in western Oregon and the Des Moines, Iowa area. Tentatively, Crop/Processing trainings are planned in Oregon and Crop/Livestock trainings in Iowa.

2015 WEBINAR TRAINING

go to: www.ioia.net/schedule_list.html

100 Level Webinar – January 7 and 9, 2015. NOP Processing Standards 8:00 a.m. - 11:00 a.m. (PST). Two, 3 hour sessions. IOIA Trainer: Stanley Edwards.

100 Level Webinar – January 13 and 15, 2015. COR Livestock Standards 9:00 a.m. - 12:00 p.m. (PST). Two, 3 hour sessions. IOIA Trainer: Garry Lean.

100 Level Webinar – January 27 and 29, 2015. COR Crop Standards 9:00 a.m. - 12:00 p.m. (PST). Two, 3 hour sessions. IOIA Trainer: Garry Lean.

200 Level Webinar – February 6 and 9, 2015. Livestock Feed Audits – grazing and non grazing season 9:00 a.m. - 11:00 a.m. (PST). Two, 2-hour sessions. Presented by Sarah Flack.

200 Level Webinar – February 18 and 25, 2015. In/Out Balances, Traceability Tests, and Recipe Verification for Crop Inspection under NOP and COR 8:00 a.m. - 10:00 a.m. (PST) Two, 2 hour sessions. IOIA Trainer: Monique Scholz

100 Level Webinar – February 19 and 26, 2015. NOP Livestock Standards 9:00 a.m. - 12:00 p.m. (PST). Two, 3 hour sessions. IOIA Trainer: Garry Lean.

200 Level Webinar – February 24. Biodiversity and Natural Resource Assessment on Organic Farms 9:00 a.m. - 12:00 p.m. (PST). One, 3 hour session. IOIA Trainer: Garry Lean.

100 Level Webinar – April 8 and 10, 2015. IOIA/COTA COR Processing Standards
9:00 a.m. - 12:00 p.m. (PDT). Two, 3 hour sessions. IOIA Trainer: Kelly Monaghan.

300 Level Webinar – Spring 2015. In/Out Balances, Traceability Tests, and Recipe Verification for Processing Inspection under NOP and COR 8:00 a.m. - 10:00 a.m. (PST). Two, 2 hour sessions. IOIA Trainer: Monique Scholz

Notes, from page 1

members, (B) making a presentation related to (1) the new interest in greater depth of soil quality assessments by inspectors and (2) the continued use of sulfurous acid as an effective minimally-invasive soil improvement tool on arid soils.

Secondly, thru attending the Soil Science Association/American Society of Agronomy's annual meeting in California, it allowed me to give two presentations on soil quality improvements and new tools inspectors could use to improve soil assessments. In conjunction with that meeting, I also attended the international pre-meeting on organics, which allowed me to gain numerous new organic concepts. Some of the key concepts learned during the "Innovations in Organic Food Systems for Sustainable Production and Enhanced Ecosystem Services" two-day workshop were (in random order):

1. Four Pillars of the Sustainability Dashboard: Good Governance; Economic Resilience; Agro-Environmental Integrity; and Social Well-Being.
2. Entomovectors for biocontrol – Where insects can transport significant amounts of beneficial biocontrol organisms attached to their body hairs.
3. Biopore Systems – Where much beneficial activity can be attributed to crop rotation where large taproots and earthworm interactions unlock deep nutrients.
4. "Focus on: Where the hidden half of the crop meets the hidden half of the soil" – Where the intricacies of soil depth and root system architecture greatly improve productivity under low water and nutrient availability conditions.
5. We are adept at promoting soil life. But need to refine our goals as relates to this key linkage between organic farming and broader ecosystem services.
6. The principles of organic agriculture become a global reference for sustainability in agricultural and food systems due to evidence based on research and adaptive management.
7. Sustainable intensification – Is a productive agriculture that conserves and enhances natural resources by using an ecosystem approach that draws on nature's contribution to crop growth, like soil organic matter, water flow regulation, pollination, and natural predation of pest, and applies appropriate external inputs at the right time, in the right amount.
8. Water quality in organic cropping systems – Where the Nitrate losses were compared between conventional corn-soybeans and an organic multi-year rotation (corn/soybeans/oats/alfalfa/alfalfa). The results were 50% more N-loss in the conventional system compared to the organic system.

And, during a Q&A session I raised the question for the international panel, "How do we grow more organic growers?" – It seemed to really puzzle the "experts."

Thirdly, I presented two talks for new or prospective organic farmers at the 35th Anniversary of the Kansas Rural Center's Farm and Food Conference. Both of these talks, as well as the earlier-mentioned, carried the IOIA logo and gave credit to our premier inspector-training organization.

Lastly, allow me to tell you about the amazing IOIA BOD that you have as YOUR representatives. Since the same seven BOD members had been together for almost two years now, we decided that it would be imperative to have a two-day retreat to seriously evaluate how IOIA might improve the accreditation/certification/licensing of its well-trained organic inspectors. When our valued, conscientious treasurer, Pam, questioned if we had the funds for such a retreat, everyone agreed to pick-up the airfare for themselves. Suffice it to say, the BOD members came from California, Canada, The Midwest, and Korea all on their own nickels.

You need to come to Chico Springs, MT on March 28th to our 2015 AGM to get the specifics and help us "kick the 'raised bar' further down the road." Thank you very much for your dedication and sacrifice, dear board members, and to Margaret, our trusted Executive Director.

Respectfully, *Ib*

Ib with new NOP hire Robert Yang at Expo East in Baltimore

Notes from the ED

by Margaret Scoles

A few events this fall were:

September 18-21: Expo East in Baltimore. My sister, Dixie Stark, joined me. We both flew from different parts of MT and met up in the Baltimore airport. Also an ED of a nonprofit, she is quite good with fundraising and grant-writing. Those are both growth areas for me so she helps mentor me in both. She also helped staff the booth and was a Baltimore tourist otherwise. Ib, Dixie, and I all attended the OTA Annual Meeting and Awards Gala. I participated in the IFOAM meeting and attended OTA's sessions including the regulatory update. It was especially rewarding to have so many current and old members seek our booth out. The location was a little remote and less than ideal. However, it was a plus to be right next to OMRI, and several IOIA members, both former and current, sought us out.

Raymond Yang flew in from Korea to promote the Organic Expo in Korea, connect with colleagues and IOIA, and to visit his brother Robert. Raymond is an IOIA inspector member and the CEO of Organic Partner. Organic Partner promotes organic agriculture and products through trade shows, conferences, and other events. OP also assists in finding solutions for companies desiring to export their organic products or who plan to import to Korea. OP is the partner with Korea International Exhibition Co. for the INTERNATIONAL ORGANIC EXPO held annually at COEX.

September 28-Oct 6: Training in PA. An infrequent experience for me is serving as lead trainer for a basic course. Jonda Crosby and I served as the trainer team for the basic crop course. Then I facilitated the advanced course (2 days) and finally was just one of the participants in the gluten-free verification training.

Oct 23-25: A fast trip to Denver to join IOIA's hard working BOD for a working retreat. I was profoundly impressed by the BOD. They arrived from around the globe. Two flew in from Canada and one from Korea. Most were on inspection trips. They landed ready to work, and worked very hard for two days to breathe life into a new and more relevant inspector accreditation program. They were literally still working on the way to their airport shuttles. Lunch was brought in to save time. Even the evenings were semi-work, although very pleasant. We met for dinner one night with Fred Ehlert and his wife Sharleen. Fred is a long-time, newly retired inspector member of IOIA. Another night, we were joined by Kelly Shea of White Wave for dinner. Kelly is helping support and nurture IOIA's Fundraising Committee. And after that productive whirlwind of work, the BOD donated their airfares to IOIA and agreed not to request reimbursement. IOIA has never had a more giving BOD. Please watch for a full report on the details of the BOD working retreat in the next issue! I'm opting to give my space for "Notes" over to photos of those who stopped by our booth at the Expo in Baltimore. In every photo, you will see our welcoming IOIA Board Chair, Ib.

Volunteer Dixie Stark and visitor Renee Gebault King, one of the newest NOP staff and a former IOIA inspector member. Renee is a recent PhD in Soil Science from the University of Wyoming, so she enjoyed discussing soil assessment on organic farms with Ib.

November 5-20: Trip to Australia – trip of a lifetime. My husband and I went on a combination work/vacation trip to Australia. After a few days of work, ending with the NASAA advanced training near Adelaide, we took a 40th anniversary holiday. We drove more than 5000 km in a rental car through New South Wales and South Australia including Kangaroo Island. No room for pictures of kangaroos or the opal fields in Coober Pedy in this issue, sadly. A most profound experience was going on a walk on Kangaroo Island with volunteers to count little penguin chicks. Once hunted almost to extinction, New Zealand fur seals are making such a come-back that they are decimating the little penguins, which are the smallest of all penguins.

Seasons Greetings!

IOIA's 2015 Annual Meeting in Montana – IOIA's first in "Big Sky Country"!

Venue - Chico Hot Springs Resort, in Pray, Montana, is a cozy and historic hot springs resort in a rural setting located in the beautiful Paradise Valley just north of Yellowstone National Park. All pools are outdoors. Natural hot springs water averages 103°F (39.4°C) in the small pool and 96°F (35.5°C) in the large pool. Winter visitors often enjoy the novelty of soaking in the pools while the snow is falling. Recreational activities at Chico include horseback riding, snowshoeing, skiing, and full-day dogsled treks (advance reservations required). Winter will be waning by the end of March and snow is not guaranteed except on the spectacular mountains both sides of the valley.

Why are Stuart McMillan (Vice Chair, left) and Margaret Scoles (ED, right) smiling? Senator Jon Tester (center) has just confirmed that if his schedule allows, he will be IOIA AGM's keynote. All three were speakers at the MT Organic Association Conference Dec 4-6.

Events - The **Annual Meeting** will be Saturday, **March 28**. Senator Jon Tester of Montana, the only certified organic farmer in the US Senate (and the only active farmer) has been invited as keynote speaker. Senator Tester's work on behalf of small farmers was crucial as the FDA's food safety regulations were crafted. The AGM will include major membership issues including a new inspector accreditation program and the first AGM in Asia. Fun and festivities will follow the AGM, including music, dancing, and a **FUNdraising auction** with IOIA's favorite auctioneer and former BOD member Brian Magaro. It has been 4 years since IOIA's last auction, and Montanans love an auction. **Advanced training** is scheduled **March 26-27.** Agenda is under development with some concurrent sessions. Livestock topics will be included as a major section with another concurrent option for non-livestock inspectors. Members may sign up for one or more days of training. The Gluten Free Certification Organization has tentatively agreed to deliver **Gluten Free Verification Training** in conjunction with the event. **Field trip options** will be offered on Sunday, **March 29**. The modern but rustic Conference Center will be entirely available to IOIA and includes a cash bar for the AGM.

Distance to airports is about 2.5 hours to Billings, a major regional airport, or 1.5 hours to Bozeman. If driving, Chico is about 30 minutes south of the major interstate highway through Montana.

Field trip sites will include an organic goat dairy that produces cheese and organic pork and an on-farm wool processing operation on a ranch over 100 years old. Wes Henthorne, manager of the B Bar Ranch, has agreed to bring a slide show that showcases their Ancient White Park (heirloom) cattle - the largest herd of the breed in the world. The B Bar is distant for a field trip, especially in early spring. So Henthorne has agreed to bring his photos to tell the story of how the B Bar Ranch rescued the breed from near extinction, became certified organic, and created a local, organic, grass-fed market.

For more about the venue - www.chicohotsprings.com. For more information about Yellowstone Park www.nps.gov/yell/index.htm. For complete details about the AGM as the event develops, http://ioia.net/AGM.html In the interest of conserving space, this article has been abbreviated. Full details including speaker bios and draft agendas will be posted on the website, along with training application forms.

"WELCOME TO CHICO HOT SPRINGS, WHERE OLD MEETS NEW AND FRIENDLY WESTERN HOSPITALITY HAS BEEN A TRADITION SINCE 1900."

Bylaws Ballot Results and Nominations, Anyone?

The Bylaws Ballot extending terms for Board of Directors from 2 years to 3 years passed easily - greatly exceeding the quorum requirement. Thank you, IOIA Inspector members, for participating in decision-making! The next election will elect five directors. Some will fill 3-year terms and some 2-year terms to restore staggered terms on the BOD.

Now – to fill those positions, we need between 5 and 10 candidates. Nominations, anyone? IOIA Bylaws require that Board of Directors candidates be nominated at least 60 days prior to the AGM. If you would like to nominate someone or yourself, please email Chris Kidwell, Membership Chair, christopher.kidwell@gmail.com, before January 10, to allow adequate time for preparing ballots and biographical data. Each candidate will be asked to answer a few questions and submit a short bio. Candidates should be willing to participate in conference calls (typically once per 4-6 weeks), attend the Annual Meeting, and participate in fundraising. Members of the BOD must be selected from among Inspector members. The BOD positions up for re-election are currently filled by Ib Hagsten (Missouri), Margaret Weigelt (Minnesota), Pamela Sullivan (California) and the position left vacant by resignation of a BOD member. BOD positions not up for re-election are filled by Isidor Yu (Korea) and Stuart McMillan (Manitoba). To propose amendments to the Bylaws, submit a proposal to the IOIA office or directly to Al Johnson, Bylaws Committee Chair, at dajjorg@verizon.net. Plan to allow enough time for Committee review.

Ballots will be mailed out in late Jan/early February. Bylaws amendments and other ballots to be voted on at the Annual Meeting must be mailed out at least 45 days prior to the Annual Meeting, as per IOIA bylaws.

Plan to bring an item to the AGM in Montana for the FUNdraising Auction.

IOIA Auctions are part entertainment, part fundraising, and all FUN!

Brian Magaro will be showcasing his considerable auctioneering skills at our upcoming AGM. This event is always lots of fun, and it's made better by the items that people bring to auction. In the past we've had everything from t-shirts and hoodies to venison jerky, gift certificates and hand-crafted bat houses. Easy-traveling items are favored. And if you are unable to join us, consider sending something - the auction helps IOIA offset the cost of the AGM.

Inspector Peer Evaluations – A Brief Update

For background, please see the last issue of the newsletter and full article written by Al Johnson, Co-Chair of the Peer Evaluation Subcommittee of IOIA's Accreditation Committee.

A draft inspector peer evaluation tool was developed by a hardworking committee via conference call and GoogleDocs. Draft 2 was presented for discussion on the IOIA Certifier-Inspector Dialogue conference call in November. The concept has met with mostly positive feedback from certifiers. One goal is to create an alternative approach to the NOP's certifier instruction 2027 regarding personnel evaluations that the NOP would accept as an alternative to field evaluation of every inspector every year. Draft 3 is anticipated soon and will complete Phase 1 of the two-part process. In Phase 2 of their work, the committee plans to work with the IOIA Board to incorporate peer evaluations into the IOIA Inspector Accreditation Program. Criteria for evaluators are yet to be addressed by the group.

Sector News

Four New Members Appointed to NOSB

The new members will fill positions that are specifically designated to represent various sectors of the organic community. Their five year terms will begin on January 24, 2015.

Ashley Swaffer, Fayetteville, Arkansas, will fill the open producer seat on the Board. Swaffer currently serves as the Director of Special Projects at Arkansas Egg Company. Swaffer has been involved in all aspects of organic egg production at Arkansas Egg Company, including managing organic certification, managing all aspects of operations, and plant food safety audits. She holds a Bachelor's Degree in Poultry Science from the University of Arkansas.

Tom Chapman, Belmont, California, will fill the open handler seat on the Board. Chapman currently serves as the Sourcing Manager for Ingredients for Clif Bar & Company in Belmont, California. Chapman has worked in the organic industry for 12 years, and has demonstrated a robust working knowledge of the organic standards and principles. He has a Political Science degree from the University of California, San Diego.

Lisa de Lima, Gaithersburg, Maryland, will fill the open retailer seat on the Board. de Lima currently serves as the Vice President of Grocery for MOM's Organic Market, which sells only 100 percent organic produce. She has 16 years of experience in the organic retail foods industry. She holds a Master of Business Administration Degree from Johns Hopkins University, and a Bachelor's Degree in Environmental Studies and Political Science from the University of Vermont.

Paula Daniels, Los Angeles, California, will fill the environmental protection and resource conservation seat on the Board. Daniels serves as the Senior Advisor on Food Policy for Los Angeles, California, but she is currently on sabbatical to write and teach in the area of food policy. Previously, Daniels was a commissioner with the California Coastal Commission, served on the governing board of the California Bay-Delta Authority, taught food policy at the Institute of the Environment and Sustainability, and founded the Los Angeles Food Policy Council. Daniels hold a Juris Doctor Degree from Southwestern University School of Law, and a Bachelor's Degree in Broadcast Journalism from the University of Southern California.

NOSB Update

The October meeting of the NOSB was the first to fully implement the new Sunset provision since that rule change was announced in Sept 2013. Motions for materials on the National List are now made as a motion to remove from the list, rather than to retain them. Until the rule change a year ago, it took 2/3 majority to keep materials on the list. Now it takes 2/3 majority to remove them.

See **NOSB**, page 30

Oregon GMO recount begins in 19 counties

A hand recount of the vote on whether to require labels on GMO foods in Oregon was held in 19 of the state's 36 counties, according to the Salem Statesman Journal. It said all counties are expected to complete their tallies by Dec 10. Unofficial results showed the statewide referendum failed by just over 800 votes out of 1.5 million cast. Whatever the outcome of the recount, "the results will be significant," said the newspaper. If the initiative passes, Oregon will be the first state to approve GMO labeling by ballot. "If the measure fails, it will mark the fourth time massive spending by food corporations has defeated a voter labeling initiative," said the Statesman Journal.

A petition signed by more than 700 chefs and urging a federal GMO labeling law was delivered to Congress. Bills on both sides of the labeling issue are pending in the House and Senate. Iowa Sen Chuck Grassley told reporters no action was expected this year. "Then, it starts all over again next year," said Grassley. He says he leans toward a bill sponsored by Rep Mike Pompeo of Kansas to pre-empt state labeling laws.

FSMA Comments Due Dec 15

The deadline to comment on the Food Safety Modernization Act, FDA's proposed food safety requirements, is Monday, December 15, before midnight Eastern.
To comment go to:
www.regulations.gov
and search for FSMA.

Canada Organic News

Basic Processing Course in Canada

For the first time since full implementation of the Organic Products Regulation in Canada, IOIA offered the Basic Processing Course November 10-14 in Toronto. The co-sponsor, Canadian Organic Growers (COG) was responsible for promotion, registrations, and logistics. Monique Scholz was lead trainer, ably assisted by Bill Barkley. Fourteen participants attended, from the Yukon, British Columbia, Alberta, Saskatchewan, Ontario and Québec.

Jessica Praskey, a representative of Black River Juice Company, explains how the press works, to IOIA trainees.

"FARMING FOR THE FUTURE"

Organic Connections Conference November 5-9, 2014

Jonda Crosby represented IOIA at the Regina Organic Connections Conference and Tradeshow and staffed IOIA's booth. She also attended a Soils workshop on November 6 and visited with certifiers. She reported that five inspectors trained by IOIA came to the booth to express appreciation for IOIA's work. The training is held in Saskatchewan every two years.

The impressive list of speakers included IOIA member Dag Falck of Nature's Path. Keynote speakers included Dr. Gilles-Eric Séralini about why the way we produce and consume our food constitutes a social act. Dr. Séralini is professor at the University of Caen in molecular biology, and has published many international scientific peer-reviewed journals on the effects of GMOs and associated pesticides on health.

Guelph Organic Conference

IOIA has been a sponsor and exhibitor since 2001, when the IOIA Annual Meeting was held in Guelph in conjunction with the conference. Since 2008, IOIA has sponsored a booth in the main level of the conference, and frequently provides speakers or workshops for the event. Take a mid-winter break at the Guelph University Centre! For agenda and details, see www.guelphorganicconf.ca

Participants Comment on Processing Course in Mexico

Following are comments from the cosponsor-managed Processing course with trainer Luis Brenes in Uruapan, Mexico, July 28 - August 1st, 2014. Bioagricert was cosponsor.

"El curso me parecio muy bien, practico, tenaz y muy completo, me ha servido para desarrollarme en mi trabajo, y tener una mejor nocion de cómo aplicar la norma, la capacidad de el trainer Luis Brenes me parecio excelente pues conoce a fondo la materia y es concreto y conciso. Y se genero un ambiente de trabajo y aprendizaje muy agradable. "
Ing. Mariana Gonzalez Velazquez

"Fue un buen curso, se aclararon muchas dudas con respecto al proceso, la práctica en campo fue excelente porque entendí el trabajo de los inspectores y como evaluadora me enfoque en otros puntos para realizar una mejor revisión."
Gracias Luis por tu excelente curso.
Fiorella Ruiz Flores

"El curso de proceso que recibí por parte del Ing. Luis Brenes, de quien ya había tenido el gusto de recibir el curso de finca e insumos, fue muy interesante y complementario, lo temas fueron de gran interés, la práctica en la empresa de empaque de aguacate, donde con la participación en grupo nos dimos cuenta de todo lo importante que tiene la función de un inspector de proceso, de todo lo que implica y de todas las habilidades que se tienen que desarrollar para hacer un buen trabajo, donde incluye en gran mayoría el buen trato al cliente y donde parte fundamental es saber cómo tratar un factor de riesgo sin caer en la imprudencia, ni para crear pánico en el procesador.

"Aprendí que la función de un inspector en hacer una visita y reporte con los ojos, lupa y conciencia. me gustaría recibir un curso de ganadería. Sería para mí el Plus que necesito como profesionista. Agradezco a Luis Brenes todo lo aprendido, le envió un Cordial Saludo y agradezco a IOIA la oportunidad de aprender de las grandes personas que ahí laboran."
Ing. Sami Coral Ortega Cortés

"El curso - taller avanzado de proceso orgánico impartido por el instructor Luis Brenes está muy completo ya que contempla todos los puntos de norma sobre procesamiento de productos orgánicos y trata muy en detalle varios de los puntos medulares que se deben contemplar durante la inspección. Tanto el curso como el trabajo en campo fueron muy esclarecedores. "
Manuel Rodríguez Luengo

"Excelente curso es práctico y claro. Permite interpretar la norma fácilmente, en mi experiencia personal son tres curso que he tomo por IOIA (curso básico de inspección para fincas septiembre 2013, curso avanzado de inspección de grupos marzo 2014 y curso básico de inspección de proceso organico julio 2014).Adquieres conocimientos y herramientas que te facilitan realizar inspecciones de forma objetiva.

"Agradezco al instructor Ing Luis Brenes y a IOIA por los conocimiento que comparte y dejar claro el código de ética y conducto que debe mantener en todo momento el inspector. "
Saludos cordiales.
Gabriel Garcia

Los participantes del curso con el entrenador Luis Brenes , primera fila tercera de izquierda

IOIA Residue Sampling Webinar Training Improvements

IOIA takes our evaluations for all of our trainings very seriously. Based on training feedback, IOIA organized a working group of certifiers and inspectors on the topic of residue sampling. The group developed a draft "Residue Sampling Best Practices" document and identified two additional resources to add to the training. First, a sample letter which certifiers could use to give to inspectors authorizing them to take samples. And second, a sample collection form completed, as an example. As these documents are finalized, they will all become part of the resources for participants for the next training and part of the basic IOIA training program.

A second identified and key drawback to webinar training is the lack of hands-on practice. IOIA is addressing this by working with Scientific Certification Systems to create a sampling video to include in the training. Brandon Nauman of SCS is leading this part of the training development.

IOIA took a step forward with the 200-level webinar "Residue Sampling under the USDA National Organic Program" this year with a new partnership with the Organic Trade Association. Nathaniel Lewis, OTA's Senior Crop and Livestock Specialist, was the lead presenter. This training has its roots in a collaborative effort between IOIA and Washington State Department of Agriculture. While Lewis was working at WSDA, IOIA and WSDA had an agreement for Lewis to develop and present the IOIA residue sampling webinar training in 2013 and early 2014.

The IOIA/OTA webinar included two sessions. Day one, August 19, was hosted on the OTA site and Day two, August 22, was hosted by IOIA. Day one is also a free membership service for OTA members. To receive a certificate of completion, participants were required to attend both days of the training and pass a post course exam.

Special thanks to the working group: Zak Wiegand (OTCO), Rebecca Witty (CCOF), Brandon Nauman (SCS), Nathaniel Lewis (OTA), Patricia Kane (ACA), and Ib Hagsten (IOIA BOD Chair and inspector). Hagsten says that requests for him to take samples went up significantly after the change in NOP regulations mandated sampling at least 5% of all certified operations. Many inspectors express reluctance to take samples due to liability concerns. The general consensus of the working group is that taking a sample for residue analysis brings with it no more liability than any other inspector activity.

Next steps? IOIA and OTA plan to offer the next "Residue Sampling under the USDA National Organic Program" webinar training collaboratively again in 2015.

At OTA, Lewis provides staff support to OTA's Farmer Advisory Council, on-the-ground outreach to OTA's organic farmer membership community, and analysis of policy issues that affect organic crop and livestock producers. Nathaniel served as past Certification Coordinator for WSDA's organic certification program where he managed their material review program. His responsibilities included coordination of their periodic residue sampling program. WSDA's certification program has included a respected and robust sampling program over decades. A certified organic producer, Nathaniel and his wife, Melissa Barker, manage their own organic farm, producing vegetables and livestock.

IOIA/CCOF Basic Crop Inspection Training, October 27-31,
Cherry Valley, California was full to the brim with twenty-six participants.
The course was led by trainers Garry Lean (Ontario) and Karen Troxell (California), assisted on field trip day from Shannon Murphy as third group leader. Special thanks to the venue, 123 Farm who hosted two field trip groups and to Three Sisters Farm for hosting a third group.

IOIA & PCO Team Up to Co-Sponsor Organic Crop Basic Inspection Training in State College, PA September 29-October 3

By Christie Badger

What do you get when you put 18 widely diverse individuals in a room with two brilliant trainers, all of them passionate about farming and how our food is grown? Why, an IOIA Organic Crop Basic Inspection Training, of course!

I must admit, I was nervous to meet Margaret Scoles. I mean, she's a big deal when it comes to the world of organic standards and inspection, right? When I walked into the training room on Monday morning, I couldn't have been more relieved when Margaret introduced herself and in her very down-to-earth way made me feel welcome and comfortable. Within minutes, Jonda had us laughing and feeling much more comfortable in our own skin. Now it was time for the learning to begin!

Reviewing records during the farm tour.

Although separated by technology – Margaret with her use of a Microsoft product and Jonda with her dedication to her Mac – it soon became evident that their training styles were in harmony. The trainers were experts at bringing it all together. By afternoon break that first day, I was thinking, "Now it's all clicking!"

Although I'd heard that the 4 ½ day training experience would be "intense," I do not think I fully appreciated that statement until I was part of it. But it was so much more, as well. It was exhilarating and thought-provoking, a personal growth experience I will not soon forget. Jonda and Margaret used the experience and background of the entire class, getting everyone involved in sharing and teaching each other. The use of the detailed and practical biodiversity guides published by **Wild Farm Alliance** were invaluable. These provided real-life pictures for discussion to help participants learn on both an academic and practical level, striving to provide clearer guidelines on protecting biodiversity and wild habitats on farms.

In addition to the classroom work, a "real live (mock) inspection" was part of the learning experience on day four, perfect timing to put all of our new found knowledge into practice. More than an opportunity for us all to jump in and inspect, the tour provided the practical, hands-on learning experience that is so valuable and so often overlooked in the educational experience. Our trainers once again provided us with the tools to excel and supported us when we stumbled. Every one of us played a part in the inspection process, taking the lead in one area, while observing and learning in others.

PA Basic Crop training participants.

As a fellow attendee noted about our trainers, "You made yourself available almost 24/7 and made every effort to assist the attendees!" I feel confident that I speak for the entire class when I say thank you, Margaret and Jonda!

Many of you reading this have probably attended an IOIA training. If you haven't, I cannot encourage you enough to do so. One of my fellow trainees said it best, stating, **"IOIA training is the most thorough training conference I've ever been to."** I couldn't agree more!

The 10 day training event featured separate basic courses for crop, processing and livestock inspections, as well as an Advanced Training for experienced inspectors.

IOIA/PCO Basic Processing Inspection Course, State College, Pennsylvania.Sept 29-Oct 3. Luis Brenes, far right, served as field trip group leader and day 3 assistant to Garry Lean, who was lead Trainer for the group of 15 participants.

IOIA/PCO Livestock Inspection Training held October 6 – 10 in Pennsylvania Back Row: Emily Thomas (Certified Humane Farm Animal Care), Casey Rogers (Fertrell Co.), Jason Laney (ID Department of Ag). Standing L to R: Kenneth Koch (Independent Insp. MT), Garry Lean IOIA Trainer, Tara Scott (ACORN Organic, Canada), Johanna Good (CA Marin County Department of Ag), Linda Whitmore Smithers (Independent Insp. ME) , Johanna Phillips (ID Department of Ag), Jeff Leonard (Whitewave Foods), Christie Badger (Independent Insp. PA), and Jonda Crosby, IOIA Training Services Director.

IOIA/PCO Advanced Organic Inspector Training, Oct. 4-5, 2014, State College, PA

Eighteen participants came from the East Coast to the West Coast for one the most highly rated advanced trainings of recent years. Months of advance planning with Amanda Birk as the PCO contact were a key factor in the training's success. Cosponsor PCO made the training possible with about half of the participants coming from the PCO staff. Margaret Scoles, ED, was the facilitator for the training and presented on "Improving the Exit Interview", an outcome of an IOIA/ACA working group.

Advanced Training Presenters

Matthew Michael

Matthew Michael is the Director, Compliance and Enforcement Division at the National Organic Program in Washington, DC. He presented a very helpful **"Writing Inspection Reports to Withstand Legal Scrutiny".**

A few **informal notes** from Michael's presentation –
from the ED and trainer:

- The number #1 reason your report will end up in court is an appeal of an adverse action.
- Don't compliment the operator within the written report. Commendations and compliments in the report bring into question the inspector's objectivity.
- Reminder: 205.403(c) allows inspectors to inspect non-organic aspects of a mixed operation.
- Do not include extraneous detail that is not related to compliance. The NOP sees "lots of extraneous material in reports that shouldn't be there."
- Don't speculate on cause of compliance. Don't say, "The operator isn't able to comply because of ……."
- Do not make recommendations for action by the certifier.
- Do not give advice/consult.
- In one appeal, an operator said the inspector gave them erroneous advice on how to comply. If inspector does give a tip, they should include it in the report.
- Don't suggest changes to the OSP that would bring them into compliance.
- Don't sympathize with the operator.
- Never make any sort of judgment.
- Provide enough detail. A vague report probably won't stand up in court.

Steve Ross

Steve Ross, from the National Assessment Services, USDA, AMS, LPS, Quality Assessment Division, presented "Good inspections vs Poor inspections" based on what the NOP auditors observe during witness inspections.

Steve supervises a group of 15 lead auditors who conduct audits/inspections for a variety of USDA Programs. Steve and his group have conducted audits on behalf of the NOP for the past 12 years which has included auditing all the NOP accredited certifying agents. He was a USDA Commodity Meat Grader before switching career paths to become a lead auditor and acquiring ASQ Certified Quality Auditor status.

A few **informal notes** from Ross's presentation – also from the ED and trainer.

- Try to inspect when the organic product is being run. If the plant is not running – likely the case would never make it to court.
- NOP takes the pest control hierarchy in 205.206 and 205.271 seriously. NOP auditors find that inspectors often fail to include detail on whether the hierarchy is followed.
- Make sure that all potential non-compliances make it into the Exit Interview document.
- Inspectors are often not given the time to do a good inspection or take the time to do a good inspection. The "normal" time an inspection takes according to past reports vs. what the auditor sees during witness audits are quite different. Auditors often see their witness inspections take much longer than the previous inspection.
- Keep inspection notes for a reasonable length of time. Don't discard immediately.

Sarah Flack, at left presented "Livestock Feed Audits – Grazing and Non-Grazing Season - in a Multi-species System" a half-day workshop at the **Advanced Training** that was evaluated very positively. An experienced inspector from Vermont, she has a diverse background in sustainable agriculture, which includes both on-farm and academic experience. She is nationally known for her public speaking, workshops, books and numerous articles on a range of agricultural topics. Her current work includes writing, public speaking and consulting with farms and organization to help farmers transition to new methods of farming including grass based, diversified, and organic. She is the author of Organic Dairy Production, co-author of The Organic Dairy Handbook - a comprehensive guide for the transition and beyond and co-author of Transitioning to Organic Dairy - a self assessment workbook, as well as many articles on farming and food. She is also the presenter for IOIA's 200-level webinar Livestock Feed Audits – grazing and non-grazing season". Jonda Crosby added to the session her simple but greatly appreciated quick calculation tool for calculating feed consumption by different species. She developed it in her previous experience as a certified organic handler of livestock feed.

George Lockwood, California, at left, presented Organic Aquaculture. George is a pioneer in aquaculture as well as organic aquaculture. He formed his first fish farming business, Monterey Abalone Farms in 1972 to domesticate abalone. He then combined abalone production with sea urchins, salmon and oysters in a unique integrated system that includes culturing various species of micro and macro-algae for feed. In 2005 he was named chair of a 12-member Aquaculture Working Group appointed by the Secretary of Agriculture to assist NOP and NOSB in the development of organic aquaculture. In 2010, after close consultation with NOSB, final recommendations were advanced to NOP. And now a proposed NOP organic aquaculture rule is expected soon. George is a past president of the World Aquaculture Society and a founder and several term president of the California Aquaculture Association.

Luis Brenes, at left, was a double presenter. He teamed with Margaret Scoles on "Improving the In-Out Balance for Processing Operators, Inspectors, and Certifiers" (where he was declared brilliant by the entire group) and "Grower Group Inspection and Certification". **Brian Magaro**, experienced poultry inspector assisted him in showing how the concept of grower groups could be applied to contracted poultry production, especially in the development of internal control and monitoring systems. With 18 years of experience as an accredited organic inspector, Brenes has audited farms and food processing facilities throughout North America, Latin America, the Caribbean, and Asia. He developed the IOIA webinar on Grower Group Certification and Inspection, has delivered training on this topic for IOIA, and has extensive experience inspecting and consulting for grower groups.

IOIA and GFCO launch Gluten-Free Verification Training

By Margaret Scoles

Sara Boswell, second from left, with Gluten-free training group.

Sara Boswell, Quality Control Manager of Industry Programs for Gluten Intolerance Group of North America (GIG), presented IOIA's first gluten-free verification training on October 6 in State College. I was one of seven participants. Prior experience in advanced auditing was prerequisite, so experienced organic inspectors were a good fit for this course.

Gluten Free Certification Organization (GFCO) is the largest 3rd party gluten-free certification program and is a program of the Gluten Intolerance Group. Increased awareness of gluten-intolerance has led to a very rapid growth in the demand for verifications and thus created the need for more auditors. Another factor in the growth is the date of Aug 5, 2014 for full compliance with FDA's definition of gluten-free.

Annual inspection is required for GFCO certification. Higher risk facilities may be inspected more often. Only certified operations can use a "Certified Gluten-Free" statement. However, dissimilar to organic labelling, "gluten-free" is a voluntary label claim. The FDA definition of gluten-free is <20 ppm gluten. No testing is required to use the gluten-free label. The GFCO tolerance is lower (10 ppm for ingredients and finished products) and sampling/testing is mandatory. Gluten-free inspectors must be prepared to collect samples as part of the audit.

The course included an overview of gluten-free lifestyle (who needs GF for medical reasons; others who use a GF diet); overview of what gluten is, where it is found; FDA regulations; USDA and TTB; the GFCO Certification process; the role and relationship of the inspector to GFCO. The greatest difference between the typical organic inspection and a GFCO audit is that there are no standards to audit to. This was perhaps the hardest aspect of the audit for organic inspectors to absorb and accept. Specific control points in grain mills were covered as well as training on the use of the audit report form.

Evaluations were quite positive. From the participants' perspective, the training was extremely well-done – highly qualified presenter, understandable, delivered in just one day, and affordable (just $200 for inspector members, $225 for non-members). And all participants were guaranteed work. As the presenter, Boswell was equally pleased. She expressed delight with the group of potential auditors who already understood and practiced good auditing protocols, knew what HACCP and SSOP meant, and were experienced at assessing risk. Although advanced inspectors aren't often accustomed to taking tests at the end of the day of training, everyone did well and passed on to the next step. Witness audits must be completed with an experience auditor before we will receive inspection assignments. Those audits are paid at a lower rate than usual audits. How often do organic inspectors get paid to be trained or guaranteed work?

Next training? IOIA and GFCO tentatively plan to provide the same training opportunity in conjunction with the AGM in Montana. Note that GFCO reviews applicants and must approve the final participant list. Participants are required to sign a 'no-compete' clause for gluten-free verifications, and an auditor work agreement.

The primary mission of GIG is education. GIG is a non-profit dedicated to support persons with gluten intolerances, celiac disease, dermatitis herpetiformis, and other gluten insensitivities through consumer and industry services and programs. Education focuses on the health risks of gluten-tolerance and how to avoid gluten in the foods one selects to eat. One in 133 people have celiac disease, although it is often misdiagnosed or not recognized. Herself a celiac, Boswell is a very dedicated advocate for rigor in the certification process. For more info about gluten intolerance, see https://www.gluten.net

IOIA Down Under

Nineteen participants, with Debbie Clarke, NASAA Inspection Manager, and Margaret Scoles, trainer for the workshop, in center.

IOIA provided IOIA/NCO NOP Standards Update as a workshop for NASAA on November 11 in Hahndorf, a picturesque German town in the Adelaide Hills, South Australia. The workshop included one-half day of NOP regulatory updates, plus training on the topics of in/out balances in processing, exit interview, and organic control points. The following morning, IOIA and NASAA collaborated on an interactive report writing session. How much detail is too much in a report? How much is not enough? How to be clear, complete, and concise? Do inspectors cite non-compliances or potential non-compliances? The participation of the NASAA's Certification Officers and the mix of reviewers and inspectors greatly enhanced this session. Training materials for the in/out balance session were based on the 100 and 200-level audit trail materials used in IOIA processing courses and webinars, including a standardized reporting format.

A group of inspectors from Australia and Tasmania relax after three days of training outside the Hahndorf Mill Inn. IOIA contributed pizza from a local pizzeria up the street. Julie Walsh, IOIA inspector member (center).

Australia has a national regulation only for export and no equivalency arrangement with the US. Private certifiers each have their standards. With no equivalency, each certifier must undergo NOP accreditation in order for their certified operators to export to the US. Currently four certifiers are NOP-accredited. IOIA has provided training for all four within the last two years, via both in-person and web-based formats. IOIA is especially in demand for NOP update training. Most other training in Oz happens in-house, although many of the inspectors are independent contractors. Margaret Scoles traveled to South Australia previously for NASAA training in 2010. Stanley Edwards trained for Aus-Qual in 2013. Scoles says that one of the best things about doing NOP update training about every two years is that it requires reading every update herself. "It is the best way I know to keep informed – teaching it!" This visit gave her the chance to catch up with old friends, many of whom have been inspecting 20 years or more, and discuss the issues of interest to inspectors – How to be more effective with time? How much to charge? What are the best new technology tools? How to schedule without going crazy? Australia has major mileage between operations and some massive certified operations that represents a lot of travel for inspectors. Australia also remains #1 in the world as the country with the most organic acreage.

Left: Maheswar Ghimire (Nepal) and Fang Wang (NASAA staff, originally from China) working out processing in/out balance exercises. The group used an IOIA in/out balance format and discussed reporting formats. Certification officers generally preferred a standardized reporting format, even if it took more paper and more pages. They found it easier to review.

A Biosecurity Primer for Organic Inspectors

by Tony Fleming

Biosecurity is a wide ranging topic that, for purposes of this article, refers to a collection of site-appropriate protocols and procedures designed to minimize the transmission of pathogenic agents. With the recent reemergence of the Ebola virus in West Africa and beyond, the term has taken on a renewed sense of urgency in both the media and in the public mind. While organic inspectors are unlikely to ever encounter the kinds of extreme precautions needed by those on the Ebola front lines, biosecurity considerations for organic inspectors nevertheless have significant implications, particularly in certain regions or at certain times when the incidences of highly pathogenic (HP) disease strains are high among inspected facilities or their environs. But even beyond the realm of novel HP outbreaks, myriad pathogens are commonly present at low to moderate levels in soil, crops, livestock herds, poultry flocks, and the general environments around inspected facilities, sometimes including the people who manage the facilities. While some of these more familiar diseases can also be HP, many are low pathogenic (LP) diseases; by definition, they often produce sub-clinical to mildly debilitating effects on the affected population, but are rarely lethal and are sometimes less readily transmissible. LP strains are nonetheless undesirable, since they typically cause economic damage by reducing productivity and undermining the general welfare of the animals. Thus, the fundamental goal of biosecurity is to curtail the transmission of all types of pathogens, both from facility to facility and within a given facility. This article briefly summarizes typical modes of pathogen transmission, and suggests several practical biosecurity measures organic inspectors should follow to minimize risk to both themselves and inspected operations.

Transmission of Pathogens: In 2004, an outbreak of avian influenza (AI) affected the poultry industry in the Fraser Valley of British Columbia. Many flocks, both conventional and organic, were impacted by both the disease itself and the regulatory response, resulting in severe economic losses to producers and the decimation of the regional industry. This event occurred on the heels of the 2003 SARS pandemic and at the height of concerns by the North American poultry industry and health authorities that the deadly H5N1 bird flu virus could soon reach this continent from Asia. At the time, much less was known about either the genetic makeup of AI and its various strains, or its modes of transmission, and many ill-informed observers quickly jumped to the (now discredited) conclusion that this and other AI viruses were transmitted to domestic flocks during outbreaks by wild birds, notably migratory waterfowl.

"Organic inspectors should be above reproach in following all biosecurity regulations while on inspections." - fruit fly quarantine in the Riverina, southeast Australia.

In fact, retrospective analyses of this incident and several similar ones around the same time strongly suggested that the rapid spread of the virus was actually attributable to so-called horizontal transmission between producers via such vectors as personnel moving between houses, service vehicles, and other routine farm-to-farm traffic. Considerable horizontal transmission may have occurred during the early stages of the incident, before any comprehensive awareness existed of a major problem unfolding. It also turned out that the particular highly pathogenic AI virus responsible was not the dreaded H5N1 of Asian origin, but one called H7N3, which is indigenous to North America. The ultimate origin of the outbreak has never been conclusively established. This particular strain may have lain dormant for decades, or it could have evolved (mutated) more recently from some other strain.

There are literally dozens, it not hundreds, of pathogens documented to affect crops, livestock, and people on farms. While novel HP diseases like AI and Ebola grab the headlines and help focus attention on the overall subject of emerging diseases, well-established disorders such as tobacco mosaic virus and early blight on crops, and campylobacter and bovine viral diarrhea in livestock are far more pervasive in the farm environment, and thus are the ones we, as inspectors, should be most aware of. Pathogenic organisms can also be problematic for certain kinds of processing operations that depend on microbial action to transform the product.

The environmental behavior of pathogens is often species specific, resulting in different rates and modes of transmission among various pathogens, even those in the same family.

These differences can be caused by a number of factors, such as genetic variation among hosts and pathogens, the relative abilities of different pathogens to survive outside their hosts, and the environmental conditions particular to a given site or bioregion. It isn't feasible here to cover the life cycles of even a fraction of the potential pathogens that might potentially be encountered. Instead, the following simply summarizes the most common modes of pathogen transmission we need to be aware of and can then direct our personal biosecurity efforts towards.

With respect to novel pathogens, like AI, the British Columbia experience offers some important takeaways that can be applied more broadly. First, basic evolutionary biology makes it very likely that indigenous HP strains of a variety of pathogen species exist in every region of the world. These indigenous diseases pose a much larger risk of infecting local and regional crops and livestock than do exotic diseases. In the BC case, the virus itself seemingly appeared out of nowhere from a local or regional source, while everyone's attention was focused on AI events and strains on the other side of the world. To date, there has not been a single H5N1 outbreak in North America; in fact, the only confirmed human case on this continent occurred earlier this year, in an individual recently returned from China after having had direct contact with infected persons and poultry. Thus, unless you or someone close to you has just returned from Asia, your preparatory efforts are best devoted to understanding the behavior of pathogens that are already well established in the locale where you are inspecting.

Second, organically managed livestock are susceptible to the same diseases that affect conventionally raised livestock. How much more or less susceptible is a subject of intense debate and disagreement—for example, some organic poultry producers maintain that AI is spread by the complex networks of trade in birds, feed, and services that define large conventional confinement operations, and by the nature of the operations themselves, where stressful conditions lower the birds' immune response. On the other hand, many large commercial operators and poultry associations are inherently critical of free-range and organic operations (the term "backyard flock" has taken on a derogatory tone in some circles) and strongly believe that the regular exposure of such birds to the general environment puts them at great risk for acquiring and spreading AI or other pathogens to all flocks in a particular area.

To a disinterested observer, these conflicting positions can seem more like opinions based on ideology than hard fact. Neither one is conclusively supported by the scant empirical evidence available, which points up the need for larger and better designed studies. And lumping all such "backyard flocks" together in the same category is a dubious proposition: a reasonable assumption is that rugged, old-line poultry breeds that have evolved under free range conditions may be inherently less susceptible to at least some endemic diseases, as compared to organic flocks composed of the standard conventional breeds ("floor birds") typically raised inside a house. In any case, no breed or method of production is 100% foolproof, and organic livestock and poultry can and do contract the same pathogenic diseases that afflict their conventional counterparts.

Third, the evidence that wild birds (especially migratory waterfowl) are a major vector for domestic poultry diseases is not convincing, at least in the case of AI, which probably is the most studied pathogen in this regard. For example, a number of observers have pointed out that the patterns of AI outbreaks in poultry closely follow highways, railroads, and other major trade routes for the poultry industry, while diverging sharply from known migratory flyways. A limited number of studies of wild birds have also found the incidence of AI to differ from what would be expected if wild birds were the main vector in an outbreak, and some analysts have even suggested that the pattern may be the other way around: namely, wild birds contract AI from domesticated poultry. Likewise, the relationship between wild birds and other common poultry diseases is difficult to validate; much evidence suggests that ducks and some shorebirds act as a reservoir for some of these diseases, though the link proving transmission to poultry flocks is tenuous. Most health authorities now acknowledge the tenuous link between wild birds and disease transmission to domesticated poultry, perhaps summarized most succinctly in a fact sheet published by the BC government (see references). But arguments about the role of wild birds are a bit like rearranging the deck chairs on the Titanic: regardless of the direction of transmission, the most protective approach for both groups is to minimize contact between domesticated poultry and wild birds.

It is virtually certain that outbreaks of AI and other novel pathogens will affect domestic poultry in the future, further stoking the acrimonious debate between conventional poultry producers and proponents of alternative production methods. As inspectors, it is important to keep an open mind and not get caught up in either the partisan debate or one's own biases about these crucial but incompletely answered questions. What the BC outbreak, as well as other situations, *unequivocally* demonstrate is that, once established,

See **Bio Security**, page 20

Bio Security, from page 19

a pathogen is spread largely by horizontal transmission (i.e., routine traffic) among the same flock or facility, as well as between geographically isolated flocks and facilities. This is not difficult to understand when viewed in the context of pathogen life cycles and the environmental conditions typically found at most farms, and it applies to crop disease as well as to livestock. Here are just a few examples.

Tobacco mosaic, for example, is a viral disease that affects members of the nightshade family. Although it can be introduced through contaminated seed and plants, it is most often introduced and spread by direct contact with crops after handling tobacco plants or material. Tobacco mosaic primarily survives and reproduces in tobacco, ergo, keeping tobacco and users of tobacco products off of vegetable farms is an obvious solution.

One of the most serious poultry diseases is caused by campylobacter, which transmits readily to mammals, including humans, where it causes dysentery and other severe but usually short-lived and non-life-threatening symptoms. Campylobacter is a major problem in North American store-bought poultry (and a major target of food safety surveillance) because it is so pervasive in poultry flocks. Surveys published by USDA, Consumer Reports, and others indicate that campylobacter is often present at lower levels in organically raised poultry, but present nevertheless. Campylobacter is representative of many diseases that are transmitted mostly or entirely via feces, and while the bacteria inside the host typically die out when the host dies, the disease can remain viable for months in moist poultry litter as well as in wet or moist areas (e.g., water bodies, puddles, and mud contaminated with feces). Breaking the lifecycle of this pathogen is one of the main aims of whole flock management, a widely utilized practice involving the complete between-flock cleandown and disinfection of facilities along with a several week rest period when no birds are present.

Most of the common cattle and hog pathogens are also spread through feces (watch those cow patties, folks). Thus, anything or anyone that contacts the manure of an infected animal immediately becomes a potential vector. The aforementioned bovine viral diarrhea is a good example. Hogs can also act as alternate hosts for a number of poultry diseases, including AI.

A few diseases can become airborne and spread directly from animal to animal. This is mainly true of flu and flu-like viruses (AI is one of them) where the virus is present in mucous secretions. This mode of transmission is relatively difficult to achieve because the large size of droplets typically secreted by infected animals does not allow them to remain airborne for long.

Finally, many plant disorders produce spores that are spread via dust. Mosaics, blights, anthracnose, leaf spots, molds, and several others typify this mode of transmission. While wet conditions may increase the susceptibility of the host plants to some of these diseases by helping the spores stick and become affixed, most of their horizontal transmission really occurs in dry weather, when the wind easily picks up and distributes the spores.

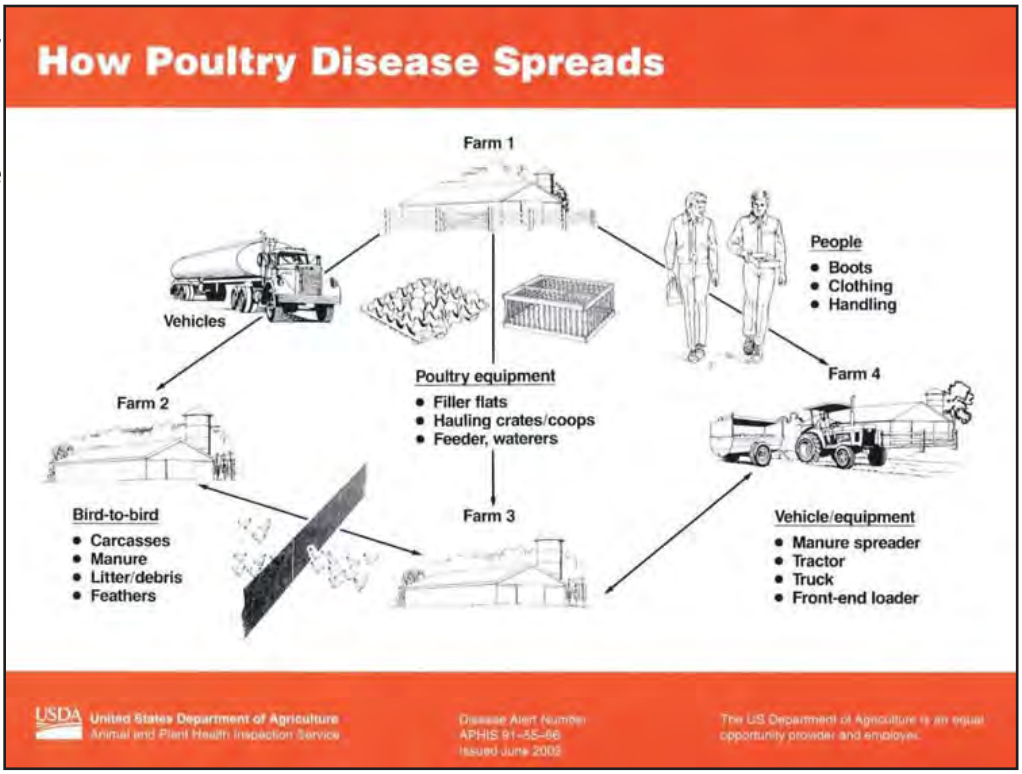
Biosecurity Best Management Practices for Inspectors

Biosecurity can seem like a complicated subject, given the large number of potential pathogens and their sometimes mysterious and poorly understood lifecycles and modes of transmission. But practicing effective biosecurity while performing inspections need not be a costly or complicated task, nor does it require a phD in pathology: clear communication with the inspected party, taking a few simple precautions (some of which you probably do anyway), and carrying a few commonly available materials and supplies are often all that is needed to significantly reduce the risk of transmitting pathogens while minimizing your own liability as a visitor to biosecure facilities. The following list of biosecurity best management practices is very broadly organized in order of precedence, with the most critical items first, followed by other items that may be needed on a case by case basis. Because there are a limited number of protective actions for visitors that are both practical and effective, the list looks a lot like the biosecurity guidelines found on innumerable websites operated by government health and agriculture agencies, trade associations, and individual health experts.

1. Be fully informed about the biosecurity program of the inspected party. Clear communication with the inspected party before the inspection is essential. When you set up the appointment, ask about current disease issues and conditions that are or have been present, both within the inspected operation and in their region generally. The operator will be familiar with what pathogen problems the operation has experienced previously, the specific kinds of disease risks that generally exist in the region, as well as what, if any, diseases are currently active. At that point, you may find it helpful to do some additional homework to learn the basics about those pathogens. Most importantly, the operator can detail the biosecurity steps they take to deal with these issues and what their expectations are of visitors.

2. Follow the biosecurity protocols of the inspected operation. You will undoubtedly find that biosecurity protocols (and philosophies) differ widely among organic operations, even within the same industry. The biosecurity program for a large livestock company or processor is likely to look very different from that of a small, diversified farm with a few head of beef cattle. For example, some large, vertically integrated poultry companies have explicit protocols for visitors, which may include restricting access by people who have recently had contact with other flocks outside of the operation. In this regard, it is appropriate to alert the operator if you are regularly in contact with other livestock herds/flocks (e.g., your own, a neighbor's, etc) and whether you have or will be inspecting other, unrelated livestock operations just prior to your visit.

On the other hand, other large operations may be less concerned about the histories of visitors and instead emphasize internal biosecurity practices that rely chiefly on protective gear (see below), foot baths, and employee hygiene and training. Operations with pasture-based livestock may emphasize a completely different set of protocols. And in a few instances, there may even be no explicit biosecurity measures in place. Regardless of whether the measures are simple or elaborate, following the inspected party's biosecurity protocols will not only help reduce the risk of transmitting disease, it will minimize the inspector's liability. Make liberal use of footbaths provided by many livestock operations and processors. If possible, walk through a footbath right before leaving.



Simple flow diagram illustrating common modes of horizontal transmission of poultry disease. The same basic idea is readily applicable to most other common pathogens found on farms.

3. Verify that the operation will be providing any required or recommended protective gear, or whether you need to provide your own. Virtually every operation that requires such gear will provide it to authorized visitors, but there may be exceptions. The kind of protective gear is often site- and operation-specific, and chosen to protect against known risks. Many livestock operations, including virtually every commercial poultry operation, provide disposable shoe covers ("booties") to visitors to prevent manure and bedding from being tracked from site to site. Some may also provide Tyvek coveralls to protect against air- and dust-borne pathogens; this is also common at certain kinds of processing operations where sensitive cultures are involved. Head covers (and, occasionally gloves) are usually *de rigueur* at processing plants, but are also deployed at some poultry operations and other livestock facilities.

4. If you frequently perform livestock or processor inspections, carry shoe covers and at least one set of protective outerwear. You might encounter situations where protective garb isn't provided by the inspected party, yet seems appropriate based on the situation. Many small farms may not require or provide protective gear, however, your feet will very likely be in contact with manure and bedding, a potential source of pathogens that can be tracked from farm to farm as you make your rounds; buffers or naturalized areas containing the seeds of invasive weeds and shrubs are a related consideration. Taking the very simple and inexpensive step of wearing disposable shoe covers will greatly minimize the chances of the inspector acting as a vector—if you have a supply of shoe covers on hand. And it is much simpler to deal with used shoe covers (bag them up and throw them away) than it is to have to clean and sanitize the deep lugs of the rubber boots you are probably wearing (see below) after a rendezvous with fresh cow

See **Bio**, page 22

Bio, from page 21

patties or poultry litter. In addition to a box of shoe covers, other useful protective gear includes one or more Tyvek coveralls, head nets/covers, disposable gloves, and a simple dust mask. All of these items are readily available from building supply stores, farm stores, and online.

5. Carry a wire brush, a soft nail brush, and a spray bottle of sanitizer. These are indispensable for cleaning off and disinfecting shoes, clothing, and other personal effects that end up getting soiled on an inspection, despite your best efforts to stay clean. If soap and water may not be available on site, such as in a remote rangeland, a bottle of liquid soap and an extra jug of water will come in handy for washing up. If your shoes have picked up mud or manure from a livestock area, expect to spend some time doing a thorough cleaning before leaving for your next appointment. Simply spraying them with sanitizer will have little effect because of the neutralizing effect of organic matter on sanitizers. Use the wire brush and water to remove all of the visible mud and organic material, then mist them with sanitizer. The soft nail brush is useful for cleaning clothing and other delicate items.

When considering a sanitizer, choose one allowed for both farms and processing under the NOP rule to avoid potential questions or issues regarding prohibited substances. Common household bleach (sodium hypochlorite), hydrogen peroxide, and iodine are all effective, NOP compliant, and readily available off the shelf from any pharmacy and most grocery stores. All sanitizers need to be left on the treated surface for at least a minute to achieve a high kill rate. Iodine and hydrogen peroxide can be used straight out of the bottle; note, however, that household bleach is corrosive and should be diluted to a solution containing 200 ppm free chlorine for typical sanitizing purposes. Two teaspoons of 8% sodium hypochlorite (the concentration found in many grocery store products) added to one gallon of water, or 3 teaspoons/gallon of products containing 5.25% sodium hypochlorite, yields a concentration of ~200 ppm. In situations where a heavy pathogen load may be present, one cup of bleach can be diluted in a gallon of water to produce a heavy-duty disinfecting solution.

6. Vehicles are recognized as a high-risk source of horizontal disease transmission between livestock and poultry facilities. Service vehicles that transport feed, animals, or people in direct contact with animals (e.g., veterinarians; vaccination crews) pose the greatest threat, but personal vehicles also are a contamination risk.

In most cases, inspectors can minimize vehicle risk fairly easily. When visiting multiple livestock sites managed by the same operation, it is always best to travel between sites in the operator's vehicle whenever possible. This was the preferred mode of visitor transportation at several poultry operations I inspected; the use of personal vehicles was discouraged, and auditors and similar visitors were driven to the various sites by the flock manager. There may have been other reasons for this policy, but biosecurity guidelines consistently recommend limiting vehicle access as a key tool. I might add that, for me, riding with the flock manager had other benefits, not the least of which were building rapport during a long inspection and utilizing time otherwise wasted behind the wheel to review and complete paperwork.

There will be occasions, however—perhaps a majority of your livestock inspections if you inspect a lot of independent livestock producers and small diversified farms—when you must provide your own transportation between sites. An obvious step is to pay attention to where you park and studiously avoid parking in places where any amount of manure, mud, or water are present, as these are the places most likely to harbor pathogens. If you keep your treads and wheel wells clean, there is little risk. This may not always be possible, however, particularly if conditions are wet and/or there is incomplete separation at the farm between traffic lanes used by farm equipment or livestock, and those used by non-farm vehicles. Washing off the tires and undercarriage of your vehicle between sites is a good practice in those situations, but one that may not always be feasible. Aside from eating up valuable time, it requires access either to a garden hose at the farm or a car wash en route.

7. Think twice about trying to conduct an inspection if a highly contagious (HP) livestock disease is reported in the region, because it amplifies the risk of spreading disease to uninfected facilities. While the exact details may never be known, many observers of the 2004 BC event suspect that service vehicles and other traffic may have spread the AI virus between different and unrelated sites early in the event, before anyone realized how widespread or pathogenic the disease was. Serious incidents are typically monitored and reported on the websites of state departments of health, agriculture, etc., and the operator should be also able to alert you during your initial contact (see #1). You can always schedule the visit later.

8. Avoid or minimize touching crops, livestock, and equipment during inspections. A number of serious crop diseases are easily spread by touching, particularly those that release spores, such as such as gray molds on berries and most vegetable blights. Mosaic viruses are another group that readily

spreads by plant-to-plant contact from insects and people. And keep in mind that poultry litter stockpiled on a crop farm (a common fertility amendment) probably contains pathogens.

9. Wash your hands! This is a no brainer and should probably be at the top of everyone's list. Make this the very last thing you do before leaving. Washing with regular (i.e., not antibacterial) soap and water is ideal, but if that isn't an option, carrying cleansing and/or sanitizing wipes can be a lifesaver in this regard.

In summary, despite the real potential for encountering pathogens in inspection settings, you shouldn't feel like you have to don a moonsuit to perform every inspection. It is useful to remember that we are all exposed to various disease organisms on a daily basis. Adjust your biosecurity practices to fit the risk, while respecting the biosecurity protocols of the inspected party. Be informed about potential pathogen issues at the places you inspect, be alert to your surroundings, and take simple, common-sense steps to avoid becoming a vector.

Ib Hagsten suited up for a poultry inspection.

Further Reading

The following list is just a small sampling of the thousands of websites, scientific articles, agency guidelines, etc. available on the subject of biosecurity, and represents some of the more informative, interesting, and/or objective resources I found while compiling this article.

Blythman, J. So who's really to blame for bird flu? The Guardian, June 7, 2006.

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GRAIN. Fowl play: The poultry industry's central role in the bird flu crisis. GRAIN, February 2006. http://www.grain.org/go/birdflu

Ho, M-W. Fowl play in bird flu. Institute of Science in Society (ISIS) press release, May 5, 2006. http://www.i-sis.org.uk/Fowl-Play-in-Bird-Flu.php

Madsen, J.M., et al., Avian Influenza Seroprevalence and Biosecurity Risk Factors in Maryland Backyard Poultry – A Cross-Sectional Study, PlosOne, Feb. 20, 2013. http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0056851

Morrigan, J. Avian Influenza, Biosecurity and Organic Poultry Production: Organic Ag Centre of Canada, 2012: http://www.organicagcentre.ca/Extension/ext_bird_flu.asp

Newell, D.G., et al., Biosecurity Based Interventions and Strategies to Reduce Camphylobacter spp. on Poultry Farms, J. of Applied and Environmental Microbiology, v. 77(24), Dec. 2011. http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3233073/

Permin, A., Best Management Practices to Improve Biosecurity in Poultry Farming Systems: U.N. Food and Agriculture Organisation, 2009. http://www.fao.org/docs/eims/upload/238303/ah751e.pdf

Purdue Extension. Biosecurity for small poultry flocks, 2013: http://www.extension.org/pages/67296/biosecurity-for-small-poultry-flocks

Spencer, T., Avian Influenza in Free-Range and Organic Poultry Production: ATTRA, 2006, https://attra.ncat.org/avian.html

Board of Directors Minutes Highlights *(Full minutes available to inspector members on the IOIA website).*

June 19, 2014, Conference Call

Present: Ib Hagsten-Chair, Stuart McMillan-Vice Chair, Margaret Weigelt-Secretary, Garth Kahl-Director, Margaret Scoles-ED **Absent:** Pam Sullivan, Bill Stoneman, Isidor Yu.

Bylaws Amendments – Mail Ballot approval: Stuart moves "That the BOD supports the two existing bylaw changes." Garth suggests friendly amendment by adding "subject to further additional explanation/ rationale to be added by the Bylaws Committee." Unanimous consent.

USDA Sound and Sensible RFP: Garth moves that we approve the ED proposal response to the RFP about Sound and Sensible. Unanimous approval.

IOIA-Asia Committee & 2016 AGM: Isidor's detailed report about progress toward an AGM in Asia was hugely appreciated.

IOIA/COTA Collaboration on Processing Trainings: Stuart spoke in support of a collaboration with COTA to help promote the 100-level COR Processing webinar. Garth moves "to direct the ED to pursue a partnership with COTA about publicizing and participating in webinars." Unanimous approval.

Aug 7, 2014 Conference Call

Present: Ib Hagsten-Chair, Stuart McMillan-Vice Chair, Pam Sullivan-Treasurer, Margaret Weigelt-Secretary, Bill Stoneman, Member-at-Large, Margaret Scoles-ED. Absent: Isidor Yu, Garth Kahl

Treasurer's Report - 2nd Qtr Budget vs Actual, Balance Sheet & 2013 990 IRS Return. Pam summarized our financial position at the half-way mark. Bill moves to accept Treasurer and Financial Reports. Unanimous consent.

2013 990 IRS Return: Bill moves to approve 2013 990 IRS Return. Unanimous consent.

CLARIFY BOD DECISON: Contributions to travel to 2016 AGM. Pam suggested BOD members finance 1/3 of the airfare to the 2016 in Asia. She moves that the board is responsible for 1/3 of their airfare to the 2016 AGM. Unanimous consent.

8) FOOD SAFETY TRAINING PROPOSAL
IOIA member and organic/food safety inspector Stephen Bird introduced his written proposal for a joint venture with IOIA to train (with his wife Caroline A. Wadlin M. D.) inspectors to the meet the basic educational prerequisite qualifications most organic inspectors need to qualify for work application to a GlobalGAP Food Safety audit company. Questions were asked and answered by Stephen about logistics, risk/liability, staff time and costs/income to IOIA, the need for organic-food safety inspectors and the length of training (1-week). Ib suggested MS discuss the proposal with IOIA staff keeping the IOIA mission in mind so as not to detract from it and if needed bring their response to September BOD call. No BOD decision.

ACCREDITATION REVIEW COMMITTEE (ARP): Stuart moved to appoint Pam Sullivan to the inspector position on the ARP and Ellen Hagsten to the non-IOIA member position, and Dave DeCou to serve as the alternate non-IOIA member. DECISION: Approved by majority of executive committee. Pam and Ib recused themselves.

BYLAWS AMENDMENTS – MAIL BALLOT APPROVAL: We discussed the clarity of wording for the contingency plan for unfulfilled terms or midterm vacancies. Consensus was to move ahead and make the ballot a special hard copy mailing.

ED REPORT: MS requests approval for the following staff policy additions to section "308 Employee Benefit (Health)". MW moved to approve the two requested additions to the IOIA staff policy handbook. Motion approved.

Aug 12, 2014 Conference Call

Board Members Present: Ib Hagsten-Chair, Stuart McMillan-Vice Chair, Margaret Weigelt-Secretary, Pam Sullivan, Treasurer, Bill Stoneman-Member at large, Margaret Scoles-ED. Absent: Isidor Yu, Garth Kahl

BOD Retreat: Consensus was reached to retreat. Each member will pay their own air fare with the option for partial or full reimbursement if year-end finances allow. We will meet Oct 23 for our regular BOD meeting as usual at 6:00 pm Mountain Time. We agreed to meet from 8:00 am Friday – 11:00 am Saturday Oct. 25.

September 19, 2014 Conference Call

Present: Ib Hagsten-Chair, Stuart McMillan-Vice Chair, Pam Sullivan-Treasurer, Margaret Weigelt-Secretary, Isidor Yu, Director, Garth Kahl-Director, Margaret Scoles-ED.

Report from the Chair: Ib reported that he did a presentation for NRCS staff in Des Moines Iowa about organic. He then commented about his written draft responses to the NOSB's Compliance, Accreditation, and Certification Subcommittee (CACS) Discussion Document regarding "Assessing Soil Conservation". He intends to dialogue further at the NOSB meeting with ACA, OTA, OTCO and others.

NOSB: Stuart moves and Margaret Anne seconds in favor of sending Ib to the October 28 - 30, 2014 NOSB meeting in Louisville, KY. Motion passes unanimously.

ACCEPT BILL STONEMAN'S RESIGNATION Garth moves to accept Bill Stoneman's resignation from the BOD as of September 15. Motion passes unanimously.

Sound & Sensible Proposal: MS gives update on the status of our proposal and described the timetable and cash flow charts. Discussion followed about allocation and usage of human and capital resources, cash flow and reserves.

Proxy for IFOAM General Assembly: Consensus is reached to approach a non-IOIA member named Bob Quinn who will be given specific voting instructions to carry our proxy.

BOD Retreat: MS thinks we will be able to work out an accreditation scheme with 1.5 days of concentrated effort by a committed BOD. Consensus is to not hire a facilitator. MS suggests we get input from the current accreditation committee and from an Ad Hoc Committee. Ib will talk to the agronomy society in the US about accreditation schemes and report back. Stuart will talk to the agronomy society in Canada about accreditation schemes and report back.

Respectfully submitted by Margaret Weigelt, Secretary

New Sweet Corn Variety for Organic Farmers Hits Marketplace

Port Townsend, WA – Organic Seed Alliance and the University of Wisconsin–Madison are proud to announce the release of a new sweet corn variety called 'Who Gets Kissed?'. The open-pollinated variety is the first in a series of organic sweet corn releases developed through participatory plant breeding, where farmers and formal breeders collaborate on farm-based breeding projects to improve agricultural crops.

"Most of the sweet corn varieties in the marketplace that demonstrate similar traits are hybrids," says University of Wisconsin-Madison graduate student Adrienne Shelton, who has worked on the project.

"Hybrids are developed to be genetically uniform, where the ears are the same color and same size, and they mature at the same time. 'Who Gets Kissed?' has similar traits, but was developed for organic growers who appreciate a more diverse, open-pollinated sweet corn."

"And because it's open-pollinated," she adds, "growers are encouraged to save and select seed from their harvests to adapt the variety to their own local conditions and market needs."

From Ag Insider Dec 3

Organic News and Analysis

The NOP's Tierney Enforcement Case – Five Years Long and Counting

By Richard D. Siegel
Richard D. Siegel Law Offices

WASHINGTON, DC - When a Bucks County, Pennsylvania, organic farmer defended himself in a judicial hearing earlier this year before a USDA Administrative Law Judge, the farmer lost that round, but as the case reveals, he has so far delayed the revocation of his certification for nearly five years just by going through the AMS appeal process and continuing on to the judicial hearing stage. Moreover, his revocation is still on hold as he continues to fight his case inside USDA.

Michael Tierney, of Birchwood Farms in Newtown, Pennsylvania, is a third-generation farmer on the farm his grandfather started in 1943. He is on the Upper Makefield Township Board in Bucks County and a U.S. Marine who served in Iraq. His dairy operation promotes and sells raw milk, which Pennsylvania law allows. A Penn State graduate with a degree in animal sciences, he runs an Agriculture Awareness program for underprivileged city youth. Finally, since January 12, 2010, when his certifier, Pennsylvania Certified Organic, sent him a notice of proposed revocation based on several alleged violations, he has vigorously and persistently fought to prevent having his certification revoked. He has acted as his own lawyer, even at the USDA judicial hearing.

The violations PCO found against Tierney in 2010 included:

- selling pork as organic when the pigs, which were organically raised after coming to Tierney's farm, were not however from an animal that had been under continuous organic management for the last third of gestation.
- selling the pork as organic after using a processing operation for the organically raised pigs that was not certified.
- selling pork, other meat products and ice cream without adding these products to the farm's organic system plan
- not keeping adequate records of hay fed to cattle or forage consumed by organic cattle on pasture
- feeding organic cattle at a certain time with non-organic barley which, in addition, contained propionic acid, a synthetic not authorized for livestock feed.

The USDA judicial hearing was April 8 before Judge Janice K. Bullard. Tierney and his father, Michael P. Tierney, testified on Tierney's behalf. The witnesses for the NOP were Inspector Brian Magaro, an IOIA member, who inspected the farm in 2009; Inspector Amy Talarico, who inspected the farm in 2010; Kyla Smith, PCO's Certification Program Director, and Matthew Michael, Director of the NOP Compliance and Enforcement Division.

On October 9 Judge Bullard issued a 26-page Decision and Order finding that Tierney had committed all the violations and moreover had acted "willfully." The ruling ordered Tierney's farm to have its certification revoked for five years. The judge's ruling, *In Re: Michael Tierney, doing business as Birchwood Farms, Respondent,* Docket No. 13-0196, is at http://www.dm.usda.gov/oaljdecisions/initial-current.htm. The case is continuing with an appeal, filed by Tierney on November 18, to the highest legal authority in the USDA, Judicial Officer William Jenson.

Meanwhile, as Tierney continues to fight the revocation, he has not been allowed to sell his products as organic since May 2013, when PCO ordered his operation suspended. Tierney did not appeal that suspension, for reasons that are not clear, nor has he sought to be reinstated following that suspension. In recognition of the time that Tierney has already been suspended from the NOP, Judge Bullard's order specified that the five-year revocation would begin as of May 2013.

Both of the inspectors who testified in the case, Brian Magaro and Amy Talarico, were trained by IOIA. Judge Bullard noted this in her ruling when describing their qualifications. Inspector Magaro, Judge Bullard wrote, is an IOIA member, has been an independent organic inspector since 2009 and since 1993 has attended about 25 separate training sessions on organic certification. Inspector Talarico, Judge Bullard wrote, has been an independent inspector for 11 years and is certified by IOIA as an inspector for crops, livestock and processing.

Tierney's Defenses to the PCO Allegations

At the judicial hearing on April 8 Tierney maintained he could not comply with the "last third of gestation" rule because that meant he would have had to buy either a pregnant animal or an infant animal and raise it organically. In the most contentious part of the case, Tierney and his father said that when Inspector Magaro was at the farm in September 2009, he had advised Tierney that as there were no certified organic processors nearby, Tierney could have the pigs slaughtered and butchered at a non-certified operation if it was done at the start of the day when the facility was clean. Magaro denied this at the hearing, saying after 31 years of experience, he would never give such advice to an operator because it was simply not allowed. Tierney explained that when he took the animals to the non-organic processing plant, he was able to have the meat products labeled as organic with the cooperation of the USDA meat inspector, who accepted Tierney's organic labels for the meat. All this happened, Tierney said, because he did not understand the regulations. Tierney said that later in 2009, after he learned that an organic processing facility was one and a half hours away, he started using that facility instead. Tierney admitted that he had sold the earlier products as organic because he did not understand the regulations.

Tierney said that while his farm was first certified in 2004 by PCO, until 2009 he did not realize that he had to update his certification when he added new organic products. He said that at the time of the 2009 inspection he did not understand how to satisfy the NOP recordkeeping requirements for cattle on grass. He has since installed a recordkeeping system with lot numbers for each product, at a cost of $10,000, and a parlor system that measures milk flow and has a daily log. He defended his adding propionic acid to the cattle feed because propionic acid is found in the cattle's natural rumin. He thought it was compliant to use non-organic feed as long as it was non-GMO.

Tierney argued that the NOP case was barred by the "statute of limitations," because the USDA did not bring the complaint until five years after the alleged violations, which Inspector Magaro had observed in 2009. Judge Bullard said this was without merit because there was no "statute of limitations" that applied.

Judge Bullard's Conclusion that Tierney Acted "Willfully"

Despite the positions Tierney took, Judge Bullard found he had "willfully" committed all the violations PCO had alleged. She accorded "substantial weight" to Matthew Michael's testimony on "the significance of recordkeeping to demonstrate compliance with the NOP Regulations." Judge Bullard continued:

> *Compliance inspections are infrequent, the ratio of inspectors to facilities is small, and the program relies heavily on voluntary compliance of participating certified operators. Respondent's recordkeeping was considered inadequate to show how much food his pasture fed animals ate when turned out. Mr. Tierney seemed to believe that he did not need to keep records of cows that spent most of their lives out in pasture, eating at will, and seemed to believe that the apparent health of the cows proved that they were sufficiently fed. However, the record makes clear that Respondent was advised that records of the whereabouts of each cow at any time must be recorded, and an approximation of their intake could be made to satisfy the requirements of the NOP Regulations.*

Responding to Tierney's claim that he did not understand the recordkeeping requirements, Judge Bullard said:

> *Other recordkeeping deficiencies were noted by inspectors, and Respondent has apparently realized the importance of maintaining records, considering his purchase of an expensive recordkeeping system tailored to NOP participants. I find no support for Respondent's claim that the record fails to establish 'what acceptable record keeping is.' The NOP Regulations set forth specific requirements for records that must be maintained, and I accord weight to the testimony of two PCO inspectors who discussed recordkeeping deficiencies with Respondent after their inspections.*

See **Tierney,** page 28

Tierney, from page 27

Turning to whether Tierney's violations were "willful," Judge Bullard responded to Tierney's claims that "mistakes were made due to misunderstandings" and Tierney was "overwhelmed when he first sought certification in 2004." She also replied to Tierney's closing argument, in which Tierney had said "his shortcomings were due to NOP's failure to impose clear guidelines for certifying agents and operators to follow."

Judge Bullard totally rejected Tierney's explanations. Tierney's conduct, she said, "demonstrates a grasp of the program's requirements and novel methods to implement them. Many of his defenses are little more than excuses for his conduct."

In a stinging repudiation of Tierney's position, she added that when Tierney realized he was not able to understand the NOP requirements, Tierney might have turned to a consultant but instead he "purposely devised ways to avoid the rigors of compliance" by claiming he did not understand.

> *I find that Respondent's attribution of his non-compliance with the Act and NOP Regulations to various factors, such as the failure of PCO to give him guidance; the lack of training from government entities; his misunderstanding of requirements; and plain ignorance of the regulations, reinforces the conclusion that Respondent's violations were willful. Respondent did not seek the advice of a consultant or otherwise strive to learn the NOP standards first hand. Indeed, Respondent purposely devised ways to avoid the rigors of compliance while maintaining ignorance of the NOP Regulations.*

As an example, Judge Bullard pointed to Tierney's use of the non-organic processing plant, where a USDA meat inspector applied Tierney's organic labels to the meat products. She said this "suggests a disingenuous plan designed to circumvent the NOP regulations while maintaining the appearance of compliance."

> *The USDA inspector who had labeled Respondent's meat as organic with labels that Respondent provided was not associated with the NOP. Respondent used his certification to get the labels approved, and then delivered them to the non-organic slaughtering facility, fully aware that the plant was not organic. This overt circumvention of the regulations resulted in the labeling of meat produced at a non-organic facility as organic, and lulled consumers to believe that the meat bearing the USDA label was organic.*

Judge Bullard summed up the evidence as showing that "when faced with a difficult compliance issue and satisfying his convenience, Respondent chose the easiest path." For example, she noted that Tierney was still, at the time of the hearing, using the USDA Organic seal on his website, despite the fact that Tierney had been suspended from the NOP in May 2013. She said Tierney's reason, that it would cost "thousands of dollars" to remove the seal from the website, was "somewhat implausible."

But as noted earlier, Tierney is not giving up his fight, so Judge Bullard's ruling still does not make the revocation final. Even if the USDA Judicial Officer denies Tierney's latest appeal, Tierney will then have the right to sue the USDA in Federal Court.

Richard D. Siegel, an agricultural lawyer in Washington, DC, specializes in matters related to the NOP. He is a former Deputy Assistant Secretary of USDA for Natural Resources and Environment. rsiegel@rdslaw.net

Funding, from page 1

A third tool is training exercises and materials to assist inspectors and certifiers in Sound and Sensible approaches in verification of scale-appropriate recordkeeping and providing technical assistance to producers. Operators sometimes complain that their inspector isn't helpful enough or that recordkeeping demands are onerous. IOIA trains inspectors not to assist producers in overcoming barriers to certification, as per 205.501(a)(11)(iv). However, 205.501(a)(8) also requires that certifiers "provide sufficient information to persons seeking certification to enable them to comply". These training materials will add to the inspector's toolbox to better walk the line between those two regulations without discouraging producers.

Lack of certified organic slaughterhouses has been identified as a significant barrier for organic livestock producers. IOIA's fourth project outcome will directly address this issue with the de-

Funding, from previous page

velopment of a self-guided and on-line learning module for slaughterhouse inspections. The training module will provide a new learning resource useful to inspectors, reviewers, livestock producers, and custom slaughterhouses who are considering organic certification. The module will explain the process of inspecting and certifying slaughter houses with a sample organic system plan (completed), a pre-recorded webinar of the applicable livestock and handling standards, self-directed quizzes, and a video of a slaughter-house inspection. There are currently few on-line self-directed training tools of this type, so it also opens up a new way of training and learning. This funding will gives IOIA a prototype for developing similar training modules on other topics. The module will provide producers with an excellent resource when contacting a local custom slaughter plant. If the manager is concerned about bureaucracy and difficulty, the module would demystify and explain the inspection process. Slaughterhouse personnel can better prepare for inspection and modify their operations and practices prior to inspection with increased chance of success with certification.

The successful contract for $106,000+ was announced in late August. The project is highly collaborative with the NOP and will be completed by September 1, 2015. Project partners include the National Center for Appropriate Technology and the Accredited Certifiers Association, as well as livestock producers, farmers, film consultants, and organic inspectors.

IFOAM Report

from The Insider, October 2014

Organic World Congress, 13-15 October 2014

Approximately 900 people from 81 countries joined came together in Istanbul, Turkey. This turn out, combined with the many fact-filled speeches, presentations, and workshops paid tribute to the vision of the late Viktor Ananias, who was instrumental in bringing the organic movement to Istanbul. One of many insightful speakers, former Deputy American Minister of Agriculture, Kathleen Merrigan, pointed out the importance of building bridges saying, *'The big bridge we have to build is to the next generation.'* As 2014 is the International Year of Family Farmers, the needs of family farmers were also examined with the Director of the Forum for Agricultural Research in Africa (FARA), Yemi Akinbamijo, pointing out that food security needs to be addressed urgently because *'nobody can eat potential.'* The calls for putting theory into practice came from many and were supported by Lyonpo Yeshey Dorji, the Bhutanese Minister of Agriculture who reiterated the country's commitment to going 100% organic by 2020. The congress closed with Markus Arbenz, IFOAM Executive Director, expressing the urgent need to enable access for people the world over to *'healthy, nutritious, organic food.'*

IFOAM G.A. Votes in a New World Board

The IFOAM General Assembly (G.A) convened on October16-17. Among the many issues voted on, a new World Board was also chosen. A total of 17 candidates stood for election to the 10 places on the IFOAM World Board for the tenure 2014 -2017. The results are as follows: President: Andre Leu (Australia); Vice Presidents: Manjo Smith (Namibia), Frank Eyhorn (Switzerland); Eva Torremocha (Spain), Gabi Soto (Costa Rica), Mathew John (India), Peggy Miars (USA), Gerold Rahmann (Germany), Roberto Ugas (Peru), Zeijang Zhou (China). Congratulations, Peggy! IOIA will be sad to see Matthew Holmes of Canada off the Board. **Thank you for your service, Matt!**

And the Next Organic Congress Will be Held in …. India!

Brazil, China, Russia and India had all expressed an interest in hosting the next Organic World Congress. A paper ballot resulted in Brazil and India coming out as favorites. Through a show of hands the IFOAM G.A. then decided that the 19th Organic World Congress should go to India - home to hundreds of thousands of organic farmers!

OTCO Waives E&O Insurance Requirement

Liability insurance availability, perceptions regarding how much exposure really exists, and OTCO's requirement for inspectors to have insurance have been the subject of much discussion on the IOIA BOD this year. An informal survey of certifiers indicated that OTCO may have been the only North American certifier with an E&O requirement. Garth Kahl, IOIA BOD member, said. "They should be commended for having the courage to make the change."

NOSB, from page 8

Key votes from the meeting:

Crops Subcommittee

- Motion to remove sulfurous acid from 205.601 failed. Vote 3 yes, 11 no. Material renewed and remains as an option to reduce pH in irrigation water.
- Motion to remove Sodium Carbonate Peroxyhydrate from 205.601 failed. Vote 5 yes, 10 no. Material remains listed as a sanitizer.
- Motion to remove Aqueous Potassium Silicate from 205.601 failed. Vote 6 yes, 9 no. Material remains listed for disease and insect control. This material would have come off the list without the Sunset rule change. This is the first listing to be affected by the Sunset rule change.

Livestock Subcommittee

- Motion to request NOP review the document on Vaccines from Excluded Methods and provide guidance to certifiers, NOSB, and materials review organizations on the use of vaccines made with excluded methods in organic livestock production. Vote 15 yes, 0 no.

Handling Subcommittee

- No change to glycerin (petitioned for removal from 205.605 and addition to 205.606). Proposal withdrawn.
- No action taken on whole algal flour (petitioned for addition 205.606 (withdrawn for consideration in the future).
- Motion to remove Gellan Gum from 205.605(a) failed. Vote 3 yes, 12 no. Material remains listed.
- Motion to remove Tragacanth Gum from 205.606 failed. Vote 3 yes, 12 no. Material remains listed.
- Motions to remove Marsala and Sherry from 205.606 passed. Vote 15 yes, 0 no. Materials will go through rule-making to remove from list of allowed non-organic ingredients.

Compliance, Accreditation, & Certification Subcommittee

- Assessment of Soil Conservation Practices Discussion Document was discussed, but no definitive action taken. The CAC Subcommittee will bring a proposal to the Spring 2015 meeting.
- The NOP has indicated that the announcement for the NOSB Certifier position will be made early in
- 2015 with a new representative taking their seat in Jan 2016. Mac Stone of Kentucky has filled this position.

Teri's Back!

IOIA is pleased to have **Teri Lindberg,** left, returning in January as part-time administrative and training support. She worked at IOIA for about four years and left in 2011 for a different job. She and her husband raise cattle and hay on their ranch about 60 miles from Broadus. They have two grown children.

Also, we **welcome Linda Bird**, at far right in the group photo on page 31, who has served as the part-time IOIA bookkeeper for nearly a year. She brings a career as a Certified Public Accountant to her work at IOIA. She and her husband also farm and raise cattle, about 40 miles from Broadus. They have two daughters, the youngest of which is in her senior year of high school.

Recent NOP Updates and key compliance dates

For complete details see NOP website. www.ams.usda.gov/NOP

- Annatto was removed from 205.606. on Nov 3, 2013, so it must be organic to be used in organic products. Effective Nov 3, 2014.
- Rule change posted Sept. 30, 2014 added Biodegradable biobased mulch film to 205.601. Effective Oct 30, 2014.
  205.601(b)(2)(iii)
  - Biodegradable biobased mulch film as defined in 205.2. Must be produced without organisms or feedstock derived from excluded methods.

  Also added were a definition (205.2, subpart A) which addresses Compostability (references 3rd party standards), Biodegradability- must break down 90% in 2 years and Biobased content required. Also added an entirely new section (205.3) addressing 3rd party verifications.
- Streptoymcin for fire blight, off list 205.601. Effective Oct 21, 2014.
- Policy Memo- 14-3, June 9, 2014 . Clarifies that electrolyzed water may not be used as a sanitizer because it contains the active ingredient hypochlorous acid, which is not on the lists of allowed synthetics 205.601, 205.603, or 205.605.
- Policy Memo 14-1 – Aquatic Plant Extracts, March 12, 2014. Phosphoric acid is prohibited to adjust pH in aquatic plant extracts. Effective March 12, 2015
- Policy Memo – 14-2 Chlorine Use in Egg Breaking Facilities. Clarifies that Chlorine Guidance was counter to the Food Safety regulations, as eggs would have to be rinsed with potable water before breaking. Clarifies that post-chlorine rinsing is not required, applies to egg breaking facilities only, not applicable to organic eggs sold as whole eggs. Effective date: August 5, 2014
- NOP 4012, Certifier Instruction, posted Aug 14, Use of Brand or Company Names Containing the Word "Organic" Clarifies that manufacturers may not use "organic" on the PDF if not certified and may not use "organic" on the PDF for MWO products. MWO products may only use "organic" in the ingredient list. Recognizes that labels have been approved and allows for transition to change over labels – "sound and sensible" approach.
- Final Guidance, Handling Unpackaged Organic Products, NOP 5031-1. Effective Jan 22, 2014, with a transition period of another 18 months to allow everyone to come into full compliance.

Almost All Together

With many remote and part-time employees, getting IOIA staff together is a rare treat. On Sept 5, they did just that for an all-staff meeting in Broadus.
Diane Cooner, Newsletter Editor and Website Manager, participated by Skype.

L to R: Jonda, Sacha, Joe, Glenda, Kathy and Linda.

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Keep IOIA Strong – Lend Your Strength And Get Involved!

2015 Calendar

January 21 - 24, 2015 35th Annual EcoFarm Conference, Pacific Grove, CA . The full conference schedule and all registration details can also be found at www.ecofarm.org/conference

January 29 – February 1 Guelph Organic Conference & Expo. www.guelphorganicconf.ca

February 5-7 Portland, OR. Organicology www.organicology.org

Feb 5 – 7 MOA 2015 Conference and Small Farm Expo, University Plaza Hotel and Convention Center, Springfield, MO. 3 full days of 7 concurrent tracks of Organic & Sustainable Farming Workshops.

February 10 Little Rock, AR. National Organic Program Certifier Training. At The DoubleTree by Hilton.

February 11 - 12 Little Rock, AR. ACA Professional Development Training. At The DoubleTree by Hilton.

February 26-28 MOSES Organic Farming Conference, La Crosse, WI. 67 workshops over 6 sessions; 2-Floor Exhibit Hall; 3,000+ Participants. http://www.mosesorganic.org/conference/

March 28, 2015. IOIA Annual General Meeting, Chico Hot Springs, Montana. See page 6 of this issue.

San José, Costa Rica, Farm Inspection Course - Spring 2015, details to be announced.

Please see page 3 for the current list of IOIA on-site trainings and webinars