



International Organic Inspectors Association
P.O. Box 6 • Broadus, Montana 59317
Phone/Fax: (406) 436-2031 • www.ioia.net

IOIA COMMENT POLICY

This policy provides steps to determine whether IOIA will submit comments on local, state, national or international issues in the organic industry that would impact (direct, indirect or cumulative) inspectors and/or the inspection process; or issues outside of the organic industry which impact independent contractors.

Clarifying Definitions:

- Direct: without intervening persons, conditions, or agencies; immediate.
- Indirect: secondary or third level - complex pathway; also a system without direct impact on quality but will typically support direct impact.
- Cumulative: in combination with other past, present or foreseeable future impacts; multiplier effect.

Issues for comment may be brought up by IOIA staff and BOD, or members may request the BOD to consider commenting. The BOD will discuss – at regular BOD meeting or via email – the impact of the issue on inspectors, using a risk-based approach if it is an indirect impact, and whether commenting on the issue will serve the IOIA mission:

- Addresses issues and concerns relevant to organic inspectors
- Will promote consistency and integrity in the organic certification process

Commenting should also meet IOIA Goals and the Endorsement Policy, as applicable, as outlined in the IOIA Policy Manual.

If the BOD determines commenting will serve the IOIA mission, the Inspector Membership may be surveyed in the event of a potentially contentious issue to collect their opinion on whether or not the BOD should comment, and if so, what position they should take.

There must be a majority of the responding membership in favor of the BOD making a comment in order to move forward with the comment.

Survey Response Parameters:

- Must have at least 50 responses
- Majority must be at least 80% of respondents – this will apply to both points above.

If there is a short turn around time, the survey will still be sent, and if the member response meets the parameters within shorter timeline, the comment procedure will continue as dictated by the majority response. If the parameters are not met, a comment will not be made.

Survey responses will be analyzed by the *Policy Committee*:

- Whether response percentages meet the parameters
- Comments regarding how IOIA should respond

The BOD will determine who will write the comment – the Executive Director, BOD member or Policy Committee, and sets a deadline for the comment to be reviewed prior to submission.

The BOD and ED will review the comment. Once edits are made, the ED or the BOD Chair will sign the comment, unless extenuating circumstances lead the BOD to select a different signee.

