



# Independent Organic Inspectors Association

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February 8, 2007

Mark A. Bradley  
Associate Deputy Administrator  
USDA, AMS, TM, National Organic Program  
Room 4008-South Building  
1400 Independence Avenue, SW  
Washington, DC 20250-0020

Dear Mr. Bradley:

The Independent Organic Inspectors Association (IOIA) is a non-profit, professional association of organic farm, livestock, and process inspectors dedicated to verification of organic production practices. IOIA was founded in 1991 by organic inspectors who recognized the need for uniform inspector processes and protocols to build inspector skills and promote public confidence. The mission of IOIA is to promote integrity and consistency in the organic certification process, to provide quality inspector training, and to address issues and concerns relevant to organic inspectors.

IOIA provides organic inspector training and networking services world-wide. We have over 220 inspector or apprentice inspector members from 16 countries who conduct inspections for a wide variety of private and government organic certification bodies worldwide.

In IOIA's Code of Ethics and Conduct you can find, among others, the following statements:<sup>1</sup>

- Inspectors support and encourage the development, implementation and advancement of organic agriculture and processing.
- While performing in the professional capacity of an organic inspector or representing IOIA, inspectors shall be fair and impartial regarding various certification programs, provided that such programs meet minimum federal, state, provincial, or international organic standards.
- Inspectors should be sensitive to the social, political, and environmental variables of the region when inspecting.
- Inspectors are encouraged to foster goodwill and cooperation in the organic industry.

Organic production in developing countries in the hands of organized small growers (community grower groups) is a social and cultural reality that was not developed with the creation of standards but is deeply rooted in the history of traditional agricultural practices of these regions. Since more than 2 decades ago, the organic certification community recognized the need to guarantee organic integrity but also the need to adapt the certification procedures to such a socio-cultural reality. The outcome was the development of audit techniques based on risk assessment that can trustfully identify possible non compliances based on a two tier approach: an internal control system and an external third party audit. This is very similar to a quality system based audit or to an organic food processing audit where the organic inspector is not present auditing every organic run (as we understand it happens in USDA meat inspection or APHIS citrus handling). Instead, the organic inspector reviews the

management system, checks written internal procedures, and records and verifies it with sample audits.

Throughout more than a decade, IOIA inspectors have witnessed the development of community grower groups internal control systems. In the IOIA Inspection Manual 2<sup>nd</sup> edition (1998), there is a chapter on how to inspect community grower groups. Before NOP Final Rule and to date, five years after its implementation in 2002, many American and foreign USDA accredited certifiers have inspected and certified community grower groups based on internal control system evaluation. They have public written policies, procedures and/or guidelines on the process.

In a recent NOP certifiers training held on Jan 23<sup>rd</sup>, 2007, the NOP informed that (notes taken by Patricia Kane, ACA):

*Grower groups - certifiers are required to inspect each operation; scheme that has internal control group is not appropriate, as that person has a financial interest. Must review entirety of operation - management and individual operations. Still have to go to every site (cannot delegate to their internal control group). Don't necessarily have to do the opening and closing discussions with each location.*

IOIA 's Board of Directors is very much interested in this topic. Given the fact that this decision will have tremendous impact on small growers in developing countries, and given the fact that in the last five years the NOP has not only allowed but also accredited certifiers who use this CGG certification scheme, IOIA respectfully requests the National Organic Program not to publish an official policy on this subject without allowing sufficient time for dialogue and mutual understanding between all interested parties. This should not only include certifiers but also growers, internal control system staff members, inspectors, and possibly importers and consumers. Discussing what is an internal control system, reviewing the written guidelines and procedures that certifiers have, and actually visiting grower groups in different socio and agro-ecological scenarios, can shed useful light on this topic.

It is estimated that more than 300 grower groups and hundreds of thousands of growers produce organically in Latin America, the Caribbean, Africa, Asia and the Pacific. There is a huge diversity among them in size, structure, organization, agricultural practices, writing skills and access to technology. Discussion and conclusions cannot be driven from a small sample but should take into consideration this wide diversity.

We understand that all of these considerations must focus not on personal opinions but strictly on the current regulation and it must be discussed whether they fit it. IOIA is willing to contribute in all of its capacity to promote this dialogue and interaction. We urge the NOP to inform in the certifiers training in BioFach that such dialogue is open and to start it with the participation of as many parties as possible.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Luis Brenes', with a large, sweeping flourish underneath.

Luis Brenes, Chair  
on behalf of IOIA Board of Directors  
Jan 31st, 2007

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<sup>1</sup> the complete IOIA Code of Ethics and Conduct is available at <http://www.ioia.net/ethics.html>