

Inspectors' Report

VOLUME 30 - NUMBER 1 - WINTER/SPRING 2021

Court Rules USDA Authorized to Certify Soil-less Hydroponic Operations as Organic

SAN FRANCISCO—On Friday [March 19], the United States District Court for the Northern District issued a ruling in Center for Food Safety's (CFS) lawsuit challenging U.S. Department of Agriculture's (USDA) decision to allow soil-less hydroponic operations to be certified organic by exempting such operations from the requirement that certified organic crop producers build soil

fertility. Siding with the government, the Court ruled that USDA's decision to exempt hydroponic operations from the soil fertility requirement mandatory for all soil-based crop producers was permissible because the Organic Foods Production Act did not specifically prohibit hydroponic operations.

Background: The Court's ruling

last Friday stems from USDA's response to a petition filed by CFS in 2019, which requested USDA to prohibit organic certification of hydroponic operations that do not work with or build soil in 2019. After USDA denied the petition, CFS, along with a coalition of organic farms and stakeholders, filed a lawsuit challenging USDA's decision to allow hydroponic operations to continue to be certified organic in March 2020. The lawsuit claimed that hydroponic operations violate organic standards for failing to build healthy soils, and asked the Court to stop USDA from allowing hydroponically-produced crops to be sold under the USDA Organic label. <u>Oral arguments</u> in the case were presented in January 2021.

The plaintiff coalition in the lawsuit included some of the longest-standing organic farms in the United States, including Swanton Berry Farm, Full Belly Farm, Durst Organic Growers, Terra Firma Farm, Jacobs Farm del Cabo, and Long Wind Farm, in addition to organic stakeholder organizations, such as organic certifier OneCert and the Maine Organic Farmers and Gardeners Association.

In response to the Court's decision, CFS and the plain-



tiffs issued the following statements:

"Under the Court's ruling, hydroponic producers can sell their crops as organic without building soil fertility, yet organic farmers growing food in soil have to meet various soil-building requirements to be certified organic, " said Sylvia Wu, senior attorney with Center for Food

Safety and counsel for plaintiffs. "This double standard violates the very purpose of the Organic label and is contrary to the federal organic act. We are analyzing all our legal options and will continue to work hard to defend the meaning of the Organic label."

"Soil fertility has always been the fundamental building block of any organic farming system," said Paul Muller, co-owner of plaintiff Full Belly Farm in Guinda, CA, a producer of Certified Organic crops in California since 1984. "That's why at Full Belly, we work hard to build soil fertility through active soil management and amendment, diversified crop planting, cover cropping, and other farming practices that promote soil health and biodiversity."

> Credit to Center for Food Safety https://www.centerforfoodsafety.org/press-releases

Notes from the Chair by Rachel Cherry Myers

For those who don't know me, my name is Rachel Cherry Myers and I have recently taken on the role of IOIA chair. I'm following in some pretty big footsteps and am going to miss the kind leadership of Lois Christie. I'm incredibly excited to be working with 6 other incredible board members, all of whom bring unique and important attributes, experiences, and skills to the group. I'm a full time independent inspector based in Buffalo, NY. I do inspections in all three scopes, but have a special place in my heart for sitting at the kitchen table on an Amish **See Notes**, **p 4**

WINTER/SPRING 2021			
Welcome New Members	WEBINAR Training Schedule for details & to register go to: www.ioia.net/schedule_list.htv		
New inspectors	100 Level Webinar - May 4 and 7, 2021		
Alyssa Kellogg, Bayfield, CO	NOP Processing Standard		
Mario Velazquez Rivera, San Diego, CA	9:00 a.m 11:00 a.m. (Pacific) Two 2 hour sessions. Trainer: Garry Lean and/or Garth Kahl. Member cost \$325		
Upgrading to inspector	100 Land Web'r ar Mar 10 ar 101 2021		
Justine Dobson, Stewartville, MN	100 Level Webinar - May 18 and 21, 2021		
Jill Thudium, San Diego, CA	NOP Crop Standard		
Carly Wilson, Santa Cruz, CA	9:00 a.m 11:00 a.m. (Pacific) Two 2 hour sessions. Trainer: Margaret Scoles and/or Nate Powell-Palm. Member cost \$325		
Returning Inspector			
Daron Tansley, Putney, VT	200 Level IOIA/OMRI Webinar - May 19, 2021		
Raymond Yang, Dover, TN	COR Processing and Handling Input Materials 9:00 a.m 12:00 p.m. (Pacific) One 3 hour session.		
New Supporting Individuals	Presenter: Doug Currier. Member cost \$275		
Amy Bacigalupo, Montevideo, MN			
Johan Bolle, Fresno, CA	200 Level IOIA/OMRI Webinar - June 8, 2021		
Leana Bradfield, Medford, OR	COR Crop Input Materials		
Jennifer Chesworth, Port Matilda, PA	9:00 a.m 12:00 p.m. (Pacific) One 3 hour session.		
Nicholas Cuchetti, Columbia, MO	Presenter: Peter Bungum. Member cost \$275		
Kathryn Dickson, Browntown, WI	200 Level Webinar - June 30 and July 2, 2021		
Melody Elliott, Chillicothe, OH	Grower Group Inspection and Certification		
Robert Gardner, Greenville, FL	9:00 a.m 11:30 a.m. (Pacific)		
Duane Gibson, Greeneville, TN	Two 2 1/2 hour sessions.		
Patrick Gilliland, Cortland, NY	Trainer: Luis Brenes. Member cost \$275		
Chris Kidwell, Hayfork, CA	Trailer. Buis Drenes. Member cost \$275		
Wilfred Lus, Port Moresby, PAPUA	200 Level IOIA/OMRI Webinar - July 28, 2021		
NEW GUINEA	COR Livestock Input Materials		
Dominique M. Mailloux, Petaluma, CA	9:00 a.m 12:00 p.m. (Pacific) One 3 hour session.		
Victoria (Tibby) Plasse, Victor, ID	Presenter: Peter Bungum. Member cost \$275		
Gail Ross, Elko, NV	200 Loval Wahinan Santambar 10, 2021		
Brenden St John, Sharpsburg, GA	300 Level Webinar - September 10, 2021 Organic Cosmotics		
Matthew H Stong, Las Cruces, NM	Organic Cosmetics 9:00 a.m 2:00 p.m. (Pacific) Two 2 hour sessions		
Adam Nelson Utley, Cincinnati, OH	with a one hour break.		
Jeremy Warner, Lincoln, NB	Presenter: Gay Timmons. Member cost \$325		
Craig M Young, Shellbrook, Saskatche-	riesenter, day rimmons, member Cost \$525		
wan CANADA	Webinar Discount Note:		
Returning SI Members	All IOIA Inspector Members are eligible for 1 half-price webinar in 20		
Jessica Black, Eugene, OR			
Daniel Hermstad, Felton, CA	200 Level IOIA/OMRI Webinar - September 15, 2021		
Samuel Malriat, Kutztown, PA	NOP Livestock Input Materials		

New Supporting Business

Natural Food Certifiers, Inc., Menachem Flamer, Nanuet, New York

Regenerative Organic Alliance, Elizabeth Whitlow, CA

The Inspectors' Report is the newsletter of 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. Editor: Diane Cooner webgal[at]ioia.net 9:00 a.m. - 12:00 p.m. (Pacific) One 3 hour session.

100 Level Webinar - September 21 and 28, 2021

9:00 a.m. - 12:00 p.m. (Pacific) Two 3 hours sessions.

200 Level IOIA/OMRI Webinar - November 4, 2021

9:00 a.m. - 12:00 p.m. (Pacific) Two 3 hours sessions.

Presenter: Tina Jensen Augustine. Member cost \$275

9:00 a.m. - 12:00 p.m. (Pacific) Two 3 hours sessions.

Processing In/Out Balances, Traceability & Recipe Verification

200 Level Webinar - December 1 and 8, 2021

Trainer: Kelly A. Monaghan. Member cost \$275

Trainer: Kelly A. Monaghan. Member cost \$325

Presenter: Phoebe Judge. Member cost \$275

IOIA/COTA COR Processing Standards

NOP Processing Input Materials

under NOP & COR webinar

in 2021

.html

LIVE Online and Onsite Basic Training Schedules

IOIA's Live Online Basic Training courses require that participants first complete a 100-level Webinar on NOP Standards (2 sessions of 3 hours each) in the respective scope - Crop, Processing, or Livestock. Separate registration is required for this webinar unless previously completed. **Additional Requirements** for the course include participant reliable internet, a computer, and computer literacy. These basic organic inspection courses may also be presented using other standards (please contact the IOIA office).

Not finding a training you are looking for or all trainings full? <u>Please register here</u> to be contacted by IOIA when that training is available.

Detailed Info, Application, Registration for all courses available on our website.

Live Online Basic Crop Inspection Training

Course Description: The course provides basic level training to develop skills required for inspecting and reporting on the management of an organic crop production operations according to a specified set of standards. For courses conducted in the United States, the standard is the USDA, National Organic Program (NOP).

In addition, participants will be introduced to topics such as global organic certification, biodiversity, soil fertility management, and inspecting as a career. These and other topics are meant to provide historical background, more in-depth knowledge and awareness of current trends in the industry.

Live Online Basic Processing Inspection Training

Course Description: The course provides basic level training to develop skills required for inspecting and reporting on the management of an organic processing production unit according to a specified set of standards. For courses conducted in the United States, the standard is usually the USDA, National Organic Program (NOP). In addition, participants will be introduced to topics such as global organic certification, report writing, and inspecting as a career. These and other topics are meant to provide historical background, more in-depth knowledge and awareness of current trends in the industry.

Live Online Basic Livestock Inspection Training

Course Description: The course provides basic level training to develop skills required for inspecting and reporting on the management of an organic livestock production unit according to a specified set of standards. For courses conducted in the United States, the standard is usually the USDA, National Organic Program (NOP).

In addition, Organic Livestock Inspection Training follows IOIA's livestock curriculum requirements and includes instruction on applying and using NOP organic livestock standards; understanding the use of input materials; risk assessment; audit trail requirements; report writing; inspector conduct, confidentiality, and ethics; the difference between inspecting and consulting; effective communication; and organic inspection procedures for meat, dairy; fiber-bearing animals; and poultry (meat and eggs). Completion of Basic Crop Inspection Training is a prerequisite.

Onsite Trainings

October 18 - 29, 2021 - Farmington, Minnesota - Basic Crop and Livestock Training Basic Crop - October 18-22 | Basic Livestock - October 25-29 | Mt. Olivet Conference and Retreat Center

May 16 - 22, 2022, Saco, Maine - Basic Crop and Processing Inspection Training

IOIA and MOFGA Organic Certification Services will cosponsor basic Crop and Processing trainings at Ferry Beach Retreat & Conference Center in Saco, Maine. Details will be posted as they become available. These courses are concurrent.

Self-Directed Learning Courses

NEW! COR Series - Canadian Organic Regime - Our Organic Certification System - Now Available! Coming in May - COR Series - COR Crop Production Standards!

Remote Inspection Training; IOIA/American Grassfed Association Grassfed Dairy; and Dairy Feed Audit also available to take on your own schedule. More details on page **6.** See our website to sign up.

Notes from the Chair, from page 1

dairy. After years of being on the road traveling, I've made an effort to be home more to help with our small family farm run primarily by brother and sisters.

As a full-time inspector, I'm also excited to get back on site this year after many, many remote inspections. I was so very thankful to have the ability to work from home, but really just miss getting dirty in barns and little brown calves. I'll be happy to trade back screen time for actually walking fields and holding seed tags.

I'm honored to be able to represent IOIA as the Chair and look forward to the many opportunities at our doorstep. It will be another busy year!! As IOIA continues to build bridges within the industry, important work is being done. We continue to meet bi-weekly with the ACA board and are fortunate to have such an incredible Executive Director! Jenny Tucker has made an effort to appear at all of our invites and 2021 was the second year that inspectors were



invited to the NOP training. I am thankful and look forward to seeing more partnerships develop and deepen!

It is an exciting time to be an inspector!! What many consider to be the biggest regulation change since the NOP Final Rule was published, Strengthening Organic Integrity is largely centered on inspectors and inspections! In a follow-up to the proposed rule, Jenny Tucker addressed the importance of inspections with a memo addressing the critical Human Capital of inspectors. Her memo jumpstarted some critical industry wide conversation, and what a discussion it has been!! Our organization maintains an active voice in contributing input that shapes these changes. I want to personally thank all of you who participated in the survey for our NOSB comment or submitted your own comment on the Human Capital issue last month and want to assure everyone that there will be more opportunities to make your voice heard!

I'm looking forward to working with the board to create a strategic plan that will strengthen both IOIA and the industry at large. The board is working hard to navigate how critical programs and topics such as mentorship, credentialling, membership benefits, and human capital can be effectively integrated and/or expanded within IOIA and improve the industry as a whole. We are so very fortunate to be represented by inspectors across the world and so very much appreciate that insight. I absolutely look forward to hearing from our membership and invite and encourage emails and participation at our monthly Town Halls!

Rachel



Notes from the ED by Margaret Scoles

There are folks who are challenged by a blank page. My challenge is the opposite. How can I sift down through the many happenings of the past few months into 500 words or so? I can only share a few highlights.

IOIA AGM (Virtually): one of the best annual meetings I can remember, with the best attendance on record, and everyone safe. Thank you to the Planning Committee (Margaret Anne Weigelt, T Layhew, Wendi Jennings) who helped come up with ways to have mental breaks and engage more members with tools such as Slido polls. Three of IOIA's key staff members (Sacha, Diane, Teri) were there, Bonus! as well as Jonda Crosby. Jonda no longer fills the role of Training Services Director, as of Dec 31, but is still with us as a contract trainer and voting member.

and certifier staff. More than 40 of us took the free NOP training. The cost was just \$275 for 5 days of ACA/IOIA training - a bargain. Most of us don't have 7 days available for training in the middle of the day. However, registrants all received access to the Whova platform to download materials for watching on their own schedules. Most sessions were pre-recorded with the speakers live for Q&A. Chat lines were chattering constantly with questions and commentary. About a dozen IOIA members presented during the training and received free registration in return. Garth Kahl gave an outstanding presentation "Inspection and Supervision of Port Facilities and Bulk Vessels" with Pedro Landa- Organización Internacional Agropecuaria. One of the highest ranked sessions? "No Missing Links Here: Traceability,

ACA/IOIA/NOP

Training: A huge project, highly successful. Covid moved it from Texas to online and greatly enhanced attendance – 800+ on Day 1 and 2 for the NOP training (once again open to IOIA independent inspectors) and more than 300 for the ACA/ **IOIA** training. I served on the



Planning Committee, took a seat on the "Moderated Dialogue: Recruiting, Training, and Retaining qualified personnel" panel, and prepared a 20-minute recorded training on *"Organic Control Points for Livestock Slaughter"*. It was rewarding to see and hear one of the Montana producers I'd inspected as a hybrid inspection last summer talk about the good points of the hybrid model. At least 24 IOIA members attended, plus some who were identified as certifiers Mass Balance, & Supply Chain Audits" with Ken Commins of the Alliance for Organic Integrity and others.

OFA AGM and Senator Jon Tester: When I saw that Senator Tester was the keynote for the Organic Farmers Association annual meeting, I couldn't miss it. I was in the midst of reading his book, <u>Grounded</u>, published last year. Years ago, I was one of the many organic inspectors who inspected the Tester farm. Senator Tester is the only active farmer in the US Senate and has



been certified organic for decades. He is a strong ally in the US Congress and he hails from my own state, Montana. I make a trip almost daily to the nursing home, where my friend Anne, 92, is convalescing from a hospital stay. We finished the book last Friday and the next day, we started Bob Quinn's book, <u>Grain by Grain</u>. Bob Quinn was the first certified organic farmer in Montana and is a staunch advocate of renewal energy and sustainable agriculture.

IFOAM North America: IOIA hosted their annual meeting on March 17. New board members elected were Jeff Schahczenski, Montana; Alan Lewis, Natural Grocers, Colorado; Mary-Howell Martens, New York; and Nicolas Walser, British Columbia. In a bold and innovative move, we elected co-presidents Jennifer Taylor of Georgia and Marla Carlson of Saskatchewan. I remain in the position of Treasurer.

SAVE THE DATE THURSDAY JUNE 3

The first of 2 quarterly sharing sessions open to inspectors and certification staff to discuss timely tips and tricks with remote and hybrid audits.

Self-Directed Learning Courses

NEW! COR Series 100 level Courses

Canada Organic Regime - Our Organic Certification System - Now Available! Coming in May! COR Crop Production Standards

These two new courses, developed by IOIA Trainer Lisa Pierce, are the first of an eventual 4 courses that IOIA will be offering about the Canada Organic Regime. The first course, Our Organic Certification System, is about directing participants to resources and providing context. The premise is that, by providing insight into why the system is the way it is, explaining the 'how' and 'why' of documents, not just the 'what' of particular documents, participants will fully understand, appreciate, and be better equipped to navigate and interpret the organic rules and regulations.

Each course takes approximately 3 hours to complete.

All 200 level courses and higher require:

- completion of IOIA's 100-level in-person basic inspection course in the same scope of the course you wish to take (crop, livestock, handling), and
- completion of a minimum of 20 organic inspections over a 2 year period.

Remote Inspection Training

This is a 200 level course geared toward working inspectors and reviewers. This training will help inspectors gain confidence to perform remote inspections based on the ACA Best Practices; save time and money for inspectors, certifiers, and certified operators by increasing technological proficiencies; and keep inspectors working. It was born out of the need for inspectors to adapt their inspection techniques and protocols in the time of Covid-19. **Cost for the webinar:** Free for all IOIA Inspector Members. \$200 for all non IOIA Inspector Members.

Tambien disponible en español.

200 level Dairy Feed Audit

This course is geared for livestock inspectors, reviewers and organic program managers, and focuses on organic certification requirements to the NOP Standards.

Participants who have completed course work from IOIA including the 100 Level Livestock Standards Webinar, Basic Livestock Inspection Course, and Livestock Inspection Field Training are eligible. Others that would qualify for the course include current inspectors and those with knowledge of the NOP regulations, auditing, a background in livestock husbandry and crop production.

The course includes five hours of recorded presentations, a pre-course and mid-course assignment, practice exercises and a final exam. Once started the course must be completed within 60 days.

IOIA's Dairy Feed Audits online course is taught by experienced organic inspectors Nate Powell-Palm and Jonda Crosby. Nate and Jonda are dairy inspectors and have experience as certified organic operators - Nate with a multi-species livestock operation and Jonda as a crop farmer and livestock feed handler.

200 level IOIA/AGA Grassfed Dairy Inspection

This online course was developed by IOIA with the American Grassfed Association (AGA) to prepare experienced organic dairy inspectors to perform an "add-on" AGA inspection at the same time as an organic inspection, or as a stand-alone AGA inspection. The course focuses primarily on dairy cattle. Participants will learn AGA meat standards, since some organic dairies may also want to sell cull females and male animals as AGA meat. Dairy farm transition, production and animal handling standards are discussed as well.

It is expected that performing these add-on inspections at the same time as the NOP inspection will take approximately an extra hour. This course is presented by experienced IOIA Trainer Harriet Behar.

Organic News from Canada

IOIA First Live Online Crop Course to the Canadian Standard

Six participants from British Columbia to Quebec took the IOIA COR Basic Crop course April 12-16 under the leadership of veteran IOIA trainer Garry Lean. A course prerequisite was the completion of 2 modules of IOIA's new Self-Directed 100-level COR Standards. The first part on the COR Regulation and the second part on the Crop Standards). This new self-directed training format makes the standards training more accessible and convenient, and it avoids repetition of the COR Regulation, which was previously included in each of the three COR scopes. The new self-directed courses were developed by IOIA Trainer Lisa Pierce working with Jonda Crosby and Diane Cooner.

The Canadian basic course was a direct result of an increase in the number of registrants from Canada applying to the NOP based courses. IOIA responded with a course more relevant and useful in Canada. It has become more

challenging to offer IOIA basic training in Canada over the past several years. First, the geography of Canada is huge relative to the smaller number of potential participants in each province. Live online format allows everyone to participant from their home offices with no travel expense. Second, the US-Canada currency difference makes the training more expensive for Canadians. Live online format is less costly than in-person training to deliver, and that savings is passed on to participants.

Participants were Annie Houde, Amber Rumpel, and Travis Braitenbach (TCO Cert); Dianne Blais (CSI); Carmen Heer (PACS); and Amanda Bouchard (independent inspector)



Canada's new organic standard – what changed?

On December 11, the Canadian General Standards Board published the 2020 Canadian Organic Standards - Organic Production Systems: General Principles and management standards <u>(CAN/CGSB-32.310-2020)</u> and Permitted Substances Lists <u>(CAN/CGSB-32.311-2020)</u> after extensive review and public comment.

From the date of publication, all operators have one year to comply with the revised clauses of the 2020 Canadian Organic Standards. **Deadline to fully comply Dec. 11, 2021.**

The Org Federation of Canada (OFC) has prepared documents presenting the 2015 and 2020 standards side-byside with the 2020 modifications highlighted, and an excellent series of articles informing the industry of the main changes to the standards. <u>www.organicfederation.ca</u>

On March 11, the OTA presented a webinar highlighting key updates. Speakers included Bob Anderson, Sustainable Strategies; Tia Loftsgard, COTA; Alexis Carey, OTA; and Roxanne Beavers, QAI. The US and Canada are significant organic trading partners. About half of US organic exports go to Canada. Since 2009, when the US and Canada signed the historic USCOEA, there have been changes on both sides of the border in the standards with no change in the equivalency arrangement. The equivalency arrangement remains unchanged, although the governments have made one clarification regarding the certification of aquatic plants. Canada's aquaculture standards, including aquaponics, are now in force while the US has none. "Aquatic plants are eligible for USDA organic certification under the crop standards (NOP Policy Memo 12-1) and may be sold or marketed as organic in Canada." That didn't change. So, kelp is now certified under the Aquaculture standards in Canada and while still being certified under the Crop standards in the US. Both certifications (NOP and COR) are valid on both sides of the border. For more info about the agreement, see https://www.ams.usda.gov/services/organic-certification/international-trade

Organic Aquaculture CAN/CGSB 32.312-2018 became fully implemented on Jan 15, 2021 after a 2-year notice to industry of standard being published Jan 15, 2019. See **Canada**, page 11

2021 IOIA Virtual AGM – March 4

After a pandemic year of online meetings, developing an engaging annual meeting agenda was a challenge, but we rose to the occasion and we succeeded! Vice Chair Janine Gibson ran the meeting. The Annual Report was delivered by Lois Christie (remotely as she was waiting in line to get vaccinated!). Sixty IOIA inspector members attended, plus 9 guests (speakers, certifiers, and IOIA staff). This is a new record for IOIA inspectors at one AGM. Committee reports included Scholarship (Arthur Bassett, Mexico); Asia Pacific Committee (Mutsumi Sakuyoshi, Japan); Canadian and Fundraising Committees (Janine Gibson, Manitoba, Canada); Policy (Rachel Cherry Myers, New York); Mentorship (Amanda Birk, Pennsylvania);



Keynote Speaker **Jochen Kleboth**, Austria, Head of Data Analytics at Intact, delivered a riveting presentation, "Improving Audit Performance and Planning with Artificial Intelligence Tools". He explained how AI tools can help us "see more, find more, do more" as we deal with "the elephant in the room" – Fraud. He reassured inspectors that they will not be replaced by AI. "One thing for sure, auditors will always have work."

Riding the (Technology) Waves

Where some companies are

Al supported audits

Digitally supported audits

Paper supported audits

Back by popular demand a second year, **Michael Sligh** presented on the Alliance for Organic Integrity.

Full recordings of the AGM, including the Keynote Presentation, are available on our 2021 AGM Recap webpage: https://www.ioia.net/AGMReports/2021/2021AGM.html

The Board of Directors election was streamlined using Election Runner, an online voting tool. Each member

received an email with a unique link to vote. The program allowed us to send reminders, and over 50% of eligible members voted. A tool to keep for the future! Newly elected board members were **Beth Dominick** (California); **Terrance "T" Layhew** (Iowa); and **Allan Benjamin** (Missouri). Philippe Descamps was initially on the ballot but



Adios a tres amigos Lois Christie, Philippe Descamps and Ryan Sitler, were all elected at the 2018 AGM in Charleston when we voted (amid many sombreros, margaritas, and maracas) to go to Mexico in 2019. This trio put in incredible extra hours during the pandemic. IOIA salutes you for your contributions. Gracias! withdrew from the election before the AGM.

EVOLUTION / TIME

A **new scholarship** was established in memory of **Reynaldo De la Rosa**, inspector from Mexico. The new annual award was established by sponsorship from Garth Kahl, Angela Wartes-Kahl, and Lois Christie. It will cover tuition, travel, meals, and lodging for an aspiring inspector in Mexico. <u>Click here to donate</u> and help us reach our goal of \$5000.



Inspectors – incorrigibly optimistic and adventurous – the straw poll from our AGM of where we should be in 2022

IOIA en español

El pasado 24 de marzo se concluyó con éxito el primer curso virtual de Principios Básicos para la Inspección de Fincas Orgánicas, en español, avalado por IOIA y organizado por Eco-LOGICA.

por Ing. Nandayure Studt, Coordinadora de Innovación y Capacitación, Eco-LOGICA S.A.

Participaron 10 personas de Costa Rica y México de diversas empresas, grupos de productores, comercializadores y profesionales independientes. Los participantes calificaron el curso como provechoso, intensivo, dinámico, con instructores altamente calificados y con gran experiencia acerca de la aplicabilidad de la normativa orgánica al día a día en nuestro contexto latinoamericano.

Eco-LOGICA agradece la creatividad e ingenio de Luis



Brenes y Philippe Descamps en sus métodos y herramientas de enseñanza, y la participación y experiencias que todos los estudiantes trajeron a este espacio tan rico y diverso de aprendizaje! Un especial agradecimiento a Jonathan Castro, quien dedicó tiempo y esfuerzo a montar junto con Luis la visita virtual de inspección de práctica, en su propia finca orgánica familiar. Quedamos motivados, con nuevas herramientas y a la expectativa de lo que depare la edición 2022! Síganos en Facebook para estar al tanto de otras charlas y capacitaciones: <u>https://www.facebook.</u> <u>com/ecologicacr</u>

IOIA lanzó nuestro primer Boletín en español en marzo

¡IOIA se complace en informar que hemos enviado nuestro primer boletín en español! Como parte de nuestro nuevo acercamiento al sector orgánico poco servido en México y América Central, presentamos IOIA y nuestra misión, incluyendo los beneficios de la membresía de IOIA y una infografía general de nuestra asociación única.

También anunciamos el lanzamiento del sitio web del curso de Inspección Remota en español. Este gran recurso, desarrollado con la asistencia de la Comisión Interamericana de Agricultura Orgánica (CIAO), está lleno de información sobre cómo realizar inspecciones remotas (también conocidas como virtuales), con un seminario web pregrabado que discute procedimientos, ejemplos de cómo otros inspectores están manejando las inspecciones remotas y presenta una selección completa de videos integrados diseñados para ayudar a los inspectores a sacar el máximo de la tecnología disponible en el menor tiempo posible, para que nuestro trabajo pueda continuar de manera más segura en este período de pandemia. Este curso remoto es GRATUITO para los miembros inspectores de IOIA (tarifa especial de inspector de USD \$60) y está disponible por una tarifa reducida de USD \$200 para otros en el sector orgánico español. <u>REGISTRARSE AQUI.</u>

Por último, hemos promovido nuestro primer Curso Básico de Fincas en modalidad virtual y en español, un desarrollo muy emocionante que esperamos nos permita entregar nuestra experiencia en capacitación a más personas de una manera más fácil.

¡IOIA está entusiasmado con el desarrollo de estos materiales y ponerlos a disposición de una audiencia más amplia fuera de los angloparlantes! Planeamos enviar 4 boletines por año con noticias y ofertas de cursos.

Una nueva beca en memoria, specificamente para ellos de México

Se estableció una nueva beca en memoria de **Reynaldo De la Rosa**, inspector de México. El nuevo premio anual se estableció con el patrocinio de Garth Kahl y Angela Wartes-Kahl y Lois Christie. Cubrirá matrícula, viajes, comidas y alojamiento para un aspirante inspector en México.

Para donar, tenemos un enlace disponible en nuestro sitio web.



IOIA Speaks — Advocating for Inspectors to the NOSB by Margaret Scoles, Executive Director

National Organic Standards Board Proposal: Human Capital: Strategy for Recruitment and Talent Management – Inspectors and Reviewers.

IOIA surveyed the membership on key issues highlighted in the proposal. Non-inspector members were also invited (about 10% of 53 total respondents). Based on that survey, IOIA's Policy Committee prepared comments on key issues for inspectors. (click on Public Comment image below for our final 27 pages of comments).

First we answered the questions of the NOSB:

- 1. What have you experienced or witnessed that contributes to the shortage of organic inspectors/reviewers?
- 2. What are some additional strategies that can be employed to increase the numbers of organic inspectors and reviewers?
- 3. Are there appropriate ways for the National Organic Program to assist with the financial burdens of?

a. Initial cost of becoming a trained organic inspector.

b. Costs of continuing education for existing experienced inspectors, and

c. Compensation for organizations and/or experienced inspectors to provide qualified one-on-one mentorships to beginning inspector/reviewers.

IOIA urged NOP funding for:

- Feasibility studies for Apprenticeship and Credentialing Programs.
- Support for pilot programs with universities or colleges that create access to a broader funding support to lower the barriers to entry-level training.
- A State of the Industry Study that captures and publishes the data for a large percentage of inspectors and reviewers.
- Reduce duplicate annual training and increase consistency.

In addition, we addressed the following challenges and offered solutions and suggestions, supported by graphs and statistics from the survey.

- Travel
- Compensation
- Training and Education
- Insurance Cost
- Inconsistencies Deviations from Industry/IOIA established Best Management Practices

Angela Wartes-Kahl, IOIA Inspector member, prepared a guide to commenting – useful not just for this round, but for any public comment. <u>Download and read it here.</u>

On March 29 she led a webinar to assist members in making their own comments. For tips on how to comment effectively to NOP/NOSB <u>click here.</u>

Reminder:

June 26 is the deadline for import requirements for products listed on Annex 1 of the LPO regulation to have an organic certificate issued by a SENASICA accredited certifier.



From the Survey – Minutiae vs Organic Integrity



Canada, from page 7

The Canada Organic Regime (COR) regulations and the Canadian Organic Standards do not cover cosmetics, textiles, Cannabis products, fertilizers, pet food, or natural health products.

The Standards have sections on Apiculture; Maple products; Mushrooms; Sprouts, Shoots, and Microgreens; Greenhouse; Wild Crop; and Insects. The PSL 32.311 7.3 and 7.4 provide much more detail about sanitizers (with or without mandatory removal).

GE definition was updated to include gene editing and synthetic biology as clearly prohibited. Prohibitions are divided into more specific subcategories (genetic engineering, nanotechnology, and cloning). Annex 2 is a useful Decision Tree to use in evaluating materials.

Additions of note – 5.2.4 (Biodiversity) and 5.1.4. (Parallel Production). Parallel production is now allowed for the last 2 years of transition, for example.

Greenhouse Standards! Lots of changes! Name change to **7.5 Crops Grown in Structures or Containers**. The soil volume and mineral fraction are quantified.

Livestock – Tie stalls are to be phased out by 2030. Electric trainers are prohibited. A clause for feed in catastrophic situations (fire, etc.) was added. This creates an allowance for feeding non-organic feed in these cases with limitations on the percentage to be fed (up to 30%) and the length of time (30 days). Indoor space requirements for sheep and goats were added. Some significant changes to poultry in an attempt to get birds outside more. Methionine and lysine from any source were added to the PSL with commercial availability requirement. Organic food waste may be fed, even if only 95% organic.

Processing (Preparation) – Non-organic ingredients are allowed in the 5% in organic label products, although commercial non-availability must be demonstrated. This is a difference between the US and Canada. Commercial availability was also added to some PSL listings. *Sources, OFC website and OTA webinar*

In Memoriam

Margaret Scoles remembers two very special members

George Marcus Danner IV - Jun 03, 1942 - Jan 24, 2021

George Danner was a long-time friend who facilitated my inspection trip to Russia in 2003 with my daughter. We spent two weeks at an environmental science camp on Muraviovka Park. We taught Russian teens English and they taught us Russian (regrettably not too much stuck for many years). He was a graduate U of WI-Madison in Dairy Science and had his own consulting business, Global AgriTech. He consulted in Somalia, Ukraine and the Russian Far East. He served on the board of the Friends of Muraviovka Park which is affiliated with the International Crane Foundation. George inspected for nine different agencies. Most recently, he worked from home, doing reviews for the Montana Department of Agriculture. George enjoyed spending time with his grandchildren, baling hay, gardening and helping friends and neighbors. He is survived by his wife Nancy (57 years) four children, and ten grandchildren.



Jack Reams - Oct. 16, 1936 - Jan 9, 2021

Jack passed away unexpectedly at the age of 84 on Saturday January 9th with his wife of 29 years, Marlene, at his side. For over 19 years, he inspected crops, livestock and processing plants. Jack had a passion for agriculture and farmers that shone through in all that he did. He always said work was his hobby and true to his nature, he worked right up until Friday afternoon, Jan. 8. He loved to travel. Jack and Marlene did inspections together throughout Western Canada and the USA. Colleague Cheryl Laxton says, "Marlene typed every single one of Jack's reports. He had very little interest in technology. If you had the pleasure of meeting Jack, I am



sure you heard him say 'I've gotten this far in life without typing and I'm not going to start now'. He mentored many organic inspectors as well as articling agrologists. He was a kind man with a warm heart, a contagious laugh and always an encouraging word. His interest in history and people and his dedication to agriculture took them to Europe, Asia, Australia, NZ, Iceland, USA, and Canada from coast to coast. Jack is remembered for his genuine interest in people". Jack was an active IOIA member since 2000 and served on the IOIA BOD from 2002-2006 as Treasurer.

IOIA Basic Training - ONLINE!



Basic Crop Inspection Course, February 8 - 12, 2021

Trainers Margaret Scoles and Jonda Crosby received high marks from the participants:

Regarding Margaret: "I could not have asked for a better teacher. She was exceptional in all ways a teacher should be. Especially considering the adaptations to an online learning format. Thank you very much."

Regarding Jonda: "An exceptional and professional teacher and expert in her field. I could not have asked for more in any areas. Feedback was great and teaching style was engaging even in an online format."

We agree: "I was impressed with how well organized the class was. I know that having to do it all virtually especially the inspection field trip posed many challenges. I think while the field trip would have still been better in person, I would actually advocate overall for keeping the class virtual post-pandemic. It was far easier to fit into my schedule than a week of travel to a distant location. And the ability to work on documents collectively was something I haven't done before but was an interesting way to learn."

And we DO read every course evaluation for comments like these, so that we can continue to add to the information we include in our courses and help people succeed in achieving their inspector-career goals: *"I definitely feel I have a good foundation to go out and take the next steps. But I would say that is the one area I would have liked to see discussed more - what is the next step for all of us. I know it will look way different for everyone depending on their region and their own goals. But in the most general terms, how does one go about setting up an apprenticeship? How does the apprenticeship work? How do things work as a contractor - liability insurance, taxes, etc."*

These issues are currently being discussed on the IOIA Town Hall monthly meetings.

Basic Processing Inspection Course - February 22 - 26, 2021

Trainers Garry Lean and Luis Brenes garnered two comments from this group, who managed to avoid having their Zoom portraits taken:

"Whew! That was intense! Thank you guys for teaching this class. I look forward to learning more from you."

And along with a suggestion to re-arrange exam lengths: "IOIA courses have notoriety for being brutal." (It's true!)

101A Basic Training - ONLINE!

Basic Livestock Inspection Course March 8 - 12, 2021 Trainers Garry Lean and

Nate Powell-Palm

"This was a tough course, but I learned so much. I will always have more questions and experience will be an excellent teacher, but I have a strong baseline to work with and the resources necessary to grow and learn in this work."

"Nate was an excellent facilitator and demonstrated deep knowledge of the subjects covered. His style was relatable and his use of real world examples was very helpful. His tech skills were excellent and providing resource links in the chat in real time were very helpful."



Top line 1: Bridget Higgins—> Nate Powell-Palm—> Chris Elder Line 2: Garry Lean—> Wendi Jennings —> Isabel Cochran Line 3: Matthew Molyneaux—> Matthew Rejewski—> JJ Mack Line 4: Clint Shontz—> Rob MacDonald



Basic Crop Inspection Course

March 29-April 2, 2021

Top Left: Margaret Scoles (co-Lead Trainer), Jonda Crosby (Assistant Trainer), Madeleine Dragun, David Fenn Middle Left: Adriana Chavez, Micky Ellenbecker, Mario Maldonado, Kevin Baily Bottom Left: Peregrine Chase, Adrian Mendez, Nick Cuchetti Missing: Garry Lean (Lead Trainer)

Why should you as an inspector take an OMRI/IOIA 200 level Input Materials webinar? by Doug Currier and Margaret Scoles

When IOIA first envisioned our Training Institute, it was with the expectation that inspectors would take 100-level training (basic training plus standards training). Then, when they had some experience as inspectors or reviewers, they would take additional 200-level training in key topics identified as those relevant for all working inspectors:

- Crop Inspectors would take 200-level training in In/Out Balance & Traceability; Crop Input Materials; and Assessing Biodiversity & Natural Resources on Farms.
- Livestock Inspectors would take 200-level training in Feed Audit in Grazing & Non-grazing Season; Livestock Input Materials; and Assessing Biodiversity & Natural Resources on Farms.
- Processing Inspectors would take 200-level training in In/Out Balance, Traceability, & Recipe Verification; Processing Input Materials.

These would be provided in webinar format to make them accessible and affordable. We would make them rigorous and meaningful by adding preparatory assignments and post-exams. We partnered with key organizations that brought expertise to develop the courses. We partnered with OMRI for input materials in all 3 scopes to the NOP regulation. COR courses followed shortly. OMRI provided the expert content and IOIA provided guidance in what would be helpful for inspectors. Each OMRI/IOIA webinar is peppered with "Inspector Take Away!" and "Red Flags".

Yet, almost a decade later, many inspectors have taken advantage of few or none of these opportunities for continuing education. Why? Perhaps because inspectors generally view their role as limited to "verify and report". Are the materials in use the same as what is in the OSP? If not, issue of concern. Have materials not reviewed by the certifier been used? If so, issue of concern. After all, it is the certifier's job, not the inspector, to review and approve materials. Right?

While it is true that the certifier is responsible for reviewing and approving input materials, the inspector must carry an amount of material review knowledge to ensure this responsibility is effectively exercised. There must be a healthy balance between an inspector completing full material review on-site and making decisions on compliance (not OK) versus knowing enough about material review in order to document concerns in the exit interview (not only OK, but recommended).

During the 2020 ACA Training "Sharing our Perspectives session", the following outcome was identified by certifiers for IOIA training. "Input training for inspectors and certifiers have continued to advocate for material training of inspectors, but inspectors often indicate that this is not useful".

And, again at the 2021 ACA/IOIA Training, during Sharing, a similar concern came up. "Inspector Training on what to look for/review and what should be collected on site when confirming/documenting input material use issues".

OMRI Presenters



Doug Currier Technical Director



Peter Bungum Senior Technical Coordinator



Tina Jensen Augustine Technical Coordinator



Phoebe Judge Technical Coordinator

Why should you as an inspector take an OMRI/IOIA 200 level Input Materials webinar?

Is there a disconnect between inspectors and a certifier's review staff? Why do certifiers want inspectors to know more? Certifiers are apparently not getting adequate, consistent, timely information from inspectors regarding problematic material use. And, equally surprising a recent inspector survey indicates that inspectors have been asked to determine compliance status of input materials, on site.

- When prohibited materials are used, it is urgent that certifiers are notified right away. When an inspector can identify prohibited materials, certifiers will get information in time to prevent contaminated products from being sold. It can be problematic if a material is prohibited and not identified as such in the exit interview.
- Certifiers don't always handle materials issues the same. Some certifiers allow inspectors to up- date Input Materials lists; others do not.. Both OMRI and IOIA encourage the inspector to communicate with certifiers to learn their expectations.
- There is also certifier variation on how Input Materials lists are maintained Certifier A wants inputs list to include all inputs that producer could possibly use while Certifier B wants an inputs list that includes only materials currently in use.
- Should photos be taken of prohibited substances on site? Yes, photos help the certifier prepare a response to their clients.

The bottom line - make sure you communicate with the certifier.

In 2021, IOIA and OMRI are offering input materials training in all 3 scopes in COR and to livestock and processing materials in . These trainings are interactive. Questions are welcomed and the presenters are all experts. And if you haven't used your once-per-year member webinar 50% discount, this is a great time – price is \$150 at half off.

- 200 Level IOIA/OMRI Webinar May 19 COR Processing Input Materials, Doug Currier.
- 200 Level IOIA/OMRI Webinar June 8 COR Crop Input Materials, Peter Bungum.
- 200 Level IOIA/OMRI Webinar July 28 COR Livestock Input Materials, Peter Bungum.
- 200 Level IOIA/OMRI Webinar September 15 NOP Livestock Input Materials, Phoebe Judge.
- 200 Level IOIA/OMRI Webinar November 4 NOP Processing Input Materials, Tina Jensen Augustine.

Watch next issue for a technical article by Doug Currier on input materials and inspection.



From the IOIA Inspector Survey March 2021

WINTER/Spring 2021

Annual Report 2020 Summary



"Best Photos of 2020"

Top: Advanced Training group, Texas, January 2020

Center: Basic Crop Training, Mexico, February 2020

Bottom: Asia Pacific Committee training, Thailand, January 2020

We're all looking forward to the time we can meet in person again!





Annual Report 2020 Summary

International Organic Inspectors Association Balance Sheet (Cash Basis) As of December 31, 2020		
ASSETS	Dec. 31, 2020	Dec 31, 2019
Current Assets		
Total Checking/Savings/CDs	399,241.19	390,311.21
Accounts Receivable	-224.08	50.92
Total Other Current Assets	20,410.16	108,660.55
Total Current Assets	419,427.27	499,022.68
Fixed Assets Total Building	38,768.86	38,768.86
Other Assets		
Accumulated Depreciation	-20,012.23	-18,854.19
TOTAL ASSETS	\$438,183.90	\$518,937.35
LIABILITIES & EQUITY		
Equity		
Contributed Property-FMValue	29,031.80	29,031.80
Restricted (Scholarship Travel Fund)	1,598.00	1,598.00
Retained Funds	488,307.55	486,250.23
Net Income	-80,753.45	2,057.32
Total Equity	438,183.90	518,937.35
TOTAL LIABILITIES & EQUITY	\$438,183.90	\$518,937.35

NOTE: The Board of Directors approved a balanced budget for 2020, with the expectation of a -\$85,000 bottom line. Members at the 2020 AGM were told that we expected to invest approximately \$85,000 in the Information Management System Technology upgrade, so we might have a -\$85,000 bottom line for 2020. The actual bottom line was -\$80,753.45. About half of that went to the technology upgrade and the other half can be attributed to training shortfall due to Covid and no in-person training events after February. Without a cash reserve, we could not have continued our programs. IOIA is accessing and using Covid resources appropriately. A Covid grant from State of MT of \$12,500 was helpful. In 2021, we've already received \$71,316 in forgivable PPP loans. The \$100,000 contract for the OILC Enhancement Project offset much of the loss of gross income in IOIA's Training Program. IOIA also cut operational expenses including all Staff and Board travel after February; and most of the Promotion budget (no expos, etc, and reductions in staff and staff hours).

The infographic on the next page is an awesome snapshot of our 2020 Annual Report!



Board of Directors Minutes Highlights

(full minutes available to inspector members on the IOIA website)

December 1, 2020 4 -7:05 p.m. EST

Attendance: Lois Christie, Janine Gibson, Heather Donald, Ryan Sitler, Rachel Myers, Chuck Mitchell, Philippe Descamps, Others: Margaret Scoles, ED and Angela Kahl.

Latin American Committee The change in the hosting platform for the forum has spurred discussion of how to make a forum accessible to Spanish language inspectors. Most inspector members in Latin America also speak English, resulting in very limited participation in past attempts at a Spanish language forum. **Philippe** moves to allow non-inspector members to participate in the Spanish Language forum. Motion carries.

Treasurer's Report & Draft Budget - Rachel moves to accept the draft budget in principle. Motion carries. **Janine** moves to approve the ability of the Fundraising Committee to approach the Board regarding reinvesting a portion of funds from successful fundraising back into fundraising initiatives. Motion carries. **Fee Schedule for Certifier Member options** – Staff Inspectors under a Certifier Member get access to all member benefits except voting rights, they can't run for the board, and they aren't listed in the directory. This year, benefits have grown to include the Town Hall Meetings, raising the question of whether staff inspectors should have access to these benefits and if the membership fee should be increased. Benefits need to be tangible to appeal to the younger range of inspectors and provide incentive for membership. **Rachel** moves to increase the membership dues for certifiers to a base fee of \$540 and \$150 additional per staff inspector. Motion carries. **Janine** moves to approve the IRS Form 990 as submitted on 11/16/20. Motion carries.

Newsletter Planning Discussion on revising the format of the newsletter. The newsletter is valued by the membership. IOIA will continue with the quarterly newsletter, do an analysis of time spent creating the newsletter, and look into other formats (i.e. podcast) that will expand membership services.

Membership Recruitment & Services - Margaret and **Lisa Spicka** have developed letters to send out and a spreadsheet of potential members with resulting membership income.

Inspector Co-Op - Angela Wartes-Kahl presented. In response to OTCO & CCOF moving to staff inspectors and the NOP's memo on human capital, **Nate Powell-Palm**, **Garth Kahl**, **Angela**, and some others began working on the Coop idea that was first mentioned at the 2020 AGM. Angela connected with the U.S. Federation for Worker Cooperatives for support in developing the structure and going through the process of forming a coop. A small IOIA committee has been formed to update the IOIA mentorship program. IOIA remains as the main training organization. The BOD thanked Angela for her work on this initiative and for presenting to the BOD.

January 12, 2021 4:00-6:00 p.m.

Attendance: BOD: Lois Christie, Janine Gibson, Heather Donald, Ryan Sitler, Rachel Myers, Chuck Mitchell, Others: Margaret Scoles, ED and Amanda Birk

Amanda Birk & Mentor Committee. Amanda, as Chair of the Mentor Committee, presented to the BOD. The committee was originally formed to address the lack of quality inspector mentorship opportunities, as well as appropriate compensation for mentors. They would like to encourage the BOD to grasp the opportunity for change that has come with the recent changes & developments in the industry around human capital and the need for highly trained inspectors - to reexamine IOIA's organizational vision and redefine the ourselves to fill the needs of a growing industry, which would include a new mentorship program. They feel the sustainability of such a mentorship program will be dependent on the leadership of IOIA in developing and administering the program. They would like to see an investment towards these changes in the form of a facilitator to guide our new strategic visions (including a mentorship program) and increasing hiring capacity – an additional staff person(s) to lead fundraising and grants, and the mentorship program.

Fundraising Proposal The Charitable Donations Acceptance Policy was reviewed and was accepted by the BOD in draft form, to be reviewed again in the future. The Fundraising Proposal was reviewed and discussed. The Fundraising Committee will meet again to provide further detail. The BOD will review and discuss again at a future date.

Treasurer's Report Janine moves to accept the 2021 Budget as amended. Motion carries.

February 16, 2021 4:00 -8:00 p.m. EST (Strategic Planning)

Attendance– BOD - Lois Christie, Janine Gibson, Heather Donald, Ryan Sitler, Rachel Cherry Myers, Chuck Mitchell, Philippe Descamps; ED – Margaret Scoles; Other – Terrance Layhew (Moderator) and Teri Lindberg (Executive Assistant)



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KEEP IOIA STRONG - LEND YOUR STRENGTH AND GET INVOLVED!

2021 Calendar

Most live events have moved to a virtual platform at this time. Please check your favorite event's website for updates.

April 20 - 30 NOSB Online Meeting - NOSB Spring 2021 Meeting webpage

April 22 - Earth Day

June 3 - IOIA/ACA Sharing Session The first of 2 quarterly sharing sessions open to inspectors and certification staff to discuss timely tips and tricks with remote and hybrid audits.

September 8 - 10 20th IFOAM Organic World Congress, Rennes, France.

September 22 - Natural Products Expo East will be taking place in Philadelphia, PA. 9:00am to Saturday, September 25, 2021 - 5:00pm

October 13 - 15 Food Policy Forum for Change at the upcoming High-Level Special Event of the Committee on World Food Security (CFS) on Tuesday 13 October 2020 4:30pm - 6:00pm (CEST). The event is public and free of charge, and will be held online on Zoom.

Please see pages 2 & 3 for the current list of IOIA Live Online, onsite, webinar and Self-Directed Training Opportunities