

Local Farmer Food Safety Training Debuts in Costa Rica *How PrimusLabs™ and IOIA Are Making FSMA Work for Small Growers and Organic Inspectors*

Shortly after the Food Safety Modernization Act (FSMA) was signed into law, PrimusLabs™, an accredited USDA organic certifier providing food safety audits and training, initiated its *Local Farmer Program* to provide small producers with tools to verify food safety with buyers through 2nd party auditors, known as **Regional Independent Verifiers (RIV)**. IOIA was recruited to help meet projected demand for up to 10,000 small farmer verifications by offering RIV training through its network of organic inspectors.

During the 2014 IOIA Annual Meeting in March, IOIA trainer Karen Troxell delivered an on-site RIV training pilot to 26 RIV prospects, introducing inspectors to this emerging market in food safety verification.

Backstory

The Tester-Hagen Amendment to the FSMA exempted certain small U.S. producers from 3rd party GAP auditing and survived passage. However, as rulemaking adds flesh to the bones of FSMA, associated regulations may prove

especially challenging for smaller growers of food for human consumption. Additionally, buyers are expected to demand food safety verification from all suppliers, creating a quandary for growers. PrimusLabs™ developed The *Local Farmer Program* to provide small local growers an affordable means of meeting the emerging market for appropriate food safety measures through a new network of Regional Independent Verifiers. IOIA is now an authorized *Local Farmer* RIV trainer.



Local Farmer is a five-step program already securing support from some major U.S. distributors and retailers. Retailers who would otherwise require a full GAP audit for growers below the mandatory FSMA limit have expressed willingness to accept verification by RIVs. It is specifically designed for farmers operating below current FSMA GAP limits. Producers qualifying for the program must grow and sell produce (meat and eggs are not included), operate below an annual sales threshold of \$500,000.00 for three years prior, and distrib-

See **RIV**, page 2

Notes from the Chair

By Ib Hagsten



If you were not in Costa Rica for IOIA's AGM, Advanced Training, Field Trips, and/or NOP Training by Miles McEvoy and Betsy Rakola, Agricultural Marketing Specialist, (with simultaneous translation into Spanish), you missed a grand event in a lovely setting.

I'm told by the old-timers (who have been around a lot longer than I have), that our AGM this March was "the best ever." From observations of the energy and enthusiasm exhibited by the BOD members, the dialogue and input by the majority of attendees, the hard-working and engaged break-out group discussions, plus the funny and tender memorial celebration of Phil Hale, a founding member of IOIA, artist, and a recent resident of Costa Rica, it is clear that this gathering was memorable.

See **Notes**, page 4

2013 IOIA AGM Wrap Up and Annual Report Now Online

Find them both at <http://www.ioia.net/AGMReports/2014AGM.html>

Membership Updates

Welcome New Supporting Individual Members:

Kelsey Ducker
 Joshua Fitz
 Lacey Mae Harper
 Russell Hatz
 Mary King
 Emily Musgrave
 Alexandra Painter
 Julia Riske
 Rose Starkey

Welcome New Supporting Business Member:

Carla Wright, Organic Processing Institute

IOIA BOARD OF DIRECTORS

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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.
 Editor: Diane Cooner webgal@ioia.net
 Deadlines: Feb 1, May 1, Aug 1 & Nov 1.
 Published quarterly on recycled paper.

RIV from page 1

ute most of their product within a 275 mile radius to local markets such as CSAs, farmers markets, restaurants, and institutions.

The five steps for the producer are to:

1. Attend food safety training
2. Develop and implement a Food Safety Plan
3. Conduct an internal self-audit
4. Secure an audit by a 2nd or 3rd party RIV
5. Secure an external GAP or HACCP audit by a certified 3rd party.

The *Local Farmer* program is open to all qualifying growers, including organic and non-organic growers. There is no requirement for organic growers to be certified organic by PrimusLabs™ to have a *Local Farmer* RIV 2nd party verification. The program is open to all qualifying growers upon payment of an annual fee. PrimusLabs™ projects participation of up to ten thousand farmers in the first year - each potentially utilizing RIVs.

Inspectors and Verifiers: A Natural Fit

RIV instruction is designed to build an understanding of factors affecting food safety, how risk is managed on farms producing fresh produce for direct sales to consumers, and how small producers can be expected to self-verify through the *Local Farmer* Verification Guidelines. Verifiers will also learn the requirements of conducting a 2nd party food safety audit and the role of traceability in food safety audits.

"Karen (Troxell) was a very good presenter of the materials, her answers were quick and clear. And as a fellow inspector, I feel very confident I am prepared to do these verifications well." – RIV course evaluation comment, Costa Rica

Organic inspectors are uniquely positioned to comprehend what is required for 2nd party verification including: farmer self-inspection preparation, traceability, ground history, adjacent land, fertilizer and



IOIA RIV Training Team at PrimusLabs California. L to R: Stephen Bird Organic Inspector and Food Safety Auditor, Caroline Bird Organic Farmer and Educator, Karen Troxell The Organic Consulting Firm Organic Inspector, Dr. Joe Montecalvo Food Scientist & Organic Inspector, Juan Muñiz Director of Operations PrimusLabs; Jonda Crosby IOIA Training Services Director; Kathy Bowers IOIA US Training Services Coordinator, and Courtney Cox PrimusLabs Auditor and Local Farmer Program Development / Quality Assurance

crop nutrition, irrigation and water use, crop protection, field worker hygiene, and harvesting practices. Over 100 relevant food safety resources delivered in the training give inspectors an extra leg up in building RIV work.

“Although I likely will never do 2nd party audits, I learned a great deal about food safety that will be valuable on organic inspections, especially as it relates to irrigation water use and harvesting fresh produce.” – RIV course evaluation comment, Costa Rica



Attendees of the first-ever RIV training, Costa Rica

From IOIA Organic Inspector to Regional Independent Verifier (RIV)

To meet demand for 2nd party auditors, IOIA and PrimusLabs™ collaboratively offer our Regional Independent Verifier training program in 2014, rolling out new work prospects for organic inspectors and others with related skills. While many entities, including PrimusLabs™, provide 3rd party GAP audits, only IOIA currently provides training for RIV 2nd party audits. PrimusLabs™ has qualified IOIA as a RIV training body. An RIV Training Team including IOIA Inspector Members Karen Troxell, Stephen Bird, Joe Montecalvo and IOIA staff members Jonda Crosby and Kathy Bowers, has completed the PrimusLabs™ *Train the Trainer* program.

Upon completion of the course, RIV’s are listed on the *Local Farmer* site and producers ready for their 2nd party audit choose an RIV from the list and initiate contact. RIV’s complete on-site checklist reports using *Local Farmer* program standards, adapted to local regulations for food safety. PrimusLabs™ charges an annual RIV registration fee of \$100 to use their onsite tools and a fee of \$40 is assessed for each RIV report uploaded to the website. Each RIV invoices the producer for their verification work.

All inspectors interested in performing RIV verifications and/or those interested in consulting with farmers to prepare them for RIV or full GAP audit will benefit from this course. The course provides rudimentary cross-training in GAP and Harvest Crew verification experience that will help working organic inspectors better recognize food safety concerns on farms.

IOIA’s Regional Independent Verification (RIV) course is available through an on-site full day session or two, 3 hour webinar training sessions. The RIV course is open only to those with previous audit experience. Participants who do not meet the acceptance criteria can qualify by taking additional in-person training. Preparatory training is also available for those without previous inspection or audit experience. Those without inspection background are expected to conduct follow-up witness audits, either with approved RIVs or third party food safety auditors. The course is recommended for organic inspectors or those with combined training and background in vegetable or fruit production systems and training in food safety such as HACCP, GAP, GMP. Other qualifying skills include auditing, food science, non-GMO and humane animal inspection.

“I will be using this course immediately as an RIV, thank you IOIA for providing this opportunity and for the excellent training.” – RIV course evaluation comment, Costa Rica

Note: Organic Certifying Agencies can participate by offering RIV services and are encouraged to process fees to keep organic inspectors from encountering conflicts of interest. Retailers and distributors who participate in the program can access the site to determine qualifying producers or monitor progress.

To register for a webinar course please go to: http://www.ioia.net/schedule_list.html

To accommodate busy inspector schedules IOIA is offering the following webinar times and dates:

1. Evening Webinar Option: 4pm-7pm PDT Friday July 25 & Friday August 1.
2. Friday & Monday Webinar Option: 9am-12pm PDT Friday August 8 & Monday August 11.
3. Friday & Saturday Webinar Option: 11am-2pm PDT Friday August 15 & Saturday August 16.

IOIA anticipates an in-person RIV training yet this year – check our training schedule on our website for dates and time. ☺

Notes, from page 1

There were field trips, such as the trip to Dole's pineapple plantation and processing plant; side trips to the hot springs or the volcano; and opportunities for strolls down the street or paths where a myriad of unique and colorful animals, birds, bugs were visible during the daytime or during the evening; and the frequent "dip" in the on-site pool where myriads of intellectual and humorous conversations took place among new and old friends within IOIA membership.

Miles McEvoy, the deputy administrator of NOP, and Betsy Rakola, the ag NOP ag marketing specialist who provided the training in Spanish, had the full attention of the fifty attendees for two days from ten South and Central American countries, representing 12 certifiers or government agencies. The advanced training was the best-attended session in many years and the program was powerful and highly rated.

The election of BOD members also ended up being most unique, since despite having highly qualified replacement candidates present, the membership voted to keep the current BOD intact, i.e. Stuart from Canada and Isidor from the Republic of Korea were re-elected. Now that we, as a board, already know one another and complement one another's skill sets well, I am confident that you, the members, will have ample opportunity to be proud of this BOD when we meet together next March in Montana for the 2015 annual meeting and associated training sessions.

The staff is fully engaged; all positions are filled with capable and enthusiastic women and one man. Margaret continually brags on her staff members when she and I confer about IOIA business and/or issues, and she is so comfortable with the BOD members' engaged and participatory demeanor

that she has been heard to say, "I'm so fortunate with the inner circle of men and women with whom I interact regularly."

The IOIA training schedule is running at "full speed" for all levels (100, 200, 300), and all types (in-person, webinar, IOIA-managed, cosponsor-managed, and multilingual) due to an adequate array of multi-disciplinary trainers plus great in-house support staff. 2013 was a banner-year and 2014 may break all records!

Now that spring is upon us and the crops are growing (at least on mainland US), those of us who do farm inspections are getting really busy with one of the most rewarding experiences, namely getting to invest half a day with a farmer, his family, and his growing world of crops and/or livestock.

Those of you who conduct processing or handling inspections, possibly year-round, have the opportunity to be invited inside the corporate walls and experience an array of corporate cultures. (I reflect on a plant where one of four "corporate rules" posted on the wall was "Laugh a lot" compared to another plant where laughter was scowled upon).

On behalf of the office staff and the board of directors I wish to *Thank very much any and all of you who in small or larger ways support IOIA as volunteers and/or committee members/chairs!!!*

We are especially indebted to Luis Brenes for his dedication and tireless hours of help in both the planning and execution of logistical arrangements for the meetings and to Diane Cooner, our Costa Rican-based IOIA webmaster, who was present and did a tremendous amount of "behind the scenes" work to make the meetings flow. ☺

Committees Invigorated with New Leadership

IOIA is pleased to announce new leaders that have stepped forward to head two committees. **Mutsumi Sakuyoshi** of Japan will be chairing the new **IOIA Asian Committee**. **This committee** is sponsoring monthly conference calls for Asian members via Skype.

Juan Carlos Benitez of Ecuador has agreed to chair the **Latin American Committee**. This committee will be working with the Spanish language Forum. We are pleased that members in these regions will now be able to share information and experiences as the members on the English language Forum and Canadian Member Forum are already doing.

JOIA Reorganizes

IOIA's sister organization, Japan Organic Inspectors Association (JOIA), has reorganized their association to better serve organics in Japan. JOIA started in 1997 as a volunteer organization, and later registered in 2000 as a non-profit.

However, due to changes in the marketplace, including a general slowdown in organic certification and in more certifier staff fulfilling formerly independent inspector roles, JOIA found that to keep economically viable they needed to shift their focus.

They have therefore ceased operations as a non-profit, since last fall, and now have reopened as a general company, effective April 1, 2014.

JOIA will still be conducting and facilitating trainings for new inspectors and certification bodies, and working to grow organic in Japan. To read their letter to IOIA members, please go to the Announcements section of the IOIA website, or [click here](#).

Notes from the ED

by Margaret Scoles

If it had not been eclipsed by the most awesome annual meeting ever, I could say the most fun event of the quarter was IOIA's "Join the IOIA Team" event in Anaheim during Expo West on March 8.

The idea for the social was born in our Fundraising Committee when we pondered the huge potential for growth of supporting membership. Kathy Bowers (US Training Services Coordinator) traveled with me from the IOIA office to Anaheim. She planned the food and beverage at the Tangerine Grill. Pam Sullivan, BOD Treasurer joined us. Chris Kidwell, Membership Committee Chair, and member Tom Page joined us to help staff the IOIA booth. I quote Chris, "I always wondered why we needed to be here, but now I see. We really need to be here!" He noticed that although there are 1000's of people looking at and selling organic foods, the number of booths where people can ask hard questions about what organic means are woefully few. IOIA provides a service as a technical information booth.



Tom Page, Pam Sullivan, Maarten Samsom, Margaret Scoles and Chris Kidwell at the IOIA Booth, Expo West 2014

After I spoke at our party about IOIA - our goal to increase supporting members, including sustaining and patron membership; and our activities including our food safety initiative -

others spoke up. I talked about what IOIA could do with more industry support. The voices that followed after me were more impressive. Our guests stated the reasons why IOIA deserved industry support. A long-time supporter of IOIA and member of the OTA BOD, Kelly Shea spoke about the importance of quality inspections and of IOIA's role in making sure inspectors are well-trained. Peggy Miars, Executive Director of OMRI, a Supporting Business Member, talked about the longstanding collaborative relationship between our organizations, including the launching of the IOIA/OMRI COR Input Materials webinar series this year. Katherine DiMatteo, from Wolf, DiMatteo, & Associates, a Supporting Business Member, spoke up too, as did David Gould, IFOAM Value Chain Facilitator & North America Representative. I was simply bowled over by the amazing things that our guests had to say about us. Other guests included Supporting Certification Agency members Nova Sayers, (NSF QAI) and Scott Rice (WSDA, and president of ACA); Carmela Beck of Driscoll's Strawberry Associates, a Supporting Business Member, and also a NOSB member. Mostafa Chtaini of California and Morocco, who is working with IOIA to bring inspector training to Morocco, was delighted to meet Jim Gerritsen, the president of OSGATA, in his quest to find organic seeds. Other surprise guests were David and Jean Vetter, who hosted the field trips at the OCIA/OGBA training in Nebraska where IOIA elected our first BOD in January 1992.

So many IOIA members attended, too - including Kelly Monaghan of Ontario, IOIA's representative on the CGSB Organic Technical Committee; Bill Barkley, IOIA Canadian Committee Chair; Maarten Samsom of Vermont, past IOIA membership Committee Chair and past BOD member; and Chris Kidwell, Membership Committee Chair.

Philip Hale - In Memoriam

Philip Hale of Ohio and Costa Rica passed away on February 14, 2014, of a heart attack. A founding BOD member of IOIA, designer of our first logo, and one of IOIA's very first accredited inspectors, Philip will be remembered for his dedication to bringing the fledgling organization of IOIA into being and for his work in initiating the IOIA Scholarship program. He was a key person in the founding of IOIA. He was an inspector for 25 years, an artist and member of the Midwest Painter Group, IOIA trainer instrumental in beginning training in Japan, and an excellent mentor to many new inspectors. His great loves were his wife Yamile and painting.



He was remembered at the closing of the 2014 AGM with spoken remembrances from colleagues (including past fellow board

members Rick Martinez and Gabi Soto), followed by a silent slide show. His wife Yamile opened the tribute by explaining that their 12th anniversary would have been the next day, March 23. The slide show ended with a short video of Philip painting in the street in full artist garb and another slide show of images of his paintings. His family arranged an art exhibit of his paintings in the annual meeting room. Yamile was presented with a lovely handmade card filled with remembrances from Philip's friends at the Japan Organic Inspectors Association. The card was hand-delivered by Isidor Yu.

He was doing on what turned out to be his last day what he loved most -- painting. He will be sorely missed and forever remembered by his IOIA friends, especially for his outrageous and fun sense of humor.

[Link to Tribute](#) [Link to Obituary](#)

SECTOR NEWS**Texas NOSB Meeting Observations**

by Ib Hagsten, Ph.D.,
Chair of IOIA

IOIA, represented by the Board Chair, Ib Hagsten, was in attendance at the April 29-May 2 San Antonio meeting to present comments to both the NOP and the Certifiers for the excellent cooperative ventures in the past year of making the inspection process more "Sound and Sensible."

At the start of the NOSB's hard-working meeting on Tuesday, the unsettling demonstration by the Organic Consumers Association took place. Reasoning by Mac Stone, NOSB chair, and hotel security did not deter their chanting and demonstration. Only the much-publicized arrest and carry out by police of their Political Director ended the disruption.

The primary objection by OCA was "Don't Change Sunset," which references the so-called "Sunset-rule" for non-organic ingredients used in organic production, like Methionine in poultry diets or Carrageenan in processing. Coinciding with the government shutdown last fall and the subsequently canceled fall NOSB meeting, NOP announced a procedural change to the Sunset Rule that would allow for more efficient NOSB actions on the now more than one hundred products that must be reviewed at least every five years.

The reason Miles McEvoy was shown next to Mac Stone in the published pictures was a change in seating from prior meetings. Miles, in order to better see and hear the two days of public comments, and per the FACA regulations that allow NOP's Deputy Administrator to co-chair the NOSB meeting, he was sitting in the center of the U-shaped NOSB/NOP-staff tables facing the large crowd of interested public. Since Miles did not in any way interfere in Mac's conducting

of the meeting, it was only a minor change that some attendees found perceptually unsettling.

In summary (1) the NOSB as a group of hard-working and dedicated volunteers conducted admirable work on behalf of our industry (despite the "rocky start"), (2) the NOP staff present diligently made the meeting run smoothly, and (3) the unusually large number of individuals speaking up and answering questions in front of the NOSB is a clear indicator of an engaged organic industry.

NOSB Decisions

by Margaret Scoles

A complete transcript of the April 29 - May 2 NOSB meeting will eventually be posted on the NOP website. Final recommendations will be posted in the near future at www.ams.usda.gov/NOSBMeetings <http://www.ams.usda.gov/NOSBMeetings>.

Some significant NOSB decisions:

A proposal to extend the allowance of streptomycin to control fire blight in organic apples and pears until October 2017 failed (8 yes, 7 no). Expiration date of October 21, 2014, will remain and Streptomycin will be prohibited after this date. The result is the loss of streptomycin in organic apples and pears after the 2014 season.

A proposal for a technical fix to the listing of methionine in organic poultry feed so the allowance is based on an average amount per ton of feed over the life of the flock was sent back to subcommittee.

At the end of the meeting, NOSB announced its tentative work plan

for the fall 2014 meeting. The final work plan will be approved by NOP and posted on its website. The work plan reviewed at the meeting can be viewed here:

http://images.magnetmail.net/images/clients/OTA_Com/attach/Fall-2014Workplans.pdf.

Congratulations to Dr. Jean Richardson (Environmental Rep), who was elected as next chair of NOSB. Dr. Richardson is an IOIA Inspector Member.

Educate Yourself on the Sunset Process Changes

Here's the official document (link below) that explains what happened with the Sunset Process and why. <https://www.federalregister.gov/articles/2013/09/16/2013-22388/national-organic-program-sunset-process>

Vermont Governor Signs GMO labeling law

On May 8th, Governor Shumlin signed H.112, Vermont's GMO labeling bill), into law on the steps of the State House. The law, which would make Vermont the first U.S. state to enact mandatory labeling of foods made with genetically modified organisms, or GMOs, received final approval from state lawmakers on April 16.

The Vermont House of Representatives and Vermont Senate approved the measure, which requires foods containing GMOs sold at retail outlets to be labeled as having been produced or partially produced with "genetic engineering."

see GMO, page 13

CANADIAN ORGANIC NEWS**IOIA Goes to Ottawa**

by Stuart McMillan

On February 3, 2014 representatives of IOIA had the pleasure of meeting with the Canadian Food Inspection Agency, Canada Organic Office (COO) in Ottawa, Canada. Founding board member Monique Scholz, current Board of Directors Vice-Chair Stuart McMillan and Training Services Director Jonda Crosby met with the entire full time COO staff and some staff who are shared between departments. The purpose of the meeting was to foster dialogue between IOIA and the COO. While IOIA has clear communication avenues with the USDA NOP, in Canada it has been individual IOIA members, not the organization, who have had most interactions with the COO. The goal for greater communication was partially a result of the IOIA membership survey. Inspectors were given an open forum to provide feedback to the organization. Some members felt that IOIA does an excellent job of communicating information about changes in the United States but not as strongly in Canada. IOIA looks forward to clearer lines of communication with the CFIA so we can better inform members of developments and changes impacting their important work.

Additionally, we wanted to take the opportunity to bring forward concerns that have been raised by verification officers to the organization over time. (In the Canadian regulations organic inspectors are referred to as verification officers.) The primary issue was the inconsistent training and ongoing educational expectations across Canadi-

an certification bodies. We were able to show the level of detail that IOIA has put into the development of our training system and specific advanced modules. The CFIA and IOIA recognize that inconsistent trainings lead to inconsistent inspections, which obviously impacts the entire organic certification process.

Some of the issues related to fraudulent along with canceled and suspended certificates. For example the lack of a clearing house for fraudulent certificates within the COO website was raised. Currently, inspectors receive notification of these certificates in a piecemeal fashion from some certification bodies, but not all. One issue that has been raised in the past is in the manner that canceled and suspended certificates are listed that does not facilitate easy confirmation by verification officers during our on-site visits. Other issues raised related to the inconsistent certification of brokers and traders, some of whom are performing repackaging actions.

The primary goal was not to inundate the CFIA COO with a long list of concerns and issues. Many of the topics discussed were really outside of inspector's role. They would need to be addressed by the accreditation bodies or the CFIA and the certification bodies. IOIA's primary goal was to explain our ever expanding training modules, our investigation into inspector accreditation, and work to ensure organic integrity is maintained by qualified individuals. One highlight towards the end of the meeting was a comment from Valeriya Staykova, Lead Auditor for the COO. "Your concerns will not stay in this notebook; they will be

brought forward to the certification bodies".

The meeting was an important first step and IOIA looks forward to ongoing dialogue and communication with the CFIA. It was made clear to the CFIA COO that IOIA members are a tremendous resource of information that has not been utilized to the full extent possible. Independent inspectors see the range of policies and practices of certification bodies. The CFIA was clear that they want to hear from inspectors.

Additionally, they reassured us that in the past year they have strengthened their policies surrounding anonymous complaints and assurance that any inspectors bringing forward concerns should be afforded a high degree of protection and anonymity. Feel free to continue to communicate concerns, observations and ideas for improvement to both IOIA and the CFIA.

OPR Changes Coming

Canadian Organic Trade Assn (COTA) has confirmed that the Organic Products Regulations (OPR) will be annulled and rolled into the Safe Food For Canadians Regulations, the most significant change for Canadian organic products since OPR came into force in 2009. The streamlined Safe Food For Canadians Regulations will include the food and beverage regulations that govern organic, commodities, and marketing boards. The regulations may bring a full spectrum of implications for the organic sector, with potential for rules that trump our organic standards, as well as incredible opportunities to tighten the regulations and enforcement.

IOIA's 2015 Annual Meeting in Montana – come to “Big Sky Country”!

This is the first annual meeting ever to occur in Montana! Although it was a close race between New Orleans and Chico Hot Springs, Chico won out both with the email general membership survey and the BOD. The BOD recommended the venue to the 2014 meeting in Costa Rica, and the AGM validated the choice. One factor in the decision was that potentially every staff member of IOIA could attend. Chico is always close to the Canadian prairies, where no IOIA AGM has yet occurred. In prairie terms, the venue is reasonable driving distance from Calgary, Regina, or Saskatoon.

Chico Hot Springs Resort, in Pray, Montana, is a cozy and historic hot springs in a rural setting located in the beautiful Paradise Valley just north of Yellowstone National Park (YNP). YNP is widely held to be the first national park in the world, and the area abounds in western and natural history. The valley is famous both for the beauty of the snowcapped mountains and for geothermal activity which is associated with the Yellowstone region. 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. No chlorine is used in the water.

The Annual Meeting will be March 28, 2015. Advanced training is tentatively scheduled March 26-27. The reserved room block includes a few days after the AGM to allow members to enjoy the surrounding area or just relax and enjoy the waters. The modern but rustic Conference Center will be entirely available to IOIA and includes a cash bar for the AGM.



Potential field trip sites include a ranch with the largest herd of Ancient White Park (heirloom) cattle in North America. Montana features a wide variety of organic production including goat cheese, beef, pork, lamb, greenhouses, vegetables, grain, pulses, and forage crop operations.

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 – I-94 & I-90. The train plus carpool could be feasible with some advance planning. Closest Amtrak station is straight north at Shelby (about 300 miles). IOIA will arrange van shuttles and assist carpools from the Billings and Bozeman airports.

Put this opportunity to attend the IOIA Annual Meeting and one of the most impressive National Parks in the U.S. on your calendar for 2015!

Food and beverage offerings include the western-style Chico Saloon with live music on Friday and Saturday; The Dining Room at Chico, long noted as one of the region's best restaurants; and the Poolside Grill for lunch and dinner (more affordable offerings). Chico also has a geothermal greenhouse and provides organic and sustainable locally raised food from area farmers and ranchers. A variety of lodging options include old-fashioned rooms in the main lodge with antique furnishings and bathrooms down the hall for around \$80/night to similar rooms with a private bath for about \$100/night to fully modern rooms for up to \$134/night. (Note: None of the rooms have TV; this is a place to “get away from it all”.) Wireless internet is available throughout most of the facility although there are some dead spots for internet and cell phone service.

Recreational activities at Chico abound. The venue is pet friendly. For more about the venue - www.chicohotsprings.com For more info about Yellowstone Park www.nps.gov/yell/index.htm

On-Site Training Schedule

California Crop and Processing Inspection Courses: Processing – July 14-18 /Crop – September 8-12

IOIA will sponsor Basic Organic Crop and Processing Inspection Courses in southern California. Each course is 4.5 days long. Basic Processing inspection training will be held at the Viña de Lestonnac Retreat Center near Temecula July 14-18. Nestled among the rolling hills of the Temecula Valley in Southern California Wine Country, the center is set on 40 acres and offers tranquility, rural peace, and an excellent place to focus on learning. For more information about the venue, see www.vinadelestonnac.com. Deadline to apply for the Processing course is June 6. Location for the Basic Crop inspection training on September 8-12 is Hemet, also in the Temecula area. Nearest airports are Ontario, San Diego, and Los Angeles.

Courses will use the USDA National Organic Program standards as the reference. Application forms and more information about the processing course are now available on the IOIA website. Application forms and more details about the crop inspection course will be available by early June. If you are interested, please contact Kathy Bowers at ioiassistant@rangeweb.net or call the IOIA office at (406) 436-2031.

State College, Pennsylvania - Crop, Livestock, Processing, and Advanced Inspection Courses: September 29-October 10, 2014

IOIA and Pennsylvania Certified Organic (PCO) will cosponsor 4.5 day Basic Organic Crop and Processing Inspection Courses, running concurrently September 29 – October 3. Advanced Organic Inspector Training will follow on October 4-5 and Basic Organic Livestock Inspection Course will be held October 6-10. All courses will be held at The Penn Stater Conference Center Hotel. Application forms and more information will be available soon on the IOIA website.

2014 WEBINAR TRAINING

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

200 Level Webinar – June 4, 2014.
IOIA/OMRI COR Crop Input Materials
 Presenter: Lindsay Fernandez-Salvador

100 Level Webinar – July 15 and 18, 2014. COR Livestock Standards IOIA
 Trainer: Garry Lean

300 Level Webinar – July 17 and 24. Grower Group Inspection & Certification IOIA Trainer: Luis Brenes

200 Level Webinar – July 25 and August 1, 2014. Regional Independent Verifier On-Farm Food Safety Training Trainer: Karen Troxell

200 Level Webinar – August 8 and 11, 2014. Regional Independent Verifier On-Farm Food Safety Training Trainer: Karen Troxell

100 Level Webinar – August 14 and 21, 2014. NOP Crop Standards Trainers: Margaret Scoles & Garry Lean

200 Level Webinar – August 15 and 16, 2014. Regional Independent Verifier On-Farm Food Safety Training
 Trainer: Karen Troxell

100 Level Webinar – August 25 and 27, 2014. NOP Processing Standards
 IOIA Trainer: Stanley Edwards

200 Level Webinar – September 10 and 17, 2014. In/Out Balances, Traceability Tests, and Recipe Verification for Processing Inspection under NOP and COR - IOIA Trainer: Kelly Monaghan

100 Level Webinar – September 16 and 19. NOP Livestock Standards
 IOIA Trainer: Garry Lean

100 Level Webinar – September 18 & 25, 2014. COR Processing Standards
 IOIA Trainer: Kelly Monaghan

200 Level Webinar – October 22 and 29, 2014. In/Out Balances and

Traceability Tests for Crop Inspection under NOP and COR - IOIA Trainer: Kelly Monaghan

200 Level Webinar – October 23, 2014. IOIA/OMRI NOP Livestock Input Materials Presenter: Lindsay Fernandez-Salvador

300 Level Webinar – October 23 and 30, 2014. In/Out Balances, Traceability Tests, and Recipe Verification for Processing Inspection under NOP and COR - IOIA Trainer: Monique Scholz

200 Level Webinar – November 13. Natural Resource Assessment on Organic Farms 9:00 a.m. - 12:00 p.m.
 IOIA Trainer: Garry Lean.

300 Level Webinar – November 18, 2014. Inspecting Organic Wineries
 Presenter: Pam Sullivan.

300 Level Webinar – December 4, 2014. Maple Syrup Inspection
 IOIA Trainer Monique Scholz.



Tilajari Resort Hotel and Conference Center was the site of the 2014 AGM. The hotel is located next to the San Carlos River, near La Fortuna and the Arenal Volcano National Park.

2014 AGM San Carlos Costa Rica



IOIA is fortunate to have engaged the professional translation services of Osiris Abrego, originally from Panama and our 2009 Rutherford Scholarship recipient. She was on-site as support staff throughout the NOP Spanish language training March 18-19 (more on page 13).



Many thanks were in order to Luis Brenes for organizing the AGM on-site details. Margaret presented him with a gift basket that was loaded with Jello brand cook-and-serve lemon pudding (apparently you can't buy it in Costa Rica, and Luis's family loves it). Kathy Bowers from the IOIA office made the basket from a re-purposed lasso, Stuart added wild rice and handcrafted soap from Canada, and Pam contributed pistachios from California.



The group took a short break to sample some organic tequila brought by Lois Christie, and then after a quick announcement by ED Margaret, broke into a conga-line celebration, thanking longtime contractor Diane Cooner (center, below) for "20 years of being on-call for IOIA", with rousing cheers of 'Gracias, Diane!'



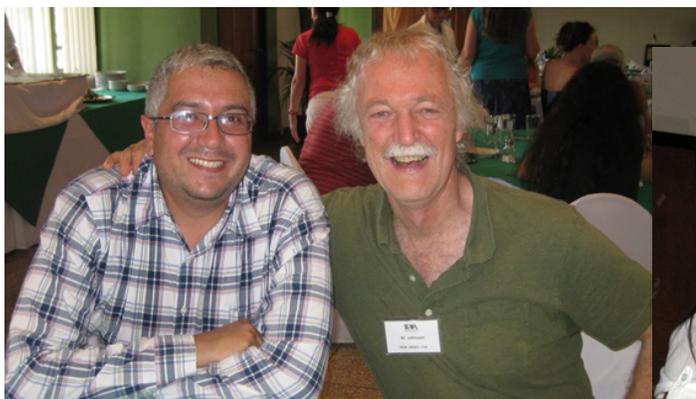
Musician/Inspector Leonard Pollara accompanied on trombone.



Yamile Soto-Muñoz, widow of Phil Hale, joined us at lunch and later for remembrances of Phil



The candidates for the two open positions on the board made their cases for choosing them to serve IOIA.
Stuart McMillan, left - Joe Ward, lower left.
Amanda Birk, center - Isidor Yu, lower right.



Juan Carlos Benitez and Al Johnson.



After lunch, Keynote Speaker Gabi Soto gave her presentation on The Future of Organic. Below, Cheryl Laxton and Amanda Birk.

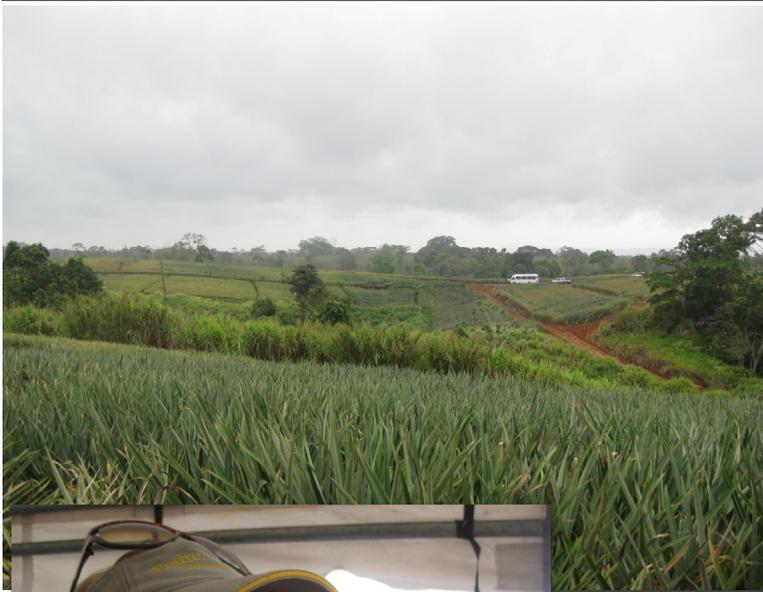


Later in the afternoon after the business portion of the AGM was concluded, the attendees split into groups to discuss three questions:

- 1 - What would make the IOIA Accreditation Program more meaningful and valuable as an inspector?
- 2 - What are the key aspects of a viable and relevant accreditation program?
- 3 - How should an inspector accreditation program be structured?



Winfried and Silke Fuchshofen relax after lunch along with Pam Sullivan.



Field Trip - Dole Organic Pineapple



A special treat of the Costa Rica AGM and Training event was the field trip to Supporting Business Member Dole Fresh Fruit International's pineapple production facilities. We got the full VIP treatment, led by Research Director Ronald González, below far left, and senior Dole staff. The tour included everything from propagation, planting, pest control and

harvesting, to packing shed and of course taste testing! We enjoyed a wonderful lunch after as well!



GMO, from page 6

The Vermont bill also makes it illegal to describe any food product containing GMOs as "natural" or "all natural."

Unlike bills passed last year in Maine and Connecticut, which require other states to pass GMO labeling laws before they can be enacted, Vermont's contains no such trigger clause. The law would take effect July 1, 2016.

Vermont's effort comes as the developers of genetically modified crops and the \$360 billion U.S. packaged food industry push for passage of a bill in Congress that would nullify any state law to require labeling of foods made with such crops.

The Grocery Manufacturers of America announced on May 8 their intention to sue the state of Vermont to stop the bill, which includes the formation of a fund that could pay legal bills. *Reuters/NPR - April/May 2014*

NOP Spanish language training at Tilajari

On March 18-19, over 50 participants from 12 certification agencies or governments from Latin American countries gathered in Costa Rica for the National Organic Program's Spanish language certifier training. The training was initiated in March 2013 at the IOIA Annual Meeting, when IOIA invited Miles McEvoy. McEvoy responded that if IOIA could bring the certifiers to the training, the NOP would come. IOIA successfully brought together the audience and the NOP brought the training. Deputy NOP Administrator Miles McEvoy and Betsy Rakola, Agricultural Marketing Specialist, USDA-AMS provided the training, which was supported by simultaneous translation to Spanish.

Many participants expressed hope that this would become a regular event.

NEW WEBINARS!

In/Out Balances, Traceability Tests, and Recipe Verification for Processing Inspection under NOP and COR - 200 and 300 level webinars

These webinars will allow inspectors and certifiers to further their understanding of the standards as they pertain to recordkeeping in the processing environment, with an emphasis on methodology, practical application, and standardized reporting. Both webinars will be presented as two, 2 hour sessions several days apart to allow ample time for individual work on exercises. The 200-level webinar include exercises that have designed so that the participant can choose to do them in metric or US standard units.

The 200-level course is designed for persons with at least two years of experience in organic inspection or certification final review experience. Case studies and exercises involve multi-ingredient products. Course participants will preferably have completed an IOIA basic inspection course or are already working as inspectors or reviewers. Participants should contact IOA to sign up for this webinar if they have not taken the basic processing inspection course or do not have experience inspecting processing facilities. The 300-level course is designed for experienced organic inspection or certification final review experience. It features case studies of more complex processes including fermentation, exercises with a mix of metric and US Standard units. It will challenge the most seasoned inspector.

Each course will have a pre-course assignment. To receive a certificate, the participant must achieve a minimum combined score on the pre-course assignment, mid-course assignment, and a post-course exam. Pre-course assignments present case studies, some discussion studies and an initial exercise to validate production records against product profiles. The courses have time built in to thoroughly cover all assignments to ensure learning and opportunity for discussion.

Dates:

Sept 10 and 17, 2014: 200-level Processing Audit webinar

Oct 23 and 30, 2014 300-level Processing Audit webinar

Oct 22 and 29, 2014: 200-level Crop Audit webinar

Coming in early 2015! 200-level Livestock Audit webinar

Spanish language summaries of select newsletter articles are now online in the Newsletter section of the IOIA website, or click here.

Resúmenes en español de selectos artículos de boletines están disponibles en línea en la sección Boletín de la página web IOIA o haga clic aquí.

First IOIA Training of 2014 Starts with a Snowstorm

By Lisa Pierce

In reviewing the acceptance letter for the IOIA crop training: I crossed out the word 'snow' in the 'be prepared for rain and snow' sentence. After all, it would be almost March and although the rest of Canada would still be locked in winter, here on the west coast of British Columbia, we would be eating local winter salad greens, smelling daffodils and counting the emerging shoots of garlic we planted in the fall.... Not!

The IOIA/COG Organic Crop Inspector Training held in Nanaimo, BC (February 24-28, 2014)

began with a usual snow storm. The snow blanketed the fields and resulted in the limited number of snow plows here on Vancouver Island working overtime, the early closure of copy centres and restaurants overrun or not open due to a lack of staff.

The storm increased the travel time for locals and squashed the hopes of participants from out of province hoping to escape the snow and the record cold temperatures experienced across our country this year. But, true to registration, 12 participants showed up at the training site on day 1, eager to begin. By day 4 of the crop course, the sun was shining.

Despite the snow on the fields of our field trip farm, there was still lots of activity and things to learn from Lorne and Barbara Ebell who have been producing salad greens for over 20 years. At Nanoose Edibles, greens are continuously cropped all year. We observed kale plants still standing in the snow covered fields, micro-greens in the propagation house and salad greens that had recently been cut in the polyhouse. (It was also the first mock inspection that you could hear the sea lions barking in the distance-the pacific herring run on the west coast was in process...)



The residual grumpiness I still had about the snow and the influx of too many new inspectors in western Canada quickly dissipated after meeting the participants at the Nanaimo crop inspector training. What an inspiring group of new inspectors and a transformative experience for me! I look forward with new appreciation to the vitality and change that is coming and I welcome our new members of the organic inspector community.

Special thanks to Ashley and the Canadian Organic Growers (COG) for co-sponsoring the IOIA/COG Organic Crop Inspector Training and providing exceptional coordination assistance and support.



Now What? Mentorship and the days leading up to the training...

The Certified Organic Associations of British Columbia (COABC) is the only organization that requires organic inspectors to be members of IOIA. COABC held their annual general meeting and conference in Nanaimo this year just before the 4.5 day IOIA/COG crop inspector course. The upcoming IOIA training became part of the conference discussion at the inspector and certifier roundtable. A total of 12 persons were signed up for the IOIA course - 75% of the participants were from BC. How are we going to apprentice all these new inspectors and who is going to do this? Everyone agreed that the onus for mentoring should not be the sole responsibility of inspectors or a 'free' service offered by experienced inspectors. One of the exciting outcomes of the meeting was that the president of one of the certifying bodies (and COABC representative) volunteered to put together a proposal to COABC for mentoring future inspectors. Upon my invitation, IOIA has forwarded background document on apprenticeship and 1998 OCC\IOIA Organic Inspector Apprenticeship Program proposal to COABC representative. I will write a future article on our progress.

IOIA Visits OMRI

By Amy Bradsher

Here at OMRI, we specialize in a deeper understanding of inputs and materials review. However, some of our staff has limited experience with organic certification as a whole. For those of us looking to understand the bigger picture of organic certification, our two-day April training with IOIA trainer Garry Lean in Eugene, OR was a real treat. Garry customized the training for OMRI staff to include the broader role of the inspector in crop, livestock and processing inspections. We looked at labeling issues, the process for certification and inspection, and those “other” parts of 7CFR Part 205 that we don’t normally look at every day.

We started off with an introduction to the role of the inspector and an in-depth look at the standards for organic livestock. That night for homework each attendee reviewed an OSP and prepared an inspection plan. Then we even went on a virtual mock inspection for a real taste of the process. The experience was extremely valuable in teaching us about the broad range of issues that inspectors are reviewing during the on-site inspection. We also learned a lot about the multiple ways materials review plays a part in the bigger picture.

IOIA training was a great way for OMRI to build our base of knowledge and explore the context for materials review during the inspection and certification process. We all walked away with some significant lessons that will help us with our work. Going into the future, a stronger background in certification can help OMRI provide a greater service to the organic community.



Processing in Utah

By Ronald Larsen

Seed, Fertilizer and Organic Program Manager, State of Utah

After the week of having the highest pollen count for cottonwood trees in the nation, it was time for the organic program at UDAF to settle in for an extensive, co-sponsored IOIA training for processing at the Utah Department of Agriculture and Food in Salt Lake City, April 7-11, 2014.

This IOIA training was the third co-sponsored with UDAF in the past several years and we were very excited to have renown IOIA trainer, farmer and teacher Garry Lean provide our organic staff with refreshed processing training for some, new scope training for others and a what the heck did I get myself into for a few inspectors very new to our program.

After the opening introductions and an overview of IOIA by Mr. Lean the training began with the role of the inspector. All that have taken an IOIA course know what the content is but it was very nice to see all of the participants working together on the content and instruction involved during the week. Everyone was eager to learn and mostly fearful of the test and mock field inspection that always occurs before the Friday test. Role playing simulating different inspection situations is always a favorite of mine and you know what, I have heard of many of those situations in the course of real inspecting. Calculating percentages of organic material as well as audit trails and mass balances is always very productive and useful. Garry has this way of explaining something and turning into a farmer for a bit to give you some perspective and I find that creates a nice way to learn.

We were lucky with the location of our field trip inspection, it was less than 5 miles from the training site which meant less travel time and more after inspection de-briefing and extra time for report writing. Food for Health International hosted our gathering of 11 participants plus trainer and we began with the inspection. Food for Health produces dietary supplements and meal replacements type products and it was very interesting to see the coming and going details of the various products as well as production and packaging. Food for Health is a growing company and had added a new warehouse which was triple the size of the previous one. Our group photo was taken in their parking lot following the inspection. The snowcapped mountains in the background are called the Oquirrh’s. We feel very fortunate to have had Garry as our processing trainer and I wish to thank him for sharing his experience with my staff.



Organic Inspection - A Story of Competence and Professionalism - Part I

by Bob Howe

In 2013, IOIA-Accredited Inspector Member Bob Howe took the initiative to conduct an informal survey of IOIA inspectors on what defines a competent, professional organic inspector. He compiled the results into a PowerPoint presentation and wrote this insightful article.

Both the PowerPoint summary of responses and the full article are available in the "Inspectors only" section of the IOIA website under Business Resources. Part 2 will be published in our next issue.

We are individuals and our perceptions are our own. There is no simple description or definition that will begin to satisfy each of us and each of us has to develop our own sense of self worth when it comes to becoming a competent, professional organic inspector. The varied responses to the survey questions are evidence of this enigma and proof that the perfect is elusive. My hope is that in presenting this broad and complex subject in the way that follows the readers will gain insights into their own understanding of Competence and Professionalism as it relates to their personal sense of values and level of comfort and the effect that our combined strength as competent, professionals can have in the organic "community".

A less than desirable level of these components, competence and professionalism, or a lack thereof seems to be an underlying concern for most organic inspectors. We need only to consider the conversations we have with one another and observe how we generally go about our craft to come to such a conclusion. The responses are clear, a professional must be competent.

Do we not desire and deserve a respect greater than we presently experience? Do we not place a value on our own sense of self worth partly due to the respect that we are given for our work as organic inspectors? The fact that there is, among us, a general belief that some form of accreditation or recognition is necessary is proof of our knowledge of this fact. We want this respect in order, also, to strengthen the integrity of the organic label and to provide us with the status of a unique and professional group. As members of IOIA we have a like-minded union of implied professionals. Consideration as true professionals is something that must be earned. The more we, as individuals, can take our own skills to that respectable level of professionalism the more the union becomes respected and thought of as an association union of true professionals. IOIA gives us the tools and teaches us the basics for entry into our craft and provides us with a network of like-minded workers. However, in the training and through most of the networking, professionalism is merely implied, not specifically emphasized. The tools we are given lead us to competence and the survey responses are clear, one cannot be truly professional if not first competent.

The survey conducted this past summer and the compilation of responses from those who took an interest revealed to me that these are extremely personal concepts and there is no simple guideline or explanation of either. Thesaurus and New World Dictionary do not begin to do them justice. In order to demonstrate the complex and personal nature of the concepts you will find a Power Point summary of all of the responses for each of the ten questions. I make no effort to clarify or explain the responses

because they speak for themselves. It is clear that the questions made the respondents think, quite deeply, I believe, before forming a response. The fact that the surveys were compiled anonymously and were not reviewed with any reference to the author in any case gives credence to the responses as honest and heartfelt. I took the survey several times, myself, before beginning to review or compile any of the surveys submitted, and my responses were usually somewhat changed from those of my earlier ones, or refined. I suspect that if the respondents would take the survey again, without reference to their initial responses, they would find the entries as I did, somewhat different. I think that is evidence of just how broad is concept and how elusive its nature. It is not feasible for me to take the survey again because I have compiled and studied the responses and they have had an influence on my points of view. On the strength of that I recommend that each of you open the PowerPoint presentation and do as I did, review and study the responses. They are very revealing.

Now I would like to just tell you about some observations made in my 13 years as an organic inspector, and some experiences that speak to Competence and Professionalism. As a lead in to that, let us agree that our primary objective is the integrity of the organic label, consumer confidence that the label is genuine and the realization that organic is the environmentally friendly means for agriculture and processed products. And, of course, how we value our own self worth.

I recall an inspection at a very well run facility when a third party inspector (not an organic inspector) showed up for an unannounced. This inspector strutted in, interrupted and did a rather arrogant and cursory introduction and finished with "you will not get a perfect mark, I will find something

to make sure that does not happen”, more or less in those words. I was nearly finished and I completed my Exit Interview and left. I later sent an email to the client thanking them for their participation, to which I received a reply; “we almost got the 100%, and would have except for one minor issue. We have card access control for security and all personnel doors and entrances to the facility and handling areas are controlled. There is one emergency exit, with a panic bar and alarm on the inside and no lever on the outside so the door cannot be opened from the outside, but the door was not equipped with card access device and the inspector took 5 points off. The inspector implied that if there was any other issue found the door would not have been noted.”

At one of the IOIA AGM’s I happened to overhear a conversation between two inspectors and one of them said, “I set the stage when I arrive and I let the clients know that I am there to find out what they are doing wrong, just so they don’t get the idea that the inspection is a slam dunk” or words of that nature. Not much different than that other third party inspector. Personally, I think this attitude is not professional at all and speaks to arrogance.

Establishing a rapport with the client is obvious to me and I believe it is so with most of us. The client perceives our spoken word or manner at the beginning and during the inspection as either courteous and interested and knowledgeable or bordering on rude or superior. Whether they are forthcoming or not depends in a large part on the trust that can be established. Throughout the responses to the survey there is a theme that addresses our interactions with the clients and the certifiers and what we sense them to be and what we believe that they should be.

Some time ago I began to develop a flow diagram for the process of

inspecting. The diagram started with the receipt of an assignment from a certifier and I realized right at that point that some decisions had to be made before I accepted the assignment. Such as: Do I have experience for this type? Is there travel involved and can it be coupled with one or more inspections for the trip? What is the urgency and can I fit it in? Do I have any other reason to deny the inspection, respect/trust for the certifier? etc., you fill in the blanks. The next step is just as involved and it becomes more involved until the date is confirmed, followed by the arrangements for travel, preparation for the inspection (a lot in this one). And so forth until the report has been submitted and the certification decision is made. This exercise was useful and helped me get a handle on and more control of my business as an independent organic inspector. That being done, I had a foundation for myself as a competent inspector and a realization that there was a long way for me to go before the label of competent and professional could become realistic. Doubt still rests in my mind because there are oversights and misconceptions that creep in on occasion, reports that could be improved, training that should be undertaken. All of us live with this same conundrum, and if we don’t we should probably hang up our laptops.

We, as inspectors, receive critical feedback from the certifiers and off the cuff feedback from the clients we inspect and from our colleagues. There are a number of ways to look at this feedback. How we look at it and how we use it has a lot to do with whether we grow and gain confidence or not. For me, an honest criticism is useful and, when taken at face value, makes my future inspections better. Taking criticism personally and denying the motive of the critic is counterproductive, even when we perceive the criticism to come from a hostile source. It is true that some

criticism is more clearly stated or explained and therefore more useful. My experience is that few certifiers do a creditable job of critique and it becomes the inspector’s job to follow up and/or question the certifier or reviewer. Personally, I take this as a two way street and I do critiques of the certifiers as well, which has helped me form a good relationship with some, helped me with decision to drop contract with some others. A competent professional, I believe, must never feel that there is no more to learn, there is no improvement needed.

We are provided with the previous inspection report when we receive the file for an inspection. My purpose for talking about this is that one of the questions in the survey had to do with what we consider the most common flaw exhibited by the previous inspector. For a long time I did not look at the report for I felt that it might set up a bias and prove unfair for the client. At an inspection during this time, a client placed a copy of their last report in front of me and asked, “What do you think of this?” I told them that I had not read it and told them why. They were clearly upset about the report and I had no choice but to look through it. I then proceeded with the inspection and told the client that I reserved judgment until I had an opportunity to see for myself. What I observed was not as the report said and most of the concerns and issues noted in that report did not reflect the current situation. The OSP had not changed and there were no significant changes in the plan or the operation, the personnel involved were the same as were present at the previous inspection.

My reason for telling you about this experience is not to convince you to review previous reports but to demonstrate the impact on the client/certifier/inspector relationship when we don’t do a good job. ☹️

Improving the Exit Interview

By Margaret Scoles

“Improving the Exit Interview” training was delivered on February 21, in San Diego at the annual Accredited Certifiers Association (ACA) training and at the IOIA advanced organic inspector training in Costa Rica on March 21.

Background: The training module was born during the ACA’s *Sound and Sensible* working group in the summer of 2013. The larger working group broke into several subgroups. I chaired one of those - the Inspection subgroup – with Ib Hagsten. The other participants were all from certification agencies, plus Pat Kane, Coordinator of ACA. Subgroups sought to identify topics and concepts where the community would benefit from more training and areas where NOP guidance or regulation would be helpful. One of the topics where we all agreed training would be beneficial was the **exit interview** (both the process and the document). An ad hoc committee, a more balanced mix of inspectors and certifiers, worked early this year to help design and shape the training. We recognized the Exit Interview (EI) as a critical part of the inspection. We thought that the EI could be done better, and we didn’t think we needed further instruction from regulatory bodies about how to do it.

Oddly, as inspection reporting forms have become increasingly longer and more structured over time, the exit interview documents used by different certifiers are widely variable and usually highly unstructured. They are often free-form, leaving it up to the inspector to decide how to use the white space. Our group thought training could potentially improve both the EI process and the EI document. Since many certifiers are not accompanying inspectors to do field evalu-

ation of inspectors, certifiers found the topic interesting even though the EI is almost exclusively the realm of the inspector. Perhaps the certifiers’ interest was heightened by the recent NOP Certifier Instruction regarding field evaluations.

We looked to the NOP rule - 205.403(d), but went beyond that to look at good ISO-based audit technique. That’s when we realized we needed to back up and add training on the Opening Meeting too. The success of the EI is largely based on preparing the operator so they know what to expect. We agreed that it is critical for inspectors to set aside a specific amount of time to go through notes and make sure all identified issues of concern and areas where further information are needed AFTER the inspection is concluded and BEFORE the exit interview. Certifiers in the group voiced zero tolerance for inspection reports and EI documents that don’t jive. They do not want to find issues of concern buried in the report and not on the EI document. One contributing certifier in the group reported that they mandate inspection reports be completed on-site and that a minimum of 30 minutes be spent alone before launching the exit interview. After doing this, discrepancies between the report and EI virtually vanished. While 30 minutes was on the long side, we concluded that inspectors generally shortchanged the time they used to collect their thoughts.

Outcomes of the training: A Power-Point presentation (easily adaptable to webinar delivery), Draft Procedure for Opening Meeting, Draft Procedure for Exit Interview, Draft Exit Interview Document, and scenarios for role playing some difficult exit interviews were developed. In San Diego, I played the “inspector” with Sarah Townsend (ICS), Georgana Webster (MTDA), and Sean Feder (CCOF) as the recalcitrant operators. Lois Christie, Leonard

Pollara, and Luis Brenes helped out in the same roles in Costa Rica. All of the materials were provided to ACA members. One outcome we expected that didn’t happen was a brilliant EI document. The form we ended up with was a hybrid - not all white space but fairly open. We decided the EI form should be as uncomplicated as possible. We found that the highly structured forms often leave the inspector with less room to work with and tend to run into multiple pages, making signatures more difficult. Unfortunately, the form ends up dictating the process instead of the other way around. We decided - leave the white space open, and train the inspectors how to write issues clearly, completely, and concisely. We liked duplicate forms. We ended up liking forms that didn’t duplicate anything from the report other than the issues of concern and further information needed. We liked one sample document that makes the EI document a Sample Collection receipt. That saves a piece of paper and simplifies the process.

We looked at NOP Audit Checklists, ISO Guides for quality auditing, and the American Society for Quality (ASQ) Handbook for ideas for best audit practices. Best practices for opening meeting and closing meeting were remarkably consistent everywhere. Interestingly, all of these guides required commendations. No, the regulation doesn’t require commendations, but all good audit techniques and guides put them very first, at the beginning of the EI process. However, most certifiers did not want to see commendations on the written EI document. We suggested - do them orally, but do not write them on the form. They help set the stage for good communications during the review. Also, the operator should be encouraged to ask questions.

Citations or not? No certifiers disliked having citations on the EI document. Some don’t require it because the EI

document refers to specific sections of the OSP and the citations appear there. However, the consensus was that citations are never a bad thing. The certifier doesn't mind if the citation is a different one than what they will end up citing in the NONC, and it is good to be as specific as possible. So, cite not 205.103, but 205.103(b) (2), if that is the one that applies best. Introducing the regulation removes the sting and de-personalizes the identification of the issue.

Attestations: The operator and inspector must be clear that the purpose of the signature is not that the operator agrees with everything on the EI document. We avoided any language that implied that the operator agrees with everything

on the EI document. The purpose of the document is to show that the inspector debriefed the findings, not that the operator and inspector are in complete agreement. With a little help from legal counsel, we came up with language that worked for everyone.

Auditing Handbook, 3rd ed © ASQ; NOP Accreditation Audit and Witness Audit Checklists, EPA Field Inspectors Manual; IOIA training materials.

Acknowledgements: Thank you to the many inspectors and certification agency staff who worked on this project. I hesitate to name any, not because it would take space, but because someone might be unintentionally omitted. Special thanks to ACA, without whom this training may never have happened. One of the best outcomes for me personally was the awareness of how effective ad hoc committees of inspectors and certifiers can be! And of how willing people are to work when the task is well-defined and comes with an end-point.

The Purpose of the Exit Interview

7 CFR 205.403 (d) Exit interview. The inspector must conduct an exit interview with an authorized representative of the operation who is knowledgeable about the inspected operation to confirm the accuracy and completeness of inspection observations and information gathered during the on-site inspection. The inspector must also address the need for any additional information as well as any issues of concern.

Signatures:

A few certifiers allow the EI to be completed orally and either have no signature or just a signature that says the EI was completed. Although regulation might not require signature, our group felt they were essential and more legally binding. Unless forms are provided in duplicate and filled out manually, getting signatures can be complicated. This is especially true in some of the new on-line certification systems.

Consulting? Certifiers were fine with inspectors reporting the operator's proposed plan of action once a potential non-compliance has been identified, but they cautioned us not to create the illusion that this fixes the problem. Avoid directive language. Beware of taking ownership with statements like, "the grower will send in ..." or "the operator realizes there is a problem and will do _____".

Full sentences?

Not necessary. But the issue needs to be written with enough detail that is crystal clear what the issue is. The certifiers did not like whole paragraphs cut and pasted into the EI document right out of the report.

The Future: IOIA is updating our Exit Interview training materials. I personally will be implementing some good new best practices (better preparing the operator during the opening meeting, committing to at least 15 minutes of alone time to go through my notes before starting the exit interview, NOT telling the operator "we need to agree on everything that goes on this document"). If there is interest, this training could be offered as a webinar.

References: ISO 19011 Guidelines for quality and/or environmental management systems auditing, The ASQ

Fumbling, from page 21

Presenting this mixed picture in an inspection report or exit interview is reasonably straightforward: mention the evidence of good soil quality; outline the two potential noncompliances; and describe the other less conclusive situations as objectively as possible, casting them as opportunities. Certification (noncompliance) letters issued by most certifiers include things like "recommendations", "reminders", "advisories", and "opportunities" to communicate concerns and information on issues that may not rise to the level of a noncompliance, but still require some kind of guidance or directive to nudge the operator in the right direction. To my thinking, this seems like an appropriate response to the situations that appear in the bottom row of the matrix: by reminding the operator about the broader responsibilities towards the natural resources of the operation enumerated in the NOP rule, the inspector and certifier can help increase awareness of the opportunities and perhaps make him a more engaged participant instead of a bystander.

Fumbling Towards Complexity, Part V: The Matrix

by Tony Fleming

(Ed. note—this is part of an occasional series examining the role of natural resources in the certification process, and exploring some of the practical and institutional challenges that hinder inspectors’ ability to assess and interpret biodiversity management on NOP-certified farms. Previous installments appeared in the Winter 2011, Spring 2011, Spring 2012, and Summer 2012 editions of the Inspectors Report.)

Earlier installments in this series highlighted a variety of challenges inspectors face when assessing the management of natural resources, illustrated by two real-world inspection experiences that exemplify the dichotomy that currently exists among certified farms. Obstacles to bringing more consistency to the inspection process viz natural resources tend to fall into three overlapping categories: 1) cultural setting; 2) institutional structure; and 3) practical application. Cultural setting greatly influences operator attitudes toward biodiversity and the degree to which the operator is an active participant in managing natural resources. Institutional structure, on the other hand, determines the framework within which the inspection process occurs. For example, the longstanding lack of clarity in the NOP rule concerning what actually constitutes compliance (or not) regarding “maintaining or improving the natural resources of the operation” has resulted in a wide disparity in the way biodiversity is handled in the

certification process—manifested by wildly divergent organic system plans, with the majority sorely lacking in this realm, or exclusively focused on soil quality to the detriment of other aspects of biodiversity. Finally, practical application represents the ability of the inspector to assess the natural resources of the operation in a consistent and even-handed fashion, despite the fact the resources themselves are often complex, transient, and site or region specific, and when the task is hampered by a variety of institutional and cultural factors beyond the inspector’s control.

Given these challenges, it can sometimes seem overwhelming to keep track of practices, indicators, and their implications for natural resources during a brief farm inspection, when the inspector has many other topics to occupy his or her attention. This is especially problematic in situations where the OSP provides little or no information—the OSP may lack specificity regarding natural resources and related practices (or the operator didn’t provide much of an answer), but that doesn’t mean natural resources aren’t present or that the operator isn’t engaged in practices that affect those resources. Hence, a means of organizing one’s observations to provide a basic snapshot of the natural resources of the operation in the context of the NOP rule can be invaluable.

One way to do this is via a simple matrix, with natural resources on one axis and a basic NOP-based rating system on the other. The cells of the matrix are then populated with relevant inspection

observations. The example below illustrates the components of the matrix and shows how this might work for the two farms described earlier in this series—Lake Michigan Farm and Barren County Farm—which occupy opposite ends of the biodiversity spectrum.

First, let’s look at the basic elements that make up the matrix. In this example, the “natural resources of the operation” that comprise the horizontal axis are separated into the respective components enumerated in the NOP Definition: soil, water, woodlands, wetlands, wildlife. This may be easier said than done, at least on a functional level, because everything is interdependent (also known as the “no free lunch” principle: in a complex system, everything is connected to everything else). Nevertheless, for organizational purposes, thinking about each component as a separate management entity can help bring clarity to the overall assessment. Note that we’ve added a sixth natural resource category to the matrix, which I call “other uncultivated areas”. This allows us to account for field borders, fencerows, and similar places that don’t fit neatly into the definitions of “woodlands”, “wetlands”, etc., but which often hold great significance for farm biodiversity.

This example is just one of many possible schemes that can be devised for categorizing the natural resources of a farm. For example, we could consolidate “woodlands”, “wetlands”, and perhaps even “other uncultivated areas” into a single “natural areas” category, which might

be entirely appropriate for vast swaths of the agricultural Midwest that lack the variety of natural features in this example. Likewise, categories can easily be adapted to regional biomes: “tall-grass prairie” or “desert-steppe” would be appropriate choices for parts of the high plains and western states, respectively. Beyond including the universally applicable categories of “soil quality”, “water quality”, and “wildlife”, the system is infinitely adaptable.

Implicit in the act of organizing one’s observations is the element of interpretation. Inspectors are familiar with this concept: we gather observations, organize them into some sort of framework, and then interpret them in the context of the NOP rule. The same idea applies to evaluating the quality and management of natural resources. A simple, three-tiered rating system that ranks observed practices according to the wording in the rule makes up the vertical axis: non compliant, maintains the natural resource, and improves the natural resource; along with a fourth category, “uncertain, incomplete, or not observable”. Combining this basic rating system with the different categories of natural resources yields a simple decision matrix that can be helpful for interpreting compliance with the rule.

In practice, determining whether an operation or one of its practices “maintains” vs. “improves” a natural resource can be subjective—the fluid aspect of those resources, combined with the difficulty of establishing a “bright white line” in the regulation, require a more nuanced

approach than, say, verifying the combine was adequately cleaned out or that organic seed was used—but the distinction is often useful for judging operator initiative. The “uncertain-incomplete-not observable” category is a catch-all for equivocal or inconclusive situations, such as: when the impact of an operator’s practices (pro or con) is unclear or requires more information or a longer period of time to assess effectiveness; practices are missing or incomplete (i.e., an opportunity exists but is not being acted on); or the resource in question is not observable for some reason at the time of the inspection.

Note that many of the entries in my example matrices follow the “positive compliance indicator” concept outlined by Wild Farm Alliance in their excellent biodiversity guides for inspectors and certifiers. Becoming familiar with the contents of these guides is, in my opinion, one of the best ways to take much of the guesswork out of interpreting whether the operator is “maintaining” or “improving” (or degrading) the natural resources of the operation. The list of positive compliance approaches enumerated in the WFA guides is wide ranging and readily applicable to virtually any bioregion.

Please see the Matrix on page 23

Now let’s look at the contents of the matrix, which are simplified from the observations made at the two farms described earlier in this series. Not surprisingly, the matrix for “Lake Michigan Farm” is well populated with positive

compliance indicators that reflect the operator’s proactive attitude towards biodiversity. Here, we might note that the completed matrix could be turned in as an addendum to the inspection report: whether that is useful will depend on how effectively the structure and contents of the OSP already communicate the natural resources of the operation. Nevertheless, the matrix confirms what our intuition suggested during the inspection, but it also visually demonstrates how we might quantify our observations, which will be useful at inspections where things aren’t so clear cut, like the next example.

How would you rate the overall performance of “Barren County Farm”? Arranging the practices and observations in the matrix provides a snapshot that helps bring whole-farm biodiversity into focus. I give the operator credit for maintaining or improving soil quality, and a minor amount of credit for at least thinking about reseeding the creek banks. Maintaining a bird feeder is a nice gesture but basically pretty trivial in the big picture: to attract birds, there has to be habitat. Two potential noncompliances and several incompletes (opportunities) round out the natural resources “report card”. Seen this way, the conservation practices at Barren County farm don’t add up to a very holistic program. At best, the operation could be seen as “maintaining” some of its natural resources, but the producer clearly has not, to paraphrase the NOP, “initiated practices to support biodiversity, nor avoided, to the extent practicable, any activities that would diminish it”.

see Fumbling, page 19

Board of Directors – Minutes Highlights

Note: Full Minutes are posted in the Inspectors Section of the IOIA Website.

Jan. 23, 2014 Conference Call

Board Members Present: Ib Hagsten (IH), Pam Sullivan (PS), Margaret Weigelt (MW), Garth Kahl (GK). **Stuart McMillan (SM)** and Isidor Yu (IY) joined at 7:15 PM EST. **Not present:** Bill Stoneman. **Also present:** Margaret Scoles, ED (MS)

Approve Agenda Jan 23:

MS suggested we add 2 items to agenda, a request for 90-day extension of the comment period related to the Draft Environmental Impact Statement (EIS) for Dow AgroScience’s Enlist 2,4-D tolerant soybean and corn, and the 2015 IOIA AGM Location. Added, **Approved** unanimously.

Report from Vice Chair, Stuart

McMillan: A meeting (approx. 2-hr) is scheduled for 10 AM Feb 3 to initialize dialogue between IOIA and the Canadian Organic Office (COO)/Canadian Food Inspection Agency (CFIA). SM invited BOD members to make suggestions now or by email. IH suggested *biodiversity* and *what is consulting during inspection*. MS made suggestions on how best to *present our inspector accreditation concepts*.

Treasurer’s Report, Pam Sullivan:

Highlighted final revisions to proposed Preliminary 2014 Budget. Total income, \$630,550, which is about \$111K more than 2013. Total Expense projected to be 25% more than 2013 at \$627,050. GK made motion to accept the “wonderful” budget. SM seconded. **Decision:** Motion passed unanimously. Profit and Loss/IOIA Budget vs. Actual 2013 shows a \$15,000+ profit. GK suggested and **consensus** reached to postpone accepting the “Profit and Loss/2013 IOIA Budget vs. Actual” document until next meeting.

ACA Field Evaluation of Inspectors

White Paper Draft 7: “Instruction Personnel Performance Evaluation, NOP 2027, Aug 2, 2013” was also referenced. MS explained the IOIA perspective is included in the paper. The paper supports the idea of having IOIA develop the IOIA Inspector

Balance Sheet (Cash Basis) As of December 31, 2013

| | Dec 31, 13 | Dec 31, 12 |
|---------------------------------------|-------------------|-------------------|
| ASSETS | | |
| Current Assets | | |
| Total Checking/Savings | 178,138.03 | 173,381.27 |
| Accounts Receivable | -5913.63 | -1,406.17 |
| Total Other Current Assets | 25,832.68 | 12,319.98 |
| Total Current Assets | 198,057.08 | 184,295.08 |
| Fixed Assets | | |
| Total Building | 38,768.86 | 35,908.86 |
| Other Assets | | |
| Accumulated Depreciation | -7,245.69 | -5,875.41 |
| TOTAL ASSETS | 229,580.25 | 214,328.53 |
| LIABILITIES & EQUITY | | |
| Liabilities | | |
| Health Reimbursement Arrangement | 0.00 | -100.00 |
| Total Liabilities | 0.00 | -100.00 |
| Equity | | |
| Contributed Property-FMValue | 29,031.80 | 29,031.80 |
| Restricted (Scholarship Travel Fund) | 328.87 | 656.00 |
| Retained Funds | 184,740.73 | 173,421.59 |
| Net Income | 15,478.85 | 11,319.14 |
| Total Equity | 229,580.25 | 214,428.53 |
| TOTAL LIABILITIES & EQUITY | 229,580.25 | 214,328.53 |

Accreditation Program as a third party option for inspector field evaluation.

DRAFT 2,4-D Corn, Soy EIS Extension

Request letter (NPSAS): Decision: that MS draft a letter on IOIA letterhead to basically say the same thing as the NPSAS letter. SM seconded. Motion passed unanimously.

2015 AGM Location: MS presented information about Bethany Center in Florida and Montana and reservation deposits. Information and discussion centered around the need to put down deposits, other potential locations. MW suggested we create a protocol to decide AGM locations 2 years ahead. SM said he was willing to survey and collect response data from our membership about their preferred location for the 2015 AGM. **Consensus** reached to have 3 locations--Florida, New Orleans and Montana--on the survey.

Verbal ED Report, Margaret Scoles:

A CPA has been hired as PT bookkeeper. Expo West fundraising event planned. ACA meeting is the Feb 20-21. MS will do an Exit Interview Training and attend the ACA NOP training on Feb 19. MS will create marketing package with Primus-Labs for Food Safety Initiative to give to certifiers.

Respectfully submitted, Margaret Anne Weigelt, Secretary

OFRF Announces New ED

Congratulations to Brice Tencer, who has been selected as the new Executive Director of the Organic Farming Research Foundation.

Lake Michigan Farm (see the Spring, 2012 Inspectors Report)

| -----Natural Resources ----- | | | | | | |
|-------------------------------------|---|--|--------------------------------------|------------------------------|--|---|
| Rank | Soil Quality | Water Quality | Woodlands | Wetlands | Wildlife/Birds/Insects | Other Uncultivated |
| Improves the resource | Long crop rotation w. deep rooted legumes Free ranging poultry | Restored wetlands retain field runoff, filter out nutrients and sediment, enhance ground water recharge, etc | | Historical wetlands restored | New wetland habitats; Native field borders provide cover and corridors; Garden beds provide nectar, habitat, food | Invasive plants removed from field borders |
| Maintains the resource | Natural soil forming processes in all uncultivated areas; | Woodland filters surface water and maintains ground water recharge (amphibians present) | Sustainable uses of old-age woodland | | Woodland habitat/roosting areas preserved | Native plants preserved/re-established in field borders |
| Non Compliant | | | | | | |
| Uncertain/not observable/incomplete | | | | | Wetlands provide stop-over sites for migratory waterfowl (not observable in mid summer) | |

Barren County Farm (see the Spring and Summer, 2012 Inspectors Reports)

| -----Natural Resources ----- | | | | | | |
|-------------------------------------|--|---|--|---|---|--|
| Rank | Soil Quality | Water Quality | Woodlands | Wetlands | Wildlife/Birds/Insects | Other Uncultivated |
| Improves the resource | Crop rotation; | | | | | |
| Maintains the resource | Organic poultry litter applied at agronomically reasonable rates | Some attempt made to reseed creek banks following ditching, but... | | | | |
| Non Compliant | | Poultry litter left on soil surface over winter while soil was frozen | Conversion of woodland to dirt bike course: incompatible with wildlife stewardship | | Bird feeder | |
| Uncertain/not observable/incomplete | | Reseeding efforts on ditch banks lacked followup and made no attempt to pursue cost sharing or technical assistance | | None present, potential opportunity exists to restore one or more flood-prone depressions into wetlands | Missed opportunities to turn buffer zones and riparian corridor into better habitat | Buffer zones heavily infested by invasive, non-native shrubs |

Simple decision matrices for two farms, ranking observed conservation practices according to their impacts on different natural resources



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Keep IOIA Strong - Lend Your Strength And Get Involved!

2014 Calendar

June 2-20 Burlington, VT. Breakthrough Leaders Certificate in Sustainable Food Systems. A combined online and on-campus cross-disciplinary program addressing problems and opportunities relating to sustainable food systems and leadership. The program's online component June 2-13 will be immediately followed by a residential learning experience on the campus of the Univ of Vermont from June 15-20. <http://learn.uvm.edu/programs/breakthrough-leaders/>

June 4 Jefferson City, MO. Alternative Agriculture Field Day. Keynote speaker is George Kuepper. Topics will include integrated pest management, prairie restoration, solar energy, native plants, and pollinators. <http://bit.ly/QYx8rA>

June 4 - 7 São Paulo, Brazil Biofach America Latina. www.biofach-americalatina.com.br/

June 6 [Webinar on NOP Seed Requirement](#) presented by Organic Seed Alliance. <http://seedalliance.org/events>

June 6-8 Brattleboro, Vermont. Strolling of the Heifers. Other activities include farm tours, a farm breakfast, and the Tour de Heifer bicycle rides. <http://www.strollingoftheheifers.com/>

June 21-24 New Orleans, Louisiana. [Institute of Food Technologists' \(IFT's\) Annual Meeting and Scientific Program](#) <http://www.ift.org/>

June 22 - 25 Grand Rapids, Michigan. NACDEP Conference, celebrating Community and Economic Development Extension. The conference provides a forum for Extension educators, scholars, researchers, partners and government officials to explore the breadth of topics related to community development. <http://tinyurl.com/qceo8lp>

August 3 - 6 Raleigh and Pittsboro, NC. SAEA Conference. Join us next summer for the 6th National Sustainable Agriculture Education Association (SAEA) conference. <http://sustainableaged.org/>

Sep 9 - 10 Nairobi, Kenya. 2014 Africa Food Security Conference & Agri-Exhibition <http://www.aidembs.com/africa-food-security-conference/>

Sep 18-20 Baltimore, MD. Expo East. www.expoeast.com

Oct 08 - 09 Louisville, KY. Crop Insurance and the 2014 Farm Bill Symposium. <http://tinyurl.com/kbn95eg>

Oct 14 - 16 Side, Antalya, Turkey. 9th International Soil Science Congress on "The Soul of Soil and Civilization." <http://soil2014.com/>

October 13 - 17 18th Organic World Congress & IFOAM General Assembly. Istanbul, Turkey. <http://www.owc2014.org/>

Oct 28 - 30 Louisville, KY. Fall 2014 NOSB meeting. Galt House Hotel.

March 28, 2015. IOIA Annual General Meeting, Chico Hot Springs, Montana. See page 8 of this issue.

*Please see page 9 for the current list of
IOIA on-site trainings and webinars*