

## Mega-Collaboration in Costa Rica

### IOIA AGM - NOP TRAINING - FOOD SAFETY - FAIR TRADE - AND MORE!

IOIA and PrimusLabs have reached agreement to launch a food safety training initiative. Encouraged by the results of the membership survey (see page 12), the IOIA Board of Directors approved moving forward to develop this program. PrimusLabs and IOIA's have the shared goal to qualify IOIA as a trainer. IOIA offers the first training open to inspectors and certifiers on March 20 as day one of the Advanced Training. The session will provide useful cross-training in Good Agricultural Practices (GAP) and HACCP and additional work opportunities for organic inspectors. PrimusLabs developed a 5-step program to provide access for small farmers below the FSMA limit to access institutional and other markets who typically require food safety verification. The Small Farmer Program is a 5-step program that consists of a) training for producers or processors, b) developing and implementing food safety plans, c) internal self-audits, d) audits by a 2nd or 3rd party regional independent verifier and, e) external 3rd party certificated GAP or HACCP audit. IOIA will work with a group of trainers, who will be qualified to train independent verifiers to fill the gap that currently exists (step 4). **Karen Troxell**, IOIA Inspector Member, IOIA Training Advisory, and partner in The Organic Consulting Firm, will deliver this first open-enrollment 7-hour training on March 20, assisted by **Debra Garrison** and Rebecca Burnworth of PrimusLabs. The training will prepare organic inspectors to do Regional

Independent Verification for food safety. Inspectors will not be limited to working for PrimusLabs; the program is not exclusive. IOIA is inviting certifiers to participate in the program and consider Food Safety verification as an 'add-on' to the organic inspection.

Advanced training will continue on March 21 with timely topics, including a presentation by **David Gould**, former organic inspector and current IFOAM Value Chain Facilitator & North America Representative, who will speak on "**Trends and Statistics in Organic Agriculture**". Annually IFOAM publishes the most current global organic information and presents a book by the same name at BioFach in February. **Winfried Fuchshofen** will speak late afternoon/evening at the end of the advanced training. His presentation "**The Fair Trade Landscape and the Role of the Fair Trade Sustainability Alliance**" will be open to all who are taking the advanced training or who are arriving for the Annual Meeting. Other speakers and advanced agenda topics are under development. Draft agenda, application form, and more details will be updated regularly on the IOIA website as they are confirmed.

On March 18-19, NOP will provide two days of training for certifiers in Spanish language. IOIA is hosting the training and managing logistics, including the preparation of a new informal Spanish-language NOP [See **Costa Rica**, page 4]

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## Notes from the Chair

By Ib Hagsten

Our clocks have changed, fall is seriously in the air, and field inspections are slowing down for obvious reasons, including fewer daylight hours and fall harvest winding down across much of North America. We, at IOIA, sincerely hope that you have had as great and as abundant a 2013 inspection season as you desired to have.

From the survey that 40% of our membership – that means many of you – participated in this August, we learned that not all of you wish to conduct 100 or 200 annual inspections, as some of us do. It was very helpful for us to get a renewed sense (as we conduct the survey only about every five years) of who, why, and how you conduct organic inspections. Thank you very much for your detailed input and deliberated responses.

IOIA had a very successful training season this year, as you might have noticed by the many updates and announcements of (1) basic classroom/field trip sessions across the country; plus (2) 100-level, 200-level, and 300-level webinar trainings that allow us to get up-to-speed in areas of expertise (a) we wish to move into, (b) we may be a little [See **Notes**, page 4]

## Member Updates

Please welcome the following new members in the upcoming online and dead tree editions:

### Inspector Member

Tim Barnaud - [barno9@hotmail.com](mailto:barno9@hotmail.com)

### Supporting Business

New Belgium Brewery -  
[mmiller@newbelgium.com](mailto:mmiller@newbelgium.com)

### Supporting Individuals

Rebecca Brown -

[brown.rebecca0@gmail.com](mailto:brown.rebecca0@gmail.com)

Elizabeth Burchichter -

[elizabeth.burchichter@gmail.com](mailto:elizabeth.burchichter@gmail.com)

Terry Crane - [ltcrane@friendlycity.net](mailto:ltcrane@friendlycity.net)

Eileen Cullen -

[emcullenemc@gmail.com](mailto:emcullenemc@gmail.com)

Jade Johnson -

[jadecjohnson7@gmail.com](mailto:jadecjohnson7@gmail.com)

Billie Jo Kiel -

[billiejo.kiel@whitewave.com](mailto:billiejo.kiel@whitewave.com)

Marjorie Lamb -

[marjorie@springthymeherbs.com](mailto:marjorie@springthymeherbs.com)

## 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](mailto:webgal@ioia.net)

Deadlines: Feb 1, May 1, Aug 1 & Nov 1.

Published quarterly on recycled paper.

## Membership Dues Deadline Dec 10 – Don't Let Your Membership Expire!

As a Member of IOIA, you're part of a team that maintains the integrity of organic producers and processors as they serve the expanding marketplace for certified organic goods and services. You make sure that "organic" really means organic. We're sure you'll agree that your work is more important now than ever.

We've mailed you asking you to renew your dues and update your Membership Directory entry. If you already paid, thank you! If you've missed making your dues payment, please give us a call or drop us an email message right away. Renewing and updating can all be done on-line. Let us know by January 1, if you'd like to subscribe through IOIA's group rate of US\$15 to *The Organic Standard* (inspectors only) or US\$25 for hard copy subscription to *The Inspector's Report* (all members). And check your on-line member directory at <http://www.organicweb.org/ioia/>.

The hard copy of the Membership Directory will be printed in January. If you wish to receive a hard copy of the Membership Directory, please reserve your copy now. IOIA will continue to print the mini-directory as an insert to the first issue of the 2014 newsletter and will make it available on-line for all members.

**Please honor the work that you've done, the purpose we serve, and the future we share. Please renew today!**

## End of an Era

Attention Reader: You are holding a **Collector's Edition** – the last hard copy printing of *The Inspectors' Report* that was mailed to all members and newsletter subscribers. For 2014, you must subscribe to the hard copy newsletter if you wish to continue to receive hard copies. Based on positive member responses in the 2013 Inspector Membership Survey, the IOIA Board of Directors decided to go digital, with the option for a hard copy for an additional charge. The considerable savings allows IOIA to maintain most categories of membership dues at the same level as last year. Starting now, if you wish to receive a hard copy mailing, the fee is \$25 for members and \$30 for non-members. All members will continue to receive the newsletter by e-mail.

## Driscoll's - Job Opening

Driscoll's is looking for an Organic Program Specialist. This person reports to the Organic Program Manager and performs a wide range of technical and administrative duties to ensure Driscoll's organic system plan is updated and maintained as required by the USDA National Organic Program. The specialist will also provide administrative support, and ensure timely communication of NOP program changes to growers in order to maintain compliance. The specialist will be required to work on a wide range of projects that will not only meet current needs but allow for future growth of this role. The individual will represent Driscoll's in the field to all organic berry producers in the US, Mexico and Chile. Travel required up to 10% - 15% of the work time. Based in Watsonville, CA. Full details at <http://www.driscolls.com/about/careers#careersjump>

## On-Site Training Schedule

### Utuaado, Puerto Rico - Farm Inspection Course, December 2-6

IOIA and Eco-LOGICA will cosponsor a 4.5 day Spanish-language Basic Organic Farm Inspection training to the USDA NOP at the University of Puerto Rico.

### Hong Kong, China - Crop and Processing Inspection Courses, January 11-21

IOIA and Hong Kong Organic Resource Centre (HKORC) will cosponsor a Basic Organic Crop Inspection Course January 11-15 and Basic Organic Processing Inspection Course January 17-21 using the HKORC-Cert Organic Standards as a reference. The courses will be held at Hong Kong Baptist University, Kowloon Tong, Hong Kong, China. Application forms and more information about the course are available at the website of HKORC at [www.hkbu.edu.hk](http://www.hkbu.edu.hk).

### Guelph, Ontario, Advanced Inspector Training, January 31

IOIA will provide one-day of advanced organic inspector training in Guelph, Ontario on January 31 in conjunction with the Guelph Organic Conference. For more information about this training see page 5.

### Toronto, Ontario – Processing Inspection Course, February 3-7

Canadian Organic Growers and IOIA will cosponsor Basic Organic Processing Inspection Training. The course includes comprehensive training on the Canadian Organic Standards and four days of instruction including a field trip to a certified organic operation, plus one-half day for testing. This training is geared primarily for inspectors, but others such as certification agency staff, regulators, industry consultants, and educators are also welcome. For more information about this training and to receive an application contact Ashley St. Hilaire of COG. E-mail: [ashley@cog.ca](mailto:ashley@cog.ca) Phone: 613-216-0741 or 1-888-375-7383 Fax: 613-236-0743 website: [www.cog.ca/news\\_events/inspector/](http://www.cog.ca/news_events/inspector/)

### Nanaimo, British Columbia – Crop Inspection Course, February 24-28

Canadian Organic Growers and IOIA will cosponsor Basic Organic Crop Inspection Training. The course includes comprehensive training on the Canadian Organic Standards and four days of instruction including a field trip to a certified organic operation, plus one-half day for testing. For more information about this training and to receive an application contact Ashley St. Hilaire of COG. E-mail: [ashley@cog.ca](mailto:ashley@cog.ca) Phone: 613-216-0741 or 1-888-375-7383 [www.cog.ca/news\\_events/inspector/](http://www.cog.ca/news_events/inspector/)

### Ciudad Quesada, Costa Rica. Advanced Organic Inspector Training, March 20 - 21

IOIA will sponsor Advanced Organic Inspector Training at the Tilajari Hotel Resort & Conference Center on March 20-21, preceding the IOIA AGM on March 22. IOIA and Eco-LOGICA will cosponsor advanced organic inspector training on grower group inspections and certification on March 20-21. On March 18-19, IOIA will host a 2-day Spanish language training by the USDA National Organic Program for NOP-accredited certification agencies. IOIA will manage logistics and training will be provided by the NOP. The training is open to certifiers, inspectors, and government agency personnel. On March 24, field trips to area organic operations including pineapple production are scheduled. (See front page, website training schedule and IOIA AGM Page for more.)

### San José, Costa Rica, Processing Inspection Course – March 24-28

IOIA and Eco-LOGICA will cosponsor a 4.5 day Basic Organic Processing Inspection training using USDA National Organic Standards as a reference, in Spanish language. Please contact Sue Wei at ph.: (506) 4010-0232 or (506) 2297-6676, fax: (506) 2235-1638 or e-mail: [swei@eco-logica.com](mailto:swei@eco-logica.com) for more info.

## 2014 Trainings in Development

IOIA is developing Basic Organic Crop and Livestock Inspection Training in Kentucky in May 2014. Pennsylvania Certified Organic and IOIA will cosponsor Crop, Livestock, Processing, and Advanced Trainings in State College, Pennsylvania Sept 28-Oct 9, 2014. More information and application forms will be posted on the IOIA website as they are developed.

## Notes, from page 1

weak due to elapsed time or practice, or (c) the technology has moved ahead of us, thus making it difficult to inspect professionally in that area.

The international trainings have also been ahead of the previous years' level, so even though IOIA cannot charge the full rate for many of these events, the number of international inspectors that have benefitted has been very encouraging. As I once heard, and it applies to training, too, where the appropriate training level for the appropriate inspector expertise is provided: *"A rising tide raises all ships, the dinghy, and the ocean steamer, alike."* Thank you for your recent participation in IOIA's training program.

The planned annual meeting and advanced training/field trip in Costa Rica around the third weekend of March 2014 is progressing wonderfully, due to great local contacts, and good work by our office staff. The setting for the meeting is grand, economical, and a dream-come-true by many inspectors who over the years have expressed a desire to meet with fellow inspectors in *"The Rich Coast"* – Costa Rica.

Planning NOP training classes prior to the AGM – in Spanish – is an amazingly interesting development, where IOIA is providing the logistics for NOP to take their message to the south- and central-American certifiers, reviewers, and inspectors.

*So, plan to attend what should become a most flavorful, colorful, internationally-interspersed annual meeting venue, setting, and agenda – and come to learn, experience, share, and enjoy being part of the premiere international organic inspector training association, your IOIA.*

## Nightmare Mostly Over for Nebraska Inspector

IOIA Inspector Member Everett Lunquist was named in a libel suit in early 2012. He had submitted a written complaint to the NOP office in 2008 in which he asked to remain anonymous. The NOP investigated the complaint and revoked the operator's (Paul A. Rosberg) organic certification in 2011. The problem for Everett and his wife, Ruth Chantry, arose after the NOP Appeals office inadvertently released Everett's original complaint to Rosberg.

A final court order from Judge Merritt, dated September 30, denied Rosberg's request for reconsideration of the summary judgment ruling, declared Rosberg's actions as frivolous and meant to harass the defendant (Everett), and awarded Everett \$20,885.37 in attorney's fees and costs to be paid by the plaintiff. Rosberg did not appeal the order. However, collecting the award will be another matter.

"Our attorney confirmed that there has been no appeal filed & so, as they say, that is that. Collecting &/or receiving any of the attorneys' fees awarded by the court now comes as a separate process. Thank you again many times over to the expansive community of folks that have supported us with kind words, good thoughts, prayers & contributions along the way." Small grants and donations both large and small from friends, inspector colleagues, church members and others have totaled about half of the total expense. This doesn't address the 350+ hours that Lunquist and Chantry put into defending the case. "While we are very glad for no reconsideration of the case by the judge, as well as very glad for some monetary recompense...we were, of course, hoping for a larger portion of the requested expenses to be awarded, as we are probably nearing \$50,000 in attorney's fees and expenses after the next billing."

**Want to help?** Go to [www.lunquistlegalfund.org](http://www.lunquistlegalfund.org)

## Costa Rica, from page 1

Rule. This training is open to certifiers, inspectors, government agency personnel. IOIA will provide on-site bilingual logistical support, but not English translation.

**Important dates: To reserve a room at Tilajari - December 17.**

**To submit an application for the advanced training or NOP training, February 13.**

For full details, see IOIA website Training Schedule and Annual General Meeting, and the last issue of The Inspectors' Report.

## 33rd Annual Guelph Organic Conference

January 30 – February 2, 2014  
Guelph, Ontario, Canada

Canada's premiere organic event Conference, workshops, free expo and sampling fair with farming and retail suppliers.

This 4-day event includes international speakers, seminars & intro workshops on key topics including, G.E. foods, organic production/certification, changing climates, eco-villages, earth buildings, farmland protection & food security. From producer to consumer, the workshops offer something for everyone. PLUS, there is an Organic Expo/Tasting Fair with 160+ exhibitors on Saturday/Sunday, free to the public. This is your opportunity to sample and purchase a wealth of organic, fair trade products. Meet the makers, movers & shakers and discover how to make many positive changes in your life. <http://www.guelphorganicconf.ca/>  
Promotional Poster: <http://tinyurl.com/nzasank>

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## IOIA Webinar Training Schedule

### 100 Level Webinars:

- **January 22 and 24. USDA NOP Processing Standards**

9:00 a.m. - 12:00 p.m. (PST). Two, 3 hour sessions. Trainer: Stanley Edwards.

This course will prepare participants to verify compliance with the NOP Processing Standards. It is recommended for processors, consultants, educators, and certification agency staff and can be used as a credential to seek work as an entry-level certification file reviewer.

- **26 de Febrero y 5 de Marzo. Norma para Producción Orgánica USDA NOP** 16:00 – 19:00 pm UTC. Dos sesiones de 3 horas. Presentador: Luis E. Brenes.

### 200 Level Webinars:

- **December 11. IOIA/OMRI Livestock Input Materials**

9:00 a.m. - 12:00 p.m. (PST). One, 3 hour session. Presenter: Lindsay Fernandez-Salvador.

This webinar covers how OMRI reviews livestock input materials and what livestock inspectors should look for during inspections.

- **January 14 and 16. Residue Sampling and Responding to Test Results**

10:00 a.m. - 12:00 p.m. (PST). Two, 2 hour sessions. Presenter: Nathaniel Lewis. Certification Coordinator for the Organic Handling and Organic Input Material Registration Programs for WSDA

This webinar will prepare inspectors and certifiers to comply with the requirements of the USDA National Organic Program final rule on residue sampling. The course covers all relevant NOP regulations and Program Handbook documents. The roles of certifiers and inspectors will be discussed, as samples are followed through the entire process: setting up a residue sampling program, creating a sampling plan, providing inspectors with sampling directions, taking an appropriate sample in the field, communicating between the certifier and the inspector, maintaining the integrity of the sample, and responding to the results of sample analysis.

- **January 28 and 30. Livestock Feed Audits – grazing and non-grazing season**

8:00 a.m. - 10:00 a.m. (PST). Two, 2 hour sessions. Presenter: Sarah Flack.

This webinar will prepare inspectors and reviewers to assess whether there is enough feed available, and whether DMI requirements from pasture are met. It will include common feeds and feeding systems; DMD and feed consumption of both ruminants and non-ruminants; and discuss standards related to NOP and COR feed audits and pasture requirements. A pre-course assignment, mid-course assignment, practical exercises, and a post-exam are included.

**Coming Soon:** 100 Level COR Processing Standards; 100 Level COR Crop Standards; 200 Level Audit Trail/Audit Balance for Processing.

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## Guelph, Ontario, Advanced Inspector Training - January 31

IOIA will provide one-day of advanced organic inspector training in Guelph, Ontario on January 31 in conjunction with the Guelph Organic Conference.

Training topics include an update on recent developments with the review of the Canadian Organic Regime, introduced by **Hugh Martin**, Interim Chair of the Canadian General Standards Board's Technical Committee on Organic Agriculture. **Kelly Monaghan** and **Garry Lean**, IOIA Trainers, will speak to the updates on Processing, Crops, and Livestock. **Trevor Haywood**, an experienced private investigator, will speak on Effective Interviewing Skills. A session on Inspecting Organic Beekeeping will be presented by **Monique Scholz**, IOIA Trainer, Quebec. **Lindsay Fernandez-Salvador**, Program Director of the Organic Materials Review Institute (OMRI) will address issues for inspectors regarding Boiler Additives and Packaging. **Bill Barkley**, Canadian Committee Chair, will moderate the training, assisted by **Jonda Crosby**, IOIA Training Services Director. Participants will receive a Certificate for IOIA Advanced Organic Inspector Training, provided they meet the criteria for advanced training. Other participants are welcome and will receive a Certificate for IOIA Organic Inspection Workshop. Fees include tuition, course materials, and organic lunch. For more info about this training, contact Jonda Crosby, Training Services Director, at [jcrosby@mt.net](mailto:jcrosby@mt.net) or Bill Barkley, Course Moderator and IOIA Canadian Committee Chair, at [billb.otr@gmail.com](mailto:billb.otr@gmail.com). For information on the conference, including accommodations and directions, see [www.guelphorganicconf.ca](http://www.guelphorganicconf.ca).

## Notes from the ED

by Margaret Scoles

During the summer, I had the privilege of chairing (with help from Ib Hagsten) the On-site Inspection Sub-group of the Accredited Certifiers Association's **Sound & Sensible Initiative Working Group**. IOIA is a supporting member of ACA. We find the organization a great forum to engage in productive dialogue with certifiers. The WG's goal was to deliver input into the Compliance, Accreditation & Certification Subcommittee's Sound & Sensible discussion document to Mac Stone, NOSB Chair. Members of the WG reflected a broad coalition of the organic community, including certifiers, consultants, state certification programs, private certification programs, certified operations, and the National Organic Coalition. Connie Karr of OTCO chaired. Pat Kane, ACA Coordinator, compiled the final document.

The focus of work was "to provide specific proposals in relation to a Sound & Sensible Certification process without sacrificing organic integrity." The purpose of our outcome document was "to inform the NOSB of the areas that ACAs and inspectors believe could undergo additional scrutiny in relation to improving the certification process."

Our unwieldy 20-member Working Group broke into four Subgroups focusing on: (1) The Organic System Plan, (2) Noncompliances and Reminders, (3) Materials Review, and (3) The On-site Inspection. Our On-site Inspection Subgroup included two inspectors, three certifiers, and one consultant. In

a nutshell, our sub-group's conclusions as presented in the final document were as follows (*with minor abbreviation to save space*):

**OSP Updates:** Inspectors believe that it is critical that the NOP clarify that there are multiple correct ways to update an OSP, including changes being made by the operator and inspector at inspection. The recent move aimed at getting all the updates before the inspection is clearly working against streamlining inspection by adding time to the certification process. Multiple communications are going back and forth between inspector, certifier, and operator for fairly insignificant details that could be dealt with at inspection. Any OSP update forms should be limited only to those documents most likely to change (i.e. Seed Lists, Materials List, Annual Crop List). The Inspection Report could emphasize those things found to be a deviation from the plan or otherwise unusual.

### Recommendation:

**NOP Guidance clarifying that there are multiple acceptable ways to update an OSP, including changes being made by the operator and inspector at inspection.**

**Exit Interview Process and Exit Interview Document:** Certifiers often have very rigid inspection report forms (often 10 or more pages long) that inspectors must complete while on-site or after leaving the operation. In most cases, the inspection report body could be much shorter if the Exit Interview process and document included OSP updates, follow-up to certifier's requests, follow-up to last year's non-compliances, scope

of inspection, as well as issues of concern and further information needed. The focus of the body of the report could be reporting things that could not be verified, things that were inconsistent with the OSP, or that were unusual.

The Exit Interview document is critical because it is the one document that is co-signed by the operator and the inspector. While ACAs generally require specific discussion of and documentation of noncompliances during the Exit Interview, the Exit Interview is neither well-enough used nor understood. Properly used, it ties together updates, reports, and reviewers. In general terms, everyone understands what is to be covered in the Exit Interview (issues of concern and further information needed).

Currently, the Exit Interview forms used by different certifiers vary widely. They are often free-form, relying on the knowledge of the inspector on how to structure and report audit findings and non-compliances. Potential non-compliances are often buried in the body of the report and not re-iterated on the Exit Interview document. A study of EPA and state inspection reports that is cited in IOIA basic training showed that 5 out of 10 non-compliances are lost due to poor report writing. One of those five was described as "non-compliance buried in poorly written report". Industry-wide, there is much less focus on structure of the Exit Interview (both process and document) than the inspection report, when the exit interview is actually more important. Great inconsistency in what certifiers expect and what inspectors are doing has resulted.

The exit interview should summarize updates to the OSP. As described above, updates at inspection are still often the best way to update minor changes. A comprehensive Exit Interview document would provide both the certifier and the accreditors with information that could be readily used to see if inadequate OSPs are being pushed through the system without adequate initial review. Adding the OSP update summary to the Exit Interview could be one acceptable way of documenting the update. Because the operator has a copy, it eliminates the need for copious copies, hard copy follow-up mailings, or the possibility that the operator will not have a current plan. Also, it would become very clear and transparent how much of the updating is happening at inspection. Non-compliances are more likely to be caught.

In addition to providing solid information to the certifier on all potential non-compliances, the exit interview fills a positive role in process improvement, education, and in assisting compliance. As two examples:

1. Kelp used in organic livestock feed must be organic by March 4, 2014. Feeding non-certified kelp in 2013 would not result in a NONC. However, by noting it on the exit interview document that non-certified kelp is used and operator is aware of the deadline, the inspector helps reinforce the operator's memory that this issue will be followed up on the following year.
2. If a label has been printed and used without prior review for the certifier, the exit inter-

view can note this and serve as a reminder that labels must be submitted for approval. If the label was actually compliant, no NONC will be issued. However, the exit interview serves as education for continuous improvement.

#### **Recommendations:**

##### **1. NOP guidance or instruction to certifiers on the Exit Interview Process.**

##### **2. NOP/ACA/IOIA Training Topic on Doing a Good Exit Interview (Process and Document) – ED** *Note: this training topic is on the agenda for the upcoming training in February in San Diego.*

**Inefficient, onerous forms:** ACAs and inspectors are not in favor of standardizing forms. (*ED Note: This is not a unanimous IOIA position. However, it was the conclusion of our group.*) However, we all agreed that poorly constructed forms (whether OSP, inspection report, or other), are contrary to Sound and Sensible. And if inspectors are spending as much time writing long reports after the inspection as they are on inspection, it is also counter to Sound and Sensible. Both are inefficient and costly. Focus should be on clear, concise forms.

#### **Recommendation:**

**The ACA should have a focus, through working groups and training sessions, on discussion regarding improvement of forms and the possible development of templates for members to utilize.**

**Inspector Qualifications:** The ACA

Working group agrees that inspectors are key to the process of maintaining organic integrity because they are usually the only people on-site and that some inspectors are not competent, either because of lack of technical knowledge or because of lack of proper training. Inspector competence does not equate to good inspector performance. The most efficient and cost-effective inspector is the well-trained, experienced, competent inspector.

**Recommendation: We encourage NOP to take steps toward implementation of the NOSB Inspector Qualifications Recommendation of December 2011. The recommendation includes good steps to increase inspector performance, including continuous education requirements and witness audits. Witness audits are valuable, but are currently vastly under-utilized.**

**Cost of Inspection:** We generally agreed that it is the cost of certification, not the paperwork burden that is driving smaller producers out of certification. All of our efforts to reduce paperwork and time on inspection will not financially make up for the loss of cost share. The cost of the inspection is a major part of the certification cost. It is unrealistic to increase demands on and expectations of inspectors at the same time cost is being used heavily in selecting inspectors. We must reduce the amount of paperwork being done by the inspector. Moving paper from the operator to the inspector does not reduce costs.

## SECTOR NEWS

### US and Japan sign organic equivalence arrangement

U.S. officials noted the organic equivalence arrangement will reopen the important Japanese consumer market for U.S. organic producers of all sizes, and will create jobs and opportunity for the U.S. organic food and farming sector.

Assessments conducted in Japan and the United States leading up to the signing found organic management, accreditation, certification and enforcement programs are in place in both countries, and conform to each other's respective programs. The first two-way trade agreement in Asia also marks the first organic equivalency arrangement without organic standards exceptions.

As a result, certified organic products as of Jan. 1, 2014, can move freely between the US and Japan. Under the agreement, MAFF will recognize USDA's National Organic Program (NOP) as equivalent to the Japanese Agricultural Standards (JAS) and the MAFF Organic Program, and will allow products produced and certified as meeting NOP standards to be marketed as organic in Japan. Likewise, the US will allow Japanese products produced and certified under the JAS Organic Program to be marketed as organic in the US. Both countries will require that the accredited certifier must be identified on the product label.

In June 2009, the United States and Canada signed the first equivalency agreement in the world for the organic industry. This was followed with an agreement signed

by the United States and EU in February 2012 recognizing each other's organic standards as equivalent, fully effective June 12, 2012.

NOP has posted extensive information related to the agreement.

<http://tinyurl.com/kp2gu34>

### USDA seeks comments on GE/Organic coexistence

USDA has finally published a notice in the Federal Register to solicit public comments on how agricultural coexistence in the US can be strengthened. As a result, comments will be accepted **through Jan. 3, 2014**. The Secretary's Advisory Committee on Biotechnology and 21st Century Agriculture (AC21) made recommendations in five major areas regarding agricultural coexistence. In the area of education and outreach, the committee recommended that USDA foster communication and collaboration to strengthen coexistence. USDA's notice seeks public comment to identify ways to foster communication and collaboration among those involved in all sectors of agriculture production. To submit an individual comment online, go to the Federal Rulemaking portal.

### DiMatteo is new Executive Director of SFTA

Katherine DiMatteo, a Managing Partner and Senior Associate of OTA member company Wolf, DiMatteo + Associates, has been tapped to serve as the Executive Director of the Sustainable Food Trade Association (SFTA).

### Comments extended for import and third-party certification

FDA will soon announce a 60-day extension of the comment period on proposed rules for Foreign

Supplier Verification Programs for Importers of Food for Humans and Animals and Accreditation of Third-Party Auditors/Certification Bodies to Conduct Food Safety Audits to Issue Certifications. The current comment period for both proposed rules ended Nov. 26, and so extension of the comment period deadline has been pushed back to late January.

### Farmers appeal to Supreme Court to seek protection

A coalition of 73 American organic and conventional family farmers, seed businesses and public advocacy groups has asked the U.S. Supreme Court to hear its case that challenges Monsanto's patents on genetically engineered (GE) seed. On June 10, a three-judge panel at the Court of Appeals for the Federal court ruled that the farmer and seed company plaintiffs were not entitled to bring a lawsuit to protect themselves from Monsanto's transgenic seed "because Monsanto has made binding assurances that it will not 'take legal action against growers whose crops might inadvertently contain traces of Monsanto biotech genes.'" In the case, the plaintiffs are asking the court to declare that if organic farms are ever contaminated by Monsanto's GE seed, their owners need not fear being accused of patent infringement. [Read the petition](#) filed Sept. 5.

### OTA executive transition

Laura Batcha, Organic Trade Association's Executive Vice President, and David Gagnon, OTA's Chief Operating Officer, are serving as Co-Interim Executive Directors following Christine Bushway's decision to leave her role with OTA after five years of service.

## Is IOIA Your Preferred Cause?

Let's face it. Most IOIA members don't really think of IOIA as a nonprofit.

Many nonprofits source significant revenue from donations; IOIA does not. But each year we have received a small portion of our operating funds from donor support. So who donates? Surprise! Nearly all donations come from within our membership. Perhaps another surprise, a small percentage of our members give year after year. What motivates some to support IOIA through donations on top of dues, how can we motivate more members, and better yet, how can we make giving attractive to non-members? These were questions that the new Fundraising Committee has been addressing. Garth Kahl and Margaret Weigelt bravely stepped forward to represent IOIA's Board. Jonda Crosby, IOIA's Training Service Director, brought her years of fundraising and donor work experience from her previous position as a nonprofit executive director. Susan Colwell, IOIA trainee, former supporting member, and current monthly donor, advised and supported this work. Diane Cooner encourages donations through IOIA's website, and Joe Whalen raises awareness through Facebook.

### Directions and successes:

**Patrons and Sustainer Memberships:** After pondering potential conflicts of interest, gift acceptance policies, and donor confidentiality concerns, the committee decided to focus not on donations, but instead on increasing the Patron and Sustainer Member categories. Supporting business members are being invited to step up the ladder to a higher membership level.

**Monthly Donors:** With Colwell's help, we raised the visibility of the monthly donor category. We dubbed it the "Evergreen" category and identified a nucleus to invite personally into the "Evergreen circle". As Colwell says in her letter to potential donors, "When I started to donate, I gave monthly. Then, it occurred to me, why don't I donate to IOIA like I do to Minnesota Public Radio and every other nonprofit I contribute to? It's so easy to set up. I don't have to remember to send in my check or go online every month. My donation is just deducted from PayPal. I am a sustaining member of IOIA's Evergreen circle and passionately believe in IOIA's existence and growth!" Colwell, a monthly donor since 2010, has donated Earth-Wise tote bags, 'America's First 100% Biodegradable & Compostable Non-Woven Reusable Shopping Bag'. **The first 50 monthly donors will receive one by mail to express IOIA's appreciation.**

**Re-training for the ED:** Margaret Scoles took two days of fundraising training, Oct 2 and Oct 14. Both events were sponsored by the MT Nonprofit Association (IOIA is a member). She says, "No one likes asking, but there is so much good work we could do with more donations. And people don't give when they aren't asked. We deserve broader support from the industry that benefits from our work. Inspectors are the hard line, on the ground, to protect organic integrity. "

**Supporting members:** A supporting business membership drive has been initiated. The committee drafted a letter intended to bring in more supporting members and/or donors.

**Volunteers anyone? Donations anyone? Names of businesses or entities IOIA should contact?**

## GUEST OP-ED

### Farm Bill has Poison Pill for Accredited Certifiers and Certified Operations

By Richard D. Siegel

All NOP accredited certifying agents and certified operators who are reading this IOIA Inspectors' Report need to know that there is an obscure section tucked into the 700-page House Farm Bill which could have a serious impact on you. This is Section 10005 in the House Farm Bill H.R. 2642, dealing with Investigations and Enforcement of the Organic Foods Production Act.

House Section 10005 is not yet in the final Farm Bill. On October 30 Senators and Congressmen began meeting in a "Conference Committee" to resolve differences between the Farm Bill passed by the Senate, S. 954, and the version of the Farm Bill passed by the House, H.R. 2642. The "Conference Committee" will [see **OP-ED**, page 11]

## CANADIAN ORGANIC NEWS

### Organic Technical Committee to Meet

The first meeting of the CGSB Technical Committee on Organic Agriculture in almost four years is scheduled for this December 11-13 in Gatineau, Quebec. IOIA holds a voting seat on the committee. Kelly Monaghan, past OTC chair, serves as IOIA's representative. Her participation in this meeting is supported by the Organic Federation of Canada, based on her history of working with the OTC and institutional knowledge of discussions from two of the working groups and in her role as Chair.

### Rochelle Eisen Receives CHFA Organics Achievement Award

Congratulations to Rochelle Eisen, Resilient Solutions Consulting, who was recognized for her 26 years of contributing, in various capacities, to the development, growth and promotion of the organics industry. She is a long-time inspector member of IOIA. The Canadian Health Foods Association awards are announced annually at the CHFA East, West, and Quebec. They recognize a producer, wholesaler or manufacturer of organic food for overall excellence. <http://tinyurl.com/kwlnbk5>

### Dag Falck Elected President of COTA's Board

The Canadian Organic Trade Association (COTA) Board of Directors has elected Dag Falck of Nature's Path Foods as President. Falck will also serve as Vice President—Canada on COTA's Board of Directors. Dag is a former IOIA board member. IOIA member Kelly Monaghan is also currently serving with COTA.

### CFIA Joins Health Canada

The Canadian Government kicked off a transition plan to shift the Canadian Food Inspection Agency to join Health Canada and the Public Health Agency of Canada in reporting to the Honorable Rona Ambrose, Minister of Health.



The reorganization will strengthen Canada's food safety system by bringing all three authorities responsible for food safety under one Minister. To find out more, visit the [Health Canada](http://www.healthcanada.gc.ca) website

### IOIA COR Processing Webinar Re-scheduled

Canada Organic Regime Processing Standards, a 100-level webinar, is being re-scheduled. Originally scheduled Nov 19 and 26, the webinar is being rescheduled for late winter. The course is offered in two sessions, on two dates, each three hours long. Enrollment is limited to 20. The webinar is available in the US and Canada via phone or VOIP, available elsewhere via VOIP. The presenter is experienced organic inspector and IOIA Trainer, Kelly A. Monaghan.

This 100 level webinar training course will cover the Canadian Organic Regime (COR) as it pertains to processing operations. The training will prepare participants to verify compliance with the COR Processing Standard. It is also highly recommended for working inspectors and reviewers who have taken a basic processing inspection course to a standard other than the COR. This course can be used as a credential to seek work as an entry-level certification file reviewer. Organic handlers, processors, consultants, educators, extension and certification agency staff have found this course to be "an exceptional and worthwhile training".

This Webinar Training course will focus on topics including the Organic Products Regulations, the General Principles and Management Standards (aka "the Standard" - CAN/CGSB-32.310) and the Canadian Permitted Substances Lists (aka "the PSL" - CAN/CGSB-32.311). Participants will gain skill in navigating the Organic Products Regulations as well as the Standard and PSL, understanding the labeling rules, inspection and certification requirements. It will also cover the issues relating to Canada's equivalency arrangements with the USA and the EU.

The course is comprised of 3 components: self-study, webinar, and evaluation. The self-study component includes exercises that are completed and submitted in advance of the webinar and encourages participants to prepare and explore resources related to COR processing standards. The webinar will include in-class discussion, examples, exercises and the opportunity for questions and answers. The course concludes with an exam to evaluate individual learning. Check the IOIA website for announcement of the rescheduled dates.

### Canadian Statistics Report Update

COTA is in the process of finalizing the "Canada's Organic Market, Growth, Trends and Opportunities" report. The first overview of the Canadian organic market since the Government regulated the sector in 2009, this study will provide the most up-to-date and comprehensive information on market size, growth trends and Canadian organic consumers. To find out more or to pre-order a copy of the report, contact [Julia Bustos](mailto:julia.bustos@cota.ca). COTA and OTA members receive a 55% discount.

## OP-ED, from page 9

decide whether House Section 10005 goes into the final Farm Bill. As this *Inspectors' Report* goes to press, the Conference Committee is still holding discussions to arrive at a final Farm Bill.

If the final Farm Bill comes out and the “give-and-take” results in House Section 10005 being included, then this would be serious. This would mean that whenever a certifier would face suspension by the NOP of its accreditation, or a certified operation would face suspension by the NOP of its certification, the certifier or certified operation would not have the right to appeal that suspension. Under current NOP regulations, the NOP must first issue a “proposed suspension” and this gives certifiers and certified operations 30 days to submit an appeal to the Administrator of the Agricultural Marketing Service (AMS), the parent agency of the NOP.

This right to appeal notices of suspension issued by the NOP is crucial. Certifiers and certified operations rely on and use this right of appeal whenever they are faced with suspension by the NOP. After an appeal is filed, the NOP cannot suspend a certifier’s accreditation, or an operation’s organic certification, until the appeal has been decided. This guarantees that the NOP cannot deprive a certifier or certified operator of its NOP status until they have had “due process of law.”

Under the current NOP regulations, the right to appeal a suspension is by an “informal appeal” to the AMS Administrator. These appeals are “informal” because they do not involve “formal” hearings before a judge. An “informal appeal” is made in a letter stating all the reasons why the suspension was not proper or did not comply with the NOP regulations, policies or procedures.

Most “informal appeals” to contest

NOP enforcement actions result in settlement before the AMS Administrator has to rule on them. From 2004 to 2012, 53 of these “informal appeals” were not settled and so the AMS Administrator ruled on them. In 11 of those 53 cases – more than 20% of the total – the Administrator ruled in favor of the appellant. Thus these 11 appellants who pursued their appeals were able to keep their NOP status as a result. While for the most part NOP enforcement actions are sufficiently well-founded, this shows that in those specific cases where NOP enforcement action has been arbitrary, certified operators and accredited certifiers can utilize the “informal appeal” process to obtain justice. Section 10005 of the House Farm Bill would allow the NOP to make suspensions without allowing “informal appeals.” The NOP could crack down quickly on organic operations and certifiers once they are found guilty of “recklessly” committing violations of the rules, Section 10005 does not define “reckless,” so it gives the NOP wide latitude. The NOP would haul alleged violators before a USDA Administrative Law Judge in an “expedited administrative hearing.” If the NOP wins, it would issue a suspension in five days, with no right of appeal.

This section surfaced in the House Farm Bill without any hearings or debate on its merits. Since 2010 the NOP has planned to “streamline” the existing appeals process, but in numerous public documents the NOP has said this would be done by “agency rulemaking.” “Rulemaking” is when a Government agency proposes changes in the regulations, gives full notice in the Federal Register and solicits public comment before it makes final changes. This is the standard way for a Government agency to make changes in its regulations. While Congress can also make changes in agency regulations by passing laws, in this case the Farm Bill should not change the existing NOP regulations. There were

never any hearings in Congress as a basis for adopting Section 10005.

Therefore, because the right to “informal appeals” could be wiped out by Section 10005 of the House bill, organic certifiers and certified operators need to contact members of the Conference Committee from the House immediately and register their opposition to Section 10005 of the House Bill. Here are the key members to contact about Section 10005:

Honorable Frank Lucas (Oklahoma),  
Chairman, House Agriculture Committee

Telephone 202-225-2171

Fax 202-225-0917

Honorable Austin Scott (Georgia)  
Chairman, Subcommittee on Horticulture, Research, Biotechnology and Foreign Agriculture

House Agriculture Committee

Telephone 202-225-6531

Fax 202-225-3013

In addition, the following House members also serve on the Farm Bill Conference Committee. If one of these members is your own district’s Representative, you should contact your own Representative as well:

Honorable Steve King (Iowa)

Honorable Randy Neugebauer (Texas)

Honorable Mike Rogers (Alabama)

Honorable K. Michael Conaway (Texas)

Honorable Glenn Thompson (Pennsylvania)

Honorable Rick Crawford (Arkansas)

Honorable Martha Roby (Alabama)

Honorable Kristi Noem (South Dakota)

Honorable Jeff Denham (California)

Honorable Rodney Davis (Illinois)

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

## 2013 IOIA Member Survey Results

The first inspector membership survey since 2007 was completed by the IOIA Membership Committee and the IOIA Board of Directors. Survey Monkey was used to gather data. Results were tabulated into a report by Diane Cooner. Questions and Responses are summarized here. Some questions have been abbreviated to save space. The full report is available on the IOIA website - Inspector Members only.

More than 40% of the IOIA members took the survey. The BOD is grateful to members who provided the input to make decisions regarding key directions and activities for IOIA, especially regarding food safety training, digitizing the IOIA newsletter, and ideas for new membership benefits. Thank you!

**Maheswar Ghimire** of Nepal won the ‘early bird’ drawing of an IOIA cap. **Chris Kidwell** (As Membership Committee Chair, who could deserve it more?!) won the drawing for a second cap.

Results have been studied by the Membership Committee and that analysis reported to the IOIA BOD by Stuart McMillan. As Vice-Chair, Stuart serves as the BOD Liaison to the Membership Committee.

### Section A: Inspections

**A1. On average, how many annual inspections have you performed over the past five years in the following categories (wild-harvest, processing, personal care, livestock, fiber, farm crops)?** About 60% of the inspectors responding have performed 75 or less inspections annually over the last 5 years. As expected, the categories with the least inspections were wild-harvest, personal care, and fiber. On the high side, about 14% of the respondents had done more than 250 processing inspections annually, a reflection of the fact they can be done year-around. Only 5.6% of the members had done that many livestock inspections and 7.7% that many crop inspections.

**A2. What percentage of your income comes from organic inspection?** Most inspectors responding indicated part-time income from inspections. Nearly a third responded in the 0-19% range. The responses in the categories of 20-39%, 40-59%, 60-79%, and 80-99% were very similar. Just 11.6% derived 100% of their income from organic inspection.

**A3. Are you an independent inspector or certifier-staff?** 83% responded “independent inspector”, and 17% “certifier staff”.

### Section B: Accreditation

**B1. Have you ever applied to become an IOIA accredited inspector?** Nearly 80% responded “No”.

If YES, what benefits do you feel this has provided for you? The top two responses – 80% each - were “Enhanced reputation among certifiers and other inspectors” and “Personally, to have an evaluation by my peers.”

If NO, you have not ever applied for or become an IOIA Accredited Inspector why not? More than 80% responded that the apparent value/benefit does not seem worth the effort, and 14.75% were not aware that IOIA offered accreditation.

**B2. Would you be more likely to become an accredited member if it was recognized by the NOP or other governmental bodies?** 68.5% answered ‘yes’; 10.9% were already accredited.

### Section C: Your IOIA membership

**C1. What one new product or membership service would you like to see IOIA add, if possible?** This question elicited 55 useful and insightful comments and ideas.

**C2. How would you rate your satisfaction with IOIA with regard to membership fees compared to services and benefits received?** Just 10.8% said they felt that the membership fee is a bargain and would be willing to accept a reasonable increase. And the same number said they felt the membership fee is not quite justified by the services and benefits provided. More than half (53.8%) said they felt that the membership fee is well-worth it. More than a fourth (26.88%) said they were generally satisfied but would like to see more services and benefits.

### Section D: IOIA and Food Safety

**D1. IOIA is exploring a collaborative opportunity to provide training in Food Safety for organic inspectors and others. This could provide useful cross-training in Good Agricultural Practices (GAP) and HACCP and additional work opportunities for organic inspectors. .... IOIA’s Board is seeking input from the membership on whether this would be a positive direction for IOIA.** Response: “I feel that this is a good direction for IOIA and would be interested in participating as an auditor” – 34.1%. “I feel that it is worthy of further exploration but I need more information.” - 35.2%. Several comments cautioned IOIA not to focus on this project as to detract from IOIA’s core mission.

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## Section E: IOIA Website and Social Media

**E1. Which of the following do you use on a regular basis? (IOIA Website, Facebook, LinkedIn, Twitter, Google+)** Response: Of the respondents, 56.7% used the IOIA Website regularly, Facebook 41.1%, LinkedIn 27.8%, Google+ 20%, and 28.9% said “None”.

**E2. Which of the following do you plan to use in the next 12 months, if you are not already using them?** Again, the IOIA website was the clear winner at 65.6%, with Facebook at 40.5%. More than a fourth of the members responding chose “None”.

**E3. As IOIA formulates a social media strategy, how would you like IOIA to use Social Media?** This question elicited lots of comments, many lukewarm. Several commenters said they did not use or appreciate social media. A few stated that they already spend too much time at the computer.

A sample of the comments –

“Promoting the reality of the oversight involved in certified organic production. When speaking to non-industry people who are interested I find that they are amazed to learn how much is behind the organic label.”

“Facebook works well to inform the general public and could be used to lift our profile in the broader public.”

“Tell the inspector’s story & tell the organic story.”

“Depends on the social media - I can see Facebook as a way to inform the general public on what IOIA is and its importance to the organic industry. LinkedIn as a way to stay in touch with inspectors and what is going on in and being said about the organic industry. Twitter as being a general way to keep folks, folks being both inspectors and the general public.”

## Section F: IOIA Newsletter

**F1. IOIA is weighing the cost of printing hard copy newsletter and the time lag between printing and members receiving the newsletter against providing an electronic newsletter.** Just 21.5% said they would prefer to continue receiving four issues/year in hard copy. Almost half (48.4%) said they would prefer to receive the newsletter as electronic only, and 35.5% thought members should be given a choice of hard copy or electronic, recognizing that hard copy subscriptions may be accompanied by a cost additional to dues.

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## Resources

**The new online [Farm Transitions Toolkit](#)** helps owners of farmland plan to leave their farms to the next generation. This comprehensive resource was created by the Land Stewardship Project (LSP) and the Minnesota Institute for Sustainable Agriculture (MISA). The Toolkit contains resources, links to services and practical calculation tables to help landowners establish a commonsense plan. It also features user-friendly resources on the economic, legal, governmental, agronomic, ecological and even social issues that must be considered.

**USDA creates grass-fed beef market report** The USDA AMS now offers a [market news report about grass-fed beef](#), which includes market commentary, prices paid for live cattle, wholesale beef prices, and direct-market beef prices. The first monthly report was issued in late September.

**New TOC website** The Organic Center, which is under the administrative auspices of the Organic Trade Association, has launched The Center’s new Generations of Organic website, [www.Organic-Center.org](#). This invaluable communication tool will be an integral component of The Center’s effectiveness in reaching industry, media, educators, and anyone interested in issues regarding organic products.

**Textile Exchange releases 2012 Market Report** Seventy-one percent of companies surveyed indicated they will increase their organic cotton use in 2013, according to Textile Exchange’s 2012 Market Report. This latest report also includes two TOP 10 lists—one for organic cotton growth by volume and the second for organic cotton percentage increase over the previous year. For more information, go to Textile Exchange’s [website](#).

**Organic Seed Alliance’s new website** Celebrating its tenth anniversary, the Organic Seed Alliance has launched [a new website](#) to make it easier to download its guides, register for events, receive timely news, and more.

**OMRI offers input product list for Canada** The Organic Materials Review Institute (OMRI) has announced that the OMRI Products List®, the oldest and largest list of input products for use in USDA organic production, now has a counterpart for organic production under Canada Organic Regime (COR) standards. The first ever [OMRI Canada Products List®](#) is now available as a free PDF download on the [OMRI website](#).

**Institute for agriculture and trade policy.** Always a good read on agricultural topics worldwide. [www.iatp.org](#)

## IOIA Basic Crop Inspection Training takes on Flooding in Colorado

by Demetria Stephens

IOIA partnered with the Colorado Department of Agriculture in September to hold its first joint open enrollment training in Colorado. The Basic Crop inspector training started out normal as lead trainer Garry Lean and co-trainer Margaret Scoles laid out the overview for the four-and-a-half day basic crop training for the 25 trainees at Sunrise Ranch near Loveland Colorado. Trainees came from as far as Florida and Oregon, British Columbia and Quebec.

Another first for IOIA; the Colorado 'thousand-year flood' forced the cancelation of two of three farm tours for the first time in the 20 year history of IOIA training. Though the week had started with sunshine, by the third day reservoirs had filled with recent rainstorms and the canyons started flooding. Trainers Lean and Scoles made effective decisions to adjust to the flooding conditions and provide a complete training despite the challenges.

Trainees also got tested in their inspector perseverance as rain altered the plans for the farm/field tours. After the three groups got on the road, the host farmer for my group called to cancel. We were on a bus with one other group and I didn't hear complaints as we had seen flooded fields and rivers over their banks through the bus windows. Scoles and the third group leader Jonda Crosby had to improvise an alternate plan. They tried to continue to the next farm with both groups and we quickly scanned the next farms' OSP. After two hours trying to find an open bridge to cross the river, the bus came to the last possible road to the next farm: it was closed.

A third option to allow participants to complete the on-farm inspection was quickly added to the options. When IOIA first contacted the Sunrise Ranch, the ranch staff asked if its farm could be part of the mock inspections. The farm wasn't chosen at the time because, even though it used organic practices, it doesn't request organic certification.

With the changed circumstances, Scoles re-contacted the Sunrise Farm to give the two groups of trainees the opportunity to ask Derik Lane, the Sunrise Ranch's farm manager, about his operation. A lot of the training came out in the questions. We asked about inputs, about water quality, keeping in mind the record keeping requirements and the potential concern of runoff from non-organic neighbors.



to ask Derik Lane, the Sunrise Ranch's farm manager, about his operation. A lot of the training came out in the questions. We asked about inputs, about water quality, keeping in mind the record keeping requirements and the potential concern of runoff from non-organic neighbors.

The farm was approximately two acres, within walking distance of the conference building. It was surrounded by hills, trees and pastures. It grew vegetables for many of the meals served during the training, with everything for a salad and then some. It was complete with a partially underground greenhouse and ducks and geese that help manage weeds and insects. The farm doesn't request certification because it doesn't sell its produce off-farm.

Scoles said no inspection reports would be written on the Sunrise Ranch farm, but that we could use the experience to practice interviewing skills and note taking. Instead, the Scoles and Crosby groups wrote reports on the farms they were supposed to tour, with more information provided from the actual inspection reports that were completed for each farm in 2013.

Scoles said she got the hang of roleplaying what might have happened during her group's mock inspection and gave her group some observations. Crosby, my group leader, said she would grade reports keeping in mind trainees couldn't write about something only available through observation, such as what the crops looked like.



Garry Lean's group had its operator nearly cancel because of the flooding after the group already arrived, but the group successfully completed its tour and got a reasonably normal assignment, a report written from observations.

All the normal report and test preparations were interrupted again during the evening when roads around the Sunrise Ranch were reported to be closing by morning. About half of the trainees decided to drive into Loveland while they could still get out. Some who lived in the area said they had livestock to tend to and one trainee had a flooded basement.

That threw another challenge at the trainers, who had to set up emergency proctored off-site exams the next morning, when several training participants could not return to the training site.

Amy Stafford, CDA's Organic Program Manager, stepped in to help with the training by providing proctoring for training participants at the CDA headquarters in Denver.

The remaining trainees who opted to stay to complete their field trip report could be found at open tables, beds and floors with papers spread around them. Trainee Zebulon Martin from Mount Vernon, Ohio, drove a few adventurous peers to the Loveland Water Storage Reservoir and the remaining open bridge out of the Sunrise ranch.

The first inspection report was submitted before midnight that evening in my group and the last one at the morning deadline. No one seemed to be panicking in the morning, either from test-anxiety or the extreme weather conditions.

One trainee wrote in their evaluation after it was all over, "This course was extremely intensive and really brought home the importance of inspection and how to go about it in the most thorough way."

We later heard via email from IOIA that everyone passed the exam and, more important than usual, got home safely.

### Every Picture Tells A Story

Opposite page: June Wallenburg (left) and Mica Wempe checking out flood waters at the Loveland Water Storage Reservoir, two miles from the IOIA training at Sunrise Ranch. Photo credit Zeb Martin

Above: Derik Lane, Farm Manager, generously hosted the Crosby/Scoles groups for an impromptu tour of the Sunrise Ranch production garden, so everyone had the opportunity to see an organic farm and interview an organic farmer.

Right: We didn't get a group photo. Ten participants enjoyed supper together with the training team on Sept 12, field trip day. Many of them had hoped to hear Joel Salatin, who was booked to speak the next day. His appearance was cancelled due to the flooding.



## Basic Farm Inspection Training in Mexico - Sept 2013

by Manuel Rodríguez (Cosponsor, BioAgriCertMexico)

Last September we had a cosponsored Basic Organic Farm Inspector Training with IOIA with Luis Brenes as our trainer, I only wish we had done it before, the experience was very enriching, the workshop is very comprehensive and a great help into understanding the subtleties of the organic regulations and its application.

It is very well designed and practical, it provides the inspector with a broad perspective and helps him to focus in the main targets as to deliver a comprehensive inspection report in compliance with the norm.

Desde antes, durante y despues del curso pude percibir la objetividad y alcance del entrenamiento, ahora puedo decir que aplicando el conocimiento adquirido en el curso es lo que debemos hacer en el organismo de certificación y los inspectores para estar en concordancia con el esquema/norma NOP sin menosprecio o descalificaciones del trabajo de los que realmente son productores de agricultura orgánica.

### Participants Comments: Participantes Comentarios

**¿El curso? WUUUUOOO, excelente!** El contenido y la forma de desarrollo muy prácticos **y con referencia bibliográfica electrónica. Se los recomiendo. Yo lo tome en 1998, la primera vez, en Oaxaca.** *Crisóforo Hernández H*

Participé en el curso básico de inspección de fincas orgánicas, celebrado del 9 al 13 de septiembre de 2013, en Uruapan Michoacan, México por el Ing Luis Brenes. Es la primera vez en 8 años como inspector orgánico que recibo una capacitación; clara, precisa, apegada a norma y sobre todo amena que me permitió refelexionar respecto a mis responsabilidades como inspector orgánico. Agradezco el profesionalismo que demostró el Ing. Luis Brenes como instructor y amigo para lograr transmitir sus conocimientos técnicos y personales logrando con ello que reconociera mis errores y pusiera atención en corregirlos. *ATENTAMENTE Ing. Héctor José Vega Arreguín*



Salí muy complacido del curso por su gran contenido, por el dominio del tema que tiene el instructor (normatividad – técnico agronómico) y la facilidad con que lo aborda. Felicidades. Reciba mi reconocimiento y un saludos cordial. Atte., *MCS. José G. Dávila Hdz.*

El curso represent para mi una experiencia invaluable, me permitió ubicarme mejor en el papel del inspector y me permitió desarrollar mejores técnicas para llevar a cabo la inspección y el cierre de la misma. El es-

uchar tus experiencias y las de mis compañeros fue also a lo que no se da fácilmente y se tiene la oportunidad de enriquecerte.

La experiencia del instructor me permitió comprender fácilmente el objetivo del curso, espero que podamos repetirlo en otros temas para mejorar la calidad del servicio que prestamos. *Pablo Torres*

## JOIA's Farm and Processing Courses

Japan Organic Inspectors Association held both courses concurrently September 2-5, 2013 at Kyurian, Tokyo, Japan. Mutsumi Sakuyoshi gave the Processing course with 12 participants [photo on left] and Yutaka Maruyama the Farm course with 14 participants [photo on right].

*"The Farm field trip on the right shows a typical type of farmer's packaging facility. In the back in the middle, the man in the white shirt is a farmer. Note the photovoltaic panels on the roof. It is a typical type of farmer's place in this area."*



## Advanced Training on NOP in Australia

By Stanley Edwards

While AusQual has a small group of organic certified clients, the organization is a large food certification body in Australia that handles thousands of audits a year. Certifications range from BRC food safety to Global Gap, Freshcare and of course NOP Organic certification. The company is a non-profit organization and started as the main organization to handle live cattle and meat inspections for the Australian government's export program.

I had the pleasure to travel to Brisbane this fall for a 2-day advanced training on NOP standards and organic inspection protocols. After a 20-hour transit from the US, one of the first auditors I met at the office, told me she had read many of my reports! It turns out, Stephanie Goldfinch was an IOAS auditor who travelled the globe for many years auditing organic certification bodies. Her long time perspective on organic standards, and inspection protocols added much to the discussions during the course. The group of auditors attending the class all had extensive auditing experience, specifically with beef and slaughter houses as well as Freshcare. This experience made for lively discussions and active participation by each attendee during hands on exercises and engaging each topic projected on the screen.



Much time was spent discussing the NOP pasture rule. AusQual certifies some very large range cattle operations with a year round grazing season. Drought conditions have required these operations to periodically provide supplemental feed. Understanding the OSP and audit requirements for these situations can be challenging, when essentially, the operations meet the standards but still have to show it and be auditable.

Australia has a robust organic and biodynamic standard. While most of these requirements are similar to the US and other worldwide organic standards, there is no equivalency with the NOP. The USDA must therefore accredit certifiers in Australia that wish to offer NOP certification.

## 2013 IOIA Basic Crop Inspection Training Co-Sponsored By NOFA-NY Certified Organic, LLC

By Erika Worden

During the week of October 21-25, ten students gathered at the Riverwalk Hotel in Binghamton to take part in the IOIA Basic Organic Crop Inspection Training under the excellent guidance of instructors Garry Lean and Margaret Scoles. Students came from a variety of backgrounds ranging from prospective inspectors to organic certification staff to consultants and farm managers. During the first three days of class, we learned about IOIA and the role of an inspector, the NOP standards for crop production, how to prepare and make a plan for an inspection, and how to conduct an inspection. We also delved into the assessment of input materials to be able to distinguish if a material is prohibited for use. Further, we learned how to effectively write an inspection report and cite issues and also how to conduct an audit trail and audit balance and calculate crop yields. By



the fourth day we were ready to go out on a field trip to conduct a training inspection. To do this, the class was broken into two groups of five students each to go to two different crop operations in the area, Buried Treasure Farms in Groton, NY owned by Doug Newman & Mary McGarry Newman and West Haven Organic Farm in Ithaca, NY owned by John & Jennifer Bokaer-Smith. Each student in the group was given a particular part of the inspection to lead while at the farm whether it was the introduction/opening meeting, the actual field tour, or going over the records with the producer.

After the field trip we were given the chance to debrief and coordinate all information necessary to write our inspection reports that evening (and all night long). The last day of training was the shortest with a wrap-up and group photos in the morning followed by a final open book exam. Thanks to this course, students gained invaluable knowledge and training in the organic standards and how to conduct an organic inspection as well as write an inspection report. We would like to thank the Newman and Bokaer-Smith families for graciously allowing us to use their farms for our training inspections. Good luck and best wishes to all who attended.

### IOIA Training on Three Continents!

When Isidor Yu, IOIA BOD member, Trainer, and contact for the cosponsoring Korea Organic Inspectors Association, asked if IOIA could host an in-house training for Controllo dei Prodotti Biologici (CCPB), an Italian certification body, while he presented from Korea by webinar, IOIA responded, "Sure!" The response was a bit nervy, but all went well. Fifteen participants completed the training in two 3-hour sessions on November 5 and 6 and earned a certificate for IOIA/KOIA training. The webinar technology worked well, and the trainer was expert on the topic (Korean Organic Regulations). The most challenging aspect? Finding a time zone that worked for a presenter in Korea, an audience scattered across Italy, and tech support located in Broadus, Montana! Parties on all three continents connected via Skype, and Kathy Bowers provided tech support from her cattle ranch 20+ miles from Broadus. Sacha Draine, International Training Manager, originally from Switzerland, managed the event for IOIA.

## Processing training NY

by Sarah Costin

On October 21st – 25th we came from as far as Guatemala and as wide as Washington State to Binghamton, NY where fall was putting on foliage show for the group of 15 participants in the last IOIA Processor Training of 2013. This class had an interesting mix of qualifications, experiences and perspectives that resulted in many thought provoking questions. We also benefited from Karen Troxell’s presence (she was evaluating the class for IOIA and assisting as group leader).

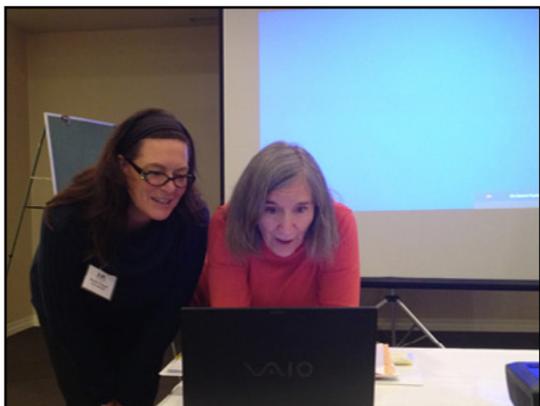


Left: Eileen Cullen, Wisconsin (left) and Sam Schaefer-Joel, Washington (right), and Seth Rosmarin, California (foreground) work through a group exercise.

Karen was generous in sharing her experiences while inspecting processors, had answers to some of the toughest questions, and was even convinced to teach one segment. We hope to see more of her!

On Thursday the class divided in half and took long rides, in limos because buses weren’t available, finally seeing some of the leaves. Both groups audited feed mills, which offered additional challenges with labels, food safety issues- and non-issues, and complicated trace backs. It was a pleasure to work with students who all participated. Each one added more depth to the course.

Trainers Karen and Sarah really enjoy teaching!



## Northeast Dairy Farms Host IOIA Livestock Training

Garry Lean, assisted by Margaret Scoles, trained 16 participants of the IOIA/NOFA-NY Basic Livestock Inspection course. Finding hosts for the field trip day is always a challenge in planning IOIA basic trainings. Certified operators who open their operations up to scrutiny to a group of novice inspectors make a huge and often under-recognized contribution to the IOIA training

program. There is no substitute for real-life experience. Time and time again, course participants cite the field trip experience as the most valuable part of the course.

One of the benefits of the Binghamton location was proximity to livestock field trips. An unusual luxury, there were more willing dairy field trip hosts than were needed. NOFA-NY identified the potential hosts and helped prepare the field trip documents. Field trips were both dairy operations - Josh Ford in Pennsylvania and Larry and Denise Moore in New York.

Participants practiced skills in calculating DMI from pasture, attempted feed audits, and rummaged through veterinary medicine cabinets. The Moores were field trip hosts extraordinaire. Denise prepared lunch for the whole group, including piping hot chicken soup from chicken she had raised and slaughtered. The trip concluded with a visit around the farm table - a welcome and memorable close to a chilly, wet day.



## Pressure Treated Lumber in a Post-CCA World: Are Any of the New Choices Suitable for Organic Production?

by Tony Fleming

We recently replaced the 14-year-old baseboards on our hoophouse. The infamous June 29, 2012 “derecho” storm front that ravaged a 600-mile-long swath from the southern Great Lakes to the mid-Atlantic inflicted heavy damage on the windward end of the structure, shredding the poly and taking several of the u-channels that attach the poly to the baseboard with it. A post-mortem evaluation revealed that the baseboards—plain untreated pine 2x6’s—had failed because of internal decay, perhaps not surprising considering the regular humidity and condensation in a hoophouse. We erected the hoophouse in 1998, when the options for exterior dimension lumber were largely limited to CCA-treated wood—a product with the potential to release arsenic into the soil, and thus prohibited in soil-contact situations by most organic standards at the time—or untreated commercial lumber, which typically lacks the durability and cost-effectiveness of pressure treated lumber. In the process of replacing the baseboards, however, we discovered that much had changed in the ensuing 14 years, with several new wood preservative formulations leading to a wider range of choices. This article summarizes our research and looks at some of these alternative products and wood preservatives through the lens of organic certification.

### Background

Humans have tried almost every method and material under the sun to extend the life of structural wood, beginning with the use of decay-resistant species—every continent with forests has several—which have been used for millennia (see sidebar

“Beyond Treated Wood”). Species such as ipe, mahogany, black locust, and redwood have dense wood that often has high concentrations of polyphenols that act as natural biocides and make the wood more hydrophobic. However, these species were often scarce, overexploited, and/or had other drawbacks that limited their widespread use as structural timbers and dimension lumber, thus spurring a centuries-old search for effective wood preservatives that continues today.

The concept of preserving wood by sealing it from the elements is hardly new and dates back thousands of years to the advent of wooden boats. The earliest wood preservatives tended to be readily available indigenous materials, such as olive oil, beeswax, shellac, mud, and tung oil that were applied to the surface of wood. While some of these materials may have weak pesticidal properties, they primarily act by forming a thin surficial coating intended to exclude moisture and decay-causing organisms. Most of these materials are typically not durable in harsh environments, eventually leading to wood decay unless frequently reapplied. Creosote—a byproduct of coal tar—became widely available during the industrial revolution, and was applied to many forms of exterior structural wood for decades; its current use is largely restricted to railroad ties, bridge pilings, and certain marine structures. Another surface-applied preservative, pentachlorophenol (“penta”) was first synthesized in 1930 and later became widely used in applications similar to creosote, particularly for utility poles, where it is still used today. While creosote and penta have superior preservative properties, both are toxic—EPA restricted their use decades ago—and both emit unpleasant, unhealthy odors that make them unsuited for residential and commercial applications.

Pressure treated lumber (PTL) originated in the 1940’s, spurred initially by the need for durable wood for marine applications, and subsequently adapted to a wide variety of structural lumber. PTL represented a major conceptual departure from the old methods, in that pressure vessels were used to infuse the entire board with aqueous or oil-based preservative solutions, instead of just treating the exterior. The preservatives used during the first few decades of this process varied somewhat in their makeup, but most had one element in common: arsenate, the inorganic form of arsenic, now listed as a probable human carcinogen. The most common arsenate-bearing formulation is chromated copper arsenate, or CCA, which was used for decades in everything from dimension lumber and plywood to bridge pilings. The growing use of this substance in outdoor playground equipment (and to a lesser extent, as treated timbers framing gardens and raised beds) eventually prompted questions about both the ability of the arsenate to migrate out of the treated wood and into soil, where it could be ingested by children (or taken up by plants), and exposure through direct contact of PTL with human skin. Inorganic arsenic is one of the most soluble and mobile metals. It is well known to migrate readily in soil and ground water, and these concerns ultimately led to a major EPA review (as with nearly all wood preservatives, CCA is registered as a pesticide). Studies conducted in response to these questions indicated that both exposure routes were possible.

Concerns over CCA-treated wood culminated in the early 2000’s, and in 2002, the industry and EPA reached a voluntary agreement to phase out CCA wood for most consumer and commercial applications by the end of 2003. CCA-treated wood continues to be available, but its use

is restricted mainly to large timbers used in marine, utility, industrial, and a few agricultural applications. In response to the CCA phase-out, the wood products industry introduced or expanded the use of different wood preservatives for the consumer-retail and commercial markets, an evolution that remains in flux as new products hit the market and others enter the R&D pipeline.

### **Pressure Treated Lumber and Organic Standards**

As noted earlier, even before the advent of the NOP, organic standards prohibited the use of PTL in direct contact with soil or livestock. This policy continues under the NOP, which references PTL or its components in several places, most directly in §205.206 (f):

***The producer must not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock.***

Other language relevant to this discussion includes the explicit prohibition of arsenic in §205.602.b, and restricted allowances in §205.601 for boric acid as a structural pesticide, sodium silicate as a flotation agent in post-harvest handling of tree fruit and fiber processing, and fixed copper (including copper oxide) for plant disease control, i.e., as a fungicide, and used in a manner that minimizes accumulation in the soil.

While clearly prohibiting CCA-treated lumber and allowing boric-acid based wood preservatives (contingent on avoiding contact with organic products), these sections of the rule also seem to open the door to the possibility of using copper-based and sodium silicate-based wood preservatives in an organic production system...or do they? As the rest of this discussion shows, the devil is in the details.

### **The Post-CCA Treated Wood Landscape**

Fixed copper has become the preservative of choice for most PTL sold for consumer-retail and commercial applications. Copper-based preservative formulations fall into three broad categories (identifiable by the capital letters on the label on the PTL product, and noted below):

1) Alkaline Copper Quaternary (ACQ), which is composed of copper oxide and didecyldimethyl ammonium chloride (DDAC)—a quaternary ammonia compound commonly used as a disinfectant in institutional settings, including food processing plants—in a 2:1 ratio. The copper oxide is the primary biocide, while the quat confers additional biocidal properties and acts as a carrier during the pressure treating process. Two variations are in use. ACQ-D uses ethanolamine as the carrier, while ACQ-B uses DDAC or a similar ammonia-based carrier that more readily penetrates dense western woods like Douglas fir.

2) Copper Azole (CA-B), composed of 96% copper oxide and 4% tebuconazole, one of many azoles—a class of synthetic aromatic compounds that includes several common agricultural and many pharmaceutical-grade topical fungicides. An earlier variation (CA-A) contains a subequal mix (49% each) of copper oxide and boric acid, but has largely been superseded by CA-B.

3) Micronized Copper Quaternary (MCQ) and micronized copper azole (MCA or  $\mu$ CA), a relatively new type of product in which the copper is ground to microparticles and suspended in water. The two main formulations are otherwise similar to ACQ and CA-B. For all intensive purposes, the micronized copper is a nanoparticle.

Disodium octaborate tetrahydrate (SBX/DOT; one of several sodium salts of boric acid) has been used as a wood preservative for decades. Several

PTL manufacturers offer borate-treated lumber, and I have seen it used in organic livestock housing. Generally speaking, the toxicity of all boric-acid-based pesticides is low, and because the amount used in these formulations is extremely small (only moderately greater than natural background levels), the EPA began exempting boric acid pesticides from tolerances on raw agricultural products in 1986, and it recently reclassified them as unrestricted pesticides. The biggest drawback of boric acid salts is their high solubility, which allows them to readily leach out of wood in wet or ground-contact situations, causing the preservative to lose its efficacy fairly quickly. As a result, independent authorities and most manufacturers of borate-based PTL recommend that it be used in locations not regularly exposed to the elements or directly to soil. SBX/DOT also is available in concentrated form to the general public, and is the only wood preservative scientifically documented to penetrate completely to the center of timbers when properly applied to the surface of existing wood structures.

Sodium silicate is a unique wood preservative that has received little press, possibly because it is a very small, niche product with limited distribution. TimberSIL™ is the only sodium-silicate based PTL; it is manufactured by first infusing lumber with liquid sodium silicate and then heating the boards at high temperatures that fuse the sodium silicate into an amorphous, inert glass. The resulting product is harder and stronger than wood, fire retardant, and virtually impervious to decay and insects because the wood fibers are encapsulated in glass. Among PTL, this product is unique in not being considered a pesticide by EPA; instead, it is the only PTL registered as a non-toxic barrier product under the exemption provided by 40CFR §152.10 (Title 40 governs the [see page 22]

registration of pesticides).

The above list is incomplete and includes only those PTL wood preservatives either widely available in the mass market or with obvious relevance to organic production. A host of other PTL products are also available or in the pipeline; some of these are intended for specialized applications, and many contain one or more prohibited synthetic pesticides (e.g., imidicloprid) that rule them out for organic production.

### Inspecting for Pressure Treated Lumber

Considering the tendency of untreated lumber to decay relatively rapidly in many common agricultural environments (fencing, livestock housing, exterior cladding and sills of outbuildings, high tunnels, etc), and the hassle of covering large areas of PTL with flashing or another material in contact situations, some producers will probably be tempted to consider the PTL choices listed above for new and replacement purposes. So how do they measure up to the NOP rule? And how can an inspector accurately determine which type of PTL may be present on site? Let's start with the second question.

First, let's clear up one common misconception right away: there is no definitive visual cue to confirm the presence of PTL. Many people commonly assume that PTL always appears green—or conversely, if lumber has a greenish tint, then it must be PTL. Wrong! It is true that copper does impart a greenish coloration to wood, but only when the PTL is fresh. After a couple of seasons of weathering, copper-based PTL tends to look very much like untreated lumber, even on the inside. Second, in some environments, a film of algae will grow on (and within the first few mm of) the surface of untreated wood, imparting a greenish tint that is impossible to visually distinguish from PTL.

There are a number of tests that could be performed in the field to identify the presence of copper, but most are impractical during a typical inspection. One of the simpler ones is to put a few drops of dilute sulfuric acid on the surface of the wood; if copper is present, it turns blue (copper sulfate). But how many inspectors want to fool with carrying around a bottle of sulfuric acid?

A more reasonable approach is to deal with new and replacement PTL just like any other input—by requiring the producer to present a label and/or MSDS. This is precisely how the boric acid PTL I encountered in a few inspections was handled; the producers submitted labels to their certifiers with the OSP. As noted earlier, each type of PTL has a specific alpha code, part of a standardized labeling system established by the American Wood Protection Association ([www.awpa.com](http://www.awpa.com)), identifying the wood preservative(s) present in the product. Requiring labels for PTL may seem like a moot point (many in the organic community take a jaundiced view of any type of PTL), but some of the PTL choices listed earlier do appear to comply with the NOP, while others clearly don't.

Based on §205.601 (e)(3), most boric acid-based PTL is clearly in the first category. It should be noted that some PTL preservatives combine SBX/DOT with other pesticides or synthetic polymers that may be prohibited, ergo, a label is still essential, as is evidence that the product has “no direct contact with organic food or crops” (note that the restriction does not include soil, an indirect exposure route).

Sodium silicate PTL also appears to comply with the rule...to a point. This substance is allowed under 205.601, but restricted to specific uses that do not include structural pest

management. Relevant considerations regarding sodium silicate include: it is synthetic; it is a component of some glass cookware; it is inert (in its solid form); and the EPA classifies it as a non-toxic barrier, and not as a pesticide. Sodium silicate PTL appears to be a worthy product that falls in a gray area. Stay tuned.

Among the types of PTL using fixed copper as the primary pesticide, copper azole and micronized copper can be ruled out. The former contains an *active* synthetic pesticide not on the national list (tebuconazole), while the latter uses nanotechnology, which has been strongly discouraged in a guidance document by the NOSB and is *de facto* prohibited.

The status of alkaline copper quaternary is more complicated. The copper itself is not the key issue, as copper oxide is explicitly allowed (with restrictions) as a fungicide applied directly to organic crops. Copper in its fixed form is poorly soluble and becomes largely immobile when bound to organic material and soil particles—this is exactly why concern and attendant restrictions exist about the buildup of copper in soils hosting crops treated with copper fungicides—and, as several studies of CCA have indicated, once inside the wood copper is less prone to leach out than chromium and arsenic. The real compliance question revolves around the “Q” in ACQ—quaternary ammonia, specifically didecylmethylammonium chloride (DDAC). “Quats”, as these compounds are commonly referred to, are not on the National List, and those of us who have done a lot of processing inspections are familiar with the complexities and challenges posed by facilities where quats are the principal sanitizer. These compounds are “sticky,” a quality that makes them effective biocides but also makes them difficult to remove from food-contact surfaces. However, that same

quality also appears to keep them in place inside PTL. From the EPA's reregistration eligibility decision on DDAC: "DDAC is immobile in soil", and "Information on the aqueous availability of DDAC from wood indicates that the use of DDAC as a wood preservative may result in minimal releases to the environment".

Further complicating the issue is the changing regulatory framework for inert ingredients in pesticides (see NOP guidance "Reassessed Inert Ingredients"). DDAC was not specifically listed in the EPA's "List 4 Inerts" (the method used by NOP to approve "inert" pesticide ingredients), nor on any of the other inert lists, which were last updated in 2004. However, DDAC does come up on EPA's Inertfinder tool (under its chemical systematic synonym 1-Decanaminium, N-decyl-, N,N-dimethyl-, chloride (1:1) and CAS# 7173-51-5); there, it is listed as "exempt from tolerances" for both food and non food use, the EPA status that is replacing, and is more or less equivalent to, being on List 4. DDAC also appears under 40CFR part 180.940(c), which identifies chemical substances "when used as ingredients in an antimicrobial pesticide formulation may be applied to food-processing equipment and utensils". It remains to be seen how the EPA's ongoing reassessment of inerts will ultimately play out viz the NOP, so it seems safe to say that we probably haven't heard the last word on ACQ treated lumber, but considering these ambiguities, ACQ must be considered as non-compliant for now.

### Conclusion

Since the 2003 phase out of CCA, pressure treated lumber destined for the consumer-retail and commercial marketplace has been manufactured using several alternative wood preservatives with vastly different chemical characteristics and varying degrees of compliance with the NOP

rule. Boric-acid-based PTL is the only one of these that unequivocally complies with the NOP, but two caveats need to be kept in mind: 1) some of these products contain prohibited polymers, carriers, and/or pesticides, which demands that a label or MSDS disclosing all ingredients be made available for review; and 2) the soluble nature of borate limits the use of these products to relatively dry locations largely shielded from the elements.

Sodium silicate-based PTL appears very promising in most respects, but the use of this substance is currently restricted to two unrelated applications by the NOP rule, thus casting doubt on its ability to comply with the rule as a structural pest management tool.

Copper oxide is explicitly allowed in the rule as a fungicide applied directly to organic crops, but two of the three main copper-oxide based PTL formulations are noncompliant because of the presence of prohibited or questionable secondary ingredients: copper azole contains the active ingredient tebuconazole, a synthetic fungicide not on the National List, while micronized copper consists of nanoparticles. The status of alkaline copper quaternary, on the other hand, is less clear cut: this formulation contains a large percentage of quaternary ammonia, which could be considered as either an active pesticide or an inert ingredient; the EPA assessment process for inert pesticide ingredients, upon which the NOP has depended for guidance, has undergone significant changes, whose ultimate impact on pesticide ingredients allowed in organic production remains unresolved.

The language of the NOP rule could be seen as emphasizing a prohibition on arsenate-treated lumber; this is understandable, as the rule was

formulated during the period when CCA was the dominant preservative in PTL. Now that CCA has largely disappeared from the consumer-retail marketplace, the rule may need to be updated or guidance issued to provide clarity on some of the newer alternatives that have subsequently emerged.

Based on the above conditions as well as practical experience, it seems plausible that inspectors will encounter organic producers who have used or are considering using some of these non-CCA PTL alternatives for new and replacement installations. As with many aspects of organic certification, inspectors need to keep an open mind and collect factual information to submit to the certifier. It is often rather problematic to visually distinguish treated and untreated lumber after installation, much less be able to identify the specific preservative formulation. The most reasonable solution to this challenge is to handle PTL much like other inputs in the certification process, by having the producer submit a label bearing the preservative code and a list of all other ingredients to the certifier (preferably as a query prior to the purchase and installation of the product).

As for our hoophouse: after considering the alternatives, we replaced the baseboards with ACQ-D PTL. Ours is strictly a personal garden and we haven't been certified for years, so the decision ended up being more about personal perception, risk tolerance, and practical considerations. We readily acknowledge that others might decide on a different course, and that certified producers would be strongly advised to consult with their certifiers before making such a decision. In our view, replacing baseboards on a large hoophouse is one of America's dirtiest jobs, a [see PTL page 24]

## References and Resources *(this listing is fragmentary: a bibliographic search of the items below, and particularly of the EPA website, turns up dozens of others - far more than can be listed here)*

Agency for Toxic Substances and Disease Registry, September 2004, Public Health Statement for Copper: <http://www.atsdr.cdc.gov/phs/phs.asp?id=204&tid=37> *Comprehensive toxicological and ecological profiles for copper*

American Wood Protection Association: [www.awpa.com](http://www.awpa.com) *Publishes research and sets international standards for pressure treated lumber and other preserved wood products*

National Center for Appropriate Technology, 2011, Pressure Treated Wood: Organic and Natural Alternatives, IP 362: [www.attra.ncat.org](http://www.attra.ncat.org)

National Organic Program Handbook, Guidance — Reassessed Inert Ingredients: <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5096778> *Outlines the changes occurring in the EPA's assessment procedures for inerts and the potential impact on how NOP will regulate inerts going forward*

National Organic Standards Board, Oct. 28, 2010, Guidance Document – Engineered Nanomaterials in Organic Production, Processing, and Packaging: <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5087795&acct=nosb>

National Pesticide Information Center, Specific Types of Wood Preservatives: <http://npic.orst.edu/ingred/ptype/treatwood/types.html> *Useful background information with links to dozens of other technical studies and documents from many agencies and organizations*

Timber Treatment Technologies: <http://www.timbersilwood.com/> *The website for TimberSIL details the manufacturing process, EPA regulation, and properties of sodium-silicate-based PTL*

USEPA Office of Prevention, Pesticides, and Toxic Substances, August 3, 2006, Reregistration Eligibility Decision for Aliphatic Alkyl Quaternaries (DDAC): Document EPA739-R-06-008, Case 3003. [http://www.epa.gov/oppsrrd1/REDs/ddac\\_red.pdf](http://www.epa.gov/oppsrrd1/REDs/ddac_red.pdf) *Provides a complete risk assessment, discussion of the toxicology, classification, and summary of uses of DDAC*

USEPA Office of Prevention, Pesticides, and Toxic Substances, September, 1993, Reregistration Eligibility Decision (RED) Fact Sheet for Boric Acid: Document EPA-738-F-93-006. <http://www.epa.gov/oppsrrd1/REDs/factsheets/0024fact.pdf> *A summary of the regulatory history of boric acid-based pesticides and their toxicological and ecological profiles*

USEPA Office of Prevention, Pesticides, and Toxic Substances, Pesticide Inert Ingredients: <http://www.epa.gov/oppr001/inerts/> *This site details the regulatory framework for pesticide inert ingredients, with links to RED's, fact sheets, and other documents. Provides a link to EPA's Inertfinder*

USEPA Office of Prevention, Pesticides, and Toxic Substances, Inertfinder Tool <http://iaspub.epa.gov/apex/pesticides/f?p=INERTFINDER:1:0::NO:1::> *Informational site provides up-to-date information in a user-friendly format on the regulatory status of inert pesticide ingredients, with links to the relevant citations in the CFR. Allows the user to find any inert ingredient by name, synonyms, or CAS#*

### PTL, from page 23

thankless, stoop-labor intensive, disruptive task that, given our advancing age, we hope not to have to repeat. ACQ has favorable toxicological and ecological profiles, and is readily available locally at a reasonable cost. And we set the baseboards at an elevation that largely eliminates direct contact with the soil.



*BOD members Silke Fuchshofen, New York, and Jennie Clifford, Pennsylvania, stop to chat in Binghamton at the NY trainings.*

## Beyond Pressure Treated Wood

Naturally decay resistant wood species can be substituted effectively for PTL in certain instances. One of the most durable outbuildings I know of is a century-old, open, lean-to structure constructed with black locust posts and cross beams, and chestnut siding. Of course, American chestnut is functionally extinct due to the blight, but black locust, osage orange, bald cypress, muscledwood, red cedar (both eastern and western), juniper, and redwood are alternatives. Of these, only western red cedar is widely available as dimension lumber, while the others tend to be regional specialties. Redwood is long lasting and is available in some places as salvaged wood in excellent condition, because it was originally cut from 100% heartwood—the most decay resistant part of the tree. Black locust, juniper, eastern red cedar, and osage orange are examples of regionally abundant species and make long-lasting posts, sills, and beams. Among decay-resistant North American woods, these are the main ones I'm aware of that seem to hold up for decades in ground-contact situations. We have another hoop house with baseboards made of western red cedar 2 x 6's, also about 15 years old. The boards not touching the ground are almost like new, but the ones in contact with soil are variously deteriorated. The point here is that untreated wood can be a perfectly viable and durable—not to mention economical—alternative when combined with creative and well-thought out construction methods, such as elevating sills, floor framing, and other low-lying structural members above the ground (or on a slab), using appropriate cladding and flashing, and paying attention to drainage details.

Boards made from recycled and/or virgin plastic can be found in a growing number of grower supply houses and in some retail outlets. While undoubtedly durable, plastic lumber has a fairly short track record and is less thoroughly studied than PTL, so the jury is still out on its long-term potential to leach prohibited substances into the soil, and under what conditions. A 1992 study, for example, found more than 70 synthetic compounds leaching from one kind of plastic lumber, while other studies have found little or none. Importantly, the NOP rule does not prohibit the use of plastic lumber in contact with crops or livestock, though one could reasonably ask whether the prohibition on PVC in plastic mulches and row covers might also apply to plastic lumber in soil- or crop-contact situations (some brands of plastic lumber are made from or may contain PVC). Despite these considerations, plastic lumber overall appears to comply with the NOP regulation, and offers a durable alternative to treated wood; moreover, it provides a viable market for post-consumer recycled plastics. The Plastic Lumber Trade Association (<http://www.plasticlumber.org/>) offers information about these products and contact information for manufacturers.

## Wild Farm Alliance and IOIA Collaborate on new Biodiversity Conservation Education Project

Over the past few months Wild Farm Alliance (WFA) and IOIA have pooled resources to work on a new project “Organic Biodiversity Conservation Education: Making the Most of New Certifier Requirements”. The recent addition of the natural resources standard in the National Organic Program’s checklist used to audit organic operations makes this a very timely project. This project will specifically provide organic professional training on requirements for soil, water, wetlands, woodlands, and wildlife as they relate to natural resources in the NOP. This new educational endeavor is designed to make biodiversity conservation a foundational principle in organic agriculture inspections.

WFA’s ten years of educating organic farmers and certifiers on strategies for implementing biodiversity conservation in ways that ecologically and economically benefit the farm makes them uniquely well-positioned to lead this project. Core collaborators working with WFA include Margaret Scoles, Barry Flamm, Lynn Coody, Harriet Behar and Jo Ann Baumgartner. Funding comes predominately from the Columbia Foundation.

Stage one of the project is designed to survey organic inspectors on how well biodiversity and natural resources assessment is being incorporated into inspections. The survey data will be used to inform both changes needed in training materials and audiences that may need and require additional training. Project team leaders will then work together to create and update educational materials and training opportunities for organic inspectors, certifiers, ag service providers and farmers.

How will this project impact inspectors and IOIA? At the conclusion of the project IOIA will have updated materials incorporated into IOIA webinars and basic training materials that are more relevant to the NOP standards for Biodiversity and Natural Resources. Participants in our educational courses will be better prepared, more efficient and know how to inspect to these requirements with confidence.

## Board of Directors Meetings – Minutes Highlights

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

### IOIA BOD Meeting July 18, 2013 - Conference Call

**Board Members Present:** Ib Hagsten (Chair), Isidor Yu, Pam Sullivan, Margaret Weigelt (Secretary), Garth Kahl, Stuart McMillan. Bill Stoneman joined at 7:30 PM and left at 9:15 PM. Also present: ED Margaret Scoles and Kathy Bowers, IOIA staff (for first 30 minutes).

**Report from the Chair, Visit at NOP:** Ib Hagsten described how he was able to meet informally on short notice with Miles McEvoy to chat about “Sound & Sensible”, Audit Training and how certifiers were adopting Sound & Sensible. FL speaking opportunity: Two of Ib’s papers were accepted for presentation to the American Society of Agronomy conference in Florida, November 6. He will present the advantages and benefits of organic agriculture in one talk and describe the urban agriculture movement in the other. On the same trip he will check out a possible venue for the 2015 AGM.

**Membership Survey:** Stuart McMillan presented survey structure, questions and background info, deadline dates. Consensus was to conduct survey entirely in digital format.

**Fundraising Committee-Fundraising Strategy:** Draft Gift Acceptance Policy discussed. Chris Kidwell, membership chair, was consulted and suggested we raise the amounts that define patron and sustainer levels. No objections.

**Treasurer’s Report:** 2nd Qtr Financial Reports and HRA follow-up. Pam Sullivan presented an overview. We were under the target for the first two quarters but projects that the second two quarters will be above projections and we will run close to our targeted budget estimates. Bill Stoneman moved to accept the Financial Reports. Garth Kahl seconded. Motion passed. HRA - Pam requested that the BOD accept the 3rd paid CPA firm’s recommendation to fix issues. Pam made motion that we vote to accept this recommendation. Motion passed.

**Set dates for BOD retreat(s) in 2014.** Consensus was reached to have a 2.5 day retreat Monday-Wednesday. Margaret Scoles suggested that a fall BOD retreat is of superb value. Garth suggested we wait until 4th quarter 2013 to make decision about having a second BOD retreat in 2014.

**Organic Week in Canada.** Proposed that IOIA sponsor Organic Week in Canada. Stuart approached Canadian Committee chair Bill Barkley and said he was supportive of the idea and being involved in Organic Week. Stuart wants to lobby that our sponsorship moneys be used for logo recognition in the Globe & Mail and a presence at Parliament Day in Ottawa. If we can’t get those benefits, we should reconsider. The \$1500 sponsorship level does not include recognition in the Globe & Mail. Bill Stoneman made motion to approve. Pam seconded. Discussion. Motion approved.

**IOIA Training Advisory.** Margaret asks for BOD opinion on whether IOIA should provide course participants with the correct answers or their graded tests. Discussion. Pam made motion that we NOT change the present policy. Garth seconded. No objections.

**ED Report.** Should IOIA sign on to the Seed Alliance letter? Consensus is to sign.

### IOIA BOD Meeting August 22, 2013 - Conference Call

**Board Members Present:** Ib Hagsten (Chair), Bill Stoneman, Garth Kahl, Margaret Weigelt (Secretary). Stuart McMillan joined at 7:20 PM. Bill left at 9:03 PM. Also present: Margaret Scoles, ED. Not able to attend: Pam Sullivan, Isidor Yu.

**Organic Week in Canada & Parliament Day:** Stuart McMillan reported that after much discussion with Margaret Scoles it was decided that participating in Organic Week at this time wasn’t the best use of IOIA resources as we weren’t able to negotiate logo recognition in the Globe and Mail insert. Instead, he applied to participate in Parliament Day, which cost \$30. Stuart reported that he had received email notification today that the COTA Parliament Day appears to have been cancelled.

**IRS 990 Return for 2012:** Treasurer Pam Sullivan recommends BOD approval. Bill Stoneman made a motion that we approve the 990 for submission to the IRS. Stuart McMillan seconded. Motion approved.

**Membership Dues for 2014 - Lifetime Membership:** Recommendations are as follows:

1. Change no categories of individual membership dues (Inspector, Supporting Individual, and Supporting Business).
2. Increase Patron to \$1000 and Sustainer to \$5000.
3. Increase Supporting Certification Agency dues to \$500 over 2 years, splitting it into two increases.

Stuart made a suggestion and Bill supported idea to do a financial analysis to determine impact of Lifetime Membership category. **Decision:** Garth made motion to accept the recommendation of the treasurer as described in the ED Report for the categories of dues. Motion carried by unanimous vote. It was suggested that the Lifetime Membership category be tabled for further analysis by the ED.

**Membership Survey:** Stuart McMillan (membership committee liaison) stated that he was pleased with response so far and will be reviewing the results in more depth. The comments will be used to prioritize actions needed to increase services to our membership.

**Food Safety:** It was recommended that the ED simply oversee the Primus/IOIA “train the trainers” program so as not to distract from the IOIA main mission. Margaret S/Bill will set up a conference call at Primus to discuss contractual and financial details, so that a recommendation can be made to BOD and BOD decision can be made at the next meeting.

**Sound and Sensible:** Comments were made regarding NOC, NOSB and ACA response documents. Should IOIA submit an official public comment for the August 27 NOP deadline regarding inspection time requirements? We discussed the widespread under-representation by inspectors of the actual time taken to write reports when invoicing. Garth recommended we address reviewer training and qualifications within the IOIA response/comments. Ib and Margaret will work on responses and comments to all parties that have compiled documents and make sure key items are brought in front of NOSB.

### IOIA BOD Meeting September 26, 2013 – Conference Call

**Board Members Present:** Ib Hagsten (Chair), Pam Sullivan, Stuart McMillan, Margaret Weigelt (Secretary), Bill Stoneman and Isidor Yu (until 8:30 PM). Garth Kahl joined at 8:30 PM. Also present: Margaret Scoles, ED.

Before the start of the meeting Stuart McMillan explained that he would not be attending Parliament Day as it had been canceled—Canada’s government legislative business had been prorogued (taken out of session).

**Report from the Chair:** Ib plans to represent IOIA at the November NOSB meeting in Kentucky and attend the ACA pre-meeting reception.

**Membership Survey:** As liaison to the Membership Committee, Stuart McMillan participated in a two hour conference call with committee members Chris Kidwell, Kelly Monaghan and Wendy Paulsen to analyze the survey results.

**Electronic Newsletter:** Bill Stoneman recommended we fully embrace the digital world. Bill made motion that we move to an electronic newsletter with the option, with renewal of membership, to select a paper copy at an additional cost, empowering the IOIA staff to determine cost. Stuart seconded. Motion passed unanimously.

**Food Safety:** Bill Stoneman summarized the PrimusLabs proposal to train IOIA trainers based on two conference calls he and Margaret Scoles had with PrimusLabs. IOIA would be a training authority that would train regional independent verification officers who would use the PrimusLabs system to do inspection work for organic or other agricultural entities, for themselves, or direct for PrimusLabs. This is not official GAP training, but a voluntary verification scheme for small producers below the FSMA limit. PrimusLabs would qualify IOIA as a trainer. **Decision:** Bill made motion to proceed cautiously in a relationship with PrimusLabs, and a training program administered through IOIA be established. Garth seconded. Vote was requested and motion passed unanimously.

## AquaBounty’s GMO Fish Operation Puts Wild Salmon, Environment at Risk

AquaBounty’s experimental production facility of genetically engineered salmon in Panama is missing a number of legally required permits and inspections, including a wastewater discharge permit, says an administrative claim filed November 21 in Panama by the environmental group [Centro de Incidencia Ambiental de Panama](#) (CIAM).

[Food & Water Watch](#) (FWW), [Center for Food Safety](#) (CFS) and [Friends of the Earth](#) (FOE) were part of an international coalition of groups who supported CIAM’s administrative claim by submitting a letter to Panamanian authorities, which raises serious ques-

tions regarding AquaBounty’s [ability to comply](#) with basic environmental regulations.

The coalition says the FDA is considering commercial approval of AquaBounty’s [genetically engineered salmon](#) based on a scenario in which AquaBounty would produce genetically engineered salmon eggs at a facility in Prince Edward Island, Canada. The eggs then would be shipped to the Panama facility to be grown to harvest. Fillets would then be shipped to American consumers. However, significant questions about the viability and legality of this plan continue to emerge. If approved, the fish would be the first genetically engineered food animal in the world. “FDA’s ineffective and inappropriate

regulatory regime has reached its [logical conclusion](#), as it appears that AquaBounty is essentially self-regulating in Panama,” said [Wenonah Hauter](#), FWW executive director. “If and when FDA finally approves genetically engineered salmon and new production facilities open up around the world, we expect this scenario to play out again and again.”

The CIAM complaint comes on the heels of several other reports of major problems at AquaBounty’s Panamanian facility, including the company reporting “lost” genetically engineered salmon, which resulted from the region’s notoriously severe weather. The area around AquaBounty’s facility experiences routine, destructive flooding.

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## Keep IOIA Strong - Lend Your Strength And Get Involved!

### 2014 Calendar

**Dec. 12-14, 2013, 2013** Acres U.S.A. Conference, Springfield, Illinois. [www.acresusa.com](http://www.acresusa.com)

**Jan 11, 2014** [27th Annual NOFA/Mass Winter Conference](http://www.nofamass.org), Worcester State University, Worcester, MA. [www.nofamass.org](http://www.nofamass.org)

**Jan 15 – 18** SSAWG Winter Conference, Mobile, AL. [www.ssawg.org](http://www.ssawg.org)

**Jan 22 – 25** EcoFarm Conference, Asilomar, CA. <http://ecofarm2014.org/>  
Come hear presenters Maria Rodale, David Bronner, Grant Lundberg, Temple Grandin, Kathleen Merrigan, Tom Willey, Jyoti Stephens and others. Early registration deadline is December 7.

**Jan 22 – 23** Sustainable Foods Summit, San Francisco, CA. [www.sustainablefoodssummit.com/index.htm](http://www.sustainablefoodssummit.com/index.htm)

**Jan 24- 26** NOFANY Winter Conference, Saratoga Springs, NY. [www.nofany.org](http://www.nofany.org)

**Jan 30 – Feb 1** 7th Organic Seed Growers Conference. Corvallis, Oregon. This Conference brings together hundreds of farmers, plant breeders, researchers, university extension, certifiers, food companies, seed production and distribution companies, and other organic stakeholders in two days of presentations, panel discussions, and networking events. There are also farm visits and short courses prior to the two-day conference. [http://seedalliance.org/events/organic\\_seed\\_growers\\_conference](http://seedalliance.org/events/organic_seed_growers_conference)

**Jan 31** Advanced Inspector training in conjunction with Guelph Conference, see page 5.

**Jan 30 – Feb 2** 33rd Annual Guelph Organic Conference & Expo, Guelph University Centre. [www.guelphorganicconf.ca](http://www.guelphorganicconf.ca)

**Feb 27 – March 1** MOSES Organic Farming Conference – 25th Anniversary. La Crosse, WI. [www.mosesorganic.org](http://www.mosesorganic.org)

**March 6** [Natural Products Expo West](http://www.expowest.com/ew14/public/enter.aspx), Anaheim, CA. <http://www.expowest.com/ew14/public/enter.aspx>

**April 28** NOSB meeting, San Antonio, Texas. Anyone who signed up to give an oral public comment for the fall 2013 meeting will need to sign up again to make an oral public comment in the spring.

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***Please see page 3 for the current list of IOIA on-site trainings***  
***Please see page 5 for the current list of IOIA Webinars***