

Inspectors' Report

VOLUME 32 - NUMBER 1 - WINTER/SPRING 2023

Strengthening Organic Integrity - What it means for inspectors

This article will give a high-level overview of the entire rule, while digging deeper into what matters most for inspectors.

On January 18, just five days before the IOIA Annual Meeting in New Orleans, the final SOE Rule was published. This was the largest change to the NOP rule since the Organic Foods Production Act was published in 1990 - to be fully

implemented in 14 months (by March 19, 2024).

Operations can't be issued noncompliances for anything that was not in the former rule until March 19, 2024. Both versions are available in the e-CFR (look for the "previous versions" tab). Fortunately, inspectors don't issue Notices of Noncompliance; certifiers do. We just cite Issues of Concern. Confused yet about which rule to cite from? There are many resources to help

the busy inspector navigate what this new rule means and what is important for us. A big share of the content applies more to other certifier staff than inspectors.

SOE is an attempt to increase oversight of certifiers and reduce fraud. Many aspects of SOE came from the 2018 US Congress Farm Bill and were sparked by some very high-profile fraud cases. An especially important update addresses qualifications and expectation for continuing education for inspectors and reviewers. Other aspects simply clarified or corrected language or codified what we already do. For example, unannounced Inspections on at least 5% of operations was already a Certifier Instruction.



Now it is in the rule. A helpful update is codifying the ability of certifiers to share confidential information with each other. "Certifying agents must provide information to other certifying agents to ensure organic integrity or to

> enforce organic regulations, including to verify supply chain integrity, authenticate the organic status of certified products, and conduct investigations;" 205.501(a)(13).

> **Exemptions:** In 205.101, we now have only (a) Exemptions now with no (b) for Exclusions. This rule dramatically reduces the number of operations that can sell organic products without being certified. Beyond eliminating most exemp-

tions, it expands the definition of "handler to include buying, selling, trading" which further limits uncertified operations. A definition of "Organic importer" was added. Shipping and handling operations that only handle products in tamper-evident packaging, customs brokers, and operations that arrange for shipping (but do not otherwise handle) remain exempt. This is a major change but applies mostly to certifiers, rather than inspectors, unless perhaps we discover an uncertified handler during inspection.

Personnel Qualifications and Training including Inspectors: Note* Requirements for reviewers are similar, but without the minimum number of hours of training relevant to inspection. 205.501(a)(4) requires See SOE, page 4

Notes from the Chair by Beth Dominick

Spring is underway here in the Pacific Northwest, but winter doesn't want to leave just yet. The apple trees are blooming, the late winter storms and rain keep coming. The seeds saved last fall, were carefully planted and now bursting forth their first new leaves. I am glad to welcome you to the spring newsletter with this, my first Notes from the Chair.

I am both proud and humbled to be serving IOIA as the chair of the board of directors this year. It is a wonderful experience to serve on the IOIA Board of Directors, and to work with Margaret and the dedicated IOIA staff. Our annual general meeting in New Orleans was a wonderful celebration of 30 years of IOIA and a celebration of the efforts of inspectors and certifiers.

IOIA has been busy preparing for this busy season. It's been one year since the Origin of Livestock (OOL) See Notes, p 4

WINTER/Spring 2023

Welcome New Members	WEBINAR Training Schedule for details & to register go to our <u>website</u>		
Inspectors Amy Bacigalupo, Montevideo, MN Thomas Hershberger, New Philadel- phia, OH Ellen Jackson, New Milford, PA Dan Kaatz, Viroqua, WI	May 11 & 18 200 Level Processing In/Out Balances, Traceability & Recipe Verification under NOP & COR. 9:00 a.m 11:00 a.m. (Pacific) Two 2 hour sessions. Trainer: Kelly A. Monaghan		
Andrew Llewelyn-Jones, Vernon, BC, Canada Sean Manley, Newmarket, ON, Canada Daniel Tinsley, Decatur, GA	May 30 & June 2 100 Level NOP Crop Standards 9:00 a.m 12:00 p.m. (Pacific) Two 3 hour sessions. Trainer: Garry Lean		
New Supporting Individuals Gracelyn Abel, Kalispell, MT Meia Alsup, San Francisco, CA Julie Bernier, Millet, AB, Canada William Bruton, Mt. Gilead, NC Thomas Campbell, Rutledge, MO	July 25 & 28 100 Level NOP Crop Standards 9:00 a.m 12:00 p.m. (Pacific) Two 3 hour sessions. Trainer: Garry Lean		
Joannée DeBruhl, Battle Creek, MI Katja Hernandez, Roseville, MN Michael Kelly, Portland, OR Karen (Lauren) Lane, Pleasant Prairie, WI	September 19 & 22 100 Level IOIA/COTA COR Processing Standards 9:00 a.m 12:00 p.m. (Pacific) Two 3 hour sessions. Trainer: Kelly Monaghan		
Amanda Rose Newton, Melbourne, FL Fay Pemberton, Austin, TX Aaron Richardson, Chicago, IL Sofia Skirpa, Missoula, MT Jennifer Whaley, Brook, IN	September 29 - Back by Popular Demand! 300 Level Organic Cosmetics 9:00 a.m 11:00 a.m. and 12:00 p.m 2 p.m. (Pacific) Two 2 hour sessions with a one hour break. Presented by Gay Timmons, Oh Oh Organics		
Accreditation Deadline October 1 To apply or renew. Click here for info.	November 29 & December 6 200 Level Processing In/Out Balances, Traceability & Recipe Verification under NOP & COR 9:00 a.m 11:00 a.m. (Pacific) Two 2 hour sessions. Trainer: Kelly Monaghan		
— Chair — Beth Dominick — Vice Chair — Janine Gibson — Treasurer — Allan Benjamin	Webinar Discount Reminder: All inspector members are entitled to take 50% off any one webinar during 2023		
— Secretary — Kate Newkirk — Executive Committee at Large —	Self-Paced Learning Courses		
Kathe Purvis — Director — Terrance 'T' Layhew — Director — Margarito Cal	Canadian Organic Regime - COR Series Courses 1 & 2 each take approximately 3 hours to complete. Inspector members price: US\$150 each. #1 Our Organic Certification System - The Regulation #2 COR Crop Production Standards NEW and NOW AVAILABLE #3 COR Livestock Production Standards		

The Inspectors' Report is the newsletter of International Organic Inspectors Association. IOIA is a 501 (c)(3) educational organization. Our mission is to address issues and concerns relevant to organic inspectors, to provide quality inspector training and to promote integrity and consistency in the organic certification process. Editor: <u>Diane Cooner</u>

200 level IOIA/American Grassfed Association Grassfed Dairy

Remote Inspection Training Free to inspector members; All others \$200.

Note: This is a 10-12 hour course, Member Price US\$275

Available in English Tambien disponible en español.

Member cost \$300 - all others \$325 See our website to sign up.

Onsite Basic Training

May 22 - 26 - Basic Processing Inspection Training - Mount Vernon, Washington

The 4 ½ -day Basic Inspection Training follows IOIA's curriculum requirements.

The course begins at 8:00 a.m. on Monday, May 22 2023, and will conclude at 12:00 p.m. (noon) on Friday, May 26, 2023. This course is based on the USDA National Organic Program regulations.

Acceptance Criteria: A minimum of 1-year training and/or 1-year experience in food processing. Knowledge of basic accounting and ability to solve mathematical problems. The 100-level NOP Processing Standards webinar training (6 hours). If you have already completed this webinar, you are not required to retake.

Please see our website for application and registration information.

Livestock Apprenticeship Intensive – La Farge, WI

July 24 - 29 IOIA/FAFO Livestock Apprenticeship Intensive

Course size is limited to five participants and the course is six days long. Trainers/mentors will be Garth Kahl and Nathaniel Powell-Palm.

This training will be provided at no cost to the selected apprentices, including meals and lodging during the training. Apprentices will be expected to pay their own travel costs to/from the training. Deadline to apply June 12 - <u>see the IOIA site for details</u>.



Live Online Basic Courses - <u>see the IOIA site for details</u>

May 15 - 19 COR - Basic Crop Inspection Training - Course is full.

June 12 - 16 NOP Basic Crop Inspection Training - Course is full.

June 19 - 23 & June 26 - 30 - COR - Basic Organic Livestock Inspection Training The 10 -day Basic Organic Livestock Inspection Training follows IOIA's curriculum requirements. Deadline to Register and Apply is Monday, May 15, 2023.

October 16 - 20 - COR Basic Processing Inspection Training

The 4 ½ -day Basic Organic Processing Inspection Training follows IOIA's curriculum requirements.

Live Online Spanish Language Courses

IOIA is pleased to be developing two upcoming courses in Spanish language - Basic Crop Inspection Training, cosponsored with EcoLogica, Costa Rica; and Basic Processing Inspection Training, cosponsored with AgriVita, Luis Brenes. For more information about **the crop course**, contact Nandayure Studt, <u>nstudt@eco-logica.com</u>. If you are interested in the processing course, please contact <u>IOIA</u>.

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

Notes from the Chair, from page 1

Final Rule and only a few weeks since Strengthening Organic Enforcement (SOE) was published. These are wins for organic farmers, organic dairy producers and for all who care about integrity in the organic sector.

IOIA board of directors and staff are doing our work guided by our priorities and initiatives from our IOIA Strategic Plan. (1) Design IOIA training to evolve with the sector, expand capacity, and grow skills for organic inspectors and other stakeholders (2) Advocate for the inspector profession while engaging stakeholders to increase membership benefits and grow the community (3) Implement a clear and structured operations protocol that holds IOIA accountable for continuous improvement within the organization, and advances the IOAI mission.

As you enjoy reading this Spring 2023 edition of the newsletter I encourage you to apply to participate in the ACA-IOIA 2023 Organic Inspector Mentor Cohort. This project is funded by a cooperative agreement between ACA and the USDA. Mentors will be responsible for providing guidance, support and training to new inspectors as they gain experience in the field. See page 10 of this issue for more details.

There is much to be positive about! Many thanks to all of the IOIA members, committee members, and dedicated leadership team working together to promote consistency and integrity in the organic certification process.



Beth Dominick

SOE, from page 1

Certifying agents must demonstrate that all inspectors and certification review staff, including staff, volunteers, and contractors, have the relevant knowledge, skills, and experience required to inspect operations of the scope and complexity assigned and to evaluate compliance with the applicable regulations of this part.

(A) Certifying agents must demonstrate that inspectors continuously maintain adequate knowledge and skills about the current USDA organic standards, production and handling practices, certification and inspection, import and/or export requirements, traceability audits, mass-balance audits, written and oral communication skills, sample collection, investigation techniques, and preparation of technically accurate inspection documents.

(B) All inspectors must demonstrate successful completion of training that is relevant to inspection. Inspectors with less than one year of inspection experience must complete at least 50 hours of training within their first year and prior to performing inspections independently. Inspectors with one or more years of inspection experience must annually complete at least 10 hours of training if inspecting one area of operation (as defined at § 205.2) and an additional 5 hours of training for each additional area of operation inspected.

(C) Certifying agents must demonstrate that inspectors have a minimum of 2,000 hours of experience relevant to the scope and complexity of operations they will inspect before assigning initial inspection responsibilities.

Certifying agents must maintain current training requirements, training procedures, and training records for all inspectors and certification review personnel.

Personnel evaluation, witness inspections: Certifiers must: Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site conduct inspections, certification review, or implement inspections, review certification documents... and (i) Certifying agents must ensure that "each inspector is evaluated while performing an inspection at least once every three years, or more frequently if warranted. Inspectors with less than three years of inspection experience must undergo a witness inspection annually. Witness inspections must be performed by certifying agent personnel who are qualified to evaluate inspectors."

Recordkeeping: In 205.103, the requirement for recordkeeping is expanded to include "records must span the time of purchase or acquisition, through production, to sale or transport and be traceable back to the last certified operation;" Not a big change to what we have already been doing.

Organic Plan: 205.201(a)(3) was expanded to include "a description of the monitoring practices and procedures to verify suppliers in the supply chain and organic status of agricultural products received, and to prevent organic fraud, as appropriate to the certified operation's activities, scope, and complexity;" Up until now, we have been verifying back to the last certified operation. This makes the certified operator more accountable. **SOE continued on page 21**

Notes from the Executive Director by Margaret Scoles

t is spring! The biggest chokecherry tree in Broadus, right outside our office, is preparing to bloom. The peas and early crops are in the ground in the garden. Cecilia and I have started dozens of small tomatoes, peppers, and Brassicas in my office under lights 24/7 to make up for lost time. They are clamoring to be re-potted. But not until this issue is out! They are going to have to survive a little longer with a shot of compost tea (OK, well "aged manure from the ranch tea", not NOP compliant compost tea). This issue was delayed by my much-delayed return from New Orleans.

Inspector Credentialing – This was a hot topic at the AGM in New Orleans and an important one. Chuck Mitchell, outgoing board member, spoke to credentialing. He pointed out that SOE's stronger and more prescriptive requirements for inspector qualifications, training, continuing education, and evaluation make this the perfect time to fast-track a credentialing program that is consistent with NOP. Several members who were in attendance proposed a working group. That group (a fairly large group of about a dozen) started meeting soon after. The group meets about every two weeks online. Ellie Hudson,



Kelly Korman of CCOF, selfie with Margaret in her 'Queen of the Parade' costume, enjoying the Organic Parade in New Orleans, January 2023.

under part-time contract to IOIA, is IOIA's designated representative to the working group. She brings expertise and experience in personnel credentialing, one of the primary reasons she joined us at IOIA in 2021 before going on to become Executive Director of ACA. I attend when able. The group is currently organizing resources and preparing to invite in potential partners and collaborators which could include ACA and the Alliance for Organic Integrity as well as others. So much work has been done by IOIA already in the past. Kudos to this self-organized group of IOIA volunteers!



IOIA has a new Webinar Coordinator - We were fortunate to have **Michele Schahczenski** join our team in February. Michele grew up in Montana and is currently living in Salt Lake City. Her position is half-time, and she works remotely. She took the IOIA Basic Crop Inspection Training online last year and is just now apprenticing and accepting her first inspection assignments. Her inspection work will hopefully complement her IOIA work. She speaks some Spanish (a great asset in this position), she served in the Peace Corps in Paraguay, and her Master's thesis was: "Going Organic: Paraguayan Campesinos and the Organic Movement".

More webinars via the OMRI/IOIA Partnership coming – Michele and I met with Doug Currier of OMRI and brainstormed how to deliver more training offerings to reach more inspectors. Watch the summer issue for a robust offering of webinars, including new 100-level Crop and Processing Inputs webinars!

Mentorship/Apprenticeship – see page 10 If this went by you. Perhaps you thought you were just too busy to redact two reports to render them anonymous. Or maybe you weren't sure you could readily obtain two letters of reference from certifiers about the quality of your mentorship. But please, consider submitting an application to this project. We need mentors and we need apprentices! **Click here to learn more and apply as a mentor**. The most important outcome is not just bringing on another dozen or so inspectors. Yes, that's Important. IOIA continues to train well-qualified new potential inspectors who find it challenging to access mentors. But even more important, this project will pair apprentices and inspectors to develop a Mentor Job Task Analysis – a critical step in developing a Mentorship Program that will be recognized by the Department of Labor and hopefully gain access to public funding. Still not sure if this is for you? PLEASE call me.

And finally, a deep, heartfelt thank you from my husband and me for All of the amazing support when he experienced a medical emergency in New Orleans. We were gone for 2 months, half of that in the hospital. Thank you to Rachel Cherry Myers, who with the help of Diane Cooner to get the word out, and with the full support of the IOIA board, started a GoFundMe account that raised over \$11,000. Much of this came from you, the IOIA members. Other IOIA members donated hotel points. This all defrayed most of our out-of-pocket expenses. Bob is largely recovered. We were in New Orleans for a month, took the train to Tucson in a wheelchair sleeping car with help from our son, and then further recuperated with Bob's family and great doctors there, before flying home. Great to be home. Happy Spring!



Sector News

Spring NOSB Meeting Report

These items were excerpted and abbreviated from OTA's Spring 2023 National Organic Standards Board Meeting Report.

The Fall 2023 NOSB Meeting is scheduled for October 24 - 26 in Providence, RI. The public comment webinars are scheduled for October 17 and October 19 from Noon -5:00 pm Eastern. The Work Agenda topics are posted on <u>Regulations</u>. gov and will be available on the NOSB's website later this month.

PROPOSALS: 2 proposals were considered by NOSB and both PASSED. NOSB proposals are referred to USDA for approval and implementation and do not become effective until accepted by the USDA and implemented through rulemaking.

- Organic is Climate Smart Passed (14 yes, 1 absent): Recommendation articulating why organic farming as "climate-smart" and certified operations should be automatically eligible for all climate-smart funding and other applicable USDA programs. Nate Powell-Palm explained that the proposal does not pretend nor intend to be 100% complete, but rather is solid start that provides USDA with timely information to secure organic as a climate-smart form of agriculture.NOSB will continue to get more work agenda items to capture all that is relevant to organic and climate smart.
- Ion Exchange Filtration Resins Passed (12 yes, 1 no, 1 abstention, 1 absent): Recommendation that resins used in Ion exchange filtration do not need to be on the National List and NOP provide instruction to certifiers for verifying compliance. The majority of NOSB members agreed that ion exchange resins do not meet the definition of an 'ingredient' or a 'processing aid' and therefore do not need to be on the National List. That said, careful consideration was given to the fact that resins are food contact substances and could be a source of contamination if not handled properly.

Activist Ronnie Cummins

Ronnie Cummins, co-founder and international director of the Organic Consumers Association and its Mexican affiliate Via Organica, and a longtime organic advocate, passed away April 26 from complications of bone and lymph cancer at age 77. Author of *Genetically Engineered Food: A Self-Defense Guide for Consumers* and other publications, he is survived by his wife Rose and son Adrian.

Canada Moves Forward Without Mandatory Disclosure of Gene Edited Seeds: Decision Disappoints Organic Sector

OTTAWA, ON, On May 3, 2023 Honourable Minister Marie-Claude Bibeau announced a decision to allow new genetically engineered (GE) seeds to be released in Canada without health or safety assessments and only voluntary disclosure. This puts the organic sector, which prohibits all forms of genetic engineering, at significant risk.

The Canadian organic sector is very disappointed in this decision to move ahead with <u>updating the guidance</u> related to the Seeds Regulations, without requiring the reporting of all gene edited seeds. Mandatory disclosure is considered a minimum to provide the transparency and traceability needed for organic businesses and consumers. This has been consistently communicated by the organic sector to government.

Organic certifications are the foundation of global organic trade. The Canadian organic sector is a \$9.35 billion industry that is globally recognized and has equivalency arrangements with 33 countries to facilitate trade. The processes that have been in place with Health Canada and the Canadian Food Inspection Agency (CFIA) before the new guidance was proposed help ensure that the organic supply chain is free from genetic engineering will no longer be employed for new genomic techniques, deemed to be non-novel by the Federal Government.

"Our simple ask is to have a registry of all gene edited products that is mandatory for seed developers and that is overseen by government. Today's announcement from the government is a step backwards given the government's transparency commitments," states executive director, Tia Loftsgard.

"The organic sector takes contamination very seriously. The need for 100% capture of all gene edited seeds is not a hypothetical situation," continues Loftsgard. In 2018, GMO wheat was discovered in Alberta and shut down all Canadian wheat exports to Japan and South Korea for 1.5 months. This highlights the risk not only to organics, but to all forms of agriculture in Canada should there be no mandatory transparency of new genetically engineered products moving forward.

News from Canada

Gene-edited Seed, continued from page 6 Industry-Government Technical Committee

The Canada Organic Trade Association (COTA), along with other organic partners, participated in a Technical Committee organized by Agriculture and Agri-food Canada, to outline the organic perspective on suitable solutions to protect the organic sector in light of Minister Bibeau's public commitment to protect organic certifications and trade.

The process was not as promising as the organic sector hoped. From the onset, the aggressive timeline was not conducive to finding a suitable solution to protect organic certifications. The Technical Committee quickly limited the scope of the work to focus primarily on a voluntary database managed by the seed industry, which the organic participants highlighted as problematic from the beginning. The concepts of "voluntary" and "transparency" are fundamentally at odds. Additional measures need to betaken to improve the basic transparency tools that are to be put in place.

The recommendations in the <u>Report</u> move in the right direction but is a far cry from meeting the needs of the organic sector related to transparency. Further improvements to the recommendations, including regulatory options, must be further explored and implemented to ensure that transparency is maintained for gene edited food, seeds, and feed throughout the various stages of the supply chain from breeding to processing. *COTA Press Release*, *5.4.2023*

NEW Basic Online COR Courses Now Available!

We are pleased to offer Basic Online Courses for the Canadian Organic Regime to all three scopes in 2023: Crop, Processing, and Livestock. See page 3 or our website for full details.

Thank you Tomás!

Organic Food Conferences Canada, a corporation that was formed by Tomás Nimmo, longtime manager of the Guelph Conference, has been dissolved and assets distributed. IOIA received CAD\$4000 to establish a fund to support more Canadian inspectors to attend IOIA training.

Under Development....

IOIA members have proposed advanced training in BC for this fall, in coordination with 2023 BC Organic Conference, November 7 - 9, in Penticton.

NOW AVAILABLE Self-paced course: COR Livestock Production Standards Note: This is a 10-12 hour course, Member Price US\$270 See page 3 for more info

Guelph Recap by Bill Barkley



IOIA organized an inspector gathering on Saturday evening 27 January with about 25 in attendance.

The 2023 Guelph Organic conference in January was a great success. It was good to see friendly organic faces again!

Tom and Bill attended the opening meal event and the keynote address by Paul Holmbeck.

Tom Cassan manned our booth diligently for both Saturday and Sunday in the trade show.

Bill went to the COTA Saturday event and the traders meeting on Sunday morning.

There was considerable participation from QAI, ProCert and CSI inspectors.



Tom Cassan and Bill Barkley at the IOIA booth. At its peak we had a small line-up at the booth!

Committee News

IOIA Policy Comment Committee

IOIA Salutes these member volunteers and Facilitator extraordinaire, Rachel Cherry Myers. Committee members are Kate Newkirk (Chair); Brian Baker, Allan Benjamin, Luis Brenes, Garth Kahl, Leonard Pollara, Margaret Anne Weigelt. Board Liaison: Terrance Layhew.

In 2022, this hardworking committee prepared comprehensive comments to both Spring and Fall meetings of the National Organic Standards Board (NOSB), an Advanced Notice of Proposed Rulemaking on Inerts in Pesticides for Organic Production, Proposed Rule on Organic Livestock and Poultry Standards, and a request for comments from the NOP to the community to prioritize the long list of NOSB recommendations for topics other than materials. Rachel also signed IOIA up for public input slot to the fall 2022 and



spring 2023 NOSB meetings. The spring 2023 comments focused on a Discussion Document "Oversight Improvements to Deter Fraud: Consistent Location Identification". We commented in writing and on the public input webinar.

The Committee uses the IOIA decision tree to decide when to comment. Comments are developed primarily when issues have direct impact on inspectors. All Policy Comments and Position Statements are posted on the IOIA website. See https://www.ioia.net/organic-policy/ Watch for an upcoming podcast on how inspectors can influence the outcomes of the 2023 Farm Bill, hosted by Terrance.

IOIA Asia Pacific Committee

This committee self-organized in 2019 from among the IOIA members to expand training opportunities in the region and to ensure that training is relevant and accessible. Chair: Mutsumi Sakuyoshi (Japan). Committee members are Kathe Purvis (Australia), Vitoon Panyakul (Thailand), Jim Pierce (Fiji), Isidor Yu (South Korea), Sandeep Bhargava (India), and Maheswar Ghimire (Nepal). BOD Liaison: Margarito Cal.

In January 2022, the group delivered a free webinar to more than a hundred participants on the topic of Grower Group Inspection, followed by two live online grower group inspection trainings with a registration fee. They started out 2023 with another free webinar, Organic Certification and Lab Test, on January 17, addressing the challenges for organic producers under regulations with zero residue tolerances. They developed a Position Paper on this topic which is being presented to the IOIA board with a request for endorsement.

The committee is currently developing marketing material to promote the training services that they are prepared to deliver in the Asia Pacific region. Training can be delivered online or face to face and customized to specific requirements.

Services include:

- Basic Inspection Training
- Grower Group Training can be geared for external inspectors, ICS/internal inspectors, PGS Groups, or Grower groups seeking to establish or improve their systems
- Organic Certification Standards education USDA NOP, NPOP, or EU
- Audit Trail Training Traceback and mass balance training, suitable for certification staff, external auditors, ICS staff and external auditors
- Biodiversity/Sustainability Requirements for Organic, suitable for certification staff, external auditors, ICS staff and external auditors

"In January 2020, Grower Group Inspection training was hosted by APC for the first time. Since then, we have worked hard to standardize the training so that it can be held in each region. The goal was to prepare materials that would allow the training to be rolled out locally, based on differences in language and affordability of participation costs by country or region. Since then, two online trainings have been held, and it is expected that more will be held in various regions as updates are made. The point of our activities is to understand each other's various regional and national differences, as well as common challenges and training, and to work together with experienced inspectors to embody the IOIA mission."



Mutsumi Sakuyoshi, APC Chair

Member Benefits: TOS, Podcast, Town Hall, Coffee and Forum

Don't Miss This Deal! - The Organic Standard - 90% off Annual Subscription!

The Alliance for Organic Integrity and Biocertificacion SL (BSL) successfully relaunched the highly respected *The Organic Standard* journal at Biofach 2023 in Nuremberg, Germany. *The Organic Standard* provides the organic community with much needed news, analysis, insight and guidance on global organic regulatory, standards and control issues.

As a valued Partner of The Alliance for Organic Integrity, IOIA is very pleased to offer **Inspector and Supporting Individual members** a 1-year discounted subscription rate of USD\$30 each (usual cost \$270/year) for 6 issues per year.*

The April issue, which was sent to all IOIA members, includes the cover article on EU and NOP regulatory changes in Grower Group Inspection & Certification by Gabriela Soto, IOIA member, and Michael Sligh of the Alliance; Fair Trade and Organic in one seal; detail on Strengthening Organic Enforcement by Marni Karlin; OMRI on why NOP should add accreditation of Materials Review Organizations; Tim Marshall on Australia; rice in the Philippines; and an exploration of residues and organic fraud by the Anti-Fraud Initiative team Beate Huber, Bo van Elzakker, Tim Nizet, and Jochen Neuendorff. Just how useful are sampling and residue tests in ensuring organic integrity? And much more. Part II of the Grower Group and SOE articles will be continued in the June issue.

The Alliance for Organic Integrity is thrilled to step in and support the re-launch, with financial, management and administrative support to ensure the publication can endure and thrive. The Organic Standard aims to fill the gap, providing a resource that reports on timely issues affecting organic integrity and the organic control community, providing the information needed to help Strengthen Organic Assurance, Globally. Learn more about The Alliance for Organic Integrity at <u>www.aoi.bio</u>.

Francis Blake, President of The Alliance, said "as the burgeoning organic market continues to break new ground, we're so pleased to have relaunched The Organic Standard, to support consistent, rigorous and effective organic standards, certification and regulation across the globe, for the benefit of the organic community and of consumers".

*Individual members agree the subscription is for their personal use only and this should not be circulated to others or within organizations. Our business and organization members are encouraged to purchase a subscription via The Organic Standard website <u>www.organicstandard.com</u>.

<u>Please contact us via this Google Link</u> to sign up before 15th June 2023 to receive this offer. We will invoice you for USD\$30.

New Podcast Coming Soon:

About the US Farm Bill

We'll be sending out an announcement soon, watch your email for the link, or find it on our website.

Coffee with IOIA

A regular monthly gathering of anyone and everyone interested in talking about organic - inspection, certification, materials, whatever is on your mind!

Town Hall May 18 - Deep Dive on The Organic Standard

Panel discussion on the relaunch of IOIA's newest member benefit!

Remember -Coffee with IOIA is Not Recorded!



IOIA Forum

Lively discussions this spring covered topics such as palm oil plant cleaning, more on sodium nitrate, and dealing with Intact forms offline. If you are an inspector member and aren't using the IOIA Forum, you are missing out on a great benefit of IOIA membership! Contact the <u>Forum Admin</u> to get signed up.

Two Apprenticeship Opportunities for 2023

Organic Livestock Inspector Apprenticeship Opportunity

Piloting the first IOIA/Industry apprenticeship partnership – at Organic Valley headquarters in Wisconsin – Organic Livestock Inspector Apprenticeship Intensive – July 24-29!



IOIA recognizes the obstacles to recruitment and retention of quality auditors in the industry and moves to address these concerns with a robust on-site apprenticeship training program.

The Apprenticeship Program is open to qualified apprentice inspectors who have successfully completed a basic course. Once accepted the apprentice will work with an experienced, IOIA approved mentor to complete an intensive week-long course of inspections. This program includes a year-long support component whereby the mentor acts as a resource for the apprentice as they gain experience in the industry, regardless of certifier.

Organic Valley Joins as a Supporter of the IOIA Apprenticeship Pilot Program:

"Organic inspectors play a vital role in the organic certification framework and are largely responsible for verifying the integrity of organic standards." – Kelly Placke, CROPP Cooperative/Organic Valley farmer-owner, Cuba City, WI

To learn more about participating as an apprentice livestock inspector – please see <u>https://www.ioia.net/apprenticeship/</u> Farmers Advocating for Organic (FAFO) funding makes this training available at no cost to apprentice inspectors, who will only be asked to pay their own travel to the event.

Apprentice Organic Inspector Opportunity

Organic apprentices are needed! In this unique partnership, IOIA will match apprentices to experienced mentor inspectors in a structured apprenticeship including 4 inspections (2 observing the mentor and 2 being observed by the mentor).

- Simple application process
- No registration fees
- Efforts will be made to regionally match apprentices and mentors
- Build a foundation for formal inspector apprenticeship and credentialing



IOIA, in partnership with The Accredited Certifiers Association (ACA), aims to complete a Mentor Job-Task Analysis for Organic Inspector Mentorship. This project is funded by a Cooperative Agreement between ACA and the United States Department of Agriculture (USDA) Agricultural Marketing Service (AMS), National Organic Program (NOP).

IOIA is seeking newly trained inspectors who will participate in this project as apprentices. Ideally, these potential apprentices will have taken basic training in one or more of the 4 NOP accredited scopes (crop, livestock, processing, and wild crop). Both independent and staff inspectors are encouraged to apply. Apprentices will not be paid for their time, and they must pay their own travel expenses.

ACA and IOIA are also seeking experienced organic inspectors to serve as mentors. Mentors will provide guidance, support, and training to new inspectors as they gain experience in the field.

Apprenticeships must be completed by August 31, 2023.

Google form link - Apprentices

Google form link - Mentors

Organic Inspector Scholarships - Deadline to apply October 1

Newest Scholarship - Reynaldo De la Rosa

IOIA is accepting applications for the Reynaldo De la Rosa Scholarship Award, which provides full tuition for an IOIA-sponsored organic inspector training course located in Latin America. This scholarship is available to people that are intending to be working as organic inspectors in Mexico. Both prospective and experienced inspectors are eligible to apply. It is awarded to an individual on the basis of need and potential as judged by the IOIA Scholarship Committee. The Scholarship pays for tuition, room and board, and a stipend for travel.

Reynaldo De la Rosa was an organic inspector, passionate organic advocate, father, brother, and active member of the broader Mexican organic community.

Many people do not realize it, but Mexican organic inspectors face a unique and sometimes dangerous set of working conditions. To have cherry tomatoes on a salad in

winter or dried mangos in the United States means there is an inspector visiting dozens of farms on the organic coop in Baja or the mango groves and coffee plantations of Sinaloa or Chiapas. Most often this simply means long, exhausting days driving dirt roads, eating bad food for dinner and grabbing breakfast at Oxxo (Mexican equivalent of 7-11), but sometimes it means getting held up by narcos at a highway checkpoint en route to the tomato fields, or contracting cholera from tainted water on a coffee inspection. For brothers Ernesto and Reynaldo de la Rosa, these have been the costs of working for many years as organic inspectors in Mexico.

The Deadline for returning all Scholarship applications is October 1. Scholarship recipients are notified by December 15. Application forms are available at www.ioia.net/scholarships/ Each year the Reynaldo De la Rosa Memorial Scholarship will be awarded to a Mexican inspector to cover the cost of an IOIA basic training, plus a stipend to cover lodging and transportation.

Applicants may choose to attend any IOIA-sponsored course during the year in which the scholarship has been awarded. For 2023-2024, this scholarship is available for basic online courses; in the following years it will be destined for face-to-face courses in Latin America.

Andrew Rutherford Scholarship

IOIA accepts applications for the annual Andrew Rutherford Scholarship Award, which provides full tuition for an IOIA-sponsored organic inspector training course during the following year. Both prospective and experienced inspectors are eligible to apply for the Rutherford Scholarship. It is awarded to an individual on the basis of need and potential as judged by the IOIA Scholarship Committee. Applicants can choose to attend any IOIA-sponsored training. The Scholarship pays for tuition, room and board but does not cover transportation or other expenses.

The late Andrew Rutherford was a farmer, organic inspector, and organic agriculture researcher from southern Saskatchewan. He served on IOIA's initial steering committee and then several years as a Founding Board Member.

Organic Community Initiative Scholarship

IOIA also offers an annual Organic Community Initiative Scholarship (OCIS), which provides full tuition for an IOIA-sponsored basic organic inspector training during the following year. It is awarded to an individual on the basis of need and their potential to have a positive impact on their regional organic community. The Organic Community Initiative Scholarship is only open to applicants from outside of the US or Canada. Applicants can choose to attend any basic IOIA-sponsored training. The Scholarship pays for tuition, room and board but does not cover transportation or other expenses.





Live Online Basic Training

Camera-shy Trainings: Crop February 6-10 with Nate Powell-Palm and Jonda Crosby; and Livestock Feb 27 - March 3, with Garry Lean.



Online Basic Processing course, March 2023, trainers Garry Lean and Nate Powell-Palm, top row #1 & 2 from left.

Hong Kong Training – January 10th through March 2nd of 2023



Live Online training with Hong Kong Baptist University, Department of Biology. Twelve sessions of 3 hours each, plus the exam administered by HKBU at the campus in Hong Kong. Trainer Luis Brenes and 22 participants.

Onsite Basic Training – IOIA and WSDA, May 1–5







IOIA and Washington State Department of Agriculture (WSDA) cosponsored basic crop inspection training in Mt. Vernon, WA May 1-5. WSDA arranged outstanding field trips and supported the training onsite with staff. Trainers Nathaniel Powell-Palm and Jonda Crosby delivered the course with 18 participants.

Next up – basic processing inspection training at the same venue later in May.





AGM Highlights

The 31st annual meeting of IOIA was held at the Hyatt Centric Hotel, New Orleans, Louisiana, January 23, 2023, the first in-person meeting since 2020. Advanced training was on January 27 and was well-received by the 25 attendees.

A touching keynote was by presented by **Nathan Slabaugh**, Spokane, Washington - "Telling Our Story". He presented 3 videos; *Become an Organic Inspector* (produced by Nathan working with IOIA and now available publicly on the NOP website); *What Does Organic Mean to You?*, and *IOIA 30 years - a brief oral history*. Nathan also noted that as he made these videos, he learned much about the organic industry. Here are the full links to the videos:

Become an Organic Inspector: https://www.youtube.com/watch?v=bY85KUR7VM0

What Does Organic Mean to You ?: https://vimeo.com/793646307/66d343284d

IOIA 30 years, A Brief Oral History: https://vimeo.com/793645382/977a373f6b

A Rough recording of the actual keynote, worth watching can be found on our youtube channel.



Quorum met with inspector/voting members present (28), members online (12) and proxies (3). Special thanks to the members who joined online, in spite of some technology glitches and stayed with us. Those members included past board members and Eric Feutz, who is to be commended for yet another stellar ballot of board candidates.

On Jan 23 we kicked off the week-long event with a historic walking tour of the French Quarter. A lot of fascinating history, great food and beverage tips, and a few ghosts. Here is the group in Jackson Square with the famous St. Louis Cathedral in the background.

Photo by tour guide Scott McGlinchey.



Janine Gibson, Manitoba, Canada, Chaired the Annual Meeting on the afternoon of January 23 - also her birthday. She was presented with a card signed by those present, and flowers.



Alvaro Martinez, IOIA member from Portugal, with Margaret Scoles at the Organic parade.





The camera just loves T Layhew, whether he's in a dapper white suit with outgoing board member Brian Baker, or hanging out in 'inspector clothes' with board chair Beth Dominick.

AGM Highlights

At right, Beth Dominick announces the winners of an abundantly delectable and abundant box of regional specialties brought by board members.

Beth asks, "Do you want speed or do you want accuracy?" Ah, the age-old question familiar to inspectors. She organized the fun team competition, which included collecting a sample of rosemary, clearing a TSA checkpoint, and answer-



Beth "judging" Darren Maum while he completes the TSA checkpoint station in the contest.



Chuck Mitchell – distracting the contestants, probably talking credentialing.



Below, left to right, Jennifer Taylor, IFOAM North America president; Nate Powell-Palm; Margaret Scoles, Garth Kahl. Our ED was literally wearing two hats in the parade, representing both IOIA and IFOAM North America.





The "Celebrate Organic" Parade! Doyle Cooper of the Red Hot Brass Band organized the parade, assembled the band, and led the parade in style.

2024 AGM under development for San Antonio, Texas, late January/early February, in conjuction with the NOP and ACA training conference.



In the Mardi Gras mood at Lafitte's Blacksmith Shop Bar, the oldeset bar in the US.

Following rousing discussion at the 2023 AGM, a membership survey was conducted. Results? 35 responses, mostly members who said they would probably attend. Clear support to join again with ACA and NOP in San Antonio, TX late Jan/early Feb. Advanced training? Yes. In-person AGM? Yes. Hybrid format important to allow for remote attendance? Yes! Watch for further developments. And meanwhile, IOIA is exploring Puerto Rico for 2024. General consensus is that IOIA will not always join ACA.



This report highlights and celebrates the diverse faces of IOIA's community and our robust partnerships and alliances that allow us to continue making a high impact around the world. IOIA successfully engaged in 7 projects in 2022 that were funded by grants and cooperative agreements, all while implementing an ambitious new Strategic Plan. The following projects were funded by the USA National Organic Program's Human Capital initiative and all addressed diversity, equity, and inclusion. IOIA implemented a DEI statement in training and employment applications.

Bridging the Gaps: Enhancing Organic Programs in Postsecondary Education to Expand and Diversify the Certification Workforce Pipeline

Working with Oregon Tilth, Oregon State University, University of Wisconsin-Madison, and Iowa State University, we evaluated postsecondary sustainable and organic education programs through the lens of diversity, equity, and diversity to identify gaps in the existing pipeline. IOIA created a video, now available as a public asset, to attract and grow the organic inspector profession. Acknowledging the worrisome homogeneity of organic inspectors, it featured 13 inspectors across a wide range of diversity (age, ethnicity, gender) – watch



for their faces throughout this report. IOIA created talking points for career advisors and a presentation for use by experienced inspectors, professors, or certifiers. Click on the image to view the video.

Building a Sustainable and Inclusive Apprenticeship Program for Organic Inspectors and Other Organic Professionals



The largest dollar value project in IOIA history, this collaborative partnership developed media assets and models for transition trainer training and apprenticeship intensives and trialed them. Partners were KY Department of Agriculture, Organic Association of KY, University of KY, KY State University, and the Organic Integrity Cooperative Guild. We successfully met the goal of achieving a highly diverse cohort for testing the model out of dozens of applicants. The cohort included a consultant, a reviewer, small farmers, college students, independent inspectors, and certifier staff. Read more in this report.

Diversity, Equity, & Inclusion Tools for Organic Professionals

This project led by the Organic Farmers Association made DEI training

and resources available for certifiers, inspectors and others. In 2022, the project funded several internships; IOIA hosted an intern, Dr. Onyekachukwu Akaeze. He attended a series of IOIA trainings, including an apprenticeship intensive.

WINTER/SPRING 2023

Annual Report 2022 Overview

STRATEGIC PLAN OBJECTIVE 1

Design IOIA training products to evolve with the sector, expand capacity, and grow skills for organic inspectors and other stakeholders



380 members in 18 countries!



IOIA's Training Institute delivers Self-paced, Webinar, Onsite, Live Online Training. In 2022, IOIA implemented Strategic Plan training initiatives including:

- New COR Processing Inspection course
- Basic training both live online and in-person.
- New post-training evaluation process
- In-person advanced training (first in 2 years!)
- Collaborated with ACA and NOP on their annual conference and training online.
- Began organizing a Training Advisory Council.



2022 AGM Keynote Bernward Geier, Is a 100% Organic World possible?



Advanced Organic Inspector Training in Saskatoon, Saskatchewan - in conjunction with the Organic Connections conference. Planned in 2000, postponed due to the pandemic, and finally brought to fruition in November 2022.



Annual Report 2022 Overview

STRATEGIC PLAN OBJECTIVE 2

Advocate for the inspector profession to the organic sector, while engaging stakeholders, to increase membership benefits and grow the community

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• A human capital working group was jointly funded by the Accredited Certifiers Association and IOIA who together published a comprehensive Final Report, available on both organizations' websites. Twenty-two inspectors worked on this project. The report was distributed to all certifiers in Canada and the Canadian Food Inspection Agency. IOIA and ACA jointly publicly launched the report.

• Submitted strong, comprehensive comments to NOSB and NOP proposals and discussion documents including NOSB Oversight improvements to deter fraud: Modernization of organic traceability infrastructure, and NOP Organic Livestock and Poultry Standard

• Initiated "Coffee with IOIA" to extend the outreach to non-members.

- Communicated with Certifiers via monthly meetings with the ACA board and regular Certifier-Inspector dialog conference calls
- Increased digital communications by 40% including our 30th Anniversary Newsletter

Message from the Chair - I'm both humbled and extremely proud to be serving as Chair at this time. As we move into a new season with renewed optimism and faith in our values as organic inspectors, let's acknowledge the tremendous legacy of voluntary and paid hours that have brought us as IOIA, into this Celebration of our 30th year of service. We celebrate along with IFOAM's 50 years of efforts toward maintaining organic integrity! We have so much to celebrate. Our mis-

sion is more valid today than it's ever been. We've addressed issues and concerns of organic inspectors, provided quality inspector training, and have done a huge amount to promote integrity and consistency in the organic certification process.

It's the <u>people</u> and the people we get to work with who make service to this organization so meaningful. I remember the first time I went to the Guelph Conference with our IOIA inspection manual and asked Tomas Nimmo, "Can I have a corner of a table to do this? I want to promote our inspectors' association so we can have more uniform training and more members in Canada."

As part of the leadership team, we thank each one (staff, contractors, and volunteer team) and all our organic community, for your efforts to improve the depth of cooperation and partnerships as individuals and as the IOIA community.

Observing this gratitude and commitment to improvement in our sector sustains me personally. Thank you for being part of the organic community of IOIA!

New Policy Comment Committee Facilitator! Rachel Cherry Myers





International Organic Inspectors Association Box 6 Broadus, MT 59317 406.436.2031 www.soa.net According Carillers Association

PO Box 332, Port Richey, FL 34673 844.783.7974 www.accreditedcertifiers.org

Inspector Retention Working Group Report Version 1, Published September 2022



Annual Report 2022 Overview

STRATEGIC PLAN OBJECTIVE 3

Implement a clear and structured operations protocol that holds IOIA accountable for continuous improvement within the organization, and advances the IOIA mission



Bottom Line Summary for 2022

Actual bottom line was about \$83,000 better than expected.

Much of that was due to a delay in filling the planned and budgeted position of Business Development Director. Also contributing to the positive bottom line, about \$25,000 from a Farmers Advocating for Organic (FAFO) grant was received in 2022. The expenses will show up in 2023 bottom line.

We did not need to dip into cash reserves.

Since 2019, about \$125,000 has been invested into the new website and database. That project was completed in 2022.

In Appreciation...

to **Brian Baker**, outgoing Board member, editorial review consultant to the Policy Committee, writer of technical article for IOIA newsletter, and BOD liaison to Scholarship Committee. And to **Chuck Mitchell**, for 6 years of service, and able participation on the Latin American, Canadian, and Asia Pacific committees.



TOTAL LIABILITIES & EQUITY	\$456,489.50	\$426,117.04	
Total Equity	456,489.50	426,117.04	
Net Income	30,105.86	-27,920.50	
Retained Funds	379,747.41	407,667.91	
Restricted (Scholarship Funds)	17,604.43	17,337.83	
Contributed Property-FMValue	29,031.80	29,031.80	
Equity			
LIABILITIES & EQUITY			
TOTAL ASSETS	\$456,489.50	\$426,117.04	
Accumulated Depreciation	-21.541.65	-21,541.65	
Other Assets			
Total Building	38,768.86	38,768.86	
Fixed Assets			
Total Current Assets	439,262.29	408,889,83	
Total Other Current Assets	23,708.08	24,089.10	
Accounts Receivable	-174.08	249,41	
Total Checking/Savings/CDs	415,728.29	384,551.32	
Current Assels			
ASSETS	Dec. 31, 2022	Dec 31, 2021	
	LO LL		



The First Reynaldo De la Rosa Memorial Scholarship

was awarded to Diana Jennifer Aguilar G. of Mexico. The Andrew Rutherford Scholarship was awarded to Rachel Chapman of Vancouver BC and the Organic Community Initiative Scholarship to Balkrishna Dahal of Nepal.

Rachel Cherry Myers, chair 2021-2022, and Heather Donald, treasurer/ secretary, left the board in 2022.



Why We Sample by Dr Brian Baker

rganic practices avoid the use of chemicals that pose threats to health and ecology. One of the main reasons why people buy organic food and pay a premium is the reduced risk of dietary exposure to pesticides. Many also do not wish to eat food that is produced using genetic engineering and other excluded methods. However, even the most diligent organic producers may find residues of substances prohibited for use in organic farming or made by excluded methods in their products. We live on a polluted planet. Fraud is also a fact.

Organic producers and handlers are required to implement measures that mitigate the risk of inadvertent contamination by prohibited substances



and excluded methods. Failure to take such precautions may not be as serious as fraud, but it is still a non-compliance that may require corrective action and even suspension of certification if the problem is persistent or serious enough. Organic inspectors collect and send samples of organic products to laboratories to verify compliance. While the presence of a prohibited substance is not proof of fraud, it is forensic evidence that a prohibited substance is present and as such, requires further investigation as to whether the residual contamination was the result of fraud, negligence, or circumstances beyond the operator's control.

The three pillars of organic certification are on-site inspections, audits of the records, and laboratory analysis. All three are needed to support a robust program to verify compliance. No one pillar is sufficient to support certification and the removal of any one of the pillars weakens the program. The possibility of random sampling for prohibited substances and excluded methods is considered to have a deterrent effect on fraud. An operator who knows that an inspector may show up unannounced to collect a sample is likely to think twice about deliberately applying a pesticide.



The USDA's Pesticide Data Program—run by the Agricultural Marketing Service—has tracked the levels of pesticides in organic and non-organic foods in the stream of commerce since 1994. Studies comparing pesticide levels over the past almost 30 years has consistently shown that 1) organic food is less likely to be contaminated with pesticide residues than conventional food, 2) conventional food is more likely to be contaminated with residues of more than one pesticide, and 3) when contaminated, organic food has significantly lower levels of pesticide residues than conventional food. Taken together, eating organic food lowers dietary risk from exposure to pesticides. Sampling bolsters the claim that organic food reduces pesticide risks. However, we cannot guarantee absolute safety or zero risk.

Investigation of the sources of contamination have found that the most likely sources are 1) drift from neighboring conventional farms, 2) soil contaminated with persistent pollutants, 3) post-harvest handling in facilities that handle both organic and non-organic commodities, and 4) fraud. Each of these can be mitigated but not eliminated by planning and safeguards, with the inspectors having an obvious role in detecting and preventing fraud. Sampling is one tool we inspectors use.

Under Development for Fall 2023

200 level Residue Sampling webinar with IOIA trainer Nathaniel Powell-Palm. Watch our website and the next newsletter for availability!



SOE – What it means for inspectors, from page 4

Grower Groups: 205.201(c) – entirely new, detailed section. Grower Groups and Internal Control Systems are finally in the NOP rule. Very important if you inspect grower groups. (Reference: excellent article and comparison chart by Gabi Soto and Michael Sligh in the April issue of *The Organic Standard* comparing the EU and NOP regulatory changes.) More on Grower Groups! In 205.400 and 205.402.

Organic Certificates must be issued from OID: The certifying agent must issue a certificate of organic operation, it must be generated from the Organic Integrity Database, and it may be provided to certified operations electronically.

NOP Import Certificates: Electronic import certificates are required and must be issued through the Organic Integrity Database (OID). Only certifying agents accredited by the USDA or foreign certifying agents authorized under an organic trade arrangement may issue an NOP Import Certificate. This is mostly for certifiers, but inspectors will see them in our tracebacks.

Calculating % of Organic Ingredients: 205.302(a) was updated, finally, in an effort to make it crystal clear how to calculate composition of multi-ingredient products. What is explained in the rationale for the new wording seems to contradict the actual wording. Maybe they didn't get it crystal clear? Fortunately, not really an inspector issue. We just need to follow the lead of the certifier(s) we work for.

Labeling of nonretail containers: 205.307 updated and clarified! "Nonretail containers used to ship or store certified organic agricultural products must display: (1) Identification of the product as organic; and (2) The production lot number, shipping identification, or other unique information that links the container to audit trail documentation." Audit trail documentation must identify the last certified operation that handled the agricultural product. Shipping containers of domestically produced organic product intended for export may be labeled in accordance with any shipping container labeling requirements of the foreign country of destination or the container labeling specifications of a foreign contract buyer: Provided, that, the shipping containers and shipping documents accompanying such organic products are clearly marked "For Export Only" and: Provided further, that proof of such container marking and export must be maintained by the handler.

Mass-balances and trace-backs: Finally in the rule! In 205.403 - required to show, "that quantities of organic product and ingredients produced or purchased account for organic product and ingredients used, stored, sold, or transported (that is, inputs account for outputs);" and That organic products and ingredients are traceable by the operation from the time of purchase or acquisition through production to sale or transport; and that the certifying agent can verify compliance back to the last certified operation." This is not a change to what we should already be doing.

Annual Inspection must occur in the calendar year: "The certifying agent must arrange and conduct an on-site inspection, pursuant to § 205.403, of the certified operation at least once per calendar year." 205.406(b)

Risk-based Supply Chain Audits: Required, new in this Rule. This could be an area for the advanced inspector to specialize.

The Side by Side comparison of the two versions of the rule (before and after SOE) are especially helpful. IOIA Trainer Garry Lean re-formatted the NOP's chart into a chronological chart which may be easier to follow. <u>Here's the link.</u>

Supporting Documents on the NOP SOE webpage

- Final Rule
- <u>SOE Fact Sheet (pdf)</u>
- <u>Side-by-Side Comparison (pdf)</u> (current regulations to final rule)
- <u>Electronic Organic Import Certificate</u>

Board Minutes

IOIA Board of Directors – Minutes November 17, 2022 – Conference Call

Attendance: Janine Gibson, Chair; Beth Dominick, Kate Newkirk, Allan Benjamin, Brian Baker, Terrance Layhew, Others: Margaret Scoles, Executive Director. Regrets: Chuck Mitchell

Treasurer's Report: Draft 990 IRS was reviewed by the Board.

Strategic Plan - Post Training Evaluations: Incentive for respondents? Final choice – Chance to Win \$250 with a drawing every quarter.

Transition to Organic Partnership Program -TOPP: Margaret is proactively reaching out to leads.

IOIA Board of Directors – Minutes December 15, 2022 – Conference Call

Attendance: Janine Gibson, Chair; Beth Dominick, Kate Newkirk, Allan Benjamin, Brian Baker, Chuck Mitchell Others: Margaret Scoles, ED. Regrets: Terrance Layhew.

Treasurer's Report: 2023 Draft Budget and 2022 Financial Review. Giving free supporting individual membership for 2 years to those taking basic training has hurt IOIA financially. No increased retention, and about \$10,000 less membership dues income each year for the past two years. Allan/Chuck move to drop free membership to those attending basic training. Motion carried. Discount for training will be reinstated so the applicant who joins with the basic training gets a larger discount (\$75). Beth - sliding scale membership for those who need it, would like to explore this. Discussion of 2023 budget, Plan to approve final at Jan. meeting.



Camera-shy: Allan Benjamin, Beth Dominick

Strategic Plan - Staffing Plan: Ellie and Margaret have finalized

5 new Job Descriptions. IOIA will advertise 3 of those, with the expectation of hiring the best fit for two positions. Staff meeting next Tuesday with the whole staff to explain. They may choose to apply for any of the 3 positions. The goal is to have positions advertised before the end of this year. Ellie will reach out to Janine about the ED Evaluation to see how she can assist there, making sure she, Beth, and Allan have the support they need.

Reports from Scholarship and Accreditation Committees: fall rounds completed.

2023 AGM: Report on final preparations. Ballot has 5 candidates for 2 positions.

IOIA Board of Directors – January 11, 2023 – Conference Call

Attendance: Janine Gibson, Chair; Beth Dominick, Kate Newkirk, Allan Benjamin, Brian Baker, Terrance Layhew, Chuck Mitchell Others: Margaret Scoles, ED.

Treasurer's Report: Discussion of 2023 Budget. Budget to be amended and voted on by email in coming week.

Strategic Plan – ED Evaluation: Al, Beth, and Janine met with Margaret re: evaluation. Key Performance Indicators - will winnow points down to 2-3 points to accomplish in next 6 months.

Prepare for ACA/IOIA Joint meeting: Margaret and Ellie meet the week before and decide agenda. Ellie chairs, Margaret takes minutes. Talk about TOPP proposal. Next meeting with ACA 1/19/23.

Margaret Salary Discussion: Margaret is treasurer and will run for IFOAM North America board if supported by Board. Brian encourages members of this board to participate and get elected themselves.

Board Minutes

IOIA Board of Directors – February 16, 2023 – Conference Call

Attendance: Janine Gibson, Chair; Beth Dominick, Vice Chair; Allan Benjamin, Treasurer; Kate Newkirk, Secretary; Terrance Layhew, Director; Margarito Cal, New Director Member, Kathe Purvis new Executive Member at large; Others: Margaret Scoles, Executive Director

Debrief Annual Meeting: Good AGM meeting, food good, more planning for hybrid meetings in future. Meeting had heart, Beth's contest was great, room barely large enough. Lots accomplished in 2022. Kathe wished she was there!

2024 Annual Meeting Discussion & Member Survey: Meeting with ACA? make it part of the Survey. Get out Member Survey review for next meeting. Boycott/Banned States that limit civil and human rights (mostly southern states)? Survey should ask will attend both or which would they choose if only one. List all options. Ask, if don't attend in person would you attend remotely? And let them know 2025 AGM will be separate from NOP/ACA. Give them the list of locations for last 10 years. Kathe - the 2020 collaboration was brilliant.

Inspector Credentialing: Credentialing Committee [Kathe, Janine (board liaison) (both are international members and

should be included), Garth Kahl, Leonard Pollara, Silke Fuchshofen, Joe Ward, Darren Maum, Mariann Holm, Brian Baker, Angela Wartes-Kahl, Chuck Mitchell, Rob Macdonald, Nadene Gurule]. Credentialing can't be more "stuff we have to do". It has to add value. IOIA needs to see that credentialing works for inspectors. SOE has had big impact around the world. We had RFA proposal, partner with ACA, regarding credentialing that was not funded. Partnering with Alliance for Organic Integrity for 3rd party credentialing and 20 Module e-learning available internationally.

Election of 2023-2024 Officers: see insert at right.

Committee needs (recruiting), BOD liaisons: BOD Liaisons assigned.

Meeting times for BOD meetings: Keep meetings 6pm-8pm 3rd Thursday's. IOIA/ACA joint BODs will be 1pm Eastern.

Strategic Plan - ED evaluation wrap-up: Margaret did a self-evaluation, Janine, Beth and Allan performed evaluation. 3 KPI's (1)- Finance management Success! (2) Successful completion of RFA's with NOP (3) Increase IOIA capacity (hire new positions). A lot of commonality between Margaret's self-evaluation and that of the board. Margaret -is evaluating staff, great staff, self-directed work well. Will likely hire 3 staff. Margaret's focus.

IOIA Board of Directors – March 16, 2023 – Conference Call

Attendance: Beth Dominick, Chair; Janine Gibson, Allan Benjamin, Kate Newkirk, Terrance Layhew; Margarito Cal, Kathe Purvis. Others: Margaret Scoles, Executive Director.

2023 Annual Meeting: Moved to post the draft 2023 AGM minutes as amended, accepted.

Review Survey Results for 2024 AGM: The survey of the members gathered 34 responses. Strong preference for hybrid, and definitely an in-person option. February was top choice for timing. Janine moves we plan for San Antonio in 2024 and consider Puerto Rico in 2025. There are certified producers including University of Puerto Rico. Collaborator? reach out to them, and an exploratory committee for 2025. Margaret will talk with QCS and the University of Puerto Rico.

Inspector Credentialing: Robust discussion. Lots of people interested but will be slow with self-organized volunteers. Need to Include reviewers and make ACA a partner, keep NOP focus for now and move to other programs later. We should address inspectors in NOP first then move to others; international (prioritize per demand), apprenticeship, journey person levels to follow. Confirmed that the WG has endorsement by BOD to continue as an IOIA WG. There has been a lot of related prior work by IOIA.

Strategic Plan and 2023 Annual Work Plan: Reviewing a summary of progress from October BOD meetings with facilitators Monique Marez and Ellie Hudson. Reviewed status of Objectives. A decision needs to be made what are key objectives for 2023. Margaret, Beth and Janine will go through the Strategic Plan prior to next BoD meeting. A draft 2023 Work Plan will be developed. Margarito - contacted Latin American Committee and their comment was that there was not enough training occurring within reach of members (accessibility and affordability). Also came up in Scholarship Committee.

New Board Officers: Beth Dominick - Chair Janine Gibson - Vice Chair Kate Newkirk - Secretary Allan Benjamin - Treasurer Kathe Purvis - Executive Committee at Large Terrance Layhew, Director Margarito Cal, Director



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KEEP IOIA STRONG - LEND YOUR STRENGTH AND GET INVOLVED!

2023 Calendar

July 7 IFOAM North America Annual Meeting, 10 a.m. Pacific

September 20 - 23 Expo East

September 18 - 24 Organic Week Canada

October 24 – 26 Fall 2023 NOSB Meeting, Providence, RI.

November 7 – 9 Organic BC Conference will take place in Penticton. The theme of this year's conference is Building Bridges. It's our 30th anniversary and we are planning our biggest and best event yet!

November 20 - 21 Organic Summit 2023, Ottawa, Canada

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