

## Human Capital - Inspectors Rise to Top Billing

On July 31, Deputy Administrator Jennifer Tucker, Ph.D. issued a memo to the National Organic Standards Board, *"Request for Discussion and Recommendations: Human Capital Strategy for Organic Inspectors and Reviewers"*. She called for the NOSB to facilitate a public discussion and provide recommendations related to a human capital strategy.

Serendipitous timing. Just a few weeks earlier, the IOIA's Town Hall Committee had discussed inviting Dr. Tucker to a Town Hall to discuss human capital. The committee was concerned about the lack of a reliable way to bring on new talent and retain and reward the experienced talent. Almost immediately, and complete unrelated, Dr. Tucker issued a "Coffee with the Deputy" invite for July 15. Many of IOIA's inspector members welcomed this opportunity to hear from and engage directly with her. Dr. Tucker also accepted an invite to the IOIA Town Hall on August 27 to dialogue with inspectors about the "Human Capital" issue. Forty inspectors took part in the virtual call.

The Town Hall is proving to be a valuable forum for discussion and building community. Town Halls are open to all inspector members of IOIA and at no charge. Now, inspectors have the opportunity to engage on even a larger stage - the fall (virtual) NOSB meeting. Organic inspectors and reviewers will be on the NOSB's work agenda. The repercussions of what may look at first glance like a U.S.-centric topic will undoubtedly reverberate around the globe. The profession of organic inspection is about to be re-invented. Inspectors can either sit back and watch from the sidelines, or they can engage in transforming the future. Next Town Hall is September 24.



**Dr. Jennifer Tucker,  
Deputy Administrator,  
National Organic Program**

### What is human capital?

From the memo - "Human capital refers to the skills, knowledge, and experience held by an indi- See Capital, p 14

### [Read the Memo](#)

"The goal of this paper is to initiate a dialogue within the organic community about the broad set of human capital dimensions that may support the ongoing development of a robust and well supported pipeline of organic professionals over time."

### Notes from the Chair

by Lois Christie

Agricultural Marketing Service (AMS) NOP Deputy Administrator Jenny Tucker sent a Memo to the NOSB requesting that they facilitate a public discussion related to a Human Capital Strategy for Organic Inspectors and Reviewers. In response to this Memo, several IOIA members (myself included) decided to put into motion an idea that had been kicked around for a long while: It was time to establish a viable mentoring program. This program will be designed to train and guide new inspectors, while mentors are paid for their time and knowledge. As independent inspectors, we have usually historically done this training on our own - for free. As it is currently envisioned, the mentor training program will take place after an IOIA farm, processing and/or livestock training is successfully completed. IOIA trainings are amazing, but they do not take the place of the field inspection See Notes, p 4

**Welcome New Members**

**New Inspector Members**

Angelica Adams, Portland, OR  
 Wilber Elescano Paucar, Satipo-Junin, Peru  
 Dovid Feder, Chicago, IL  
 Mark Keating, Belvedere, NJ  
 Meghan Patrick, Louisville, KY  
 Julia Elizabeth Perez Lyons, Oaxaca, Mexico  
 Tirsia Picado Calvo, Heredia, Costa Rica

**Returning Inspector Members**

Joseph Black, Rutledge, MO  
 Michael Horwath, Creston, CA

**Upgrading to Inspector**

Megan Allen, Reno, NV  
 Gregory Barber, Sanger, CA  
 Sylvia Gibson, Whitehorse, Yukon CAN  
 Laura Natrasony, Fork River, AL CAN  
 Rachael Savage, Lecompton, KS  
 Jeff Schlaf, Dearborn, MI  
 Rachel Winograd, Kingston, NY  
 Dana McWayne, Eugene, OR

**New Supporting Individuals**

Kathryn Cullen, Portland, OR  
 Christopher Lent, Shickshinny, PA  
 Margaret Liddiard, Susanville, CA  
 Keith Moehn, Hilbert, WI  
 Melissa Rosero, Torrance, CA  
 Tori Lyn Williams, Bayfield, CO  
 Carly Wilson, Encinitas, CA

**IOIA BOARD OF DIRECTORS**

- CHAIR —
- LOIS CHRISTIE
- VICE CHAIR —
- JANINE GIBSON
- TREASURER —
- RYAN SITLER
- SECRETARY —
- HEATHER DONALD
- EXECUTIVE COMMITTEE AT LARGE —
- PHILIPPE DESCAMPS
- DIRECTOR —
- RACHEL CHERRY MYERS
- DIRECTOR —
- CHARLES 'CHUCK' MITCHELL

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

**WEBINAR Training Schedule**

for details & to register go to: [www.ioia.net/schedule\\_list.html](http://www.ioia.net/schedule_list.html)

**100 Level Webinar - September 22 and 29, 2020**

**IOIA/COTA COR Processing Standards**  
 9:00 a.m. - 12:00 p.m. (Pacific) Two 3 hour sessions.  
 Trainer: Kelly Monaghan IOIA member cost \$325 (IOIA and COTA, \$300)

**200 Level IOIA/OMRI Webinar - September 23, 2020**

**NOP Livestock Input Materials (postponed to a later date)**  
 9:00 a.m. - 12:00 p.m. (Pacific) One 3 hour session.  
 Trainer: OMRI Trainer, Phoebe Judge.  
 IOIA member cost \$275 (IOIA and OMRI \$250)

**100 Level Webinar - October 6 and 9, 2020**

**NOP Crop Standards**  
 9:00 a.m. - 12:00 p.m. (Pacific) Two 3 hour sessions.  
 Trainer: TBD IOIA member cost \$325

**100 Level Webinar - October 27 and 30, 2020**

**NOP Livestock Standards**  
 9:00 a.m. - 12:00 p.m. (Pacific) Two 3 hour sessions.  
 Trainer: TBD IOIA member cost \$325

**200 Level IOIA/OMRI Webinar - November 10, 2020**

**NOP Processing Input Materials**  
 9:00 a.m. - 12:00 p.m. (Pacific) One 3 hour session.  
 OMRI Trainer, TBA IOIA member cost \$275 (IOIA and OMRI \$250)

**100 Level Webinar - November 16 and 19, 2020**

**NOP Crop Standards**  
 9:00 a.m. - 12:00 p.m. (Pacific) Two 3 hour sessions.  
 Trainer: TBD IOIA member cost \$325

**200 Level Webinar - November 17 and 20, 2020**  
**Livestock Feed Audits - Grazing and Non Grazing Season**

9:00 a.m. - 12:00 p.m. (Pacific) Two 3 hour sessions.  
 Trainer: Nate Powell-Palm IOIA member cost \$300

**200 Level Webinar - December 1 and 8, 2020**

**Processing In/Out Balances, Traceability & Recipe Verification under NOP & COR**  
 9:00 a.m. - 12:00 p.m. (Pacific) Two 3 hour sessions.  
 Trainer: Kelly A. Monaghan IOIA member cost \$275

**Webinar Discount Note:**  
 All IOIA Inspector Members are eligible for 1 half-price webinar in 2020.

**Learn more about Fraud Prevention and Traceability Techniques in free OILC Learning Center courses**

The NOP Organic Integrity Learning Center now offers two new courses designed to support professional development of people working in organic certification and compliance: NOP-100: Organic Fraud and the Criminal Mind and NOP-080: Traceability Techniques. Check them out [here](#).

**Accreditation News - Next Deadline to apply: October 1**

Congratulations to **Monique Scholz**, who successfully renewed her accreditation in all 3 scopes, Crop, livestock and processing.

IOIA's Accreditation Program is voluntary. Applicants must demonstrate Commitment to organics, Education, Work and life experience, Inspection experience (at least 2 years and 10 inspections), and Continuing education.

To learn more, apply or renew, [please see our website](#).

## *LIVE Online and Onsite Training Schedules full details and applications at [www.ioia.net](http://www.ioia.net)*

IOIA's Live Online Training courses require that participants first complete a 100-level Webinar on NOP Standards (2 sessions of 3 hours each) in the respective scope - Crop, Processing, or Livestock. Separate registration is required for this webinar unless previously completed. **Additional Requirements** for the course include participant reliable internet, a computer, and computer literacy.

**Detailed info, Application, Registration for all courses available on our [website](#).**

### **Live Online Basic Crop Inspection Training**

**October 26-30, 2020 - Application Deadline is September 14, 2020.**

**December 7-11, 2020 - Application Deadline is October 26, 2020.**

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

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

### **Live Online Basic Processing Inspection Training**

**October 5 -9, 2020 - Application Deadline is August 24, 2020.**

**Course Description:** The course provides basic level training to develop skills required for inspecting and reporting on the management of an organic processing production unit according to a specified set of standards. For courses conducted in the United States, the standard is usually the USDA, National Organic Program (NOP). However, this basic organic processing inspection course may also be presented using other standards as required (please contact the IOIA office).

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

### **Live Online Basic Livestock Inspection Training**

**November 16 - 20, 2020 - Application Deadline is October 26, 2020.**

**Course Description:** The course provides basic level training to develop skills required for inspecting and reporting on the management of an organic livestock production unit according to a specified set of standards. For courses conducted in the United States, the standard is usually the USDA, National Organic Program (NOP). However, this basic organic livestock inspection course may also be presented using other standards as required (please contact the IOIA office).

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

## *Self-Directed Learning Courses Now Available*

IOIA/American Grassfed Association Grassfed Dairy, Remote Inspection Training, and Dairy Feed Audit are now available to take during hours of your choosing! Read all about it on page 10.

## *Onsite Trainings*

**September 15 - 18, Tokyo, Japan - Basic Organic Farm Inspection Training**

**October 5 - 9, Saco, Maine **This training has been postponed to May 2021.****

**Basic Crop and Processing Inspection Training**

**November 2-13, 2020 - Farmington, Minnesota **This training has been postponed until October 2021.****

**Basic Crop and Livestock Inspection Training**

## In Memoriam – Reynaldo De la Rosa Santamaria

Reynaldo De la Rosa Santamaría passed away on August 1, 2020 after fighting Covid for over a month. He was a dedicated husband and father, brother and son. He is survived by loving wife Narda Fabiola Dueñas Villafuentes and teen sons, Erick Amaury and Diego de Jesús.

An exemplary organic inspector of many years, Reynaldo left a lasting mark on the organic movement of Mexico. Born and raised in Tlayacapan, Mexico to a large family of farmers and agronomists, Reynaldo's life was dedicated to his loved ones and agriculture.

A *GoFundMe* campaign has been started for Reynaldo's family. All funds raised in this campaign will go to the family to cover funeral costs, hospital bills and support them during this incredibly difficult time.

You can donate via this link: <https://gf.me/u/ymaxsh>



Brothers Ernesto and Reynaldo

## Mexico Earthquake Relief Fund – Huatulco

In early July, a major earthquake hit southern Mexico near Huatulco, the location of the 2019 IOIA AGM. Dixie Stark (sister of IOIA's ED and one of those who participated in the 2019 AGM events in Mexico) contacted her birding guide and sent \$500. He purchased essential supplies for 50 families and delivered the food to those in Pluma Hidalgo (the village that hosted the field trip and apiculture inspection course). He said another 60 families in the Passionaria community were badly in need of food. If you can help, please donate. Cornelio, the birding guide at Huatulco, will buy and deliver the food. There is no overhead, and all the money will go for food for those who have lost so much and had so little to begin with. [GoFundMe - Relief for Pluma Hidalgo](#)

## Notes, from page 1

experience. It is currently nearly as impossible for new inspectors to obtain consistent, quality mentoring as it is for experienced inspectors to be respectfully rewarded for their time and efforts. Thank you, Angela Wartes, Amanda Birk, Patti Bursten Deutsch, Pam Sullivan, and Terrance Layhew, for agreeing to participate!

During our IOIA/ACA bi-weekly joint boards meeting, we brought up our intention to create a Mentorship Committee. We noted that part of our premise is that it will need to be funded, at least in part, by certifiers and the organic community at large. The goal is to create a mentorship program that will pay mentors for their time and experience and give assurance to mentors that their jobs will not be affected by their helping to bring in new inspectors. This has always been one of the inherent problems in the process – inspectors need to be certain that they are not going to train someone who will undercut them by inspecting for less money.

The idea of mentorship is not new to IOIA. In 1998, IOIA developed the IOIA/OCC Apprenticeship Program with funding from IOIA, OTA's Organic Certifiers Council, and a USDA Agricultural Marketing Service grant. The program failed to move forward due to lack of a sound business plan that certifiers would adopt. In 2016, IOIA launched our on-site 2-day field training program with each participant watching an inspection and then completing their own inspection with a field trainer's feedback on Day 1. The next day, smaller groups of 2-3 participants completed a second inspection under the supervision of the trainer and wrote a second report. All participants said this was a great bridge between the basic training and inspecting. IOIA provided field training each year afterwards, including all 3 scopes. In the Summer Newsletter of 2019, Jonda Crosby wrote an article on ways to re-think the trainings and foster one-on-one field training. However, most entry level inspectors are not completing this formal field training, but rather are still seeking mentors on their own.

Up until now, there has not been a real shortage of inspectors; however, the shortage is now becoming a reality -- brought on both by the growth in the industry and the fact that many inspectors are retiring. Now is the time to create a solid mentorship program to fill the need for Human Capital.

I really enjoyed participating in the Aug 27 Town Hall including Jenny Tucker's presentation with Q&A on Human Capital. A special thank you to Patti & Margaret for their insight into these Notes.



IOIA Board Chair Lois Christie

## Notes from the ED by Margaret Scoles

It has been a tough summer. First, there was the pandemic which upended our lives as inspectors and as an organization. Just when we were starting to get adjusted to the “new normal”, we witnessed tragic death followed by protest and violence, and then drought set upon us here in southeastern MT. By July we received less than half our usual meager precipitation. Then, hordes of grasshoppers appeared. I was finally home for the whole summer and I had my first community garden plot. It was a plague - the worst hoppers here for about 40 years. It could be worse; we could have had fire. Our largest local fire was only 50,000 acres - nothing compared to the heartache to the West of us. The year has brought so much devastation - health, social justice, climate change, and fire.

There was so much that I couldn't do anything about. The last straw was when a couple racoons came in the night and packed off two of my six pet hens. I learned to trap coons. I also launched an organic attack on the grasshoppers. I sprayed neem oil and Pyganic around the garden,



and even a little in the garden. My closest gardening neighbor is also organic, so she sprayed a little Safer insecticidal soap on my

green beans. The hoppers ate the marigolds first, then the potatoes and most of the carrots. About half of us used organic methods and others sprayed something stronger (I am an organic inspector after all....). One of us (not me!) sprayed something toxic around the outer perimeter. One of the most effective

and pleasant tactics was loading my four venerable hens up in the dog porter and driving them to the garden. They loved it. They grazed a little, ate a lot of hoppers. I would just open the door of the carrier and tell them to “trailer up” and it worked pretty well. There was something amazingly Zen about my mornings. I'd go early - between 5 and 7 a.m. latest. I'd weed, catch grasshoppers, run the drip irrigation, and watch the hens until the grasshoppers got warmed by the sun and got too lively.

### Biggest celebratory note? Our successful completion of the OILC Enhancement Project!

On August 28, IOIA completed the submission of 70+ items developed for the Organic Integrity Learning Center, created by a total of 21 inspector member contractors. Lisa Spicka was the overall Project Manager. Jonda Crosby and I were content review. Each course was assigned a 4-member team of course lead, tester, writer, and media. **Huge kudos to everyone on these teams!** The project created enhancements destined for at least seven of the OILC courses and helped both our inspectors and IOIA weather the financial hurdles created by Covid-19. Project Sponsors: USDA AMS NOP; A P Ventures, LLC; and IOIA.

A “silver lining”: **\$12,500 from a Montana Coronavirus Relief Grant.** This Business Innovation Grant originated from federal CARES Act funding that was distributed to states. IOIA did not receive any direct federal disaster funding. However, Montana used some of their emergency funding to create a small grants program available to businesses including nonprofits

Most common refrain of this year?  
“2020 will be a year we will remember!”  
or “I can't wait for this year to be over...”.

who made business innovations in response to Covid-19. IOIA's proposal was based on the development of live online basic training and remote inspection training. And we were successful!

### A summer of unrest - Diversity, Equity, and Inclusion rises in public awareness even above the pandemic

In the flurry of summer Black Lives Matter statements and protests, IOIA considered joining with ACA to sign on to their statement of solidarity. However, inspectors will be inspectors; we always have to dig in deeper. The board decided we wanted to spend more time and develop a uniquely IOIA statement. The Board then decided to run the issue through the IOIA Comment Policy and Decision Tree. It was thrown to the IOIA Policy Committee to wrestle with. Should we make a statement? How do we make it an action-oriented statement that could generate positive change? Should there be a press release? The Policy Committee took on the task, dug in, and threw it back to the Board. Now the harder work begins. Do we need a Bylaws Change, or a revised vision and goals? Do we need to have a Policy that makes it more clear that all comments and policies are viewed at the beginning through the lens of diversity, equity, and inclusion? It would be nice to sit back on our haunches and say that we already are welcoming, diverse, inclusive, and equitable in everything we do. But all of the current IOIA staff are white, and at this moment all female. And our US/Canada membership is overwhelmingly white.

Interested in working on this issue? Let me know.

## Sector News

### Strengthening Organic Enforcement Proposed Rule: Public Comment Period Opens

The USDA National Organic Program's (NOP) Strengthening Organic Enforcement (SOE) proposed rule was published in the Federal Register on August 5, 2020. This proposed rule significantly updates the USDA organic regulations to strengthen oversight and enforcement throughout the organic supply chain. It proposes changes that implement provisions in the 2018 Farm Bill and addresses recommendations from the National Organic Standards Board and the USDA Office of Inspector General.

Deadline for public comment is October 5, 2020 at 11:59pm Eastern. [Public review and comment is encouraged.](#)

*OTA Newsflash, 7/29/20 Please see article on what this means for inspectors, page 16*

### National Organic Coalition and Organic Farmers Association Outraged Over FSA Announcement to Reduce Organic Certification Cost Share Reimbursements

USDA's Farm Service Agency (FSA) announced August 10 that they would be reducing reimbursement rates for the organic certification cost share program, which provides reimbursements to organic farms and handling operations. The Federal Register notice stated that FSA is "revising the reimbursement amount to 50 percent of the certified organic operation's eligible expenses, up to a maximum of \$500 per scope." The 2018 Farm Bill clearly set reimbursement rates at 75 percent of the certified organic operation's eligible expenses, up to a maximum of \$750 per scope.

NOC is asking that organic community members take action and voice their concern to the Senators and Representative: <https://www.nationalorganiccoalition.org/action-alerts> *NOC press release, 8/11/2020*

### OLPP Economic Analysis Notice: USDA Decision and Summary of Comments

The USDA Agricultural Marketing Service (AMS) will publish in the Federal Register a Notice responding to public comments on an Economic Analysis Report related to the Organic Livestock and Poultry Practices (OLPP) final rule (January 19, 2017) and final rule withdrawal (March 13, 2018). The Notice updates USDA's analysis, public comment, and decision-making process related to the OLPP final rule and rule withdrawal.

The notice is pending publication. [A draft version](#) is available for viewing on the AMS website. In the draft, the AMS defends the Economic Analysis Report, which concludes that the Regulatory Impact Analyses used for the OLPP and its withdrawal are flawed. However, the "AMS makes no changes to the conclusions set forth in the Withdrawal Rule that did not rely on the flawed RIAs and leaves the remainder of the Withdrawal Rule intact. In light of these findings and conclusions, USDA sees no basis for, and thus has decided not to take, any further regulatory actions or to make any policy changes with respect to the OLPP Rule." *NOP Organic Insider, 9/4/2020*

### NOP launches organic import certificate webpage

USDA's National Organic Program has posted a [new webpage](#) with helpful information about [electronic organic import certificates](#). These certificates are required by the 2018 Farm Bill and closely connected with the [Strengthening Organic Enforcement rule](#) currently underway. Once the rule is final, electronic organic import certificates will be required for all organic products imported into the U.S.. This will increase the transparency and traceability of organic products, and maintain the integrity of organic supply chains. This organic certificate was launched as an optional filing at the end of April 2020. U.S. organic importers who wish to request the [NOP Import Certificate](#) from exporters to include in their filing may do so at any time. *OTA Newsflash July 29, 2020*

### Philippines new organic law

After 10 years of advocacy, a bill recognizing Participatory Guarantee Systems (PGS) as an alternative and complementary tool to third-party certification in Organic Agriculture has been approved. This new law will encourage the growth of the organic agriculture movement in the country. *IFOAM press release, 6/30/2020*

<https://www.organicwithoutboundaries.bio/2020/06/24/how-pgs-changed-the-law-on-organic-agriculture-in-the-philippines/>

## Sector News

### Good News for Organic in Fiscal Year 2021 House Agriculture Spending Bill

The House Appropriations Committee took action on July 9 to pass the Fiscal Year 2021 Agriculture, Rural Development, Food and Drug Administration and Related Agencies Appropriations Bill, with good news for organic.

The bill would boost funding for the NOP at the USDA from \$16 million to \$18 million annually. The NOP is responsible for overseeing the growing organic industry, which stands at more than \$55 billion in sales annually in the U.S. There are 44,390 organic farms and operations in 149 countries. The NOP is charged with ensuring that the USDA organic standards are enforced in a uniform way around the globe and investigating complaints of fraud. The increase in funding recognizes the need to enhance enforcement procedures to safeguard the integrity of the organic label.

The spending legislation also includes a boost in funding levels for two critical organic and sustainable agriculture research programs: the Organic Transitions Program and the Sustainable Agriculture Research and Education (SARE) program. The House bill would fund the Organic Transitions Program at \$7 million in FY2021, a \$1 million increase, and would fund the SARE program at \$39 million in FY2021, a \$2 million increase. These research programs help farms tackle challenges so they can be more productive, climate-friendly, and profitable.

NOC is also pleased that the legislation includes a \$5 million for the Farming Opportunities Training and Outreach Program to support the needs of socially disadvantaged, veteran, and beginning farmers and ranchers in the ownership and operation of farms and ranches. The July 9 action is the first step toward passage and enactment of the final legislation.

*NOC press release, 7/11/2020*

### AGA Urges Small Processor Representation on Advisory Committee

The American Grassfed Association (AGA) is urging members of the 'niche' agriculture including organics to reject the newly appointed members of the USDA National Advisory Committee on Meat and Poultry Inspection, saying that small and very small processors have no seat at the table. The AGA press release outlines concerns that the largest foreign processor in the U.S. now has 2 seats on the committee (Pilgrim Pride - the chicken division of JBS) and JBS itself, a Brazilian corporation). Noting that USDA Food Safety Inspection Service, "appears to be way too close to JBS", the AGA press release goes on to explain that "JBS is the Brazilian corporation that was [convicted of bribing](#) between 1500 and 2100 inspectors and politicians in Brazil". AGA also wonders about JBS being on the committee that helps determine food safety and inspection policy.

AGA is calling for smaller processor representation on this committees; removing one or both of the JBS representatives from the committee; and initiating Senate hearings on how comfortable JBS and USDA FSIS are.

[Read AGA's Press Release and take action.](#)

### New lawsuit against USDA in GE labeling fight

Filed in U.S. District Court for Northern California, the plaintiffs say [the legal action](#) "is about ensuring meaningful food product labeling, the public's right to know how their food is produced, and producers' and retailers' rights to provide it to them. Throughout U.S. history, government-mandated food and ingredient information has always been the same: on packages and in language, consumers could understand." They are charging that a USDA rulemaking "is a significant departure from that standard." The lead defendant in the civil action is U.S. Secretary of Agriculture Sonny Perdue.

"Genetically engineered (GE) organisms have been a controversial topic in the public arena since their introduction into the food supply nearly three decades ago," the complaint says. "Advocates, including plaintiffs, sought their labeling, like the labeling mandated by 64 other countries around the world. After several states passed labeling laws, Congress finally passed the Bioengineered Food Disclosure Act (Disclosure Act) in 2016."

It says the USDA "charged with writing the implementing rules, finished them in 2019. Unfortunately, in its final decision, the agency fell far short of fulfilling the promise of meaningful labeling of GE foods. In fact, in many ways, the result is in the direct or de facto concealment of these foods and avoidance of their labeling."

*FoodSafetyNews, 7/29/2020*

## *IOIA's first Virtual Annual Meeting, March 4, 2021!*

The meeting will be hosted via IOIA's GoToMeeting platform, on a Thursday, in keeping with our Town Hall Meetings. The platform allows for up to 25 webcams at a time and up to 250 participants. This means every IOIA inspector member could potentially attend. Starting at 3 p.m. Pacific time will make the meeting accessible to Asia Pacific members while not too late for US/Canada East Coast members.

Plans for engaging discussion and exciting guest speakers are underway. The meeting will now be uncoupled from the ACA Annual Meeting/Training, scheduled the last week of January and the first week of February. IOIA and ACA are working together to plan that virtual conference, which will again be open to IOIA inspector members.

Tentatively, the IOIA will partner with ACA in 2023 for annual meetings and trainings in New Orleans, hopefully in a better post-pandemic setting. The ACA was already contracted to return to San Antonio, Texas in 2022. It is uncertain where IOIA will be for the annual meeting in 2022. Typically we rotate about every 3 years to Canada. IOIA's last annual meeting in Canada was in 2017 (our 25th anniversary).

**So Mark your Calendars! Interested in volunteering for AGM Planning Committee? Both Inspector and Supporting members are welcome. Contact [mscoles@rangeweb.net](mailto:mscoles@rangeweb.net)**

## *Disasters in Iowa and California - How You Can Help*

The Iowa Organic Association has many links to resources on their site to help and get help from the derecho that hit the state on August 10. <https://www.iowaorganic.org/>

CCOF is accepting donations to their Bricmont Hardship Assistance funds to help producers that have been affected by the wildfires in California. **100% of these funds go directly to organic producers.** CCOF does not take any admin fee, and **any organic producer (not just CCOF-certified)** is eligible for the fund.

<https://www.ccof.org/ccof-foundation/bricmont-hardship-assistance-fund>

A number of CCOF staff have also lost their homes:

Amy Lamendella - CCOF director of farm certification services (and IOIA inspector member). GoFundMe link: <https://gf.me/u/yti9ph>

Aerin Martin, CCOF Cert Operations Department, Compliance Supervisor. If you don't know her personally it's because her job is to keep everything humming in the background - so her invisibility is a testament to how fantastic she is. She also lost her home; this GoFundMe is for her and her family: <https://gf.me/u/yt772p>

Jacob Guth of CCOF also lost his home in the current round of CA wildfires.

[https://www.gofundme.com/f/rebuilding-jakes-losses-from-the-waddell-fire?utm\\_source=customer&utm\\_medium=email&utm\\_campaign=p\\_cp+share-sheet](https://www.gofundme.com/f/rebuilding-jakes-losses-from-the-waddell-fire?utm_source=customer&utm_medium=email&utm_campaign=p_cp+share-sheet).

If you can't make a donation, please share the fundraiser links to help spread the word.

# Organic News from Canada

## U.S.- Canadian Organic Equivalence Due for Review

The Organic Equivalence Arrangement between the United States and Canada, implemented in 2009, is due for review at USDA and the Canadian Food Inspection Agency (CFIA). The current equivalence in place allows NOP and Canadian Organic Regime (COR) certified products to cross the U.S.- Canada border without needing a double certification.

This review provides an opportunity for input regarding the terms of the arrangement and organic trade with Canada. More information is available at the [NOP website](#). OTA Newsflash, 7/29/2020

## CFIA Revises Import Policy for USDA Certified Organic

The Canadian Food Inspection Agency (CFIA) has revised their import policy for USDA certified organic products traded under the U.S.-Canada Organic Equivalence Arrangement (USCOEA).

As of April 30, 2020, all certified USDA organic products imported to Canada must be accompanied by an organic certificate that includes the following attestation statement:

*“Certified in accordance with the terms of the U.S. – Canada Organic Equivalency Arrangement.”*

This means that certifiers must verify compliance to the terms of the U.S.- Canada organic equivalence and include the attestation statement on organic certificates for USDA organic products exported to Canada.

For more information, visit the [CFIA website](#).

## Organic Connections Conference is Back On!

Organic Connections Conference is Going Virtual and will be held November 5 and 6, 2020! More info here: [www.organicconnections.ca](http://www.organicconnections.ca)

### Cancelled Certification Info

The Canada Organic Regime (COR) team has updated the layout and functionality of the CFIA webpage for Cancelled Organic Certifications:

[English](#)

[French](#)

## The 2020 COS review is launched

Funded with a contribution of Agriculture and Agri-Food Canada as announced August 24, 2019 in Mara, BC, and supported by Canadian industry partners, the Organic Federation of Canada has launched the review process that will culminate with the publication of the 2020 version of the Canadian Organic Standards by November 2020.

## State of Organics In Canada - Reports Available

Reports for 2019, 2018, 2017 are available, [follow this link](#) for more info.

## Canada and Japan expand organic equivalency to include livestock products

Canadian organic producers and processors will benefit from new trade opportunities and Canadian families shopping for organic food will have more choices following an expanded organic arrangement between the governments of Canada and Japan.

Effective July 16, 2020, the expanded Canada-Japan Organic Equivalency Arrangement will allow for Canadian certified organic livestock products and processed food products containing livestock ingredients to be exported to Japan. The arrangement recognizes Canadian and Japanese organic livestock standards as being equivalent.

For more info, please consult the [Equivalency arrangements](#) under the Canada Organic Regime page on the CFIA site.

### Guelph Organic Conference

<https://guelphorganicconf.ca>

Sep 07, 2020 Update · GOC will not be holding an in-person physical conference in January 2021 at the Univ of Guelph. During September & October they will be reviewing whether to offer a small menu of virtual programs/meetings.

## Self-Directed Learning Courses Now Available!

The IOIA Training Institute is pleased to offer organic inspection courses through our online Self-Directed Learning (SDL) program. **For full details and to apply, visit our site, [www.ioia.net](http://www.ioia.net).**

### Remote Inspection Training

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

Cost for the webinar: Free for all IOIA Inspector Members. \$200 for all non IOIA Inspector Members.

### Our Other Course Offerings

Qualifications vary by course, but all 200 level courses and higher require:

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

### 200 level Dairy Feed Audit

The 200 Level Dairy Feed Audit training is geared for livestock inspectors, reviewers and organic program managers. This course is focused on organic certification requirements to the NOP Standards.

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

The course includes five hours of recorded presentations, a pre-course and mid-course assignment, practice exercises and a final exam. Once started the course must be completed within 30 days. The course focus is organic certification requirements to the NOP Standards.

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

Cost for the course is \$300 for IOIA members, \$325 for non-members.

### 200 level IOIA/AGA Grassfed Dairy Inspection

This online course was developed by IOIA with the American Grassfed Association (AGA) to prepare experienced organic dairy inspectors to perform an "add-on" AGA inspection at the same time as an organic inspection, or as a stand-alone AGA inspection.

This course would also be useful in understanding the resources and activities related to any grass-based livestock operation. The course focuses primarily on dairy cattle. Participants will learn AGA meat standards, since some organic dairies may also want to sell cull females and male animals as AGA meat. Dairy farm transition, production and animal handling standards are discussed as well.

It is expected that performing these add-on inspections at the same time as the NOP inspection will take approximately an extra hour.

This course is presented by experienced IOIA Trainer Harriet Behar.

Cost of this self-directed course is \$350 for members and \$375 for non-members.

For more information, please contact [ioiaonlinetraining@ioia.net](mailto:ioiaonlinetraining@ioia.net)

## IFOAM North America News

### IFOAM NA launches new quarterly publication - Cultivated

Read more of the story in the premier issue of [IFOAM North America's new quarterly publication linked here.](#)

**Cultivated** is the first news and commentary media designed to help connect the organic community North America with the global movement.

Born out of the need for the organic movement to fill the broken cracks in the food system, **Cultivated** brings together some of the leading voices in the organic movement in a format designed to fill your imagination with a delicious new vision of the future.

As more and more parts of the global food system expose their vulnerability, smart and nimble small-scale farms are adapting quickly. While the giant meat packers, CAFOs and food service industry sputtered & faltered in the present pandemic, small farmers have rapidly adjusted their planting schedules, distribution channels and marketing opportunities. It's been quite a demonstration of grassroots resiliency.

Most importantly, this health crisis has pointed out the need for unity among us. In response to this need, IFOAM is erecting a big tent— one with room for everyone and a common firepit to sit around and share our stories.

Consider it a safe space to shelter-in-place.

With the launch of **Cultivated**, we've set up the tent poles, and there's the smell of fresh canvass and grilled veggies in the air.

*IFOAM NA press release, 7/27/2020*

IFOAM has revamped their website, check it out - <https://www.ifoam.bio/>

Think Globally!

## IOIA Scholarships - Deadline to Apply October 1

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.

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.

**The Deadline for returning Scholarship applications is October 1.** Scholarship recipients are notified by December 15.

Applications and instructions are available on our website, [www.ioia.net](http://www.ioia.net).

Completed applications and queries can be emailed to: [scholarship@ioia.net](mailto:scholarship@ioia.net)

## Ecuador training

La Agencia de Regulación y Control Fito y Zoosanitario AGROCALIDAD, es una entidad del Estado Ecuatoriano adscrita al Ministerio de Agricultura y Ganadería encargada del control y regulación para la protección y el mejoramiento de la sanidad animal, sanidad vegetal e inocuidad alimentaria. Dentro de sus competencias realiza el control y vigilancia de la producción orgánica en toda la cadena productiva a través de inspecciones programadas anualmente a operadores orgánicos; control de mercado de productos orgánicos tanto en supermercados y ferias; monitoreo de sustancias prohibidas en productos orgánicos; inspecciones de reducción del período de transición, procesos de capacitación, evaluación de insumos que se permiten en la producción orgánica y estadísticas de la producción orgánica cumpliendo con los lineamientos dispuestos en la Resolución Técnica N° DAJ-20133ec-0201.0099 el Instructivo de la Normativa General para promover y regular la Producción Orgánica – Ecológica – Biológica en el Ecuador, vigente desde el 30 de septiembre de 2013 así como sus normativas complementarias.



La producción orgánica en el Ecuador representa el 0,89 % de las tierras agrícolas del país, con 14127 productores responsables de 52444 ha certificadas, convirtiéndose en un sector de atención importante, no solo porque es una opción económica de acceso a mercados nacionales e internacionales por su calidad y atributos, sino porque, además concentra a 13844 pequeños productores, muchos de ellos de la agricultura familiar campesina en 69 grupos, ofreciendo beneficios sociales, ambientales, económicos y a la salud humana, siendo una alternativa para combatir la inseguridad alimentaria debido a que son un componente importante en una dieta sostenible y saludable.

AGROCALIDAD para ejecutar sus procesos en territorio, tiene establecido todo un proceso para la formación y evaluación de sus inspectores tanto de esta institución como de Agencias Certificadoras acreditadas en el país.

Con estos antecedentes, AGROCALIDAD con el apoyo de la Cooperación Alemana al Desarrollo (Deutsche Gesellschaft für International Zusammenarbeit – GIZ con sus siglas en alemán), y de la Asociación Internacional de Inspectores Orgánicos (IOIA siglas en inglés) organizó los cursos-taller virtuales de Trazabilidad (del 06 al 09 de julio del 2020) y Balance de Masas y Certificación Orgánica de Grupo de Productores (del 13 al 16 de julio del 2020) bajo la tutoría del Ing. Luis Brenes MSc, consultor experto de la empresa AgriVita S.A. de Costa Rica.

El mencionado taller contó con la participación del equipo de la Dirección de Orgánicos así como de los inspectores orgánicos oficiales de AGROCALIDAD, dando un total de 25 técnicos funcionarios de la mencionada institución. De esta manera se logró fortalecer las capacidades técnicas de los inspectores en análisis de masas, fraude e inspección de grupo de productores, mejorando los procesos de vigilancia y control de los operadores orgánicos y garantizando la idoneidad de los productos orgánicos.

## Remote Inspection Training in Spanish

Following the success of IOIA's English language Remote Inspection Training webinar on June 1, with 89 participants, Spanish language training followed on June 26 with 84. Garth Kahl, IOIA Trainer, delivered both the English and Spanish webinars, with the support of bilingual Board members Lois Christie and Philippe Descamps on the Spanish language training. Both trainings were offered as an IOIA membership benefit. The training was free to IOIA inspector members, so IOIA enjoyed a significant jump in members who joined with the training, including those in Latin America. Participants included independent contract inspectors, and certification staff (administrators, reviewers, and inspectors).

The training is also available in a self-directed format, with a website [www.ioiavirtualinspections.com](http://www.ioiavirtualinspections.com) that includes recordings of the webinars. The self-directed format proved as popular as the live webinar, with 84 people registered so far, including a significant number from Australia, where time zones are challenging for IOIA's typical webinar delivery times. Inspectors can register, listen to the webinar and review the website resources, and take an exam, all at their own convenience. Certificates are generated within 24 hours and delivered by email for anyone earning a passing score (75% or better) on the exam. Some certifiers are requiring the training, some have assisted with partial registration fees, and at least one is paying a bonus on each inspection invoice if the inspector has taken the training. The choice of delivery brings the total of people trained to 250+ in just a few months, since the idea was developed by the Town Hall organizing committee. To read more or to register, see page 10.

## LOL trainings

Since the initial launch of the Live Online program on April 2, IOIA has delivered 8 courses in crop, processing, and livestock scopes.

As everyone gets accustomed to both teaching and learning on the platform, we continue to improve the tech side of things. Our trainers also continue to update course materials and deliver high quality training. Participant evaluations consistently note the excellent level of instruction and materials.

Reformatting established IOIA trainings to fit a web-based platform was a challenge that required long hours of reviewing and redesigning materials. In addition to these updated materials, Live Online courses incorporate discussion rooms for participants to work together, interactive exercises, recorded presentations, and virtual inspections.

We are pleased to be able to offer five Live Online courses this fall, starting in September. See page 3 for details and deadlines, or go to our website, [www.ioia.net](http://www.ioia.net)

Thank you again to our fabulous Trainers: Luis Brenes, Jonda Crosby, Garth Kahl, Corinne Kolm, Garry Lean, Nate Powell Palm and Margaret Scoles.



## Volunteers needed! IOIA's Membership Committee

Due to some recent resignations and inspector retirements, Eric Feutz, Membership Committee, needs some help and some company. The duties of this Committee are:

- Assist the development of Membership services.
- A key duty is to manage the annual Nomination process for the Board of Directors and assist in developing new leadership from the membership. This Committee has the duty of finding nominees for the Board of Directors or the upcoming elections at least 60 days prior to the annual membership meeting.
- Advise the format and publication of the Membership Directory (actual publication is mostly managed by IOIA staff).



If you are interested in knowing more or if this sounds like a fit where you could contribute – please contact Eric at [ebfeuz@gmail.com](mailto:ebfeuz@gmail.com) or the IOIA office [ioia@ioia.net](mailto:ioia@ioia.net).

## Human Capital, from page 1

vidual or population, and is generally considered one of the most important intangible assets that contributes value to an organization or community.” Dr. Tucker goes on to say, “As a public-private partnership, organic certification is a shared responsibility across the organic community, making the effective management of human capital an essential element of success in protecting the USDA organic seal.” Inspectors are glad to see that reviewers are addressed along with inspectors both in this memo and in the Strengthening Organic Enforcement proposed rule.

We have always known that inspectors are important, but we are too often invisible, undercompensated, and undervalued. The time has come to reinvent the profession. What is the issue and why such a priority right now? We are facing a potentially critical impending crises in the number of available inspectors who are qualified, trained, and ready to do inspections on the scope and scale needed. IOIA was already sounding the alert last year in conversations with certifiers. That was pre-Covid. Covid-19 has accelerated and accentuated the alarming fact – we are not making new, qualified inspectors as fast as they are needed to match the growth in the sector. Experience is exiting faster than new talent is becoming inspection-ready on the scale needed. Sales of organic products are booming and expectations for inspectors keep rising. In the U.S. the trajectory of the pandemic has kept many inspectors at home. Certifiers are noting backlogs and are scrambling to meet the needs of their clients. The USDA-NOP is not an easy regulation to change. Some other international standards are allowing for remote inspections for new applicants. However, in the U.S. the NOP has made it clear that the initial inspection must be onsite. Some certifiers have stopped accepting new applicants because there are too few inspectors to go onsite. Finding a local inspector who can complete the inspection without overnight stays or travel away from home is ideal but daunting in reality.

The dimensions of human capital - as listed in the Memo and referenced from the Office of Personnel Management’s Human Capital Framework include:

- Strategic Workforce Planning
- Talent Management: Pipeline Development
- Talent Management: Recruitment & Matching
- Performance Management & Evaluation
- Professional Support and Educational Infrastructure

Put another way, the issues are (1) Attracting the right talent. (2) Retaining experience. (3) Mentoring new talent. (4) Professional support and continuing education.

### Attracting the right talent

IOIA does little active recruitment. We’ve been “driving with the brakes on” since 2000 when the NOP organic rule was published. Word of mouth and website training schedules worked fine. We wanted to train enough well-qualified individuals but an over-supply of inexperienced inspectors was unfair to them and to the sector. That seemingly never-ending supply of new talent has slowed to a trickle. This is not due to Covid, but was accentuated by it. In-person basic training stopped; the number of people trained went down about 15%, and shadow and apprenticeship opportunities slowed. It is hard enough to send an inspector to do an onsite inspection without adding an extra person. The flow of new entry level inspectors had already slowed considerably after high profile fraud cases in recent years made our profession less attractive. Demand for IOIA basic training has historically been connected to the job market. If college graduates had trouble finding a job, unemployment was high, or the economy was failing, we had lots of willing entry level applicants. The job market, until Covid, was tight in the US, so fewer applicants was predictable. Farmers often express their frustration with inspectors who have no actual agricultural experience. Handlers say the same. But just knowing the industry does not make a good inspector. Personal attributes and skills such as curiosity, ethics, good communication, time management, and professionalism can make the difference between success and failure. For example, a common complaint from certifiers is that reports are not submitted on time or the inspector doesn’t respond promptly. Many new applicants simply don’t realize how hard this job is.

### Retaining experience

The current environment does not necessarily reward experience. New inspectors may be cheaper, more willing to take on unreasonable work assignments, and, well let’s say it out loud - “younger”. Several factors are working against us. Because there is little differentiation in pay for experience, there is a steady pull for inspectors to take



## Human Capital, continued

full time administrative jobs (i.e. certifiers, NOP) with benefits or to start consulting or training at a much higher pay/hour. The most experienced inspectors tend to be those who have been inspecting for 15 to 30 years. Certification in the US is about 50 years old, but most inspectors started inspecting within the last 30 years. As they reach retirement age, some are choosing to stop inspecting or cut back. Covid risk is higher with age. Inspectors who have historically been on the road all year long are now working only from home, doing remote inspections. Some full-time inspectors say they'll never go back to the grueling road trip schedules associated with making a living doing on-site inspections. Many report that they find remote and hybrid inspections effective and satisfying, not to mention more carbon-sensible.

### Mentoring new talent

In response to the need for formal field training/apprenticeship, IOIA initiated Field Training in-person four years ago. Since then the training has been offered in all three scopes, but response in numbers enrolled has been unimpressive. Entry level inspectors are challenged to arrange their own informal apprenticeship, but they have historically been able to do this at little or no cost. They are loath to pay for yet another training after basic if they can find a way to do it one-on-one. Mentors are scarce and often not paid. Some experienced inspectors say they have experienced having apprentices take their work after they trained them.

A recent participant at an IOIA basic course wrote to say this, *"Initially the biggest hurdle I was running into was the apprenticeship requirement. I understand that requirement for new inspectors, but it makes it difficult for experienced auditors/inspectors to make a lateral move into organics. I've been auditing to various standards for over a decade. As a business owner, it's tough to justify the cost of travel and time for an unpaid apprenticeship, especially when you have to search out and find another inspector willing to do it (and the reason I went down the inspector path was because there are no inspectors anywhere near my area)."*

### Professional support and continuing education

The idea of an inspectors' cooperative structure was discussed at our 2020 AGM. There was a good deal of enthusiasm for it, but pandemic and remote inspection training drew away the focus. Has its time come, finally? This could be a structure outside of IOIA, started with IOIA and spun off to its own organization (nonprofit or for profit). It could include mentoring and/or credentialing with different levels according to experience and qualifications. A current focus and energy within IOIA right now is mentoring (see Notes from the Chair). Could this structure or credentialing program or both create the way to differentiate experience and qualifications and to see that it is rewarded appropriately? The concept is not currently of a co-op, or a union; the structure is yet to be determined.

Read the memo. Engage in the dialogue, whether that is through the IOIA Town Hall, by writing the NOSB to address the questions raised in the memo, or writing comments to the Proposed Rule, especially that related to inspector qualifications and training – due October 5. If the profession of organic inspection is about to be reinvented, inspectors should be heard loud and strong. ☞



## US – Thousands of Farmers Sign Congressional Call to Action on the Climate Crisis

The National Sustainable Agriculture Coalition (NSAC) recently delivered a letter with over 2,130 signatures from farmers and ranchers across the country to the House Select Committee on the Climate Crisis.

Signatories of the letter shared stories of how climate change affected their lives and spoke of their commitment to be part of the climate solution. They urged legislators to continue their work in Congress to support programs and increase conservation incentives to help farmers and ranchers actively mobilize against the climate crisis. Check out what their farmer panelists had to say and learn about what actions you can take [in the NSAC blog](#).

## **NOP PROPOSED RULE – STRENGTHENING ORGANIC ENFORCEMENT**

**[Docket Number AMS-NOP-17-0065; NOP-17-02] – Comments due by October 5**

### **Condensed from the supplement to the proposed rule language**

*This proposed rule would strengthen oversight of the production, handling, certification, marketing, and sale of organic agricultural products as established by the Organic Foods Production Act of 1990 (OFPA). Proposed amendments will close gaps in the current regulations to build consistent certification practices to deter and detect organic fraud, and improve transparency and product traceability. Today's global organic marketplace is marked by a multifaceted supply chain with organic products increasingly sold and handled by entities not regulated by the USDA. The absence of direct enforcement authority over some entities in the organic supply chain, in combination with price premiums for organic products, presents the opportunity and incentive for organic fraud, which has been discovered in the organic sector by both the NOP and organic stakeholders. These amendments are designed to mitigate the occurrence of organic fraud. Stakeholders have repeatedly called for the NOP to take steps to improve oversight of organic systems and enforcement of the USDA organic regulations. Commonly cited areas for improvement include certification of excluded handlers, organic import oversight, fraud prevention, organic trade arrangements, and organic inspector qualifications. The amendments in this proposed rule are intended to: (1) strengthen organic control systems; (2) improve organic import oversight; (3) clarify organic certification standards; and (4) enhance supply chain traceability.*

This is the most extensive proposed rule change since the original publication of 7 CFR 205 in year 2000. Proposed implementation period is 1 year after publication of Final Rule. This article summarizes the main provisions of each of the topics addressed in the rule and identified by IOIA's Policy Committee as having the most impact and relevance to inspectors. The Policy Committee is preparing IOIA's comments and has surveyed the membership on key points. The 19 topic areas were sorted and winnowed down to the following list for subcommittees. The list focuses on those issues of greatest relevant to inspectors and retains the associated topic number from the Proposed Rule. Other topics are of greater interest to certification agency staff (i.e. submission of data to NOP, adverse actions, settlements, international equivalence).

The 2018 Farm Bill required USDA to (1) Reduce the types of uncertified entities in the organic supply chain that operate without USDA oversight—including importers, brokers, and traders of organic products, to safeguard organic product integrity and improve traceability. (2) Require the use of NOP Import Certificates, or equivalent data, for all organic products entering the US and (3) Clarify NOP's authority to oversee certification activities, including the authority to act against an agent or office of a certifying agent, such as foreign satellite office of certifying agents.

#### *IOIA Policy Sub-Committee Areas.*

1. Exemptions and Exclusions; Certificates of Organic Operation
2. Imports to the US
3. Personnel Training and Qualifications
4. Supply Chain Traceability & Organic Fraud Prevention
5. Grower Group Operations; Unannounced Inspections; On-site Inspections
6. Lot numbers on non-retail containers; Calculating the % of Organic Produced Ingredients; and Technical Corrections



### **1—Applicability and Exemptions From Certification**

Reduce the types of uncertified entities in the organic supply chain that operate without USDA oversight—including importers, brokers, and traders of organic products. Most notably, this includes exemptions only for retail operations, entities that only store organic products, and for transport. Anyone who combines loads is a handler. Private label certification may still need to be further clarified. Summary of changes:

- **New expanded definitions – handler, handling – includes brokers, traders, anyone who buys/sells or facilitates the sale of organic products.**
- **205.100(a) and 205.201(c) shortened and 205.101(a) becomes much shorter and the only exemption is ≤\$5000.**

## NOP PROPOSED RULE - STRENGTHENING ORGANIC ENFORCEMENT

- 205.101(b) becomes much shorter. The only exclusion becomes retail. “Remains in the same container” is removed.
- 205.101(d) added and addresses <70% organic ingredients.
- 205.101(e) added and clarifies that an entity that only stores or loads doesn’t have to be certified.
- 205.101(f) added – addresses records.

### 2—Imports to the United States

This proposed rule would require that any organic agricultural product imported to the U.S. be associated with a valid NOP Import Certificate or equivalent data source. Currently, NOP Import Certificates are only required for organic products imported from a country that the NOP has determined uses an equivalent system of organic certification, e.g., NOP Import Certificates are currently used for imports from the EU, Switzerland, Japan, and South Korea. The proposed rule includes two new terms, **organic exporter and organic importer of record**. Additionally, certifying agents must notify the NOP upon opening a new office. In April 2020, NOP and US Customs and Border Protection (CBP) partnered to launch electronic organic import certificates within CBP’s primary import system, known as the Automated Commercial Environment (ACE). These certificates are currently available for use, but not yet required.

### 3—Labeling of Nonretail Containers

Proposes that that nonretail containers used to ship or store organic products are labeled with two additional pieces of information: (1) A statement identifying the product as organic; and (2) the name of the certifying agent that certified either the producer of the product, or, if the product is processed, the last handler that processed the product.

- 205.307 is dramatically expanded
- Lot number becomes a must for processed products
- “COB” statement and name of certifier becomes a must for non-retail containers used to ship or store organic products.

### 4—On-Site Inspections (Unannounced Inspections, Mass Balance, and Trace-back)

The current regulations allow for, but do not require, unannounced inspections. NOP Instruction 2609 (2012) recommends that certifying agents conduct unannounced inspections of 5 percent of their total certified operations per year as a tool in ensuring compliance with the regulations. This amendment would make these inspections a regulatory requirement.

Finally! The regulation would require that certifying agents must verify that the quantity of organic product sold does not exceed the quantity of organic product that is produced or purchased. Second, AMS proposes a requirement that certifying agents verify that organic products and organic ingredients are traceable from the time of production or purchase to the time of sale or movement of product from the operation and vice versa. These new verification requirements are also referred to as “mass-balance” and “trace-back” audits. Here’s the language:

	Redesignate as	
205.403(c)	205.403(d)	<i>Verification of information.</i> The on-site inspection of an operation must verify:
205.403(d)(4)	Add	That sufficient quantities of organic product and ingredients are produced or purchased to account for organic product sold or transported; and
205.403(d)(5)	Add	That organic products and ingredients are traceable by the operation from the time of production or purchase to sale or transport; and that certifying agents can verify traceability back to the source per § 205.501(a)(21).

Continued on page 18

## NOP PROPOSED RULE - STRENGTHENING ORGANIC ENFORCEMENT

### 5—Certificates of Organic Operation

The proposed rule would require certifiers to provide organic certificates that are uniform in appearance and that certifying agents create and provide organic certificates that are generated from the Organic INTEGRITY Database (OID). This would end the wide variability in the content and style of certifier-generated certificates. Certifiers would still be able to add additional addenda. Note, however, there is no requirement of acreage reporting, which many certifiers are promoting. IOIA has not yet taken a position.

### 6—Continuation of Certification - did not make the list of topics for the Policy Committee - but proposes a welcome change, if it makes the final rule.

Some certifying agents require that certified operations submit an organic system plan (OSP) in its entirety every year, while other certifying agents only require that operations annually submit revisions to the OSP. This proposal would clarify that operations are only required to submit sections of the OSP that have changed will eliminate unnecessary paperwork without compromising oversight of organic operations. This is consistent with the Program Handbook (Instructions NOP 2615 and NOP 2601).

**8—Personnel Training and Qualifications - the most burning issue for inspectors.** Prescriptive language issues training, qualifications, and addresses field evaluation, which is already in the NOP Program Handbook as Instruction 2027 (most recently updated in 2017).

#### Dramatically expands 205.501(a)(4) for inspectors

- **Minimum of 20 hrs. of continuing ed/year (includes OILC, certifiers, or “other relevant training provider”).** It is not clear whether this requirement is per scope.
- **Minimum of 1 year of field-based experience related to both scope and scale.** Concerns have been expressed by IOIA members as to what “field-based”, “scope”, and “scale” mean. This proposed rule identifies rather arbitrarily three numerically-easy-to-assess characteristics of a qualified inspector/reviewer while failing to address all of the other essential attributes and skills of inspectors/reviewers.
- **Similar for reviewers** -except not 1 year of related field experience
- **205.501(a)(5) expanded** - Certifiers need to show that both inspectors and reviewers have formal education, training, or professional experience in the fields of ag, science, or organic production and handling that “directly relates to assigned duties”.
- **205.501(a)(6) Certifiers must observe inspectors in the field at least every 3 years “or more frequently if warranted”.**
- **On-site evaluation must be performed by certifying agent personnel who are qualified to evaluate inspectors.** IOIA’s question – are only certifier personnel qualified to conduct these evaluations? IOIA’s well-respected Peer Evaluation Program has been accepted by the NOP for years. Clarification may be needed.

### 16—Grower Group Operations

It is important to address Grower Groups into the Rule. NOSB recommendations and an NOP memo from 2011 are currently all that certifiers have.

- **FOUR new definitions!** Including ICS - Internal Control System
- **Adds 205.201(c)** - lengthy!
- **Adds 205.400(g)** to explain in detail what grower groups need to do.
- **GGs cannot be used for livestock products** - crop or wild crop only. Not honey?
- **Adds to 205.403 language that gives prescriptive numbers** - 1.4 X the square root of total number of members
- **Must inspect all high risk.**



Photo courtesy of Luis Brenes

## NOP PROPOSED RULE - STRENGTHENING ORGANIC ENFORCEMENT

### 18—Supply Chain Traceability and Organic Fraud Prevention

- **New definition “Organic Fraud”** - defined as intentional deception for illicit economic gain.
- **Expands 205.103 but without dramatic changes.** Organic operations must maintain audit trail documentation to facilitate supply chain traceability, including identification of products as organic on documents. **Clarifies that all documents and products should have “organic” on them.**
- **Expands 205.201(a)(3) to require fraud prevention plans.** Proposed language: *A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented. This must include a description of the monitoring practices and procedures to verify suppliers in the supply chain and organic status of products received, and to prevent organic fraud, as appropriate to the certified operation’s activities;*
- **Expands 205.501(a)(10) regarding confidentiality and the sharing of information between certifiers.** Certifying agents must share information with other certifying agents to verify supply chains and conduct investigations (§ 205.501 and § 205.504)
- **205.501(a)(21) – new! would add that certifiers must annually conduct risk based supply chain audits.** Certifying agents must have procedures for (1) identifying high-risk operations and agricultural products to conduct risk-based supply chain audits and for (2) reporting credible evidence of organic fraud to the USDA.



IOIA members are encouraged to submit comments. Comment period ends October 5. Go to the **Federal eRulemaking Portal** at <http://www.regulations.gov>. You can access this proposed rule and instructions for submitting public comments by searching for docket number, AMS-NOP-17-0065. IOIA’s Comments will be circulated to members in advance of the deadline, as a resource to you in making your own comments. Many voices matter! IOIA is one voice and we collectively represent the members, but individual comments, even if they are short and focus on one or a few topics, helps amplify the inspector’s voice. If you have not commented before, please feel free to contact [mscoles@rangeweb.net](mailto:mscoles@rangeweb.net) for help in how to do it. You can type your comments directly into the text box, or upload Word or PDF documents.

**Comprehensive Supporting Documents, including a link to the full Proposed Rule, are posted on the NOP Website at**

<https://www.ams.usda.gov/rules-regulations/strengthening-organic-enforcement-proposed-rule>

Links to selected resources at this site –

- [Side-by-Side Comparison \(current regulations to proposed rule\) \(pdf\)](#) Updated 7/30/2020
- [Fact sheets: Safeguarding Organic Supply Chains \(pdf\)](#)
- [Infographic: Retail Exemption Flowchart \(pdf\)](#) Updated 7/30/2020
- [Infographic: How to Submit an Effective Comment \(pdf\)](#)
- Informational Webinar (July 8, 2020): [Recording, Slides and Chat](#)



## Low-tech No-tech Remote Inspections

INTERVIEW with Rachel Cherry Myers,

IOIA board member and the inspiration behind IOIA's remote inspection training website

*Margaret Scoles: What's it like to do remote inspections in a pandemic for operators that are either low-tech or no-tech? Have you done inspections where you were not physically in the same place as the operator or where there was no physical contact?*

Rachel Cherry Myers: They're most of my inspections. I've done onsite/no contact where I have permission to walk around the farm and then ask the operator to leave their paperwork somewhere. I photograph all the paperwork and do a whole bunch of it onsite and then call the farmer in a couple of days or the following week and finish the interview portion and go over the paperwork with any questions. I've also done full remote where we've done everything from the tour to the documentation, all over the computer.

*MS: You've used a computer to see an operation that doesn't use a computer at their end. How did you do that?*



RCM: I did an Amish farm one time; he had a computer come in. There are the no-tech like the Amish and other plain people. And then there's the low-tech who are people that have the capability but maybe don't have a lot of skill or equipment of their own. Lots of times it's the wife who sets everything up and has the iPhone and does the videos. Sometimes the kids.

*MS: So, it isn't all plain people then where you've had these low-tech inspections?*

RCM: No, for sure. I've dealt with some very large processors who are insecure about the technology or don't have good cell phone service. With those operations we'll usually do videos and they'll have them prerecorded right before the inspection. The big processing facilities often have a large amount of steel in the building itself, and it really messes with reception. So, there's often very poor cell phone service there, or even WIFI, in the manufacturing areas anyways. If it's really bad, with the agency I've been working with, we'll do trades. I'll do operations that prefer and are capable and can do more high tech inspections. Inspectors who prefer to go onsite will do those. A majority of the inspections I do have been people who just aren't comfortable with the tech. It might take a little longer, but we get thru it.

*MS: I was surprised with one of my first hybrids. I made an assumption about the producer, that because he was a large high-tech farmer, that would extend to high-tech computer technology. He had 2 computers. The one that had Quick-Books couldn't share screens and wasn't hooked up to WIFI, and he had a poor quality webcam. Screen-sharing documents wasn't working at all. Finally, he just started texting me everything. It was amazing; we never used the online meeting at all. He just took a photo of everything and texted it. It was so much more effective than having him put all those documents in Dropbox where I didn't know how long it would take him to find those documents or manufacture them if he was cheating. He was just taking pictures and sending them to me one after the other so I knew they were real.*

RCM: I find the best way to deal with most farmers is having them just text stuff. I have them text me their name first; otherwise I have bits of confusion - Who is this? Why am I getting this? [laughter]. I had one guy, "I don't have video, no iPhone, I can't do Facetime", so he Facebook friended me so that we could do messenger videos. There's a lot of different ways to do it. Most farmers, though, even if they're low-tech, they've got a phone that can take photos and they're much more comfortable with that. And I have been using CamScanner. I'll just turn them all the photos into a pdf and it works super well. I ask for documentation before I do the inspection. What I've been learning with scheduling is that I like to get it the day before. For something like seed tags or invoices I'm not terribly worried about them manufacturing documents. They'd have the time to prepare for me to come onsite anyway. Then, I give myself, depending on the operation, time right before the inspection to do a lot of the paperwork and review and format stuff. Then once I join in with the farmer, we're able to review paperwork. Some of the data entry stuff is, here's an invoice with their name. It's nice because it's not like 'mom where's this receipt, I can't find it?' They have to be more prepared than if I were there in person.

*MS: You do less waiting, it seems like.*

RCM: And they do less waiting. Because all the data entry and those parts of the report, they sit there and watch you, and they don't really need to watch you enter this information into your computer.

*MS: Do you use one platform or multiple platforms depending on what they're familiar with? Could you give us an idea of your preferred platforms?*

RCM: I like Dropbox a lot. I had GoToMeeting. I was frustrated with it so I switched to Zoom and I'm more frustrated with

**Low-tech No-tech Remote Inspections**

INTERVIEW with Rachel Cherry Myers,

IOIA board member and the brain behind IOIA's remote inspection training website

Zoom, so I'm going back to GoToMeeting, with text messaging and Dropbox. Emails can be difficult in that your emails just get clogged and sometimes by the time you have the inspection you've got 400 emails between the time they sent it, it's just difficult for me to manage.

*MS: Plain people don't use email and they don't have phones. Are you doing anything differently? Like hard copy mail?*

RCM: So far, most of the operations that I've had, most Amish have access to a phone. I have done a bunch of Mennonite community inspections. They have access to a phone so I was able to call them and discuss the plan with them and ask permission. It was really important to make sure they were really comfortable with somebody walking around the farm by themselves. And then I sent them a letter with all the stuff listed – which I think I'm going to keep doing after this because they were so organized, they had everything that I asked for, it was amazing. And then I just put in there two dates – here's the date I'm going to do the onsite and then here's the date and time for the phone follow-up. It ended up taking me longer to do. Probably not terribly longer but it's different. Not so much longer as a whole if you do them close together. But with the learning curve, I wasn't always able to do it close together. So, then the more you have to remind yourself of what you saw and the paperwork you already reviewed, the longer it took. But it was nice because by the end of their interview you're pretty much done.

*MS: What I enjoyed was having the draft report written before the exit interview. How is the producer's initial reaction when you first contact them about these remote inspections? Are they apprehensive, are they relieved that you're doing it?*

RCM: I try to keep things positive. I try to keep people laughing through all this. By the end, every once in a while everybody's frustrated, they're frustrated or I'm frustrated. But for the most part I think the initial reaction is maybe a little bit of fear. I haven't had anybody that's been rude to me or made me feel bad about not wanting to go onsite. I've had a lot of just really nice people cooperating with me about it and they get it done. I haven't had any failures so far.

*MS: And these are inspections where you have had no physical contact, no shaking of hands, no giving them a business card, no them handing you documents? It's all been arranged so you didn't actually have direct physical contact?*

RCM: Yeah, I don't think even, maybe once somebody handed me a document, maybe.

*MS: That's pretty impressive. Do you feel like the inspections were as thorough?*

RCM: They're different. It's sort of the same as when we talk about part of the reason we send different inspectors, because if every inspector was as neurotic about certain things as I am, you know about every single thing, right, we all have our strengths, we all have our weaknesses as inspectors. And these inspections have their strengths and their weaknesses. From a paperwork standpoint, especially with larger and more complicated operations, we never have enough time. And rarely do we spend more than a day onsite. So, for some of the more static information, they might manipulate it but you're coming anyways so they're going to manipulate it onsite. Then it's better because you actually have the time to review it. I'm on the fence about the audit exercises. What I really like doing is the day before the inspection, saying 'so we meet at noon, let's go over the audit exercises, I want this in my inbox by the end of the day today. Or in Dropbox by the end of the day. And then I'll start the inspection a little later the next day and I actually have time to sit with the documents without that pressure of somebody looking over my shoulder. And I often will have confusion and need clarification. But I've never liked it when they just sit there and tell you what's going on. If I can't figure it out mostly by myself, you're probably not doing what you need to be doing.

*MS: Yes, if you need the operator to explain everything to you maybe it's not a good audit trail. I was curious about the audit. I wondered if you got the documents in advance and how much time in advance.*

RCM: I try not to do it much more than 24 hours, that is stretching it to me. With some of these really small processors I ask for all their invoices because if they've got corn and they've got soy they'll have 5 weigh tickets. I just ask for all their sales and I'll pick whatever I want and I'll do some of the traceback, but it's because I already have all their records, there's not anything else they're going to send me.

*MS: You must have some interesting stories about what you've encountered with remote inspections.*

RCM: My favorite one is the one where I did a Zoom meeting with the Amish dairy farmer. They paid someone to come in and be the tech person at their end. For the first 4 seconds, he was sitting off to the side so I couldn't see him in the camera but very quickly, 'I said, "XXX can you see me?" and he'd peek his head around and

*I know what I can  
do onsite...  
this is just a  
different ballgame.*

**Continued on page 25**

## Board of Directors Minutes Highlights

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

### April 20, 2020 - 4:00 p.m. EDT Via GoToMeeting

**Board Members Present:** Lois Christie, Janine Gibson, Ryan Sitler, Heather Donald, Chuck Mitchell, Rachel Cherry Myers, Philippe Descamps. Also present - Margaret Scoles, ED

**Annual Meeting Minutes & BOD Business Meeting:** During the review of the AGM minutes: MS noted that international IOIA scholarship recipients are now able to take Basic trainings more easily via the Live OnLine training. Motion is made by Janine to approve the 2020 AGM minutes as amended accepting grammatical corrections and clarifications for posting on the website in DRAFT form. Passes unanimously. Motion is made by Janine to approve the 2020 BOD Retreat Business Meeting minutes as amended. Passes unanimously.

**2021 AGM Planning & Format:** The BOD reviewed options for the AGM. RS - A smart thing to do organizationally could be to commit to hosting the 2021 AGM remotely – we know we can do it, takes into consideration of the unknown (COVID-19), and insulates us financially. MS – We can have 250 people on a GoToMeeting call, so literally every member could participate. We had 36 members at our 2020 AGM. If we can get 60-100 people to participate in the virtual AGM, that's a reason in itself to take advantage of this opportunity. MS - Would like to keep on the table the idea of having a second board meeting next year (2021). General agreement by all present to plan for a virtual AGM, and to later decide if we will host an in-person Advanced Training or just a social event. Motion is made by Ryan to commit to scheduling IOIA's AGM for 2021 in a virtual setting as opposed to allowing the unknown with COVID-19 to dictate our plans at a later date, and if we are able, IOIA will host a gathering in New Orleans in January in conjunction with the ACA training. Passes unanimously.

**Treasurer's Report:** Running about \$50,000 short on original budget for Quarter 1. Quarter 1's shortfall is mostly from not collecting on the in-person trainings that had to be cancelled. MS and RS met to discuss setting the price for the Live OnLine training courses. There is less expense involved (no trainer travel and travel days, no meals or lodging) in LOL training, but also running smaller groups ( $\frac{1}{2}$  to  $\frac{2}{3}$  the size). The more often they are run, the more the net profit improves since a lot of the expense is in the initial development (developing the virtual field trip and a ton of Jonda's time). Motion is made by Heather to approve the First Quarter Treasurer & Financial Reports. Passes unanimously.

**Review of AP Ventures Contract for OILC:** MS met this morning with Lisa Spicka and APV. The client is NOP, the contractor is AP Ventures, and IOIA is the sub-contractor. IOIA will communicate only with AP Ventures. There is already a press release created by NOP to announce the project. This project needs to be completed by Aug. 31 and Lisa will be managing it. CM – How will we match inspectors with the work? We need to have a process that is fair and open. MS – We'll have to have an application process. There will be different levels of competence and qualifications needed for the different jobs required by the project. We want to get the most money to the most qualified and needy of the work. Lisa is going to write up short RFP's for each of the roles people could have. Motion is made by Janine to empower MS to sign the contract on behalf of IOIA. Passes unanimously.

**IMS Contract and Moving Forward:** Recommendation is to do it, but with some hesitation. LC – it's a hard time to invest, but it's important investment for IOIA's future. JG – And credentialing is only going to become more important. RCM –it may be better to wait until long term goals are more clearly developed. We would then have a better understanding of the system we need in the long term, and we could be slightly premature in moving forward with the system before then. We should still move forward with logistics of credentialing program. We should move forward with credentialing and membership, but pause the IMS to make sure it fits with the programs (credentialing, member development, etc.) and not the other way around. MS - ACA had previously dismissed the idea of prioritizing credentialing, but it may be worth talking to them about it again. RS – the project isn't credentialing, but credentialing is an eventual part of the system. The speed at which IOIA is developing virtual and tech-based systems for our industry has him second-guessing delaying the IMS project. So many components of a system like this that address what we've identified as long-term goals and challenges of our organization. First reaction at the outset of these hard times was to not move forward and spend this big chunk of money, but the more I discussed it with MS, the more we convinced ourselves that this was the time to be implementing it. The development of the system in the beginning is expensive, but the potential add-ons in the future are not problematic to add in. JG- Respecting RCM's comments, going forward with the project now is an investment that will save us staff time and other issues in the long run and support our organization. RCM – Totally agree if it's easy to make changes. MS –it may be possible that we can get a cheaper project this year. Maybe we can just do that much – move our information into the bones of the new system. Not worry about credentialing at all. It will be a new website, a new way of handling money, a new way to handle membership. Ask him to pare down the project for this year, and push more of it into next year. HD – Agree that it is a difficult time for investments, but this is an important project, especially

## Board of Directors Minutes Highlights

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

given the current circumstances and how much more technology is being used. Having a system that is efficient and will work for IOIA is important. From personal experience, has gone through multiple database changes. The most crucial things I've observed are having the ability to make simple changes in-house and having a developer that is easy to work with and responsive and doesn't charge huge amounts to make changes. MS – I don't think you need to vote since we have a signed contract, but I'd like to clarify that this project might not be able to cost less than \$65,000. Ask him to look at what's feasible to do for that amount, and even less would be great. General agreement of the BOD to move forward with the contract, but MS will talk with Bryan about paring the work down to make sure that 2020's cost is not more than \$65,000.

**Asia Pacific Committee:** CM and MS attended the April 20 meeting along with about 6 others. Most of the meeting was everyone giving COVID updates for their countries – everyone is in lock down and inspectors are not going out. They talked about doing online training like what we're doing in North America. Some remote inspection work is going on in the AP region. Kathe would like to set up structured mentoring for local inspectors – have an experienced inspector working from their office with a less experienced local inspector. There's a lot of certification in the islands that haven't built up their local inspector pools and where you can't get without flying. She would like to see distance mentoring in these areas, and then MS brought up what IOIA is doing with LOL basic training. Sandeep also spoke very strongly for pairing up experienced inspectors with local junior inspectors, and they see that this is an area where the APC can be a leader. It takes away a lot of the cost factor since no one has to travel. MS – will follow up by email with Sandeep about the distance mentoring. Sandeep has already been doing some distance mentoring between inspectors in Thailand and India. RS – it's important to have in our minds as inspectors developing remote audit programs and as IOIA developing remote training program, it's important that we focus on due diligence because people are going to feel that we're not doing enough. Part of due diligence is focusing on other aspects with greater depth than you would normally focus on if onsite. CM – One of the biggest barriers to people getting certified is cost. We should look at cost savings as a benefit to the producer. If we can't get cost savings doing virtual inspections, we're increasing risk without benefit.

Three main points from the meeting:

1. They should focus on developing good remote auditing process.
2. They would like to do an online workshop for virtual inspections and basic training.
3. They may continue idea of educating growers in PGS systems – while it may not lead to certification, it does increase local consumption and encourages a more resilient food supply.

**Latin America Report:** PD - In Costa Rica, they are not doing onsite or remote inspections. Every certifier and every inspector is facing the crisis on their own and there is no organization. Almost all inspectors are part time or staff inspectors, so they are able to work other jobs. It seems in Mexico they are still doing onsite inspections. PD - Luis Brenes tried to set a meeting with CIAO (the Latin American committee on organic agriculture/the competent authorities) with IOIA and certifiers. Graciela from CIAO sent an email to Lois, and Lisa will be helping Lois to set up a town hall meeting in Spanish language. This will hopefully generate some interest in IOIA in Latin America. JG – Does everyone in the region have access to the tech needed to participate in the Town Hall? LC – Yes, it's about the same as in the U.S. Inspectors should have internet and access to tech needed.

**ACA Contingency Plan WG & Draft Best Practices, IOIA Town Halls, Trainings** (abbreviated for this issue due to focus of these topics in last issue)

**ED Report:** Letter from Rob Dixon – MS would like the BOD to respond to him.

### June 22, 2020 - 4:00 to 7:00 PM Eastern Daylight Time

**Present:** Lois, Rachel, Chuck, Heather, Philippe, Ryan, Janine (recorder). Others: Margaret Scoles, ED

#### Agenda Item #, Minutes, and Action Points:

**#2 Approve agenda:** Review & send comments to LC, copy BOD

Janine moves agenda be adopted as presented. Carried.

**#3 Secretary's Report:** ACTION - Margaret to finish reviewing the April 20 minutes and will consult with Heather. And circulate for approval via GoogleDrive.

See BOD, pg 24

## BOD Minutes, from page 22

**#4 Strategy Planning:** Review & send comments to Heather, copy BOD/ED.

Concerns expressed about how much the idea of the inspectors co-op had evolved in the Plan, though the original volunteer committee for that initiative has not actually met. General discussion on concern about the budget estimates. Budget estimates in Strategic Planning are a simple discussion guidance tool. Covid distracted us. Committee meetings need to take place as we know the industry and what we need as an inspectors' association. Rachel asks for a Strat Plan Folder we can refer to on google docs. Strategic Plan folder was created. We all like the February Silos Document.

**ACTION:** each Chairperson to call a meeting with Lisa and their committee members for our next strategic step preferably before our next board meeting.

We note we are just exploring the feasibility of training to other standards like PGS.

**#5 2021 AGM:** Date/Time/Length, Proposed speakers, Voting Procedure, AGM Committee.

Discussion on scheduling IOIA AGM later Thursday like our Town Hall Meetings but accessible to Asia Pacific Committee. Sometime in Feb... such as Thursday February 11th - looking good, researching conflicts. Discussion of planning Town Hall discussion topics to lead up to an engaging discussion based AGM, with exciting guest speaker presentations. Starting at 3 pm Pacific time encourages Asia Pacific participation at possible risk of losing East Coast members. 2.5 hrs, maximum length out of respect.

AGM Committee struck to develop ideas. Alliance for Organic Integrity needs to be on agenda.

**ACTION:** Committee volunteers Janine & Ryan to ask Terrance, Margaret to ask membership. AGM Committee to report back to us.

**#6 Latin American Report:** CIAO Training on June 15 a great success! Much thanks to Philippe, Lois, Garth and Lisa and all involved! Remote inspections challenging for small operations and grower groups, easier for corporate agriculture which can manage the technology. Training may need to be adapted to that reality to be useful. Many inspections will likely be document-review only, followed by physical inspections later.

**#7 Accreditation/Membership Issues:** Applications for IOIA inspector membership or accreditation from applicants without IOIA basic training remains a thorny issue. What is equivalent training?

**ACTION Point:** Margaret to reach out to Membership and Accreditation committees to meet to discuss a joint recommendation.

**#8 Training Re-take Discussion:** Easier to proctor exam re-takes online now, Test shared in Google docs. Would be a big policy change to allow re-takes. Need to be responsive to the impacts of our Live Online trainings. General consensus that the current policy can be adapted to allow exam re-takes depending on trainer recommendation and the circumstances.

**#9 Town Hall:** Rachel reports Town Hall continues to involve our membership. Guest speakers have been well appreciated. Topics can be carried forward to address members' concerns. Chuck asks how the Forum and the Town Hall intersect? Two different ways to do the same thing- engagement, but facilitated discussion on Town Hall is more engaging.

**#10 Organizational Memberships (COTA, OFA, etc.):** Discussion on expense of COTA membership, to be considered during budget planning. Ryan presents our membership fees are already in the budget. OFA is similar to COG asking for IOIA membership at \$250.

**#11 ED Report - other issues:** Blu Solutions timing has been challenging for making progress. Margaret asks for an update on the website Covid statement. Share tips on how to be careful! Medical guidance when necessary, Links to epidemiologist. **ACTION:** Margaret to work on a revision to the board for comment.

**#12 Next meeting - 2 or 3 hrs.?** 3 hours previously set. Thanks Heather!

**#13 Adjourn.** Next Meeting: August 18, 2020 Submitted by Heather Donald, Secretary 

**Low-tech No-tech Remote Inspections**

INTERVIEW with Rachel Cherry Myers,

IOIA board member and the brain behind IOIA's remote inspection training website from page 21

his eyes would get big and then 'can you see these documents? Can you see my screen?' His family would come in and they'd just stand in the back and they'd look at him, at the screen, and then I would wave and then they'd look at each other and they would wave and then they'd go back and they'd bring more people in to wave at me sitting in Buffalo with XXX sitting there. He had his stuff together; he was very serious about getting it done. It was a new operation so we could do it as a hybrid and it was in the height of craziness in New York so he wanted to get certified and he did what it took. We did some of it onsite with the touring stuff and then when it got into the closer quarters, he helped out with some Facetime video. It was a lot of fun. I had a really good time with it. That's my favorite by a longshot.

**MS: Do you find time management easier or harder?**

RCM: Much harder. The number of contacts is difficult. When I'm in the field I have lots of 14-hour days. And you do a trip and you leave on a Sunday and you wake up early and you drive to a farm and you walk the farm and you walk the barn and you do the paperwork. Then you stop doing paperwork and you talk to the farmer and then you get up and you look at something else and then you leave and you have lunch and you drive around ... Now, I go entire days without leaving my house. You can't do a week of 14-hour days like that. I can't do all day Zoom meetings, it's exhausting. So, the scheduling and getting used to what is efficient being on the road versus what's efficient being behind a desk and splitting things up as much has been really difficult. I'm also hearing it from most inspectors that I talk to. Sometimes the inspections are longer but sometimes they're significantly shorter. Because people are prepared. For a while I was going at 50%. And maybe now I'm going at 60 or 70%. I'm not sure how I'm going to get everybody done.



**This season, Margaret completed 3 hybrid inspections, 2 on-site inspections, and will soon be completing her first 100% remote inspection.**

**MS: Did you change anything about your technology other than your zoom acct or your GoToMeeting account? Was there anything that you added because you were going to do remote inspections?**

RCM: A second monitor was really helpful. My boyfriend is in IT. He said a second monitor, no matter what you're doing, you're 30% more productive. The other thing I've really loved has been a stand for my iPad. I use that right now as a third screen. I use it in so many different ways besides this.. I was pretty tech heavy before the pandemic.

**MS: I did 3 hybrids where I did the visits all in one day. A lot of driving - 357 miles that day. I was driving all the time because we weren't allowed to be in the vehicle with the producer. The first producer said 'I'll have a pair of handheld radios. I thought 'perfect' and 'I'm cheating a little bit because he's handing me a radio, right?' I had my mask and sanitizing wipes. I wiped it down and I wiped it down when I gave it back. That was amazing, hundreds of miles, him in his truck, me in my truck. We had a better conversation in that onsite inspection than we ever do. I couldn't take as many notes. That was the only bad thing, but the conversation was so much better. And the next inspection we did the same with a set of walkie talkies. I will never go anywhere now without walkie talkies or handheld radios. They are a great idea for people who are going onsite. They help you stay socially distanced. Of course, if you are in a processing facility you can stay apart and walk around and talk on your phones. In Montana one of the problems I encounter is, they're not low-tech producers but there's no cell phone service. So, talking on your phone doesn't work because half the places you're at in the 10,000 acres there's no cell reception. Handheld radios and walkie talkies are tools I hadn't thought of. I can't believe I lived this long in life without realizing how essential they are. All this time that my husband was in the hayfield and I couldn't call him. What was I thinking? And so, is there anything that you can think of, surprises or tips or anything for other people who haven't had as much experience as you have?**

RCM: I think it's, try not to get so frustrated, it tends to get better. I'm a couple of months into it and I still don't feel 100% confident and what's realistic expectations for myself and am I going to be able to finish all my assignments, and keep my certifiers happy. I know what I can do onsite and feel competent in my capabilities, for years. I know what I can do, I know what I can commit to what I can get done well. And this is just a different ballgame. I feel like I'm a first-year inspector again, how am I going to do an inspection?

**MS: It's scoping a project without having experience.**

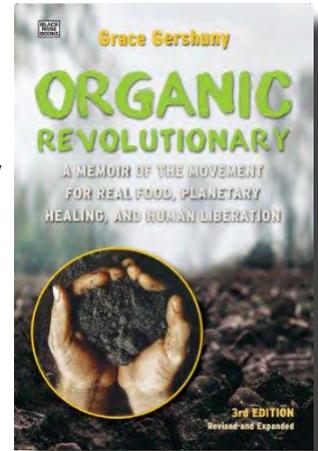
RCM: Yeah, so important to not be so hard on yourself. You know, the energy surrounding it and just kind of managing your expectations. I haven't talked to anybody who's been like, 'whoa this is 10 times easier and I never ever want to go back to any kind of onsite ever again, this is way better in every way.' Nobody says that. There are good things about it. I've been able to have a garden, my food isn't rotting in the refrigerator, and there's been some really positive things. That's going to be the takeaway I think, just trying to have a healthy attitude where you're not overly unrealistic about what you do like and what you don't like but that you're aware that it'll get better as you learn. ☺

## Resources

### Organic Revolutionary - Third Edition

The third edition of [Organic Revolutionary](#) was published in early March by Black Rose Books of Montreal, with US distribution by the University of Chicago Press. A book launch event in Montreal was held just days before the US-Canada border was closed and many lives were upended by the Coronavirus pandemic. Despite the delay in formal announcement, the story remains relevant to the “Great Work” that is now more urgent than ever.

“Never let a good crisis go to waste” has become a catch-phrase of this constellation of movements. In rural areas like mine neighbors helping neighbors has become an automatic response, home gardening projects are skyrocketing, and idled workers put their ingenuity online to offer support to front line health care workers. The US is waking up to the failures of its mass centralized food system as meat packing facilities shut down and crops go unharvested. The dangers to all of growing poverty and homelessness, not to mention lack of access to health care, come into sharp focus.



### Organic Now at the Heart of Europe’s Future Food System

The European Commission has officially proposed a target to increase organic farming in the EU to 25%, by 2030.

<https://www.organicseurope.bio/news/press-release-ifoam-eu-welcomes-landmark-decision-to-put-organic-at-the-heart-of-future-european-food-system/?redirect=1>

### COVID-19 and the Crisis in Food Systems: from Symptoms to Solutions

The International Panel of Experts (IPE) has released a communique on Sustainable Food Systems looking at the vulnerability of food systems in times of COVID-19. [Read it here.](#) Via *The Insider* April 2020, IFOAM – Organics Int’l

### How Big Dairy is Heating up the Planet - Report

The Institute for Agriculture & Trade Policy’s (IATP) latest report, [Milking the Planet: How Big Dairy is heating up the planet and hollowing rural communities](#), reveals that the total combined greenhouse gas (GHG) emissions of the world’s largest 13 dairy corporations rose by 11% in just two years (2015-2017).

As the global dairy industry expands and scales up into new territories, dairying is disintegrating into larger operations controlled by a handful of big dairy processors. Simultaneously, Big Dairy’s GHG emissions are increasing, and indebtedness, farm loss and bankruptcies in rural communities are on the rise. The COVID-19 crisis has compounded the dairy crisis, further revealing the fragility of the concentrated system built by corporations.

### Africa’s Green Revolution has Failed, Time to Change Course

Fourteen years ago, the Bill and Melinda Gates and Rockefeller foundations launched the Alliance for a Green Revolution in Africa (AGRA) with the goal of bringing Africa its own Green Revolution in agricultural productivity. According to a new report [False Promises: The Alliance for a Green Revolution in Africa \(AGRA\)](#), from a civil society alliance, based partly on IATP’s Senior Advisor Timothy A. Wise’s new background paper, AGRA is “failing on its own terms.”

Following the launch of the report, we released a new policy brief authored by Tim Wise of IATP, [Africa’s Choice: Africa’s Green Revolution has Failed, Time to Change Course](#). Based on Tim’s background research for the report, the document highlights some of the report’s findings and their implications for African development. Read the full policy brief, available in [English and French](#), and read the full report, [False Promises](#), published by Rosa Luxemburg-Stiftung and a coalition of European and African nongovernmental organizations.

You can read Wise’s report here: [Failing Africa’s farmers: New report shows Africa’s Green Revolution is “failing on its own terms.](#) IATP news 7/31/2020

### Consumer Reports Develops Rating System For Pesticides in Produce

Consumer Reports (a member of the National Organic Coalition) released [this study](#) in late August on pesticides in produce. CR analyzed five years of data from USDA’s Pesticide Data Program and used the results to develop ratings for 35 fruits and vegetables to help identify which produce items pose the biggest risk from pesticides. The products evaluated include organic, nonorganic, grown in the U.S., and imported. NOC press release, 8/27/2020

## Thoughts about hemp – from the IOIA Forum

*We thought inspectors would find the following thread of interest.*

**“Certifier X is interested in having an inspector send a hemp sample from one state where it will be taken from the processor to another where it will be tested in a lab. As per the USPS, if we have all of our ducks in a row (licenses, traceability, chain of custody, copy of THC test, etc.) we should be legal. However, if the sample happens to in fact be hot for THC despite the documentation, in your [forum members] impression, could the inspector be accountable for shipping illegal marijuana through the USPS?”**

*I think your question is for a lawyer, but speaking for myself and our inspectors, we wouldn't do it. Not worth the risk right now, the laws and regulations and the enforcement of them are too uneven across the country.*

*You may have gotten assurances from someone at USPS, and you may have been told by a lawyer that it's technically legal, but that won't stop some individual postal inspector or law enforcement officer with a drug-sniffing dog or airport screener or truck weigh station officer from enforcing their own idea of the rules. There's still a lot of misinformation and negative attitudes about hemp out there amongst those in positions of authority.*

*As an example, google the cases of the truckers legally hauling hemp between Colorado and Oregon who have been arrested, jailed and convicted of transport of marijuana just because they were passing through Idaho. States are supposed to allow legal transport between other states. That didn't stop Idaho.*

*Can you guarantee that something like that won't happen to your inspector when they are identified as the shipper of the flagged package?*

**Thanks for considering the inspector liability in this scenario. Because the outcome is unknown, it's simply not worth the risk.**

*As an inspector I would identify the AC that requested the sample to be shipped as the shipper of the sample. The chain of custody would identify the individual inspector as having pulled the sample and prepped the package, but on the shipping documents I would identify the certifier as the shipper (who is also paying to have the sample shipped). If the certifier wanted to take that risk on that is a certifier decision. Certifiers are not always able to pass the liability off onto another entity and there are simple measures that inspectors can take to limit their exposure to risk & liability.*

**I don't think “But my boss/client told me to do it” really works to shield anyone from criminal liability, in court or in pleading your case to a law enforcement officer. It certainly didn't work for those truckers.**

*That is an interesting conundrum. With the federal government pulling back and letting states take the lead in most regulatory/law enforcement activities, I would guess there are different rules and levels of enforcement across the board. If any of those entities pursued criminal charges, they would go after all parties. For an inspector the legal fees would be crippling, even if you got cleared of charges. Simply not worth the risk. However, this does open a loophole in organic enforcement. From what I have seen, many hemp buyers are doing extensive residue testing and would likely punish someone financially for having prohibited substances on the hemp they were growing. But hemp production is the wild west and anything goes!*



## Resources

### NOP Organic Oversight and Enforcement Report

The National Organic Program (NOP) has released an update about their enforcement work: [Organic Oversight and Enforcement Report](#). The report includes a summary of investigations and compliance actions, an update on the work of the Organic Agricultural Product Imports Interagency Working Group, and an overview of organic import oversight.



International Organic  
Inspectors Association

IOIA  
PO Box 6  
BROADUS, MT 59317 USA  
WWW.IOIA.NET  
IOIA@IOIA.NET  
406 - 436-2031

*KEEP IOIA STRONG – LEND YOUR STRENGTH AND GET INVOLVED!*

## *2020 - 2021 Calendar*

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

Celebrate all things organic during **Organic September!** – Go to the [Organic September website](#) for the details.

### **Next Monthly IOIA Town Hall Meeting - Thursday, September 24, 1:30 pm Pacific**

**October 5 - 9** IOIA Basic Crop and Processing Training, Saco, Maine. Postponed until May 17 - 21, 2021.

**October 20, 22, and 28-30** The [National Organic Standards Board Fall 2020 meeting](#) will be held live online from noon to 5 p.m. Eastern time. The meetings are free and open to the public.

Registration is not required unless you wish to provide public comment.

In addition, a panel discussion on sanitizers is slated for November 12, 2020, 3-5:30 p.m. (Eastern).

**November 2-13** IOIA Basic Crop and Livestock Training Farmington, Minnesota. Postponed until October 18 - 29, 2021.

**November 5 - 6** Organic Connections Conference is Going Virtual!  
more info here: [www.organicconnections.ca](http://www.organicconnections.ca)

**January 20-23, 2021** - EcoFarm Conference 2021 - Virtual! *Reimagining Our Future*  
See their site for info, full slate of events - [Virtually!](#)

**Guelph Organic Conference** <https://guelphorganicconf.ca>

GOC will not be holding an in-person physical conference in January 2021 at the University of Guelph. More info page 9.

**January 25-28 & February 1-4, 2021** ACA and NOP Annual Trainings (Virtual)

**February 2021**, dates TBA - [MOSES Organic Farming Conference](#)

**March 4, 2021** - IOIA Virtual AGM - See article page 8.

**September 8 - 10, 2021** 20th Annual IFOAM Organic World Congress, Rennes, France.

*PLEASE SEE PAGES 2 & 3 FOR THE CURRENT LIST OF  
IOIA LIVE ONLINE, ONSITE, WEBINAR AND SELF-DIRECTED TRAINING OPPORTUNITIES*