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Upcoming ACA Meetings

ACA members attending the meeting of the National Organic Standards Board, May 4 – 7, in Washington, D.C., and All Things Organic, June 16 -18, in Chicago, IL are invited to join other ACA members to discuss pertinent issues of the day.

Our meeting in Washington, D.C. will be held on Monday evening, May 4, at 5:30 – 7:30 pm, in the State Suite of the Washington Plaza Hotel. Light refreshments will be provided. Topics on our agenda will include discussion of NOSB agenda items and comments; discussion of topics for our next annual

training program and an update on the Working Groups activities.

OTA has also provided a meeting room for us during the All Things Organic Show. We will meet on Tuesday, June 16, at 8:30 am to 10:30 am. Please review the All Things Organic schedule upon arrival to locate the room. Again, our discussion will focus on current issues, discussion of the NOP meeting; update on Working Group activities.

We hope you take these opportunities to join us and participate in our activities.

ACA Working Groups

Currently 5 Working Groups are active, with another due to be started in the next weeks. Groups have an average of 8 participants, conduct conference calls every 2 weeks, and are beginning to meet their initial goals.

As the groups complete their work, this is reviewed by the ACA Board. Depending upon the goals of the group, comments and support from all ACA members will be solicited.

The **Apiculture Working Group** identified several goals including:

- Developing a recommendation to

the NOSB and the NOP for future inclusion in the Final Rule;

- Developing a detailed guidance document for ACA members and other accredited certifiers to use until the NOP has a practice standard in the Rule;
- Identify materials that may need to be added to the National List;
- ACA could recommend that in lieu of a Final Rule practice standard, these apiculture standards be published as official NOP guidance.

Discussions to date have focused on determining an appropriate forage

ACA Working Groups, cont.

zone, the transition time for colonies, equipment requirements, and heating of honey. The group is also reviewing European and Canadian standards to ensure that our proposals are in line with those standards. This group is continuing its work. Members include Harriet Behar and representatives of BCS, HOFA, MOFGA, MOSA, OneCert, OTCO, PCO and VOF.

The goal of the **Biodiversity Working Group** was to develop comments on the NOSB Joint Crops & Compliance, Accreditation & Certification Committee recommendations regarding the *Implementation of Biodiversity Conservation in Organic Agriculture Systems*. The group acknowledged that the concept of biodiversity is sometimes a “hard sell” to busy producers, and there is a reluctance to impose extensive additional paperwork requirements to meet this portion of the rule. Several examples of the OSP’s and inspection report forms currently being used were circulated for review. It was suggested that the term “biodiversity” be de-emphasized in the NOSB recommendation in favor of “natural resources” for two reasons, (1) natural resources is defined in the Rule, and (2) farmers are familiar with the term natural resources and it is generally looked upon in a favorable light. It was also noted that biodiversity is only one of the tools that can be utilized to assess the management of natural resources; therefore these issues could be combined both in the OSP and the inspection report without an increased amount of paperwork. The group generally supported the NOSB recommendation, with the inclusion of the reference to natural resources rather than biodiversity. The ACA Board supported this; the recommendation was submitted to the NOSB and distributed to the ACA membership. Members of this group included representatives of CCOF, MOSA, NMOCC and Organic Agsystems Consulting.

The **Inputs Working Group** was initiated to address concerns of the ACA membership regarding the NOP Notice: *Input Approval under the NOP Regulations: Liquid Nitrogen Fertilizers*. The ACA Board asked for a draft of a letter to the NOP regarding the concerns identified. The group identified short term issues that needed to be addressed, as well as long term issues.

The question arose of just who “3rd party reviewers” are. The group agreed that third party reviewers may be either:

- a) Governmental regulatory agencies such as EPA or state fertilizer control officials;
- b) Inspection bodies that are not organic certification agencies, such as OMRI, who provides contractual services for material review to certification agencies; and
- c) Organic certification agencies that provide contractual services for material review to other certification agencies, such as WSDA.

The group does not believe that accredited certifying agents who conduct product review based upon requests from our clients are 3rd party reviewers. This information was communicated to the NOP.

The group believes the requirement that manufacturers of both conventional and organic inputs must have a 100 yard buffer area between the materials is very problematic and will lead to manufacturers discontinuing organic input production. The group suggested that the issue of possible contamination and comingling of conventional inputs and organic inputs be addressed through:

- a) A plan provided by the manufacturer, similar to an organic system plan of a producer/handler, a portion of which would address organic integrity as described in §205.272 of the NOP;
- b) Specific requirements to conduct audits at the time of inspection comparing amounts of

ACA Working Groups, cont.

materials/ingredients – both conventional & organic – received, used, stored, & shipped.

- c) Sampling and testing of the basic ingredients and the finished products to assess nitrogen content of ingredients and formulation percentages;
- d) Secondary unannounced inspections for parallel production manufacturers

Additionally, the Inputs Group believes that it would be beneficial for all ACA members if we compiled a list of products requiring additional review, so that all are aware of these materials. The materials of concern are products that individual certification programs have approved for use, that are not currently listed with OMRI or WSDA and are over 3% nitrogen label claim. This list will be distributed to ACA certification agency members only, and will not be for public distribution. In addition the Group would like to receive feedback from ACA members regarding the process being used by organizations for the implementation of this new policy.

The full draft of the letter to the NOP was sent to the membership, along with a short survey regarding the process being used to address the NOP notice. This group will resume work around June 1 after the survey information is received. Members of the Inputs Working Group include representatives of CCOF, MOSA, NICS, NOFA-NY, OCI, OEFFA, OMRI, OneCert, PCO, and WSDA.

The **Poultry Outside Access Working Group** began its work with a comparison of many standards regarding the various space requirements for poultry. The goal of this group is to develop a detailed guidance document for accredited certifying agents for the management of organic poultry, and once that is complete, develop regulatory language based upon the guidance document, which would then be provided to the NOSB and the NOP.

The group reviewed the EU standards, the Soil Association, Canadian standards, Humane Farm Animal Care, Animal Welfare Approved guidelines, PCO Guidance, and the United Egg Producers Guidelines. A reference chart was developed comparing indoor square foot requirements per various types of birds (pullets, layers, broilers, turkeys); outdoor run square foot requirements; perch space requirements, nest box requirements; birds/acre for pasture operations. In addition, management technique allowances/prohibitions were identified including beak trimming, toe nail clipping, wing clipping, molting, and lighting requirements.

The group is currently refining a draft *Organic Poultry Production Guidance Document*. Once this is completed, it will be distributed to ACA members for comments. Members of the Poultry Outside Access Working Group include representatives of BOC, CCOF, MOFGA, MOSA, OTCO, PCO, QCS, and WSDA.

The goal of the **Private Label Working Group** is to develop a policy for use by accredited certifying agents that provides consistency in certifying the private label scenario, including developing forms for use in the process. Discussion identified areas where there was agreement and also identified problematic areas, such as being able to trace products. Participants in the group circulated the various forms used in their agencies in order to identify the process each was using. The group is currently developing a document for use between certifiers that will address which certifier is responsible for specific information. Work is also beginning on drafting a guidance document for private label certification. Members of the Private Label Group include representatives of CCOF, ICS, MOSA, NOFA-NY, OneCert, Organic Valley, OTCO, PCO, QAI, QCS, and WSDA.

ACA Working Groups, cont.

A **Seed Issues Working Group** will be forming shortly to address commercial availability and GMO seed issues. In addition, there is consideration of forming a Health & Safety Issues Group to address the NOP Notice regarding the organic inspectors' responsibility to address health and safety issues during the organic inspection.

Thank you to all who have participated in the Working Groups to date. We will be able to share very good information from the working groups with the membership shortly.

ACA Annual Meeting 2009

ACA held its annual meeting during the time of our ACA / NASOP Professional Development Training at the Asilomar Conference Center in Pacific Grove, CA. There were 23 attendees at the meeting.

The election of ACA Board members was concluded at this meeting. Members who did not plan to attend the meeting were provided with ballots prior to the meeting. Those members attending voted at the meeting. Don Franczyk, Kristy Korb and Bonnie Wideman were re-elected to serve a two year term.

The ACA Board of Directors re-elected our current officers to serve an additional one year term. The officers are: Leslie Zuck, Chair; Brett Bakker, Vice-Chair; Donald Franczyk, Secretary/ Treasurer.

The ACA activities of 2008 were reviewed and discussion of potential 2009 activities included an expansion of the Working Groups to include:

- An International Issues Group to address the multiple standards agencies are working with.

ACA Annual Meeting 2009 (cont.)

- An NOP Communications group which will solicit issues for discussion from members, prepare background info, and forward to the ACA Board for communication with the NOP.

NOP accreditation issues were also discussed. Several concerns were identified:

- Convincing NOP to recognize our forum as a training tool.
- Forward movement on establishing the Peer Review Panel; ACA should work with other groups (NOC, OTA) to move this process forward.
- Full integration of ISO into the NOP, including 17011
- Improved certifier training, including communicating with other regulatory agencies – NIST (National Institute of Standards & Technology) – higher up in USDA. USDA currently provides the Audit, Review & Compliance auditors with training – certifiers should be able to attend these trainings also.

Additionally, the group discussed implementing a more formal plan to identify long term goals for ACA, including judging the effectiveness of our goals.

ACA / NASOP Training

Attendance at the ACA / NASOP Professional Development Training in Pacific Grove, CA was very good, with 44 attendees, despite several state programs having their travel budgets reduced. Our first two-day training overflowed with information – the presenters were excellent – and the comments from those attending were very positive. We extend our thanks to all the presenters who shared their knowledge with us. Planning for 2010 has begun. Suggestions for topics or presenters should be sent to Pat Kane.

~ Thank You ~
to the following
New and Renewing Members

Agricoat, LLC
CCOF Certification Services
ECOCERT
FoodChain Global Advisors, Inc.
International Certification Services
Kentucky Department of Agriculture
Kerr Center
Maryland Department of Agriculture
Monterey County Certified Organic
Organic Materials Review Institute
Quality Assurance International
Scientific Certification Services
Washington State Department of Agriculture
Wolf, DiMatteo & Associates



ACA Board Notes

January 2009

- NOSB Member Joe Smillie participated in the call, updating the Board on the work of the Compliance, Accreditation and Certification Committee: 100% Label, Retailer Issues, Biodiversity (will be mainly guidance), recommendation to NOP to develop personal care standards, recommendation that the Peer Review Panel be implemented.

ACA Board Notes (cont.)

January 2009 (cont.)

- The Board reviewed the end of the year financial reports.
- Barbara Robinson has been asked to participate on our February conference call.
- Last minute details of the Training Program were discussed.
- There was discussion regarding the ability of ACA to offer reduced subscriptions to *The Organic Standard*. Additional clarification is needed from the publisher.

February 2009

Barbara Robinson of the NOP participated in this ACA Board conference call. Barbara discussed the progress on the development of the on-line training plan – a template on labeling has been developed. Shannon Nally will be shepherding the rest of the project. Discussion also took place regarding the salmonella contaminated peanuts and the responsibilities of organic inspectors to report violations of basic health and safety standards if they observe them. Board members generally stated that inspectors look to see if licenses/ registrations are valid and that inspections are current. All other agenda items were tabled until our March call.

March 2009

The Board had two conference calls in March, one to address the NOP Liquid Fertilizer Notice; the other our regular call. The outcome of the first call was that the ACA would encourage members to begin implementing the requirements of the notice, but a Working Group would be initiated to address concerns in the notice, to be given to the Board. Miles McEvoy and Dave DeCou joined the Board on the 2nd call to discuss the Fertilizer Notice and to obtain an update on actions OMRI and WSDA were taking.

ACA Board Notes (cont.)

March 2009 (cont.)

The Board discussed the benefits of OMRI's participation in the discussion group. They did approve adding OMRI to the ACA discussion group on the basis that OMRI is an ISO Guide 65 audited accredited body operating in contract with certifiers.

April 2009

- The Board reviewed the 1st quarter financial reports. The training income and expenses were finalized and there was a small profit.
- An extensive update of the activities of all the Working Groups was presented. There was discussion of the draft letter to NOP developed by the Inputs Working Group. This was approved by the Board. The Board is hoping for a response prior to our next Board call in May.
- The Board re-elected our current officers for a one year term.
- There was a discussion regarding the upcoming NOP meeting in Chicago. It is not known as yet if Pat can attend.
- ACA will have a meeting during the NOSB meeting on May 4; we will also have a meeting at All Things Organic on June 16.
- There was preliminary discussion regarding our 2010 training program.

The Organic Standard

The Organic Standard is an international monthly journal that enables individuals and organizations to monitor the worldwide developments concerning organic standards and certification issues. The publication offers group subscription rates to qualifying organizations. The rates for subscription to this e-mail journal are significantly reduced with group participation.

Currently the subscription rate for an individual is 265 Euro, or approximately \$345.10, based on the current exchange rate. A definitive group subscription rate for ACA members cannot be determined until the final number of subscribers is known. The likely range of subscription costs is \$175.00 - \$200.00, depending upon the number of subscriptions we have.

In our conversations with *The Organic Standard* staff, they have indicated that it would be very beneficial to have members of ACA as subscribers.

The Organic Standard is provided via email on a monthly basis, as a pdf document. For those not familiar with *The Organic Standard*, you can download several archived copies at website: www.organicstandard.com then click on Read It!

Is your organization interested in joining a group subscription to *The Organic Standard*? Contact Pat Kane if you are interested in subscribing. [patriciakane@accreditedcertifiers.org]

