

Volume #2, Issue #3

December 2006

ACA News

The ACA Board has continued to conduct its monthly conference calls – with good participation by all. Joe Smillie, NOSB Certifier Representative was has been able to join us for several calls. An ACA Update was sent to members regarding his discussion with the Board. Much of the work of the Board has been around discussion of our educational activities (see Committee Report).

Several new certifying agencies, plus new Supporting Members have joined ACA in the past couple of months. Additional efforts are underway to contact other non-member certifiers and encourage them to join.

ACA has received its non-profit taxexempt 501(c)(3) status from the IRS!

Education Committee Activities

The Education Committee has established an ACA meeting schedule for the coming year. ACA will meet at both the fall and spring NOSB meetings, as well as conduct a 1 - 2 day certifier training program in the winter of 2007. Our Annual Meeting will also be held at the spring NOSB meeting.

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The focus of the meetings prior to NOSB meetings will be the legislative topics under discussion by the NOSB, with the goal of providing comments to the NOSB. These meetings will likely be 3 - 4 hours long.

The ACA training programs will range from 1 - 2 days, with in-depth discussion of specific topics. It was felt that we should draw from the following categories as topics for training:

- Current legislative & regulatory Issues Would include standards discussion as well as current topics
- Materials Discussion on specific materials, as well as general training
- Crops
- Livestock
- Processing
 - Certification / Accreditation Includes inspection, residue testing, complaints, etc.

Save the Date February 21, 2007

ACA Training for Certification Agencies

at the

Upper Midwest Organic Farming Conference La Crosse, WI

Details will be sent soon

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ACA Members Attend IFOAM Conference on Organic Certification – Leslie Zuck

Accredited Certifiers Association members Leslie Zuck of PCO, Marty Mesh of QCS Thierry Pomerleau of OTCO. and participated in the 1st IFOAM Conference on Organic Certification in Rome, Italy, November 15-17, 2006. Leslie Zuck, ACA Board Chair and Executive Director of Pennsylvania Certified Organic; Marty Mesh is Executive Director of Quality Certification Services Thierry and Pomerleau is International Projects Manager for Oregon Tilth Certified Organic. Miles McEvoy of Washington State Department of Agriculture and National Association of State Organic Programs (NASOP) also participated. The conference was attended by about 150 representatives from 35 countries. Most heavily represented were the European Union countries, but there were also many attendees from India, Eastern Europe, South America and East Asia.

The program included a day-long tour of the Agricoltura Nuova, a workers cooperative producing vegetables for an 800-member CSA, beef, pork, eggs, honey from 400 hives, yogurt and cheese from 1000 sheep. The 30-year-old, certified organic farm comprises 250 hectares within the city of Rome and provides a picnic area, conference and catering facilities for community use.



Hoop house used for egg production.

The farm was still in full production with fields and hoop houses brimming with lettuce, kale, broccoli, cabbage, radicchio, tomatoes & herbs. CSA ("box scheme") crates also contained fennel bulb, apples, pears, oranges, carrots, onions, winter squash and persimmons.



The sheep are mostly on pasture, yearround, and the farm produces hay and grain for the livestock as well as spelt which they mill into flour. Electricity is provided by solar and wind power. Cardoon flowers grown on the farm are used as rennet for the cheese.



The conference itself held 2 days worth of presentations focusing on "Organic Certification Today and in the Future," followed by a half-day meeting of IFOAM's Certification Body Forum. Presenters discussed many different approaches to certification ranging from fully electronic systems for application, inspection and certification to various types of participatory guaranty systems where growers are involved in the standards and verification process. The differences between public and private certification (government) systems were explored as well as opportunities for public-private partnerships. It became obvious throughout the presentations and discussions that certification needs vary greatly among regions of the world depending on market requirements. This is a major reason why so many certification systems have arisen to meet these diverse market needs.

Our US system is both envied and pitied, depending on the topic of conversation. Most envious, especially by EU members, is the transparency of the National Organic Program. Open meetings, public comment, advisory boards and publication of proposed rules do not exist in the EU system. On the other hand, the lack of producer influence in ever-evolving organic standards is lamented, but seems to be at least better than in other where systems there is no private certification at all.

Another popular topic was how to use accreditation systems to better serve producers by offering a way to decrease the many difference compliance audits they must endure. One inspection for multiple market claims is a goal many would like to work towards. Of course harmonization, equivalency and recognition were common themes, but it was most often concluded that no matter how hard we work at this and how reasonable it is to do it, it still comes down to a matter of political will.

How can the ACA fit into improving the future world of organic certification? Although it has been this organization's goal to provide a forum for all USDA-accredited certifiers, including those outside of the US, many foreign certifying bodies already

belong to various certifier associations and alliances. During the IFOAM CB Forum, it was recognized that there is a great need for better communication among the world's certification agencies, regardless of whether they certify to the same standards. It was suggested that representatives from various certifier organizations meet at BioFach in March to develop a proposal on how this goal can be met. This would include ACA, NASOP. IFOAM, European Organic Certifiers Council. Instituto per la Certificazione Etica e Ambientale.

ACA Meets in Arlington, VA, in conjunction with National Organic Standards Board Meeting

The ACA hosted an informal discussion meeting of certifiers (both members & nonmembers) in Arlington, VA on October 16, prior to the NOSB meeting. Our purpose was to receive input regarding the proposed recommendations of the National Organic Standards Board relevant to certification. Representatives of 10 certification agencies were in attendance. In addition, other nonmembers were in attendance.

An ambitious agenda was presented for our limited time, and we did manage to discuss most items, some however, were very brief discussions. Our discussion focused on

- Standardized Certificates
- Expiration Dates on Certificates of Organic Operation

The outcome of our discussions, along with input from our previously circulated request for comments from our members resulted in the comments submitted to the NOSB on Tuesday, Nov. 17. These comments were sent to you previously, along with the report on the outcome of the NOSB Board votes on various recommendations.

Welcome New & Rejoining Members

Thank you to the following new and renewing members who are supporting the work of ACA:

- Agricultural Services Certified Organic
- AIB International
- BCS Oeko Garantie GmbH-USA Office
- California Organic Farmers Association
- Clemson University
- Georgia Crop Improvement Assoc.
- Global Culture
- Marin County Dept. of Agriculture
- Minnesota Crop Improvement Assoc.
- Natures International Certification Services
- New Hampshire Dept. of Agriculture
- New Mexico Organic Commodity Comm.
- Northeast Organic Dairy Producers Assoc.
- Ohio Ecological Food & Farm Assoc.
- OneCert, Inc.
- Organic Agsystems Consulting
- Organic Certifiers Inc.
- Organic Independents
- Organic Trade Association
- Organic Valley
- Quality Certification Services
- Quality Management Institute (QMI)
- Rhode Island Dept. of Environment

In the Planning Stages

The ACA Board has discussed and approved the concept of a project to develop consistent implementation of the National Organic Program. This new project will be similar in nature to the OTA's Organic Certifiers Council Standards Consensus Project (the results of the OCC SCP are posted on our website).

One critique of the OCC SCP was that there was no direct discussion of the outcome of the collated comments. In the ACA project, after all comments have been gathered and an interpretations developed, we will have a conference call to discuss the conclusion. Procedural guidelines will be developed soon and all members will be notified.

Comments Submitted to NOSB

The following are comments submitted a the NOSB Meeting, by Dave Engle, of Natures' International Certification Services. These comments are directed at the NOP, and were favorably received by the public attending the NOSB Meeting.

My name is Dave Engel, I am entering my 26th year as an organic dairy farmer and have been certified organic for almost 20 of those years. I have also been intimately involved with the certification side of the organic industry for the past 18 years and am presently the Executive Director of Nature's International Certification Services.

My comments this morning are addressed to the NOP in an effort to help us all reach a better level of communication, which will be helpful to us all.

In all human endeavors, success of those endeavors rests primarily with the success of communication that takes place amongst those involved in those endeavors.

The public / private partnership that is the NOP is no exception to this, and as we have experienced over the years of all of our efforts, some of our communications have been successful and some of them have not, with predictable results coming from each success or failure of communication.

Each of us has felt frustrated from time to time about different things that have happened as we've tried to make decisions to further our mutual cause of good healthy food produced without prohibited inputs. My overall point, here, is that it is critical that the NOP and the accredited certification agencies – the aca's – develop, establish and maintain a professional, two-way regulatory relationship/partnership which enables an aca to make their certification decisions in an informed, professional, procedural manner and which allows the NOP to provide the necessary regulatory oversight of this process.

The problem now, in my opinion, is that the current relationship between the NOP and aca's is a strained relationship due to the inevitable juxtaposition with the NOP of its perceived and actual dual roles of both serving as an accreditor and helping to make certification decisions for various individual certifiers.

It's noted and acknowledged that the NOP has made purposeful efforts to provide nationwide and international training for aca's to help aca's better understand and manage their role of making certification decisions. The problem occurs when an aca makes an informed and documented certification decision and then the NOP overrides or influences that decision.

As I say above there is within the NOP and current regulatory setup an inevitable juxtaposition of their overall responsibility of the two regulatory roles of certification and accreditation - Sections 400 & 500 respectively in the Rule - but it would be in all our mutual best interests to be able to have a well-developed clearly established process whereby the NOP concentrates its resources and attention on running a top notch accreditation program while at the same time – when the NOP is approached with a certification issue / question / problem / interpretation - that the NOP is then able to tap into and utilize the measurable experience and knowledge of the aca's via the ACA (Accredited Certifiers Association).

In summary, I would highly recommend and encourage the NOP to develop and establish such a process. Indeed, I remember a NOP training session which took place at the May, 2005, ATO meeting where the then-Accreditation Manager of the NOP, Mr. Mark Bradley, stated that he would prefer that the certifiers put their heads together in developing and establishing consistent, welldocumented decisions on various Rule

Mr. Bradley also invited the ACA members at that session to put together well thought out position papers on Rule interpretations and submit them to the NOP for dialogue, emphasizing the need for a well-documented suggested solution, and the NOP would respond.

Right now we are stuck in a situation that is widely variable as to how different aca's do interpret the Rule, with predictable resulting frustration amongst all aca's.

In summary, again, I highly recommend and encourage both the NOP and the ACA to be proactive in their efforts at more successful communications for all our mutual benefits, so that we are not left pounding our fists on the table.

Future Events

NOP Training, NASOP Meeting, Eco-Farm Conference

The National Organic Program announced they will conduct a certifier training **January 23, 2007**, during the Eco Farm Conference at the Asilomar Conference Center in Pacific Grove, CA. The National Association of State Organic Programs (NASOP) will also be conducting its annual meeting on January 23, 2007. The Eco-Farm Conference runs from January 24 - 27, 2007.

NOSB Meetings

The NOSB will be having two meetings: **February 6 – 7, 2007**. This meeting will be a working meeting to address 606 materials. There will be no public comment at this meeting. The meeting will be in Washington D.C.

March 27 – 29, 2007 will be a full NOSB meeting with public comment in Washington D.C.

IOIA Annual Meeting and Advanced Inspector Training

IOIA will sponsor Advanced Organic Inspector Training on **March 2-3, 2007** in conjunction with the 2007 Annual Meeting on March 4. The meeting and training will be held in Encinitas, CA.

Volunteers Needed

Additional Members Needed for the ACA Education Committee

• Host Agencies to assist with logistics for ACA Training Programs

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