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ACA Meeting In Portland

The Accredited Certifiers Association will host a meeting on **April 9, 2013**, from 5:30 pm to 7:30 pm at the **Hilton Executive Towers Hotel**, during the National Organic Standards Board Meeting Week. Discussion will include an update on the activities of the current ACA Working Groups, discussion of the upcoming ACA Training Program for 2014, and other topics. Join us – light refreshments will be available.

Record Attendance at ACA Training

A record number of attendees, including ACAs from Mexico, Argentina and France, as well as the US, and NOP staff participated in the NOP Training for Certifiers and the ACA Training in 2013, held in Orlando, FL. The weather also cooperated for our event allowing the 99 attendees to enjoy some sunny lunch breaks and warm evenings. Once again, our members and invited presenters provided an overwhelming amount of information to everyone. The willingness of ACA members to share their knowledge is very much appreciated by all. In 2013 there were two open discussion and small group discussion sessions – *Sound & Sensible Certification* (a preliminary discussion to provide a basis for our continuing efforts to address the expanding requirements of certification and accreditation) and the *Sharing our Perspectives* session. These discussion sessions garnered excellent reviews from our attendees. The *Sharing our Perspectives* session provides the basis for ACA work efforts throughout the year. The input is extremely valuable to the Board in determining the focus of our work. Summaries of these session will be distributed to ACA members. We were also pleased to have NOP Staff member, Kristin Thornblad, participate in our *Managing Mediation* session, along with Brenda Book, WSDA, and Ramkrishnan Balasubramanian, QCS. We would like to thank all of our presenters for their participation.

In addition to the long days of Training sessions, several additional meetings also took place outside of the Training. The ACA Board held a Strategic Planning Session on Monday prior to the NOP Training; the Board also met with Organic Services US regarding a proposal for a real-time database of client certification information which is used for verification of certification status (see details on these meetings on pg. 2). In addition the Government Programs Subcommittee of ACA held a working lunch to discuss their upcoming work.

A Working Group will be forming in the near future to begin the planning for our 2014 Training event. Watch the ACA Discussion Group for details & Join Us!

ACA Activities

ACA Annual Meeting & Board Election Results

We welcome two returning Board Members and one new Board Member as a result of our Election that took place in December. The results of the Election were presented at the ACA Annual Meeting held in conjunction with the ACA Training.

Scott Rice, WSDA and Jackie VonRuden are returning to the Board for an additional term. Sarah Townsend, ICS, will join the Board. Christina Dockter, ICS, is stepping down from the Board in April.

Board Strategic Planning Session

The ACA Board held the first ever ACA Strategic Planning Session prior to the ACA Training in Orlando. Brenda Book, WSDA, generously agreed to act as facilitator for this session. Our current Board members, plus past Chair Leslie Zuck, and Pat Kane, ACA Coordinator participated in the session.

The Strategic Planning session completed the examination of strengths and weaknesses and

reviewed and revised the ACA Mission Statement and created a Vision Statement for ACA. The Board will be polishing the Mission Statement further prior to formal adoption. The Board has committed to dedicated time on each Board call to complete outlining goals and the tasks involved in reaching those goals.

Website Update

www.accreditedcertifiers.org – The ACA Website — has been upgraded to be more user friendly and now includes much more information on the work of ACA. We have posted our ACA Guidance Documents, Comments to the National Organic Program and Comments to the National Organic Standards Board. A complete list of ACA

members, and all issues of the **ACA Guidewire** are also posted on the site. A rotating display of the logos of our certification agency members is featured on the Home page. We would appreciate your feedback and suggestions for additional services or information you would like to see provided on the website.

Integrity Platform Proposal

The ACA Board received a proposal from Organic Services and Intact regarding the hosting and management of an Integrity Platform system. Both companies are well known for their development and sales of the eCert certification database, which many organic certifiers use. The proposed platform is designed to provide a single place where certification validity is verified by the buyer in real time. ACA's could also use this platform to verify certification of their client's suppliers. This single platform would have up-to-date data for all certifications offered by

participating ACAs. The concept will work best with maximum participation from all US ACAs. The primary audience, users and funders of this platform would be the trader/buyers.

The Board solicited feedback from a random selection of ACA members regarding the cost, the appeal of the concept, and their ability to devote staff to manage their information in relation to the system. There was not consensus from the group on the potential effectiveness of the system. The Board is continuing to discuss this issue.

Sound and Sensible

The National Organic Program has implemented a new initiative across the department – Sound and Sensible – an effort to examine the accreditation and certification process to identify excessive requirements and practices, and revise and streamline the process – without jeopardizing organic integrity.

ACA was asked to participate in the process and we included a two-hour session at the Orlando Training to begin our work. The effort was led by Mac Stone, NOSB Chair and certifier representative and Robin Allan Foster, CCOF. The general session identified issues that could be improved in the following categories:

- the Organic System Plan
- the Inspection Process
- Materials Review
- Education vs. Consulting
- Compliance
- Audits

Small group breakout sessions provided a detailed discussion and action items on each category. A brief summary of ideas discussed included:

The Organic System Plan

Use of a shorter update form; use of understandable language rather than regulatory language; could updates be conducted over the phone and verified at inspection; allowance for changes of OSP at inspection

The Inspection Process

Scaled back inspections for low risk operations; allowance of minor OSP changes at inspection; not a need to see every document of audit trail, only to verify a system is being used

Materials Review

Continue work of ACA Working Group – Criteria for Accepting Other ACAs Materials Review Decisions; develop consistent review criteria; plan for reconciliation of differing outcomes; OMRI act as overseer of quality control.

Education vs. Consulting

Certification system needs to be more user friendly; interaction of inspector and client plays key role in clients understanding the issues; educate NOP and NOP auditors regarding benefits of client education.

Compliance

Noncompliance notices should only be used for issues that affect organic integrity; issues such as the need for additional information should not be a noncompliance; NOP Penalty Matrix should be revised as it is overly strict; over reliance on noncompliance notices creates an adversarial relationship between certifiers and clients.

Audits

More documentation does not necessarily indicate compliance or noncompliance. Cross training of inspectors, auditors and certifiers would improve the audit process. ISO process at farm level is not workable. NOP should conduct pre-assessments to identify problems and notify ACA prior to site visit; NOP should have quicker response time for audit reports; scale audit fees for smaller ACAs.

This session of the ACA Training received very good reviews – everyone appreciated the brain storming session.

There is currently a Sound and Sensible Working Group developing specific criteria to address the above issues. Their work will be shared with the full ACA membership when complete.

Sharing Our Perspectives

For the 2nd year *Sharing Our Perspectives* was a featured event at the 2013 ACA Training. Attendees were asked to submit questions prior to the Training in the following categories:

- | | |
|-----------------|-----------|
| Crops | Livestock |
| Accreditation | Materials |
| Inspection | Handling |
| Residue Testing | |

A general discussion session was held to identify the particular issues, then participants broke into small groups to discuss the issues in depth. The outcome of the discussions provided information regarding solutions to common problematic issues, identified issues that the ACA Board might address; and identified topics and working groups that can be initiated in the future. Summaries of the various topics follow:

Questions for Discussion	Reponses / Action Items
Crops	
Do certifiers allow "old wood" that's been laying around the farm since pre-certification to be installed post certification without obtaining verification that it has not been treated? Do you allow it as being "grandfathered" in?	Old wood left on a farm from prior to certification cannot be used in the organic production system without the operator being able to demonstrate that the wood is not treated. If the answer is uncertain we should not allow the woods in an organic production system. Might ask an inspector to observe the wood to assess if it was treated or not.
Should greenhouses be exempted from the existing crop rotation regulations? If not, what could a certifier recommend for potted plants to comply with this part of the regulation.	Crop rotations in a greenhouse needs to address the functional requirements of §205.205 for all uses of permanent cropping systems. Plug or in pot production is not a permanent cropping system.
What detail should be on a certificate and or on a product profile list often attached to a certificate? "Mixed vegetables" instead of individual vegetables listed.	Initiate a Working Group to develop certificate and product description level of detail.
Livestock	
Guidance and / or clarification on poultry issues seem to be stalled at NOP. What can ACAs do to address some of the more pressing issues.	Initiate a working group to address issues. Create some baseline minimum requirements; all agree to uphold the requirements. Talk to clients about being willing to comply; use pasture rule as example for compliance now rather than imposing regulations later.

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~ Thank You ~ to the following New & Renewing Members

Americert International
 Australian Certified Organic
 CCOF Certification Services
 CERES GmbH
 ECOCERT SA
 Georgia Crop Improvement Association
 Idaho Department of Agriculture
 Institute for Marketecology (IMO)
 International Certification Services
 Iowa Department of Agriculture
 Kentucky Department of Agriculture
 Marin County Certified Organic
 Minnesota Crop Improvement Association

Monterey County Certified Organic
 Nevada Department of Agriculture
 OCIA International
 Oklahoma Department of Agriculture
 Organic Materials Review Institute
 Organic Trade Association
 Organic Valley
 Organically Grown Company
 Quality Assurance International
 Utah Department of Agriculture
 Washington State Department of Agriculture
 Wolf, DiMatteo & Associates

Sharing Our Perspectives (cont.)

Questions for Discussion	Reponses / Action Items
Accreditation	
What protocols are ACAS using for issuing non-compliance letters. We find the provided matrix is often too general.	At next ACA Training display or present various agency's NONC and adverse action letter templates side-by-side for comparison and discourse.
The Reinstatement process for operations appears to be a "tricky" one. How do ACA's insure/document that operations have ceased selling product as organic while suspended and what steps are taken to decrease the length of reinstatement process time.	Request formal guidance from the NOP regarding: <ul style="list-style-type: none"> • What to do when we don't recommend the reinstatement of a suspended applicant's certification. • When, during the suspension period, a suspended operation can reapply for certification/request reinstatement, if at all.
How do we provide feedback to NOP regarding the process used in our accreditation audit.	Request that the NOP establish a formal system for certifiers to evaluate/provide feedback about their audits/auditors. Provide an opportunity for certifiers to discuss their audit experiences with one another then provide joint feedback to the NOP. Develop a working group for discussing accreditation issues/fostering good relationships with the NOP/helping one another remain in compliance and/or come into compliance if an agency has been issued a noncompliance by the NOP.

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Sharing Our Perspectives (cont.)

Questions for Discussion	Reponses / Action Items
Materials	
What can ACA's do about misleading input labels (i.e. potting soil says "organic" but contains prohibited substances)?	We can ask NOP to investigate such complaints. Prior to asking NOP we should discuss as a group to be sure they are not inundated with the same complaint.
How do we encourage consistency of material review decisions among certifiers?	<p>Identify material reviewer (contact person for material related questions) at each ACA. Compile into a document to be shared among ACA's.</p> <p>Sharing tools/forms/other resources for material review .</p>
Inspection	
What internal training do you conduct for inspectors and what "guidelines" do you go by when hiring a new contract inspector? (i.e. they must shadow another inspector 3 times, etc...)	<ol style="list-style-type: none"> 1. IOIA Trained; NOP Qualifications; ISO 9000 training; experience within the scope you are inspecting (crop producer if inspecting crops) 2. For new inspectors – should be witness audit of new inspector; new inspector should witness expert trainer. 3. More effort to partner experienced inspectors with new inspectors for training. 4. Separate training into modules so people can take what they need. Track intensively on a specific scope. 5. Administer written test – knowledge of regulations and inspection process. 6. Annual training by certifiers (in house). 7. Maintenance of training logs. 8. Certifiers should be willing to work with inspectors on improvement points. 9. Renewal of inspectors' credentials should be part of process of including continuing education. 10. Recognize watching a good inspector is the best way to teach inspectors. <p>Guidelines for formal mentoring and Witness Audit program are needed. Should be a joint effort of IOIA & ACA. Needs to have enough flexibility to tailor to individuals need and personal one on one training. Joint IOIA & ACA Working Group.</p>

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Sharing Our Perspectives (cont.)

Questions for Discussion	Reponses / Action Items
Handling	
<p>What type of documentation are certifiers collecting to verify the NOP requirements on packaging?</p>	<p>Information or letter of guarantee from packaging company about whether there are prohibited materials on packaging.</p> <ul style="list-style-type: none"> • request a letter of guarantee to verify whether any prohibited materials are used in packaging; ask on OSP and review during initial review. Waxed boxes may require more information to determine compliance. Case-by-case • Do they have any technical or functional affect on the product? If not, do not ask for any other verification. • Some fruit boxes are impregnated with prohibited treatments to have an effect on the food - grapes, bananas. <p>Develop and share a list of packaging that may be of concern so ACAs can check this list when needed for guidance.</p>
<p>Do you treat a farmer who does field packing into a retail package as a processor/handler?</p>	<p>No - just for crops</p> <ul style="list-style-type: none"> • Somewhat case-by-case depending on whether they are bringing it in washing, then packaging, could be a handler in addition to a crop producer. • If buying, repackaging, and selling - need to be handler. <p>Clarification is needed on when to change scope at an on-farm growing and harvesting environment.</p>
<p>Apple grower with 12 different varieties of apples, do you list all different varieties on the certificate?</p>	<p>Sometimes list commodities or categories of products. Do not just list "produce" - but use "fruits" and "vegetables". Depending on how large the operation is. Tailor to the client's request.</p> <p>Marketers like to see it by commodity because of different certification categories. Helps for anti-fraud. More important to have current certificates.</p> <p>For finished products brand names are sometimes listed. This depends on the clients request due to confidentiality.</p> <p>Certifiers agree that they can share information if needed.</p>

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Sharing Our Perspectives (cont.)

Questions for Discussion	Reponses / Action Items
Handling (cont.)	
Different types of categories of processors/handlers, such as buying/selling, processing own, etc. on certificates.	Some certifiers have different categories listed such as marketer/trader, processing, however without the definition of these, it's hard to know what they mean.
Residue Testing	
Do certifiers test for all the substances on the prohibited list? To facilitate this requirement, we need to consider budget constraints, timeliness, and labs who may provide this service. We would like to identify those substances that are registered in the state, and therefore more likely a potential product to be used, rather than test for ALL. Additionally, does anyone have a SOP they would be willing to share?	<p>No, don't need to test for all substances; consider only those regulated in your state or known soil residuals.</p> <p>Use pesticide division employees of state programs for sample collection. Private certifiers should work more closely with state agencies. State agencies more likely to have an Standard Operating Procedure.</p> <p>Use staff inspectors. There is a liability with contracted inspectors collecting samples.</p> <p>Control costs by doing sampling all in a group.</p> <p>Utilize NOP Program USDA Lab.</p>

Join Us!

ACA Meeting

April 9, 2013

5:30 – 7:30 pm

Hilton Executive Towers
Portland, OR