



International Organic Inspectors Association
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IOIA Input to Sound & Sensible Discussion at NOSB meeting in Louisville, Kentucky

My name is Dr. Ib Hagsten, an independent organic inspector, who currently serves a second term as chair of IOIA, the International Organic Inspectors Association. Ladies and gentlemen, distinguished members of the NOSB and the dedicated staff of NOP, thank you for the opportunity to elaborate on a few issues of particular interest for the organic inspectors during the involved, engaged, and delightfully-open dialogues in a face-to-face meeting in Portland in April and many committee and sub-committee conference calls during the intervening five months.

IOIA has appreciated the opportunity to work with NOP leadership, NOSB representatives, and a variety of interested working group members from ACAs (Accredited Certifiers Association) on the NOSB's Compliance, Accreditation and Certification Subcommittee Proposal entitled "Sound and Sensible Initiative Discussion Document."

There are *three key issues that we at IOIA believe strongly need to be improved and stream-lined* in order for the organic certification process to become more sound and sensible – for the benefit of the producer, the consumer, the certifier, the NOP, and the organic inspectors, who are the only "eyes, ears, and noses on the ground" in the program.

First, it would be quite facilitative when all of the NOP auditors learn to "sing from the same page," which means communicating uniformly with the certifiers the new expectations on which they have recently been trained. The certifiers appear eager to implement sound and simple processes and procedures as long as they do NOT detract from the organic integrity assurance. Currently the certifiers seem to be "sitting on pins and needles" wondering how their next NOP auditor is going to interpret their paperwork, thus little progress will be made until NOP communicates more uniformly.

I was encouraged to hear from Miles McEvoy, when we had a personal communication in June, that the week-long auditor training had been very successful, so I guess time will tell if the auditors, when they arrive at the various certifiers, will all be singing off the same pages. We have been encouraged to see the focus on inspector qualifications throughout the numerous discussions during the last six months; however, IOIA has noted a lack of commensurate emphasis on improving and uniformity of reviewer qualifications and training.



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Secondly, when we inspectors are on the farm and there are legitimate discrepancies between the OSP (Organic System Plan) and the observed conditions or practices of the operation, how do we “fix it”? The discrepancy most likely is an improved farming practice or an improved crop rotation that is in the process of being implemented on the farm. It is a “good move,” yet not the same as the client listed in their OSP.

How do we, the inspector on the ground, reconcile that, “altered crop rotation”?

- (1) Do we compliment the farmer on lesson learned, list the new practice in the report, and leave his OSP alone?
- (2) Do we encourage the farmer to change his OSP wording while we are present? Now his OSP is compliant with current practices, great. No, wait –
- (3) How do we get the updated information to the certifier? (a) Tell him to mail in the updated OSP in the middle of the review process – and confuse everyone; (b) Take a copy of his OSP to return with the report – and now he is missing his OSP, which is a non-compliance; or (c) Do we, the inspector’s, make the change – and inform the certifier of his updated OSP status, that is now in compliance?

Our industry is waiting for the NOP to help streamline this “sticky issue” that currently is causing multiple e-mails (or in the case of Amish clients, multiple postcards or letters) wasting significant certifier time, alienating the farmer, who is farming well with the new knowledge, while everyone feels “bad” because the term “non-compliance issuance” is in all the communication – yet, as in this example, no organic integrity issue ever was implicated.

Lastly, at the end of the inspection, we inspectors are required to complete an exit interview with a responsible person for the operation, let’s say the farmer. The exit interview is supposed to serve three functions:

- (1) Inform the certifier of (a) observed non-compliances (with reference to the NOP manual, section and number), (b) changes in the OSP, since it was submitted more than six months previously before the growing season started and all the weather-related changes necessitated altered farming practices, crops, etc., and (c) additional information collected to substantiate new or altered products or practices;
- (2) Inform the farmer of our findings and what we are reporting so (a) he or she understands that we observed things that he can expect to have the certifier request correction or implementation of, (b) the issue is raised to added awareness in his mind of the concern observed – and – thus allow



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him to verbalize the issue with the inspector to assure that he accepts the “charge” or help the inspector to better communicate with the certifier the farmer’s perspective before the numerous “back and forth” communications take place or, even worse, a letter of non-compliance is issued where the same “offence” is stated three times from three different angles of the OSP interpretation, yet really is only one “offence.”

(3) Allow the inspector to comment on “things well done” – because no matter how many discrepancies are observed and noted, there is always something he does well, and the “medicine always goes down better with a spoonful of sugar” (as we learned in the movie, “The Sound of Music”).

As someone who inspects independently for multiple certifiers, I have witnessed a tremendously varied set of EXIT INTERVIEW forms … from basically a blank piece of paper to somewhat detailed forms. However, having polled several of my fellow inspectors the consensus was, “each certifier has done a poor job of communicating with me **their** expectations from the Exit Interview form.”

The **exit interview** form should be the “cap-stone” of the on-farm inspection. It should be the first place the reviewer (back at the certifiers) should look, and it should serve as a great guidance document for the reviewer. It seems as if the reviewer often is forced to thumb or scroll through extraordinarily many pages of material to hopefully find the good, the bad, or the ugly. And, when they start a necessary non-compliance letter issuance, the farmer is often quite surprised, as he was not apprised of the issue(s) at the end of the inspection.

Some guidance from the NOP seems in order to assist the various certifiers in improving the capture of key elements useful in the Exit Interview form and process. It does not have to be a one-form-fits-all, yet knowing the key expectations certainly would help make the organic inspection process more simple and more sensible for all parties, the farmer, the certifier, the NOP auditor, and the on-the-ground organic inspector.

Respectfully,

Margaret Scoles

*Margaret Scoles
Executive Director*

A handwritten signature in black ink that reads "Ib Hagsten".

*Ib Hagsten, Ph.D.,
Chair, IOIA Board of Directors*