



GROWING ORGANIC EXPERTISE IN IOWA

ORGANIC INSPECTION VIDEO SERIES RUN OF SHOW

Tuesday, July 13, 2021 | 9:00 a.m. – 3:00 p.m.
Becker Lane Organic | 15346 Becker Lane, Dyersville

9:00 – 9:15

Introductions (IOA staff/board and film team)

Jude Becker, Jack Knight, David O'Shields, Prushia Golden

9:15 – 10:15

Farmer interview

Background/bio w/ Jude

10:15 – 10:45

Before the inspection – office/desk??

The inspection is just a part of the Organic Certification Process. Prior to inspection, an operation must:

1. Develop or update an Organic System Plan (OSP) – **COPY** - describes how your farming, handling and/or processing practices meet organic standards. The OSP should clearly explain your operating plan, including information on crops, animals, harvests, sales, records, soil-building practices, pest management, health care, pasture, and any other practices related to organic production.
2. Complete an application for certification – **COPY**
3. Implement the OSP

If the initial review of the application appears to, or may be able to comply with the regulations, then the certifier schedules an onsite inspection. The inspection process evaluates implementation of the OSP and compliance with USDA organic regulations.

Every organic operation must be inspected each year. The inspector verifies that the operation's plan accurately reflects the operation and that the farmer is following the plan. Organic inspectors are trained to look critically at all aspects of an operation.

COPY Prior to the on-site inspection; operations should review any communications from your certifier that you have received in the past year. Each year you will receive a letter that addresses your certification status.

- Does this letter describe any areas in which your operation was found to be other than fully compliant by the previous inspection and review process?
- Have you resolved the issues that were raised after your previous inspection?
- Have you responded in writing to any requests made by your certifier?

Ensure that you can devote the time and attention needed to complete the inspection.

- Make prior arrangements for someone else to handle work-related tasks and/or family commitments.
- Have all your records ready and accessible
- Provide a space where you and the inspector can comfortably review records.
- Be prepared to provide easy and prompt access to all fields, buildings, and storage areas, both on- and off-farm.

VOICE: Organic inspections play a vital role in ensuring organic integrity. Inspector visits to organic farms and processing facilities are often the most direct contact that certifiers have with organic operations.

VOICE: Inspections are not consulting visits. Inspectors may ask questions, collect and provide information, and explain the regulations or the certifier's requirements. Inspectors are prohibited from advising the operator on how to overcome barriers to certification.

VIDEO – Jack coming up the driveway; knocking on the door; introductions

VIDEO – in the house/barn?

10:45 – 11:15

Day of inspection – in the house/barn?

Opening Meeting: This is the inspector's opportunity to set expectations and answer the applicant's questions. The NOP considers opening meetings to be a best practice for all inspections.

1. Defines the role of the inspector,
2. Communicates confidentiality of all information, and
3. Outlines the planned inspection activities.

The purpose of the on-site inspection is to:

1. Assess if the operation complies or can comply with organic regulations;
2. Verify that the OSP accurately reflects the operation's activities; and
3. Ensure that prohibited substances have not been used.

Review documents: **COPIES**

- Organic Certification Plan (OSP) – includes:
 - Materials list outlining all substances used during the production of organic crops and livestock, including composts, fertilizers, insecticides, fungicides, health-care products, and feed.
 - A map of all farmlands and production areas, illustrating how organic products are protected from contact with non-organically managed land.
 - Complete field history for growing areas and pastures used in organic production, which includes plot size, crops, and any substances that have been used.
 - Biodiversity plan outlining natural resource conservation.
 - The OSP is a part of the certification application.
- Certification Determination Letter (CDL)-previous year (things that had to be done before current inspection – or remedied on the spot)

- Initial Review Letter (IRL)-new things to patch up from application process/OSP; and/or review past problems and audit trail
- Review letters from previous year.
- Other?

11:15 – 12:00

Recordkeeping: Seed to Sale Audit – COPIES

- List of crops being grown,
- Input application records (material, source / brand name / manufacturer, regulatory status,
 - Field location, date, and rate or quantity used)
 - Seeds (crop and cover crop), planting stock, annual seedlings, and transplants
 - Seed coatings and inoculants
 - Greenhouse materials (e.g., potting soils or soil mix ingredients)
 - Crop nutrients and soil amendments
 - Pest management materials
 - Beneficial insect releases
 - Natural, organic, or plastic mulches
 - Any other materials applied
 - Seed, planting stock, and transplant records
 - Documentation that seeds and annual transplants are certified organic
 - For any non-organic seed or planting stock used, documentation of:
 - Your unsuccessful search for commercially available organic seed or planting stock (most certifiers require documentation of non-availability from three sources), and y
 - Verification that the seed or stock used is not genetically modified or treated with prohibited materials
 - Documentation of compliance of any inoculants or seed coatings (non-GMO status of inoculant organisms and allowed status of all seed coating materials)
- Input purchase/source records of all in-puts used for crop nutrients, pest, disease, or weed control
 - Receipts
 - Invoices
 - Delivery tags
 - Receipts or logs recording the pick-up or delivery of free materials
 - Labels and/or documentation demonstrating that each material is allowed for use in organic production.
 - Note that manure must either be composted according to NOP standards or its date of incorporation documented to comply with the required number of days before harvest of a crop intended for human consumption.
- Audit trail documents that track products from the field of origin to final use or sale. A random audit is part of inspection procedures. It may require the following.
 - Field, planting and production records
 - Harvest and yield records
 - Post-harvest handling records
 - Storage records

- Transport records
- Sales records

12:00 – 12:30

Lunch: ?? (Roz ORDER – delivery??)

12:30 – 1:00

Operations Tour: Row Crops

- The inspector will review EACH production unit, facility and site where the operation produces or handles organic products
- Obtain crop/plant/soil samples
- Inspect equipment and machinery in the barn and the high tunnel (tractor/tiller), must demonstrate no comingling – *VOICE*
- **Buffer Area Management:** Provide examples of different types of buffers.
Jack will discuss buffer management and rules/regulations pertaining to buffers
 - Buffer zones are required under NOP rules if there is a risk of contamination, via drift or flow, of substances not allowed under organic regulations.
 - Situations in which buffers will likely be required by the certifier, according to NOP rules, include: An organic field bordering
 - a conventional field on which prohibited substances are being used.
 - a roadway to which prohibited substances are applied (usually to control weeds).
 - residential housing in which prohibited substances are being applied.
 - or is immediately adjacent to, fencing made of lumber treated with prohibited substances.
 - Buffer zones between organic crops and non-organic crops must be of sufficient size and structure to prevent drift or runoff of non-approved substances.
 - Although there are no specific size requirements, typically a buffer zone is 25- to 30-feet wide.
 - The organic producer can grow non-organic crops in the buffer zone, leave it fallow, or plant this area to hedgerows, windbreaks, meadows, or beetle banks, as appropriate.
 - If a crop is taken from the buffer zone it will need to be harvested separately from the organic crop and the producer must document that it was harvested, stored, and sold as non-organic.
 - If the organic certifying agency has determined that a buffer is needed, they must also approve the design of the buffer.
 - Opportunity to implement conservation practices that benefit the operation by creating habitat for beneficial organisms (birds, pollinators, or parasites and predators of crop pests), as well as providing a barrier against weed seed migration, preventing wind damage to crops and protecting water quality.

Operations Tour: Livestock

- Animal lists, including livestock or poultry descriptions and/or numbers and identification methods

- Source of poultry and/or livestock, including breeding, birth, hatching, and/or purchase records
- Feed harvest and storage records
- Feed rations for each type of animal during each stage of growth and development
- Feed and feed supplement purchase records and documentation that they are certified organic or allowed
- Drinking water, including source, additives, potential sources of contamination, and results of any water analysis
- Audit trail documents that track animals or animal products (harvest or slaughter, processing/post-harvest handling, trans - port, and sales records)
- Housing and living conditions, including grazing management and outdoor access records
- Animal medications, including a list of all products used or that may be used (everything in your medicine cabinet or refrigerator, with product names, ingredients, manufacturers, and regulatory status)
- Health management records, including vaccinations and all other materials, veterinarian bills, purchase invoices, records of medication used, reason for use, and animal identification
- Marking and segregating methods for animals treated with prohibited materials
- Soil management, erosion control, crop nutrition, and pasture management
- Manure management (must not contribute to contamination of crops, soil, or water)
- Pest management, including parasite management
- Off-site processing records, including slaughter, cold storage, and meat packing (These activities must take place at facilities that are already certified organic, or they must be inspected as part of your operation.)
- Product or animal sales record COPY
- Labels, if applicable

1:00 – 1:30

Recordkeeping

During an inspection, the inspector reviews records of actual practices and compares those to the practices described in the producer's OSP. Some examples of the types of records that need to be available for review at inspections include audit-trail documents such as seed, fertilizer, and soil amendment documents; feed receipts, shipping records, sales invoices; and soil-, tissue-, or water-test results, if applicable.

Voice-over: There are three types of documentation that enable certifiers to verify an operation's compliance with the National Organic Program Regulations:

1. The producer's records of farm/livestock operation activities
2. The Organic System Plan
3. Audit trail documents (e.g., purchase invoices, organic certificates, contracted custom application or harvest records, soil test results, sales invoices, etc.)

Documentation - **COPIES**

- Field locations (maps), acreages, and estimated yields
- Field history or land use documentation, if any new land is added this year

- Field activity logs for all practices performed (cultivation, weed control, use of manure or fertilizers, spraying, pruning, beneficials released, etc.)
- Soil management activities, including crop rotation and erosion prevention activities
- Pest management activities for control of crop pests
- Review OSP documents:
- Organic Integrity: Documentation of measures to avoid contamination and commingling, as applicable to your operation
 - Information about neighboring land use
 - Prevention of contamination from borders
 - Production, harvest, and sales records for buffer crops, transitional or conventional
 - Material storage: adequate separation of allowed materials from any non-allowed products: irrigation water and system for contamination prevention (i.e., diagram of valves, back flow prevention, and/or documentation of purge or flushing procedures to prevent contamination from shared water systems where fertilizers or other prohibited materials are used)
 - Clean-out or purge logs for equipment used for both organic and conventional operations
 - Documentation of procedures to verify the absence of sanitizer residues, if sanitizers are used
 - Certification documentation of any organic product purchased for resale
- Labels and labeling: Printed packaging, bags, boxes, ties, bands, and stickers, lot numbering of retail and bulk products, if applicable.

1:30 – 2:15

Exit Interview

During the exit interview, the inspector communicates any potential non-compliances observed, and requests any additional information that may be missing from the OSP.

- If significant information is missing, the inspector should note this in the inspection report and discuss this as a concern during the exit interview.
 - Minor non-compliance
- Continuous improvement process: inspectors often discover new information or documentation during onsite inspections. The inspector may accept additional OSP updates during the inspection, up until the start of the exit interview, and should provide any new information received onsite to the certifier.
- Once the inspector finishes the inspection report, they provide a copy of the report to the operator and to the certifier for review. The certifier will evaluate the inspector's findings when making a final certification decision.

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2:15 – 3:00 p.m.

After the inspection

- The certifier evaluates the inspection report, the OSP, the results of any analyses conducted, and any additional information provided. The review of the inspection report may lead to different paths, each of which may require additional evaluations
- Certifiers Decision: After assessing whether the operation appears to comply with the organic regulations, the certifier makes one of the following certification recommendations:
 1. Certification, if the operation is fully compliant;
 2. Certification with conditions, if there are minor, non-violative issues;
 3. Notice of Noncompliance for correctable violations. A Notice of Noncompliance allows the operation to submit a response with proposed corrective actions, typically within 30 days of the date of issuance.
 4. Combined Notice of Noncompliance and Denial of Certification for non-correctable violations.

USDA Organic Certification Cost Share Program: OCCSP provides cost share assistance to producers and handlers of agricultural products who are obtaining or renewing their certification under the National Organic Program. Certified operations may receive up to 50 percent of their certification costs paid during the program year, not to exceed \$500 per certification scope.

- In Iowa, apply through the county FSA office

Start of each video:

- B-roll: IOA Logo, GOE Organic Inspection Video Series (# of #)
- **Voice?:** What Is Organic? Organic is a labeling term that indicates that the food or other agricultural product has been produced through methods approved by the USDA National Organic Program. These methods integrate cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity. Synthetic fertilizers, sewage sludge, irradiation, and genetic engineering are prohibited.
- All USDA Certified Organic operations are inspected on an annual basis to ensure production and processes are in compliance with USDA National Organic Program guidelines that guarantee the integrity of products that carry the USDA Organic label.
- The Growing Organic Expertise in Iowa Organic Inspection video series was developed to demonstrate the organic certification inspection process.

End of each video:

- **Voice:** IOA's "Growing Organic Expertise in Iowa" inspection video series is made possible with grant support by the National Institute of Food and Agriculture, U.S. Department of Agriculture through the North Central Region SARE program

- *Print:* This material is based upon work that is supported by the National Institute of Food and Agriculture, U.S. Department of Agriculture, under award number XXXX-XXXXX-XXXXX through the North Central Region SARE program under project number XNC16-XXX. USDA is an equal opportunity employer and service provider. Any opinions, findings, conclusions, or recommendations expressed in this publication are those of the author(s) and do not necessarily reflect the view of the U.S. Department of Agriculture.

SARE Logo: <https://northcentral.sare.org/north-central-sare-logo-and-acknowledgement-information/>

- *Voice & Print-final screen/b-roll?* The Iowa Organic Association is a statewide, 501(c)3 non-profit organization committed to advancing organic agriculture and food systems in Iowa through education, advocacy and community cooperation. Our diverse membership is dedicated to expanding the organic movement and enhancing our land, water, air and rural economies. For more information, visit www.iowaorganic.org.
- Video credits

Voice-over in post-production

Prevention of Commingling and Contamination: Organic producers should be aware of potential sources of product mixing or contamination, also referred to as threats to organic integrity, and take measures to prevent and avoid each potential problem. Some risks may be under a producer's direct control in a split operation, where conventional production is under his or her management.

Other risks call for risk-management measures such as notifications, establishment of communication, and making requests for the cooperation of others – among them neighbors, county road departments, and utility companies – to minimize opportunities for contamination.

As with other types of recordkeeping, documentation should be available for inspection to support the information recorded by producers. In the case of contamination preventions, these may include letters or statements regarding procedures from businesses providing contract services.

Inspection documents: <https://www.iowaagriculture.gov/AgDiversification/organicCertification.asp>

Farm map:

