

Behind the Lawsuit

Arthur Harvey, an organic blueberry grower, longtime IOIA inspector member, former Alternate to the IOIA Board, and current chair of the IOIA Bylaws Committee, was interviewed regarding his lawsuit in the December 2004 issue of Organic Business News. In the interview, Harvey said that he became increasingly concerned when he saw the NOP taking more authority than the OFPA allows.

"I had to do this, or otherwise the government could get away with anything they wanted," Harvey said. "It just seemed to me that it was necessary to do it."

What particularly bothered him was the NOPs allowance of synthetics in organic finished products. While he is not opposed to some synthetics being used in organic handling, he believes the NOP has gone much further than OFPA allows. In addition to the 38 synthetic ingredients on the National List, he said, the USDA now allows 315 synthetic food contact substances containing chemicals that have been approved by the FDA but would never 'pass muster' in the organic industry.

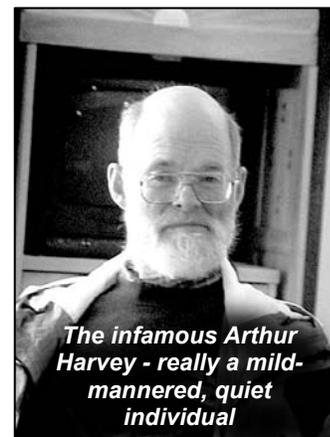
Arthur is pleased with the results of the suit. His only disappointment is that more certifiers did not back him. Only NOFA-Mass joined in the supporting briefs. The Rural Advancement Foundation Int'l (RAFI), the Center for Food Safety, Public Citizen, Sierra Club, Organic consumers Association and Beyond Pesticides all files 'friend of the court' briefs in the case.

Michael Sligh, Director of Sustainable Agriculture Policy for RAFI and founding chair of the NOSB stated, "We were compelled to submit a 'friend of the court' brief in this case to urge the court of appeals not to cede to USDA new powers not provided for in the law. Basic principles of good government process and the integrity of the USDA Organic seal were at stake." Harvey supports adequate phase out periods to give manufacturers time to make changes.

Arthur has been and remains opposed to an adversarial stance with OTA on the issue. However, in a telephone interview, he said he disagreed with OTA's comments on the court's decisions, specifically regarding the use of synthetic ingredients in processed foods and the 'commercial availability' issue. In his view, a stricter interpretation will create a demand for organic versions of those same ingredients. He sees this as having a net positive impact on organic family farms and not, as OTA has expressed, endangering those farmers.

Arthur recently posted these comments (regarding chlorine use) to the IOIA list serve: "This discussion is a classic example of the tension between a consumer-oriented certification and a profit-oriented one. The Rule is filled with provisions that favor special interests and large companies. It also has conflicting provisions to uphold organic integrity. Each inspector has to make a choice which provisions to focus on, and each certifier also. The certifiers have a powerful incentive to side with their clients, but some certifiers retain some loyalty to consumers... This leaves the lonely conscientious inspector as the last feeble line of defense for the consumer."

"IOIA gives us the change to at least know what is happening. It remains to be seen whether we can do anything about it."



The infamous Arthur Harvey - really a mild-mannered, quiet individual

OTA's Position

After Congress passed OFPA in 1990, the USDA published organic standards in proposed form in December 1997 and again in March 2000 before adopting the NOP Final Rule in December 2000. The Final Rule was a carefully crafted compromise among various interests. It took into account numerous changes in organic production and processing that had occurred in the ten years since Congress passed OFPA. Courts have traditionally given substantial discretion to regulatory agencies to interpret laws to meet evolving circumstances within the framework of Congressional intent.

Some controversy has arisen around OTA's position and statements on the Harvey vs. Veneman lawsuit. Numerous posts appeared on the IOIA Forum regarding a fundraising letter that OTA put out in early January. In it was a paragraph stating:

"Regulators will propose changes that need to be responded to, legislators who don't understand how organic contributes to the health of the economy will need to be engaged, consumers will be exposed to misinformation that needs to be corrected, and organizations who have other agendas will try to undermine us. Look no further than the latest NOP directives, or the Harvey v. Veneman lawsuit, to see why the industry needs to stay unified and strong."

Prior to filing the lawsuit, Harvey offered to consult with OTA about it and kept the leadership informed as it proceeded. According to Harvey, at no point did OTA respond to his overtures for comment or input. Further queries to OTA elicited this response from executive Director Katherine DiMatteo:

"Arthur Harvey presented his case for this lawsuit and subsequent appeal to OTA through our committee structure and there was not support from OTA members for taking this action. In addition, public policy is best changed through public discussion and debate (which did happen during the 12 years preceding the implementation of the National Organic Program rules) not through the courts. OTA is not attacking Arthur Harvey but the lawsuit has set changes in motion that require that OTA analyze, gather data on its impact to members, respond to inquiries from inside and outside the organic community, and develop next steps that continue to build a strong organic industry. Therefore the lawsuit, the directives, the Hudson Institute accusations, etc., are similar in their effects on OTA and its members. It is unfortunate that some IOIA members perceive OTA's actions as they do. As membership organizations it is almost impossible to have 100% agreement. That's why we strive for consensus but sometimes have to move forward based on majority opinion."

Some organic industry insiders take is that Oat's concern is that of losing control of the message, i.e., they want to control the discussion, or fear anti-organic forces will come in and do a hatchet job on the industry similar to what occurred in the infamous "20/20" interview, where information was presented out of context.

Chronology of Harvey Suit

October 23, 2002 – Civil lawsuit filed in US District Court for District of Maine

January 7, 2004 – US District Judge D. Brock Hornby granted summary judgment for Secretary Veneman and against Mr. Harvey on all 9 original counts.

March 8, 2004 – Harvey files notice of appeal with First Circuit Court of Appeals

January 26, 2005 – First Circuit Court rules in favor of Harvey on 2 of 7 resubmitted counts and remands a 3rd count back to the lower District Court.

Harvey, from page 1

Impact on the Organic Community

Once implemented, the decision handed down in this case will have tremendous impact upon not only the specific standards that were ruled on but also on the entire regulation. This ruling could be bad for business. The two counts on which the court ruled that the regulation is inconsistent with the original law are intimately connected to two of the major profit centers for organic agriculture: organic processed food and the entry of new dairy cows and herds into organic production.

No synthetics in processed foods: As the court affirmed, the law prohibits the use of synthetic additives in the processing ("handling") of organic foods. This conclusion is incontestable. Despite two proposed and one final rule that circumvented the OFPA's prohibition on synthetics in processing, the USDA has not used the preamble to justify or support its decision that synthetics could be allowed.

Michael Pollan wrote a *New York Times Magazine* article entitled "*The Organic-Industrial Complex: How Organic Became a Marketing Niche and a Multi-Billion Dollar Industry*" on May 13, 2001 that addressed this subject. An excerpt:

Gene Kahn (of Cascadian Farm fame) served on the USDA's NOSB from 1992 to 1997, played a key role in making the standards safer for the organic TV dinner and a great many other organic processed foods. This was no small feat, for Kahn and his allies had to work around the 1990 legislation establishing organic standards, which prohibited food additives. Kahn argued that you couldn't have organic processed foods without synthetics. Several of the consumer representatives on the standards board contended that this was precisely the point, and if no synthetics meant no organic TV dinners, the TV dinners were something organic simply shouldn't do.In the end, it came down to an argument between the old movement and the new industry, and the new industry won: the final standards simply ignored the 1990 law, drawing up a "national list" of permissible additives and synthetics, from ascorbic acid to xanthan gum. "If we had lost on synthetics," Kahn told me, "We'd be out of business."

All successive NOSBs followed suit in this collective denial, and now the list of synthetics allowed in processing totals 38 compounds (including ingredients and sanitizers).

So the industry loses 205.605 (b), which is the list of synthetics allowed in processed foods. The impact is that there is no longer any allowance for these as ingredients at all, although they might still be allowed as processing aids. It should be noted that the ruling did NOT impact the crops or livestock lists, which do have extensive lists of allowed synthetics.

206.605(b) includes things like sulfur dioxide in organic wine, which the majority of vintners claim is essential for shelf life; pectin (low-methoxyl); and bleached lecithin, a significant ingredient. It includes vitamins and minerals as synthetics, currently added to many organic products. In some cases, other statutes of the law might require certain vitamins or minerals, such as those of the Federal Meat Inspection Act or the Federal Food, Drug and Cosmetic Act. Certifiers will need to establish policies and develop consistent verification protocols relevant as to how such mandated uses are to be documented, if at all. Many of the identified synthetics such as pectin, ascorbic acid, and lecithin seem fairly innocuous, and even 'natural'. However, if the material is defined as a synthetic by the FDA, it is a synthetic.

The National List allowance for adding up to 100ppm of sulfites to wine is different than all other allowed synthetics. Because the original OFPA expressly prohibited sulfites in any processed product, a friendly rider was used in the 2000 ag appropriations bill to amend OFPA to allow up to 100 ppm sulfite in wine. It was a surgical insertion that had no baggage and left little wake. One could make the case that the allowance for sulfites is statutory, and while the court case essentially threw out 205.605(b), the sulfite provision has statutory standing and should persist.

Whole herd conversion: Some industry observers believe it is unlikely that the industry will contest the dairy conversion ruling. One line of reasoning is that most of the dairy people who wanted to transition have already done so. It is not in the interest of the currently certified dairy producers to fight to make it easier to get into the marketplace. The industry might just shrug their shoulders over this one and it will simply become the new status quo. This ruling does make it a lot harder for new dairy producers to come into organic. It also makes inspection and certification of dairy a lot easier, since it will no longer be necessary to verify the 80%-20% over 9 months. It will be 12 months of organic feed, period.

Commercial availability: The intent of this clause was to support demand for all organic ingredients while recognizing that commercial availability implies not all ingredients must be organic. The marketing scheme of "100% Organic" was added as a good faith incentive for those in the marketplace to get to fully "organic" status. Individual review of each non-organic ingredient in the 'organic' category will now be required. This could hamper processors until enough organic alternatives become available and the NOSB could be overwhelmed in dealing with making recommendations for additions to the National List.

From the Organic Trade Association's (OTA) point of view, the lawsuit will have significant impact on organic businesses and they expect confusion in the marketplace. OTA spokespersons say that one of the outcomes of

the lawsuit will be products with less organic integrity as few products will qualify for the "Organic" status. Therefore the market could drive product choices to the lowest common denominator - 70% organic ingredients and 30% conventional ingredients plus all types of synthetic processing ingredients

Ruminations

There was a problem with synthetics from day one: the law forbade it, but a constituency insisted on it. That leaves two rational paths: change the law or disappoint the constituency. It is debatable whether the organic industry is going to publicly petition to have an allowance for synthetic ingredients carved into the law. Given the disruption and confusion that this ruling creates, the organic industry may very well have to re-open the OFPA and bring some order by writing more coherent authorizing legislation. The organic industry is loathe to do this because, as scrutiny of any legislation that rolls off Capitol Hill proves, any deal involves compromises. Readers will recall the saga of Fieldale Farms and their complaint of a lack of availability of organic chicken feed. Their congressional representative slipped a rider into an omnibus spending bill giving the company an exemption from this provision. The organic industry demanded that this exemption be rescinded, and it was, in subsequent legislation - that had another rider directing USDA to certify wild caught aquatic animals as organic. The danger in opening the law to 'fix it' is that it opens the door to all interests, not just the 'loyal' organic people. But the bottom line remains: OFPA must be changed to become consistent with the rule or the rules must be changed.

To some observers, the law seems to be twisted and turned to sanction a litany of operations that don't resemble each other in sustainability, regional appropriateness, and association to family-sized farms. The term organic has always been ambiguous - by its very nature it supports diversity, not conformity, of production, and many different pre-existing organic standards were morphed into the current regulation. The organic community is now very vulnerable to charges of hypocrisy. It seems that the door is closing on family farms, while 4,000 to 5,000 cow dairies are certified. The standards have failed miserably if we freeze the number of organic family dairy farms and use one year replacement animals to re-stock mega-dairies for the bulk and private label markets. Anybody who was serious about the standard setting process - and you can read lots about this in the wordy preamble - has to admit that this is a failure. There is no real future for organic dairy if it does not hold open the potential for at least SOME of the existing family dairies to enter production. This is a public relations time bomb with no ready answer if we stray from the commitment to pasture systems that were the foundation of the final rule regarding ruminants.

What's Next

The First Circuit Court has directed the U.S. District Court in Portland, Maine, to issue a declaratory judgment that will bind the USDA to use that interpretation. The USDA now has certain legal avenues to challenge the rulings. If it finds sufficient grounds, it could petition to have the case reheard in the Circuit Court. The USDA will have 45 days from the date of judgment to submit such a petition. If the USDA takes an appeal, this would be to the U.S. Supreme Court. If the USDA decides not to take further legal action, the case will normally return to the U.S. District Court in Portland. The return of the First Circuit's decision to the District Court of Maine will not take place until at least 7 days after the 45-day period. Action by the District Court to carry out the First Circuit's order could be further delayed if either party seeks review before the US Supreme Court.

In a telephone interview, Mr. Harvey said he does not think the USDA will appeal for the reasons that; 1) the appeals court judge was the top in the district and the Supreme court wouldn't bother to review his decisions; and 2) the case was well examined by this appeals court. As to whether he would appeal, Harvey said it would be prohibitively expensive to take it to the Supreme Court, and that he was satisfied with the judgment, with the possible exception of count 5, regarding USDA's failure to certify wholesalers & distributors, which he was considering revisiting, but that generally further appeals would be a waste of time. He did note that USDA could decide to stonewall the entire matter, in which case it could then be subject to further court action.

So, foregoing any appeals from either side, the District will then order the USDA to issue new regulations to replace the provisions that the Circuit Court has found to be unlawful. The USDA would need to draft and propose new regulations, receive public and industry comment and then promulgate final regulations.

The NOP has expressed the position that rule changes take 3 years. Industry observers anticipate these rule changes taking less than 3 years. There could be fast and furious efforts to write amendments to OFPA that would change the effect of this decision and allow some synthetics.

Implementation will be an extended process with the opportunity for public input. It is at this rulemaking stage that parties in the affected parts of the organic industry could submit comments on the need for appropriate phase-in periods. Jim Riddle, chair of the NOSB, said that it is undetermined what role the NOSB will have, but as it is a forum for stakeholders, it is most likely any changes will have input through the NOSB. Says Riddle, "There is now an opportunity for inclusive and thoughtful changes with all stakeholders and those concerned. The problem is that there is a potential for a divisive situation and it doesn't

need to be this way. We must use this opportunity to find solutions that work for organic farmers, processors, certifiers, inspectors and consumers."

The potential fall-out of this ruling could include bad press for organic. Newspapers could put a spin on it, claiming that organic products are full of synthetics or contain ingredients not compliant with OFPA.

In short, nothing will happen to the current Rule immediately. Barbara Robinson, Deputy Administrator of the NOP, issued a memo to the NOSB, OTA and Accredited Certifying agents, saying, "The Department is continuing to review the implications to the Court of Appeals decision. Until such time as you receive further official notification from NOP, you should not take any actions based on this Court decision with your clients." However, some certifiers who were philosophically in support of the ruling may move to implement it, even before the NOP mandates it.

OTA will likely play a crucial role in negotiating with USDA to resolve the issues in the lawsuit. Katherine DiMatteo, Executive Director of OTA, has already met with USDA to discuss the decisions and USDA's response. "The court decision may hamper the growth rate in the short term, but OTA is optimistic that its members and others in the organic community can pull together to maintain the momentum for organic agriculture." Said Demotte. OTA has retained legal counsel for advice on potential legal options.

Conclusions

Like a political candidate whose rise in the polls invites closer public scrutiny, organic producers and handlers are now being challenged to defend actions and positions that were once resolved 'inside the family.'

We are now in the stage where the national standard, which certifies a process rather than products, is being tested in the marketplace.

More thorough investigative reporting (corporate machinations and lawsuits against the federal government are delectable chum for the media) will bring greater attention to contradictions and inconsistencies in the standards that the organic industry by and large learned to live with.

Will the discrepancies between the perception of organic consumers and the reality of organic standards undermine the surging confidence in organic agriculture and disrupt market development?

The Big Picture is that it's healthy to have this honest public discussion about these issues. Hopefully, in the long term, public discussion and the industry's desire for a rigorous certification system for organic will grow the organic industry. Indications are overwhelmingly positive: many people are awakening to the fact that conventional food production, processing, and marketing are creating human health, cultural, and environmental crises.

Organic is now a major point of entry to public awareness and education about their food and where it comes from. The number of consumers that will seek out and pay a premium for healthful food is small but growing very rapidly. Consumer confidence in the USDA organic seal remains very high.

How can we continue to affect positive change? Our problems have answers – we have a process to solve those problems. The organic industry needs to focus on the positive standards process and not put politics into the debate. Individuals, including inspectors, must continue to be heard at NOSB meetings, be willing to submit petitions for rule changes, and engage in dialog within the community.

Harvey's lawsuit was one was to bring about change. Are additional lawsuits in the future? It seems to be an unlikely venue for most changes to occur. Arthur Harvey deserves credit and respect for taking on USDA on this matter. He brought these issues up to OTA and IOIA and, not finding satisfaction, felt that the lawsuit was the only way to bring the matter to full attention and gain some change. His efforts were motivated by an interest in preserving organic integrity. We in the organic community express varying levels of surprise and comfort at his win. In spite of great odds and with minimal support, he won because the Court read the OFPA and the NOP Rule and agreed with Harvey that they were not consistent. His success was based simply on the fact that he was right. It's exceptional and admirable that one person could effect change so big.

Like that political candidate who suddenly has some explaining to do, the organic community should be frank and forthright in explaining where it stands and why.

There is an old advertising slogan that 'an educated consumer is our best customer'. Organic standards that genuinely 'walk the walk' will indeed satisfy consumer expectations and thrive in the marketplace.

This article was based on a number of interviews and press releases with various parties, including OTA, Center for Food Safety, Organic Consumers Assn., Farmers Legal Action group, Inc., Arthur Harvey, Mark Keating, Jim Riddle, and Margaret Scoles.

- 1 7 CFR §§ 205.600(b).
2. 7 USC § 6510(a).
- 3 7 CFR § 205.236(a)(2)(i).
- 4 7 USC § 6509(a)(3).
- 5 7 CFR § 205.606.
- 6 7 USC §§ 6517(a), (d), (e); 6518 (k), (l), (m).
- 7 7 CFR § 205.101(b)(1).
- 8 7 CFR § 205.501(a)(11)(iv).
- 9 CFR § 205.501(b)(2).

See page 11 for more on the Harvey suit.

Board of Directors - Full Board Conference Call Minutes - December 16, 2004

Board and Staff Members Present: Ann Baier, Luis Brenes, Dag Falck, John Foster, Garry Lean, Brian Magaro, Jack Reams, and Margaret Scoles (staff). Brian called the meeting to order at 8:08pm EDT

Agenda Item #1 Approve Agenda

Motion: Jack Second: John

Motion wording: The agenda was approved as written above.

Endorse: All

Agenda Item #2 Secretary's Report

a. Approval of Minutes from Nov.18

Discussion: Review of the minutes from last meeting was done with less pre-meeting review than is typical.

Motion: Dag Second: Garry

Motion wording: The minutes were approved as amended.

Endorse: All

b. Review of Action Points

Discussion: Several Board members acknowledged that there are action points pending. Encouragement was given to do the work we have committed to.

Action Points: All Board members review and complete pending commitments.

Agenda Item #3 Training Issues

a. Training Oversight

Discussion: Training Oversight has been a topic of discussion in the last several meetings of the BOD. The Training Implementation Plan was approved at the November 2004 meeting with the specific methods of oversight to be decided later. Ann presented proposed procedures for oversight of IOIA's Training Program. Other BOD members offered input. The IOIA Board is ultimately responsible for oversight of all activities carried out by the organization. A membership organization, IOIA values the contributions of volunteer committees. We also value input from other stakeholders inasmuch as they further the mission of IOIA. The BOD receives information from different bodies that have distinct roles and responsibilities with respect to the tasks essential to carrying out IOIA Trainings. The Training Oversight Procedures (described in the attached table and diagram – available online at our website) outline the roles and responsibilities for oversight of various individuals and bodies. In summary,

- IOIA BOD is responsible for the business aspects of training. Staff and Training Committee report to BOD, mainly through the Board Liaison for Training.
- IOIA staff are responsible for coordination of trainers in carrying out the training tasks. Staff report directly to the BOD, primarily through the Board Liaison.
- IOIA Training Committee is responsible to oversee and implement feedback on training quality. The Training Committee reports to the Board through goals and annual reports.

This plan was developed with the following objectives:

- Provide appropriate oversight of the IOIA Training Program
- Define Roles and Responsibilities, Reporting and Review Procedures
- Carry out Training work with professional promptness, clarity, and efficiency
- Manage conflicts of interest
- Serve the needs of IOIA clients
- Make appropriate use of IOIA's Human Resources including staff, contractors, and volunteer Board and committee members, according to their interests, expertise and availability.
- Revise the Committee structure to eliminate the two former subcommittees and reinvigorate the Training Committee as a functioning entity.
- Invite all interested members, especially those who had participated on the CAPS and TOC sub-committees members, to become active in the Training Committee. Recommend that the Training Committee develop goals each year that are consistent with IOIA's strategic directions. (For example, invite the Training Committee to offer input into the criteria for Trainer evaluation, including grievance procedures.)
- Develop, as part of the Oversight Plan, written procedures, manuals, job descriptions, guidelines and evaluation criteria for staff, Trainers and Trainings. These components should receive BOD review and approval.

This Training Oversight Plan will be in effect on an interim basis for the next two months until the February 25, 2005 BOD meeting. During that period, we invite input from all interested IOIA members. We are open to all comments and will amend the Oversight Plan (described here and supplemented by the appendices to these minutes. Description, Table, and Diagram) as needed until it is finalized at the February meeting. The BOD noted that several components of this Oversight Plan have already been approved as part of the Training Implementation Plan presented to the BOD by staff at the June meeting and discussed at subsequent meetings.

Motion: Ann Second: Garry

Motion wording: Approve the IOIA Training Oversight Plan, including the division of roles and responsibilities as described above and in the attached appendices.

Endorse: All

Action Points: All BOD carefully review the above Plan and provide input.

b. Curriculum & Professional Development

This item is only on the agenda because we agreed that it would stay on as part of the live agenda. No further discussion is needed at this time.

Discussion:

Lisa has developed the Guidebook for the IOIA Training Program and the Cosponsor Manual and associated documents. These are already being used in their current form. Lisa sent these to the Board in early November. BOD review is urgently needed, as they need to be formatted into their final form around January 1, 2005.

Minutes, continued

Action Points:

- Margaret will forward these documents to the Board again by email.
- All Board members will respond to Lisa about these documents as soon as humanly possible.

Agenda Item #4 AGM Issues

a. Implementation of 2004 First/Second Alternate Bylaw Amendment

Discussion: Brian contacted both the alternates whose terms will be continuing past the next AGM. Both said they would be willing to participate as alternates. Karen Troxell is available to serve. Ann Lameka said she would be spending time in a rural area without reliable access to a phone such that it may be difficult for her to participate in conference calls. For that reason, the BOD will recommend to the membership that Karen will serve as first alternate until the 2006 election. This recommendation for how to fill the positions of first and second alternate positions still needs membership approval.

Action Point: BOD will ask the membership to approve appointment of Karen Troxell and Ann Lameka respectively as the First and Second Alternates.

b. BOD meeting/retreat for 2005

Discussion: Margaret needs input regarding in-person BOD meetings. The BOD of IOIA has historically met in person in the Fall, often at Expo East, and other times in LaVeta and Broadus. This year we did not meet in person apart from the AGM. Budget was a consideration in this decision. Next year we will need to budget for travel expenses for Karen, as first alternate, and for half the travel expenses of newly elected BOD members. The Board discussed plans to meet for two days following the 2005 AGM. Each Board has decided how to meet. An in-person meeting will be particularly important as there will be a change in Board composition as a result of the upcoming election.

c. Nominations Committee

Discussion: The nominations committee is making progress on developing a slate of Board candidates.

Agenda Item #5 Long-range Planning: Continuation of Action Point and Action Plan for 2005

a. Summary Report Update

Discussion: Luis was not able to have a draft prepared before this call, and recommitted to prepare a draft Case by the first of the year for distribution for review by the Board before the next meeting.

Action Points: Luis will send a draft case study to the Board by January 1, 2005.

Agenda Item #6 Training Manager's Report:

a. Update on Additional Training Fee changes

Margaret discussed the fee structure as written in her report. As requested by the BOD at last meeting, the fee schedule for Cosponsor Managed trainings was simplified and now includes a surcharge on Trainer Fees to be used for professional development.

Agenda Item #7 ED Report

Discussion: The Accreditation Committee is not responding to applications in a timely manner.

Mike Wise is not responding to Margaret's attempts to contact him. We should consider reassigning certain responsibilities for accreditation such that the work can be completed.

Judy is emailing and calling every member that has not yet renewed. The response has been positive, with several renewals having paid dues. She will continue to work on this.

Margaret may be switching conference call services according to the best rates available, and will provide the number to the BOD before each call. IOIA will receive grant funds (about \$4000) from an NRCS project via a subcontract with AERO to do organic training and resource development for NRCS. Working with the NRCS on projects in MT last year and this year helped IOIA get a great letter of support for our grant proposal to CSREES.

Agenda Item #8 Adjournment

The Chair adjourned the meeting at 9:02 pm EDT.

Appendix A

Description of Training Oversight

IOIA Training Manager (staff) and International Training Manager (currently a contractor) are responsible for planning, implementation and evaluation of Trainings, including selection of Trainers and signing of contracts with Trainers and Cosponsors, and development of training materials including but not limited to draft manuals and guidebooks and curricula. ITM, Lisa, manages cosponsor-managed trainings and reports primarily to the TM (Margaret) but also directly to the BOD where appropriate. In some cases, similar oversight is needed for both Lisa and Margaret. Margaret manages IOIA-managed trainings and reports to the Board. Reporting consists of: Training Summaries (summaries of each training), Quarterly Training Reports (include summary and analysis, participant statistics, income and expenses, and summary of quality improvement recommendations), and draft Annual Reports to the Liaison for review and the BOD for reference. In addition Quarterly Contract Reports (Contract information and evaluation--confidential) go to the Liaison for review. Both TM and ITM submit relevant draft training materials for to the Training Committee for comment, and to the BOD for approval.

IOIA BOD Liaison for Training is responsible for facilitating relevant communications to the BOD after reviewing reports and communications from the Training Managers and the Training Committee. (Due to confidentiality of information in reports, active Trainers are not eligible for this Liaison position).

IOIA Training Committee is responsible for feedback on training quality. Volunteer members of this Committee develop committee goals, receive draft materials related to training quality from the TM and ITM, and provide input, ideas and recommendations to the TM, ITM and to the BOD.

IOIA BOD is responsible for oversight of the business aspects of training. IOIA Staff and Training Committee report to BOD, mainly through the Board Liaison for Training. The BOD reports to the membership, presenting the Annual Training Report at the AGM. 🚗

GMO NEWS

NOP Policy Statements RE: GMO's

The following is an excerpt from a letter by Bill Hawks, Under Secretary, Marketing & Regulatory Programs, to Gus Douglass, Commissioner, Nat'l Assn of State Dept of Ag., Dec 21, 2004. The full letter and reply are online at:

<http://www.ams.usda.gov/NOP/NOP/PolicyStatements/Letters/NASDALetter.pdf>

"You ask if there is a working definition of the word 'contamination' within the NOP, noting that the word 'contamination' is used frequently in the final regulations, and if all products of genetic modification are considered 'prohibited substances' as defined in the final regulations? And, what actions are authorized or required when organic crops or products are found to contain unintended or inadvertent genetically modified hybrids or other genetically modified substances?"

"Reply: There is no definition in the final regulations of the National Organic Standards for the word 'contamination,' even though, as you point out, it is mentioned frequently. By our count, 'contamination' is mentioned nearly 50 times in the regulations. All genetically-modified practices or products are indeed considered prohibited as cited in 205.105, the paragraph that describes 'excluded methods.' Please refer back to the above issue when considering the adventitious presence of a genetically-modified or genetically-engineered substance. Such adventitious presence does not affect the status of the certified operation and does *not* necessarily result in loss of organic status for the organic product, provided it was produced in adherence with all of the organic requirements under 7 CFR 205. Again, the action regarding the final product's status in this case is left to the determination by the buyer and seller of the product."

Farmers Push for Liability Shield

Farmers in Vermont, Montana, and North Dakota are supporting legislation to make biotechnology companies, not farmers and grain elevators, liable for damages from GM crops. These bills would also prevent the manufacturers from suing farmers whose fields are contaminated by genetically engineered crops and are unintentionally growing these crops.

Legislative committees in Vermont and Montana heard testimony recently supporting Farmer Protection Acts. More hearings are scheduled in both states for further consideration of the legislation. A hearing was also scheduled in North Dakota by the Senate Agriculture Committee on Senate Bill 2235.

Farm advocacy groups across the nation are working with farmers to ensure protection for farmers and by holding companies responsible for any damage caused by their products.

"We've done our homework for Vermont's farmers and our bill is strong and clean. We must make sure that farmers are not bearing the burden for the manufacturers who are marketing a product that is designed to contaminate," stated Amy Shollenberger, policy director of Rural Vermont. "I am encouraged by the strong support for S.18."

In Montana, wheat growers lined up to support Senate Bill 218 during a hearing by the Senate Judiciary Committee.

"If genetically engineered wheat is introduced, this bill will protect farmers from the liabilities associated with this crop resulting from contamination by making sure biotechnology companies are responsible for their product," said Dena Hoff, a farmer near Glendive, Mont., and representative of the Northern Plains Resource Council. Hoff cited a recently released study, *Monsanto vs. Farmers*, by the Center for Food Safety that found that Monsanto has sued or is suing more than 100 farmers for patent infringement. Even farmers who have not planted the seeds are at risk of these lawsuits.

Currently, farmers who buy GMO seeds must sign a Technology Use Agreements. These agreements shield the patent company from liability for contamination and place the full liability burden on farmers. Farmers contend these agreements essentially pit farmer against farmer when conflicts arise.

Farmers are equally concerned about the affects on grain elevators. "Losses to a country elevator for a 400,000 bushel train load of wheat to a west coast port could equal a half-million dollar loss of milling grade, transportation costs, and railroad charges for a train load of wheat sitting idle at the port," said Todd Leake, a wheat farmer from Grand Forks County, N.D., and member of the Dakota Resource Council. "These losses would bankrupt these country elevators."

GE Crops Threaten Organic Farming Industry

Contamination from genetically engineered crops threatens Vermont's growing organic farming industry, advocates said in a January report.

The number of certified organic acres has more than doubled in the past five years, from 15,967 in 1999 to 35,826 in 2004, according to a report released January 27th by the Vermont Public Interest Research Group. The number of organic farmers has more than tripled from 90 in 1994 to 332 in 2004, the report said.

Organic dairy farms also have jumped from 38 to 87 between 1999 and 2004, the report said.

But, according to the report, the growing use of genetically modified organisms threatens to contaminate organically certified crops with their pollen, potentially increasing costs for organic growers.

"Over the past 10 years a remarkable consumer demand for organic food has propelled a very vibrant and rapidly expanding organic sector of Vermont's farm economy," said Ben Davis of VPIRG.

"But there's a problem. And that is for Vermont farmers to cash in on that demand they are going to need to be protected and GMOs undermine that ability for them to cash in," he said.

The amount of GE seeds sold in Vermont rose from 416,698 pounds in 2003 to 506,372 in 2004, the Agriculture Agency reported in January.

GMO contamination of organic corn in Vermont has already been documented, Davis said.

The Senate Agriculture Committee passed a bill (also in January) that would make seed makers liable for damages from genetically engineered seeds or crops.

"I do have great interest in discussing the Farmer Protection Act, the liability bill," said Rep. David Zuckerman, P-Burlington, chairman of the House Agriculture Committee.

"My goal as chair of the committee is to make sure that all these topics get more adequately addressed, or get fair hearings, get open information from all of those involved, from organic producers, seed producers and lawyers to understand really what are these consequences because we're really going into uncharted territory with genetically engineered seeds in our food system."

VPIRG would like the state to go further and ban the use of GMOs to give lawmakers time to fully consider their economic, ecological, and human health impacts, Davis said.

FDA Issues Controversial Guidance on Biotech Foods

The November 24 issue of the Federal Register announced the availability of draft guidance for food biotechnology industries from the Food and Drug Administration (FDA). The guide is titled "Recommendations for the Early Food Safety Evaluation of New Non-Pesticidal Proteins Produced by New Plant Varieties Intended for Food Use." According to the announcement, "FDA believes that any potential risk from the low level presence of such material in the food supply would be limited to the possibility that it would contain or consist of a new protein that might be an allergen or toxin." The nonprofit group Friends of the Earth disagrees, citing the flimsy requirements for safety assessment, the lack of requirements for safety tests in animals, and the illimitable amount of contamination allowed in foods. The group notes that 47 percent of genes in current field trials are trade secrets, thus protecting them from public detection and scrutiny. Full story at:

<http://www.foe.org/new/releases/1104fda.html>

GM Crops Stalled

GeneEthics has refuted claims by the industry-backed International Service for the Acquisition of Agro-biotechnology Applications (ISAAA) that the global area of GM crops increased rapidly from 2003 to 2004. Their latest annual review shows the GM crop industry remains stalled. "GM crops are only 1.4% of global agricultural area and are not taking the world by storm," GeneEthics Network Director, Bob Phelps says. "The ISAAA's own figures show commercial GM crops are not a global industry, as 98% of GM crops are grown in just six countries - USA 59%; Argentina 20%; Canada 6%; Brazil 6%, China 5%, and Paraguay 2%. 93% is in the Americas," he says. "The GM industry's crop product range has also stalled, with only four broad acre commercial crops - soy, corn, canola and cotton," he says. "The ISAAA report offers no evidence that the GM industry can keep its promises of more nutritious foods, longer shelf life products, drought

and salt tolerant crops," he says. "Over ninety percent of all commercial GM crops are monopoly owned and controlled by Monsanto, which is heavily backed by the US government at home and abroad, with subsidies and sweetheart policies," he says. "Despite this, North American farming organizations rejected GM wheat last year and Monsanto cancelled its GM wheat research," he says.

Glyphosate-resistant Ragweed Confirmed in Missouri

Missouri has the first known case of a summer annual weed resistant to the popular glyphosate line of herbicides. The resistant weeds, a biotype of common ragweed, were found in a 20-acre field in central Missouri. Plants from the field, examined by University of Missouri weed scientist Reid Smeda and by officials of Monsanto Company, were found to be resistant to 10 times the rate of glyphosate herbicide that normally controls common ragweed. Glyphosate is the active ingredient in Monsanto Roundup herbicides as well as other brands. Full story:

http://www.newfarm.org/news/2004/1204/121704/glypho_resistant.shtml

Anti-GMO Decree in Italy

The much-contested Alemmano GMO decree was passed by Italy's Lower House with amendments, which would make it more difficult for GM crops to be grown in Italy. With the passage of the Alemmano GMO decree, the Italian Lower House has found a loop-hole in the EU legislation that will allow Italy to implement its own policy on the grounds of co-existence of transgenic, conventional and organic crops. The EU has been slowly opening the doors to GM crops, and has asked its member states to do the same.

However, Italy has several regions that have banned together to block the sale and use of genetically engineered crops.

Early in November, Italy moved to open its doors to GM crops, while granting the authority to regional areas to implement their own bans or open-door policy.

Italy is not the only dissenting EU member state. It is joined by France and Austria, who lead a coalition of EU member states that oppose opening the doors to GM crops. While Holland, Spain and the UK have voiced a more open-door policy to GMOs.

Ermete Realacci, of the Italian Margherita party, is pleased with the modifications to the Alemmano GMO decree and its subsequent approval in the Lower House.

"This time the quality lobby won. The one that cares about the quality of Italy's produce and is not convinced that our country can compete with other countries with GMO corn."

"We hope that the senate will approve the decree swiftly. Our agriculture, the growers and the citizens need precise rules which guarantee freedom of choice which is our only chance to give our produce a place on the world market," says Realacci.

GMO hearings begin in P.E.I.

The public debate over genetically modified organisms has begun in Prince Edward Island (PEI) on February 2. And a record number of people want to have their say before the committee.

The hearings could recommend P.E.I. become a GMO-free zone.

Some farmers see the opportunity to market their products as coming from a GMO-free province as an advantage.

Others are still trying to figure out what banning GMOs would mean.

Eddie Dykerman, who owns Brookfield Gardens, is the new head of P.E.I.'s Federation of Agriculture.

"I wouldn't call it sitting on the fence, but we are being cautious. We think the market is going to drive what is going happen from here on in. If the place doesn't want it, we are not going to produce, as farmers, crops that people do not want to buy."

Premier Pat Binns, who also happens to run his own farm, sparked the debate. He does see an opportunity to carve out a unique place on the store shelves.

There are genetically modified crops being grown on the Island. GM soybean, corn and canola cover thousands of acres.

Those who grow the crops argue they're engineered to resist disease and repel pests. They say the seed costs more, however; they don't spend as much on pesticides.

The debate also includes concerns about large companies owning the patents on GMOs, and consumer suspicions about how GM foods may affect the body. More than 70 groups and individuals from all over North America will make presentations before the legislative committee, setting the stage for a passionate and polarized debate.

Annual Report, from page 4

Increasingly the website is IOIA's 'face' to the public. IOIA mails out fewer hard copy information packets, as inquiries are directed to the website and applications, forms, and info are available for direct download. Diane also moderates The IOIA Forum (inspector list serve). Diane's ongoing work to develop the technical advisory feature for the "Inspectors only" section of the website is waiting for IOIA's new web hosting service, slated for 2005.

Committees

The **Membership Committee**, chaired by Chris Kidwell, worked with the BOD to develop a certifier mailing, which was mailed to all of the USDA accredited certification agencies and IOIA supporting certification agencies. This mailing garnered two new Supporting Certification Agency Members. As well as soliciting certifier input and involvement with IOIA, the mailing encouraged certifier feedback to inspectors and promoted the value of IOIA training for inspectors.

Membership appears to have adjusted to the two changes made in redefining Inspector membership status in 2003. The Inspector member category increased modestly this year and reflects a slow but steady flow of new Supporting Individuals into the Inspector category after they have appropriate inspection experience. A positive result observed is more stability in the voting member base of IOIA. Members who were dropping membership were encouraged to contact IOIA to let us know why they were dropping. This informal poll indicates that most are simply not doing inspections any longer. **A big thank-you to Chris for his work as Nominations Committee Chair.** The Membership Committee Chair doubles as Chair of the Nominations Committee.

The **Scholarship Committee** this year reviewed 8 applicants for our inspector scholarship and 2 applications for the Organic Community Initiative Scholarship. Congratulations to this year's Andrew Rutherford Scholarship winner, Cheryl Laxton of British Columbia, and OCIS Scholarship winner, Bel Bahadur Gurung, of Nepal. The 2003 winner, Sandeep Bhargava of India, attended training in Hong Kong and was the first OCIS winner to actually be able to use

their scholarship. Wendy Ziehl attended the Arkansas Farm training on her scholarship during 2004. IOIA extends a special thank you to new Chair, Nancy Ludwig and to outgoing Rochelle Eisen for her many years of Chair service.

The **Ethics Committee**, chaired by Joyce Ford, had another quiet year with no formal inspector complaints. The Committee was requested by the BOD to review the complaint fee, in response to a request by an IOIA member, but they recommended no changes.

The **Accreditation Committee**, with Chair Jake Lewin, oversees the IOIA inspector accreditation program. The Accreditation Review Panel reviewed 9 applications for crops, livestock and/or processing accreditation. Twenty-seven IOIA members are accredited, which reflects the first increase in 3 years. Stephen Grealy is the new ARP Chair.

The **Latin American Committee** supported Latin America's hosting of the 2004 AGM in Costa Rica. IOIA increased the budget for this committee to award 4 scholarships to IOIA Latin American members to assist them in attending the Advanced Training and AGM. Lidia Gaivronsky's resignation as Chair of this Committee was accepted regretfully but with much appreciation. The position has not been filled.

The **Canadian Committee**, chaired by Janine Gibson, participated in development of the Canadian Standards, staffed the Guelph Organic Conference booth, and will assist in hosting the 2005 AGM.

The **Bylaws Committee**, Chaired by Arthur Harvey, proposed two Bylaws Amendments in 2004. Both were adopted by the members. Following animated discussion at the AGM regarding Bylaws changes, the BOD decided to encourage, whenever possible, to delay votes on Bylaws Amendments until discussion at the AGM could be better digested and some written material provided to members with the ballot. One Bylaws Amendment changed the structure of the Board of Directors, reducing the number of Alternates to two. These are designated First and Second Alternate, with the First Alternate participating in all BOD meetings so that they can engage in informed voting whenever a vacancy exists on the BOD. If the Board has a vacancy, the First Alternate will be appointed to fill the vacancy.

The **Communications and Marketing Committee**, under Chair Bob Howe, submitted a promotional article for the Expo East news magazine. This was likely one factor in establishing a new contact at Expo East and a relationship with a consultant who wants to collaborate with IOIA to take inspector training to the Islamic world.

This list of committee activities is far from comprehensive. IOIA appreciates all volunteers. Committee Reports will be available at the AGM. Poster sized committee reports were displayed for the past 2 years at the AGM (special thanks to Diane).

IOIA Board

There were no changes on the BOD of Directors during the 2004 election. This remains the most international Board IOIA has ever had; a minority of the current Board are from the US. Three board members are up for re-election this year and have expressed their desire to continue to serve IOIA. These include Ann Baier, current Secretary; Luis Brenes; and John Foster. Dag Falck opted not to run for re-election. Dag's ability to think like a computer with a heart will be sorely missed on the Board.

In 2004 the Board held only one full board business meeting in person, in Costa Rica. Budget concerns and the higher cost of meeting in Costa Rica for the AGM was part of the decision to meet only once in person. The BOD opted instead to increase frequency of conference calls.

IOIA was proud to host our first completely bilingual Annual Meeting in 2004. ♣

Jamaica to Invest \$20 Million in Organic Farming Industry

The Jamaica Observer reports that the Jamaica Organic Agriculture Movement has backed a government plan to invest \$20 million over the next three years to develop the nation's organic farming industry. With the hope of entering rapidly growing international organic market, the government will develop a national policy on organic agriculture and offer technical support to farmers. <http://www.jamaicaobserver.com/news>

Intoxication: Euphoria at getting a tax refund, which lasts until you realize it was your money to start with.

Resources

Free Certified Organic Seed Sourcing Service Save Our Seed has announced that it will offer a free Certified Organic Seed Sourcing Service in 2005 to support certified organic growers in finding the seeds they need, as well as being clear when the seeds they are looking for are not available. URL: <http://www.savingourseed.org/pages/sourcing.htm>

The **2005 Farming Sourcebook with a Focus on Sustainable and Certified Production** is available at no cost courtesy of Oregon State University. You may download the 32 page PDF file at: http://oregonipm.ippc.orst.edu/2005_farming_sourcebook_final.pdf

World Agriculture and the Environment: A Commodity-by-Commodity Guide to Impacts and Practices. Jason Clay. Island Press, Washington, DC, 2004. 568 pp., illus. \$35.00 (ISBN 1559633700 paper).

Rust, Resistance, Rundown soils and Rising Costs - Problems facing Soybean producers in Argentina. Charles M Benbrook, Date published: 20, January 2005. Format: Adobe PDF

Download the full report: http://www.greenpeace.org/international_en/reports/ex-summary?item_id=715074&language_id=en

For other Benbrook technical papers on GM crop issues, go to http://www.biotech-info.net/highlights.html#technical_papers

Have you seen **The Non-GMO Report?** See the January issue on the IOIA website, www.ioia.com in the Books & Goods section. The Non-GMO Report is a monthly newsletter that provides useful information and resources to help food producers:

- * Produce IP, non-GMO products from "seed to shelf"
- * Prevent GMO contamination
- * Find non-GMO ingredient sources
- * Connect with potential buyers
- * Stay up-to-date on GM food issues and trends in food traceability.

In addition, we have published The 2005 Non-GMO Sourcebook, bigger and better than last year's directory of non-GMO and organic suppliers and service providers. You will receive the Sourcebook free as a bonus for subscribing to The Non-GMO Source newsletter.

Special reduced annual subscription of \$35US by post OR \$25US email version through IOIA Please reply to lindy1@lisco.com



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- Sustainer - \$1000

The Inspectors' Report – 1 year subscription (4 issues) \$30

2005 IOIA Membership Directory - \$25

IFOAM/IOIA International Organic Inspection Manual:

- \$45 members
- \$60 non-members

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IOIA HAS SEVERAL PUBLICATIONS FOR SALE. ORDER HERE OR THROUGH OUR WEBSITE.

- Building Soils for Better Crops (2nd Edition), by Fred Magdoff and Harold Van Es. 240 pp. \$20
- COG Organic Field Crop Handbook, 2nd Edition, Expanded and Rewritten. Published by Canadian Organic Growers. An invaluable resource. While preserving the best of the now out-of-print and no longer available first edition, this edition is updated to include info on GMO's, E. coli issues in manure, and many additions to the crop section. 222 pages, spiral bound, \$30.00.
- Food Plant Sanitation and Safety, by Dr. Joe Montecalvo, 184 pp, \$50.00
- Introductory Food Science, Dr. Joe Montecalvo, 187 pp, \$50.00
- Managing Cover Crops Profitably, 2nd Edition, published by Sust. Ag Network, \$18.00
- Organic Livestock Handbook, published by Canadian Organic Growers. Edited by Anne Macey, 179 pp, spiral bound, \$25.00
- Organic Tree Fruit Management, published by COABC, 240 pages, \$30.00
- Steel in the Field, published by Sustainable Ag Network, 128 pages, \$16.00
- Introduction to Certified Organic Farming. Published by REAP CANADA, 200 pg. \$25.00

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2005 Calendar

February 18-20, IOIA/JOIA Basic Organic Inspector Farm training, Tokyo, Japan. See page 3 for details.

February 20-22, National Campaign Annual Conference, Washington, DC. Info: www.sustainableagriculture.net

February 24- 26, 16th Annual Upper Midwest Organic Farming Conference, La Crosse Center in Downtown La Crosse, WI. Info at: 715-772-3153; fax 715-772-3162; info@mosesorganic.org

February 24-27, BioFach, Nuremberg, Germany. Info: info@nuernbergmesse.de
www.biofach.de

February 28 – March 3, NOSB meeting, Washington Terrace Hotel, Washington, DC. info (202) 720-3252. or www.ams.usda.gov/nop

March 5, CT NOFA End of Winter Conference, Windsor, CT.
<http://www.ctnofa.org/conference/index.php>

March 5 – 6, 2005 Annual OEFFA Conference, Johnstown, OH. Info: www.oeffa.com

March 13-15, IOIA/JOIA Basic Organic Processing Inspector training, Tokyo, Japan. See page 3 for details.

March 17 – 18, Organic Inspector Training, Vancouver, British Columbia. IOIA will sponsor Advanced Organic Inspector Training at the Granville Island Hotel on March 17-18 immediately before the next IOIA Annual Meeting on March 19. IOIA and Fraser Valley Organic Producers Association will also cosponsor Organic Livestock Inspector Training in Vancouver in conjunction with these events. See page 3 for details or go to www.ioia.net

March 19, IOIA Annual General Membership Meeting, Granville Island, British Columbia. Info: www.ioia.net

April 6 – 9, IOIA Organic Farm Training, Las Cruces, New Mexico. See page 3 for details.

April 10 - 13, IOIA Process Inspector Training, Las Cruces, New Mexico. See page 3 for details.

April 17 - 18, 8th Annual Organic Products Europe and Natural Products Europe. Grand Hall Olympia, London, England.
http://www.naturalproducts.co.uk/op_europe/index.shtml

April 29 – 30, Organic Beekeeping Workshop, Chestnut Ridge, NY
For active beekeepers as well as beginners

and it includes a hands-on session. Info: www.pfeiffercenter.org

May 1 – 3, All Things Organic – OTA Trade Show. McCormick Place, Chicago, IL. Info: www.organicexpo.com, organicexpo@divcom.com, or call 207-842-5504

May 7 – 10, Int'l Organic and Agroecology Products Fair, São Paulo Brazil. Contact Maria Cristina Botelho, (55 11) 4689 3166, cristina@francel.com.br

May 21 - 22 6th Annual Heartland Festival, Double T Acres, Stevinson, CA
Info: www.eco-farm.org (831) 763-2111
info@eco-farm.org

July 12 – 24, VI International Short-course on Agroecology 2005 Santa Cruz, California. <http://www.agroecology.org/shortcourse.htm>

July 29 – Aug 20, Organic Agriculture Development Advanced International Training Programme, Sweden. Participants for shall come from developing countries in Asia. Info at www.grolink.se

September 19-23, 15th IFOAM World Congress, Adelaide, Australia. Info: Fax: +61 8 8339 7800, <http://www.nasaa.com.au/ifoam/>
E-mail: ifoam2005@nasaa.com.au

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