



# QCS NEWS

## News from Quality Certification Services

Friends of Organic,

In late April we were taken aback by sudden issuance of “directives” by the National Organic Program (NOP). We did not feel at the time that it was in the best interest to solicit a reaction from QCS certified entities. Many of you may have signed petitions or called the NOP offices. While these actions did seem to provide the catalyst for the repeal of the directives, we avoided an organization of such a response because it was precisely the kind of action that led the NOP to disregard the opinions of the organic community in the first place.

QCS has a good working relationship with the NOP. Through meetings and conference calls, I have gained insight into the agency’s strengths and weaknesses. In the case of the directives, the NOP did not fail to follow what they maintain is the letter of the law. They requested the lawyers at the Office of General Council read the current organic standards and the program clarified how they could be interpreted. The resulting interpretations were never put out for comment by the public (consumers), industry (Organic Trade Association), or other stakeholders, including the USDA National Organic Standards Board (NOSB). The NOSB is an advisory board which has spent countless hours taking public input and developing recommendations for the implementation of the National Organic Program.

I work on policy issues related to organic agriculture with many colleagues. Among the duties I have and where I find support are as a board member of the Organic Trade Association (OTA), Steering member of the National Campaign for Sustainable Agriculture’s Organic committee, board member of the Southern Sustainable Agriculture Working Group and of course my close relationship with Florida organic producers, processors and consumers.

The biggest problem, in my eyes, was the lack of process. There was never a chance for those who know, or those who care, to have input. Did the lawyers know anything about organic farming? Did they care about consumer confidence in the organic label? Clearly not as much as the organic industry, consumer organizations, and members of the organic community who raised their voices to oppose the directives. This public outcry opened the eyes of the NOP: they violated the spirit of the law.

It was a step in the right direction for the NOP to question which sections of the organic standards were unclear. It was a big step in the wrong direction to not bring the sections under question to the table with at the very least the USDA’s own National Organic Standards Board (NOSB).

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Why the bad manners? The relationship has long been in need of repair. The USDA is “quick to have rocks thrown at it” and they come from different directions. They get defensive and seem to have turned off the willingness to communicate at times. Many organic farmers and consumers are historically not the biggest fans of the federal government. USDA is not accustomed to “seed to table” programs with such a hyperparticipatory community/industry. One has to remember that the vast majority (if this isn’t an understatement) of USDA resources, attention, and powerful backing go to biotechnology, chemical intensive and confinement production and the continuance of “cheap food” even if it is damaging to the soil, ground and surface water, farm workers, and possibly contributes to health problems. This all the while being dependent on cheap oil and a military expenditures which insure it, while devastating rural communities, farmers in other countries, and farmers here at home. And then there is the emotion. Organic farmers and many organic consumers are passionate about why they do what they do, or purchase what they purchase and the idea that organic will go the way of “natural” labeling or be hijacked is a valid concern, given past experience.

(continued on next page)

## Florida Certified Organic Growers & Consumers, Inc. (FOG)

Our mission is to promote organic and sustainable agriculture on local, national and international levels through the education of growers, consumers, policy-makers and the media.

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Quality  
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We offer ISO Guide 65 and USDA National Organic Program accredited certification.

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### Neighborhood Nutrition Network



We are a network of community members, agriculture educators, farmers, health professionals, teachers, and business owners. Our mission is to help build healthy local food systems so that everyone may access fresh, nutritious food. Our activities focus on food access, creating community and school gardens, nutrition education, youth-based programs, enhancing local agriculture and food system advocacy.

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The original guidance, then directives documents, may be able to be found on the USDA site, but since the USDA Secretary of Agriculture issued instructions to rescind the documents and work with the industry and NOSB, they seem to have disappeared in substance, though not in the NOP mind or heart. The NOP issued a response "Misinformation Regarding NOP Statements" on their website, but the next day it was gone. Our hope is USDA is now ready to work with all the stakeholders prior to issuing "directives" that could decimate the industry by causing a loss of consumer confidence.

It is a difficult task to document the timeless practices of organic production in a constantly changing world. It takes time to differentiate medicines from poisons. We understand that it is hard to make program requirements instill consumer confidence all over the country, while having a regulation be applicable from Florida to Alaska, Hawaii, to Maine and all over the world where products are destined for the US marketplace. If the regulation needs to be changed to stay inline with the wishes of those producing and purchasing organic products, the USDA needs to supply staff willing to work with the NOSB, industry, and consumers. Our certification department, Quality Certification Services, (QCS) has been working with shrimp producers for a number of years. We have certified shrimp which meets the NOP livestock regulation. Consumers have expressed interest in buying certified organic shrimp and the marketplace would encourage increased production if consumers remain confident of the USDA Organic label. The NOP is aware of this, and has asked us to send them our guidance statement on setting organic aquaculture standards. We look forward to working with the NOP to improve organic standards.

We are glad to represent such a strong organic community and industry. We've made decisions in the past year to improve our communication with you. We are happy to represent you in meetings where you can't attend on issues related to your operation. The take home message: You need to get involved, stay involved, and weigh in, when things you care about are decided for you in Washington DC.

Sincerely,  
Marty Mesh  
FOG, Executive Director

### Attention QCS Customers -

In the past year, many of our recertifying and new customers have requested an expedited certification process due to various circumstances. In an attempt to meet the demands of our customers, QCS attempted to expedite as many files as were requested. However, the expedite requests quickly became the norm instead of the exception. As a result customers who submitted their applications in a timely manner were put on hold so that we could deal with the many expedite requests. **At this time, QCS can no longer expedite files out of fairness to all of our customers.** We are working on new internal processes to help decrease the amount of time needed to complete a file review and issue a certification decision. As always, your role as an applicant is essential in determining how much time is needed to review your application. It takes QCS approximately 90 days to complete the certification process, given the timely response to requests by applicants. By submitting your applications and requested information in a timely fashion, you help QCS meet your needs and the needs of all our customers. We've included more suggestions for efficient certification processing in this issue of QCS News.

Thank you,  
Angela Caudle  
QCS Director

# On the Record

Most minor non-compliances that occur during the organic certification process are caused by inadequate record keeping systems. The National Organic Program (NOP) specifies that certified operations must maintain records concerning the production, harvesting, and handling of agricultural products that are intended to be sold, labeled, or represented as organic. These records should fully disclose all activities and transactions in sufficient detail as to be understood without any confusion. All records must be available for verification at the time of an organic inspection. Inability to provide adequate records can prolong the certification process or result in minor noncompliances. Developing and maintaining a good record keeping/audit trail system can be a daunting task. It is helpful to understand what records should be kept and why.

## Importance

The different components of a record keeping system guarantee that every practice, purchase and/or sale that is part of the organic operation is compliant with the regulations of the NOP. Adequate record keeping systems may also protect the producer from liability. Records help the producer manage the operation more efficiently. By providing useful information about market trends, climate, pests and diseases, cultural practices, soil conditions and/or allowed products and ingredients, the producer can save time and make better decisions regarding numerous aspects of the operation.

## Required information

Although developing a system that best fits the structure and needs of the operation is the responsibility of each particular producer, most operations will have to provide these basic records and supporting documents:

- 1) Field history
- 2) Field maps
- 3) Field activities
- 4) Records for purchased inputs
- 5) Sales records
- 6) Lot numbering system
- 7) Correspondence with certifying agents
- 8) Organic certificates

Please note that these are just some examples of records that are required. The more documented information producers can provide about their organic operations - the better.

## Field History

Include all corresponding fields, acreage, crops grown and inputs that were used to grow the crop. The field history form included in the certification packet determines whether the information in the rest of the application - farm records and the organic certificates - is accurate.

## Field Activities

Log all activities related to the operation, with dates and descriptions. Some producers keep this information in a field notebook. This information should be complete and accessible.

## Purchased Inputs

Document all products purchased for activities related to the operation. It may be useful to have the supplier's contact information.

## Sales Records

Maintain records of all transactions that pertain to the sale of organic products. In cases where both organic and nonorganic products are sold, distinguish which of those products are organic.

## Lot Numbering System

Track each individual producer's incoming products by assigning lot numbers to identify each delivery. This identifies products clearly, avoiding confusion over the use and/or sale of unintended products or ingredients. Lot numbering system should remain consistent and current.

## Correspondence with Certifying Agent

Record all correspondence between the producer and the certifying agent regarding requests for additional information, or verification that a particular practice and/or product is permitted. Requests should be clear, concise and explicit as to their purpose. Save any written response from the certifying agent regarding the request(s).

## Organic Certificates

Maintain copies of organic certificates for any organic products and/or ingredients that are to be used in the final product. These copies must be maintained regardless of where and/or who certified the particular ingredient.

Records should be easily accessible to certifying agents and/or organic inspectors. This is particularly important for operations with multiple sites where organic products are produced. Although sites may share one single organic system plan, records for individual activities and/or practices that pertain to the site need to be maintained on location. Any deviation from the original organic production plan should be submitted to the certifying agent prior to implementation.

The only way organic certification can continue to meet the demands of organic producers and consumers is through authentication, which can only be accomplished by a complete audit trail. A good record keeping system can assure compliance and prevent fraud. Once a product has met requirements, it can be safely certified. Certified products are easier to market, providing easier consumer recognition.

## Processor News

### Requirements for Sourcing Organic Ingredients

Since the induction of the National Organic Program (NOP) - it has been required that all organic ingredients are certified by an USDA-accredited certifying agent. Agents may offer multiple organic certification programs (for example IFOAM, EU ECC 2092/91, JAS), therefore it is essential to know that the product you are sourcing has been certified to the USDA NOP. When you source organic ingredients, you must provide documentation that the organic ingredients are produced and handled in accordance with the USDA NOP standards and are certified organic by a USDA accredited organic certifying agency. This will be stated on the organic certificate and/or the export certificate. Failure to provide this information upfront will cause delays and complications in the certification process.

A listing of USDA accredited organic certifying agencies can be found on the NOP web site. Visit [www.ams.usda.gov/NOP](http://www.ams.usda.gov/NOP), and select "Certifying Agents".

### Organic Facility Pest Management Standards (7 CFR 205.271)

The standards for organic facility pest management outline a sequence of conditional practices that increase in severity as preferred efforts fail. Progression in the sequence towards the chemical control of pests requires approval from a certifying agent and a more extensive framework of documentation.

The first line of defense includes the use of good management practices. For example, removal of pest habitat, food sources and breeding areas. This also includes prevention of access to the facility, and the management of certain environmental factors.

If these efforts fail, pests may be controlled through mechanical or physical controls. These include lures and repellents containing substances listed on the National List (i.e., 7 CFR 205.605).

If these methods fail, then a substance consistent with the National List may be applied. If such a substance is found unsuccessful, then a synthetic substance that is not on the National List may be applied, *provided that the handler and certifying agent agree on the substance, method of application, and measures to be taken to prevent contact of the organically produced products or ingredient with the substances used.*

Any handler applying either a nonsynthetic or synthetic substance to prevent or control pests is required to update their organic

handling plan. The handler must document the sequence of measures taken to manage pests. This includes identifying the substances and methods used for chemical applications, and all measures taken to prevent contact of organically produced products, ingredients, packaging materials, and storage containers with the substance.

## QCS Helping NOP Develop Organic Aquaculture Guidance

The recent (retracted) NOP Scope Directive brought into question the eligibility of aquaculture for organic certification by the USDA. Aquaculture does indeed fall under the regulatory authority of the NOP, but a current lack of species specific standards presents a challenging certification process.

Prior to the issuance of the NOP Scope Directive, QCS had worked with several shrimp producers to verify compliance with general NOP livestock standards. We certified one operation as organic under the NOP Rule. We also know several producers who have made significant investments in their move toward organic production. They are currently selling their products under market labels such as "produced without the use of hormones, antibiotics, GMOs and [specific chemicals]." There is a favorable demand for these products.

Without the support of the NOP, aquaculture certification could become meaningless in the marketplace. The organic aquaculture producers who invested substantial amounts of money to become compliant could lose their product differentiation advantage. That wouldn't be fair. It's important that guidance for organic aquaculture under the NOP be developed in a timely manner, so as not to cause consumer confusion.

Due to the work we have done in organic aquaculture, the NOP has requested that QCS submit guidance information for certifying aquaculture products under the current NOP Rule. In this effort we are seeking comment from the industry, environmental, consumer and scientific communities in order to strengthen the standards as needed. We hope to provide the NOP with straightforward guidance that will ease more organic aquaculture products into the marketplace with the same organic integrity as all other agricultural products currently certified under the NOP. The next year should be an exciting one.

### Meet our newest certified entities:

- Coffee Bean Corral in Kapaa, HI
- The Grove in Thonotosassa, FL
- Back to Nature Foods Company in ID and WI.
- Rising Sun Jersey Farm in Grove, WI
- Swamp Fox Mill in Cerro Gordo, NC
- Terra Bonne in Cottondale, AL
- George Jacoby in Winter Haven, FL
- EcoVillage of Loudoun County in Lovettsville, VA
- Galloway Greens in Ft. Walton Beach, FL.
- Grove Squeezed LLC in Florida.
- Partners Coffee Company in Atlanta, GA
- Ayrshire Farm in Upperville, VA
- Pastime Farms LLC in Roseland, LA
- EXPALSA S.A. in Guayas, Ecuador
- Spooner's Organics Inc in Vero Beach, FL
- H & H Farms in Castalia, NC
- Pavel's Yogurt Co. in Oakland, CA
- KMC Citrus Enterprises Inc. in Weirsdale, FL
- Butterfly Cattle Company in San Antonio, TX
- Kirkland Harvesting Inc. in St. Lucie County, FL
- Five Penny Farm in Floyd, VA
- Allison Farms in Palatka, FL
- Stonecrop Farm in Newport, VA
- Spring Song Organics in Alachua, FL
- Sunshine Farms in Zephyrhills, FL
- Briscoe Farms in Darby, FL
- Larry's Beans Inc. in Raleigh, NC
- Dharma Farm in Signal Mountain, TN
- Robert L. Knight in Vero Beach, FL
- Miami Citrus Inc. in Fellsmere, FL
- Cason Farm in Lake Butler, FL
- Kerry Speciality Ingredients in Owen, WI
- Abaco Neem in the Bahamas

# The Role of Plant Nutrients

Crops and other plants take up nutrients from the soil as they grow. The major nutrients are nitrogen (N); phosphate (P<sub>2</sub>O<sub>5</sub>), the oxide form of phosphorus (P); and potash (K<sub>2</sub>O), the oxide form of potassium (K). Crops also require other nutrients for growth and development, including magnesium, calcium, and sulphur, but in smaller amounts. Sulphur, for example, is important to plants for protein formation. Nutrients that crops need in only small or trace amounts (called micronutrients) include boron, chlorine, copper, iron, manganese, molybdenum, cobalt, sodium, and zinc. Commercial fertilizers are applied by farmers to ensure sufficient nutrients for high crop yields. Lime is also applied to some soils as a soil amendment, rather than as a nutrient. Lime reduces soil acidity (pH) so that crops can better utilize available nutrients and micronutrients.

From the settlement of the United States until the 19th century, increased food production came almost entirely from expanding the cropland base and mining the nutrients in the soil. However, the expanding demand for agricultural commodities required soil nutrient replacement to maintain or expand crop yields. First, manure and other farm refuse were applied to the soils. Later, applications of manure were supplemented with fish, seaweed, peatmoss, leaves, straw, leached ashes, bonemeal, and Peruvian guano, materials that contained a higher percentage of nitrogen, phosphate, and potash than did manure.

## Why Manage Nutrients?

Profitable crop production requires significant amounts of nutrients in the form of commercial fertilizers and animal wastes, portions of which can subsequently run off into surface waters or leach into groundwater. The two primary agricultural nutrients affecting water quality are nitrogen and phosphorus. Nitrogen, primarily found in the soil as nitrate, is soluble and easily transported by surface runoff, in tile drainage, or by leachate. Phosphorus, primarily in the form of phosphate, is not as soluble as nitrate and is primarily transported by sediment in runoff. However, phosphorus can also be transported in soluble form, particularly phosphorus contained in animal wastes. Excessive nitrogen or phosphorus in surface waters can cause algae to grow at an accelerated rate and cloud water, which prevents aquatic plants from receiving sunlight for photosynthesis. When the algae die and are decomposed by bacteria, they deplete the oxygen dissolved in the water and threaten aquatic animal life. This process, eutrophication, can result in clogged pipelines, fish kills, and reduced recreational opportunities or enjoyment. According to the U.S. Environmental Protection Agency (EPA), nutrient pollution is the leading cause of water quality impairment in lakes and estuaries and the third leading cause in rivers (1995). Nitrate is also a concern for drinking water, when present above a certain concentration. Based on the human health effects, EPA has established a maximum contaminant level of 10 mg/liter for nitrate in public drinking systems.

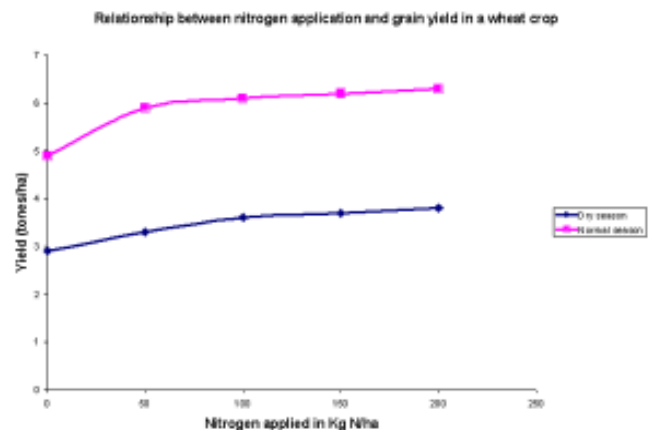
Nutrient pollution of water resources can occur because of unusually wet weather that increases nutrient leaching and runoff. It can also occur when farmers are unaware of the offsite effects of their production decisions, or when they have no assigned cost or penalty for those effects and so choose production systems that may have greater profitability or less economic risk but higher nutrient losses.

Before we start working a nutrient budget some assessment questions that will help us to understand the soil-plant relationship

1. What are the excess effects of Nitrogen on crops and in the environment?
2. Give an example of raw organic matter.
3. Explain the difference between compost and other organic matter.
4. Which nutrients affect pest and disease susceptibility?
5. In general what is the minimum fertility program for sustainable agriculture?
6. Explain the concepts of Cation Exchange Capacity and Cation Saturation Ratios.
7. What are the three primary sources of nitrogen factored into a nitrogen budget for an organic farming system?

## Understanding Nutrient Supply and Crop Response

Nutrient demand for crops is experimentally inferred from yield responses to nutrient application. Not all nutrients that are applied are available for uptake by the plants. Some are subject to chemical and biological transformations and physical processes in the soil. Once absorbed, their distribution and their functioning within the plant vary, as they depend on environmental conditions and their interactions.



The explanation for the graph and the answer to the assessment questions will be discussed in the next QCS news letter.

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## Farm Spotlight: West Wind Farms

Eight years ago, Kimberlie and Ralph Cole decided it was time to transition away from the corporate environment and explore an alternative lifestyle. They found a track of land on the Cumberland Plateau and sought the best approach to a diversified farming operation. The shallow sandy soils suggested that cultivating a permanent pasture would best suit the land. Prior to their purchase, the area now known as West Wind Farms had been row-cropped by conventional farmers. The Coles began the long road to restoration. They wanted their cows, hogs, sheep, chicken, turkeys and goats to have the very best. They wanted their farm to be organic. The assortment of animals all chipped in, offering diverse soil fertilization and grazing at different levels. Five years later, West Wind Farms began the certification process and in October of 2001 received the QCS stamp of approval.



**West Wind Farms raises organic grass-fed livestock in Deer Lodge, TN**

West Wind direct markets their products in Tennessee through farmers markets in Oak Ridge, Knoxville, Franklin and Chattanooga. They also mail-order across the country. Customers find them through their website: [www.grassorganic.com](http://www.grassorganic.com). Visit the site for an example of extremely successful online product marketing. Demand is so high for their products - the Coles are working to develop an alliance with regional livestock producers to increase supply. In addition to meat and poultry, they sell handmade cheeses, pet treats, and honey. They started a raised-bed vegetable garden this year, allowing them to diversify their market stands with fresh produce.