



QCS NEWS

News from Quality Certification Services

Big Time!

We are very proud to announce that as of September 1st, Angela Caudle will no longer be working for us as the QCS Program Director. Angela is relocating to Bonn, Germany and will be the new Executive Director for International Federation of Organic Agriculture Movements (IFOAM). While she will be greatly missed around our office, we look forward to seeing how the talents and strengths she developed during her years with us will serve her as she takes on a very important role in the world of organic agriculture.



Angela Caudle is leaving QCS to become the Executive Director of IFOAM

Angela came to work for us in 1999, when we were a fairly small organization. She helped to develop the certification program and our model community food program. Angela assumed the QCS Program Director position in 2002. She saw the program through substantial changes and rapid growth while the organic industry was coming under the regulatory environment of USDA. Under her leadership, the changes for our certification program were greater than at any time in its 16 year history. As our organization works with IFOAM, clearly that our paths will continue to intersect. I look forward to watching Angela work on issues related to the global embracement of organic agriculture.

So what does this mean for QCS? Jonathan Austin, the QCS Director of Operations, who recently graduated from the University of Florida Law School, has accepted the position of Managing Director for our organization and will be responsible for day to day operations. We have begun and will continue to critically evaluate the certification program and make improvements. We recently hired additional administrative help to aid in a more timely completion of certification. Please be on the lookout for a short survey – we hope to gather information from you, our stakeholders. I believe you will see some positive changes which will result in a targeted timetable for each major step in the certification process, overall a much shorter time period for the certification process to be completed, a renewed commitment to providing unparalleled customer service to you, and continued efforts to make sure your positive thoughts and concerns about the National Organic Program are heard and communicated. I must issue a warning, though. In the past, we've been lenient with deadlines, but now there is pressure on our organization to issue a non-compliance for failure to submit timely applications. We are making every effort to stay in close communication with you throughout your application process, but we need you to take responsibility for your deadlines. Please do your part so we can better do ours. Should you have any concerns or questions please feel free to contact me or the program staff.

Assessments for Period I, 2005

Please be aware that the deadline for sending in assessment fees and forms for Period I of 2005, was August 15, 2005. If you did not send these in, please do so immediately and include a \$25 late fee in addition to the assessments. Period I covers the period January 1, 2005 through June 30, 2005. Assessments can be paid online with a credit card at our website: www.qcsinfo.org. Download the instructions first.

Here's wishing you and your operation a pleasant Fall, and wishing Angela happiness as she begins a new chapter in her life.

Sincerely,

Marty Mesh
Executive Director

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.

FOG Board of Directors

President: Frank Oakes

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Secretary: Pam Smith

Directors: Sue Morris, Victoria Freeman

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Managing Director: Jonathan Austin

Office Administrator: Sharon Larsen

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Editor/Membership Coordinator:

Jennifer Ambrose Cotter

IT Manager: Scott Byars

To reach a FOG staff member, send an email to fog@foginfo.org, or call (352)377-6345

Quality Certification Services (QCS)

QCS, a program of FOG, offers ISO Guide 65 and USDA National Organic Program accredited certification.

Program Director: Angela Caudle

Operations Director: Jonathan Austin

Administrative Assistants:

Vanessa Carbia, Nyssa Lunetta

Certification Coordinators: Laura Kennedy,

Juan Carlos Rodriguez, B. Ramkrishnan

To reach a QCS staff member, send an email to qcs@qcsinfo.org, or call (352)377-0133



Serving the Organic Industry Since 1989

The Importance of the Organic System Plan (OSP) and Record Keeping

Most growers who are familiar with the organic certification process know that they are required to submit an updated organic system plan (OSP) every year, no later than the anniversary date of their first issuance of organic certification. Although most of the growers we certify submit their annual OSP on time, many fail to adequately complete all the information that is required to verify compliance.

We often hear your comments regarding how difficult it is to maintain, complete, or submit all the required paper work on time. We realize that your primary concern is with tending your crops, livestock and/or organic products and not filling out paperwork. However, organic certification requires that you verify the ways that you are managing your organic system to produce products according to the National Organic Standards. Certifiers cannot issue organic certification unless they can verify through the proper documentation (paperwork) that organic producers comply with these requirements.

You can efficiently maintain a good record keeping system, submit a complete OSP, and comply with the submission of any additional required information. It may help you to follow some of the suggestions below:

- 1. Review the sections of the NOP that are relevant to your operation:** The more familiar you are with the regulations that apply to your operation, the easier it will be to comply with them.
- 2. Review your Organic Systems Plan (OSP) prior to its annual submission:** Verify that your OSP is current and complete, with all pertinent attachments. Keep copies of previous OSPs in your files. You should always have a complete, current OSP on file.
An incomplete OSP may be returned and will cause delay in your certification. Make sure you answer all the questions that apply to your operation in your OSP/farm plan application.
- 3. Develop generic record templates:** There are many different templates that you can use. You can visit websites such as <http://www.attra.org/> to look at useful examples.
- 4. Keep records in locations that are accessible for immediate use:** For example, keep the clean equipment log next to the actual piece of equipment in question.
- 5. Determine which types of records you need:** Not every operation needs the same type of records. Records are used to verify compliance with the NOP. They are adapted to your operation and disclose organic activities and transactions.

Remember that to effectively complete the certification process and to comply with all applicable regulations of the National Organic Program, an accurate OSP must be submitted and an adequate record keeping system must be in place. You should always contact us when you have questions regarding the adequacy of your Organic System Plan and record keeping system.

Land Requirement for Certification

Section § 205.202 of the National Organic Program states, “Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as “organic,” must: (a) Have been managed in accordance with the provisions of §§ 205.203 through 205.206; (b) Have had no prohibited substances, as listed in § 205.105, applied to it for a period of 3 years immediately preceding harvest of the crop.”

Your operation must demonstrate compliance with section 205.202.

What does this mean for you?

If you are a landowner - You must provide documentation dating the last application of any prohibited materials on your land. If you did not own your land for the 36 months prior to harvest, then the previous landowner must provide this documentation. If this is the case, please be sure to provide contact information for the previous owner.

If you are renting or leasing land - You must provide documentation from the landowner stating that you (the lessee) have full management control over the leased land and that the landowner will not do anything to jeopardize the organic status of the land. Please provide the contact information for the landowner. You must also provide documentation from the landowner dating the last application of any prohibited materials. If you have been the sole lessee for the past 36 months, then you can provide this documentation.

The QCS application now includes a Letter of Intent for the purpose of demonstrating compliance with § 205.202. However, other documentation, such as a signed letter, may be sufficient to show compliance.

Both landowners and lessees must provide three years of Field History Sheets. However, unless there is a change in land acreage, it is not necessary to resubmit documentation for the land requirement each year.

If you have any questions about the documentation needed to meet land requirements, please contact the QCS office.

TRAINING SEMINARS

Florida Certified Organic Growers and Consumers, Inc. (FOG), a 501(3)C not-for-profit and parent organization of Quality Certification Services (QCS), will hold two training seminars at the end of August. Special Guests include expert inspector and trainer Rick Martinez and organic product development consultant Tom Harding. FOG Executive Director Marty Mesh and the QCS staff will host both sessions.

CONVERTING FROM CONVENTIONAL TO ORGANIC PROCESSING AND MANUFACTURING: Opportunities, Challenges, and Success

Friday, August 26, 2005 from 9 a.m. to 5 p.m. Cost \$75-125*
Tampa Renaissance Hotel International Plaza, Tampa, FL

Included Topics:

- Overview of the Organic Marketplace
- Certification and Inspection Processes
- Requirements of the National Organic Standards
- Converting Specific Conventional Processes to Organic

“This is a great opportunity, not just for conventional processors looking for a roadmap on how to comply with the National Organic Standards, but for the staff of organic processors and manufacturers who need to deepen their knowledge of the regulations. They’ll get a detailed overview, and expert feedback on their questions.”

- Jonathan Austin, Managing Director of FOG.

FOR INSPECTORS ONLY:

Inspecting the Organic Processing Facility

Saturday, August 27, 2005 from 9 a.m. to 5 p.m. Cost \$125-225*
Tampa Renaissance Hotel International Plaza, Tampa, FL

Included Topics:

- Reviewing an Organic System Plan for Compliance
- Developing a Strategic Approach to the Processing Inspection
- Identifying and Categorizing Substances and Materials
- Coordinating with Organic Consultants
- Small Processors vs. Large Corporate Applicants

“Processing operations are one of the fastest growing segments of the organic industry and inspectors should keep pace with this growth. This training is no substitute for an in-depth training sponsored by the Independent Organic Inspectors Association, but it is a good opportunity for an inspector to get some cost-effective continuing education to strengthen or refresh their skills and knowledge.”

- Marty Mesh, Executive Director of FOG

*Cost includes lunch and refreshments. Due to grant support from the Florida Department of Agriculture and Consumer Services, **Florida residents may apply for a reduced attendance fee.** Advance registration is required and each session is limited to the first 100 registrants. Request more information by emailing JLA@foginfo.org or by visiting www.foginfo.org.

Update to Requirements for Products Intended for Market in Quebec, Canada

QCS is recognized by the Conseil des Appellations Agroalimentaires du Québec (CAAQ) to verify that products marketed in Quebec meet the CAAQ requirements. Included in the Quebec Product Entry Acceptance Program (QPEAP) are requirements governing the acceptance of products having organic content and originating from outside of Quebec. These requirements may be viewed at www.caaq.org.



Please be advised that section 4 of the QPEAP has been amended. This section covers the conditions governing the acceptance of products originating from outside of Quebec. The amendment was published on June 6, 2005.

All operations that export products containing organic content to Quebec must adhere to these conditions. Certifiers recognized by the CAAQ must verify that these conditions have been met. Operators must respect the acceptance conditions, particularly those included in Subsections 4.5 and 4.6 (see below) pertaining respectively to the certification of ingredients making up foods exported to Quebec and to the labeling used on products intended for sale in Quebec.

If operators do not comply with the rules governing labels as established by the CAAQ, they must request a temporary exemption from the CAAQ before continuing to distribute these products on the Quebec market. For continuing authorization once this exemption has expired, these product labels must be compliant.

Operations wishing to submit an exemption request must contact the CAAQ by fax or email at 514.873.2580 or info@caaq.org.

Sections 4.5 and 4.6 of the QPEAP

4.5 Ingredients included in food products imported in Quebec

4.5.1 Any food product exported to Quebec must exclusively contain ingredients from agricultural origin coming from companies that were granted for each of their products, a certificate attesting their compliance to the concerned standards (e.g. organic) by one or the other of the following types of organizations:

- a. CAAQ approved certifier, provided that the product origin territory was also accepted by the CAAQ for this body;
- b. Certifiers for whom recognition is obligatory in accordance with the regulatory framework governing the accredited certifier. (i.e. USDA; UKROFS; SENASA; AQIS, etc.) or;
- c. Certifiers with whom the CAAQ approved body has signed a mutual recognition agreement, the legal validity of which has been recognized by an accreditation body (i.e. the agreement signed by IOAS accredited certifiers).

4.6 Labeling of products destined for sale in Quebec territory

The following rules shall be followed by all enterprises producing and preparing agricultural food and products using a reserved designation for the purpose of selling them on the Quebec market. The following essential data elements shall appear both on the product label affixed to packaging and on all commercial documents to this product:

- a. name expressing the content of the product;
- b. lot/batch number, if applicable;
- c. trade name of certification body, indicated in a clear and

- readable format (either full name or initials);
- d. trademark under which the product is sold
- e. identification of enterprise (name or identification code) responsible for producing and/or preparing product;
- f. product's country of origin (location of the operation site inspected by the certification body and which the product originates from).
- g. mention of the reserved designation in accordance with the rules stated below.

4.6.1 Information referring to organic production methods

4.6.1.1 Products shall be considered as bearing information referring to organic production methods when these products or their ingredients are identified using the following terms (or their abbreviations) on labels and in advertising or commercial documents:

- "Organic"
- "Biological"
- "Ecological"
- "Biodynamic"

Any similar term intended to lead retailers and consumers to understand by this reference that these product result from organic agriculture.

4.6.1.2 Section 4.6.1.1 shall not apply when these terms clearly have no connection with the production method (e.g.: ecological house).

Products in their final packing

4.6.1.3 Every finished product whose labeling bears any mention of the term "organic" must always clearly indicate

the name (firm name) of the certifying body having issued the compliance certificate to the operator that carried out the most recent operation resulting in this product. Affixation of the certification seal or logo on the label is optional.

4.6.1.4 When certified agricultural products have less than 100% ingredients of organic origin, persons marketing them shall abide by the following labeling rules:

- a. Any mention on the label that a product is “organic” is only allowed on products where at least 95% (by weight or volume, excluding salt and water) of their ingredients originate from organic agriculture.
- b. The mention “contains X% of ingredients certified as organic” on the packaging is obligatory for those products where between 70% and 95% (by weight or volume, excluding salt and water) of their ingredients originate from organic agriculture.
- c. When a product’s contents are not 100% organic, the list of ingredients shall make a clear distinction between those ingredients that are organic and those that are not. However, the organic ingredients on this list shall be mentioned using a format, color and font style similar to those used to list ingredients not of organic origins. Finally, all additives and processing aids that remain in the products shall appear in the list of ingredients.
- d. The name (trade name) of the certification body that certified every product or checked ingredients of a product displaying the term “organic” on its label shall also be inscribed and easily legible on its packaging. The Labeling Requirements Table attached to this directive indicates the location where the certification body’s name shall appear, in accordance with the product’s composition.
- e. The presence of the certifier’s logo and address are optional for any product containing 70% or more organic ingredients. The presence of a logo is prohibited if a product contains less than 70% verified organic ingredients and also when it is a non-certifiable product that is only subject to an approval (service or input) from the certification body.

4.6.1.5 The product’s list of ingredients must include all the principal ingredients in descending order, according to weights used in the recipe. Secondary ingredients such as spices, seasonings, fines herbs, natural flavoring, vitamins, additives and processing aids that either remain in substantial quantities, fulfill some purpose in the food or alter it in some manner may however be placed at the end of the ingredient list in any order. Non-organic ingredients shall be indicated as such. It is unacceptable that unauthorized ingredients be dissimulated through an overly general statement of ingredient composition.

4.6.1.6 If herbs and spices constitute less than 2% of the total weight of the product, they shall be listed as “herbs” or “spices.” In such cases, the complete mixture used shall be made available to the certification body’s inspector.

4.6.1.7 Any mention of the following items is prohibited, both on the label attached to the product’s packaging and on all transaction certificates referring to them:

- a. Any claim leading to a belief that a food product does not contain any ingredient resulting from genetic engineering (GMO), except if independent tests can prove it and if it is a product composed of one or more ingredients whose equivalent versions can be produced in the form of genetically modified crops.
- b. The term “organic” or one of its synonyms as mentioned in 4.6.1.1 has been affixed to the main panel of the packaging, when the product contains less than 95% organic ingredients originating from organic agriculture.
- c. Any mention added to the label (other than the list of ingredients) which leads to the belief that the product contains organic ingredients when the product contains less than 70% organic ingredients originating from organic agriculture.
- d. The logo of the certification body that verified ingredients of the product when it contains less than 70% organic ingredients.

Fresh fruit and vegetables

4.6.1.8 Operators who produce organic fruit and vegetables intended for the Quebec market must comply with the following labeling rules:

- a. Perishable foods, such as certified fruit and vegetables, shipped and intended for sale in the Quebec market, shall be individually labeled (using stickers or other methods) by the operator holding an organic compliance certificate for these products.
- b. When, due to their specific nature, products cannot be labeled individually (e.g. grapes), then it is the unit of sale (grape or broccoli bunch, parsley bundle, etc.) that shall be affixed with a label.
- c. The operator that holds the certificate shall print its name (or identification codes allotted by the certification body) along with the name of the certifier on all labels attached directly to fruit, vegetables and other food products in this format.
- d. In exceptional cases, when no labels can be affixed to each fruit or vegetable, they shall be packaged with a label affixed. This packaging and labeling is the responsibility of the certificate holder. Labels shall include all information required by Article 4.6.

Organic Products Packaged on a Temporary Basis

4.6.1.9 The containers being used for storage and/or transportation of organic products not yet processed and not yet in their final packing shall list the following information:

- the name and address of those responsible for producing or preparing the product;
- the product name;
- the product lot number;
- a mention of the product’s organic status;
- the name of the certification body for the product.

The documents accompanying them shall include this information along with a proof of certification issued by the certification body (certificate or transaction voucher).

Quality Certification Services
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Gainesville, FL 32604

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QCS WELCOMES THE FOLLOWING OPERATORS WHO RECEIVED INITIAL CERTIFICATION IN THE FIRST HALF OF 2005

Sweetwater Organic Coffee Co. in Gainesville, FL
Straight A Bar in Alpine, TX
Rio Grande Organics, Moses Farm in Houston, TX
Desert Sun Coffee Roasters in Durango, CO
Davis Mountain Organic Beef in Dallas, TX
Combs Ranch in Austin, TX
Exotic Hibiscus in La Belle, FL
Bill Spillers in Miami, FL
Nice Berries in Cedar Grove, NC
Buddy's Natural Chicken in Gonzales, TX
Integrated Agricultural Development Foundation in Taipei, TAIWAN
Bucks County Coffee Company LLC in Langhorne, PA
Georgia Wines, Inc. in Chickamauga, GA
Fanestil Meats in Emporia, KS
Shangrii-La Springs in Naples, FL
Common Ground Farm in Spring Mills, PA

Ayrshire Farm Main House Kitchen in Middleburg, VA
Michael F. Wille in Wauchula, FL
Tampa Farm Service Inc. in Dover, FL
OceanBoy Farms, Arcadia Farm & Walpole Facility in Clewiston, FL
La Colmena in Tampa, FL
Allen Blueberry Inc. in Citra, FL
Back to Nature Foods Company ADM Veggie Plant in Madison, WI
Boca Burgers and Sausages (Made With Organic Ingredients)
Rise 'N Shine in Ranger, GA
Mount Air Farm in Crozet, VA
San Giorgio Coffee in Hollywood, FL
Leonard Pecan Farm in Eagle Pass, TX
Gustafson's LLC in Green Cove Springs, FL
Fischer's Meat Market in Muenster, TX
Caldwell Citrus Groves LLC in Leesburg, FL
Sun Valley Pecan Company in Fabens, TX

Reminder: Organic Costshare Applications Due No Later Than September 1, 2005

The USDA National Organic Cost Share program reimburses certified organic operators 75% of the costs of organic certification, up to a maximum of \$500. Please be sure to send in your application no later than September 1, 2005. If you need an application and have not received one, please visit the QCS website at www.qcsinfo.org, or email Jonathan@qcsinfo.org. If you have already submitted an application and are awaiting payment please be patient and be assured that payment will be on its way shortly.