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2011 ISDA Organic Newsletter

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Organic Certification Cost Share Program

An increase in outreach and available funds led to an increase in the money reimbursed to organic operations in Idaho through the Organic Certification Cost Share Program in 2010. This trend is projected to continue in 2011. The Organic Certification Cost Share Program reimburses eligible producers and handlers 75% of the costs of organic certification up to \$750. In 2008, Congress allocated \$22 million for the program as part of the Food, Conservation and Energy Act of 2008. The Idaho State Department of Agriculture (ISDA) administers the funds in Idaho. In an effort to increase awareness of the Cost Share Program, the ISDA increased its efforts to spread the word. Several mailings were sent to certified operations in the state. The announcement and appli-

cations were also sent along with certificates. An announcement was posted on the ISDA webpage along with the application. There was even a post on the ISDA’s Facebook page. All of this outreach led to an increase in applications. Idaho’s allocation of the federal money increased from \$20,000 in 2009 to \$60,000 in 2010 and has increased again to \$100,000 in 2011. During the 2010 Cost Share year, \$54,963.89 was awarded to 85 operations; this is a 300% increase from 2009. In 2010, only 22 applicants were denied. The ISDA approved applications and awarded reimbursements only to applicants who met the requirements and provided an application, a copy of their current organic certificate, proof of payment of the costs associated with cer-

tification, and a W-9. To simplify the process, in 2011, the application for organic certification doubles as the application for cost share. With another increase in available funds, we encourage organic operations to take advantage of Organic Cost Share Program. Betsy Rakola, Cost Share Manager, with the USDA, has stated the following regarding ISDA’s changes to the program; “The fact that more producers and handlers are applying for reimbursement is a testament to the work you are doing. Thank you for your efforts to reach out to the organic community about the cost share program. It is wonderful to see this sort of response.” For more information, visit our webpage at www.agri.idaho.gov.

Idaho Organic Law and Rule Updates

ISDA has proposed the following changes to the Organic Food Product Law and Rules, which are pending “Adoption” by the 2011 Legislative Session:

- Elimination of the “Education Requirement” of 22-1103 because the requirement is more strict than the NOP Rules and Regulations which is not allowed under 205.501(b)(2).
- Update the incorporation by reference of 7CFR Part 205 National Organic Program Regulations which will include the new pasture requirements.
- Elimination of providing ISDA Organic Seal stickers because ISDA cannot review and approve the labels as required by the NOP.
- All uses of the term “Gross Organic Income” within the text will be changed to Gross Organic Sales in order to better clarify the requirements.



“An organic farm, properly speaking, is not one that uses certain methods and substances and avoids others; it is a farm whose structure is formed in imitation of the structure of a natural system that has the integrity, the independence and the benign dependence of an organism.”

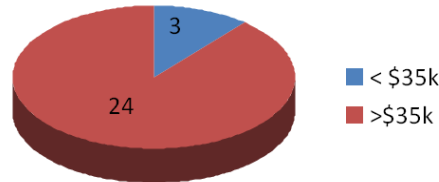
**Wendell Berry,
Farmer and Author,
Hendry County,
Kentucky, 1982**



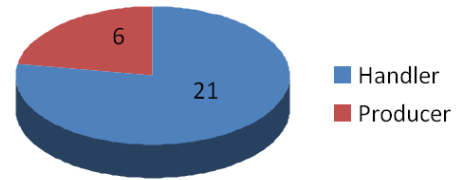
Organic Cost Share Distributions

During the 2009 Organic Food Advisory Council a motion was passed for the Organic Program to analyze cost share distributions based on type and size of the operation. A motion was also passed at that time to set \$35,000 as the divider between small and large operations. The following was presented to the 2010 Organic Food Advisory Council:

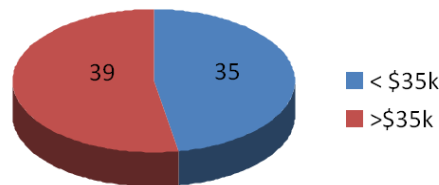
Size of Operations Awarded in 2009



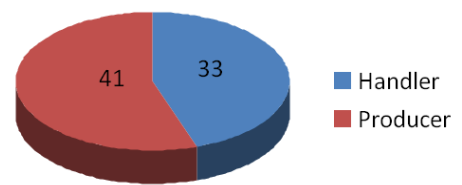
Type of Operations Awarded in 2009



Size of Operations Awarded in 2010



Type of Operations Awarded in 2010



“Spot Spraying”

The United States Department of Agriculture National Organic Program (USDA-NOP) requires the management of weeds in organic production (Section 205.206). The NOP states that weeds can be controlled through: crop rotation, sanitation measures, cultural practices, mulching with fully biodegradable materials, mowing, grazing, hand weeding or mechanical cultivation, flaming, plastic and synthetic mulches (provided that they are removed from the field at the end of the growing or harvest season). In situations when the above practices are insufficient to prevent or control weeds, a biological,

botanical, or other substance included on the National List may be used to control weeds; provided that the practices are described in the organic system plan. During the 2010 crop season, inspectors discovered that some producers were “Spot Spraying” with prohibited substances, in the middle of organic fields. Going into the 2011 crop season “Spot Spraying” will not be allowed and may result in adverse action. Your organic field must have distinct, defined boundaries and buffer zones to prevent the unintended application of a prohibited substance. Previously affected fields and areas will require de-

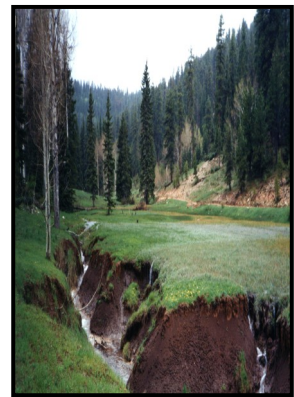
scribed buffer zones. However, if a field looks like a slice of Swiss Cheese due to Tordon applications, the entire field must be removed. This issue was presented during the 2010 Organic Food Advisory Council meeting and it was agreed by all members that “Spot Spraying” should not be allowed. For links to WebPages with information on weed management, please visit our website at www.agri.idaho.gov

Crop Rotation

205.2 “Terms defined” of the NOP defines crop rotation as the practice of alternating the annual crops grown on a specific field in a planned pattern or sequence in successive crop years so that crops of the same species or family are not grown repeatedly without interruption on the same field. The purpose of the crop rotation requirement is the following:

- Maintain or improve soil organic matter (SOM) content by contribution of plant residue and providing fodder for soil organisms that process, stabilize and build SOM.
- Provide for pest management (Noxious Weeds) by breaking patterns of adaptation and increasing the population, diversity and vitality of soil organisms that counteract pests.
- Manage deficient or excess plant nutrients through biological fixation, direct uptake and release, nutrient availability from root exudates and improved Cation Exchange Capacity.
- Provide erosion control by increasing the amount and diversity of soil coverage, soil aggregate stability and water-holding capacity.

During the 2010 crop season inadequate crop diversity was observed at many wheat operations. Wheat to summer “black fallow” crop rotations were commonly observed as the primary method of rotation which does not meet the 205.205 “Crop Rotation” standard. Fallow must include a green manure crop. Voluntary weeds cannot be accepted as a green manure crop. Operations which have an inadequate rotation combined with evidence of a decline in SOM, decline in fertility, inadequate weed control or soil erosion will be issued a Notice of Noncompliance with the requirement to implement a more effective crop rotation which does not include “black fallow”.



ISDA Staff Training

The ISDA Organic Program strives to serve the organic community by having knowledgeable staff that are proficient in organic practices and standards. In March, the ISDA will host the International Organic Inspectors Association (IOIA) Basic Livestock Training. Employees from the Montana and Washington Departments of Agriculture, in addition to ISDA Organic Program Staff, will attend this rigorous week-long training in Twin Falls. The IOIA is a professional, non-profit association that provides comprehensive organic inspector training worldwide. Its mission is to promote consistency and integrity in the certification process. The training will include a mock inspection at Natures Harmony Organic Dairy, operated by Sean Mallett. Attendees will be graded based on the quality of the inspection report written for the mock inspection and final exam. The outcome of the training will result in highly proficient ISDA organic livestock inspectors who will be able to verify compliance to the National Organic Program Rules and Regulations; including the new “Pasture Rule.”





Nonpayment of Inspection Fees

To date, 61 companies that have been invoiced have not paid inspection fees totaling more than \$24,244.06 for the 2010 season. This issue was also presented to the 2010 Organic Food Advisory Council. It was recommended that ISDA have consideration for organic producers, that may be going through difficult times, but to revoke the certificates of repeat offenders or producers that do not pay for services. The Organic Program is more than willing to work with producers and on many occasions has worked out payment plans for owed fees. If there is a reason a fee cannot be paid upon receiving an invoice, please do not hesitate to contact an Organic Program Staff Member. Operations that do not pay owed fees and make no arrangement for payment with ISDA will be subject to certificate revocation and will be unable to qualify as a certified operation for 5 years.

Pesticide Residue Sampling

The USDA is now requiring pesticide residue sampling by Accredited Certifying Agents (ACA's). ACA's have been directed to collect samples under the following circumstances:

- When it is suspected that a prohibited substance has been applied.
- When it is suspected that contamination from genetically modified organisms, antibiotics, or prohibited substances may have occurred.
- When pesticide drift may have occurred.
- To gather evidence as part of an investigation.
- As part of a surveillance sampling program.

It is important to remember that compliant organic operations rarely test positive for pesticide residues. The presence of pesticides or genetically modified organisms does not necessarily preclude an organic crop from being marketed and sold as organic:

Investigation Determines That Pesticide Was Unknowingly Applied

- Test results are below 5% of EPA tolerance level, then a Notice of Noncompliance will be issued but crops **MAY** be sold as organic.
- Test results are at or above 5% of EPA tolerance level, then a Notice of Noncompliance will be issued and crops **CANNOT** be sold as organic.
- Test results identify a registered pesticide but not for the crop being tested, then a Notice of Noncompliance will be issued, the EPA or FDA will be notified and crops **CANNOT** be sold as organic.
- Test results identify a non-registered EPA substance below the FDA action level, then a Notice of Noncompliance will be issued but crops **MAY** be sold as organic.
- Test results identify a non-registered EPA substance above the FDA action level, then a Notice of Noncompliance will be issued, the EPA or FDA will be notified and crops **CANNOT** be sold as organic.

Information on EPA tolerance levels and FDA action levels can be found at:

1. <http://www.epa.gov/opp00001/regulating/tolerances.htm>
2. <http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/GuidanceDocuments/ChemicalContaminantsandPesticides/ucm077969.htm>



**IDAHO STATE
DEPARTMENT OF
AGRICULTURE
(ISDA)
ORGANIC
PROGRAM**

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Categories/PlantsInsects/
Organic/
OrganicFormsReportsPubs.php](http://www.agri.idaho.gov/Categories/PlantsInsects/Organic/OrganicFormsReportsPubs.php)



Organic Promotion and Education Before Regulation.

ISDA ORGANIC PRODUCER TRAININGS

9:30 am on Monday, April 4, 2011

Farm Bureau Building
2732 Kimberly Road
Twin Falls, ID 83301

9:30 am on Tuesday, April 5, 2011

Meridian Center
310 North Meridian Street, Suite D
Blackfoot, ID 83221

10:30 am on Thursday, April 7, 2011

U of I Extension Office
1808 North 3rd. Street
Coeur d'Alene, ID 83814

9:30 am on Friday, April 15, 2011

Idaho Department of Agriculture
2270 Old Penitentiary Road
Boise, ID 83701

The Idaho State Department of Agriculture's (ISDA's) Organic Program will be providing an outreach and education campaign to inform organic producers and other interested parties about the National Organic Program's (NOP's) movement towards, what they are calling, the "Age of Enforcement". ISDA plans on providing 4 workshops, across the State, outlining relevant topics including key programmatic changes, common organic concerns and NOP compliance. The objective of these workshops is to stay in tune with the Department's Mission Statement and Goals of education before regulation as well as being proactive through working closely with the agricultural industry. All workshops will be free of charge. For questions or further information, please contact Brandon Lamb at 208-332-8675 or brandon.lamb@agri.idaho.gov.

Inspection Costs

As you can see from the graph below, inspection costs have gone up, on average, by over 60%. This is due mainly to the increase in education and training for Organic Inspection Staff and imposed requirements by the USDA. Judith Ragonesi, NOP Training Director, has stated the following regarding organic inspections: "Organic inspections should be between 3-6 hours per operation depending on complexity of operation and preparation of operator." Therefore, an organic inspection cannot be completed properly in an hour as

has been done in the past. This also means that if an operation is certified to all three scopes; the inspection can last as long as 12 hours. However, with the increase in cost-share monies available to operations the cost of certification in 2010 was actually comparable to 2009.

