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Sound and Sensible Organic Certification

By Katie Webb, Dairy Certification Specialist

The first time I heard of “Sound and Sensible” certification was at the National Organic Program (NOP) annual training in Florida in January of 2013.

The NOP Deputy Administrator (Miles McEvoy) stood at the head of the room. Certification has become too burdensome for the farmer, he said. It is too bureaucratic. Certifiers’ recordkeeping expectations are out of touch with the reality of running a farm. The paperwork is too difficult, and there’s just too much of it.

This is too good to be true!

The USDA is endorsing a new philosophy to guide the way that certifiers do their job. The impetus for change has come from both above and below, so to speak: the upper administration at the USDA desires increased participation in the organic program and has been listening to small farms and businesses that simply don’t have the hours in the day or the dollars in their budget to meet paperwork and recordkeeping expectations as they now exist. What everyone wants is to reduce barriers to organic certification.

The following day at that same conference, Mac Stone, a diversified farmer from Kentucky and the Certifier representative to the National Organic Standards Board (NOSB), led a two-hour brainstorm session to get certifiers thinking in a new way. What are the barriers to certification? How can we reduce the burden on the farmer while maintaining organic integrity? Here are the key principles of the Sound and Sensible approach, in the words of the NOP:

**Overall Goal:** Organic certification that is accessible, attainable, and affordable.

**Five Principles of Sound and Sensible:**

1. **Efficient Processes:** Eliminate bureaucratic processes that do not contribute to organic integrity.
2. **Streamlined Recordkeeping:** Ensure that required records support organic integrity and are not a barrier for farms and businesses to maintain organic compliance.
3. **Practical Plans:** Support simple Organic System Plans that clearly capture organic practices.
4. **Fair, Focused Enforcement:** Focus enforcement on willful, egregious violators; handle minor violations in a way that leads to compliance; and publicize how enforcement protects the organic market.
5. **Integrity First:** Focus on factors that impact organic integrity the most, building consumer confidence that organic products meet defined standards from farm to market.

What does “Sound and Sensible” mean for Maine farms that are MOFGA certified organic?

You may recall our article “MCS 2012 USDA Audit” in our Winter 2012-2013 issue of this newsletter in which we described changes that our program must make in order to maintain our USDA Accreditation. In light of the new Sound (Continued on Pg 2)
Sound and Sensible
(Cont’d from Pg 1)

and Sensible Initiative, many of those findings should be considered out-of-date.

For example, we were instructed to delay inspection of farms if all paperwork is not completely filled out; the NOP now says that inspectors can collect certain kinds of information during inspections. Another example: we were told to issue more Noncompliance Notices to farms for minor issues; the NOP is now saying that we should resolve minor issues without Noncompliances and reserve adverse actions notices for egregious/willful violations. On these two points, at least, it appears MCS will be not be departing from its previous approaches to certification.

So, in many respects, we at MOFGA have been sound and sensible about certification all along. We were the first USDA-accredited certifier to re-produce the farmers’ organic system plan in its entirety to offer as a renewal, collecting only new information and changes, as opposed to having farmers fill out long forms each year. We have always understood that records can be a challenge, especially to smaller operations, and we continue to offer assistance to producers as well as time to demonstrate improvements and compliance.

And we plan to do more. Here are program improvements that MOFGA Certification Services has completed recently, as well as some of our future plans:

- Last summer, Crop and Livestock working groups made up of volunteer farmers and others worked to streamline our Farm Plan paperwork.
- We held inspector trainings to keep our inspectors up-to-date on Sound and Sensible expectations of recordkeeping, and to tell them ways to provide information directly to the farmer.
- We revised the inspection report forms to focus on observing farm practices and as well as records.
- Maine has the highest participation in the Organic Cost Share Program (AMS) in the Nation, which provides farms with 75% reimbursement of certification fees, making farm certification more affordable.
- We enabled web-based renewal options for crop operations and hope to have this option for everyone by the end of 2014.
- Certification staff is working with MOFGA to promote the MOFGA Certified Organic brand. More consumers need to recognize, seek and buy MOFGA certified organic.

MOFGA Certification Services believes that our roots as a farmer-based organization, as well as our staff with strong farming backgrounds, have both shaped our operating principles to be well aligned with Sound and Sensible principles in many ways. And, we aspire to continue working toward improvements in our program. Please let us know how our program has served you well and how we can make organic certification more sound and sensible.

If you wish to contribute to the national discussion on Sound and Sensible Certification, you can also contact Mac Stone, Certifier Representative to the NOSB. For more info: http://www.ams.usda.gov.
Update on the Food Safety Modernization Act

by Cheryl Wixson

The FDA has extended the public comment period to September 30, 2013, for the Food Safety Modernization Act (FSMA) that was signed into law on January 4, 2011. The proposed rule, Standards for Growing, Harvesting, Packing, and Holding of Produce for Human Consumption, has the broadest potential to affect farmers and growers here in Maine. This rule applies to most fruits and vegetables while they are in their raw or natural (unprocessed) state. Known as RAC (raw agricultural commodities), examples would include cucumbers, lettuce, tomatoes and radishes. It does not apply to raw agricultural products that are rarely consumed raw, like potatoes.

This produce safety rule is aimed at helping the FDA prevent food safety problems by providing science-based minimum standards for safer production of fruits and vegetables that address worker training, health and hygiene, agricultural water, biological soil amendments of animal origin (manure), domesticated and wild animals, equipment, tools and buildings, and sprouts.

As it stands currently, the Tester-Hagan amendment does provide for some qualified exemptions from the rule. Farms with less than $25,000 of yearly sales are exempt. Farms with less than $500,000 in annual gross sales and more than 50% of the product sold directly to “qualified end users” (consumers or restaurants in-state or within a 275-mile radius of the farm) would be exempt from these regulations but still would be subject to modified rules. Details remain to be explained, such as which records need to be kept by farms that qualify for an exemption and how a farm regains its exemption after the FDA has retracted it. For more information and frequently asked questions: http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm247559.

Since February, Dave Colson and I have been participating in weekly National Sustainable Agriculture Coalition conference call meetings with other organic and sustainable agricultural groups to identify areas of concerns for diversified family farms in complying with the rules and to help develop strategies for the public comment period.

The components of the educational program that MOFGA developed in anticipation of FSMA for farm food safety and the sample Farm Food Safety Plan line up in most cases with the FDA’s proposed rule. The areas of concern that we are monitoring and preparing for public comment include agricultural water, biological soil amendments of animal origin, and some questions surrounding the food sales and exemptions.

Agricultural water has been identified as a major source of potential contaminants entering into the food stream. The current rule as proposed requires that water used to wash produce be tested at the start of the harvest season and every quarter thereafter. For most farms in Maine, this could be 3 water tests per year. In addition, the rule would also apply to water used for irrigation from surface water sources, such as ponds or streams. The FDA has proposed testing these surface irrigation sources as often as weekly.

The waiting period for the use of biological soil amendments, or manure, does not line up with the National Organic Program standards, as the FDA has longer waiting periods and more stringent production applications. Harmonizing these regulations would help to avoid confusion for on-farm manure and compost use.

MOFGA will be preparing guidance information for farmers, growers and consumers wishing to provide public comment to the FDA on the rule, in particular in the area of exemptions for small farms and farms that sell directly to the consumer, and areas of concern for certified organic farmers.

The proposed FDA rule does not require a “verified” food safety plan, only that one exists. This allows an opportunity for discussion with markets that currently require GAP certification and the potential for certified organic growers to gain access to these markets.

MOFGA supports a safe and secure food supply for the consumers. A science-based approach to farm food safety is in everyone’s best interest, and education is the key. Currently, we are working with the Maine Department of Agriculture, Forestry and Conservation to develop a food safety strategy for Maine that could provide all Maine farms with a set of standards and protocols that would satisfy the FDA and be administered by the state.

Cheryl Wixson is MOFGA’s agricultural engineer and food safety specialist. For more information and a copy of MOFGA’s sample Farm Food Safety Plan, please contact her at Cheryl@mofga.org or 207-852-0899.

Dave Colson is Director of Agricultural Services. Contact Dave at 568-4142 or DColson@mofga.org.

See Page 6 for additional resources on the FSMA.
Harvest Records
by Dave Colson, Ag Services Director

To evaluate a farm’s financial and production goals, growers need to have a handle on farm sales. But just recording sales doesn’t show the whole economic picture, as it does not count available, unsold product or product culled due to quality or size. Harvest records can quantify these losses and can also provide valuable information for food safety traceability, organic certification and farm planning.

How much information is necessary and helpful depends on farm size, the specific crops grown and how crops are marketed. Most diversified vegetable operations have two major categories of crops. The first category includes crops that, once established, can be harvested multiple times during the season, such as chard, kale, winter squash and many herbs. For these, the amount harvested corresponds to the estimated amount needed for farm sales. Crop location is the same for each harvest and the quantity harvested directly relates to the quantity sold. So for these crops a simple sales record, such as farmers’ market crop total, a CSA share list or a wholesale invoice, will suffice as a harvest record.

The second crop category includes crops planted in succession or in multiple locations and harvested multiple times, such as green beans, broccoli, head lettuce and carrots. For these, a computer spreadsheet or notebook may be best for recording the date, location and amount of each crop harvested, along with when the crop was packed for sale, if sales occur on a separate date. This information will help answer questions regarding a food safety issue and will provide traceability. In these records, date and quantity are relatively straightforward, but how much detail is necessary for recording the location? For some farms a simple field number or name would suffice. For farms with a broad range of crops in one or more fields, a bed numbering system or a way to identify specific growing areas is best.

Multi-ingredient products, such as a salad mix, are value-added products since they contain multiple ingredients and have been cut and prepared for the customer. Harvest records for these crops may require a spreadsheet or harvest notebook in which the date, variety, location and amount can be recorded. It can also be beneficial to record weights after the wash step, as weights can vary depending on field and weather conditions. Under dry conditions a harvest record of 50 pounds of mixed greens with sales invoices totaling 60 pounds is not uncommon due to water retention during the washing step. Likewise, spinning off weight after a rainy day harvest can throw off numbers.

The final step to wrap these pieces together, especially for restaurant or wholesale accounts, would be to add an audit trail. Again, depending on the size of an operation, a lot numbering system that incorporates date, location, crop and other pertinent information may be necessary. For farms that market to local restaurants and retail outlets and that maintain harvest logs, a date marked on the farm label and on the invoice would satisfy the audit trail requirements for certification and would help in case of a food safety recall.

Farm records should first serve as a tool to improve your farm operation. If those records can also satisfy requirements for organic certification or food safety, then you’ve accomplished two tasks at once, always a good thing on a busy farm.

For additional information, harvest templates and other record-keeping forms, search ATTRA (www.attra.org) for Organic System Plan Template for Crop and/or Livestock Production.
Shared Use Farm Equipment Available

by Katy Green

A partnership between MOFGA and Maine Farmland Trust as well as support from USDA Natural Resources Conservation Service has allowed the shared use farm equipment pool housed at MOFGA to expand. The pool was established in 2012 and originally contained a plastic mulch layer, two-shank sub-soiler, and a seedbed cultivator. In 2013 a two-row ridge tiller and two-row strip tiller were added to the pool. These new pieces of equipment will allow growers to try out a reduced tillage technique without purchasing new equipment. Both of the additions are designed for farmers to easily replicate or adapt to their specific conditions as well as require less horsepower than many of the reduced tillage machines on the market today.

The two reduced tillage toolbars have a great deal in common in that they are simple to operate, provide reduced tillage options proven to work in our climate, and save time and fuel. In addition to many of the crop rotation strategies that organic farmers already employ, reduced tillage can further boost soil health and benefit the farm in a number of ways.

Ridge till typically disturbs only the top few inches of the soil and can achieve high levels of soil erosion control. Nicolas Lindholm of MOFGA Certified Organic Hackmatack Farm in Penobscot gave a great presentation of his ridge till system at MOFGA’s 2012 Farmer to Farmer Conference.

Strip till disturbs only a band of soil where crops will be planted and leaves the areas between the rows undisturbed. A benefit of both of these systems is that the ground prep can take place during different times of year. For more information on reduced tillage or to request a copy of Nicolas’ presentation, contact Katy Green (kgreen@mofga.org). For more information about any of the equipment in the Shared Use Farm Equipment pool, contact Mike Gold at Maine Farmland Trust, mgold@mainefarmlandtrust.org or 207-948-6575.

Pesticide Applicator Licensing

by Jean English

Maine organic growers: Do you apply spinosad to your sweet corn? Pyganic on your carrots? You may need a pesticide applicator’s license!

By April 1, 2015, any Maine grower who sells annually more than $1,000 worth of plants or plant products intended for human consumption and who uses any general-use pesticide – one with an EPA registration number on the label – on those crops must be licensed by the Maine Board of Pesticides Control (BPC).

This law applies to those who grow fruits, vegetables, herbs and grains for human consumption; to growers of the above crops who make bread, jam, french fries, wine, cider, juice, etc., or sell produce to be processed into such products; and greenhouse growers selling fruit, vegetable and herb seedlings.

The Agricultural Basic pesticide license is for growers who use only general-use pesticides on property they own or lease.

To obtain an Agricultural Basic pesticide applicator license, growers must pass the BPC core exam, which is based on the Pesticide Education (Core) Manual (available from UMaine Cooperative Extension at http://umaine.edu/ipm/pesticide-safety/certification-manual-prices/ or by calling 207-581-3880). The exam can be taken at the BPC office in Augusta (207-287-2731) or at county Cooperative Extension offices. Contact the BPC office to have the exam mailed to the Extension office and then arrange with Extension to take the exam. Licenses expire on October 31 of the third year after issuance and cost $15. To maintain a license, growers must obtain three hours of continuing education credit during the three-year license period. For more information, see Chapter 33 of the BPC rules at www.thinkfirst-spraylast.org.
MOFGA's Farm Training Projects begin May 22nd! These workshops are designed for and targeted to participants in MOFGA's Apprenticeship Program but are free and open to anyone interested.

The workshops follow an informal format. They generally begin in the late afternoon with a farm tour, followed by a presentation and demonstration on the topic of the day. Participants are then invited to stay for a potluck supper and discussion - bring a dish or something fresh from the farm to share.

Starting with the Soil: Sustainable Soil Management

- **Wednesday, May 22 - 5 pm** at Six River Farm, Bowdoinham
- **Thursday, May 23 - 5 pm** at Village Farm, Freedom

Healthy, living soil is the foundation of successful organic agriculture. Join MOFGA staff and several successful organic farmers for an introduction to organic soil fertility management and the use of rotation, composting, green manures, cover crops, and tillage strategies to build organic matter and enhance the health and productivity of farm soil. This is also the inaugural event of the 2013 MOFGA apprentice season, and a good chance to meet MOFGA staff and fellow apprentices from other farms.

Additional Resources on the Food Safety Modernization Act (FSMA):


Overview of Proposed Rule under Food Safety Modernization Act for Preventive Controls for Human Food: Current Good Manufacturing Practice and Risk-Based Preventive Controls for Human Food. [http://www.fda.gov/food](http://www.fda.gov/food)

PEST Reports...are you getting yours?

MOFGA Organic Crop Specialist Eric Sideman, PhD., compiles a report every week or two during the heart of the season highlighting problems happening now or likely to show up soon. Eric hears about problems from growers all around the region, so please help out and let him know if a big or unusual pest problem exists in your area.

To sign up to receive the report via email and to access current year reports, as well as archived reports for the past 5 years, visit [http://www.mofga.org/Publications/PestReports/tabid/732/Default.aspx](http://www.mofga.org/Publications/PestReports/tabid/732/Default.aspx).
Farm inspection season is upon us! I thought it would be handy to cover how the farmer and the inspector prepare for the annual farm inspection.

**Vocabulary refresher.** The person who visits your farm and does the inspection is The Inspector. This person is often referred to as The Certifier, but this is not correct. The Inspector does not make certification decisions. The inspector is a part of the larger Certification Program. The inspector “ground truths” your organic system plan and records observations for the certification staff to consider.

**Who are the Inspectors?** We have a staff inspector, Jake Galle. He did 150 inspections last year, so chances are many of you got to know him. Other office staff step out and do inspections on occasion too. Six to eight seasonal inspectors whom we hire on a per assignment basis do another 150 or so inspections. They have IOIA training (International Organic Inspectors Association) and most live and work around the State. Some have been inspecting for MOFGA for over 15 years.

**Fact or Fiction?** A certified grower thinks that he needs his annual inspection to take place by a certain date each year in order to market his crops as organic. Fiction, mostly. If you are a first time applicant (not yet certified), then yes, an organic certificate cannot be issued before the inspection. But, if you are already MOFGA CERTIFIED for crops, then you continue to be CERTIFIED for crops the next season, regardless of when your inspection takes place. We like to mix up the dates of the annual inspection so we get snapshots of your operation at different times of the year. While most farm inspections take place between June and August, some inspections will be later or earlier. If you have livestock, doing a winter inspection on occasion makes sense; we want to see if animals have clean indoor accommodations and daily outdoor access. Remember, your CERTIFICATE is good until surrendered, suspended, or revoked. There are responsibilities on both sides. Should you ignore your annual renewal paperwork deadlines or fail to pay fees, we will pursue suspension of your organic certificate.

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**Preparing for the Annual Organic Farm**

*by Mary Yurlina, MCS Director*

When your inspector calls to make an appointment, be sure to write down his or her name and phone number. The inspector should be able to give you an idea about how long the inspection will take based on your organic farm plan.

The inspector must conduct the inspection with the organic certificate holder, which is typically you, the farmer who owns the farm. Sometimes an “authorized representative” needs to be appointed to conduct the inspection, which is something you need to talk to your certification specialist about before the inspection.

The inspector will want to walk through your facilities (barns, sheds, etc) and your fields. Offer to take your inspector on this tour first. It’s a good icebreaker and the tour will help the inspector make better sense of your records.

If there are key staff who are needed to explain what takes place at certain points in the tour, please make sure they are available and able to answer questions.

If you are already certified and have a lot of fields, the inspector may select certain fields to visit and not others.

When you call to make an appointment, explain that you are the organic inspector hired by MOFGA Certification Services to do the annual farm inspection. Leave your contact phone number and make sure you know where to meet the farmer.

While on the farm tour, if you pass by outbuildings, ask about them. They may be for storage of materials or equipment and you’ll want to check them. You will save everyone time if you do this while on your walk-about. It’s inefficient to have to go back out later to revisit an area.

Are there a lot of materials on the shelf that are not in the OSP? Will you be there all day if you try to write down all the label information? A camera will come in handy for this task. Just make sure the images you capture offer legible text.

When I inspect, I like to take the tour first, then sit down to review records. I find that I understand the records much better having seen the layout and activities on the ground.
Preparing for The Annual Organic Farm Inspection (Continued from Pg 7)

The Farmer Side (cont’d)

Inspectors may want to look into storage areas, pesticide cabinets, barns and walk-in coolers. Part of their skill set is being curious and thorough, which are good qualities when it comes to verifying compliance and protecting the organic label. They will want to observe what equipment you have and ask about equipment you may bring in from other places for various tasks.

The inspector will want to review your records. Having a table and chair available to sit down with your inspector will facilitate this activity. Wind and rain are bad for looking at paperwork! Collecting and organizing all the records involved in your operation for one sit down with your inspector is a time saver.

Things to have ready at your inspection:

✓ Production and use/sales records for the PREVIOUS year.

✓ Production and use/sales records for the CURRENT year.

✓ Applicable State and Federal Licenses for what you do.

✓ Receipts for inputs. This shows that you buy and use the materials you list in your organic system plan. Inputs includes things like seeds, organic livestock feed, processing aids, organic ingredients, equipment sanitizers, fertilizer…

✓ Documentation that inputs like livestock feed are certified organic. You should have a grain slip or a receipt that states the feed is certified organic.

✓ Activity logs and calendars

✓ If you use prohibited materials—perhaps because you are a split operation or you had sick animals that needed treatment—you need records to demonstrate that materials were used appropriately.

✓ Records needed to do a mass balance and an audit trail (trace back). For example, if you sell 1000 pounds of tomatoes in a season, the inspector should be able to see sales records as well as evidence that you grew enough tomato plants to produce at least 1,000 pounds. If you grew tomatoes in multiple fields or greenhouses and sell to different types of markets, you may also need to have harvest records and lot numbers.

We hope you have a great season. Our inspectors are looking forward to visiting your farms.

The Inspector Side (cont’d)

Remember to ask the farmer about any changes to the farm plan that may have occurred since the last inspection or since the renewal paperwork was submitted. Check out the new things and write about them in your report. Do you need to collect any new maps or other documents to give to certification staff?

Be adaptable. If the appropriate setting is lacking for reviewing paperwork, use your vehicle. Try to accommodate both you and your host so you can discuss the records as you look through them.

Sometimes the records you want to see are dispersed across an operation. Be thinking of this possibility and ask about possible records as you visit different buildings and talk to different employees. Once again, having to retrace your steps or drive back to someplace you were already takes additional time.

Things to bring to your inspection assignment:

✓ The inspection file, which includes the inspected party’s OSP, letters and questions from MCS staff, maps, etc.

✓ Scrap paper, notebook

✓ Pens, pencils—have back ups. Be able to write when it’s wet.

✓ Calculator

✓ Camera

✓ Phone

✓ Identification

✓ Proper attire. Be particularly mindful about footwear. Close-toed shoes or boots are almost always preferred if not required. Livestock inspectors should carry plastic disposable boot covers or the materials to disinfect footwear in front of the producers. Diseases are a serious matter—we do not want to be vectors!

✓ Helpful give away items such as MOFGA’s directory of technical advisors and MCS-approved material lists.
Events & Training

**May**

- **28** - Conservation Farm Tour. 4 p.m., Goranson Farm, Dresden. View the farm’s reduced tillage techniques. RSVP to kgreen@mofga.org.

- **29 & 30** - Farm Training Project: Greenhouse Management, Wednesday, May 29 at 5 pm, Peacemeal Farm, Dixmont and Thursday, May 30 at 5 pm, Broadturn Farm, Scarborough.

**June**

- **4 & 5** - Farm Training Project: Intro to Farm Equipment: Safety, Operation & Basic Maintenance, Tues., June 4 at 5 pm, Deri Farm, N. Yarmouth and Weds, June 5 at 5 pm, MOFGA, Unity.


- **15** - Farm & Homestead Day at MOFGA. 9 a.m. to 3 p.m. (Scything begins at 7 a.m. and classes start at 9 a.m.) Free! Information on our web page or contact Joe Dupere at jdupere@mofga.org.

- **15** - FAMACHA Workshops for Sheep and Goat Producers at MOFGA. Saturday, 11 a.m. to 1 p.m., Unity. Presented by Dr. Thomas Settlemire and Dr. Richard Brzozowski. Participants will receive an information packet, record sheets and a FAMACHA card. $20.00 per farm. Info: http://umaine.edu/cumberland/programs/2013-famacha-workshops/.

- **19 & 20** - Farm Training Project: Ecological Weed Management - Weds., June 19 at 5 pm, University of Maine Rogers Farm, Orono and Thurs, June 20 at 5 pm, Crystal Spring Farm, Brunswick.

- **26 & 27** - Farm Training Project: Ecological Pest Control - Weds., June 26 at 5pm, Hatchet Cove Farm, Warren and Thurs., June 27 at 5 pm, Black Kettle Farm, Lyman.

**July**

- **1 & 2** - Farm Training Project: Livestock Management Mon., July 1 at 5 pm, Mandala Farm, Gouldsboro and Tues., July 2 at 5 pm, Old Crow Ranch, Durham.

- **11** - Farm Training Project: Farm Woodlot Management, Thurs., July 11 at 5 pm, Hidden Valley Nature Center, Alna.

- **16** - Farm Training Project: John Bunker Homestead Tour, Tues., July 16 at 5 pm, Super Chilly Farm, Palermo.

- **25** - Farm Training Project: Thinking outside of the Vegetable Box - Innovative diversification and stewardship strategies for a small Maine farm, Thurs., July 25 at 5 pm, Miel Farm, Auburn.


27 - MOFGA’s Organic Orcharding Workshop: Bud Grafting. $30. Thorn-dike. Learn this method to propagate fruit trees and many ornamentals. Taught by Delton Curtis of Curtis Pond Nursery, grafter for FEDCO trees. Course will run from 10 a.m. to 1 p.m.

31 - Farm Training Project: Farming with Horses and Work Song Hoote-nanny, Weds., July 31 at 5pm, North Branch Farm, Monroe.

For a full calendar of events please visit: http://www.mofga.org/tabid/417/Default.aspx