

Preparing for the Annual Organic Farm Inspection

by Mary Yurlina, MCS Director

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.

The Farmer Side

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.

The Inspector Side

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.

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Preparing for The Annual Organic Farm Inspection *(Continued)*

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.

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.

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

