

Spring 2013

The Organic Sprout

MOFGA's Newsletter
for Organic Producers

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
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Sound and Sensible

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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 reproduce 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>.

