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Winter Storms Wreak Havoc on ICS

I remember back when I was still in grade school looking out the window and barely being able to see the house next door. My siblings and I would stand by the radio eagerly awaiting the school cancellations. Since I've had children of my own, this hasn't happened to much extent – until this year. We have come to realize that for the past eight or nine years, we've been quite spoiled with beautiful winters – a blessing which has come to an abrupt halt.

This winter, as many of our clients have found out, North Dakota has been hit with one blizzard after another. The nice part about the rough winter is that another generation of North Dakotans will

have memories of eagerly awaiting the school cancellation report. The bad part of this nasty weather is that most of ICS employees live either in surrounding small towns or on farms of their own; and with the excess snow comes the inability to leave their homes. We have three employees who live in town, just a few blocks away from the office, and you have probably called our office to find that these three are the only staff available.

We'd like to thank all of our clients for your continued patience with us, and for your understanding that we are doing everything possible to get you answers as soon as possible.

Changes at the ICS Office

Thanks to the many comments and suggestions we've received from clients, International Certification Services, Inc. has taken a close look at how we operate, and has decided on some restructuring which will greatly improve our efficiency.

The Customer Care Team:

Thanks to the many comments and suggestions we've received from clients, International Certification Services, Inc. has taken a close look at how we operate, and has decided on some restructuring which will greatly improve our efficiency.

Beginning soon, we will be breaking up our Customer Care Team into sub-teams: one for growers and one for non-

growers. The basic structure of these sub-teams will be very similar to what it is now, with each client having a Customer Care Specialist (CCS) as their main contact.

The difference will be that with two members on each team, both CCS's on that team will work closely with each other and will both be aware of the operations of each client associated with their team. Therefore, if your CCS is unavailable that day, the other CCS on the team will be better able to assist you.

Splitting the group into teams also allows for the CCS's to specialize in one particular area rather than have their focus split between both grower and

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Calendar Of Events

Medina Ag Days	Medina, ND (March 28)
All Things Organic	Chicago, IL (June 16-19)
DakotaFest	Mitchell, SD (August 18-20)
NPSAS Summer Symposium	Dickinson, ND (July 13-14)
Mon-Dak Ag Open	Williston, ND (August 4-6)
Expo East	Boston, MA (Sept 23-26)

ICS will be attending each of these events. Please contact us if you wish to meet with a representative.

Submissions

Letters to the editor are welcome. Please include complete contact information including your daytime phone number and signature. All letters are subject to printing in our newsletter, however submission does not guarantee printing. Letters may be edited and cannot be returned.

For information on submitting an article, or if you have any ideas on articles that you'd like to see in our newsletter, please contact Brandi Eissinger at 701-486-3578 or via email at brandi@ics-intl.com. Letters to the editor may be sent to this same address.

Feedback

ICS welcomes and encourages feedback on our FVO Requirements as well as the other programs we offer. We also encourage comments and suggestions on our newsletter and website. If there is anything else you'd like to see, please let us know and we'll do our best to get you what you need.

To submit your feedback, either contact your Customer Care Specialist, email info@ics-intl.com, or contact our office at 701-486-3578.

Changes at the ICS Office

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non-grower requirements. This will allow for them to better answer your questions.

We do recognize this change will affect some of our clients as they may have a change of CCS. We will be contacting each client whose CCS will change, beginning April 1st. Please know the entire Customer Care Team will be working closely together to make the change as smooth as possible; and your current CCS will be ensuring your new CCS understands your operation and your needs.

The Review Process:

As mentioned in our last issue of the Sustainable Times, ICS has recently contracted with more reviews as well as have added an additional full time reviewer.

The commitment from these reviewers will greatly increase our efficiency and turn around time.

Thank you for your continued patience and loyalty, and please know that we are doing everything within our power to make the entire certification process easier and more efficient for you.

Your comments and suggestions have been greatly appreciated and very important to us as we move forward. Please continue to send these to us. We do have a survey available on our website and given out during your inspection, however you do not need to complete this to give your suggestions or comments. Simply send an email to our Marketing Specialist (brandi@ics-intl.com). The entire Business Development Team will take action wherever and whenever possible.

Thank you for being a part of our family and we look forward to a great year with all of you!

Canada Voluntary Accreditation Program

International Certification Services, Inc. has been approved by the IOAS to certify operations to the IOAS Canada Voluntary Accreditation Program. This voluntary program allows us to inspect and certify your operation to the *Canada Organic Production Systems General Principles and Management Standards* and the *Organic Production Systems Permitted Substances List*.

Please note: This program is not the Canadian Organic Regime, and you will not be able to make any claims concerning the COR. Also, operators certified under this voluntary program may not use the Canadian organic logo or make reference to COR certification on any product until the regime is formally launched. Instead, this program is a precursor to the COR program, which will not be imple-

mented until June of 2009, and is intended to make the transition to the COR program simpler.

If you have any questions, or are interested in being certified to this program for 2009, please contact your Customer Care Specialist.

Country of Origin Labeling

The U.S. Dept. of Agriculture has issued the final regulation for the mandatory country of origin labeling (COOL) program required by the 2002 and 2008 farm bills. The full text of the final rule will be published in the Jan. 15, 2009 Federal Register. The rule becomes effective on March 16, 2009, 60 days after the date of publication.

The rule covers muscle cuts and ground beef, lamb, chicken, goat, and pork; wild and farm-raised fish and shellfish; perishable agricultural commodities (specifically fresh and frozen fruits and vegetables); macadamia nuts; pecans; ginseng, and peanuts. Commodities covered under COOL must be labeled at retail to indicate its country of origin. For fish and shellfish, the method of production—wild or farm-raised—must be specified. Commodities are excluded from mandatory COOL if the commodity is an ingredient in a processed food item. The definition of a processed food item remains unchanged from the Aug. 1, 2008, interim final rule.

Excluded from COOL labeling are items derived from a covered commodity that has undergone a physical or chemical change—such as cooking, curing, or smoking—or that has been combined with other covered commodities or other substantive food components such as chocolate, breadings, and tomato sauce.

Also exempt are food service establishments, such as restaurants, lunchrooms, cafeterias, food stands, bars, lounges, and similar enterprises.

The final rule outlines the requirements for labeling covered commodities and the recordkeeping requirements for retailers and suppliers. The law provides for penalties of up to \$1,000 per violation for both retailers and suppliers not complying with the law. The rule prescribes specific criteria that must be met for a covered commodity to bear a ³United States country of origin² declaration. In addition, the rule also contains provisions for labeling covered commodities of foreign origin, meat products from multiple ori-

gins, ground meat products, as well as commingled covered commodities.

The USDA plans to make funding available to accelerate and expand training of state cooperator employees, initiate development of an automated review tracking system, conduct a retailer survey, conduct audits of the retail supply chain, and continue conducting education and outreach activities.

Currently, the USDA has cooperative agreements with 42 states to conduct retail surveillance reviews. The USDA will conduct the retail reviews in the states not covered by a cooperative agreement and perform the supply chain audits.

More info at:

<http://www.ams.usda.gov/AMSV1.0/ams.fetchTemplateData.do?template=TemplateN&navID=FinalRule&rightNav1=FinalRule&topNav=&leftNav=CommodityAreas&page=COOLRuleandRegulations&resultType=&acct=cntryoforgnbl>

On the Propagation of Bad Ideas

By Fred Kirschenmann

There is an ecology of bad ideas, just as there is an ecology of weeds, and it is characteristic of the system that basic error propagates itself.

When you have an effective enough technology so that you can really act upon your epistemological errors and can create havoc in the world in which you live, then the errors become lethal.

– British anthropologist and author Gregory Bateson, 1969

The cacophony of crises to which we have been subjected recently has given new meaning to the term sustainability as it relates to our food and agriculture enterprises. Just a few short months ago, farmers were planning their next season on the assumption that they would be selling corn for \$7 a bushel and that the increasing demand for corn might push prices even higher. So landowners began increasing rental rates, equipment and fertilizer prices spiraled upward, and seed became more expensive – all of which began to eat into the projected “gravy train” – the “golden era” many had predicted for farmers.

All of these development left farmers with more expenses and greater risks. In a September 2007 presentation at Grinnell College, Ohio State University economist Carl Zulauf said that farmers’ current input costs (not including increased land rent) already had gone up 22 percent when compared with average input costs over a five-year period from 2001 to 2006.

Farmers have absorbed these higher costs and now dry corn is selling back in the \$3 per bushel range. In the Northern Plains where cold weather has prevented the corn from drying down in the field, farmers are harvesting corn at 25 percent moisture and local elevators are only paying \$2.20 per bushel for the wet corn. The high cost of propane to dry the corn leaves them little choice.

I doubt that anyone can argue that this scenario is “sustainable” for farmers.

Meanwhile, food prices have increased around the world, creating severe hunger problems in some regions where people spend more than 80 percent of their income on food. The result has been a “food crisis,” and in many circles farmers were being blamed for it. Farmers may be part of the problem but they are hardly the cause of it.

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OMRI Dropped Products

Please note: the products listed here have been dropped by the Organic Materials Review Institute. They may or may not be allowed in organic production. To protect your organic status, please contact your CCS if you are using any of these products. Also, please remember to have **all** inputs reviewed by ICS prior to use.

- ACS Activated Carbon Solution—BioScientific, Inc. (dropped 3/12/2009)
- Agrastim™—Bioagra (dropped 3/1/2009)
- AgriMagic®—St. Andrews Turf Products, LLC (dropped 3/1/2009)
- Agroneem®—Agro Logistic Systems, Inc (dropped 1/5/2009)
- Balance EFA™—Profit Pro (dropped as of 2/20/2009)
- Balance LEB™—Profit Pro (dropped as of 2/20/2009)
- Balance ME™—Profit Pro (dropped as of 2/20/2009)
- Balance MRE™—Profit Pro (dropped as of 2/20/2009)
- Balance OME™—Profit Pro (dropped as of 2/20/2009)
- Big Bear Hills Black Peat—Big Bear Hills, Inc. (dropped 3/1/2009)

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On the Propagation of Bad Ideas (cont.)

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The underlying circumstance that often leads to such crises was explained by noted British anthropologist in a paper that he presented at a conference in 1969. In his paper, "Pathologies of Epistemology," he argued that we can never *know* anything absolutely – that we always harbor many false propositions, which can be false even when they seem to work and we all share them. Accordingly, we easily can become committed to such false propositions and find it very hard to let go of them.

Bateson further observed that when such false propositions are combined with powerful technologies, the result sometimes can lead to "lethal" errors. These observations are particularly relevant to understanding the core cause of our current crises.

The central propositions that have guided our thinking for several centuries are that:

- humans are separate from nature;
- we are in a struggle against nature and must therefore invent technologies that enable us to exercise control over nature;
- maximum efficient production, short-term monetary return and unlimited growth are the most effective means by which we can accumulate wealth and ensure security; and the most efficient ways we can achieve those goals are through specialization, simplification and economies of scale.

While those propositions seemed rational at the time they were crafted, and they worked relatively well under certain conditions, it may be time to reexamine them for potential systemic errors. The melt-down in many parts of our economic system may well be due to the facts that these propositions left us with a brittle system that is not very resilient in the face of shocks and disturbances, and that they have led us to deplete our natural resources to a point which now threatens the carrying capacity of the planet.

Consequently, it may be wise for us to follow Bateson's advice and examine the epistemological ideas which underlay our current paradigm. We need to explore more sustainable propositions that are grounded in ecological economics, resilient production, long-term monetary returns, and a food and agriculture system that is redesigned to mimic nature and is more self-renewing and self-regulating.

If we perpetuate epistemological errors and use our powerful technologies to reinforce them, we may find that our current crises are only the beginning. And if we persist in this epistemological pathology we may create even more "havoc in the world in which [we] live." – *Frederick L. Kirschenmann*

This article has been copied in its entirety from the Winter 2008 Leopold letter, published by the Leopold Center for Sustainable Agriculture.

Ames, Iowa 50011, (515) 294-3711

URL: www.leopold.iastate.edu

New Certifications

ICS welcomes the following organizations to our family of certified clients. We're proud to have you with us.

NOP Certifications:

Zoetica – Processor/Manufacturer
 Bonnie Wideman – Family Farm
 MLS Sales – Processor/Manufacturer
 Day Break Farms – Family Farm
 Sylvite Transportation – Contract Service
 Mark Ostrem – Family Farm

Cost Share Program

Reminder to all ICS Clients:

Please contact your State Department of Agriculture regarding the Cost Share Program. This program provides reimbursement of up to \$500 or \$750 (depending upon your state) for certification costs.

Your State Department of Ag can provide more information as well as the application needed.

If you need a copy of your certificate, or a statement of fees paid to ICS, please contact your Customer Care Specialist.

Fertilizer Notice

Press Release from National Organic Program
February 20, 2009

This notice is to inform you that the National Organic Program (NOP) is no longer confident that the following liquid fertilizer products can be shown to be compliant with the NOP regulations: Marizyme™ and Agrolizer™. Both of these products were manufactured by Port Organic, Ltd., which is not operating at the present time.

The USDA Office of Inspector General (OIG) is currently investigating Port Organic, Ltd. Your clients should be aware that continued use of Marizyme™ and Agrolizer™ and products made from these materials puts their operations at considerable risk. You are advised to notify your clients of this immediately.

Further, the NOP cautions vigilance in the approval of all liquid fertilizer products and other inputs. We are taking the following steps to support certifying agents, with whom final responsibility for approval of all organic inputs remains. These steps are effective for all ACAs—not just domestically-operating agents—as well as all NOP-certified operations globally.

- Effective with this notice, continued use of the products Marizyme™ and Agrolizer™ without the ability to prove they are in full compliance (see approval criteria below) with the NOP standards could jeopardize the organic status of operations, including land and products, once the outcome of the OIG investigation is concluded.
- By October 1, 2009, approval of all high nitrogen liquid fertilizers (nitrogen analysis greater than 3 percent) must be accompanied by documentation that demonstrates their compliance with the NOP regulations, based upon a 3rd party inspection that meets the criteria below. If such documentation is not provided, ACAs must immediately rescind approval for the use of these materials by certified organic operations.
- By October 1, 2009, NOP will require all 3rd party reviewers to implement a system of audit and inspection for branded products they deem compliant with the NOP regulations as a condition of recognition as a 3rd party reviewer by the NOP. Inspections must include but not be limited to high risk inputs such as liquid fertilizers and other inputs where synthetic substitutes are readily available and have the potential to be concealed.

- NOP will also require all 3rd party reviewers to undergo audits by NOP as a condition of ongoing recognition as a 3rd party reviewer for materials by the NOP.
- NOP will focus increased scrutiny on how inputs are approved for use by certified organic operations during accreditation audits of ACAs conducted beginning in 2009, beginning with an emphasis on liquid nitrogen fertilizers.

Approval Criteria for Fertilizer Manufacturers:

No later than October 1, fertilizer manufacturers must show the following documentation from a 3rd party evaluation:

- No evidence of fraud in formulation, including verifying the presence of all necessary infrastructure to produce the approved finished product. This includes: dry and liquid storage, all necessary conveyance (forklifts, trucks, piping, etc), finished product storage, and both the ingredient and finished product transportation infrastructure.
- Verification of no synthetic nitrogen equipment, tanks, or supplies within 100 yards of the facility that produces the organic approved inputs at any time of the year; and
- Verification that a successful audit was conducted comparing incoming materials with outgoing finished products and complete, detailed explanations for any deviations.

The NOP also takes this opportunity to remind producers and certifying agents of their responsibilities under the NOP soil fertility and crop nutrient management practice standard §205.203:

- Producers must select and implement practices to maintain and improve the condition of soil and minimize soil erosion.
- Further, producers must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.
- Finally, producers must manage plant and animal materials to maintain or improve soil organic matter content. The management of plant and animal materials must be done in a manner that does not contribute to contamination of crops, soil or water.

First Ever Organic Processing Workshop Set in North Dakota

MEDINA, N.D. — North Dakota food processors may be surprised to discover organic processing isn't all that different from conventional processing and it can be a profitable venture in a tough economy. These are two big reasons why a national workshop on the ins and outs of organic processing is being offered this spring in Medina, N.D.

About 35 North Dakota processors — including the North Dakota Mill — are already engaged in organic processing. A North Dakota organization called the Foundation for Agricultural & Rural Resources Management and Sustainability (FARRMS) is hoping to increase the number of organic processors by hosting the first processor workshop ever presented by the International Organic Inspector Association (IOIA).

Based in Medina, FARRMS supports sustainable agriculture through educational opportunities. IOIA is a member-based organization dedicated to ensuring organic products really are organic.

Until now IOIA has primarily provided organic inspector training. The two-day training for processors is set for April 30 and May 1 in Medina. It's intended for those engaged in conventional processing and those recently certified for organic processing. Participants from throughout the region as well as Canada are expected to attend.

"We know there are many misconceptions about organic processing," says FARRMS project coordinator Britt Jacobson. "Conventional processors often think they need to build new facilities or that they can't use current equipment in organic processing, but that's not true. There are ways you can do organic processing in a conventional facility."

Another misconception is that organic processing requires an extraordinary amount of paper work. "But processors have to do things a lot less differently than they think," says IOIA executive director Margaret Scoles. "Any processor with good documentation and quality control probably has all the records they need."

Scoles is one of two IOIA inspectors scheduled to present the Medina workshop. The IOIA executive director has been an organic inspector more than 20 years, she holds a bachelor's degree in agriculture, and raises cattle with her husband in Montana.

IOIA has been training organic inspectors worldwide since the mid 1990s. All organic processors — whether they are milling flour or butchering certified organic beef — must be inspected once a year. Inspectors, however, are forbidden from giving those being inspected advice on how to improve their operations. Large operations might hire an organic consultant for start-up or maintenance advice. The aim of the workshop is to make this information affordable for smaller operators.

There's no doubt, USDA's National Organic Program handling and labeling standards are stringent, but the extra effort required to meet those standards does pay off. In October 2008, despite the economic downturn, organic sales showed a growth rate of 11.2 percent.

Participation in the organic processing workshop is limited to 23 and processors must apply for acceptance. The cost is \$500 per person. Some scholarship funds are available. For more information or application forms, visit www.farrms.org or call 701-486-3569.

Founded in 2000, FARRMS is a nonprofit foundation based in Medina, N.D. FARRMS supports sustainable agriculture through educational opportunities such as informal workshops, Organic Farming 101 course, and Farm Business Management scholarships for organic farmers. FARRMS also coordinates the Grants to Grow program for producers adding organic and sustainable enterprises on their farms.





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Organic farming has been shown to provide major benefits for wildlife and the wider environment. The best that can be said about genetically engineered crops is that they will now be monitored to see how much damage they cause. (Prince Charles)

OMRI Dropped Products (cont.)

(Continued from page 4)

- Biomin® Iron 2-0-0 – JH Biotech, Inc. (dropped 2/27/2009)
- Catalyst Fish Meal – The Catalyst Product Group (dropped as of 2/20/2009)
- Down To Earth Bat Guano 0-7-0 – Down To Earth Distributors, Inc. (dropped 3/1/2009)
- Down To Earth Coconut Husk Chips – Down To Earth Distributors, Inc (dropped 3/1/2009)
- Dried Poultry Litter – Big Red Farms (dropped 2/23/2009)
- GC-3™ – JH Biotech, Inc. (dropped 3/3/2009)
- GC-Mite™ – JH Biotech, Inc. (dropped 3/3/2009)
- HumaPhos™ – Midwestern Bio-Ag, Inc. (dropped 3/1/2009)
- Jersey Greensand – The Fertrell® Company (dropped as of 2/20/2009)
- Kelp Sea Life™ – Organic Seaweed & Fish Emulsion Natural Farmers (dropped 1/26/2009)
- NAP Organic Vinegar – Northwest Agricultural Products™ Inc. (dropped 3/1/2009)
- Natural Gro 10-1-4 – St. Andrews Turf Products, LLC (dropped 3/1/2009)
- Natural Gro™ 4-4-4 – St. Andrews Turf Products, LLC (dropped 3/1/2009)
- Organic Reflections BLOOM – Talaria Enterprises (dropped 3/1/2009)
- Organic Reflections GROW – Talaria Enterprises (dropped 3/1/2009)
- Perfectly Natural™ Winter-Prep Lawn Fertilizer 5-1-14 – Perfectly Natural Solutions, Inc. (dropped 3/1/2009)
- RainGrow™ Compost Tea – Bioz Agri Products, Inc. (dropped 3/1/2009)
- RainGrow™ Organic Fertilizer 1-4-3 – Bioz Agri Products, Inc. (dropped 3/1/2009)
- Serenade® A Wettable Powder Biofungicide – AgraQuest, Inc. (dropped 3/1/2009)
- Sunleaves Indonesian Bat Guano – Sunleaves Garden (dropped 3/1/2009)
- Zinc Coposil™ Sulfur 15-30 Dust – Agro Valley Enterprises, Inc. (dropped 3/1/2009)

The following have been found to demonstrate a non-compliance with the NOP Rule and are therefore prohibited:

- Alaska® Fish Fertilizer 5-1-1 – Lilly Miller Brands (Prohibited as of 2/20/2009)
- Marizyme 4-2-2 EF – Port Organic Products (Prohibited as of 2/20/2009)
- Agrolizer™ – AgroMar, Inc (Prohibited 2/20/2009)
- CBM Compost – California Bio-Mass (Prohibited 1/5/2009)