



April 2, 2007

Issue 2

2007 APPLICATION DEADLINE APPROACHING

If you missed the March 15th deadline to submit your application, please be aware that the application fee is now \$200. All applications must be post-marked no later than May 31. Please be diligent about proofreading your application and submitting all forms. Inspections will not be scheduled until all

paper work has been accurately submitted along with the application fee.

If you have questions or need assistance, you may contact Mary Nieland at 515-281-7656. Forms may also be obtained online at www.agriculture.state.ia.us.

MARK YOUR CALENDAR:

- May 31 FINAL submittal date for applications

OUR INPUT REVIEW PROCESS

In an effort to keep up with the ever-changing list of allowed and prohibited products, we are making some changes to our product review process. By stream-lining our process we hope to be able to provide quicker responses to your product questions. Although this takes time to implement, we believe that both our staff and our customers will reap the benefits. You can help by taking some preliminary steps before submitting labels for review. First, gather all the pertinent information such as the correct product name, the name of the manufacturer or distributor of the product and a list of

all product ingredients. With this information in hand, review the National List of Allowed and Prohibited Materials (NOP Regulations sections 205.600-205.606) as applicable. If you are able to determine that the products would not be allowed for use, there is no need to submit the label as we utilize the same lists. If you cannot determine the acceptability, you may submit the label for review. Please allow ample time for product review and staff response. Do not incorporate any questionable products into your organic system until they have been approved by our office.

SPECIAL POINTS OF INTEREST:

- Iowa processor exports to Japan
- Questions answered on planting organic seeds
- Inspection readiness

OUR MAILING ADDRESS

When mailing information to our office, in addition to addressing your envelope to the Iowa Department of Agriculture, you must also put "Organic Program" on it to make sure we receive it in a timely manner.

SAVE TIME, BE PREPARED

Inspections with our organic inspectors will occur only after all proper paperwork has been successfully submitted. An inspector will be contacting you to set up an appointment. By being well organized and prepared, you can save yourself

and us a lot of time and avoid unnecessary delays in receiving your 2007 certificates. The following checklist should help you be ready for your inspection by having all supporting documents ready at the time of the visit.

CROP INSPECTIONS

Be sure to have ready:

- Seed Invoices, Seed Tags
- Documentation of manure, fertilizer & other input applications
- Equipment Cleaning documentation
- Field activity log
- Water and/or soil test results
- If you have been previously certified, have crop storage logs, sales documentation, clean transportation documentation, records of buffer harvest disposition & copies of ATCs/TCs

LIVESTOCK INSPECTIONS

Be sure to have ready:

- Transactions Certificates for organic feed purchased from other farmers
- Invoices for organic feed purchased from certified feed mills
- Transaction Certificates for organic livestock purchased
- Herd or flock health records
- Hauling records
- Sales documentation

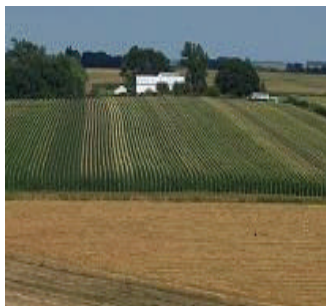
THINKING OF A DIFFERENT VENUE? HOW ABOUT JAPAN?

We applaud the efforts and hard work of one Iowa processor certified by IDALS that undertook the challenges of going global. Tami Garman of Happle Gourmet Foods, LLC knows firsthand the trials and tribulations of the world of export. Two thousand certified organic apple, blueberry and cherry pies were shipped to Japan last December. She attributes much of the success to partnering with the right firm. Macsei Industries Corporation of Los Angeles was instrumental in making product connections and the marketing aspect. Japan is very methodical in verifying all products used. Pictures were taken of every ingredient label as well as the equipment used and the kitchen in which the pies were prepared. Tami advises that flow sheets and diligent tracking of all incoming and outgoing products is a necessity. Even though the exchange rate is currently quite favorable, it may take some time to reap the expected financial gain.

Japan has a compliance statement that must be met; in addition to meeting the organic standards established by the United States. Japan's compliance statement specifies that any products covered under the export certificate (TM-11) must not include any of the following ingredients: Alkali-extracted humic acid, lignin sulfonate or potassium bicarbonate. IDALS is listed by the USDA/NOP as an Accredited Certifying Agent approved to issue TM-11 Export Certificates under an export arrangement to Japan. If you are considering entering into such an agreement and would like us to assist you with this, please allow yourself and us ample time to complete the necessary documentation as this is a crucial part of the process. More information can be obtained on the National Organic Program website at: <http://www.ams.usda.gov/nop/NOP/Trade.html> or you may contact Tammy Stotts at tammy.stotts@idals.state.ia.us or 515-281-7657.

Congratulations to Happle Gourmet Foods, LLC!

DO I HAVE TO PLANT ORGANIC SEED?



This is a question often asked by organic crop producers. The answer is, “Yes, you must plant ALL organic seeds, but there are a few exceptions.” NOP §205.204 (a) (1) gives the exception that is most often applicable. It states

“Nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available.”

Lets start with the easy part. The exception is to allow the planting of UNTREATED Non-GMO seed. Seed treated with fungicides such as Maxim, Apron, Captan, etc (the pink stuff or other bright color on seed) is always prohibited for organic production and for production in transition to organic. Any land that has this treated seed planted on it will not be eligible for organic certification for three years. Under NO circumstance will planting the treated seed be allowed. Do not be confused, because some certifiers prior to the NOP in 2002 did allow treated seed as a last resort. **This is no longer acceptable.**

So, untreated and non-GMO seed is allowed when “an equivalent organically produced variety is not commercially available.” To illustrate how this is interpreted, several questions that have been asked by producers are listed below followed with the answer to the question.

Can I ...

plant untreated seed because it yields 148 bu/acre and organic yields 143 bu/acre? No, the yields are very comparable. It sounds like you have found an equivalent organically produced variety.

continue planting untreated seed because in last year's test plot of five organic varieties suited for my farm planted side-by-side with untreated varieties, the closest yield was 148 vs. 98? Yes, this is a huge yield difference. The farmer should provide test plot data and continue to try new organic seed that is released for his area.

use untreated peaches and cream sweet corn because there is no organic peaches and cream sweet corn and the people at the farmers' market will only buy peaches and cream? Yes, please have documentation available showing no availability and customer preferences.

buy untreated bush beans because I will save 50% on my seed bill? – No, cost is not mentioned as an exception.

buy untreated seed from my neighbor buddy, Bill, because that's all he sells and I have bought seed from him for the past 30 years? – No, there are other seed dealers that do sell organic seed. Maybe Bill will consider handling organic seed too.

buy untreated seed because the closest dealer for organic seed is 150 miles away? – No, organic seed is still available to you. If you don't want to drive that far, there are delivery services that make it commercially available.

plant my transitional oats that are in my bin on my organic land, rather than buy organic seed oats? No, transitional oats are not organic seed.

plant non-organic rye because I am just using it as a cover crop? No, all seeds planted on organic land need to be organic whether you harvest them or not.

plant untreated leaf-hopper resistant alfalfa seed, because no organic alfalfa seed offers the leaf-hopper resistant trait? Yes, as long as this trait is not from a GMO, and you provide documentation that it is not available.

plant untreated HBI-673 food-grade soybeans because the contract I signed requires HBI-673 food-grade soybeans, and this variety is not available as organic? Yes, have contract available for the inspector to view.

wash the seed treatment off to make my treated seed into untreated seed? No.

plant 80 acres of untreated popcorn seed because organic popcorn seed is only available in 5 oz packets? Yes.

plant untreated seed because all the seed companies said they sold out of the organic seed in March and I didn't order until the end of April? Yes, next year try to order the seed earlier, and get documentation of this shortage from all the seed companies.

Hopefully these examples will help you understand what is meant by the rule. Most of the seed that is being planted on organic land is certified organic, and the producers have been able to find seed varieties that perform very well on their farm. We expect producers to follow the intent of the regulation, and to not abuse this exception that is necessary in certain situations.

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HELP ON THE WAY?

Legislative sessions always seem busier and more hectic when you're hoping for a particular outcome. The Department's Organic Certification Program has grown tremendously over the past eight years serving only 30 clients in our first year to over 250 clients last year! It has always been our goal to provide prompt and professional certification services. With the rapid growth that we've experienced we've been forced to become more and more efficient. This is a good thing. However, there are

limitations to such efficiencies. As you know, there are times on the farm when you just need more help regardless of how efficient you've become. That's where we've been over the past year. While the number of clients we serve has dramatically increased, our staff number has not. The good news is that our request for additional staff has been heard. We will know by the end of the legislative session if in fact the position is authorized and funded. If so we hope to serve you even better!

AT YOUR FINGERTIPS

Monitor the markets from your own home and at your convenience. Not all technological advances are welcome; however one you can easily embrace whole-heartedly is the ease of getting the latest market news. There are many sites that offer market information. One such

site offering current organic market information is the USDA's Agricultural Marketing Service. The Upper Midwest Organic Price Report is offered on a bi-weekly basis and can be obtained by going to: http://www.ams.usda.gov/mnreports/nw_gr113.txt.

PLEASE BE THOROUGH

Applications for organic certification are being received in our office on a daily basis; however, a number of the applications are being submitted with incomplete data and/or missing pages.

We handle a lot of paper and if your application is not complete, it forces us to handle your application multiple times until it is completed. We are on a seasonal timeline, much like you are, and staying on track is very important in getting certificates out to you in a timely manner.

When your application packet arrives, it is date-stamped, entered into the database, and reviewed to make sure all of the necessary documents are included and sufficiently completed. If you have already submitted your application and it is not complete, your application will be placed on hold and we will send you a letter requesting additional

information. It's very important that you respond promptly to our request. Your cooperation and timely attention are important to expedite the application process.

If you haven't yet submitted your application, please review the instructions and the application documents thoroughly before sending it in. In addition, we suggest you make a copy of your entire packet for your reference. We're counting on you to make your application legible, accurate and absolutely complete. By spending more time completing paper work prior to submittal, you will save yourself and our staff both time and energy. If you have a question pertaining to the application, please feel free to give us a call.

Thank you for your cooperation.