INTROSPECTION

INSPECTING THE INSPECTION PROCESS

By Rupert Jannasch

The organic certification system came under fire recently when an inspector, Mischa Popoff, claimed that random testing was the only sure way to guarantee the integrity of organic products. This proposal would be costly and hopelessly confusing, but it helps point out that current inspection methods emphasizing documents and paper trails require a general overhaul.

Organic production methods are considered a process and not a set of outcomes. Organic standards are designed to prevent contamination of food products, but they are not meant to guarantee a product is free of pesticides, antibiotics or residues of other contaminants. Testing is deliberately avoided when deciding compliance to organic standards because of the impossibility of determining what substances to test for and the acceptable levels of each.

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Similarly, HACCP (Hazard Analysis Critical Control Points) procedures are based on the need to improve product quality and safety through practice, with a decreased reliance on end product testing. These procedures are becoming widespread on farms and in food processing establishments.

Naturally, exceptions exist where testing is warranted. Testing for GMOs is a priority because the integrity of the organic food supply is at stake. Regular water tests are prudent given its widespread use in production and food processing. Even residue tests for pesticides serve a purpose when organic and conventional production co-exist on the same farm. The key is that the testing is not random but planned.

Inspector Popoff appears to believe that one test is enough to determine organic status (*Western Producer*, Nov. 20, 2007). What should be tested for? Glyphosate, nitrates or heavy metals? Imagine sampling near the relatively narrow buffer strips existing between some organic and conventional crops. Residue testing would open a huge can of worms and leave the entire industry in turmoil.

Changes in the process

Problems do exist with current inspection procedures despite increased regulation of the industry. More processing, more trade and longer supply chains mean higher financial stakes and greater legal liability. Examining lengthy audit trails takes precedence over verifying the biological processes that support organic production in the first place. Inspection is no longer about growing, but about record keeping.

Most farm inspections are squeezed into a fairly short time period, often in the peak growing season between late June and early August. Farmers are very busy and the inspectors usually have a gruelling work schedule. The inspection visits can be hurried. And because the pay for inspection work is extremely modest, the profession does not attract enough qualified individuals who stay in the business for the long-term. As it stands now, the inspector's role carries far too little weight in certification schemes.

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Inspection visits have changed from two-way exchanges of information to a one-way barrage of questions. Confidentiality agreements mean inspectors are discouraged from offering production tips to farmers. This is frustrating because not all information is proprietary, and secrecy does not help promote organic farming.

Several years ago, inspectors switched from writing narrative reports to completing checklists. There was widespread agreement that checklists lead to greater consistency in reporting and they make the work easier for inspectors. The large number of topics that can be addressed by a checklist system means the legal liability of the inspector and certifier are more likely to be covered. As a certified organic grower, however, I believe the checklist can be a detriment to understanding fundamental production processes on the farm.

Focus on forms

Filling out lengthy forms can be a distraction from more thorough questioning. For example, in order to recognize potential hitches for producing a given crop, the inspector should understand the conventional and organic production methods used to produce it. If conventional greenhouse tomatoes are prone to mildew, then the inspector needs to ask how the organic grower deals with the problem. Simply asking whether the grower has any pest or disease problems is not good enough. In all likelihood, however, a question about mildew and tomatoes will not be included on the checklist. Quite possibly, if prohibited substances were used to control the mildew, over-reliance on the checklist for questioning would fail to reveal information crucial to the certification ruling.

Does the average inspector have the skills and knowledge to formulate the pertinent questions? Understandably, the declining farm population and decreased enrolment in agricultural colleges means some inspectors lack the necessary background in agronomy or animal husbandry. The International Organic Inspectors Association does an excellent job teaching inspectors the rudiments of their work, but there is a limit to what an individual can learn about farming during a four-day course.

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Another necessary skill is the ability to quickly construct nutrient balances. These are needed to determine whether an operation is relatively self-sufficient in feed and/or fertilizer. In other words, does the declared farm production match the organic sales and is such production possible with the nutrients available on farm. Is any discrepancy accounted for by declared off-farm inputs? Sometimes livestock operations demand this type of accounting, but all too often it is overlooked.

Extending the season

Improving inspection methods is no easy matter, especially if costs are to remain reasonable. A more practical option than residue testing would be to conduct farm inspections over a longer season. This system has been used by the UK's Soil Association, and it has several advantages.

The inspection visit becomes less rushed, as inspectors would have no reason to cram vast numbers of farm visits into a limited schedule. Having some inspections in non-peak work periods like the fall might enable experienced farmers to work as inspectors. Furthermore, an established farm regularly inspected in July, for example, would do well to have a visit in October another year. Different aspects of the operation, such as on-farm storage, would then receive scrutiny.

A more balanced schedule should mean that certifiers could retain fewer and better trained inspectors. Ultimately, of course, the integrity of the certification process depends on the certifier's willingness to enforce the organic standards. Paper trails, impressive documents and a corporate image may give the appearance of credibility, but they risk creating a smokescreen for shoddy certification decisions. Unless certification bodies encourage inspectors to do more thorough work and then treat their opinions with some deference, organic certification stands to become a meaningless burden.

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