

How Biodiversity Conservation is Being Implemented in Organic Agriculture

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This past winter, Wild Farm Alliance and IOIA collaborated on surveys and interviews of over 50 inspectors and certification reviewers, as part of a joint project to integrate biodiversity and natural resources conservation as a fundamental principle in organic inspections. This project reflects on current and future natural resource materials in the NOP Handbook.

Within the last few years, the NOP has added the natural resources standard to their audit checklists used to accredit certification agencies, and has added a natural resources section to their model Organic System Plan (OSP) for crops and livestock. At the spring 2014 NOSB meeting, the NOP predicted that draft Biodiversity and Natural Resources Conservation Guidance will be published this fall and finalized next year. The NOP is also currently working with USDA Natural Resources Conservation Service (NRCS) to make it easier for transitioning farmers enrolled in NRCS' Conservation Activity Plan 138 to use that paperwork for part of the Organic System Plan.

Highlights of Survey

Survey Question: Do you think organic operators on average understand what is meant by Biodiversity Conservation as part of compliance for the organic regulation?

According to those who responded, an average of only about 60% of organic farmers understand biodiversity conservation as part of compliance for their certification. More on this topic revealed a range of opinions.

Some reported farmers understand, and that makes their job easy. Responders said that in general, a good farmer will naturally do the right things, because that will help them maximize profits and make their operation more sustainable. With a somewhat different twist on this issue, some said farmers limit their efforts for promoting biodiversity only as far as it does not affect their farming operations and profits. Some thought mostly the farmers who are philosophically aligned and not in it for higher prices are addressing conservation. Some were concerned that farmers are challenged with an unclear direction on how to translate what they do into their OSP.

Answers also depended on the location, size and previous assistance from USDA Natural Resources Conservation Service (NRCS). A few said that much of the landscapes where they work are naturally diverse and so farmers easily comply. Another repeated this assessment specifically about farmers in northeastern states, and compared them with those in Midwestern landscapes where it was harder for farmers to comply because much of the diversity was lost in the past. Others said that it was a question of size and that most small farmers address conservation while most industrial sized farms do not. While farmers' interactions with NRCS also made a difference, it was stated that even some of those farmers might still not really understand conservation because sometimes NRCS creates the plan for them.

For those farmers that don't understand or comply with the biodiversity and natural resources regulations, it was reported some are unsure, some have problems with semantics—for instance 'riparian' versus 'creekside,' some don't read all the regulations, some do not know how to answer the questions, and some have an OSP that doesn't address these enough or at all. The rest don't think biodiversity conservation is part of the rule.

Survey Question: Is Biodiversity Conservation integrated into the organic inspection/certification review?

While 79% of those who responded said biodiversity conservation is integrated into the organic inspection and/or certification review process, only 55% integrate it as foundational principle of organic agriculture.

Of those who responded positively, a few said it was because the certifier addresses it well in their OSP, making it really easy to do. If there is a problem, they have the client develop a plan and then submit it. Sometimes they make it mandatory that the client gets help from NRCS or the Resource Conservation District.

Some said it only comes up as related to pollinating and beneficial insect habitat, or only during the site walk. Others said it may be discussed, but not the degree it deserves. Some try to integrate it but find it challenging, and are not sure what the minimum requirements are. Some said there are a couple of questions but it is not an underlying theme, and the inspection tends to be limited in dialogue—it is included, but barely addressed or enforced by inspectors and certifiers.

For those who said it was not discussed well, or at all, they offered several reasons. One is that they felt there are so many bigger issues, such as pesticide usage, that takes up 99% of the time with 1% left is for everything else.

Another reason is that certifiers think it is too much paperwork to change their systems and since they have a lot of leeway on how they interpret the regulations, that they don't address biodiversity conservation better than they do.

Further reasons pointed to OSPs that only have checkboxes, which means the inspector only has to verify what they checked, whereas some certifiers require a narrative, which then makes for a much richer discussion/verification process.

A final reason has to do with actual and assumed expertise. Some said that there are a lot of people in the certification business who are underqualified and need further training, and it would help if they would visit natural landscapes near farms so they can learn to recognize high quality natural areas on the farm. Some mentioned that there are inspectors who have been in the business awhile and don't think they need to learn more. Then there are some that come initially from industrial agriculture and don't care about biodiversity conservation.

Survey Question: Do you have a basic understanding of Biodiversity Conservation, but need more advanced information?

All respondents reported a basic understanding of biodiversity conservation, and 40% of those rated themselves as having a deep understanding. 94% would like more about non-compliances and how NRCS and other conservation programs work. Some would like to learn how farmers can prevent and fix conservation problems, or what are a wetland and other natural resource features. Some would like to look at the whole system - inputs flows, carbon/nitrogen balance, etc. Others suggested that advanced IOIA 200 and 300 series makes sense, especially since there are new expectations by the accreditation checklist and upcoming Guidance.

Insights Gained During Interviews

When speaking to certification personnel on the phone, some mentioned roadblocks and others suggested ways in which to integrate biodiversity and natural resources conservation more thoroughly into organic inspections.

Technical Assistance – Is it a Roadblock or an Opportunity?

During the interviews, the issue of how much inspectors share information when they are not allowed to consult came up over and over. For some it was a case of not knowing enough to share information, but for many others it seemed easier not to say anything. After all, an inspector's job is to verify the OSP and with some OSPs, very few questions are geared to natural resources. According to inspector Ib Hagsten, Chair of IOIA, an inspector who finds a noncompliance cannot specifically tell a producer what to do to get back in compliance—because that is consulting. But they can tell a story that helps the producer understand, or they mention an article they heard about, or share a statement someone made about a similar issue and suggest that the producer may want to check into it—this is not consulting. Interviewing Ib inspired him to write an excellent article about technical assistance and natural resources in IOIA's Winter 2014 issue under "Notes from the Chair."

Getting on the Same Page – Certification Agencies and the NOP Can Help

Inspectors have seen how once a certifier learns that their competitors are addressing an issue, it can empower their agencies to do a better job than they did in the past. They say certifiers would like to think that they are addressing what is considered the norm throughout the organic certification world. Further, these inspectors suggested that the best place and time for a discussion of this type would be at trainings given or supported by the Accredited Certifiers Association (ACA) and USDA after the Biodiversity and Natural Resources Conservation Guidance comes out. The training should drive home the need for proper OSPs, educated inspectors and consistent and thorough coverage. Several certification personnel felt it will be very important for the gray areas to be addressed; otherwise the certification agencies won't put in the energy needed to making changes. For instance, it was thought that the NOP will need to spell out how an inspector weighs the mandate for natural resources when examining the extenuating circumstances related to a farm's barren landscape devoid of all biodiversity but the annual crop and its pests.

New Biodiversity Conservation Trainings and Support Materials as a Result

IOIA has been teaching about conservation in organic inspections almost since the NOP regulations came out. In the last three years, Tony Fleming's IOIA articles—*Fumbling Towards*

Complexity—continues on this theme, and helps to parse out many gray areas, while calling into question others. His latest piece in the Spring 2014 issue offers a matrix as a way to keep track of the natural resource issues.

IOIA embarked with Wild Farm Alliance and our team (Harriet Behar, Barry Flamm, and Lynn Coody) on the assessment of biodiversity and natural resources conservation to ultimately offer better trainings to organic inspectors, so that they are well prepared, more efficient and know how to inspect to NOP requirements with confidence. As mentioned, almost all certification personnel would like more information. To that end, we have collaborated on a new set of powerpoint slides and handouts for the Basic Training. These new materials cover biodiversity not just as it relates to natural resources (205.200) but also in many of the other regulations (205.203, 205.204, 205.205, 205.206, 205.238, 205.239, and 205.240). Once the Biodiversity and Natural Resources Conservation Guidance is finalized, these materials will be updated.

For those certification personnel who want advanced information, IOIA is offering a training titled *Natural Resource Assessment on Organic Farms* on November 13, 2014, given by Garry Lean and myself.

In the interest of addressing the need for farmer education, Wild Farm Alliance will be making presentations at sustainable agriculture conferences in many parts of the country this coming winter. We are also updating our Biodiversity Conservation materials for organic farmers (<http://wildfarmalliance.org/resources/BD%20Guide%20Organic%20Farmers%20.pdf>) and certifiers (<http://wildfarmalliance.org/resources/BD%20Guide%20Org%20Certi.pdf>), the latter of which is shared at IOIA's basic trainings. New critical issues related to the NOP regulations, food safety and climate change are being addressed, and relevant NRSC resources are included so that biodiversity and natural resources conservation principles continue to be a fundamental aspect of organic certification.