Washington Visit Raises NAICC Awareness

If a journey of 1,000 miles begins with a single step, then NAICC is well on the road to becoming known in Washington.

Eight NAICC staff and Executive Board members visited more than 20 federal legislators, legislative aides and federal regulators October 1-4 while they were in Washington for the NAICC Executive Board meeting.

"You make progress up there one step at a time," said Harold Lambert, NAICC president-elect.

NAICC President Maggie Alms was pleased with her visits and the reception she received. "I've been on the NAICC Board over four years, and in that time have been to Washington twice before representing our profession. But this time was different, the mood was different. This time we were not strangers. We were welcomed as representatives of an important player in American agriculture," she said.

In general the NAICC visitors discovered that although consciousness has been raised at the Executive Branch, the members of Congress and their aides did not know much about NAICC, what consultants and contract researchers did for a living, nor did they have any pre-conceived notions about the organization. However, most appeared to be extremely receptive to information on NAICC and issues that concern its members.

Alms said staffers for one Senator and one Congressman told her their bosses were looking for "bridge-builders" between the agriculture and environmental communities in the upcoming 1995 Farm Bill debate. She told them to look no further than NAICC.

Dennis Berglund, NAICC treasurer, felt positive about his meetings with six or seven Congressional representatives or their staff members. "They were left with the realization that, geez, there are people out there making a living doing this — implementing IPM," Berglund said.

"Congressman Doug Bureuter (R-Neb.) commented, 'This is the first time anybody ever contacted me explaining about your organization'," said Yella Reddy, Executive Board member.

When Reddy mentioned some of the Nebraska farmers he worked with, Bureuter perked up and said, "Yes, I'm surrounded by your clients."

Lambert described the federal officials he visited as "open ears." They wanted to learn as much as they could from us, he said.

Prior to the visits, Alms worked with Board members to develop key statements to tell lawmakers about NAICC. Executive Director Allison Jones explained that protocol required that each appointment last no longer than 20 minutes, so statements and issues had to be boiled down considerably. Issues touched on were Worker Protection Standards and the 1995 Farm Bill as well as a few general programs. Under this 'general' umbrella, the following issues were mentioned to legislators and their aides:

• Education. We in NAICC need continuing education and education curricula at the university level that will ensure a new crop of consultants in the future and we want to help design the programs;

• Research. We would like to influence university research programs to help identify research direction;

Executive Board Holds the Line on Membership Dues

The Executive Board bit the bullet and held the line on membership dues for another year. At its October meeting in Washington, D.C., the Board once again pegged $195 per year as the 1995 dues for voting, provisional, and associate members of NAICC. A fee of $65 was set for retired members.

The Board also voted unanimously to recommend revised membership categories. Under the new wording, which was included in the revised articles of incorporation mailed to voting members this month, all applicants will immediately become provisional members of the Alliance.

(Continued on page 4)
Thursday Oct. 6, 1994

I'm on an airplane, circling Minnesota. With thunderstorms, tornado watches, and a downed radar system at the airport, I might be here a while. It's a good time to reflect on the past week.

I'm on my way home from Washington, D. C. I'm exhausted. But I'm also exhilarated and feeling strong. If I had only one goal this year as president of NAICC, it would be “promoting the profession.” I want our work acknowledged and respected by those outside, as well as inside, agriculture. I want to continue the job of helping shape a profession of high standards, then see it be recognized.

And that's what we did in Washington. I've been there twice before representing NAICC. But this time was different. We were speaking with a clearer, more unified voice. We're starting to know what we want, and we're learning how to make it happen. WE are different.

But the reception was different too. The time is ripe. Not everyone has heard of us yet, and many of those who have heard still do not understand. But everyone is listening now. They want to listen. The 1995 Farm Bill is presenting an opportunity unlike we've had before to tell our story.

If we can continue to tell it clearly, and if we can do it without an air of superiority arrogance and self-preoccupation, I am confident we will gain wide respect. That respect will translate into recognition. And that will mean solid establishment of our profession, and its continuation into the future.

Friday, Oct. 7

A day later than planned, I finally arrived home. It's time to concentrate on my business and my clients.

My clients have been very patient and supportive this year. It's hard to count how many times I've tried to answer their questions long-distance from NAICC meetings or speaking engagements. I've tried all year to give my best to both NAICC and my clients. It hasn't always been possible.

But somehow my business has survived, even flourished. There were two amazing phone messages this week. Two brothers I worked for years ago called to tell me they miss my service and want to rehire me. The other message was from a farmer referred to me by his farm management specialist. Did I really just spend a week in Washington and come back to 2,000 acres of new contracts?

Saturday, Oct. 8

Today I was a mom, only a mom. It's my favorite job, but the hardest to keep in perspective this year. Today my three kids and I hiked in the woods on our farm. The trees are beautifully golden and orange. We followed deer tracks and crossed the creek on stones. Then we spent a long time scattering milkweed seeds in the meadow, watching them float in the wind.

Tonight we went to the play “Tom Sawyer.” Whitewashing a fence by energizing others. What a story!

Sunday, Oct. 9

I'm not a great Biblical scholar but I do attend church regularly, and the text this Sunday made a real impact. It was the story about Moses leading the people out of Egypt. At one point he, feeling absolutely overwhelmed by the responsibility, called out to God for help. “I'm worn out,” he cried. “This responsibility is too heavy on my shoulders. HELP me.” And God did. He told Moses to find a group of people who could be trained as prophets to help carry the burden. And they did.

I told the NAICC Board that sometimes I've felt like Moses must have felt. Completely overwhelmed with this job. But somehow there has always been someone there to help me. Each member of the Board has done great work, carrying parts of the load. And the staff has done an astounding job of helping this organization move ahead. Committee chairs and committee members also have pulled together and accomplished much. NAICC is going to move ahead only through the shared efforts of everyone.

I am truly learning the power and strength possible when a load is shared by many.

Monday, Oct. 10

The weather was sunny and warm. After a week of rain, there were combines in the fields every where. Yields are tremendous. One client told me his corn test plot had 10 varieties which yielded over 200 bushels per acre. He's a manure-management expert, so he spent less than $6 an acre for fertilizer and nitrogen combined. Grinning from ear to ear, he told me, “We need a new consultant now, so we can do a better job.”

Today I had a phone call from the South Dakota group of crop consultants and the Nebraska group asking me to speak at their winter meetings in March. I hope I can do it.

Tuesday, Oct. 11

I'm working on a public-private research project assessing soil quality indicators as effective tools in the field. I spent all day on that project comparing native prairie sites to Conservation Reserve sites to conventionally farmed sites. We're measuring bulk density, particulate organic matter, aggregate stability, biological activity, carbon/nitrogen ratios, nutrient levels, and more. A soil quality indicator test, if it is possible, would definitely help me advise my clients as they make tillage and other management decisions.

I also spent time today talking to the engineer supervising a global positioning system/yield monitoring test project with farmers in the area. Two of my clients are involved, and I'm learning a lot about high tech agriculture.

Is technology the answer to an economical and environmental agriculture? It's part of the answer, I think. The NAICC annual meeting in late January in San Diego will help us be better informed about the new technology. This project is certainly exciting, and the possibilities seem endless. But I worry that it's all SO exciting we'll lose sight of what's important. My speech at the annual meeting will probably be more about the people in agriculture than the technology.

Wednesday, Oct. 12

More soil sampling. More juggling of responsibilities. I talked to clients, to Allison, and to Jackie (she's starting to wonder where my column is). Another day spent as a mom, a consultant, and a president of a national organization. If I survive, I'll never forget this year.
Ethics Defined In A New Age

by Don Jameson

After receiving an invitation last January to write a column on ethics, I've contemplated this for a long time before putting pen to paper. Or, in modern phrase, fingers to a keyboard.

Let me kick off on that writing comparison, to note that it seems the old approach to ethics is everywhere taking on a new modern expression and definition. Why so? I don't remember 20 years ago reading much about ethics committees. Now our state executive, federal executive, and Congress have ethics committees. And if you read your news, violations of the ethics code in Congress, and in the federal administration or elsewhere pop up repeatedly.

What is the old definition of ethics? According to Webster's ninth edition it is written: ethics is 1.) the discipline dealing with what is good and bad and with moral duty and obligation; 2.) a set of moral principles or values; 3.) the principles of conduct governing an individual or a group (professionals).

And for the word moral the book gives this definition: 1.) relating to principles of right and wrong behavior; 2.) expressing or teaching a concept of right behavior; 3.) conforming to a standard of right behavior; 4.) sanctioned by or operative on one's conscience or ethical judgment.

What jumps out at me are two items. The idea of right and wrong as simply a given which does not need defining, but is considered understood by the reader. Secondly, do you find any phrase relating to action according to the law or regulations?

This leads to the point of our national attention on ethics. In groups of people as in our society, there is disagreement — or more correctly a lack of knowledge — of what is right or wrong. This is referred to as relativity of values, or in jargon, "Do your own thing," or "If it feels good, do it!"

There is a collective and pervasive confusion about what is ethical. Within our NAICC organization, we've confronted differences of opinion on what is acceptable as gifts, or advertising give-aways. At the individual level this is seen on the stage of notable politicians, in corporate financial deals, in the savings and loan banks' fiascos and with numerous other examples. We think often an ethical breach is typified by bending the rules, code, etc. for monetary gain. Yet increasingly "right from wrong" is not known by even pre-teens who are caught in crime and kill fellow human beings. Any of you reading this, can you think of an instance in your state or community where young people have killed someone? Who do they learn that from?

This column may have taken a philosophical tangent you think inappropriate. Yet, as I contemplate the reputation of ethical behavior we crop consultants and the NAICC have strived for, and largely achieved, the broader aspects of ethics in our society are still intricately intertwined. Our question seems in part this: what can and will we be as an organization unless we are first the same as individuals? Thus, I see great prospects for the ethical stance and reputation of this organization because I know many of you individually and the quality of character you possess. (Some of you are just characters with character.)

I do applaud the concepts and statements on the code of ethics of our organization. I think this is appropriate for a professional organization. One ancient precedent for such is the Hippocratic oath. It is reasonable and appropriate to include ethics as a newsletter column and a convention topic. Working through and sharing professional behavior, young and older consultants can be mentors to each other on right and wrong behaviors that we individually (or our businesses) have in dealing with clients, employees, neighbors and our community.

Lastly, my comment would be to our society of individuals. Can we again have a consensus or majority of agreement on right and wrong? Who will be the voice of authority on what is right? Will the message vary or flip flop as it booms from government, from universities, from city councils or from cathedrals and chapels? Will it display any similarity from family to family? Will it have consistency from consultant to consultant?

I have to end by expressing my belief in the centuries old and proven Bible scriptures which do admonish us: "None are righteous, no not one!" But the Bible gives us an operator's manual or love letter with directions for living and defined ways for right behavior. In other words, for ethical living. When I individually accept that authority, I believe my professional ethics even in the "gray zones" will be just. Then we can read of our works in the newspaper without embarrassment. I think this is what Noah Webster assumed of our English-speaking society when he wrote the definitions of ethics and morality.

(Don Jameson of AGRIMANAGEMENT in Yakima, Wash. is a voting member of NAICC.)

(Washington Visit... continued from page 1)

- Information. We would like to assist in developing information conduits to enhance communication between policymakers and field level farmers;
- Inventory. We would like to assist in developing an inventory of integrated pest and crop management systems that already exist.

Reddy said the biggest accomplishment of the Washington visit was to establish on-going relationships with the policymakers.

For the most part Congressional representatives and their staff members appeared grateful to have NAICC as a resource. Berglund said he felt good about the impression he and other board
members made, but cautioned: “We’ll see what comes of it, if they remember us.” But, he said, something important did happen besides the education of federal government officials about NAICC. NAICC officials became more knowledgeable about how to approach government officials and, better still, got comfortable doing it. While most NAICC members had good visits with their Congressional representatives, it was not all fun and games. Alms said she had two separate discussions on government creating an “artificial demand” by requiring farmers to use crop consulting services, a position NAICC opposes.

“It also became very clear to me, after many discussions, that the Certified Crop Advisor (CCA), not the Registry of Environmental and Agricultural Professionals (REAP), program has become the measuring stick by which government is looking to measure agricultural practitioners,” said Alms. “It is also clear that there are many who, although they are using the same measuring stick, understood the need for another program. This creates a window of opportunity for NAICC.”

Some officials visited by NAICC were exhausted and pressed by the closing days of the Congressional session (it was four days until Congress adjourned for the November elections) and seemed to have little energy left for agricultural information. A few were uninformed about agricultural issues and displayed no inclination to learn.

Board members had a very productive conversation with Mike Fitzner, National Program Leader for IPM, who has demonstrated his friendship to NAICC on several occasions. Fitzner provided them with a copy of the 1994 Special Projects for IPM Extension Service, USDA. Lambert noted a project funded for $34,800 to assist a state university’s Extension to develop a fee-based IPM service.

“We gently informed Mike that this type of project is difficult for us to stomach because it does not include independent crop consultants,” said Larry Stowell, an Executive Board member. “We were not trying to discourage Mike from developing this type of project, but rather to look at all sectors of the management information system and to support all sectors equally, rather than singling out a single sector.”

Unlike most Board members, some of Stowell’s visits to Congressional representatives and their aides were less than satisfactory. In one case the Congressman and his aide were obviously at the end of a very long day that occurred at the end of a very long Congressional session.

“His staffer may actually have fallen asleep, but she didn’t snore,” Stowell said.

Lambert, however, felt he had the attention of everyone he visited. “They seemed interested in what we had to say,” he said. Reddy was asked for information about a problem in Nebraska before he left his Congressman’s office.

Stowell’s visits left him feeling reflective about NAICC’s role in Washington and in federal agricultural policy today.

“At our present size and influence level, I think we can and should continue to present a positive image for the agricultural profession with policymakers. This alone is important. However, if we are going to make an impact within the agricultural industry, we need to team up with our friends who all have a common interest in promoting the sustainability of the American agricultural industry,” Stowell said.

“We had several walks under the beautiful clear fall sky during our visit to Washington,” he continued. “The Capitol Building at night was an inspiring sight with the Washington Monument in the distance. It was a beautiful image. It was also a humbling experience as we walked away from the Capitol knowing that the laws of the land were being formed. It was even more disconcerting to know that those laws were being drafted by what in science fiction terms might be referred to as ‘flat-liners’ in regard to their knowledge of agriculture.”

(Executive Board... continued from page 1)

Applications will then be forwarded to the Membership Recruitment and Rules (MR&R) Committee, which will make a determination on the appropriate permanent membership category.

Those who have the required education and experience, and who respond affirmatively to the questions designed by the MR&R Committee to determine independence will become voting members; those who fulfill the education and experience requirement but do not meet the independence test will become associate members. Those who wish to support the mission and goals of the Alliance will become provisional members. It is possible though not necessary, to move to other membership categories when specific requirements are satisfied.

“The revised categories are part of the goal, recommended by the MR&R Committee, to be more inclusive,” said NAICC President-Elect Harold Lambert. “NAICC has opportunities and benefits for everyone involved, or affected by agriculture, not just our voting members. We want everyone to feel welcome and to get involved.”

Executive Vice President Daney Kepple said she was gratified both by the new wording and the Board’s ability, through scrupulous attention to the budget, to keep dues under $200.

“There may be a few wealthy crop consultants and contract researchers out there, but for the most part this is a group of people who have to watch expenses pretty carefully,” she said. “The leadership of the Alliance has done an outstanding job of increasing membership services rather dramatically without raising dues. Their attitude, which I certainly endorse, is that we would rather have 500 members paying $195 than 200 members who could afford higher dues. We need the energy and support of everyone to fulfill the NAICC mission.”
Certification for Professional Crop Consultants: The Dream Evolves

by Earle Raun

How many agricultural consultants are there in this country? Ten thousand? Twenty thousand? The answer to that question is determined by the definition of the term. County agents, dealer fieldmen, Extension specialists, farm managers, machinery dealers, and many, many more are ag consultants in the broadest context.

In the winter of 1977, a small group of independent ag consultants met in a Texas hotel to discuss mutual interests and problems, and what actions the small group could take to further our profession. The needs all pointed toward a national organization of individuals who worked with crop producers in a similar fashion.

The issues we identified included:

- The need for agriculture to have a voice that could speak with the rest of agriculture and with environmentalists and general consumers on matters that affect us all;
- While most of us belonged to an academic professional society, those organizations were not structured to meet the needs of a group of multi-disciplinary independent practitioners;
- We found that we had similar work problems whether we came from Texas, Nebraska, New York, or Oregon, and we felt that sharing experiences at an organization’s annual meeting would help us all.

We concluded that we needed an organization that would help differentiate ourselves — our qualifications and our approaches to advising clients — from the other groups listed in the first paragraph of this article. And NAICC was born.

The Alliance as it exists today has evolved from that early beginning. Its code of ethics, constitution, by-laws, and articles of incorporation, which are currently being revised to conform to legal requirements and changes in the organization, continue to mandate proactive involvement in the movement for continued abundant and safe food and fiber, reduction of environmental insult from overuse or improper use of ag inputs, and integration of crop management practices compatible with sustaining agriculture in an increasingly complex world.

In this complicated world, crop producers want to employ the expertise needed to supplement their own abilities, training, experience, and available time. That usually means the person with that expertise must also be broadly trained and experienced in crop production practices. Knowing a lot about the biology of the insects, weeds, or diseases of an agricultural system isn’t enough. That knowledge must be woven into the agricultural system in which it is to be employed.

A professional degree in agricultural subjects just prepares the foundation for the degree holder to begin a lifelong learning process in his or her chosen field. The professional must keep up on developing research that impacts the system. The professional must be aware of changing regulations that influence what may be involved in the particular environment and practices of the client. A true professional participates in his or her professional organization.

From the beginning, NAICC identified several strong needs: curriculum changes in universities that would train the coming generations of crop consultants in the interdisciplinary manner our profession requires; continuing education to keep the rest of us on the cutting edge of technology; and a certification program to document basic credentials so farmers and firms in need of employing expertise would understand what they were “buying.”

Designing and implementing a certification program is no simple matter. There are complicated legal issues, academic issues, and statistical issues involved which require various types of expertise outside the realm of knowledge of most practicing crop consultants and contract researchers. So when we went “shopping” for a group to administer our program, we approached ARCPACS, the agency that administers certification programs for several of the academic professional societies. For a variety of reasons, our negotiations with ARCPACS did not come to fruition.

About that same time, a group of visionaries within NAICC and elsewhere conceived the idea of a registry that would certify the credentials of both environmental and agricultural professionals. Following the old “two birds with one stone” logic, we figured that such an organization could also provide a forum for discussion between environmentalists and agriculturalists — discussion that we hoped would lead to consensus and saner national policies concerning agricultural production and research. Thus the Registry of Environmental and Agricultural Professionals (REAP) was born.

About four years ago, NAICC began offering a certification program to independent crop consultants, administered by REAP. The program is designed to assure clients and potential clients that certified individuals meet minimum education and experience standards, agree to abide by a code of ethics, and are not involved in product sales. It isn’t necessary to belong to NAICC to become certified. Currently, 106 individuals are certified under REAP.

It was our fond hope that other organizations would join REAP, but that dream has not come to fruition. REAP is involved in many good things, including seminars and input into national policy. Unfortunately, due to lack of funding, the Registry has not been able to publicize our program widely, and there remains a fair amount of confusion and uncertainty about the future of NAICC’s certification program.

This is an issue the NAICC Certification Board, the Executive Board, and the leadership of our organization are working on. Over the past several months, staff and Executive Board members have attended several national meetings to discuss certification with leaders of other professional societies, ARCPACS, and representatives of the Certified Crop Advisor (CCA) program. The goal is to develop a program that meets the needs of our members and that is widely recognized both inside and outside NAICC.

Between now and the San Diego annual meeting, the Certification Board will deliberate the issues and make a
recommendation to the Executive Board. Their challenge is to decide what we want, what we don’t want, what we can afford and what we can live with. Their further challenge is to remove history, emotions, and personalities from the debate.

The rest of us have a challenge, too. I know I’m not alone is having some strong opinions and feelings on this issue, having been involved in it for so long. I know what I want our testing program to be, and I know how I want my certificate to read. I also know I am one member of a 400-member organization, and that others may feel just as strongly that things should be otherwise.

It’s hard for a former leader to let go and trust those that come after. It’s hard for individual members to delegate authority and decision-making responsibility to our leadership. I’m not saying we don’t have the right — in fact, we have the responsibility — to make our thoughts and wishes known. By all means, call a member of the Certification Board, as I have, and express your opinion. When you do that, be sure you’re prepared to listen with an open mind. The issues are very complex, and those who haven’t spent a lot of time grappling with them are likely to overlook a lot of subtleties and ramifications.

As in any democratic organization, our biggest challenge is to pull together and support the decision made by the people we elected to work on our behalf. Not until we master that skill can NAICC realize its full potential.

(Earle Raun of Pest Management Co. in Lincoln, Neb. is a voting member of NAICC and the organization’s first president.)

Quality Assurance and Quality Control: What’s the Difference?

by Diane E. Bradway

Quality is one of those words that is thrown around frequently, is applied (appropriately or inappropriately) to many situations, and is somewhat of a buzzword of the ‘90s. Quality is desirable, if not essential, to modern life. But like so many things, it is not always easily come by.

Two tools are used to ensure quality: quality control and quality assurance. Both are necessary to produce a quality product, but they are different in purpose and application. And the terms are often confused and misused.

Quality control is an internal procedure. It consists of those checks and safeguards that you have instituted to assure yourself that the process is operating as it should. On a manufacturing assembly line, quality control might consist of pulling a certain percentage of the units off the line to see if they meet specifications. In an accounting firm, it might consist of double checking figures, or having a supervisor verify the accuracy of data entry.

When considering pesticide field studies, we have two critical areas where quality control is needed. The first is the field site where the test substance is applied to the test system. The second is the analytical laboratory where specimens are analyzed to determine the fate of the test substance. If either of these processes is not operating properly, the data produced in the study are not reliable enough to be used in further evaluations. Quality control procedures can be applied to both processes.

Commonly, field quality control takes the following form: 1) control plots are included as part of the study to provide assurance there is no interference from the crop matrix, maintenance chemicals, or cross-contamination; 2) field spikes are prepared at the time of specimen collection and shipped to the laboratory for analysis.

In the analytical laboratory, quality control takes the form of verifying the precision and accuracy of an analytical method. Precision and accuracy are critical concepts in chemical analysis. Precision is an indication of the reproducibility of the methodology. Precision is estimated by analyzing a number of replicates containing identical amounts of analyte, and can be evaluated statistically to determine the standard deviation for the set of analyses. The smaller the relative standard deviation the more precise the method. However, a precise (reproducible) method may not necessarily be an accurate method. Built in biases may skew the method consistently in one direction or the other, away from the true value. The accuracy of the method is usually determined by adding a known amount of analyte to a control specimen and seeing if the analysis produces the “right” answer.

Quality assurance is an external process, conducted by an independent agent (the quality assurance unit) to assure others (the study director, the sponsor, regulatory agencies) that quality systems were in effect and operating. Quality assurance is a system of monitors, inspections, and audits which assures the quality and integrity of the data being reported. Quality assurance is aided by protocols and standard operating procedures, by qualified personnel, by adequate equipment and facilities, by calibrated instruments, and all of the other procedures and systems which are needed to provide reliable data.

(Diane E. Bradway of Environmental Quality Assessment Services in Hood River, Oreg. will be one of the speakers at the NAICC annual meeting in San Diego in January.)
Looking at the Future of Contract Research: A Project Management Company Perspective
by Milton C. Ganyard, Jr.

Although economics would seem to drive industry more in the direction of contract research, my contacts with industry give an ambivalent picture of the trend.

On one hand, some companies are clearly moving to reduce costs by exchanging full-time in-house personnel and facilities for contract services. This, of course, means more services (including field testing) will be contracted out by these companies. On the other hand, some companies appear to be building up staff to handle field studies. This move may be influenced by EPA’s narrow view that a single individual designed as the “Study Director” must serve as the single point of control over the entire study (field trial conduct, sample transport, analytical phase, storage stability, logistics management, data interpretation and integrity, report generation, etc.). Whatever the motivation, some companies are moving in one direction and some are moving in the other. Some have tried one way and now are trying another.

Factors in favor of continued growth in the use of contract field trial facilities include:
- Registrants need to conduct field trials in many different geographical locations over a given period of time. The new “Number and Location of Domestic Crop Field Trials” guidance document from EPA details the minimum number of field trials for any particular crop residue study. This is the first time in the agency’s history the required minimum number of field trials have been made known. It is possible for a company to operate only so many of their own field testing facilities;
- EPA may soon require efficacy trials to be conducted under GLP and tougher guidelines;
- Many offshore companies wishing to register compounds here have no U.S. facilities or research staff at all.

These factors favor contract field testing operators.
Factors which could inhibit growth of our trade include:
- Industry’s perception of contractor cost and quality;
- Consolidation within the industry, yielding fewer companies with more power and greater resources, but with a tendency to second guess the need for additional testing. Resources are used cautiously with as much an eye to the stockholders as to the registration requirements;
- The regionalization of crop field trials in the new guideline referenced above could favor fewer, more quality conscious contract field testing facilities.

We as contractors have a certain amount of influence on industry’s perception of the quality and cost of work done by contractor facilities. About a year ago I was attending an American Crop Protection Association (formerly the National Agricultural Chemicals Association) meeting with representatives of some 20 plus agricultural chemical companies. At one point in the meeting they were discussing the costs involved in registering and re-registering agricultural products.

When they discussed the comparative costs of doing their work in-house versus contracting, one of the participants asked, tongue in cheek, “How do contracting costs compare after you repeat the study a couple of times?” The tone of the group’s laughter that followed sounded like all too many were laughingly through pain. It behooves us all to do the very best job we can on every trial or study we conduct.

I believe the situation referenced above was aimed mostly at contract laboratories rather than contract field trial facilities. It has certainly been our experience that more studies fail in the lab than in the field.

It is my personal opinion that the jury is still out on the future of contracting in general in the agricultural chemical industry. I am more optimistic about contract field testing facilities than contract laboratories. If we do quality work at a reasonable price, industry will be encouraged to move more in our direction. Most of the contract field testing facilities we work with are doing just that.

(Milton Ganyard Jr., a former crop consultant, is now president and CEO of Environmental Technologies Institute, Inc. in Research Triangle Park, N.C. He is one of the speakers at the NAICC annual meeting this year.)

WPS Decision for Crop Advisors Gets Boost
by Allison Jones, Executive Director

While in Washington last month, the NAICC Executive Board met with EPA officials Kathy Carnapulus, chief of the Occupational Safety Branch, and Kevin Keaney, environmental specialist of the Occupational Safety Branch, to discuss the proposed Worker Protection Standards (WPS) language for crop advisors.

Incoming NAICC President Harold Lambert, acting as spokesman for the group, reiterated NAICC’s position that scouts need to be included in the proposed language which would exempt crop advisors from all WPS requirements with the exception of notification requirements.

EPA told the Board that the issue of a crop advisor exemption has become so political that it has been elevated to the Assistant Administrator level. This means that Lynn Goldman and her counterparts within the agency will be making the decision. This is supposed to expedite the decision-making process, yet EPA does not expect this
issue to be resolved before the standards are slated to go into effect Jan. 1, 1995. To ensure a smooth transition into 1995, EPA has stated, "...the agency intends to issue guidance to states that will describe the potential revisions and recommend enforcement discretion until the crop advisor provisions are formally revised in early 1995." EPA has promised continued dialogue with crop advisor organizations with regard to the revisions.

EPA formally responded to the recent National Association of State Departments of Agriculture (NASDA) petition (see related story, October issue) in a letter which outlines the process EPA will follow to address the concerns presented on WPS. One area of concern was "low contact activities." NAICC has submitted a list of low contact activities performed by crop advisors and scouts to the NASDA Working Group, which is made up of organizations who signed the petition. NAICC will send this list to Lynn Goldman in a letter that states our positions and reiterated that as a vital part of our operations scouts should be included in the WPS exemption.

If you would like a copy of the letter, please contact the Memphis office.

Annual Meeting Fee Cut by More Than 20 Percent

Many of you have expressed a desire to have more control over what you pay for at the annual meeting.

In response to this request some changes have been made in this year’s registration fees. Last year we had an all-inclusive fee which covered registration, evening meals, and all functions. In an attempt to be more cost effective, this year members may purchase only the events they want to attend.

Another way to save money is by registering early. The registration fee for members who register before Dec. 18 is $180 — a savings of $50. Registration fees for members who bring two or more employees to the annual meeting will be figured on a sliding scale, with the first payment being $180 and the fee for each additional person pegged at $150.

A factor in the ability to offer savings to members is increased sustaining membership sponsorship.

This important group sponsors many of the events that you attend and keeps the prices for these events low and many times, even free. Sponsorships keep administrative costs low and, in turn, help keep registration fees reasonable.

NEW MEMBERS

VOTING

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Crops: Cotton, almonds, alfalfa, onions, garlic, beans, carrots and grapes
Services: Agronomy and entomology

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Crops: Cotton, soybeans and milo
Services: Early weed identification for burndown and insect control recommendations