



OFFICIAL PUBLICATION OF THE NATIONAL ALLIANCE OF INDEPENDENT CROP CONSULTANTS

PRESIDENT'S COLUMN



By
Gary Coukell
NAICC
2014 President

President's Letter

"How did it get so late so soon? It's night before it's afternoon? My goodness how the time has flown. How did it get so late so soon?"

-- Dr. Seuss

We can all identify with the good Dr. Seuss, can't we? Despite all of our meticulous planning throughout the winter, Mother Nature reminded us that crop planning is always "subject to change."

I'm sure all NAICC members did many of the same preparations, investing time and energy in ramping up for spring. Equipment tune ups and replacements, ordering in supplies, client visits and

planning, hiring and training employees ... the list goes on and on. But then the rains came. And the snow fell. And the severe weather struck. And the rains came again. And the snow returned. All until the reality settled in with just two words: **Late Spring.**

Late Spring, with its wet fields and cold conditions, has put us about three weeks behind schedule. Yet somehow I doubt that Fall will miss its deadline! This naturally invites stress and anxiety about getting our work done in time and about having enough growing degree days before harvest and/or the fall frost. NAICC members will, of course, all take this challenge head on. In fact, our approach will be very similar to our spring preparations and can be summed up in just two words: **Be Prepared.**

We have all been through extreme weather conditions before. NAICC members have the experience, the skills and the resourcefulness to turn a "delay" into an "extended planning period"! Here few key thoughts to help with planning:

1. Plan proactively: Examine plans and make the appropriate adjustments

now so that you can move quickly and efficiently when it's time to harvest.

2. Check and Recheck: Maximize time use at harvest by thoroughly inspecting equipment, schedules, protocols, plans, labor allocation, etc., long before harvest hits. If applicable, ensure that employees have all required training.
3. Consider the Big Picture: What actions can we take now that will ensure timely harvest activities, fall soil sampling, and reports in the fall and winter months? How can we document any adjustments made in equipment, employees, training, scouting plans or trials that will be of benefit in future seasons?

Lastly, take advantage of your NAICC connections during this time. Talk with other members. Share your perspective and gain theirs. Learn from each other. Help each other. In doing so, I'm confident we will enter the harvest season with just two words: **We're Ready.**

Oops! We Goofed

By Allison Jones

During the NAICC Awards Luncheon at the 2014 Annual Meeting, we incorrectly stated that David Wilde joined NAICC one year after it was started. Actually, he was a Founding Member. David, we apologize for the error and have updated the NAICC database accordingly.

The inaugural planning meeting took place at the Peabody hotel in 1977. For the first official 1978 Annual Meeting, David Wilde, Stan Nemec, Larry Emerson, Dan Bradshaw rented a van to drive from Texas to Memphis because, as Dan put it, "We were all poor!"

Also, in the late 1970's, David, Larry and Dan were eager to join the Texas Association of Agricultural Consultants (TAAC) organization ... but first they had to pass a test. It was the first and only time a test was required to become a member of the state Ag consulting organization. These gentlemen still hold that distinguished honor. According to Dan, "We Texans are a by-the-letter-of-the-law bunch!"

Thank you David for your 36 years of dedication to NAICC and for your current service on the Board of Directors.

NAICC Welcomes New Sustaining Member, Rock River Laboratory

Rock River Laboratory has recently joined the National Alliance of Independent Crop Consultants (NAICC) as a Sustaining Member. Beginning as a soil analysis laboratory in Watertown, Wis. in 1976, Rock River Laboratory provides production assistance to the agricultural industry through the use of advanced analytical systems, progressive techniques, and research-supported analyses. In addition to soil analysis, Rock River Laboratory has grown to offer analyses of animal feedstuffs, manure, water, and yeast and molds, while employing a team of top specialists in their respective fields. Rock River Laboratory is dedicated to providing accurate, cost-effective, and timely analytical results to consultant customers, while featuring unsurpassed customer service. The Rock River Laboratory team is excited to join the ranks of the NAICC, and is looking forward to providing

knowledge, expertise and experience to help us continue to do great things for the industry.

In addition to their new membership, the Rock River Laboratory team is hosting an educational soil analysis laboratory tour program at their headquarters in Watertown, Wis. Certified Crop Advisers (CCA) and NAICC members are invited to earn Continuing Education Units (CEUs) toward the certification renewal for each of our organizations, through the new tour program.

Featuring speaker Dustin Sawyer, Rock River Laboratory's soil laboratory manager and quality control director, the free tours can fulfill nutrient management, crop management, and professional development CEUs. Sawyer holds a Bachelor of Science degree in Soil Science and is currently

earning his Master's degree in the same field. He has been involved in the soil-testing industry for 9 years, and is an active member of the Soil and Plant Analysis Council.

CEUs earned through a Rock River Laboratory tour will harbor on analysis, interpretation and uses of soil testing data, use of precision agriculture technology and applications of computer technology and programs to crop advising. Rock River Laboratory works with crop advisors to help those involved better understand and utilize soil analysis as well as discuss possible points of error in the process. A typical tour and discussion will last approximately three hours. The Rock River Laboratory tours are free and available by appointment. Interested parties should call (920) 261-0446 to set up an appointment.

New Member Profile: Joseph Mettler

The NAICC welcomes Joseph Mettler, Agronomist with Agrimanagement Inc., as a new member!

Joseph holds a B.S. in Crop & Weed Science and Natural Resource Management with a minor in Soil Science. He currently specializes in yield trials and efficacy tests, and crop consulting and monitoring for apples, cherries, mint, hops, blueberries, sweet corn and field corn.

Education, community and connections are the main reasons that Joseph joined the NAICC. He believes our organization will enable him to stay updated on the latest technology and sampling methods, and educate our partners (manufacturers, land owners) on the goals of Agriculture.

Introduce yourself to Joseph and welcome him at jmettler@agrimgt.com.

NAICC Partners with GAIAC

Global Alliance of Independent Agricultural Consultants

The Global Alliance of Independent Agricultural Consultants (GAIAC) is a worldwide association formally incorporated in 2012 by independent crop consultants and researchers from across the world including members of the AICC in the UK and the NAICC in North America.

Recently, the NAICC and the GAIAC reached an agreement that all AICC and NAICC members can be pre-approved as members of the GAIAC.

Membership in the GAIAC will be free for AICC and NAICC members in 2014.

To activate your free 2014 membership, go to www.gaiac.org/membership. The Global Alliance of Independent Agricultural Consultants (GAIAC) aims to promote the exchange of information, technology, techniques and experiences on a global basis to allow members to offer timely and pertinent services from a global point of view. GAIAC also aims to promote independent



consultancy and researcher in countries which have poor independent structures. For example, the GAIAC has already provided detailed advice in the formation of a French independent crop consultant association.

GMO & EPA/OECD GLP Regulatory Update & GLP ALERTS

By Dr. Stu Mertz, PEAK Quality Consulting, Inc., Cary, NC

Attending the NAICC Annual Meeting continues to be the premier place to network and get training and timely information for GLP and GMO QA professionals. The QA Corner is your place for highlights!

The next time you visit www.naicc.org, look for 14 presentations in the QA Tracks III-IV from the 2014 meeting, plus 14 presentations in the Researcher Track II. You will find them most useful in your training as a new or experienced field and laboratory QA person. A BIG THANKS to all the speakers for making their presentations available!

Francisca Liem, Director, GLP Program, presented an "EPA GLP Regulatory Update" as well as an overview of the "EPA GLP Desk Top Audit and Inspection Program." Although her presentations are not available on the web site, highlights for FY2013 are summarized below (emphasis on Field Sites, Analytical Labs and Biotech). She said EPA considers field sites as "outdoor laboratories".

EPA GLP Regulatory Update

EPA GLP Desktop Audit Program (DTA) consists of 1) data audits carried out at an EPA office, and followed by 2) an on-site inspection at a testing facility. EPA typically can conduct 4-5 inspections per week.

Totals FY2013

- 181 data audits
- 87 site inspections
- Still did some using the traditional method; most were conducted under the new DTA format.

No. Inspections (% Total)

- 24 (28%) Field Sites
- 12 (14%) Analytical Chemistry
- 5 (6%) Biotech
- 19 (22%) Product Chemistry
- 6 (7%) Antimicrobial Efficacy
- 6 (7%) Insecticide/Fungicide Efficacy
- 8 (9%) Toxicology
- 5 (6%) Ecotox
- 2 (2%) Others

Findings: Field Sites had an excellent rate of compliance!

- 100% of Field Sites had no regulatory deviations (24 sites)
- 83% of Analytical Chemistry Labs had no regulatory deviations (12 sites)
- 40% of Biotech labs had no regulatory deviations (5 sites)

Enforcement Actions (FY2013 finalized)

EPA took action for "lack of raw data or original data altered". F. Liem explained: Raw data are important for the integrity of the

study! Raw data were missing. Just remembering data and putting it in a final report is not acceptable. Data were entered on a yellow pad and transcribed into a lab notebook (things changed).

- EPA is clearly back in the business of penalizing companies (\$7,000 fine per violation & rejecting studies)
- 28 studies were rejected at 6 facilities – GMO 1, Product Chemistry 18, Companion (toxicology) 9
- \$22,680 fine for one GMO facility on two subsequent inspections
- \$28,600 fine at one Public Health Insecticide Efficacy facility

OECD Updates on GLP

- No issues for field studies
- Malaysia is a new MAD member
- Harmonization of GLP: future updates of OECD consensus documents will be issued on Quality Assurance, Computer Systems (#10), test item, and peer review of pathology

GLP Advisory 83 on Retention of Raw Data

Guidance was provided regarding the retention/archiving of raw data as original (paper and electronic formats) versus as exact copies (40CFR160.3), true copies or other accurate reproductions (40CFR160.195(i)) (paper and PDF file format).

1. The Regulatory Risk of PDF copies

- May not be available for future inspection
- Copies are not complete and illegible
- Loss of important forensic information (pen or pencil marks on paper documents, e.g., signatures)
- PDF files can be modified without detection

2. EPA "suggests" for PDF copies to be GLP compliant

- Put a system in place to demonstrate that PDF is and will remain forever a "true" copy of the original, e.g., by a) Creating duplicate DVDs placed in the safekeeping of a neutral 3rd party; or b) Generation of a mathematical hash of the DVD contents by and stored by a neutral 3rd party
- Ensure the unencumbered availability of the raw data in the future as information storage and retrieval technology evolves
- Ensure that data can be reliably migrated to new formats
- Data can be assessed without proprietary software or other technology that may not be readily available to the government without cost or delay

3. Responsibility of the Sponsor: PDF is and will remain forever a "true" copy of the original

Continued on next page.

QA Corner

Continued from page 4.

GLP Alerts

Alert 1.

- Date of completion of study = original date final report is signed by study director
- Date of completion of study does not change when the final report is amended

Alert 2.

- A new version of the Desk-Top-Audit request letter should be available in April, 2014
- The new letter will say that when a company claims information submitted as CBI, the company will no longer be required to submit a redacted version
- Companies must declare CBI on cover page of the CBI data
- EPA will issue a Certificate of Destruction to be included with a "Closure Letter"

Alert 3.

- Sponsor CANNOT revise a study final report for submission to EPA.
- An Amendment to the final report must be signed by the study director.

Alert 4.

EPA Inspection Observations and Closure Letters may not be used for the purpose of marketing a laboratory as this may be interpreted as an Agency endorsement.

If you have a question about a GLP Alert or regulatory action, please contact F. Liem, Director, GLP Program. (Liem.francisca@epa.gov)

EPA GLP Desk Top Audit and Inspection Program

Frances outlined EPA's interpretations regarding the roles and responsibilities of both Sponsor and a Test Facility (i.e., field and lab CRO's) to produce the required submission of true copies of raw data for this type of audit. These are as follows: (TS = test substance)

Roles and Responsibilities - Sponsor

I. Raw data at Sponsor

1. Make copies of study data (paper or PDF)
2. Make copies of TS characterization data

3. Certify true and exact copies
4. Send raw data, TS characterization
5. Certification to EPA (EPA form)
6. Require TF to send TF data to EPA
7. Copies to be returned or destroyed?
8. Refusing to send data may cause EPA to consider study not reliable

II. Raw data at Test Facility

1. Contact TF to send study and TF data to EPA
2. Send TS characterization data to EPA
3. Refusing to send data may cause EPA to consider study not reliable

Roles and Responsibilities – Test Facility

I. Raw data at Test Facility

1. Inform sponsor of EPA notification
2. Make copies of study data (paper or PDF)
3. Make copies of TF data
4. Certify true and exact copies
5. Send raw and TF data, Certification to EPA
6. Copies to be returned or destroyed?
7. Be available for questions from EPA
8. Be ready for facility inspection
9. Refusing to send data may cause EPA to consider study not reliable

II. Raw data at Sponsor

1. Inform sponsor of EPA notification
2. Make copies of TF data
3. Certify true and exact copies
4. Send TF data to EPA
5. Refusing to send data may cause EPA to consider study not reliable

These additional key concepts were identified during a panel discussion following Frances' talks:

1. EPA maintains data confidentiality by destroying true copies of data after a desk top audit; or sponsor can request that it be returned to sponsor or TF.
2. EPA now interprets that an adjuvant (e.g., surfactant) should be treated as a "reagent" when added as tank mix component in the test substance application. Therefore, the adjuvant container would need to be labeled per 40CFR160.83, which may include handwriting on the storage conditions and expiration date. Also the field facility should have a SOP about this and how to assign an expiration date.

3. EPA must continue to perform audits and inspections of facilities even though there is a high compliance rate in the USA because of the need to document compliance for OECD country registrations.

4. An EPA GLP audit/inspection (do you need one?)

- Can be requested by an OECD country if one was not done recently by EPA
- Cannot be requested by a Test Facility
- Can only happen after a sponsor has submitted a final report to the EPA
- Of a new field or lab CRO gets priority in selection for audit
- EPA recommended this approach for a new or existing company that has not had an EPA inspection for a while - appropriately "remind Frances that you have not been audited recently"

Benefit of NAICC partnership with EPA: During 2013 annual meeting NAICC worked closely with EPA to figure out how to assist new and under-inspected labs. After the meeting, four companies were inspected using this "reminder" approach. A new CRO is likely to be inspected using the traditional all-on-site method.

Be sure to attend the 2015 NAICC Annual Meeting in Reno, NV for further QA training and EPA Regulatory Updates.

Always remember the "big picture." Failure is simply a tool to help us improve the next time.

State of NAICC's Annual Meeting

January 21-24, 2015

Peppermill Resort Hotel and Spa
Reno, NV

Reserve your room now!

[https://aws.passkey.com/
event/11421422/owner/7268/home](https://aws.passkey.com/event/11421422/owner/7268/home)

January 27-30, 2016

Lake Buena Vista Palace
Orlando, FL

2017

St. Louis, MO or Kansas City, MO?

Email AllisonJones@naicc.org with your thoughts on your preference on STL or KC or what other cities you would like to host the 2017 NAICC Annual Meeting!



Happenings on the Hill

EPA

EPA is granting a 60-day extension to the comment period on its proposed Agricultural Worker Protection Standards following concerns that the initial 60-days allowed by the agency was insufficient to fully review the more than 300-page plan.

EPA sets the new comment deadline at Aug. 18, citing the request from stakeholders. Previously the comment period was due to expire on June 17. Groups including the NAICC, PPC, American Farm Bureau, the National Council of Agricultural Employers and CropLife America, among others, had requested a 90-extension of the comment period.

The EPA says it doesn't appear the EPA's proposed CWA jurisdiction rules have any effect on pesticide permitting programs. Supposedly nothing really is expected to change regarding spraying pesticides that are subject to NPDES permitting regulations.

FARM BILL

The American Farm Bureau has introduced a new series of webinars on its web site to assist farmers, landowners and others better understand the provisions of the 2014 Farm Bill. Features include videos on key commodity programs and crop insurance. Webinars include overviews that describe basic provisions and details relating to participation. The USDA announced it will provide \$6 million in funds (Farm Bill) to universities and cooperative extension services to develop online decision making tools and training to educate producers.

USDA

The USDA has announced a Regional Conservation Partnership Program based on provisions in the 2014 Farm Bill. The new program reflects the goals of the previous program that included the Great Lakes Basin Program for Sediment and Erosion Control, the Agricultural Water Enhancement Program, the Cooperative Conservation Partnership Program and the Chesapeake Bay Watershed Initiative. Agriculture associations are eligible to submit applications for projects working

directly with growers and address conservation activities in a specific region or watershed area. Water quality, quantity and retention, as well as habitat and air quality, are suggested areas for participation. Initial applications are due July 14.

A USDA survey of beekeepers shows fewer colony losses occurred in the US during winter 2013-2014 than in recent years. However, beekeepers state losses remain higher than the level that may be considered sustainable. The survey stated colony losses from all causes were 23.2% nationwide. Beekeepers state that number is higher than the 18.9% level that is acceptable for economic sustainability. (It is an improvement over the 30.5% loss for winter 2012-2013).

Pesticide use in the US over the past 50 years shows a peak of 632 million pounds in 1981, 468 million pounds in 1987 and 516 million pounds in 2008. The study shows that usage is mostly driven by changes in planted acres, crop and input prices, weather, pesticide regulations, the introduction of new pesticides and the adoption of GMO seeds. In 1960, insecticides represented 58% of the volume and 6% in 2008. Herbicides accounted for 18% of the applications in 1960 but 76% in 2008. Total expenditures for pesticides totaled \$12 billion in 2008, five times the amount spent in 1960.

CLIMATE CHANGE

A recent study of 1,300 farmers in North Carolina, Mississippi, Texas and Wisconsin indicates that farmers aren't readily accepting the concept of climate change or the science behind it. In three of the states, approximately 25% of those surveyed agreed or strongly agreed there is scientific evidence to prove climate change. Many of the respondents agreed or strongly agreed that human activities are responsible for the changes. However, they were overshadowed by farmers that had no opinion on questions regarding climate change and influence by humans. A majority of the respondents felt normal weather cycles have caused most of the change in climate. Seventy percent of the respondents stated that climate change would have little effect on production and predicted five percent yield increases or losses. In response

to extreme weather caused by climate change, farmers reported they would likely diversify crops, buy crop insurance, make modifications to their rental/lease agreements and possibly leave farming altogether. All states except Mississippi reported that they would not increase irrigation in response to extreme weather. A leader in the survey effort stated that "It may be advisable to just not mention 'climate change' when talking to farmers, but rather talk about how these mitigation and adaptation practices can economically benefit their operations."

GMO'S

A recent *Washington Post* editorial stated "genetically modified crops have increased productivity and improved the lives of farmers and people who depend on them." The editorial appeared after two Oregon counties voted to ban GMO'S. The editorial went on to say "there is no mainstream scientific evidence showing that foods containing GMO'S are any more or less harmful for people to consume than anything else in the supermarket, despite decades of development and use. If that doesn't convince some people, they have the option of simply buying food bearing the 'organic label.' There is no need for the government to stigmatize products with a label that suggests the potential for harm. Outright bans, meanwhile, are even worse than gratuitous labeling."

A recent study that included universities in Connecticut, Florida, Texas, Indiana, and Michigan found that nearly 20% of consumers don't know the difference between "local" and "organic" foods. The study also found that 22% of respondents said that "local" meant non-GMO. To add to the discussion, "interim" rules in Canada define "local" as food that is produced in the province or territory in which it is sold or food sold within 32 miles of the originating province or territory. Meanwhile, "organic" must meet strict USDA or similar Canadian Food Inspection Agency guidelines and then be verified by a third party. Organic essentially means it has been produced without synthetic inputs, i.e. sewage sludge or GMOS.

Certification Nation

By Dennis Berglund, CPCC-I
Centrol Crop Consulting

Professionals need to be certified! I have been a proponent of consultant Certification since the 1980's.

In 1995, qualified consultants were exempted from the WPS requirements, mainly due to NAICC's efforts. This WPS exemption applies to certified or licensed consultants and employees under their direct supervision. But now EPA is trying to restrict our exemption, so I think that this is a good time to review it:

Why did I become Certified?

- i) As professionals, we owe it to our profession and our growers to get Certified!
- ii) Licensing of consultants is not available in MN or ND
- iii) Certified crop consultants and their direct employees are exempt from all provisions of the Worker Protection Standards (WPS), except pesticide safety training
- iv) I have no ties to product sales, and I can certify my Independence through CPCC-I, which is important to me
- v) I take it as a personal challenge to be "as Certified as possible" and I have elected to be Certified in all 3 Certification programs, which are:
 - (a) CCA
 - (b) ARCPACS
 - (c) CPCC-I

How does Certification benefit me?

- i) Exemption from provisions of the Worker Protection Standards (WPS), except pesticide safety training
- ii) I estimate that our WPS exemption saves EACH CONSULTANT \$5,000-10,000 in unnecessary cost and inefficiency PER YEAR
- iii) At our company (Centrol Crop Consulting), we require a professional Certification and there are many of us that have more than 1 Certification

Of the three certifications, I consider NAICC's Certified Professional Crop Consultant (CPCC) to be the most rigorous, with these requirements:

- College Education
- 3 years of experience
- 36 CEUs per year
- Written exam
- Written case study
- Client references
- Pesticide safety training
- Code of Ethics
- Independence from product sales can be certified as CPCC-I

Lastly, if you are a professional crop consultant and are not certified or licensed, then you are probably breaking the law! You owe it to yourself and to our profession to become certified.

Delta AgTech Symposium in Memphis July 7-8, 2014

Demonstrations of Unmanned Aircraft for Potential Ag Uses

The Delta AgTech Symposium: Advancing UAVs in Agriculture, will be held July 7-8, 2014, at Agricenter International in Memphis, Tennessee. The two-day event will include UAV technology and flight demonstrations, speakers, and a trade show for organizations to share their knowledge and solutions. "Agriculture is expected to be the predominant user of these specialized aircraft when the FAA finalizes regulations for commercial use. Now is the time for agribusinesses and farmers to learn more and consider the important role this technology will play on farms in the near future," says Mike Karst, senior partner of event host company Entira.

Find more details, including a schedule of demonstrations and presentations and registration information at www.deltaagtech.com. Companies interested in sponsorship or exhibit details can contact Kelli Polatty at kpolatty@entira.net.

NAICC Apparel

Contact AllisonJones@naicc.org to order hats, vests and jackets. Please allow 4-6 weeks. All prices include shipping.



The following are in stock. Orders will be taken once inventory is depleted:

Khaki Hats (75).....\$21

Black Hats (13) \$21

Pink Hats (7) \$21
(photo not available)

Green Windbreakers... \$31
(3 XXL and 11 XL)
Close-out green style
no longer manufactured.

Vest (1) XXL only \$41
All other sizes can be ordered.



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