



National Organic Coalition

April 25, 2007

Mike Johanns, Secretary
United States Department of Agriculture
1400 Independence Avenue SW
Room 200A
Washington, DC 20250

Secretary Johanns:

The National Organic Coalition and the additional under -signed concerned organizations and individuals, wish to bring to your urgent attention our strong concerns regarding a recent announcement of the National Organic Program (NOP) policy regarding the potential for organic certification of Grower Groups (GGC).

At the outset, we would like to commend the NOP on taking necessary steps towards enforcement of USDA standards throughout the world in order to ensure the integrity of the organic label worldwide. However, we have concerns that a recent decision pertaining to an individual entity announces a fundamental shift of policy at USDA/NOP regarding the inspections and certification of Grower Groups.

Historically, certification agents have widely and successfully implemented GGCs for over a decade, as a method of providing access to the organic market for farmers from developing countries who have very limited financial resources. Products successfully certified organic under the GGC system include nearly all of the organic coffee and much of cocoa, teas, bananas, spices, as well as many other products. The retail market value of coffee alone is estimated to be between \$200-300 million USD. Chocolate and sugar together are conservatively estimated to be similar, with a combined estimated retail value of coffee, chocolate, and sugar equaling \$400 – 600 million USD.

The GGC system was designed and created before the existence of USDA National Organic Program and it is practiced under many international certification programs. GGC systems are recognized around the world in world-wide markets. Since 2002, the NOP has accredited organic certification agencies, many of whom certify grower groups. The NOP has accredited these agencies with full knowledge and approval of the GGC systems. The National Organic Standards Board proposed a guidance policy to address this issue in 2002, and the practice of certifying grower groups has, in fact, continued by USDA-accredited organic certification agencies without further clarification from the NOP since implementation of the USDA regulations in 2002.

The Grower Group Certification model has been utilized for farmers in developing countries who have very limited financial resources and is limited to farmers who have formed associations, cooperatives or other democratically organized groups. To qualify for certification as a Grower Group, the farmers must create an internal certification control system (ICS) which ensures that the entire group, as well as each participating farmer, complies with organic certification requirements. The purpose of this system is to aid those farmers who cannot afford individual certification, thus providing a valid export access for these farmers, often for the very first time. At the same time, the ICS seeks to provide consistent oversight for the group to verify compliance with strict organic standards and therefore preserve consumer confidence. Organic accreditors and certifiers must ensure that these ICS systems are fully functioning.

There appears to be some conflict with this type of practice and the existing NOP regulation, as interpreted by USDA (see USDA/NOP Adverse Action: Denial of certification, Appeal RULING: October 27, 2006). In this case, USDA denied certification of a Mexican operation due to noncompliance issues, and further stated that: “The ruling established that use of an internal inspection system as a proxy for mandatory on-site inspections of each production unit by the certifying agent is not permitted.”

Since this decision could have very significant economic impact on some of the world’s smallest and most vulnerable farmers, affect major US food industry buyers, and deny consumers access to numerous organic products, we urge the USDA to proceed carefully with any policy decisions only after considering alternatives and consulting in thoughtful and timely discussions with the wide range of potentially impacted stakeholders and program participants.

A critical first step toward making significant policy determinations like the USDA’s statement on GGC must include a public and transparent process. Further, the procedures for considering and taking action on such policies should be fully documented using the standard practices related to management of a Quality System for an accreditation agency. Given the fact that NOP does not have a Quality System in place, it is not surprising that problems have frequently arisen when NOP has made or revised policies related to its accreditation system.

We ask that any ruling on the eligibility of Grower Groups be delayed until NOP institutes a full-fledged Quality System consistent with the mandate at 7 CFR 205.509, which requires that the NOP comply with ISO/IEC Guide 61 (now revised and renumbered as ISO 17011, “Conformity Assessment—General Requirements for Accreditation Bodies Accrediting Conformity Assessment Bodies”).

In our view, compliance with this international norm will greatly improve the current method of making changes in accreditation requirements, as §8.2.4. of ISO 17011 requires accreditation bodies to “give due notice of any changes to its requirements for accreditation and take account of views expressed by interested parties before deciding on the precise form and effective date of the changes.” In addition, this international standard for management of accreditation bodies provides detailed and comprehensive requirements on such topics as:

- Acceptable structures of an accreditation body,
- Impartiality and confidentiality

- Accreditation activities
- Documentation of procedures, policies and standards of the accreditation body,
- Methods for developing, revising, and controlling documents,
- Recordkeeping
- Promptly identifying and correcting nonconformities in the accreditation body's management
- Managing accreditation personnel
- Ensuring that information about the management of the accreditation body is available to the public,
- Assessing applications for accreditation, performing audits, and making accreditation decisions,
- Ensuring continued compliance of accredited certifiers through reassessment and on-going surveillance, and
- Handling complaints and appeals.

Following the NOP's consultation with stakeholders, the National Organic Standards Board, and legal counsel, we fully support a very transparent and participatory process to develop further action with regard to GGC. This process should start with the comprehensive evaluation of the NOSB 2002 recommendations. The recommendations will need greater scrutiny and clarification to be widely accepted, but they serve as the appropriate beginning point for discussions. [Please see attached NOP statement and NOSB recommendations.]

Finally, and most urgently, USDA/NOP must ensure continued access to the US market for the current legitimately-certified and accredited GGC organic products in the stream of commerce while this problem is resolved. USDA should, of course proceed to fully audit, provide appropriate oversight and ensure confidence of all USDA accredited certifiers who are certifying fully functional and legitimate GGC systems

We look forward to your immediate response and to the positive resolution of this very timely and urgent matter,

Undersigned,

National Organic Coalition :

Steve Etka, Legislative Coordinator
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Rural Advancement Foundation International -- USA
Beyond Pesticides
Center for Food Safety
Equal Exchange
Food & Water Watch,
Maine Organic Farmers and Gardeners Association
Midwest Organic and Sustainable Education Services
National Cooperative Grocers Association
Northeast Organic Farming Association -Interstate Council,
Northeast Organic Farming Association of Connecticut

Northeast Organic Farming Association of Massachusetts
Northeast Organic Farming Association of New Hampshire
Northeast Organic Farming Association of New Jersey
Northeast Organic Farming Association of New York
Northeast Organic Farming Association of Rhode Island
Northeast Organic Farming Association of Vermont
Northeast Organic Dairy Producers Alliance
Union of Concerned Scientists

**** Please see below for additional Organizational and Individual Signatures**

Cc: Lloyd Day
Ken Clayton
Barbara Robinson
Mark Bradley

ORGANIZATIONAL/BUSINESS SIGN -ONS

492 Cafe
A Common Thread
A World Away
AeroStar Global Logistics
Agnus Dei Lutheran Church
Agora Ministry
Agricultural Missions
AgriSystems International
Agro Eco, The Netherlands
Akeley UMC
Alanheri (Produkten) BV - The Netherlands
Alberts Organics
Alpha Delta Omega
Alter Eco Fair Trade
ALTERNATIVA 3, S.COOP.CL
Alternative Grounds Coffeehouse and Roastery
Amnesty International at The College of New Jersey
Ancient Wisdom Publishing
APOYO Ministry
Appalachian Crafts Farm
ArtFarm
Ashland Food Co-op
ASOBAGRI, Guatemala
ASPROCAFE INGRUMA, Columbia
Atlas Coffee Importers, LLC
Backcountry Coffee Roasters
Bagel Grove
Barnard EcoReps
Be Ready for 2012
Beautiful Savior Lutheran Church
Beecher gelato & gourmet coffee
Belmont United Methodist Church
Berkeley Natural Grocery Company
Berkshire Co-op Market
Bethel University: World Challenge
Big Sun Music
BIO FOODS (PVT) LTD, Sri Lanka
Blossom Grocery
Blue Ridge Outdoors Magazine
Bonnie May's House of Praise
Brambleboro Food Co-op
Browns United Methodist Church
Bucks County Foodshed Alliance
CACVRA, Peru
Café Campesino
Cafes Finos de Exportacion S. de R.L., Honduras
Caffe Ibis, Inc. Coffee Roasting Company
California Council of Churches IMPACT
Camano Island Coffee Roasters
Cambridge Naturals
Campesinos Ecologicos de la Sierra Madre de Chiapas
SC, Mexico
Canandaigua Farmers Market
Canvas Canoe
Cayuga Pure Organics
CECOVASA Ltda., Peru
Celtic Viking Furniture
Centenary United Methodist Church
Center for Global Justice
Center for Muscle Therapy
CENTRAL COCLA LTDA., Peru
Central Co-op's Madison Market
Central de Cooperativas Cafetaleras del Norte,
CECOCAFEN R.L.,
Central Piurana de Cafetaleros - CEPICAFE, Peru
Centro Uruguayo de Tecnologias Apropriadas, Uruguay
Certified Naturally Grown
Chicago Fair Trade
Christ Lutheran Church
Christ United Methodist Church
Christus Victor Lutheran Church, ELCA
Church & Society Committee
Church of Christ at Dartmouth College
CIRSA S. de S.S., Mexico
COAINE, Bolivia
Coffee Exchange
Coffee Lab International
coffee-tea-etc, LLC.
Comercializadora Mexicana de Productos
Agroecologicos, Mexico
Community Alliance for Global Justice
Community CROPS
Companeros Cafe
CONACADO, INC, Dominican Republic
Concordia College Campus Dems
Conexion Ecologica
Connecticut Field Office--American Friends Service
Committee
Conscious Coffees
Co-op America
Cooperativa de Cafe Organico CECOCAFEN, Nicaragua
Cooperativa de Cafe Organico YUCUL, Nicaragua
Cooperative Coffees, Canada
Cooperative Coffees, USA
COOPESANTA ELENA R.L., Costa Rica
Copesanta Elena R.L., Costa Rica
Cornucopia Institute
Covenant Presbyterian Women
Creating your life path
Criewood United Methodist Church
Cultural Creatives In Action
Cupper's Coffee Co. Inc., Canada
Davis & Co., CPAs, P.C.
Dean's Beans Organic Coffee Company
Deer Run Bed & Breakfast
Desert Sun Coffee Roasters, Inc.
Diocesan Council of Catholic Women
Distribuidora Vida y Esperanza S.C, Mexico
Dominican Sisters
Doodads, Inc.
Downtown Community Fellowship
Druid Hills Baptist Church
Earlham Environmental Action Coalition
Earth & State
Earth Sisters of maine
EarthShare Gardens
East to West Gifts
Ecumenical Peace Institute/CALC
Edmonton Small Press Assn., Canada
El Cerrito Natural Grocery Company
Emanuel Lutheran Church, Manchester, CT
Emmanuel Lutheran Church, Livonia, MI
ENGAGE
EnvironGentle
Environmental Action Club of Skidmore College

Environmental Monitoring Group
 Equator Coffees & Teas
 Ethical Bean Coffee Co, Canada
 Ethical Impact, Inc.
 Eve Circle
 Fair Trade Advocates of KSU
 Fair Trade For All LLC
 Fair Trade Puget Sound
 Fair Trade Student Association, American University
 Fair Trade Winds
 Fair World Marketplace
 Faith Lutheran Church
 Faith United Methodist
 Family
 Family Farm Defenders
 FAPECAFES, Ecuador
 Federacion Indigena Ecologica de Chiapas SSS, Mexico
 Ferncliff Camp
 Fiddler's Dream Coffeehouse
 FINCA TRIUNFO VERDE, SOCIEDAD CIVIL, Mexico
 First Central Congregational UCC
 First Congregational Church
 First Lutheran Church & School
 First Parish Church, Concord, MA
 First Presbyterian Church, TN
 First Presbyterian Church, NY
 First Presbyterian Church, Stillwater, OK
 First Presbyterian Church, IA
 First Presbyterian Church, Lawton, OK
 First UMC of Union County
 First UMC of West Webster
 First Unitarian Universalist Church
 First United Methodist Church
 First Universalist Church
 Flamenco Organic Coffee Co.
 Flying Disc Ranch
 Food For Thought
 Food For Thought
 FoodWise Inc
 Forgotten Tails
 Forward Movement Publications
 Fountain of Life Ministries
 Fowler Camp and Retreat Center reformed church in
 america
 Friends Circle
 Friends of San Jose de Apartado Peace Community
 Ireland
 FUMCOG Bazaar
 Gardens by Laura
 George Washington University Students for Fair Trade
 Georgetown Solidarity Committee
 Georgetown Students for Fair Trade
 Gift & Thrift Inc.
 GLOBAL BEANS Coffee
 Global Connections
 Global Gifts
 Globus Coffee LLC
 Good Foods Market & Cafe
 Good Shepherd Lutheran Church
 Goodness Greeness
 Grassroots International
 Green Line Cafe
 Green Mountain Coffee Roasters
 Green Street monthly meeting
 Grounds for Change, Inc.
 Haley House, Inc
 Hands Around the World
 Hanover Consumer Cooperative
 Harvest Co-op Markets
 Hayes Valley Neighborhood Parks Group
 Haywood County (NC) Peace Fellowship
 Healing Innovations
 HEAR US Inc
 Heathcote Earthings, LLC
 Hebrew University Organic Co-op, Israel
 Hendersonville Community Co-op
 Heritage coffee company
 Hilton Presbyterian Church
 Hofstra's Environmental Law Society
 Holy Cross International Justice Office
 Holy Rosary Social Justice Committee
 Holy Trinity Lutheran Church
 Hope Lutheran Church
 Hosanna Harbors, Inc.
 House of Mercy
 Indiana Certified Organic, LLC
 Indiana's Green Network, Incorporated
 Indigenous Women's Initiatives
 Indigenous Women's Network
 Institute for Agriculture and Trade Policy
 International Labor Rights Fund
 interrupcion*
 Ithaca College Feminists
 joe --a fair trade coffee house
 JSL, SA de CV, El Salvador
 Just Coffee Cooperative
 Just Creations
 Just Food, NYC
 Justice Committee, Congregation of St. Joseph
 k.bach design
 Kankakee Natural Foods
 kenmore united methodist church
 KILIMANJARO NATIVE COOPERATIVE
 UNION(1984) LTD,
 Kind Coffee LLC
 Krisoker Saar (Farmers' Voice), Bangladesh
 La Chiwinha, Inc., Puerto Rico
 La Siembra Co-operative
 Lakewood United Methodist Church
 Land Management Partners
 Larry's Beans
 Level Ground Trading LTD, Canada
 Levelground Trading Ltd., Canada
 Lifeenergy, Jana Boggs,
 Linden Hills Co-op
 Living Wage Clothing
 Living Waters Community Lutheran Church
 Local Harvest
 Lookout Lodge, LTD
 Lutheran Campus Ministry at Denton
 Lutheran World Relief
 Make Now Count
 Mandala Tearoom & Apothecary
 Manos Campesinas, Guatemala
 Mayville United Methodist Church
 Mennonite Information Center
 Messiah Lutheran Church
 Michelle Jolivet Productions
 Michigan Java LLC
 Michigan Organic Food & Farm Alliance (MOFFA)
 Middelbury Natural Foods Cooperative
 Mississippi Market Natural Foods Co-op

Missouri Farmers Union
 Moorpark United Methodist Church
 Mount Eagle Christian Center
 Mount Olivet Lutheran Church
 mr. espresso
 Mugshots Coffeehouse & Cafe
 Mugshots Coffeehouse & Cafe
 Multinational Exchange for Sustainable Agriculture
 (MESA)
 National Campaign for Sustainable Agriculture, Organic
 Committee
 National Cooperative Business Association
 National Family Farm Coalition
 Nature's International Certification Services
 natures manna
 Nebraska Green Party
 Neighborhood Co-op
 Network for Business Innovation and Sustainability
 New Garden Community Church
 New Silk Road Marketing, LLC
 NH World Fellowship Center
 Northern Plains Sustainable Agriculture Society
 Nottingham United Methodist Church
 NYC Fair Trade Coalition
 Oberlin Student Cooperative Association
 OCIA International Inc
 Oké USA
 One World Artisans
 One World Handcrafts
 Open Harvest Cooperative Grocery
 Organic Agsystems Consulting
 Organic Consumers Association
 Organic Independents
 Organic Islands Promotions Ltd., Canada
 Organic Produce Wholesalers Coalition
 ORGANIC PRODUCTS TRADING CO
 OrganicUniverse.com
 Our Saviour's Lutheran Church
 Oxfam America
 Palms Westminster Presbyterian Church
 Paradise United Methodist Church
 Pathway Investments, LLC
 Pax Christi Springfield
 Pax Christi Western New York
 Peace and Justice Committee, Sacred Heart Catholic
 Church, Oberlin
 Peace Coffee
 Peace Presbyterian Church
 Peace with Justice Ministries, Nebraska Conference,
 UMC
 Peacemaking & social justice committee, westminster
 presbyterian
 Peak to Plains Alliance
 People's Health Movement USA
 Peoples United Methodist Church
 Planet Bean Coffee
 Plans and Solutions, Inc.
 Plowshare Center
 Polymeadows Farm
 Poolesville Presbyterian Church
 Port City Java, Inc.
 Presbyterian Mo-Ranch Conference Center
 Presbyterians For Restoring Creation
 Presbytery of Middle Tennessee Hunger Program
 Prescott United Methodist Church
 Princess Valiant Coffee
 Professional Creations, LLC
 Progressive Asset Management
 Provender Alliance
 Putney Consumers Cooperative
 Rainbow Place
 Rayjen Coffee Company
 Resurrection Lutheran Church
 Richland First Presbyterian Church
 Rico Latte, Inc
 Rising Hope UMC
 Rockport United Methodist Church
 Root Capital
 Roots Market
 Roots Market
 Rougemont United Methodist Women
 Royal Blue Organics / Cafe Mam
 Run for Africa
 S&S Center for Sustainable Agriculture
 Saint Isidore's Catholic Church
 San Francisco Urban Service Project
 Say It Records
 selene whole foods co-op
 Sequoyah United Methodist Women
 Seven Bridges Cooperative
 Seventh Generation Energy Systems
 Seward Co-op
 Shared Interest Society, UK
 Shepherd of the Mountains ELCA
 Sisters of Charity of St. Augustine Leadership Team
 Sisters of St. Francis
 SmartSprocket, inc.
 Smith Mill Creek Institute
 Social Concerns Committee of Sisters of Charity of St.
 Augustine
 Social Justice Alliance
 Social Ministry Committee, Grace Lutheran Church
 Society
 Sojourns
 Solor Lutheran Church
 Somos CaPAZes, Colombia
 Sources of Hope Gifts & Books
 South Africa, UKZN, Farmer Support Group, South
 Africa
 Spirit of Joy Lutheran Church
 St John's United Church of Christ
 St. Andrew's Social Justice Committee
 St. Hubert Peace and Justice Committee
 St. John's Evangelical Lutheran Church
 St. Joseph Community Health
 St. Mark's Lutheran Church
 St. Marys JPIC
 St. Matthew Trinity Lutheran Church Board of Outreach
 St. Matthew's United Methodist Church
 St. Paul's Lutheran Church
 St. Peter Lutheran Church ELCA
 St. Zepherin Church
 State College Presbyterian Church
 Sterling United Presbyterian Church
 Students for Fair Trade
 Sunnyside Presbyterian Church
 Sustain/FamilyFarmed.org
 Sweet Onion Food Co-op
 Sweetwater Organic Coffee Co. Inc.
 Sychar Lutheran Church
 synAIRgis, Canada
 Tanzania

Tatum Ventures
 Tea Howc
 Tea Promoters (India) Private Limited, India
 Ten Thousand Villages - Asheville
 Ten Thousand Villages - Ephrata
 Ten Thousand Villages Charlotte
 Ten Thousand Villages Grayslake
 Ten Thousand Villages Hagerstown MD
 Ten Thousand Villages Houston, Inc.
 Ten Thousand Villages in Evanston
 Ten thousand Villages Mishawaka
 Ten Thousand Villages Oak Park
 Ten Thousand Villages of Akron PA
 Ten Thousand Villages of Alexandria VA
 Ten Thousand Villages of Atlanta GA
 Ten Thousand Villages of Cincinnati OH
 Ten Thousand Villages of Dayton VA
 Ten Thousand Villages of Denver CO
 Ten Thousand Villages of Fort Wayne IN
 Ten Thousand Villages of Goshen IN
 Ten Thousand Villages of Greensboro NC
 Ten Thousand Villages of Greenville SC
 Ten Thousand Villages of Huron Valley
 Ten Thousand Villages of Kansas City Inc
 Ten Thousand Villages of Kearney NE
 Ten Thousand Villages of Lincoln NE
 Ten Thousand Villages of Little Rock AR
 Ten Thousand Villages of Media PA
 Ten Thousand Villages of Mishawaka IN
 Ten Thousand Villages of Montreat NC
 Ten Thousand Villages of Northampton MA
 Ten Thousand Villages of Raleigh NC
 Ten Thousand Villages of Richmond VA
 Ten Thousand Villages of Sioux Falls SD
 Ten Thousand Villages of Souderton PA
 Ten Thousand Villages, Pasadena
 The Brandermill Church
 The Bridge
 THE CHANGE strategy and design
 The Coffee Review
 The Democracy Center
 The Dessert Plate
 The EarthWard Project
 The Ecology Club
 the Fiberactive Quilt Company
 The Food Project
 The Green Chef Deli, Inc
 The Kobos Company
 The Nesting Grounds Coffee House
 The Peace With Justice Project
 The Porters & Importers Company
 The United Methodist Church
 The Work of Our Hands
 The World's Window
 Tierra Nueva
 Tradewater / Lower Green Rivers Watershed Watch
 Transfiguration Lutheran Church
 Trappe Landing Farm & Native Sanctuary
 TRIBAL GROUNDS Coffee Culture
 Trinity Lutheran Church, Chicago, IL
 Trinity Lutheran Church, Wauseon, OH
 Trinity Lutheran Church High School Youth
 Trinity United Methodist Church, Albion, IN
 Trinity United Methodist Church, Grand Island, NE
 True Roots
 UCC Women's Fellowship
 UCIRI, Mexico
 Uganda Agroforestry Development Network, Uganda
 Uganda Wildlife Authority, Uganda
 UMKC National Lawyers Guild
 Union de comunidades indigenas de la region del istmo
 UNION DE SOCIEDADES DE LA SELVA, SSS
 Unitarian Fellowship of Bennington, Vt.
 Unitarian Fellowship of Sarnia & Port Huron
 Unitarian Universalist Congregation of Venice, Florida
 Unitarian Universalist Fellowship of Bellport
 Unitarian Universalist Fellowship of Boca Raton
 United Church of Broomfield
 United Church of Christ in Abington
 United Church of Christ Justice and Witness Ministries
 United Methodist Women
 United Methodist Women First U.M.C.
 United Parish of Upton
 United Presbyterian Church of Sterling
 Unity Temple
 Universidad Nacional Agraria La Molina, Lima, Peru
 Untours
 Upper Valley Food Co-op
 UU Church of Boulder
 Veritable Vegetable
 Vermont Artisan Coffee & Tea
 Veterans for Peace, Oberlin
 VillageWorks, Inc.
 Viroqua Food Coop
 Wagner Bros. Apple Orchard
 Wagner Bros. Apple Orchard
 Walnut Creek United Methodist Church
 Washington DC Fair Trade Coalition
 Washington Lutheran Church
 Weavers Way Cooperative Association
 Wedge Community Cooperative
 Wedge Coop
 Westover Hills Presbyterian Church
 What in the World
 Whitecliff Vineyard
 White Dog Cafe
 White Dog Cafe Foundation
 Whole Foods Community Co-op, Inc.
 Whole Foods Cooperative
 Williamsburg Unitarian Universalists Church
 Wilson Memorial High School's Chapter of the National Honors
 Winona United Methodist Church
 Women in Black-Evanston
 Women of Hope Lutheran Church
 Women of the ELCA NWL Synod of MI
 Women's Int'l League for Peace & Freedom, Mary Wood branch,
 World Craft & Cafe, Inc. T/A Pangea
 World Wildlife Fund
 Worldly Goods
 York United Methodist Church
 Your Words' Worth
 Ypsilant Food Cooperative
 Zeitgeist Gallery

INDIVIDUAL SIGN-ONS

Tyler Abbott	Laura Anderson	Danielle Ball	Jeremiah Belanger
Qasim Abdul-Tawwab	Antonia Andreoli	Laura Ballantyne	Sarah Marie Belcastro
Deborah Abramsky	Andy Andres	Irene Ballas	Mara Beldavs
Maria-Viktoria Abricka	Jane Andrews	Michael Balonek	Sarah Belfort
Maher Abunamous	Joe Andrews	Mike Balonek	Jessica Belich
Doria Acheson	Irene Angeletti	Ranan Banerji	Karin Bell
Roxanne Acosta	Jasmine Angelini-Knoll	Maggie Bangser	Susan D. Bell
Rose Addington	jeff angell	Bobbi Barbarich	Bryan Bell
Sarah Adkins	Erin Ankrum	Catherine Barber	Emily Bell
Charles Adkins	Jay Anton	Hannah Bardin	Lana Bellah
John Adriko	Marilyn Antonik	Arthur Bardos	Dawn Bellemare
Jane Affonso	Clarice Antwi-Obimpeh	Christine Barilla	Melissa Benbow
Susan Aguilar	Amelia Apfel	Andrew Barilla	Mark Benbow
Rivkeh Ahmad	YVONNE	Katherine Barlett	Carole Bencich
Gretchen Aikman	APPELTANS	Jesse Barlow	Lyla Bendsen
Brian Albert	Linda Arble	Linda Barnes	Melanie Benesh
Gloria Albrecht	jason ardelean	Jereme Barnes	Diane Bennett
Mary Albrecht	Ron Arm	Rebecca Barnes-Davies	Mica Bennett
Ann Albrecht	Elisa Arond	Benjamin Barnett	Debra Benson
david Albright	Lauren Arrington	Rachel Teadora Barnett	Chris Benson
Victoria Albright	Paul Aschebnbrenner	Mark Barnett	Meighan Bentz
Mary Ann Albright	Dick & Mary Ashbrook	Robin Barr	Gordon Benzer
Gina Alacruz	David Askuvich	Samantha Barron	Andrew Benzer
Lynne Aldrich	Elke Aspillera	Anna and Doug Barsotti	Valerie Berg
Amelia Alexander	Dwight Aspinwall	Lauren Barthel	Lisa Bergstresser
Matthew Alexander	Gayle Aspinwall	Danielle Bartholomew	John Berman
Joanna Alexander	Joyce Athey	Doris Barton	Timothy Bernard
Andrea Allegrezza	Hays Atkins	Martha Barton-Rivera	Gary Bernard
donny allen	Craig Auchter	Patricia Bartoshevich	Connie Beroza
Jeff Allen	lisl auf der Heide	Karl and Evelyn Bartsch	donald berry
Deborah Allen	LIndsey Aull	Ronald Barus	Kimberly Berry
Gordon Allen	Karen Auyeung	Shawna Batchelor	Mary Anne Berry
Joli Allen	Kristina Baade	Bruce Batchelor-Glader	jacqueline berry
Rev. Dr. Judith Allen	Beverly Babcock	tovia bat-leah	PHILIP BERRY
kay allen	Kathleen Babe	Gary Batty	Tara Betts
Kate Allen	Nicholas Babin	Sylvia Batty	Jennifer Betz
Suzanne Allison	Ann Babyak	Denise Bauer	Tom Beutel
Belinda Allison	Kurt Bachmann	Rob Baum	Liz Beyers
Robin Allman	Chris Bacich	Donna Baum	Gaura Bhakta
Chris Allred	Faith Bade	Diane Bauman	Debra Biba
Emily Alp	Mollie Bady	Marie Baumel	Michael W. Bible
Janet Alspach	Crystal Bae	Sarah Baumert	Jericho Bicknell
Scott Althoff	Fritz Baesman	WILBUR BEACHY	Marije Bijdevaate
Martha Altom	David Bahn	Buddy Bealer	Christine Binder
Charles Alvarez	Betsy Bahn	Tara Bealer	Kate Bishop
Mane' Alves	Ian Bailey	Thena Beam	Jami Blaauw-Hara
Christian Amani Ya	Eli Bailey	Megan Beaman	Edith Black
IGUGU	Aaron Bair	Andrea Beaman	Patricia Black
Paul Amundsen	Russ Baird	Gretchen Bearce	Liane Blad
Nikhil Anand	DeAnna Baird	Katherine Bearce	Dorothy Blair
Al Anctil	Emilie Baird de Vargas	Shelly Beard	Thomas Blair
Kathleen Anderson	sharon bakay	Susan Beck	Blair Blaisdell
Lisa Anderson	Ellen Baker	Jolene Beckman	Susan Blandford
Michael Anderson	Jennifer Baker	Mary Ann Bede	Steven Blank
Rachel Anderson	Marilyn Baker	David Beeman	Cecilia Blasco
Gene Anderson	Carolyn Baldwin	Debbie Beeman	Marla Blaser
CHristine Anderson	Shannon Ball	Jack Behl	Marla Blaser
Ian Anderson	NANCY BALL	Olga Beirne	Deborah Bliss

Beth Blissman, Ph.D.	Abigail Breuer	Lynne Burns	kathryn cartledge
Noah Block-Harley	Richard Brewer	JERRY BURT	Adrienne Casadaban
Deborah Block-Schwenk	Betty Brickhouse	Kyra Busch	Jorge Casale, Argentina
Kevin Block-Schwenk	Heather Bridges	Derek Busch	Dana Caspersen
Ro Bloom	Jeremy Brigham	Kara Bush	Millie Caspersen
John Mark Blowen	Cassandra Brill	Joanne Busiel	Rosario Castellon
Jeanine Bloyd	Tim Brill	John B. Butler	Dean Castillo
Janaki Blum	Zachary Brines	Dr. Thomas W. Butler	Francesco Catania
Ronni Blumenthal	Katrina Brink	andrea butler	Steve Cato
Don Blust	Dalmazio Brisinda	Katherine Butt	Laura Cavin
Alex Boates	Andrea Brock	Martin Butts	Abby Cawiezell
LORETTA BOBER	Eric Brodbeck	Ole Bye	Gina Cawley
Eliza Bober	Pamela Brody	Doug Cadmus	shirley cecconi
William Bode, Ph.D.	Mary Brody	Amy Caes	Angela Cenzalli
Michelle Bodle	Mélanie Broguet	Erynn Calderwood	abigail chambers
terry boisclair	Ramon Brongil	Frances Caldwell	mark champlin
Verna Boland	DENISE	Carl Caldwell	Ken Champney
Jerónimo Bollen	BROOKHOUSE	Joanna Caley	Aaron Chan
Stephen Bolton	RUTH BROOKS	William Calfee	Vivek Chandler
Bob Bomar	Berry Brosi	Judy Calhoun	Donald Chandler
Alex Bomstein	Dan Brown	Judy Calhoun	Marlene Chandler
Sandra Bondarchuk	Susan Brown	Mimi Calhoun	Sivakumar Chandran
Rhonda Bonfield	Sanya Brown	Larry Calkins	Scott Chaput
Gerry Bonfiglio	Shelley Brown	Ramana Callan	James Charles
Tracy Bonham	Susanna Brown	Mona Callan	Jennifer Charles
Jennifer Bonkowski	Charles Brown	Michelle Callanan	Kevin Charles
Karie Boone	Jessica Brown	Brendan Callanan	Joe Charles
Timothy Borah	Rev. Meredith Brown	Sylvia Callaway	Glenn Chase
Jillian Borchard	Curtis Brown	Caroline Campbell	Preena Chauhan
Paul Bordoni	Pat Brown	Jenna Campbell	Michele Chavez-Pardini
Nancy Borkman	Katherine Brownell	Diana Candida	Yolanda Chen
Elisa Bosley	Bob Bruett	Janice Cannistraro	Dia Cheney
Julie Bossler	Connie Bruins	Jeffrey Canter	Jean Cheng
Jennifer Bothell	Jennifer Brunelle	Maureen Capillo	Ann Cherin
K Boudreau	Jinn Brunk	Kathleen Cappellano	Sondra Chesler
David Boulanger	tom brunno	John Caraluzzo	Carla Cheuvront
Norm Bourg	Jill Bryan	Myke Cardosi	Ron Chew
Anne-Marie Bourque	Robert Buchele	Valerie Carlisle	Anita Chiappetta
Karen Boutet	Lee Buck	George Carlisle	Judith Chiarito
Catherine Bouzide	Louise Buck	Christine Carlsen	John Chodacki
Deke Bowman	Peter Buck	Jeremy Carlsen	Gary Chorpensing
Elizabeth Bowman	Jonathan Buckley	Judy Carlsen	maryanne chrisman
Belinda Box	mary buckwalter	Jackie Carlson	Kathleen Christian
Evan Boyd	Phyllis Budne	Kris Carlson	Jasmin Chua
Shawn Boykins	Kent Buhl	Pam Carlson	Ann Church
vanessa bradby	Melonie Buller	James Carlson	Dianne Cinnamon
Greta Bradford	Eric Bullock	Sarah Carmen	raina clark
Cindy Branch	Roland Bunch	Joe Carney	Tracy clark
Hillel Brandes	Michael Bundock	Marian Caroselli	Heather Clark
Carol Brandyberry	Juli Burden	Laura Carpenter	Tamera Clark
Jessica Branham	Robert Buren	Jordan Carpenter	Terrie Clark
Sue Braun	Adam Burk	nuala carpenter	Kevin Clark
Christine Braun	Donna Burke	Susan Carr	Sarah Clark
Carolyn Braunius	Gina Burkhardt	David Carr	Erik Clarke
lucinda bray	Linda Burkholder	Audrey Carrel	Rita Clarke
Brooks Bray	Joyce Burkholder	Kathleen Carriere	Chelsea Clarke
Michelle Brechtel	James Burks	David Carroll	Marcla Clarke
Kristen Bredenbeck	Bonnie Burleigh	Elizabeth Carroll	Susan Clasen
Mayer	David Burnham	Casey Carter	diane clayton
John Brenner	Rebecca Burns	Dave Carter	Barbara Cleary
Zoe Brent	Robert Burns	John Carter	Cathy Clemens
	Shelli Burns	Michelle Carter	Bob Clemens

Steve Clemens	Dominique Cortara	Rita Danks	Aimee Denette
Katie Clement	Kathy Cory	Sean Dannen	tyler dennison
Charlie Clements	Robin Corzilius	Niamh Darcy	Eva Denny
David Clewell	Agnieszka Couderq	Lawrence Daressa	Tera Dent
Richard Clough	Agnieszka Couderq	Billie Darling	Greg Deresinski
Donna Coale	Alice Coulombe	Sarah David	ELISE DERIEL
Carolyn Cobb	Kenneth Courtney	Heydemann	Debra Derksen
Susan Cockrum	Katherine Coury	Benji Davidow	Brandy Deroche
Andy Cockrum	James Covert	Gloria Davidson	Amy Derrick
Sarah Cockrum	Allison Covey	sarah davidson	Melissa DeSa
gary coenen	Beth Covington	denise davies	Jim Desmond
Catherine Coffey	Debbie Cowherd	Jan Davini	Nancy DeStefano
Daniel Cohen	Chris Cowles	Joyce Davis	Barbara DeVeau
Eric Cohen	Stephen Cox	Camilla Davis	Edie Devine
Janna Cohen-Rosenthal	Paula Cox	Ashley Davis	Karla Devine
Marcus Cohn	Katherine Coyle	Tessa Davis	Wendy Dewberry
Sonya Cohn	Andrew Craig	Debby Davis	Dennis Dewey
Joan Colborn	Barbara Craig	Allison Davis	john di ruocco
Joan Colborn	Jennie Cramer	Elizabeth Davis	Juan Diaz
Randy Colby	Jacqueleine Cramer	Adriana Davis	Rebecca DiBennardo
Gail Colella	Kim Crane	Rose Marie Davis	James dickert
Sarah Alice Coleman	Scott Crass	Carol Davis	Torry Dickinson
Daniel Coles	Julie Craves	Jean Davis	Hesper Dickson
LEAH COLLINS	Janette Crimmins	Janet Davis	Helen Dieter
sharon collins	David Crisp	jt davis	George Dietrich
Johnny Colon	Betsy Crofts	Meghan Davis	David Dietz
Gretchen Colonius	Tanya Croke	Carla Davis	P. Dilling
anthea colossio	Alice Cromwell	Elizabeth Davis	Nickie Dillon
Sarah Colson	Mary Crooks	Donald Davis	Dennis Dillon
Jessie Comba	Nan Cross	Cynthia Davis	Douglas Dirks
Addie M Compton	Andrew Crouth	Galen Davis	Rita D'Isidoro
Victoria Compton	Vivian Crouth	Megan Davis	Ross Dixon
Jessica Concepcion	Gerald Crouth	Ken Davis	Jim Dixon
Dorothy Connelly	Brian Crouth	Aaron Dawson	Susan Dluz
Patti Conner	Clint Crowe	Judith Day	stephanie dobroski
Melinda Conning	Erbin Crowell	tom dayton	Kristin Dobson
Kevin Connors	Maximo Cubilette	Kathy de Cano	Allison Dolan
Charlene Conrad	Lisa cullen	James de Haan	Elaine Dolcich
Keziah Conrad	Cindy Cumming	Adela De La Santos	Max Doldes
Kenneth Conrow	Amanda Cunningham	Aaron De Lazzer	Mj Donahue
Margaret Conrow	Margaret Curnow	Michelle Dean	Roy Donkin
Judith Converse	Joe Curnow	Jill Dean	ANTOINETTE
Stephen Converse	Mary Curran	Molly & Gordon Dean	DONLEY
Claudia Conway	Bechi Currier	Barbee Dearborn	Jamie Donne
Tom Coogan	Theodore Curtin	Jacqueline DeCarlo	Kris Donnelly
Charlotte Cook	R Cusanelli	Mo DeCoursey	Mary Donnelly
Marylou Cook	Carol Cybulska	David DeFebo	Katherine Donnelly
Emma Cook	B D	Angela DeFelice	Susanne Donoghue
Jonathan Cook	BeBe D.	Diane DeFranco-Kling	Lisa Dordal
David Cook	Elizabeth Dachowski	A. DeFreitas	Michelle Dorime
Laura Coolidge	Alyson Dagang	Gary and Connie	john doucet
Kathy Coonrod	Katie Dahl	DeGrote	Brian Dowd
Em Cooper	Gloria Dahle	Lee DeHaan	Molly Dowell
Dennis Cooper	Katie Dahlseng	Marie delaHoussaye-	Meredith Dowling
Beth Cooper	michael daly	Diaz	Sean Doyle
Stacey Cooper	Kate Damon	Max Delaney	Allison Doyle
Dunya Cope	Barb Damon	Juliette Delfs	Scott Dozier
Adam Copeland	andrew danforth	Heather Dell	Crystal Dozier
David & Susan Corbin	Noel Danforth	Mike DeLonay	Patricia Drake
Caitlin Corner-Dolloff	Stephanie Daniels	Linda Demas	Kate Drennan
Katherine Correa	Stephanie Daniels	Dale DeMott	Joseph Driscoll
Kate Corrigan	Melissa Danielson	Joan DeMuth	Daniel Driver

Damien Droney	Julienne Emry	Phil Ferris-Smith	Ivy Foster
Loryane Drumheller	V Eng	Mark Fetzko	Donna Foster
Anne-Marie Dubeau	Lois Engelman	Eric Feustel	Rachel Fouche
Mike Ducheneau	Rose Ericson	Julia Field	Katie & Rick Fournier
Devon Ducheneau	Richard Ericson	Henry Fielding	Sierr Fowler
Betsy Ducote	Howard Erskine	Sue Wagner Fields	Maryann T. Fox
Carol Duffe	Heather Erzen	Henry Fieldseth	Juanita Fox
Beverly Duffield	Barbara Escobar	Mike Filippelli	Jill Fox
Sandra Duggan	susan esrey	Dustin Finer	James Foxvog
Randy Dumornay	Cindy Esselstyn	Thomas Finger	Michael Foy
gabriel duncan	Erica Esser	Jill Fink	Deborah Fraize
Katherine Duncan	Julie Etheredge	Audrey Finkbiner	Eric Frame
Lisa Dunn	Judith C. Etheridge	Jeff Finkbiner	Anne Frances
Heather Dunn	Donald Evans	Bryson Finklea	Sara Frank
Aleta Dunne	Kelsie Evans	Ruth Fink-Winter	Gregory Franklin
Cecilia Duran	Shirley M. Evans	Becky Finley	Lucy Franks
Dirk Durant	Kim Evans	Carrie Finley	Mary Frantz
Naomi Durant	Greg Evans	Eileen Fiorito-Noll	Andy Frantz
Connie Duras	David Evans	Michael Fischer	Rick Frazier
Renee Dwyer	elizabeth eve	Helen Fischer	Jonathan Freedman
Sam Dyck	Beverly Everett	Anne Fisher	Sara Freeman
Evelyn J. Dymkowski	Kyra Evers	Carolyn Fisher	Kirsten Frei-Herrmann
jamie easley	Kit Everts	Ellen Fisher	Melanie Freisinger de
Lisa East	Hamilton Everts	Robert Fisher	Gonzalez
Anastacia Easterling	Joshua Evilsizer	Margaret Fisher	Meredith Friedman
Susan Eby	Roxane Ewert	michael fisher	Shelley Friedmann
Patrick Ecclesine	melody faber	Lois Fisher	Karla Friesen
Don Ecklund	Chris Fabian	Robert Fiske	Anni Friesen
Sarah Edelman	Gail Fahy	Gray Fitzgerald	Marlene Fritz
William Eden	Debbie Fain	Cindi Fitzgerald	Thomas Fritzsche
ADRIAN EDGAR	Christa Fairbrother	Kerisa Fitzgerald	James Froelich
Elain Edge	Charles Faivre	Charlotte Fitzgerald	Nicholee Froese
Nora Edison	Cameron Farlow	Mary FitzGibbons	Helen Froese
Steven Edlin	Ellen Farmer	Annika Fjelstad	Arnold Frogel
Judith Edlin	Wendy Farmerie	Steven Flachbart	Jay Frost
Naomi Edlin	Eugene Farrell	William Flaherty	harah frost
Marie Edmonds	Katie Fasse	Shannon Flam	Don Fuller
Jesse Edmonds	Donna Fast	Bradley Flamm	Alan Fullerton
Ross Edsall	Ken Fast	Susan Flegle	Joan Fumetti
Jeanne Edwards	Emma Faulkner	barry fleischer	Lee Gable
Carla Edwards	Joshua Faulkner	Polly Flint	Betty Gabrielli
Raymond Edwards	keith faustel	J Kimberly Flisrand	aj gadgil
Paul Eid	Casey Fay	Stanley Florek	Gauri Gadgil
Maria Eife	William Feeney	bonnie flory	Mary Ellen Gadski
Carrie Eikler	Jessica Feeser	Sr. Evelyn Flowers	Anne Gagnon
Margaret Eilerman	Kathleen Fekete	ROBERT FLOWERS	Judith Gaietto-Grace
Ann Eisenlord	Diana Felber	Bridget Flynn	Susan Gallagher
Elisabeth Ejupovic	Rebecca Feldman	Walter Fogg	catherine gallogly
Donna Ekstrand	Jim Feldmann	Alice Foley	Pamela Galpern
Michole Eldred	cherie feller	Adrienne Fong	Ryan Galt
Jane Elfring	Marjorie Felton	kathy fontana	Juan Pablo Galvan
Tawny Elgatian	Robert Fenichel	Rafael Fontes	Denise Garchow
Jennifer Elliott	Maureen Fenlon	Christy Foote-Smith	Jennifer Gardner
Marlene Elliott	Abigail Feresten	Judith Fordham	Gregory Garland
rhian ellis	Princess Ferguson	Sheila Foreman	Bill Garlette
Elizabeth Ellis	Evelyn & John Ferguson	FRED FORSBERG	Sharon Garner
Kaganzi Elly Mwesigwa	Angela Fernandez	Kim Fortin	Heather Garrison
Sarah Ely	Margarita Fernandez	Susan Fortina	Jennifer Garrison
Leslie Emerson	Adria Fernandez	nicole fortunato	M. Garski
Mary Emerson	Marc Ferrara	Rich Foss	brian Garvey
Brian Emerson	Brenda Ferree	Seth Foster	Bernadette Gaskin
Lauran Emerson	Joan Ferris	Heather Foster	June Gaudreau

Susan Gaugler	Dorcas Good	Jody Gust	Nelda Hartwig
Edith Gause	Kerry Goodhope	S. Marie Gustafson	Eleanor Harty
James Gauthier	Gary Goodman	Gwen Gustafson-Zook	Danielle Hartzell
Ivy Gauvin	J. Dary Goodrich	Susan Gustner	Betty Hartzler
Anne Gavitt	Ian Gordon	Karen Gutierrez	Carolyn Harvey
kate gavora	Adam Gordon	Glenn Gutterman	Wednesday Harvey
Tricia Gdowik	Nick Gorski	Desiree Guzman	Mary Harvey
Duane Gebhard	Gloria Gorton	Sergio Guzman	Ben Hastil
Mike Geldart	Douglas Goston	Alex Gyori	Jane Hatley
Kathy Gemar	Caroline Gottschalk-	Marjorie Habenicht	Linda Hatton
Zachary Gendron	Druschle	Ingrid Haeckel	Tessa Hauck-Reed
Josephine Genovese	francs graham	Hannah Hafter	davin haukebo-bol
Daniel George	Peter Graham	lindsay hagamen	Christie Hausman
Catherine George	James Gramlich	Beth Hagberg	Wanda Havard
Robert Gerner	Mary Grant	Eileen Haggerty	Carolyn Hawk
Michael Gerrish	Sheryl Grant	JACQUE HAGMAN	Kate Hawkins
Judith Gerstein	L Grant	Lorri Hagman	Claire Hay
Arthur Getz Escudero	Dean Grantham	Girma Hailu	Timothy Hayes
Douglas Geyer	Kathryn Gravel	Nancy Hale	Coriene Hayes
Elizabeth Ghormley	Zena Grecni	Maggie Hall	Judith Hazelton
Michael Giammalvo	Jody Greco	Jill Hall	Mary Jo Hazlett
Bethany Giammalvo	Jonathan Green	C Hall	claudette head
Jennifer Giancola	Elizabeth Green	Tom Hall	david headly
Matthew Gibbons	ken green	Doug Halloran	Robert Healy
Rachel Gibson	Charlie Green	Laurel Halter	Maryellen Healy
Kate Giguere	Marge Green	carole halvornon	mary healy, rsm
Heidi Gilbertson	Joanna Green	Raleigh Hamm	Kate Hebdon
Richard Giles	Marilyn Green	Josephine Hamm	Tatiana Heflin
Elizabeth Gilfert	Cory Greenberg	Ralecia Hamm	Sarah Hefner
Judy Gillan	JANELLE GREENE	stuart hammerle	Shelly Heideman
Patricia Gillis	Kathryn Greenwood	Amy Hammond	Ann & Dick Heidkamp
Samuel Gilman	Amy gregg	Amy Hamrick	Emily Heim
Tana Gilmartin	Margo Gremmler	Barbara Hanks	Kimberly Heindl
Juanita Gilmore	Melissa Grese	Nancy Hanks	Pamela Held
David Gilruth	sandra gresham	Linda Hanley	Randi Helder
Carla Gilruth	Jacob Grier	Rachel Hanlon	Amanda Hendler-Voss
Aaron Gingerich	Pamela Grier	Joan Hanrahan	Joyce Hendley
Amy Ginn	Cynthia Griffin	Jo Ann Hansel	Diana Hendricks
Debbie Gioia	Susan Griffith	Kevin Hansen	robert hendricks
Bernard Gitonga	Leigh Griffith	Mary Hanson	Shelley Henke
Lisa Giusti	Fred Griffith	Cynthia Hanson	Kay Henning
Linda Glasier	Barbara Grilley	Vicktoria Harbison	Lois Henricks
Rick Glassman	Bill Grimes	Dr. Mary E Harder	Stefanie Henrie
William Glenn	Barbara Grimsley	myron hardesty	Brooke Hentz
Carl Glenn	Howard Grinager	jack hardman	jane herbert
Bruce Glick	Karen Grinager	JOHN HARDY	Robert Herdt
Susan Glick	Rebecca Grodofsky	Kathy Hardy	lucie herman
Gwen Glowaski	Leon Grodski	Kim Hardy	Ron Hershey
Janet Goble	Steve Grody	Kathy Harget	Charles Hershey
Connie Godjikian	Gideon Grody-Patinkin	Will Harlan	Tom Hessel
Carlene Godwin	Isaac Grody-Patinkin	Terry Harmon	Keziah Hess-Klopp
Karen Goedeken	Bob Gross	Maggie Haroldson	RQ Hettrick
Sr. Sara-Barbara Goggin	anna lisa gross	Thomas Harp	laura heverling
Molly Golando	Chessa Gross	Erin Harrell	Kate Hibbard
Taif Gold	Debra Grove	Erin Harrington	Matthew Hickman
William Goldberg	Nancy Grove	Karen Harris	Frank Hicks
Alison Goldberg	Edward Grove	Don Harris	Jessica Hiemenz
Jeffrey S. Golden	Barb Guenther	Donal Harris	Wendy Hiett
Miriam Goler	Melissa Guerin	Janet Harris	Kari Higdem
Jonathan Gonsky	Jennifer Guilford	Avery Hart	Alan Hightman
Mark Gonsky	Joyce Gulliford	Emily Harting	James Hilburger
Michelle Good	Barbara Gunsel-Mearns	Marie Hartmann	Doris Hildebrand

Kathleen Hilimire	Mary Howe	Christina Jeffries	Cynthia Katsarelis
Tim Hill	Barbara Howell	Mark Jenkins	Heather Kattan
Madeline Hill	Eleanor Howell	Masry Alice Jennings	Noah Kauffman
Deborah B. Hill	Virginia Howell	Lois Jensen	Joy Kauffman
Aaron Hill	Amanda Howland	Bev Jester	Marc Kaufmann
Betty Hilliard	Leonore Hoyt	Jennifer Jindra	Ellen Kaufmann
James Hilton	rivka hozinsky	Mary Jirmanus	Maude Kaufmann
Dr. Rita Hindin	Teresa Hufford	Carrol Johnson	Kristen Kavic
bonnie HInshaw	Brendan Hughes	Anita Johnson	Karen Kay
Roland Hinz	Dean Hulse	Jonell Johnson	James Kay
Mary Hitt	Kathryn Humiston	Nancy Johnson	jonathan kaye
JoBeth Hitt	Rita Hummel	Bob Johnson	Laurie Kazemian
Joana Hively	Heidi Hunt	Mary W Johnson	Taber Keally
jen hoban	Merilyn Hunter	Kevin Johnson	Susan Keays
Morgan Hobbs	Jamie Hupfer	Greg Johnson	James Keefer
Nicole Hobson	Jamie Hupfer	Alicia Johnson	Julie Keefer
Harry Hochheiser	Christy Hurst	Maryann Johnson	Lisa Keegan
Christine Hodgdon	Karen Hurych	Susan Johnson	Martha Keeler
Chris Hodge	Susan Husa	Jolene Johnson	Geri Keeler
Suzanne Hodgkins	Chris Huskey	Siegfried Johnson	Hali Keeler
Mary Alice Hodgson	Tanvir Hussain	Pat Johnson	Jonathan Keeler
Carli Hofferber	Jason Hutchins	Kirste Johnson	Emily Keeler
Rose Hoffman	faith Hutchinson	Allison Johnson	Mary Keelty
Carol Hoffman	kate hutton	Dana Johnson	Suzanne Keenan
Lilly Emily Hoffman	kathy hyatt	Christy Johnson	Joseph Keesecker
Beatrice Hohenegger	E Hysten	Stephen JohnsonGrove	Kate Keib
Rachel Hokanson	Karin Hyler	Jason Johnston	Robert Keim
Tom Hokanson	Allison Iacocca	Kerry Jones	Robert Keim
Joan Hokanson	Elizabeth Icenhauer-	Julia Jones	Patty Keipfer
Jill Hokanson	Ramirez	Justin Jones	Suzanne Keleher
Jennifer Hoke	Lara Iden	kevin Jones	Richard Keleher
Bentivogli	CK Iezzi	Patricia S. Jones	Kevin Keleher
Wanda Holcombe	Norio Ikeda	Warren Jorenby	William Kell
Gary Holden	Nona Ikeda	ira josephs	Rori Kelleher
Janet Holden	George Imhoff	Peters Joshua	Jessica Kelley
Moria Holland	Ruth Ingraham	Aaron Joslin	Michael Kelley
Greg Holland	David Inouye	Monica Jossart	Vanessa Kelly
Matthew Holland	Brian Inouye	Jared Jost	Rev. Mary Kelly
Laurence Hollander	Joan Ireland	Siel Ju	Amy Kelly
Laura Hollender	faith irie	David Judd	Ann Kelly
Kevin Hollender	Maureen Irvin	Christopher Judge	Danielle Kelly
Jennifer Holliday	Marsha Irwin	Leah Juhl	Joshua Kelly
Anna Holloway	Robin Irwin	Omar Juma	Colleen Kelly
Megan Holmberg	Denise Ivy	Sam Jun	Marianne Kemp
Lori Holmertz	Raj Iyengar	Jacob Juncker	Kathleen Kenealy
Cathy Holt	Allison Jack	Jacob Jurmain	Joseph Kennedy
Will Honeycutt	Carrie Jackson	Harrison Kahn	Susan Kenney
Trinity Honse	Paula M. Jackson	Michael Kaiser	Dan Kenney
Robert Hooker	Lisa Jackson	gwen kaiser	Bridget Kent
Megan Hope	Eileen Jackson	Dean Kallas	Steve Kerchner
John Hope	Britt Jacobsen	Kathleen Kallhoff	Maggie Kerr
John Horn	Steve Jacques	Noah Kalos	Edwin Kessler
Julie Horne	Daniel Jaffee	Carol Kandiko	Susan Kester
Julie Horvath	Todd Jailer	Madeline Kane	Jason Ketola
Dawn Hosick	Kate Jamal	Michael Kanter	Mary Keyes
Gregory Hostetler	wendy james	Sara Karimi	Gloria Keyser
David Houser	Rob Janson	Shireen Karimi	Leah Khaghani
Pat Houwers	Beryl Jantzi	Nisa Karimi	Deepak Khandelwal
David Hovde	Katherine Jaramillo	Gregory Kasper	sanjay kharod
Katherine Hovick	Janet Jastram	Sonia Kassambara	Lexi Ki
Kristin Howard	Stephanie Jedlicka	Julie Kates	Patrick Kidd
Mildred Howarter	Michael Jeffery	ellie kates	Myrna Kidd

Richard Kidd	Sandy Krell-Andre	Stephanie Laurenzo	Barbara Link
Tom Kiely	Julie Kremer	Kathy Lawrence	laura linklater
Shern Kier	Selman M Kremer	Dave Lawrence	Brad Lipovsky
Mary Ellen Kiesner	Michael Kreyche	Susan Lawson	VARA LIPWORTH
Masumi Kikkawa	Tammy Kreznar	Stan Lawson	Joan Listen
Sue Kilgore	Matt Krick	Stanley Lawson	Hope Little
David Kilgore	Sue Krueger-Koplin	Donald Leach	allison little
June Kim	judith Kruger	Julie Leach	Amy Little
Elaine Kimzey	Froukje Kruijssen	Sandra Leahsong	Lisa Littner
Debra King	Catharine Krupp	Marilyn LeDoux	Jo Litto
Ben King	Yu-Lin Kuang	Lisa Lee	Laura Litwiller
C. Kinton	Michael Kubera	Christine Lee	Ben Liu
Kirill Kireyev	Paula Kuhns	Thomas Lee	Peggy Liversidge
Cindy Kirk	Dawn Kulczynski	Erika Lehmann	Martha Livingston
Roger Kirkby	Donald Kuntz	Tamara Lehr	Christine Lizzi
Everett Kjellquist	Tammy Kuntz	Karen Leiter	Caroline Lloyd
Beverly Klassen	Jacek Kuzniar	Michael Leiter	Jennifer Lo
heatherjoy Klein	Brian Kvistad	warren leitzel	Elsa Lobo
Nancy Klein	Jennell Kvistad	elizabeth leiwe	Sharry Lockhart
barry kleiner	Christine Kwok	Nicola Lemay	Paul Loeb
Jen Kleinman	Sheila La;wson	Jodi Lemcke	Linda LOeber
Philip Kleisler	Jonathan LaCrosse	Randi Lenander	James Loersch
Mary Lou Klene	James Laesch	S Lennon	Janette Loersch
Joel Kline	John Laesch	Allison Lennox	Kristen Lofstrom
Judy Kline	Danielle Lafond	Margaret Lenox	Bonnie Lofton
Craig Klopfleisch	Karen Laforge	Mihcael Lent	Kathryn Lohre
Basey Klopp	Heather Laing-	Diane Leo	Kevin Lolack
Andrea Knezevic	Obstbaum	Kerri Leo	Linda Lombardo
Carol Knolle-Faulkner	timothy laird	Lydia Leon	Rusty Long
Julia Knott	Casey LaLonde	Patricia Leonard	STEVEN LONG
Inge Knudson	Susan LaMarche	Craig Leonard	Cindy Long
John Knuerr	Danielle LaMarre	angela leone	Andrew Long
richard kobernuss	David Lambert	Eileen Leslie	Christopher Long
Kathleen Koch	Laurel LambertSchmidt	Bonnie LeValley	Cheryl Lopez
Constance Koch	mary rose lambke	Jason Levine	Richard Lopez
Jodi Koeman	Alena Lamirato	Jessica Leving	Louise Lopman
Leah Koenig	Jane LaMotte	John Lew	Mary LoPreste
Aundra Kohlbeck	Bekkah Lampe	Thomas Lewinski	Kimberly Lord Stewart
Judette Kolasny	Julie Lampe	Mia Lewis	Andrea Loubier
Lauralyn Kolb	Julie Lampie	Jodi Lewis	Joyce Loudon
Karen Kolberg	Constance Lancaster	Summer Lewis	Corlee Louder
Nicholas Kolivas	Rodney Landis	Katrina Lewis	Kathy Love
Kathryn Kolly	James P. Lane	Bruce Lewis	martha love
Akino Komazaki	Janice Lane	Tony Li	Wendy Low
airric konecny	Alan Lane-Murcia	Barry Lia	Leslie Lowder
Natasha Kong	Nancy Lang	Dolores Liamba	Guinnevere Lowe
Elizabeth Koontz	liz langrall	Judy Liang	Briana Lowrie
Michael Korach	Kimberly langsfeld	Laurent Liberge	chris lowry
Meghan Kosowski	Joseph L. Lapp	Dorothy Liddel	Geoffrey Lowther
Ray Koytcheff	gail larkin	Ed Liddell	Brianne Lozier
Constance Kozel	Steve Larrick	Robin Lieberman	Fredric B. Lozo
Eve Kozenko	Nancy Larsen	Elizabeth Liebert	Emily Lubcke
Tom Krahl	Deborah Larson	Diane Liebeskind	Connie Lucas
Jonathan Kratz	Gary and Carolyn	Jennifer Lien	Jill Lucht
Jeanette Kraus	Larson	Stacey Lienemann	Heather Luedtke
Jonathan Kraus	Garold LaRue	Judith Lienhard	audrey luethy
James Krause	Michele Lastovica	Alex Liffick	Peggy Lunardini
Leah Krauss	Jane Lattimore	Donna Lightbody	Matthew Lund
Joseph Krawetz	Marie Latulippe	Carrie Lilligan	sean luse
Meribeth Kraybill	Andrea Lauer	Diana Lim	Dan Lush
Rainer Krell	laura laughnan	Christine Lim	Jillian Lush
Tobin Krell	Ayers Lauren	Dee Lindblom	Oumou K. LY

Diana Lynch	William Martin	MaryAnn McDowell	Allentza Michel
James Lynch	Jamila Martin	Katherine McEachern	Selma Milchen
Katie Lynch	Andrea Martin	Krisitn McFarland	Jeff Milder
Logan Lynda	Seth Martin	Ethan McGaffey	Denise Miles
Janalyn Lynne	Emily Martin	Peter McGahan	Kate Miles
seth lytle	Rose Martin	Marietta McGannon	steve miller
Anna M	Carra Martin	Robin McGee	Jo Ann Miller
Michelle Ma	Ruth Martin	Robert McGill	Sue Miller
Brian Mabry	Sylvia L. Martinez	Pat McGovern	Gregg Miller
Kris MacCallum	ARi Martinez	Brynne McHugh	Ted Miller
Megan MacDowell	Kathleen Martinez	Elliot McIntire	Julie Miller
Kaitlin MacKenzie	Alice Marzolf	Marina McIntire	Robert Miller
Janet Mackey	Nicole Mason	Hal McIntire	Kandy Miller
Daniel MacPhee	Chris Mason	Laura McIntyre	Judy Miller
Julie Macpherson	Charlotte Mason	Nancy McKee	Jesse Miller
Arienne Macy	Barbara Massy	Patricia McKenna	Jen Miller
L.K. Macy	George Matanic, O.P.	Carol McKeon	Whitney Miller
Ryan Macy-Hurley	Gail Matheson	Laura Hart McKinny	Jenna Miller
Lea Mahan	Ronald Mathsen	Megan McLaurin	Rhea Miller
Matthew Maher	Tara Mathur	Lynn McLean	Linda Miller
Timothy W Maher	MK Matson	Michael McLean	ann miller
Timothy Maher	Monica Mattar	pam mclendon	Gloria Miller
Jack Mahoney	Jean Matthews	Sean McMahan	Rolland Miller
Margaret Mahoney	Kate Matthews	Bryn McMahan	Erin Miller
abdellilah mahtat	LARRY MAUPIN	Sara McMillan	Janet Miller
Julie Major	Brooke Maura	Marion McMillan	Kathleen Miller
David Makar	Sharon Maust	ian mcmillan	Danielle Miller
Jessica Maki	Patricia A. Maxson	Dawn McMullan	lynn miller
Martha Malloy	Robert Maxson	Jennifer McMullen	Mary Miller
Emmey Malloy	Susan May	HEATHER MCRAE	David Miller
Moira Malone	Edward Mayer	Mary McRae	J. Eric Miller
Ann Malone	brandie mayes	Lisa McSain	Susan Miller-Stigler
Linda Maloney	Monica Maynard	Elizabeth McWhirter	Elena Miller-ter Kuile
Caitlin Maloney	celia maynard	Sharyn McWilliams	Michael Milleston
Susan Mamich	Kelly Maynard	kim meadows	Pamela Milliken
Karena Man	almon mayze	Kathleen Meagher	Wendy Mills
Julie Maney	Michel mazza	Rachel Medema	Arthur Mills
Sheila Mann	Jamie McAdams	Kathy Medtie	Katie Mills
Alma Manney	Kelly McAnerney	Mary Meehan	Janis Miltenberger
Kathryn Mansfield	jackie mcbee	Susan Meeker-Lowry	Rox Minaya
Prabha Manuratne	James McBride	Anurag Mehndiratta	Gladys Minaya
Melody Manwaring	William McCaffrey	Laura Meisler	Mary M Miner
Angela Marchant	Meg McCall	santiago mejia	Jennifer Miner
Tod Alan Marcinek	Carey McCallum	Andrea Mekshes	Barbara Miner
Demetrius Marcoulides	Penny McCanles	Hilary Melcarek	Christopher Miner
FAYE MARCUS	Karen McCarthy	morgan melchiorre	Ivan Mintchev
William Marion	Bridget McCauslin	Sherry Melecki	Sharon Miranda
Denise Marion	Margaret McClory	Stephanie Menaker	Gil Miranda
Brad Marion	Barrie McClune	Joan Mencher	tania mireles
fleming markel	Terence McCormally	Elissa Mendenhall	Eleanor Miroslaw
Edward markham	Jessica McCormick	James Mercer	Anne Misak
Jill Markstein	Michelle McCotter	Lucy Mercer	Nathan Mishler
Ryan Marnell	Carolyn McCoy	Liz Merchant	Mary Mitchell
Renie Marsh	Patti McCreddie	dean merrill	Patti Mitchell
Corliss Marsh	Jennifer McCullough	Mark Merrill	Mary Mitchell
Shannon Marshall	Laura McDaniel	Sarah Mertz	Donna Mitts
Stacy Marshall	Chris McDevitt	Stella Mestre	Lori Moak-Kean
Kelsey Marshall	Matt McDevitt	Barbara Metivier	Robert Moczulewski
Keith Marshall	Maura McDonald	Nicole Metz	Della Moen
julian marszalek	E McDonald	Benjamin Mew	Renee Moffett
Lisa Martin	Kim McDonald	Kathleen Meyer	Al and Ann Mojonnier
Laura Martin	James McDonald	kathleen mezik	Sara Moledor

Jerry Moles	Romy Myszka	Molly Norton	Brian Otwell
Rev Barbara Molfese	Joe Naftel	Mildred Nosko	elizabeth overstreet
Vanessa Moll	Marjorie Nafziger	James Novakowski	Sharean Oxley
Stephen Mollins	Mechthild Nagel	Dennis Novotny	Richard Pace
Rafael Montealegre	Sharon Nagle	Susan Nowalis, RSM	Richard Padgett
Lisa Montelongo	candace nagle	James Noyes	Julia Padgett
Nicole Montesano	Jeanette Nakada	jennifer nunes	Meri Page
F Montgomery	Rajae Nami	Eric O.	Shelly Page
Allen Moody	Rose Nankya	tristin oates	Genevieve Pahos
Kathryn Moody-Arndt	Robert Napier	Tim Oates	Barry Paillet
Melissa Moon	Guillermo Narvaez	Joshua O'Bannon	James Paisley
Kim Moor	Liz Nash	Karyn OBeirne	John Palla
Shannon Moore	Carolyn Nash	Genevieve Obermeyer	Blanche Palm
Anni Moore	Jason Nassichuk	Maryann O'Brien	Michelef Palmer
Carlos Morales	Mayda Nathan	Melissa O'Brien	Debbie Palmer
Elaine Moran	Catherine Nathan	Kevin O'Brien	Janice Palmer-Tarbox
Sue & Bill Morgan	Brook Nauta	Brian O'Connell	Manisha Pandita
Merri Morgan	Melanie Neal	William O'Connell	David Papineau
gavin morgan	Laurie Neal	Sudie Lea O'Connor	Jeanne Parent
Beth Morgan	Natalie Neal-Peters	Roberta O'Connor	Peter Parente
Sigi Moriece	Megan Nedzinski	Charlotte Oda	Shannon Paris
Kathleen Morkert	chuck nelson	Shobu Odate	tamara Park
William R. Morris	Susan Nelson	Frank O'Dell	Nick Parker
Paula Morris	Andrea Nelson	Sandra O'Dell	Joe Parker
Julia Morris	William Nelson	Kurt Oelschlager	Jill Parker
Robert Morris	Holli Nelson	Lorelei Oelschlager	Jolene Parker
Reba Morris	Joan Nemann	Richard Offhaus	Nathaniel Parker
Daniel Morrissy	Kenneth Nesper	Claudia Ohler	Sara Parks
Betty Morrow	Heidi Ness	Sheila OKeefe	Lauren Parnell
michael moser	Terje Ness	Barbara Okerberg	beatriz pasos
Martha Mosinski	Leslie Newcombe	Ruthie Oland	Christine Pasour
keith motola	Irl Newham	Keith Olcott	Akta Patel
Barbara Mourouzis	Sally Newman	Morris Older	Betty Patrick
Laura Moy	Peggy Newsome	Douglas Olds	Nancy Patron
Bonda Moyer	Jim Newton	Karen O'Leary	Donna Patterson
Bonnie Moyer	Siphelo Ngcwangu	Vince Olin	Scott Patterson
Alice Mroszczyk	Anne Nguyen	Candis Oliver	Ken Patterson
Jennifer Mueller	Shawn Nichols	michael olker	Naarah Patton
Becky Muhs	Katharine Nicholson	Kathryn Olsen	Margaret Paul
Douglas Mullin	Sadie Nickelson-	Sharon Olsen	Allan Paulson
Sheila Mullineaux	Requejo	Sharon Olsen	Jacob Pavlak
Sarah Munroe	David Nicol	Eric Olsen	John Pavlik
barb murdock	Anne Nicol	Estelle Olson	Mary Pawlowski
Brian Murphy	Elenute Nicola	Victoria Olson	Brandy Payne
Michael Murphy	Jessica Niederer	philyss olson	Stacey Peacock
Meaghan Murphy	Judy Niednagel	Kathy Olson	Stacey Peacock
Lauren Murphy	Sue Niewiarowski	ana o'neil	Valerie Peck
Thomas Murphy	Lisa Nigro	Shawn O'Neil	Leslie Peckham
Virginia Murray	Anthony Nigro	Tom Opacki	Carl Peetz
Jen Murray	kim nigro	S O'Rourke	Ilse Peetz
paul murray	William Nirote	Johnette Orpinela	Lisa Peifer
Jeanne Murtagh	Robert Nix	Coralys Ortiz	Mary Pelkey
Lina Musayev	Lynda Noel	Cindy O'shay	sandrah Pena
Douglas Muschett	Jason Noel	Ginger O'Shea	Michele Pena
Karen Muse	Emi Noguchi	Daven Oskvig	Mark Pendergrast
Elaine Mushtare	Shari Nokes	Jon Ostendorff	Gail Penman
Tad Mutersbaugh	sheila nollen	Anne Ostroff	Adam Penn
Rachel Mutterperl	Patrick Noonan	Joanne Otieпка	Pat Penner
Walter Mycoff	Nancy Nord	Constance Otradovec	Michal Penniman
Liz Myers	Julie Norman	Mark Ott	Melinda Pensinger
Erin Myers	Kevin Norris	Helen Ott-Brasch	Yasmine Perez
Gertrude Myrick	Rodney North	Phillip Otterness	Antonio Perez

Scott Perez	Jacob Pratt	Dia Redman	George Robinson
Bettina Perillo	Tina Price	John Reed	Julia Robinson
Mary Perkins	Glenn Price	Ginger Reed	Susan Robinson
Heather Perry	Linda Price	Preston Reeve	Laura Robinson
Polly Pershing	Michelle Price	Greg Regaignon	Maya Robinson
Betty Person	Mark Price	Dara Regaignon	Anne Robison
Roxanne Perucca	Nancy Priest	lynn reha	Robin Robison
Sarah Peterman	Linda Primeaux	Nicholas Reid	Linda Robshaw
George Peters	Esther Prins	Sarah Reiling	Diane Roddy
Marti Petersen	Jenny Pronto	Mary Reilly	Wendy Rodewald
Arthur Peterson	Jo Prostko	Tom Reilly	josie rogers
Leroy Peterson	Dennis Proulx	yoni reinberg	Marie Rodichok
Lenore Peterson	Lucy Pryor	Chrstitine Reiner	jose rodriguez
Stacey Peterson	Melissa Puckett	Carrie Reinhardt	Gabrielle Roesch
amy peterson	James Puffer	Michael Reinhardt	David Rohrer
Idelle Peterson	Sue Pukall	John Reinhardt	Jose Luis Rojas
Mary Peterson	Burt Purrington	irit reinheimer	Erin Roland
Constance Peterson-	Minna Pyhala	Lori Rendina	Helen Roland
Miller	Susan Quaintance	k rengert	marya Roland
Linda Petkunas	Sue Quarto	Amanda Respess	Pablo A Roman
Nay Petrucelli	Gerhardt Quast	Roleene Reyes	Jennifer Romolini
Rick Peyser	Meghan Quillen	Margot Reynolds	Deborah Roose
cf phillips	Jean Quinn	Emily Reynolds	Richard Rortvedt
Martha Phillips	Susan Quintana	tara reynolds	Jennie Rose
Wendy Phillips	May Quintero	Linda Rhead	Lindsay Rose
Ted Phillips	Erin Quirk	Leslie Rheinlander	Amanda and Ryan Rose
Mary Lou Pieczarka	Kathleen Quirk	Marie Rhoades	Leigh Rosenberg
Jessica Piedra	Kathleen Quirk	Elva Rhodes	Andrew Rosenthal
Deborah Pierce	Carrie Rabideau	marla rhodes	Kerry Rosenthal
Lauren Pincus	Erin Racine	Vivian Rice	Barbara Rosholdt
Cheryl Pinzino	megan radder	Christine Rice	Rachel Rosner
Dan Pitt	Robert Radek	WILLIAM RICH	Cara Ross
Ron Pitts	Christine Radi	Jenni Rich	Charlie Rossiter
Rebekah Pitts	Stephanie Radi	Ann Richard	Cindy Rossman
Stephen Plant	Hannah Radke	Camille Richard	lada rossmeissl
Levi Pleshe	Heather Radl	Cindy Richard	Brian Rotach
Davd Ploskonka	Pam Raffensberger	Cheryl Richards	Jen Roth
David Plunkett	Christine Rainville	Terry Richards	Julie Roth
Melissa Poehnert	Ethan Rainwater	Peter Richards	Joseph Rotondo
Timothy Pohlhaus	Julie Raish	LaVonne Richardson	Elizabeth Rotundo
Rich Pokorny	Susan Rak	Mary Richardson	Marjorie Rowe
Ben Polly	Elizabeth Rakocy	Susanne Richter	James Rowland
Jessica Ponnath	Balasubramanian	Sarah Ricketson	Lynnae Ruberg
Angela Ponte	Ramani	ROBERT RIDEOUT	Michael Rubin
marian pontz	Joshua Ramisch	Catherine Rieley-	Victoria Rubley
Kalista Popp	Carol Ramsey	Goddard	Janna Rudler
Patricia Pora	Jason Ramsey	Rachel Riely	chris ruiz
Dan Poresky	Louise Ranck	Joe Riemann	Angelika Rumberger
Mayra Porrata	Jennifer Rankin	Kaitlin Rienzo-Stack	Aimee Rusch
Rebecca Porter	Anita Rapone	Jordan Rifis	Greg Rush
Kathleen Porter	Sanginee Rattan	Judy Riggle	Tyler Russell
Clifford Porter	Elizabeth Rauh	Chris Rimmer	Pauline Russell
Christopher Post	Priya Raveendran Pillai	Sarah Rinsema	Francis X Russo
Karen Povec	Whitney Ray	Hannah Rittenhouse	Dan Ruth
Marge Powell	Anita Rayburn	Cory Ritterbusch	Patricia Ruth
Alison Powell	Alex Rayman	Hugh Roberts	Janet Ruthowski
Sumer Powell	Elora Raymond	Jay Roberts	Jennifer Rutledge
David Powelson	Laura Raynolds	Martha Roberts	Carlos Rymer
Helene Powers	Maureen Readinger	Jennifer Roberts	nancy sabattini
Maggie Powers	Rebecca Rebmann	Jessika Roberts	Karel Sahlberg
Laura Pratt	Perry Recker	Linda Roberts	Dan Sal
Maija Pratt	Carol Recker	Michelle Robinson	Mauricio Salcedo

Kathy Salmon	Bryce Schrecengost	Patricia Shearin	Nancy Smith
Sue Salmon	Barbara Schrecengost	Corey Sheehan	Oliver Smith
Marcia Salner	Ruth C. Schreiner	Susan Shelley	Wendy Smith
Anna Marie Saltzman	Kimberley Schroder	Lorraine Shelly	Lyndsey Smith
Nancy Salvaggio	FrankLyn Schroeder	Gail Shemo	Sean Smith
Julie Salzmann	Eileen Schuhmann	Janet Shenk	Pandea Smith
Kelly Sammis	Scott Schul	Victorine Shepard	D Smith
Jamie Sammis	Karen Schulte	Ellen Sherby	jessica smith
Lauren Samuels	Paul Schultheis	Shannon Sheridan-	Nicole Smith
Yoshiro Sanbonmatsu	Darryl Schumacher	Geldart	diane smith
Barbara Sanborn	Anne Schutter	barbara Sherman	Michael Smith
YENA SANCHEZ	Joan Schwager	Susan Sherman	Margaret Smith
Shelby Sanchez	Allison Schwartz	Sue Sherman	Caroline Smith
Leo Sanders	Jeffrey Schwarz	Sharon Sherman	Holly Smith
mark sanderson	David Schweickart	Julia Shields	Tiffani Smith
Robert Saper	Dorothea Schweitzer	Amanda Shimko	Erin Smith
Janet Sappington	Kristen Scopinich	Janet Shirey	Chad Smith
Tarver-Wahlquist Sarah	Amy Scott	carolyn shohet	Eric Smith
Andrew Sargent	Diane Scott	Amber Shomo	Mendy Smith
Nancy Sarver	Alexis Scott	Briggs Shore	Randy Smith
Marieke Sassen	Margaret Scott	Shiva Shrestha	Pamela Smith
Ellen Satre	Anna Scott	Pete Sibley	John Smith
Barry Satterthwaite	Wes Scott	Leslie Siebert	Susan Smith
Alysa Sauder	Eric Scott	Jean Siegfried	judith smith
Kenneth Sauer	Marla Scriptor	David Siegler	Catherine Smith
Adam Savanick	Ethan Seaberg	Kim Siemers	Donald Smith
Merry Sawdey	BETH SEARCEY	Elena Sierra	Frances Smith
martha sawyer	Marianne Searfoss	shane sigler	Natalie Smith
Dana Saywell	David Seaton	Lita Sila	Edward Smith
Molly Scalise	Valerie Secaur	Lucille Silvester	Jody Smith Williams
Saundra Scarce	amy seek	Marian Simion	Shelley Smothers
Lori Scassera	Adrian Segar	Sandra Simmons	Eli Smucker
Katie Schaan	Rebecca Seguin	Jason Simmons	Sara Snider
Katie Schaefer	Lauren Seippel	Susan Simon	Jim Snider
Adam Schaeffer	Nancy Selinger	deborah simone	Dana Sniezko
David Schaich	Helen Sells	Pat Simons	Sarah Snyder
Nancy Schalles	Barbara Senn	virginia simons	Rebecca Snyder
Ben Schapiro	Irene Senn	Brent Simpson	David Snyder
Matt Schardt	Arek Ser	Rhonda Sims	Glenn Sohm
Carol Scheer	Kathleen Sercu	Keely Sinclair	Elizabeth Soileau Acton
Russell Schenck	Dennis Setera	Joel Singley	Howard Solomon
Devin Schenk	Sharad Seth	Joanne Singrey-Johnson	Dana Solomon
Sandy Scherer	Jeanne Setnes	Alex Sircy	David Solow
David Schilling	Ted Settle	Colleen Skeffington	Christopher Solt
Meagan Schipanski	marion settle	Rebecca Skiba	Rebecca Sommer-
Margot Schips	Thomas Seufert	Susan Sklar	Petersen
Carol Schirch	Susan Severin	Jay Slack	Chris Sonne
Diane Schlacter	Mary Jo Seward	Karen Slawinsky	Naomi Sonne
Chris Schlacter	Michelle Sexton	Lynn Slifer	Luis Sostre
Judy Schlueter	Rena Shaffer	Cecelia Smaha	Michael Soto
David Schmalbeck	Carol Shaffer	Simone Smith	Heather Souare
Denise Schmidt	Christina Shahriari	Mary Agatha Smith	Terri Spaeth-Merrick
Jay Schmidt	Katherine Shakelton	Hank Smith	Terri Sparenborg
Brandi Schmidt	Stephanie Shandera	Frank Smith	Nina Spaziani
Barbara Schmitt	Marcia Shantz	becky smith	Richard Speich
Mary Schmuck, RSM	Tamar Sharabi	Kristi Smith	Carol Spencer
Emily Schnee	Bill Sharbono	Chris Smith	Dennis Spisak
liz schnee	Sara Sharpe	Isaac Smith	Gail Spitzer
Casey Schneider	Joni Shavlik	Barbara Smith	Laura Spitzfaden
Emma Schneider	Raymond Shaw	Kellie Smith	Michell Spoden
Derek Schoepf	Susan Shaw	Jan Smith	Suzanne Sprague
Donna Schramm	Katy Shea	Dianne Smith	Leah Sprain

Michele Spring-Moore	William Stolicny	Thomas Taylor	Michael Tracy
Jeremy Sprinkle	Adam Stolorow	Julie Taylor	cheryl traylor
ERWIN SPRUTH	Carmalena Stoltzfus	Cathy Taylor	Scott Treiber
SOMASI SRINIVAS	Judith Stoltzfus	David Taylor	Bob Treitman
Balaji Srinivasagopalan	Peter Stone	Joan Taylor	Erica Trevizo
Evelyn St. Amanat	Emily Stone	J Taylor	Ann Trigg
Jennifer St. Clair	Patricia Stone	LJ Taylor	Andi Trindle
Belinda St. Leger	DEBRA STONE	Alicia Taylor	angela trivonovich
Jennifer Staff	Joyce Stone	Mary Adele Taylor	Victoria Trujillo
Elizabeth Stagl	Mindy Stone	John Tebben	Paul Trunnell
Elizabeth Stagl	George Stone	joan tedeschi	Anna Tsing
Wanda Stahl	J. Stone	Susan Teitelman	Suresh Tumkur
Louise Stahnke	Lee Stookey	amy tejchman	Patricia Tummino
kathryn stallard	Carol Stouder	Hannah Temple	Laura Turiano
Desiree Stammitti	Deena Stous	Suzie Terrell	Linda Turk
Richard Stammitti	corrie stout	Suzanne Terry	Warren Turner
Joseph Stanforth	Jane Stowe	Jerold Terry	Jane Gower Turner
Tina Stanley	Bea Strattnr	Diana Terry	Catherine Turner
Linda Stanton	Margaret-Cliff Strem	Dianne Thayer	Jennette Turner
Eleanor Stanton	Fred Strickhouser	The Verley Family	Quinton Turner
Larry Stark	George Stritter	Janice Thies	Donald Turner
Zeus Stark	Erika Strobel	Krista Thomas	Cynthia Turner
Rick Stark	Margaret Strock	Lisa Thomas	Mark Turney
Judy Starkweather	Eliza Strode	Simon Thomas	Nancy Turyk
Sarah Stayer-Clarke	Ron Stroholic	Kristen Thomas	Lois Tustison
Nigel Steel	Daniel Stroup	Carol Thomas	Rich Tuttle
tyler steele	Jennifer Stroup	clayton thomas	Chrys Tuttle
Tim Steele	Kathy Strunk	Tricia Thomas	Barbara Tuttle
Jeffrey Steen	Tes Strunk	William Thompson	Clarence Tuttle
Rick Stees	chris stuesser	Juliet Thompson	Sarah Twomey-
ben stefonic	Cassandra Suarez	Jamie Thompson	Mercurio
Robert Stegmann	Lubna Suboh	Meredy Throop	David Tybor
Adam Steinberg	Amy Sullivan	Paul Thur de Koos	Alfons Uellenberg
Carol Steiner	Nancy Sullivan	Michael Thurmond	Les Ulm
Albert Steiner	Steve Sullivan-Lanphier	Mary Thursby	B D Ulmer
Vera L. Steiner	Mary Lou Surgi	H. David Thurston	Molly Unruhe
Rosemary Steinmetz	Glenda Survance	Jesse Tichenor	Gloria Utzig
Schaunel Steinnagel	Daniel Susman	Brian Tierney	Michael Vacanti
Sara Stender	stephanie sutton	Peter Tierney	Adrienne Vacanti
Ray Stephens	Seth Svaty	Matthew Tiffany	Elizabeth Valdivia
Kay Stephens	Michelle Swaim	Kim Tilford	jessa valentine
Johanna Stephnson	Christopher Swain	Greg Tilley	Alberto vallejo
Kevin Stetson	JoEllen Swaine	Holly Timberlake	Eric Van Loon
Amy Steve	Joseph N. Swanson	Jo Tito	Barbara Van Reed
Skye Stevens	Sandra Swayze	Priscilla Titus	Kevin Van Slycke
Mary Stevens	jay sweeney	Robin Todd-Lee	Anne Van Willigen
Marilyn Stevens	Valerie Swift	Damian Tody	Minka vanBeuzekom
jill stevens	Regina-Wink Swinford	Jill Tolbert	Lisa Vandegrift
Deborah Stevenson	Sheryl Swink	Jessica Tolbert-	Kim Vander Yacht
Kiri Stevenson	Betty Sylvestre	MacIntosh	Margo Vanderhill
Valerie Stewart	laura sympson	Ralph Tomlinson	Stanley VanderKlay
Susan Stewart	karen taff	Richard Tonachel	Barbara VanderKlay
Kathryn Stewart	Ralph Tafoya	LAWRENCE TONZI	Elizabeth Vanderveer
Elizabeth Stich	Catherine Talano	catherine toomey	Marjorie Vandervoort
Catherine Stieg	Carolyn Talarr	Sue Torfin	mary vandevander
Ken Stigler	Shirlee Tan	vic torrisi	Annie vanDyke
Trina Stitak	Ona Tannehill	Gregory Tourian	Ahmee Vang
Betsy Stites	Dan Tanner	Maura Tourian	Robert Vann
Matt Stivers	Michelle Tanner	Maureen Towey	Becky VanNote
Paula Stober	Chris Tanner	Amber Townes	Jason VanNote
Leslie Stoeckle	David Tatgenhorst	corinne townsend	Nancie Vanture
Jonathan Stoetzer	Bonnie Taylor	Andrea Traber	Helen VAnvick

matt vargas	Tim Watson	Cheryl Willems	Sarah Workman
Evan Variano	Helen Payne Watt	Nelson William	Clifford Workman
yvette vasquez	Bonnie Weaver	Patricia Williams	Kathryn Worley
Karen Vater	Gayle Webber	Mary Williams	Ruth Worman
Stephanie Vaughan	Lawrence Webber	Cathi Williams	Holly Worthen
Kat Vaughan	Leonard Weber	Karla Williams	Joan Worthen
Lucile Vaughn	Margaret Weber	Molly Williams	Heidi Worthen Gamble
Daniel L. Veatch	MJ Weber	Brent Williams	Jerry Wrenn
Drew Veeneman	Alison Weeks	Alexandra Williams	Kay Wright
Donna Veeneman	Susan Wege	Sarah Williams	Robin Wright
Peter Velthuizen	Michael Weigel	Cathy Williams	Edward Wright
Kris Venne	Nancy Weinstein	Alistair Williamson	Dustin Wright
nora vera-godwin	Judy Weintraub	The Rev. Susan	Susan Wright
Camilla Verret	Michael Weintraub	Williamson	carolanne wright
maureen vetter	Linda Weiss	David Wilsey	Karen Wulff
Kimberly Vetter	Anne Weiss	Adrian Wilson	Jonathan Wynne
Debra Viele	Celene Welch	Tim Wilson	Esther Wyss-Flamm
Anna Vijayan	Malia Welch	Roselyn Wilson	Tara Xavier
sylvia vikingstad	John Welch	Sarah Wilson	Steve Yacik
Angela Villarreal	Marguerite Wells	Laura Wilson	Jennifer Yantachka
Mariel Villere	JOAN WELLS	Bradley Wilson	David Yates
patricia vincent	Jordan Wells	Arron Wilson	Aspasia Yeager
Lauren Vining	Carolyn Wells	Randy Wilson	Donald Yerhot
Peter Vitale	Kelly Wendland	Janet Wilson	Marilyn Yoder
Dina Vitantonio	Sherry Wenning	Justine Wilson	Nancy Yoder
Daphne Vlassis	Rachel Wentworth	Joyce Winebrenner	Clara Yoder
Martha Voigt	Kim Westermann	Douglas Wingeier	Melissa Yoder
Grace Voorheis	Kurt Weyhrich	karen winn	Rebeca Yoder
Mary Vorndran	stephen wheat	Amy Winters	Pat York
Murielle Vrins	mary wheeler	Kristin Wirth	Ray Yost
Visnja Vujica	john wheeler	Amy Wisehart	Dianne Yosua
Aleeza Wachs	vicki whicker	Alix Wisser	garland young
Donna S. Wagahoff	Kathleen Whidbee	Tamara Withers	Marie Young
James Wagner	AnneMarie Whildin	Stacey Wittig	Carrie Young
Tom Wagner	Robynne Whitaker	Evelyn Wohlens	Margaret Youngberg
Jacki Walczak	Lindsay White	Wayne Wohlens	Rev. Sally Youngquist
Anita Walczak	Allison White	Paula Wojtkowski	Malka Youngstein
Charlotte Waldron	Alice White	Leonard Wolf	Irene Yozzo
Betty Walker	Christiane White	Scott Wolf	Yi-Jin Yu
Sarah Walker	Jill Whitley	Margery Wolf	Jolene Yukes
Cleaveland	Jason Whitson	Colin Wolfe	Tom Zalocha
Elvia Walkingstick	brian Whittaker	Scott Wolverton	Erin Zaparyniuk
David Walko	Marla Wick	Dorothy P. Wonder	Lisa Zaslou
Gloria Walko	Stephanie Wieborg	John Wong	J. Zator
David Wall	Shannon Wiederholt	Stephen Wood	Jane Zawadowski
Will Wallace	Linda Wiegand	Pamela Wood, farm	Terri Ann Zdanowski
jennifer wallace	Anna Wiencrot	George Woodbury	Ruth Zeiders
Will Wallace-Gusakov	Linda Wiens	Carolyn Woodbury	Sally Zelonis
Kay Walser	Daniel Wiest	Joe Woodcock	Yelena Zeltser
jean walsh	Paulette Wight-	Roni Woodcock	Marge Zettler
Anna Walther	Amundsen	Daniel Woodham	Jean Zimmerman
Dean Walton	Jacqui Wilcox	Stuart Woodham	Joan Zimmerman
Emily Walvoord	Meg Wilcox	Lilla Woodham	Tiferet Zimmern-Kahan
Melanie Wambsganss	Thomas Wilde	Sharon Woodhouse	Harry Zitzler
Eugenia Wang	james wiley	Robert Woodin	Ariel Zodhiates
Buck Wanner	Brett Wilhelm	Robin Woodland	Phyllis Zoon
bob Warren	Eric Wilhelm	Evelyn Woodring	Alesandra Zsiba
Aliza Wasserman	Judy Wilkinson	Kevin Woods	Jess Zurbuch
Lynn Waterman	Shirley Willcox	Theresa Wooll	

RECENT DECISION BY USDA/ National Organic Program:

www.ams.usda.gov/nop/Compliance/AppealsSummaries/Sept05 -Mar07.pdf

“6. Improper inspection procedures

Proposed Adverse Action: Denial of certification

SUMMARY: A denial of certification was issued to community grower group, located in Mexico, for improper personnel structure of the Internal Control System (ICS) and lapses in its administration. Specifically, the ICS failed to detect the application of a prohibited insecticide by one producer and to provide evidence that the use of empty fertilizer bags for crop storage was confined to one producer. The appellant admitted fault, but contested that the severity of the sanction was disproportionate to the frequency and extent of the non-compliances .

RULING: October 27, 2006. The appeal was denied. The Findings demonstrated that the operation's oversight mechanisms for maintaining compliance were inadequate. Further, the certifying agent's policies and procedures for the certification of community grower groups were deemed inconsistent with the NOP and had been implemented prematurely prior to evaluation by the NOP. In conflict with the provision §205.403(a)(1), whereby each production unit must be inspected, the agent selected a percentage of the producers within a community grower group for on-site inspection. The internal inspection procedures, whereby each production unit is inspected, was overseen by members of the grower group who were not required to have sufficient expertise, be subject to an annual performance review or to disclose conflicts of interest.

The ruling established that use of an internal inspection system as a proxy for mandatory on-site inspections of each production unit by the certifying agent is not permitted. The appellant waived the right to a hearing, and the denial of certification was final. ”

2002 NOSB RECOMMENDATION REGARDING GROWER GROUPS:

NOSB Recommendation Adopted October 20, 2002

Criteria for Certification of Grower Groups

Introduction:

Grower group certification refers to the certification of a group of producers whose farms are uniform in most ways, and who are organized under one management and marketing system. Grower group certifications have historically been used for the certification of cooperatives or groups of producers located in a geographical or social region, whose crops are marketed collectively. Primary crops produced by grower groups include coffee, cocoa, tea, spices, and tropical fruits.

Background:

In section 205.2, the final rule defines “person” as “an individual, partnership, corporation, association, cooperative, or other entity.”

In section 205.400 “General requirements for certification,” the final rule states: “A person seeking to receive or maintain organic certification under the regulations in this part must:

- (a) Comply with the Act and applicable organic production and handling regulations of this part;
- (b) Establish, implement, and update annually an organic production or handling system plan that is submitted to an accredited certifying agent as provided for in § 205.200;
- (c) Permit on-site inspections with complete access to the production or handling operation, including noncertified production and handling areas, structures, and offices by the certifying agent as provided for in § 205.403;
- (d) Maintain all records applicable to the organic operation for not less than 5 years beyond their creation and allow authorized representatives of the Secretary, the applicable State organic program's governing State official, and the certifying agent access to such records during normal business hours for review and copying to determine compliance with the Act and the regulations in this part, as provided for in § 205.104;
- (e) Submit the applicable fees charged by the certifying agent; and
- (f) Immediately notify the certifying agent concerning any:
 - (1) Application, including drift, of a prohibited substance to any field, production unit, site, facility, livestock, or product that is part of an operation; and
 - (2) Change in a certified operation or any portion of a certified operation that may affect its compliance with the Act and the regulations in this part.”

Given the fact that the rule includes “cooperative” and “association” in the definition of “person”, and given the fact that section 205.400 indicates that it is a “person” who seeks organic certification, it can be concluded that grower groups, organized as cooperatives or associations, can seek certification as one operation under the NOP without a change to the rule.

Grower groups are different from other entities seeking certification in that they are comprised of numerous producers who are certified as one entity, rather than being certified as individual sole proprietors.

Historically, not all grower group members' farms are individually inspected by the certifying agent annually. This means that the grower group must have a quality system, or internal control system, in place to assure that all members of the group operate according to the system plan in compliance with the organic standard. The quality system of the grower group is inspected at least annually, but only a set percentage of the member operations are visited by the certifying agent. Individual site inspections are conducted primarily to validate the functioning of the quality system.

Rationale:

Many products sold as organic in the United States, including coffee, cocoa, tea, spices, and tropical fruits, are produced by grower groups. These types of operations are certified by certifying agents who have received NOP accreditation. While there is no need to change to the final rule, there is a need to provide guidance to the NOP to assure that certifying agents who operate grower group certification programs follow consistent procedures. There is also a need to assure that such certifying agents are evaluated according to set criteria during the accreditation review of their programs.

Recommendation #1:

Criteria for the Certification of Grower Groups

The NOSB recommends that, in order to be certified as a grower group, the following conditions must be met:

- The crops and farming practices of the producers must be uniform and reflect a consistent process or methodology, using the same inputs.
- The group must be managed as a legal entity under one central administration that is uniform and consistent.
- Participation in the group is limited to producers who sell all of their organic production through the group.
- Producers who are certified as part of a grower group do not possess individual certificates. Rather, the grower group is certified as a unit.
- Grower groups must establish and implement an internal control system (quality system), with supervision and documentation of production practices and inputs used at each producer's operation to insure compliance with the USDA's National Organic Standard.
- Grower groups must ensure that all members understand the US National Organic Standard and how it applies to their specific operations.
- Grower groups must utilize centralized processing, distribution, and marketing facilities and systems.

The certifying agent shall have policies and procedures for determining how many growers must receive an annual inspection by the certifying agent. For each grower group it certifies, a certifying agent must document its method for determining the number of growers to be inspected. This determination must include consideration of:

- The number of operations participating in the grower group;
- The size of the average operation in the grower group;
- The degree of uniformity between the group's operations;
- The complexity of the group's production system(s); and
- The management structure of the group's internal control system.

Recommendation #2:

The NOSB recommends that the following information be included in the NOP Accreditation Manual:

A. Inspection of Grower Groups

Information provided. The first step of any grower group inspection is to review the material from the certifying agent to determine the scope of the project. Grower groups are often very complex. They may include hundreds if not thousands of producers. These types of operations do not easily fit normal inspection protocols. Therefore, much supplemental data is necessary in addition to normal certification documents. The following is a list of information that the certifying agent must provide to the inspector prior to the inspection:

- General map indicating the general region of the production zone.
- A more detailed map indicating the location of each of the communities to be inspected.
- Grower lists by community, listing producers, producer codes or numbers, amount of land area under production by each producer, crops, estimated yields, and past production history. Many grower groups maintain individual producer records such as parcel maps and grower agreements which are generally reviewed at the time of inspection.
- Organic system plan, certification questionnaire, or application.
- Name of contact persons with phone numbers, both home and work. It is important to have access to at least two contacts in case the primary contact person cannot be reached.
- A description of the project to understand how it is organized. A previous inspection report should be provided for certification updates.
- Handling plans, questionnaires/applications, if there is any processing. (Many grower groups operate processing and/or storage facilities.)
- Information on final sales and distribution. This is important to determine if any off-site export or storage facilities need to be inspected.
- In the case of certification updates, the inspector should be provided with the past certification letter with all conditions for certification clearly stated. As indicated, the past inspection report can be extremely valuable, and should be reviewed.

Review internal control documents. Upon arrival at the inspection locale, meet with the management to plan the inspection itinerary. You should clearly understand the organizational

management of the project prior to heading out into the field. You will need documentation of the internal control system to properly verify local oversight efforts, education programs, product flow, and production practices. It is advisable to review internal control documents and other records before heading out into the field. This information can help you choose where to focus your inspection site visits.

Select the sites to visit. Make sure that you have the freedom to select any part of the project for inspection. Do not allow the grower group manager to “direct” the inspection. Keep in mind that the further a group of producers are from the main office or the internal control system administrator, the weaker the control may be. Attempt to visit remote producers to best assess the system.

Interview grower group members. Once the inspection begins, it is best to follow the product flow starting with the production sites, followed by primary processing, final processing, packaging, storage, and distribution. When visiting the producers, in addition to observing production practices and organic control points specific to the operation, the inspector must verify aspects critical to the overall project. Interview producers directly. Ask questions not only about their farms, but also about other project programs. How well does the producer understand what organic farming and certification means?

Ask direct questions. It is also important to ask producers, point blank, "When was the last time you used agro-chemicals?" You may want to ask specifically if this includes urea or Roundup or other brand name products common to the area. Often producers in a remote area do not clearly understand that these substances are prohibited. Do not assume anything. Individual farm integrity usually reflects the producer's understanding of organic certification, which is directly linked to the project's educational and oversight efforts.

Understand local issues. It is critical to understand the local culture, traditions, and common inputs. It is advantageous to invite a local inspector to accompany you. A local inspector can help build trust with producers and help you understand local issues. Such cooperative arrangements can help empower indigenous inspectors.

Office audit. Once all aspects of the project have been inspected, a final visit to the project office will likely be required for an audit. The audit of the entire project is best done at the end of the inspection, when the inspector has a more thorough understanding of the entire operation. Additionally, it will most likely be necessary to verify different pieces of information gathered during the field inspection.

Exit interview. An exit interview with the project management is necessary in order to answer remaining questions. This gives the inspector a last chance to secure missing information, obtain required signatures, clarifying confusing, inconsistent, or inaccurate information, and communicate issues of concern.

B. The Internal Control System and Organic Control Points (OCPs)

Assess the internal control system. The most critical component of both the grower group

inspection and the grower group inspection report is the assessment of the internal control system. (A grower group inspection is in fact an evaluation of the internal control system.) The report must address the steps taken by the internal control system to enforce compliance with organic standards.

- Have the operators been provided copies of the standards in a language or format they understand?
- Does the internal control system use individual inspection reports to assess operator compliance?
If not, how is compliance assessment documented?
- How often do official representatives of the control system visit each operation?
- What kinds of documents are generated to verify these visits?
- Are new operators inspected prior to being added to the GG?
- Have all grower group members signed a contract stating that they will comply with the organic standards and permit annual inspections?
- Are operators provided assistance to comply with the standards?
- What happens when non-compliance is suspected or detected?
- Are there records of the actions taken when non-compliance has been investigated?
- Does the control system have an official "sanctions" policy? If so, submit a copy with your report.

Report inconsistencies. It is important to clearly describe the consistency of the project from producer to producer. As indicated, different certifying agents may have different requirements for grower group inspections. Some may require spreadsheets with information on each producer; others may require site visit sheets signed by the farmer at the farm; others require inspecting only a percentage of the total number of producers. If you find prohibited practices and you are only inspecting 20% of the operations, it is a good bet that you have only found 1/5 of the problems. Removal of the individual producer is not necessarily the final answer. The situation may be an indication that the project is not providing proper oversight. Internal records should match your findings and the findings of the certification program. Present your findings in the inspection report, along with any inconsistencies and unresolved issues.

OCPs. It is very important to describe the organic control points of the overall operation, where loss of organic integrity may occur. The inspector should report the preventative steps taken to protect organic products, and identify deficiencies where organic control points are not sufficiently addressed.

The following is a list of examples of **organic control points** encountered during grower group inspections:

- Unclear registers of grower group members.
- Unclear or inadequate maps.
- Inclusion of new fields or new producers with no conversion or documentation.
- Use of synthetic fertilizers - A producer may think that because he or she uses no herbicides or pesticides, the operation is organic.
- Use of used agrochemical bags or containers for harvested products.

- Contamination during storage or transport, e.g.: boats with gas and water in bilge, or storage under the house with gas and paint on top of product.
- Insufficient buffers or non-separation from other crops that have chemicals e.g.: cacao inter-planted with plantain, with urea used to fertilize the plantain.
- Inclusion of crops from neighbors or relatives who are not on the producer list.
- Intentional chemical use. "I only used a little bit."
- Shared use of backpack sprayers which are also used for applying prohibited materials.
- Unclear internal purchase and transaction records within the grower group.

Processing by grower groups. Finally, grower group reports may include process inspection reports for all of the processes performed by the grower group. Make sure that the grower group has submitted a handling system plan, as applicable, and that the plan has been approved by the certifying agent. Follow handling inspection protocols and submit a handling inspection report.

C. Grower Group Inspection Report Guide

The grower group inspection report basically follows the outline for a farm inspection report. However, sections may need to be expanded, added, or modified. For example, a section on Organizational Management is helpful to describe many aspects of the project. This section should describe the structure and assess the functioning of the internal control system. It should also list the names of communities, number of producers in each, hectares of each, and, if possible, estimated yields, with totals.

The following outline summarizes the general areas of grower groups that should always be inspected, and provides a list of the additional topics which must be covered in a grower group inspection report:

- 1. Background**
- 2. Project headquarters and audit trail information; organization, accessibility, and accuracy of information; projected yields of products requested for certification**
- 3. Organization management, internal control system, and compliance mechanisms, including records maintained**
- 4. List of communities**
- 5. Grower lists**
- 6. All processing facilities, both on-farm and off-farm**
- 7. Transportation systems**
- 8. Storage facilities**
- 9. Field conditions; inspector observations**
- 10. Risk assessment; adjoining land uses; other organic control points**
- 11. Inputs used**
- 12. Equipment used**
- 13. Packaging materials**
- 14. Producer interviews; inspector observations**
- 15. Education program – producer understanding of organic principles and standards**
- 16. Split operations - production of non-organic crops/products by grower group**

- members
- 17. Other considerations**
- 18. Summary**
- 19. Attachments**

D. Outline for Organization and Assessment of the Internal Control System (ICS)

1. Field officers

Field officers are employed by the grower group. They have mixed roles:

- a. Information/extension
- b. Registration of growers
- c. Internal control
- d. On-farm research

Field officers often become part of the community. Because field officers have internal control and education functions, they may have conflict of interest issues. This can be solved by rotation of field officers or field officers from other areas handling the internal control function. There should be a minimum of one field officer per maximum 500 farmers.

2. Principles of ICS

- a. analyses/description of situation
- b. appropriate, documented system
- c. awareness raising, information and instruction, contracting, verbal and written, social controls, monitoring, corrective actions, risk analyses

3. ICS documents

- a. Project description
 - 1. Basic project outline
 - 2. Farmer and farm profile, grower lists, site maps
 - 3. Farming practices
 - 4. Farmer support system
 - 5. Stakeholder analyses
 - 6. Risk-assessment
- b. The ICS itself
 - 1. ICS personnel and the ICS office
 - 2. Documentation & record keeping (forms)
 - 3. Monitoring and corrective actions
 - 4. The buying system arrangement
 - 5. Product storage and handling procedures
 - 6. Code numbering and product tracing
- c. Updating the system (annual report)
 - 1. Compliance with standards
 - 2. Corrective actions undertaken
 - 3. Farm/project economy – financial report

4. Update of documents

E. Evaluation of the Internal Control System (ICS)

The outline below contains further methodology for evaluation of the ICS by the third party inspector:

a. At the ICS office

1. Review of the documented system (Is it sufficient for the current situation?)
2. File check to see whether system is being adhered to (Is office, are documents, is staff, is the system functioning?)
3. Review cases of farmer non-compliance
4. Identification of problem areas/risk assessment
5. Construct a plan for field visits:

- Select some to get a general feeling, at random
- Select some targeted at problems/risk areas and distant production sites

This work can be done in one day if the office and staff are well organized. The inspector should use a format/checklist/reporting form for this office work.

b. In the field

1. Field visits

- Conduct some farm re-inspection visits
- Inspect some at random (can even be demonstration farm or village elders)
- Inspect some focused on the problem/risk areas
- Meet with community, second parties
- Evaluate social control mechanisms
- Meet with third parties

As soon as a non-compliance is detected, the inspector will want to determine whether the non-compliance is the odd exception or whether it is widespread.

c. Back in ICS office (exit interview)

1. Share evaluation of the field visits with field staff.
2. Identify OCPs and potential non-compliance issues.
3. Discuss strategies to address areas of non-compliance with management and field staff.