



# ISDA Organic Program Newsletter



## Organic Program Update *February 2025 Annual Update*

### Welcome to 2025!

We've made some major changes over the last year, which I think many of you will be happy to hear.

We have eliminated the wait list and will now be accepting new operations into the Organic Program during our Open Enrollment Period from Nov. 1 – May 31 of each year. We began working to eliminate the wait list in Spring 2024, and as of the end of October 2024, we notified everyone on the wait list that those still interested could apply to the Organic Program. Open enrollment will work like this:

Open Enrollment Period: November 1 – February 28

Late Applicants Enrollment Period: March 1 – May 31, will be processed in the order they are received, and certification will not be guaranteed if we do not have the capacity to take them.

If you know of anyone interested in becoming certified organic through the ISDA, please send them our contact information and let them know we will be happy to help them begin the certification process.

Speaking of changes, there were many changes with the ISDA Organic Program staff lineup in 2024-25. Here are the current team members, their positions, and respective office locations:

- Rebecca Frey, Organic Program Manager (Boise)
- Jonny Church, Organic Program Specialist (Boise)
- Ashley Buhler, Organic Program Specialist (Idaho Falls)
- Rich Kempton, Organic Investigator, Sr. (Boise)
- Mandy Collins, Organic Investigator, Sr. (Boise)
- Bonna Cannon, Organic Investigator, Sr. (Twin Falls)
- Anais Vazquez-Ruiz, Organic Investigator, Sr. (Burley)
- Eleanor DelaRosa, Organic Investigator, Sr.

As you can see, we were able to promote one existing staff member, Ashley Buhler, into a new Program Specialist position in April 2024. Also, we were able to add back a 5<sup>th</sup> inspector position in November 2024. We moved one of the remote offices out of Blackfoot to the Idaho Falls office, which is now the home base for two of our staff members. The Organic Program is now functioning with the most staffing we have ever had in the history of the program!

Our team at ISDA would like to give a huge **THANK YOU** to all of our organic producers. We are still working on our final review of many of your files from 2024, and we know that several of you are awaiting your updated organic certificate. Your patience and continued support of our program have been incredibly helpful to each of us through our staffing changes over the year. If any of you need a Letter of Good Standing in the meantime, please reach out to the Organic Program at [organics@isda.idaho.gov](mailto:organics@isda.idaho.gov) or call us at (208) 332-8680.

We appreciate all of you and look forward to working with all of our producers in 2025!

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Photo courtesy of Rebecca Frey

## Accessing Organic Certificates on Organic Integrity Database

Certificates are easily accessible on the USDA's Organic Integrity Database website.

[Organic Integrity Database](#) (CTRL + click)

You can view, save, and print certificates any time you need. Once you're on the Organic Integrity Database website, look up the operation you need. When you have clicked on the operation, in the right-hand corner, under the operation profile line, it will give you two options. You will have an option to *Export to PDF* or *Print Certificate*. Print Certificate will download the official Organic Certificate to your computer. Exporting to PDF will download the Organic Profile Page. The Organic Profile Page can be used to verify what products an operation is certified for but cannot replace the organic certificate. After the files have been downloaded, you will then be able to open and save the Certificate to your files.

The Organic Integrity Database has lots of helpful information, so we suggest taking the time to get familiar with all the available features.

Having certificates saved to your computer as well as printed copies can be a great advantage and protective measure. If issues occur while on the Organic Integrity Database website, please give it time and try again later. The website is ever-changing and experiences frequent updates which can cause technical difficulties. Waiting until the day of the inspection or until the last minute when you need a certificate is not recommended. That might be the day the website decides not to work.

As of March 19<sup>th</sup>, 2024, the N.O.P. passed rule 205.662 (e)(3), which states: *“Within 3 business days of issuing a notification of suspension or revocation, or the effective date of an operation's surrender, the certifying agent must update the operation's status in the Organic Integrity Database.”* Certificates are required and expected to be up to date. The ISDA team updates the Organic Integrity Database promptly after the final review is done for an operation.



## Breeze Through Your Annual Organic Inspection: Commonly Seen Mistakes and How to Avoid Them

Want to breeze through your annual organic inspection with flying colors? Inspectors have seen many things over the years, but certain recurring issues often stand out. To ensure a smooth process, we've compiled a list of commonly missed items during inspections, along with guidelines on how to avoid these pitfalls.

- **Supplier List Supplement (Handling):** Ensure that you maintain an up-to-date supplier list as a required supplement to your Organic System Plan (OSP). This supplement is used to verify suppliers and ingredients used in organically certified products, and the form can be found on our website. Make sure to re-submit it when any suppliers or ingredients change or are added/removed to/from your product(s).
- **Material Input Documentation (Handling, Crop, and Livestock):** “May I see the OMRI certificate (or other material approval documentation) please?” and “Can I see the Organic Certificate for this input?” These are common questions that your inspector will ask when reviewing any products or inputs that are listed in your OSP. All inputs need to have a current certificate each year, even if they were purchased in prior years or haven't been used. Remember: if it is on the OSP, a current certificate will need to be seen on inspection. Failure to have proper documentation for organic materials, such as OMRI certifications or organic certificates from suppliers, can lead to compliance issues. All inputs must also be listed in your OSP. Consult §205.103 for record retention requirements.
- **Big 3 Statements (Handling):** It's crucial to furnish the Big 3 statements for each non-organic ingredient to verify the compliance of your organic products. The Big 3 Statements need to show that the input was not produced with excluded methods (e.g. not made with GMOs), is not made using ionizing radiation, and not produced with sewage sludge. Updated letters will need to be furnished every 5 years for these ingredients and all letters should be available for review at the time of inspection. Refer to §205.105 for more on allowed and prohibited methods and ingredients in organic production.
- **Changes to Organic Product Profiles (OPPs) (Handling):** The OPP is an essential part of your OSP for multi-ingredient products. Once an OPP is submitted, it must be reviewed and approved by ISDA before the product can be considered organic. Whenever changes to formulas are made, updated OPPs must be submitted and approved before the product can be produced as organic. Make sure to keep copies of approved OPPs in your file. Refer to §205.400(f)(2) regarding the timely submission of documents for organic production.
- **Label Updates (Handling, Crop, and Livestock):** Major changes in product labels (including the introduction of a new product) must be submitted to ISDA before use, as indicated by §205.400(f)(2). Failure to do so could lead to a notice of noncompliance. Before the label can be applied to the product, it must be approved by ISDA. If a “minor” change to an already-approved label is made such as changing a photo or font type, prior approval is not required. However, it is still best practice for operations to submit all changes in advance to prevent problems and ISDA encourages producers to be proactive. If an operation makes a “minor” change that results in a noncompliant label, they risk receiving a noncompliance.
- **Facility/Field Notification (Handling, Crop, and Livestock):** Any additions of new facilities, storage houses, storage bins, and/or fields used in the production of organic products must be reported to ISDA as guided by §205.403. As the certifying agent, ISDA must inspect new additions prior to use for organic products. For crop producers, any new fields brought on must have a signed Land Use Affidavit for the designated parcel stating that no prohibited substances have been applied for a period of 3 years preceding harvest of the crop.

## Breeze Through Your Annual Organic Inspection: Commonly Seen Mistakes and How to Avoid Them (continued)

(Continued from previous page)

- **Recordkeeping with respect to Saved Seed Records (Crops):** When saving seeds to plant next year's crop, make sure to keep accurate records for those seeds. Per §205.103, complete records of the amount of seeds saved, the location where they are stored, and any pest control inputs used during storage must be kept. If the seeds are cleaned, detailed records of who cleaned the seeds, whether the seed cleaner is organically certified, and the amount of seed and type cleaned need to be kept to ensure organic integrity.
- **Recordkeeping with respect to bale inventory (Crop, Livestock)** Maintaining accurate harvest records is required per §205.103. When recording harvest for baled crops, keeping an accurate bale count is essential for traceability and organic integrity. Detailed records must be kept for all sales and usage must be tracked, including if bales are fed to your own herd. If inventory is kept year to year, carryover amounts must be accurately accounted for in your records. Livestock feed requirements for ruminants can be found in §205.237(d)(1-4).
- **Crop Rotation Practice (Crop):** Crop Rotation is a requirement of organic farming and helps to improve soil health, control pests and diseases, mitigate erosion, and increase crop yields. The definition of crop rotation can be found in §205.2 and the crop rotation standard is outlined in §205.205. ISDA accepts crop rotation plans that include two years of consecutive planting of annual crops in the same plant family without interruption. An Alternative Crop Rotation Request form must be submitted for review in advance for any plans that fall outside of the two years. Remember that your crop rotation plans must be accurate in your OSP as well.
- **Commercial Availability Searches for Seeds (Crops):** The seed practice standard is found in §205.204 stating that organic seeds must be used except if an equivalent organically produced variety is not commercially available. The definition of commercially available is found in 205.2 and is based on form, quality, or quantity. Producers may not use cost as a basis for commercial availability. ISDA requires that producers document all commercial availability searches in their OSP by listing three suppliers from which they've attempted to source organic seed. If the organic saved seed is cleaned by a non-organically certified seed cleaner, that saved seed loses its' organic status and a commercial availability search must be conducted to use that seed.
- **Accurate Herd List (Livestock):** It's vital to maintain an accurate herd list that includes tag numbers for each class of organic animals, including replacement heifers. This traceability is critical for compliance with organic integrity and is found in 205.236(c). The records must clearly show the identity of all organically managed animals, including whether they are transitioned animals. The traceability must also carry through to transport and slaughter as described in §205.242(a)(1).
- **Healthcare Protocol (Livestock):** A comprehensive healthcare protocol detailing healthcare products and treatments used for each animal is required to maintain organic integrity as outlined in §205.238. Recordkeeping requirements are addressed in §205.103. Ensure that you have material approval documentation or prior approval from ISDA before using healthcare products for your animals. Refer to §205.603 for the list of allowed synthetic substances. At inspection, an ISDA inspector must be able to see clear records for each animal showing what treatments were given.

By proactively addressing these common oversight areas and having all your required records available for audit by the inspector, you can ensure a seamless organic inspection. Accurate recordkeeping supports compliance. Let's work together to uphold the integrity of organic farming and production. Thank you for your commitment to organic practices!

## Livestock Confinement Allowances & Requirements

There have been rule changes in the NOP regarding confinement for ruminants and avians. These changes will take effect on January 2nd, 2025. However, for hog and poultry operations certified prior to January 2, 2025, rules regarding change of outdoor and indoor stock density and poultry house exits will be fully implemented starting January 2nd, 2029. Animals must have access to the outdoors year-round that is tailored to the animal in all stages of life including shade, shelter, and exercise areas. There are exemptions to this that allow for temporary confinement under certain conditions.

The following exemptions are allowed for ruminants and avians. Temporary confinement for ruminants may include inclement weather, the animal's life stage (not including lactation for ruminants), conditions that may jeopardize the health, well-being, and safety of the animal, potentially harming soil or water quality, and any necessary healthcare procedures or treatments. Temporary confinement for youth projects, such as 4-H, National FFA organization, and others are allowed. However, confinement cannot last longer than one week before a fair or other demonstration, during the event, and 24 hours after arriving home from the event. The facilities the events are held in are not required to be certified organic for the participation of the organic animal. They may also be temporarily confined for sorting, shipping, and livestock sales, as long as they continue under organic management, which includes organic feed throughout the confinement.

**Ruminants:** Ruminants may be temporarily confined during their dry-off period at the end of lactation, prior to and after parturition, or for newborn dairy cattle up to 6 months. For newborn cattle after 6 months, they must be on pasture during the grazing season and no longer in individual housing. During this time the temporary confinement must not restrict the animal from moving freely, standing, or lying down. Shearing fiber-bearing animals and daily milking of dairy cattle are allowed short periods of confinement. Temporary confinement may also be used for the act of breeding (naturally or artificial insemination) but not to monitor estrus nor to confirm pregnancy.

**Avians:** Confinement for avians must be recorded and the following circumstances are allowed. Inclement weather such as temperatures under 32 F or above 90 F, the first 4 weeks of life for broilers, the first 16 weeks of life for pullets, and until fully feathered for other species. Temporary confinement is also allowed for nest box training but must not exceed 5 weeks over the bird's life.



Monument Peak -Photo courtesy of Bonna Cannon

## ISDA Organic Program Database

In the second half of 2024, the ISDA Organic Program began the development of a new online database that will replace many processes within the program. The purpose of this database is to expedite and simplify the application, renewal, inspection, and final review processes, thus creating faster turnaround times for new organic certificates and increasing the program's capacity. Instead of filling out various forms each year, customers will create accounts in the database and answer questions regarding their operation. Their answers will become their Organic System Plan and generate various reports that ISDA will review. By fully digitizing the Organic System Plans and Application, the customer's information will be more organized and easier to access.

So far, ISDA staff have worked hard to prepare several forms the developer can convert into software programming. These forms include OSPs, the Application, Export Affidavits, Supplier Lists, and several others. ISDA has also begun implementing a new application window that will allow any interested parties to apply for organic certification each year. From November through February, ISDA will review all submitted applications and accept those deemed capable of following the Organic Standards. Applications received from March through May will be considered late and processed in the order they receive. Certification is not guaranteed for applications received during this period. Applications received after May 31st will not be accepted.

Currently, ISDA is planning the reporting side of the database including how submitted information will be accessed and utilized by ISDA staff. The goal is to create a workspace that will be easy to use and thus decrease the time between inspection and final review. Part of this will be to restructure how organic inspections are reported with the goal of making the reports simpler. ISDA is currently in the early stages of this phase and there is a lot left to do, but the team is excited and optimistic that the changes will improve the process for all parties involved.

Right now, ISDA has the goal to have the database up and running by November 2025. This is a tentative date as future stress testing and development will likely reveal new obstacles. During the recent Advisory Council meeting, it was suggested that videos and other resources on how to use the new database be provided and we fully agree. As the release of the database approaches, customers can expect these resources to be made available.

At ISDA, it is our hope and goal to create an Organic Program that serves the community as much as possible. We believe that new database will be a beneficial resource that creates clearer communication between operations and ISDA staff. Please feel free to reach out to us with any questions.



Tetons IND—TWF - Photo courtesy of Bonna Cannon

## Meeting Organic Exemptions

The option to market products as organic without formal certification is available provided that certain exemptions are met. Exempt operations are permitted to sell, label, and represent their products as organic; however, they are not authorized to utilize the USDA organic seal or to market their products as "certified organic." For many small operations, the costs associated with certification may render it impractical, yet these entities may still promote their products as organic so long as they meet one of the exemptions. It is crucial to note that exempt operations are still required to adhere to the standards established by the USDA National Organic Program (NOP) for organic production and keep records for three years.

The exemptions include the following categories:

1. Organic farms and businesses generating less than \$5,000 in gross annual organic sales.
2. Retail establishments that sell certified organic products directly to consumers without any modifications, such as grocery stores featuring an organic section or bakeries offering pre-packaged organic goods.
3. Retail establishments that prepare and serve raw and ready-to-eat food using ingredients that are originally labeled as "100 percent organic," "organic," or "made with organic," such as restaurants.
4. Warehouses and cold storage facilities that exclusively manage tamper-evident packaged organic products that stay in the same packaging or container.
5. Handling operations that exclusively handle products containing less than 70 percent organic ingredients.
6. Sales brokers who procure or receive products in their final retail packaging that is tamper-evident; however, this exemption does not apply to brokers, traders, or other handlers who engage in the purchase or sale of products not in their final retail packaging.
7. Brokers who do not take physical possession of goods and who do not sell, import, or trade agricultural products. This includes customs brokers who facilitate the entry of products into the United States and must file NOP Import Certificate data with the U.S. Customs and Border Protection's Automated Commercial Environment import entry system.
8. Logistics brokers responsible for arranging the shipping, storage, transport, and other movement of agricultural products who do not otherwise handle organic products.

Further details regarding each exemption can be found at 7 CFR 205.101.

While these exemptions exist, there are many benefits of organic certification including the ability to utilize the USDA Organic Seal on your finished products. Also, if the costs of certification are an issue just remember Organic Cost Share is available to help cover 75% up to \$750 per scope of the costs of your annual organic certification. Organic Cost Share is administered by the Farm Service Agency (FSA), and your local county FSA representatives are available to help you.



Photo courtesy of Rebecca Frey



## Mushroom Regulations

Organic operations planning to grow organic fungi must comply with the requirements of the new Market Development for Mushrooms and Pet Food rule by February 22, 2027.

Fungi require different growing conditions than plants and are grown from spawn instead of seed. Mushrooms are grown in substrate material made of composted plant material, minerals, sawdust, and/or logs and do not absorb compounds from their environment to use as sources of energy. The new regulations add new terms including Mushroom, Mushroom substrate, Mycelium, Spawn, and Spawn media. It also amends existing terms such as Compost, Crop, and Wild crop. The new regulations add mushroom-specific standards and replace the term “plant” with “crop”. Mushroom operations do not need to follow all the requirements in the soil fertility and crop nutrient management practice standard at § 205.203, the seeds and planting stock practice standard at § 205.204, or the crop rotation practice standard at § 205.205.

The mushroom substrate can come from composted plant and animal materials, uncomposted plant materials, non-agricultural natural substances, and synthetic substances. The composted materials will now have different requirements than traditional compost used for other types of growing systems. When a functionally equivalent organic material for use in substrate is not commercially available, nonorganic plant materials may be used in substrate, except that prohibited substances must not be applied to any nonorganic plant material after harvest of the plant material. Non-organic wood materials can be used if not treated with prohibited substances after harvest.

### Mushroom Substrate

AMS defines mushroom substrate as the base material (such as grain, wood materials, composted materials, and/or other agricultural materials) on which mushroom production occurs. Components of mushroom substrate can vary depending on the species to be cultivated.



# The Evolving Landscape of Agriculture: Challenges, Trends, and the Promise of Organic Farming

Agriculture is at a crossroads. With dropping farm incomes and rising input costs, the sector faces significant economic and environmental challenges. However, organic farming offers a sustainable and profitable path forward, emphasizing environmental benefits and growing consumer demand.

## Farm Income Trends

Farm income has been on a downward trajectory since its peak in 2022. The USDA reports that net farm income, which reached \$181.9 billion in 2022, is projected to drop to \$140.7 billion by 2024—a 6.3% inflation-adjusted decline from 2023. Key factors include:

- Lower commodity prices
- Higher input and labor costs and borrowing rates
- Decreased government support
- Market volatility and weather disruptions

## Soil Health: A Critical Issue

Soil degradation remains a significant concern, costing the U.S. \$67 billion annually. Key issues include:

- **Erosion:** Water-driven erosion affects 24% of fields; wind-driven erosion impacts 10%.
- **Soil compaction:** Found in 22% of fields, reducing productivity.

**Low organic matter:** Reported on 13% of fields, weakening soil fertility.

Improving soil health through regenerative and organic practices is vital for the environment and long-term profitability.

## The Organic Advantage

Organic farming is gaining momentum as a sustainable alternative to conventional methods. Consumer demand for organic products continues to outpace supply, driving premium prices. Organic practices emphasize:

- **Environmental benefits:** Reduced reliance on synthetic chemicals and improved soil health.
- **Market potential:** High-value products like organic milk, grass-fed beef, and specialty crops.

**Consumer trends:** Increasing interest in sustainable, health-conscious food choices.

Unlike conventional farming, organic methods build resilience by prioritizing biodiversity and reducing environmental impact, making it more sustainable in the long run.

## Emerging Opportunities in Organic Farming

Farmers can diversify their income and improve profitability by:

1. **Specialty crops:** Growing high-value vegetables like heirloom tomatoes, mushrooms, and microgreens.
2. **Greenhouse production:** Year-round cultivation of high-demand crops.
3. **Direct-to-consumer sales:** Utilizing farmer's markets and Community Supported Agriculture (CSA) programs for higher margins.

## The Evolving Landscape of Agriculture: Challenges, Trends, and the Promise of Organic Farming

### Regenerative Practices for the Future

Regenerative agriculture, a cornerstone of organic farming, focuses on rebuilding soil health and improving ecosystems. While organic yields have historically been lower, advancements in techniques are closing the gap, making organic farming increasingly viable and profitable.

### Conclusion

The challenges in agriculture today call for innovative solutions. Organic farming, with its environmental benefits and market advantages, offers a promising way forward. By embracing regenerative practices, farmers can not only boost profitability but also secure a sustainable future for the industry and the planet.

### Sources:

- USDA Economic Research Service
- Agriculture Senate Newsroom: "USDA Forecasts Sharpest Decline in US Farm Income in History"
- Farm Bureau: "Agriculture in the Red: Net Farm Income Drops Again in 2024 Forecast"
- Agriculture Dive: "Farm Bill Extension and Economic Aid"

## ISDA Organic Staff Bios

**Rebecca Frey** has worked with the ISDA Organic Program since January 2018 and moved into the Organic Program Manager role in March 2022. She has a bachelor's degree from BSU in Environmental Studies with an emphasis in biology. In her free time, she can be found planning her next vacation, playing trivia with friends, and spending time with family and friends while hiking or camping. Rebecca is still based in the Boise office and looks forward to continuing to serve the growing organic industry in Idaho.



**Ashley Buhler** joined the Organic Program in April 2018 and works from the Idaho Falls office in the Organic Program Specialist role. Ashley has a bachelor's degree from Utah State University in Agricultural Education. Prior to ISDA, she worked for an organic chicken company in the Midwest. Ashley loves to garden and read fiction novels. She also spends much of her spare time traveling, trying new restaurants, and attending sporting events with her husband.



**Jonny Church** joined the ISDA Organic Program in September of 2022 beginning as an Organic Investigator, Senior, and moved into the Organic Program Specialist role in 2023. Before ISDA he worked as an Operations Manager for a small buckwheat processing facility in Emmett, Idaho. He received a bachelor's degree in horticulture production from Brigham Young University-Idaho in 2016 where he also worked as the school's greenhouse manager. He is a born and raised Idahoan with a strong love for the outdoors, gardening, and playing board games. He currently resides in Emmett with his wife and three children.



## ISDA Organic Staff Bios (continued)

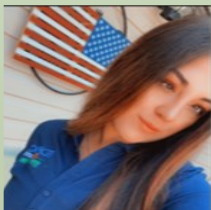
**Rich Kempton** has worked for the ISDA since August 2019, beginning as an Agriculture Inspector in the Fresh Fruits & Vegetables program. He transferred into Ag Investigator Sr. in the Organics Program in 2022. He graduated in 2019 with a Bachelor of Science degree in biology from Boise State University. Prior to working for ISDA, he grew up on the prairie of Post Falls, Idaho. He spent many years working in silviculture and wildland fire for the Forest Service in Idaho and Montana. In his free time, he likes watching college basketball, traveling back to North Idaho to visit friends and family, and hiking into mountain lakes and the high alpine country.



**Mandy Collins** joined the ISDA Organic Program as an Organic Investigator, Senior in January 2024. She has a bachelor's degree in biology from Sonoma State University and an MBA from Boise State. She was a winemaker in California's wine industry for many years and worked a harvest in Chile as well. She comes to ISDA from a non-profit that administers the USDA Food Program to childcares. Mandy has three teenage children and she loves to hike, snowshoe, and kayak in Idaho's great outdoors. She is based out of the Boise office.



**Eleanor DelaRosa** joined the ISDA Organics Program in November 2024 and is located out of the Idaho Falls office. Previously she joined ISDA in June 2019 as a Fresh Fruits and Vegetables inspector as well as performing Food Safety Audits since 2022. She has a Veterinarian Assistant Certification as well as experience working with Noxious Weeds in Wyoming. She spends her free time outside as much as possible making sure her two Border Collies (Hank Williams and Patsy Cline) get to see the world.



**Anais Vazquez-Ruiz** joined the ISDA Organic Program in October of 2024 and is in the Burley office. Anais grew up in Eastern Washington on a small ranch where she helped with her family's cow-calf operation. She then received a Bachelor's degree in Animal Sciences in May of 2024. During her time at WSU, she gained experience during her summer internship at one of Agri Beef's feed yards. Anais enjoys cooking, trying new recipes, and admiring the scenery around her.



**Katherine "Kate" Putnam** started with the ISDA in 2024 as a Seasonal working for Hops as an inspector followed by an Egg inspector. She is now an Administrative Assistant 2 for FSMA/Hops/Hemp, Organics and Warehouse. Kate has a Degree in Horticulture and loves plants. She is excited to work for the ISDA and contribute to our Mission, "Serving consumers and agriculture by safeguarding the public, plants, animals, and environment through promotion, education, and regulation." Kate is also a dog mom to Duke, Sophie, and Ernie.



**Bonna Cannon** joined the ISDA Organic Program in May 2024. Before she worked as a food safety consultant and she has worked at several other companies in Food Safety, Quality, and Engineering. She has an MS in Engineering Management from the University of Idaho and a BS in Chemical Engineering from Kansas State University. She grew up in Kansas on the family farm. She currently resides in Twin Falls County and enjoys flying and spending time outdoors with her son.

