



CCOF

Organic Certification Trade Association Education & Outreach Political Advocacy



TO: Joe Smillie, Chair, NOSB Certification, Accreditation & Compliance Committee
FROM: Peggy Miars, Executive Director, CCOF
RE: Comments on Certification of Grower Groups
DATE: August 31, 2007

We at CCOF commend the NOSB and the NOP for taking necessary steps toward enforcement of USDA standards throughout the world in order to ensure the integrity of the organic label worldwide.

CCOF does not, and has not, certified Grower Groups. We believe that in order to maintain the integrity of organic products, all producers should complete the certification process, including individual annual inspections. Additionally, CCOF does not believe that the NOP provided sufficient regulatory room to certify Grower Groups or other types of group management systems.

Ultimately, we encourage the elimination of Grower Groups under the NOP. While Grower Groups represent an important opportunity in some regions, CCOF believes that the long-term interests of the NOP should require a regular sunset of Grower Group provisions and a move toward an international norm of 100% site inspection, as is required for the majority of U.S. and foreign producers.

As long as Grower Groups are allowed, we believe that participation should only be available to growers producing less than \$5,000 US in organic sales. Growers earning more than \$5,000 US in sales should be able to afford certification. This limitation provides a window for very small growers without creating a massive loophole in the NOP for U.S. and foreign producers to avoid inspections of all production sites.

We believe that the NOP needs to provide guidance to ensure that certifying agents who operate Grower Group certification programs follow consistent procedures. There is also a need to ensure that such certifying agents are evaluated according to set criteria during the accreditation review of their programs.

Finally, and perhaps most importantly, we urge the immediate termination of retail certification under the certification of Grower Groups. Since certification is voluntary for retailers, we see no need to allow the use of Grower Groups for this category. Most retailers seeking certification have the resources necessary for individual certification of each store. CCOF sees this ongoing practice as a violation of the NOP. Further, the NOSB recommendation under which some Grower Group certification is administered is not intended to be, nor should be, used as a justification for less than 100% annual inspections of retailers, handlers, processors or other entities of this type.

Thank you for this opportunity to comment on this topic.

cc: Lloyd Day, Administrator, USDA Agricultural Marketing Service
Barbara Robinson, Deputy Administrator, USDA Agricultural Marketing Service
Mark Bradley, Associate Deputy Administrator, USDA Agricultural Marketing Service (NOP)
Valerie Frances, Executive Director, National Organic Standards Board