



CCOF

Advancing organic agriculture through certification, education, advocacy, and promotion.

Ms. Michelle Arsenault
Advisory Committee Specialist
National Organic Standards Board, USDA-AMS-NOP
1400 Independence Ave. SW., Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-18-0029-0001

Re: Compliance, Accreditation, and Certification Subcommittee: Developing criteria for risk-based accreditation oversight proposal and training and oversight of inspector and certification reviewer personnel proposal

October 4, 2018

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Compliance, Accreditation, and Certification Subcommittee's proposals "Developing criteria for risk-based accreditation oversight" and "Training and oversight of inspector and certification reviewer personnel."

CCOF is a nonprofit organization governed by the people who grow and make our food. Founded in California more than 40 years ago, today our roots span the breadth of North America. We are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers. Together, we work to advance organic agriculture for a healthy world.

CCOF supports both proposals on increasing oversight in the organic sector. NOSB identified 13 important risk factors for identifying high-risk certifiers, especially the inclusion of incomplete or minimum required data reporting to the Organic Integrity Database as a risk factor. Although the database can accept acreage data from certifiers, not all certifiers report acreage into the database. Currently, acreage data is available for less than 30% of organic operations in the U.S. and no data is available in high-risk regions.

Certifiers that do not or cannot provide production acreage data require additional oversight because their lack of acreage reporting indicates that they cannot adequately trace product through the supply chain, and in turn hinders the ability of NOP, certifiers, and stakeholders to evaluate the total volume of organic product coming from any given region. CCOF reports acreage on our organic certificates, on our website, in our organic member directory, and to the Organic Integrity Database because it supports transparency in the global organic supply chain.

As discussed in recommendation number four of the proposal on training oversight, a standardized system of tracking qualified inspectors could help certifiers improve their inspector hiring and contracting decisions. However, an overly standardized training or accreditation requirement could inadvertently disqualify a range of talented inspectors and certification review personnel and limit the pool of qualified inspection and certification review personnel. A smaller pool of qualified inspectors and certification review personnel will in turn drive up certification and inspection costs.

Most certifiers already have effective hiring and training programs based on their business needs, such as hiring inspectors in underserved regions of the U.S. or for specific certification scopes. Therefore, CCOF appreciates the NOSB's recognition of the need for a cost/benefit analysis before moving forward with prescriptive requirements.

Thank you for your review of our comments. Please do not hesitate to contact me for further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Nell". The signature is fluid and cursive, with the first name "Peter" and last name "Nell" clearly distinguishable.

Peter Nell
Policy Specialist

cc: Cathy Calfo, Executive Director/CEO
Kelly Damewood, Director of Policy and Government Affairs
Jake Lewin, President, CCOF Certification Services, LLC