



CCOF

Organic Certification

Education & Outreach

Political Advocacy

Promotion

National Organic Program
Attn: Cheri Courtney,
Accreditation and International Activities Branch Chief

February 19, 2016

RE: Revision of Instruction 2027

Dear Ms. Courtney,

It has recently come to the attention of CCOF Certification Services that NOP is in the process of revising Instruction 2027. Further, that NOP has indicated that in spite of submitting our existing program and not receiving a response, we should not assume our program has been accepted, or will remain acceptable in the future. Please be aware that CCOF has worked to implement 2027 in good faith and with an intention to create value within the National Organic Program.

We have valued the requirement and, given the flexibility inherent in the language of the instruction ("should"), have invested and built a program in good faith. We have found that field evaluations benefit our organization and organic as a whole. However, we are very concerned that the NOP requirement for a field evaluation of every inspector every year negatively impacts those of us who have taken on this requirement in a way designed to get the best outcomes long term.

A one field evaluation per year system negatively impacts both small and large certifiers while creating strong disincentives for certifiers to work with underserved farmers and locations. It forces us all into very complicated planning to perform field evaluations for inspectors we may or may not use again and to make nearly every inspection they perform have an additional oversight scheduling component. This will serve to compound inefficiencies and make organizations more expensive and less responsive in precisely those areas where they are trying to be helpful such as underserved communities, like the rural south.

In these recommendations we have strived to consider your intent and priorities and to make suggestions not based solely on what we do now but where we could improve and invest further as long as the same requirement applied to all certifiers. We strongly ask you to consider the following:

1) Annual field evaluations as a hard requirement are unworkable and inefficient.

In 2015 CCOF worked with approximately 70 inspectors who performed between 206 and 1 organic inspection (average=60, median=39). This spread accounts for inspectors who perform 0.049% to 5% of CCOF's total inspections (~4,300). We do not track which of these inspectors work for other certifiers, though we are aware of some overlap.

CCOF's current system allows us to review those inspectors who do the most inspections more often than those that do the fewest. A policy that requires all inspectors to undergo field evaluation annually will force us to focus more where there is less impact. For example, we will observe our top 5 inspectors at only .5% of their inspections but between 10% and 100% of the inspections of our least used inspectors. This is monumentally inefficient and takes away our discretion.

2) Allow ACAs to implement an alternative approach as follows if they do not perform an annual field evaluation with each inspector.

- a. **Require an annual field evaluation requirement only for each inspector performing more than 40 inspections annually.** This would be based on reasonable assumptions of annual performance based on past and current inspection seasons. 40 inspections, as CCOF's median inspections quantity of inspections per inspector, would force half of our inspectors to undergo a field evaluation annually.





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- b. **Inspectors below this threshold should be held to a field evaluation no less than every three years.** This gives certifiers the ability to focus but the inspectors that do the highest number of inspections get the most oversight within the National Organic Program without ignoring oversight for the least busy inspectors. For example, this would mean that ~50% of CCOF's inspectors will receive an annual field evaluation and the remaining would receive one at least every three years. Many will still receive one from another certifier on either their annual or three year cycle. The patchwork of inspectors and volume will have a strong ongoing field evaluation outcome without forcing each and every certifier to perform a field evaluation where they are needed least or are most inefficient.
- 3) **Require that certifiers perform a minimum number of field evaluations equal to a percentage (50%-100%) of their active inspectors at the end of the previous year. CCOF CS would prefer this percentage be set at 50%, but could support 75%, which would force us to approximately double our current field evaluations!** This would support ACAs performing additional field evaluations where they are most impactful and effective while not allowing ACAs to minimize their overall efforts to only 1/3 or 1/5 of their inspector corps annually. In CCOF's case, we would perform 2 or 3 with the most active inspectors, or those who carry the highest risk, based on factors such as they perform high numbers of inspections or they are new and in need of greater oversight. This would increase our overall number dramatically but also allow us to focus on the areas we see the most value in.

This ensures NOP is actually strengthening the requirement while giving critical flexibility in implementation. This risk-based model has been a huge success in the residue testing rule. This would likely be much more achievable for small and international certifiers while contributing to quality improvements.

- 4) **Allow ACAs to use the evaluations from other certifiers or contract evaluators. Alternatively, allow this for at least some percentage of field evaluations.** This appears to be a strongly felt need among certifiers. CCOF has some need for this but we do not intend to rely mainly or solely on this. A prohibition on this will negatively impact many certifiers. Additionally, while we do not currently rely on this method, we very much have valued the alternative perspective we've gotten in these settings.
- 5) **Require ACAs to provide reporting during their annual update of how many field evaluations they performed, of which inspectors and how they've complied with the instruction.** This would give NOP information on compliance and force certifier to report on which calculation or approach they took.

CCOF CS's concerns are principally based on the elements of a sound program, not cost of or effort concerns. We are committed to strong and effective field evaluations but want a smart program that allows focus where it is needed most.

Please do not implement a one size fits all model. We encourage you to carefully consider a model where responsible certifiers can deliver better outcomes within rational boundaries and clear expectations.

Sincerely,

Jake Lewin
President

CCOF Certification Services,

Cc: Miles McEvoy, Deputy Administrator





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Analysis of CCOF 2015 inspections:

Analysis

Total Inspections

4113

Average # per inspector

60

Median # per Inspector

39

Inspector #	Inspections Performed	Inspector	% of inspections observed if 1 is subjed to field evaluation
1	206	5.009%	0.49%
2	195	4.741%	0.51%
3	191	4.644%	0.52%
4	180	4.376%	0.56%
5	179	4.352%	0.56%
6	175	4.255%	
7	165	4.012%	
8	165	4.012%	
9	149	3.623%	
10	143	3.477%	
11	127	3.088%	
12	124	3.015%	
13	123	2.991%	
14	117	2.845%	
15	101	2.456%	
16	95	2.310%	
17	90	2.188%	
18	90	2.188%	
19	86	2.091%	
20	85	2.067%	
21	83	2.018%	
22	79	1.921%	
23	72	1.751%	
24	58	1.410%	1.72%
25	58	1.410%	1.72%
26	57	1.386%	1.75%
27	55	1.337%	1.82%
28	52	1.264%	1.92%
29	49	1.191%	
30	46	1.118%	
31	45	1.094%	
32	44	1.070%	
33	41	0.997%	
34	41	0.997%	
35	39	0.948%	
36	35	0.851%	

Inspector #	Inspections Performed	Inspector	% of inspections observed if 1 is subjed to field evaluation
37	35	0.851%	
38	33	0.802%	
39	32	0.778%	
40	31	0.754%	
41	27	0.656%	
42	25	0.608%	
43	24	0.584%	
44	23	0.559%	
45	21	0.511%	
46	20	0.486%	
47	17	0.413%	
48	17	0.413%	
49	16	0.389%	
50	15	0.365%	
51	15	0.365%	
52	14	0.340%	
53	12	0.292%	
54	11	0.267%	
55	11	0.267%	
56	11	0.267%	
57	11	0.267%	
58	8	0.195%	
59	8	0.195%	
60	8	0.195%	
61	7	0.170%	
62	4	0.097%	
63	4	0.097%	
64	3	0.073%	
65	3	0.073%	33.33%
66	2	0.049%	50.00%
67	2	0.049%	50.00%
68	2	0.049%	50.00%
69	1	0.024%	100.00%

