



CCOF

Organic Certification

Education & Outreach

Political Advocacy

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-17-0057-0001

Re: Compliance, Accreditation and Certification Subcommittee: Inspector Qualifications Proposal

April 4, 2018

Dear Ms. Arsenault and NOSB,

Thank you for the opportunity to comment on the Compliance, Accreditation and Certification Subcommittee's proposal: "Inspector Qualifications."

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 provides the attached comments and recommendations based on our experience working with 70 organic inspectors who complete about 5,000 inspections annually. CCOF's staff and contract organic inspectors are highly qualified professional auditors who possess a combination of relevant education and work experience in crops, livestock, and/or processing and handling. Newly contracted CCOF inspectors complete several apprentice inspections with experienced inspectors. CCOF also regularly evaluates inspectors on a tiered schedule. CCOF also requires 16 hours every two years of continuing education for all inspectors in addition to providing regular open house events and updates via webinars.

Overall, existing training and certifier hiring practices are sufficient to ensure a skilled, qualified inspector workforce. In CCOF's experience, it would be an extremely rare situation where an inspector intentionally or mistakenly allows a fraudulent organic activity to occur. While a basic registration system could be useful, CACS should not recommend a complex licensing system or other prescriptive requirements. Rather, CACS should ensure that certifiers maintain flexibility to make hiring decisions based on a range of factors, including their unique business needs and the applicant's educational background and relevant work experiences.

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

Sincerely,

Kelly Damewood
Director of Policy and Government Affairs

cc: Cathy Calfo, Executive Director/CEO
Jake Lewin, President, CCOF Certification Services, LLC

CCOF's Responses to the Questions from the Inspector Qualifications Proposal

The following comments are based on CCOF's experience contracting 70 inspectors across North America to perform about 5,000 inspections annually.

i. Are the criteria and qualifications laid out in the ACA Best Practices for Inspector Qualifications sufficient to establish a baseline for inspector competency? What changes do you suggest?

Yes, the criteria and qualifications laid out are sufficient to establish a baseline for inspector competency.

CACS should not recommend overly prescriptive inspector qualification requirements because most certifiers already have rigorous screening and training requirements. If NOP sets prescriptive requirements for inspectors, such as minimum education requirements, then it could inadvertently disqualify a range of talented inspectors who may have sufficient work experience or other relevant backgrounds.

Additionally, inspectors need flexibility to develop skills and training in a wide range of production systems and steps along the supply chain. For example, a crops inspector may learn the skills and take trainings to inspect processing facilities. If the requirements for inspection of each scope or production area are overly prescriptive, then inspectors may not have the opportunity to develop their skills, advance their careers, and support expanded inspection services for organic producers. Most importantly, the organic inspection system would not support the costs of complying with overly prescriptive requirements.

CCOF has a range of experiences working with auditing programs outside of organic certification, such as food safety. In our experience, programs with overly prescriptive requirements drive up certification and inspection costs, require multiple audits at a single site, and create severe auditor shortages. Therefore, CACS and the NOSB should carefully consider how overly prescriptive requirements would drive up costs and inadvertently disqualify skilled inspectors.

Ultimately, certifiers need flexibility to make their own hiring and contracting decisions as well as to design appropriate training programs for their businesses.

ii. What other resources are available to train new and seasoned inspectors?

Many resources exist for new and seasoned inspectors. The Accredited Certifiers Association, Inc. (ACA) provides an annual training to ensure the integrity of organic certification and to develop uniform criteria for the implementation of the organic standards. CCOF and other certifiers provide inspectors with continuing education and trainings. The International Organic Inspectors Association (IOIA) also provides webinar and onsite trainings.

iii. Should there be a licensing system for inspectors by scope and/or scale in recognition of their specific skills? How do you think such a system should work?

No, CACS should not recommend a licensing system for inspectors. Licensing would create an overly complicated, cumbersome process for inspectors and certifiers. It would also unnecessarily require an annual licensing fee for inspectors. Most certifiers already have effective hiring and training programs based on their business needs, such as securing inspectors in underserved regions of the United States as well as their clients' unique business models and certification scopes. Moreover, NOSB should recognize that an inspector licensing program would result in higher certification fees for all scales of producers.

If CACS would like to pursue a system for organizing and tracking inspectors, then it should recommend a basic inspector registration system. Certifiers could maintain the registration system and list the names of inspectors with the scopes the inspector audits. Certifiers can also provide registration information to the NOP. The registration system could facilitate communication, lead to better attendance at trainings, and provide more direct engagement from NOP. For these reasons, a registration program is a better option than a licensing program, which has no funding or long-term maintenance plan.

iv. While this document focuses on inspectors, what other roles should the CACS consider (e.g., initial and final reviewers as well as other certifier personnel)?

CACS should not consider any other roles because existing hiring and training practices are effective for certification personnel.

The only area of qualifications for certification personnel that may be helpful to consider are how certifiers train staff who oversee specialized industries. For example, NOP should ensure that certifiers who certify importers and global companies have staff who are familiar with federal agencies that oversee borders, customs, and ports. NOP should not prescribe specific training requirements; rather, it can review certifiers' training and professional development programs during their regular audits.

v. What models from other industries that facilitate high quality personnel through training and oversight could the organic industry emulate?

The organic industry should not emulate the inspector requirements of food safety certification systems. While it is appropriate for food safety certifications to set prescriptive qualifications for inspectors, organic certification does not pose the same level of health and public safety risks as food safety. In addition to organic certification, CCOF also provides food safety certification to the GLOBALG.A.P. standards. It is incredibly challenging to hire and train inspectors to the GLOBALG.A.P. standard. If a similar bar was set for organic inspectors, then there would be countless organic producers without access to a local, affordable inspector.