



April 4, 2018

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Avenue, SW
Room 2642-So., Ag Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-17-0057

RE: Certification, Accreditation, and Compliance Subcommittee – Inspector Qualifications (Proposal)

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Certification, Accreditation, and Compliance Subcommittee's (CACS) proposal on inspector qualifications.

The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing over 9,500 organic businesses across 50 states. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's mission is to promote and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA Position

The Organic Trade Association recognizes inspectors as a critical component to the organic industry's oversight through the certification process. Inspectors should be qualified and experienced with the types and scale of operations they are inspecting. Development of an accepted set of expectations and qualifications for inspectors is necessary to maintain strict oversight of organic operations, especially as the organic industry continues to grow both domestically and overseas.

We strongly support the criteria and qualifications laid out in the Accredited Certifiers Association's Best Practices for Inspector Qualifications. We also strongly support the need for a licensing or certification system for inspectors by scope and scale, as this will ensure inspectors have achieved a base-line understanding of the requirements and process unique to organic certification and would provide a mechanism for preventing inspectors from inspecting operations for which they do not have adequate expertise and experience. We also would strongly support a requirement that agencies or organizations who issue these licenses or certifications for inspectors be accredited under an appropriate ISO accreditation program.

ISO accreditation would ensure that the groups licensing inspectors are evaluating inspectors' proficiency and qualifications consistently and could create a mechanism for revoking licenses should an inspector consistently fail to perform his or her duties adequately. The National Organic Program currently requires ISO accreditation for Material Review Organizations that are not also Accredited Certifying Agents (e.g.



Organic Material Review Institute and California Department of Food and Agriculture), which ensures material review decisions are made consistently and professionally. A similar level of consistency and professionalism should be expected of the organizations training organic inspectors.

CACS requested input on whether the subcommittee should consider qualifications for other certification staff, such as reviewers. OTA believes all certification staff should be qualified for the decisions they are making in regards to organic compliance, and they should be trained by accredited organizations. Typical practice in the organic industry is for Accredited Certifying Agents to train and employ review staff and some or all of their inspection staff. Training performance evaluations conducted by Accredited Certifying Agents should be accepted as this is done under the oversight of USDA's accreditation process. We believe that any contractors working for an Accredited Certifying Agent, whether in a reviewer or inspector capacity, should be required to be licensed by an organization that maintains an ISO accreditation. CACS could consider further work in this area by developing recommendations around accreditation requirements for organizations which license inspectors and reviewers.

Conclusion

Overall, OTA supports the criteria and qualifications laid out in the Best Practices for Inspector Qualification referenced in the proposal. We strongly support a requirement that inspectors be licensed or certified for the scope and scale of operations they are inspecting, and we believe that the licenses or certifications should be issued by organizations that have obtained an appropriate ISO accreditation. While this may pose a barrier for new inspectors to enter the organic field, it is essential for inspectors to be qualified in order to maintain trust and confidence in organic's oversight and compliance mechanism.

On behalf of our members across the supply chain and the country, OTA thanks the National Organic Standards Board for the opportunity to comment, and for your commitment to furthering organic agriculture.

Respectfully submitted,

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Farm Policy Director
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association