



October 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-18-0029

RE: Training and Oversight of Inspector and Certification Review Personnel (Proposal)

Dear Ms. Arsenault:

Thank you for this opportunity to provide comment on the Compliance, Accreditation and Certification Subcommittee's Proposal on Training and Oversight of Inspector and Certification Review Personnel.

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.

The Organic Trade Association strongly supports passing the proposed Guidance titled "Inspector and Certification Review Personnel Training and Oversight" at this fall meeting. The proposal is thoughtful, well-written and takes into consideration the comments received in spring 2018. We support the topic areas and specific skills that are identified, and the variety of approaches recommended to further strengthen the skills and abilities of the inspector pool and certification review personnel. The proposal should provide the National Organic Program with clear examples of training that can be incorporated into USDA's Learning Management System and help bolster the certification system on the whole.

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,

Gwendolyn Wyard
Vice President, Regulatory and Technical Affairs
Organic Trade Association

cc: Laura Batcha
Executive Director/CEO
Organic Trade Association