



Accredited Certifiers Association, Inc.

*Accredited certifying agents working together to ensure
the integrity of organic certification in the United States*

February 20, 2014

Miles McEvoy, Deputy Administrator
National Organic Program
U.S. Department of Agriculture
Room 2646-So. (Stop 0268)
1400 Independence Avenue SW
Washington, DC 20250

Dear Miles,

Attached please find an Accredited Certifiers Association White Paper pertaining to our Working Group comments regarding the National Organic Program (NOP) Instruction Document NOP 2027 *Personnel Performance Evaluations* of August 2013. Our comments focus on Section 3.2.b *Field Evaluation (for inspectors only)*.

If you have questions, please feel free to contact me.

Regards,

Patricia Kane
ACA Coordinator



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An ACA White Paper Field Evaluation of Inspectors

2.2014

A. Background

The National Organic Program (NOP) released Instruction Document NOP 2027 *Personnel Performance Evaluations* in August 2013. This Instruction Document identified the procedures to be used for evaluation of staff and contract workers. Section 3.2.b *Field Evaluation (for inspectors only)* identifies the requirement that ACAs evaluate inspectors during an on-site inspection, at the ACA's expense. ACAs have identified this as a new requirement in the staff/contractor evaluation process.

The Accredited Certifiers Association (ACA) formed a Working Group of interested members, which also included a representative of the International Organic Inspectors Association (IOIA), to address this particular section of the NOP 2027 Instruction Document. There is agreement that ACAs realize the value of witness audits to the integrity and credibility of the certification process.

In the Introduction to the Program Handbook, in the Legal Effect section, it is noted that:

The documents contained in the Program Handbook provide a uniform method for operations to comply that can reduce the burden of developing their own methods and simplify audits and inspections. Alternative methods that comply with the Act and its implementing regulations are acceptable, however, the NOP strongly encourages accredited certifying agents and certified operators to discuss alternative approaches with the NOP prior to implementing them (*emphasis added*).

Some ACAs currently conduct periodic field evaluation of inspectors, and some do not. ACAs who do conduct field evaluations have differing methods to determine the frequency, either by a risk assessment scheme or by a set schedule, such as every X years.

B. Practical considerations calling for flexibility guided by common criteria

Many certifiers draw from a common network of contract inspectors rather than staff employee inspectors. Typically the same contract inspectors work for multiple certifiers. A strict requirement of "an annual field evaluation for all inspectors" would lead to multiple evaluations for many inspectors. These multiple evaluations will consume many additional resources.

The geographic location of inspectors is frequently a major factor by which certifiers assign particular inspections. This is partly due to the fact that inspection travel costs affect the affordability and accessibility of organic certification, especially to the smaller organic operations. Certifiers frequently maintain contracts with strategically located inspectors even when those inspectors only do a small number of inspection assignments annually. Furthermore it is these inspectors who tend to be more remotely located from the central activity region of the certifier. For these reasons ACA members are concerned that implementation of a rigid requirement for annual field evaluations by each certifier of each of its inspectors for each scope is neither necessary

nor sensible. It would likely imperil a significant portion of relationships between contract inspectors and certifiers, resulting in a reduction of service capacity to the organic industry, with the preponderance of adverse effects on remote and smaller operations.

C. Proposed Approaches

1. Risk Assessment

Certifiers develop systems to determine the number and frequency of witness audits required for individual inspectors based on assessment of the following risk factors:

- number of inspections conducted annually
- performance reliability of the inspector based on certifier's review of inspection work
- high risk factors such as being new to inspecting or new to specific scopes

This approach can be implemented by certifiers in relatively short time frame.

2. Third Party Field Evaluations

This approach would both mitigate and leverage the situation of contract inspectors who work for multiple certifiers, may be remotely located from some of those certifiers, and may do just a small number of inspections for some of those certifiers. Recognition and acceptance of third party field evaluations is a process that will require an extended time for development and implementation.

Examples of third party evaluation systems could include:

- a) Mutual acceptance of the field evaluations among accredited certifying agencies. This would require development of procedures and norms, such as baseline field evaluation content and documentation, whether certifiers can decide which certifier's evaluations they recognize, etc.
- b) Expansion of the International Organic Inspectors Association's Accredited Inspector Program to include field evaluations. IOIA is considering developing their Accredited Inspector program to include field evaluations, in the wake of Instruction Document NOP 2027.
- c) Other entities yet to be identified

D. Recommended Baseline Content of Inspector Field Evaluations

- Knowledge of the NOP regulations
- Knowledge of the management and business practices for the type of operation being inspected
- Knowledge of the certifier's process and procedures
- Ability to identify noncompliance issues, and to communicate those findings effectively to both the producer and the certifier
- Execution of required inspection procedures (e.g. opening meeting, exit interview)
- Effective and appropriate interpersonal skills
- Exercise of appropriate discretion in the depth and scope of all audit activities
- Identification of areas requiring continual improvement and/or additional training

E. Conclusion

Members of the Accredited Certifiers Association and the International Organic Inspectors Association recognize the value of and support the use of field evaluations of inspectors. We believe that the *Personnel Performance Evaluations* Instruction Document (NOP 2027) provides the necessary flexibility for certification agencies to develop an evaluation system appropriate to their organization that meets the new requirement of the Instruction Document.

We also believe that annual field evaluations of each inspector by each certifier would not be sound and sensible, and that the development of a credible, streamlined evaluation process is needed for the long term sustainability of the certification process. We support IOIA in adding field evaluations to their inspector accreditation program to meet this need. We request that the National Organic Program indicate their position and guidance in this regard as this will be a necessary precursor for the development and acceptance of the IOIA Inspector Accreditation Program as a third party option for field evaluations.