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November 10, 2011

Lorraine Coke
National Organic Standards Board
USDA-AMS-TMP-NOP
1400 Independence Ave., SW.,
Room 2646-So., Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-11-0081; NOP-11-15

**RE: NOSB Compliance, Accreditation & Certification Committee Recommendation for
Inspector Qualifications**

Dear Ms. Coke:

Thank you for the opportunity to provide comments to the National Organic Standards Board regarding the Compliance, Accreditation & Certification Committee Recommendation pertaining to Inspector Qualifications.

The Accredited Certifiers Association (ACA) represents 40 USDA Accredited Certifying Agents, both foreign and domestic.

The ACA welcomes and appreciates the work of the Compliance, Accreditation and Certification Committee on the topic of Inspector Qualifications. The ACA generally supports the work and direction of the Inspector Qualifications Recommendation and believes that these requirements are achievable and will result in an improvement of the certification system.

In the review of the Inspector Qualifications Recommendation, the ACA Working Group identified issues of concern and these are noted below.

- 1) There are several statements in the Discussion section of the Recommendation that the Accredited Certifiers Association believes should be revised:
 - a) The Accredited Certifiers Association members support the efforts of the International Organic Inspectors Association in the training of organic inspectors, but we do not believe that this should be the only recognized training program for organic inspectors. Any organization that can meet the criteria for training of inspectors should be permitted to enter into a Memorandum of Understanding with the NOP to provide training for organic inspectors.

- b) Accredited Certifiers Association members indicate that the qualifications of all certification personnel are reviewed during NOP accreditation audits, whether the staff are contractors, employees, or part-time inspectors.
- c) While private ACAs have the option to revise budgets to reflect new requirements, many state certification programs are limited by regulatory requirements and may not be able to revise budgets. In addition, some state governments have initiated out of state travel bans due to budget concerns. We agree that the lack of attendance of state (and private) certification agencies at trainings provided by the National Organic Program does not provide a level playing field.

Clarification is needed from NOP regarding whether NOP training programs are mandatory for all ACAs.

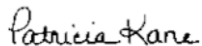
- d) The Accredited Certifiers Association believes that the inspection of wild crops is not necessarily simply a subset of crop production, but does need specialized training in order to assess the environmental impacts of the harvesting of wild crops. We would also point out that while wild crop harvesting may be of minor prevalence in the US, wild crop harvesting in areas outside of the US is a major cropping system.
2. Regarding Section A.1.a of the Recommendation we suggest that all types of production and processing training be permitted, not just organic, as the knowledge of conventional production and processing practices is also necessary for the organic inspector. In addition, other forms of work experience (such as food safety, HACCP, Good Agricultural Practices) should be included in the allowance for pre-requisite knowledge, as this background can be built upon further to include organic inspection. Our suggested wording for this section is:
 1. Baseline pre-requisite knowledge and expertise for initial ‘organic inspector’ status.
 - a. Minimum two years of combined work experience, education, and training in ~~organic~~ agricultural production and processing, applicable to the scope of inspections to be initially performed: crop, wildcrop, handling, or livestock. Work experience can also include food safety, HACCP and Good Agricultural Practices background.
 3. In regard to the Inspector Qualification Recommendation, Section A.1.d, the Accredited Certifiers Association is interpreting this section as referencing the apprenticeship of the new and / or inexperienced inspector, rather than an experienced inspector newly hired by an ACA. Newly hired experienced inspectors would not generally conduct shadow inspections followed by witness inspections. We suggest this section be clarified to reflect that this applies only to new and / or inexperienced inspectors.

For experienced inspectors adding a new scope to their inspection activities, it is common practice for ACAs to require IOIA Training pertinent to the new scope, and mentoring with an inspector experienced in that scope.

4. In Section B.1.a, the Accredited Certifiers Association believes, that “annual training by Accredited Certifiers Association (ACA)” is an error, as the Accredited Certifiers Association does not provide training to inspectors. We believe that this should simply be ACAs.
5. The Accredited Certifiers Association believes that the training provided by ACAs should be applied towards the continuing education requirements of inspectors provided the trainings are not specific to use of certifier forms or other procedures specific to that one certifier. Many of the trainings provided by ACAs are of a specific nature, such as the pasture rule trainings; the trainings do not just reflect the ACAs policies and procedures. ACA members believe that background information training, as well as training specific to the scope of inspection, should be encouraged as part of continuing education for inspectors.
6. The Recommendation does not specify the qualifications which are necessary to conduct witness audits. ACAs may not have sufficient numbers of trained certification management and senior reviewers to oversee the witness audits. We suggest that qualifications for conducting a witness audit be included in the Recommendation, along with a provision for contracting out witness audits to qualified individuals.
7. While the Accredited Certifiers Association generally supports the Inspector Qualifications Recommendation, we are concerned with the increasing requirements and the costs associated with meeting those requirements. Increased costs associated with certification are generally passed along to the operators, and with several new requirements in the pipeline (pasture rule, proposed residue testing, unannounced inspections, etc.), there may need to be substantial cost adjustments. We suggest that the NOSB Compliance, Accreditation and Certification Committee review mechanisms that would not increase the costs. This would include emphasizing the use of webinar presentations in training of inspectors (and ACAs) to reduce travel costs.

The ACA believes that the development of inspector qualifications will provide a consistency across the board that will improve inspection and certification. We thank the National Organic Standards Board for the opportunity to provide feedback on this topic.

Sincerely,



Patricia Kane
ACA Coordinator