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October 3, 2018

Ms. Michelle Arsenault, Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. S.W.
Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Docket: AMS-NOP-18-0029

Certification, Accreditation, and Compliance Subcommittee - Inspector Qualifications and Training

Dear Ms. Arsenault,

Oregon Tilth thanks the National Organic Standards Board (NOSB) and the Certification, Accreditation, and Compliance Subcommittee (CACS) for their continuous work on this topic and expanding upon the work that has already been done in the area of inspector qualifications. We agree that the suggested approaches in this proposal are a step toward improved standardization and enhanced resources to develop and maintain high-quality organic inspectors.

We support the work that the Accredited Certifiers Association (ACA) and International Organic Inspectors Association (IOIA) have done with the *ACA Guidance on Organic Inspector Clarifications* and direct the NOSB to this work for foundational information. Please refer to our comments from the Spring 2018 Meeting regarding inspector qualifications for details about Oregon Tilth's approaches to some of these issues and what we expanded on beyond the ACA document.

Oregon Tilth would like to provide feedback on the following recommended approaches from the proposal:

- 1. The current system of training inspectors on the organic regulations through the International Organic Inspectors Association (IOIA), the Accredited Certifiers Association (ACA), and individual certifiers should be improved and become more standardized. This would improve professionalism and confidence in our system. Accreditation of training programs through a third party such as ISO should be a long-term goal. A cost/benefit analysis of this accreditation should be completed. The NOP could fund a task force to develop a baseline curriculum and attendee testing protocols, using templates from other sectors of the food industry.*

We agree that there should be standardized training for inspectors. Our comments from the Spring 2018 NOSB meeting on inspector qualifications also supported a licensing system for inspectors and detailed our suggestions on how the system could work. We cannot emphasize strongly enough that certifiers must provide critical input for inspector training development. Ultimately, certifiers are responsible for



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ensuring the inspectors they work with are well-trained and qualified for a wide variety of inspection assignments. Oregon Tilth's first-hand experience in inspection work is a high-value, on-the-ground resource for training and resource development.

Cost is a serious consideration and having the NOP perform a cost/benefit analysis would prove valuable. We continuously work towards providing a balance between cost and service; cost should not be a barrier to certification. Additional costs for certifiers become a shared burden for certified operations. While change is needed, we must ensure certification can remain accessible and affordable.

A natural next step for improvement to inspector training would be the incorporation of ISO-developed training modules. Inspectors require additional support and knowledge to be well-qualified and prepared to perform increasingly complex audits. The *ACA Guidance on Organic Inspector Qualifications* incorporates such training into the recommendations.

2. *The USDA should provide organic inspectors and certification review personnel access to the Learning Management System. The following areas, available through LMS, would be most appropriate to the organic industry: investigative skills, auditing, organic regulations, and other items as needed.*

As a nonprofit certifier, Oregon Tilth is not familiar with the LMS system and have only been provided some basic information about it through USDA NOP communications. ACA supports the use of the system and is currently in discussions with the NOP about collaboration. We feel it is important to ensure that input from certification agencies is considered in the development of the LMS system and partnership with the ACA is a good way to capture certifier feedback. Oregon Tilth commented at the Spring 2018 NOSB meeting on the need for additional areas of training that support the work an inspector does beyond the items noted above, such as cybersecurity, personal safety and awareness, and effective communication. For more details beyond the areas identified in suggestion number two, please refer to the *ACA Guidance on Organic Inspector Qualifications*, as well as Oregon Tilth's comments from the Spring 2018 NOSB meeting.

3. *The USDA could facilitate the development of a practical and comprehensive apprenticeship/mentor/peer mentor program, to enhance the skills of all levels of organic inspectors and review staff. This could include one-on-one in-person mentorships, long-distance communication and learning through conference calls or webinars, and online courses with testing.*

Oregon Tilth agrees that a comprehensive apprenticeship/mentor/peer-to-peer program is essential to ensure inspectors and reviewers get the specialized training and support needed to perform inspections in an evolving industry. We believe that this type of experience is extremely valuable and support its development by the USDA NOP. As with the other suggested areas of this proposal, we ask that certifiers be consulted when developing such a program.

In-person mentoring provides an unmatched learning opportunity — classroom and webinars are unable to impart person-to-person knowledge-sharing in the same way. A live inspection presents multiple



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challenges, some that can be prepared for and others that are unpredictable and unexpected. These challenges require inspectors to call upon a wide variety of skills and knowledge to meet in-the-field issues head-on. For example, an inspector will need to exhibit critical thinking, relationship management skills, and flexibility to name a few. While in-person training opportunities are crucial, they can be the most challenging to set up. Inspectors can be reluctant to provide mentorship opportunities for fear of loss of work doing inspections themselves, as well as the logistical challenges when organizing mentorship opportunities and linking two, or more people up to do in-person, live inspection training.

4. *A standardized system of tracking inspector skills, background and knowledge should be developed, to aid certifiers in choosing appropriate inspectors for specific jobs. This could also encourage inspectors to improve their resumes with continued education, such as taking an accounting course at a local technical college. This would then be added to their list of skills. This information should be publicly available.*

5. *A standardized system of inspector and reviewer feedback should be developed for use by organic certification agencies, to provide consistency and confidence in how inspectors are chosen between various certifiers.*

On the whole, Oregon Tilth supports recommendations four and five. A comprehensive tracking system could be beneficial for inspectors, as well as certifiers. Matching an inspector to a specific type of operation can be challenging depending on the available skills in a certifier's talent pool. A tracking tool simplifies the selection and skill search process for all certifiers. There are questions on feasibility and practicality for creation and implementation of such a tool, in particular, if without USDA-led financial and technical support.

Standardized inspector and reviewer feedback are necessary for professional development. Certifiers provide feedback to inspectors and reviewers annually as is required by *Instruction NOP 2027*. Oregon Tilth uses additional feedback methods for inspectors to provide timely input from certified operations, reviewers evaluating inspection reports, and other mechanisms such as field evaluations. Timely and constructive feedback is a critical element for inspector development and feedback channels must be prioritized in any systems development.

While Oregon Tilth supports the two recommendations, we would like to ensure that certifiers remain a part of the development process. Standardization can increase consistency, but it can also become burdensome. Certifiers and inspectors must be involved in the development process and implementation of such systems, especially if information will be publicly available.

6. *This process of inspector oversight and training subject areas should be continually improved and updated by the NOSB and NOP, to address issues as they arise.*

We agree that continuous improvement is important in this area.



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Overall, we are encouraged by the effort being put forth by the NOSB to strengthen the expectations of professional development for organic inspectors and to also establish tools to assist in this development. We strongly recommend that certifiers continue to be included in the discussion and development of these expectations and tools, leveraging our first-hand knowledge of the how the work that inspectors do impact the organic industry.

Respectfully submitted,
Oregon Tilth

Oregon Tilth is a leading certifier, educator and advocate for organic agriculture and products since 1974. Our mission to make our food system and agriculture biologically sound and socially equitable requires us to find practical ways to tackle big challenges. We advance this mission to balance the needs of people and planet through focus on core areas of certification, conservation, policy and the marketplace.