



PO Box 368 | Corvallis, OR 97339 | [www.tilth.org](http://www.tilth.org) | PH 503.378.0690 | FX 541.753.4924 | [organic@tilth.org](mailto:organic@tilth.org)

April 2, 2021

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

**RE: Docket Number AMS-NOP-20-0089  
Compliance, Accreditation, & Certification Subcommittee (CACS): Human Capital Management:  
Strategy for Recruitment and Talent Management Organic Inspectors and Reviewers Proposal**

Dear Ms. Arsenault:

Thank you for the invitation from the most recent discussion document on Human Capital Strategy for Organic Inspectors and Reviewers to provide comments and suggestions on this crucial and pivotal topic. Maintaining a strong, professional cadre of organic inspectors and personnel is critical to the viability and future success of the organic industry. We appreciate the subcommittee's work on this topic and recognize that it has made significant strides toward identifying the recruiting and retaining qualified inspectors.

We seek to answer the questions reiterated in the latest discussion document and to comment on the aggregated information obtained from inspectors. We respectfully submit our comments from the unique perspective of an organic certifier that has taken on the challenge of a shortage in the field of inspectors and reviewers with the strategy of redesigning our inspection team from being primarily external contractors to an internal department of full-time employees.

**1. What have you experienced or witnessed that contributes to the shortage of organic inspectors/reviewers?**

From the Perspective of Our Independent Contractors; Most of the information we have received from contract employees mirror the comments that are presented in the CACS's proposal dated January 12, 2021.

### Contractors report that the inspector base is aging.

- There are many qualified professionals with years of inspection experience that are retiring or changing careers because they are no longer able or willing to work the hours imposed upon an organic certification inspector.
- As contractors age, health insurance coverage offered by employers becomes increasingly more important due to age-related health issues.

### Inspection work generally imposes a high demand for travel away from home.

- Frequent travel negatively impacts health.
- Traveling away from home places stress on family and limits social interactions with friends.

### It is difficult to see how working as a contract inspector fits into and will advance their careers.

- For new inspectors without experience or necessary qualifications, there is no clear place to gain experience or additional mentoring. For example, an inspector can go to IOIA training, but what then?
- Both the ACA and IOIA have put on record that the industry is experiencing a shortage of qualified inspectors, despite most certifiers experiencing double digit growth. Even so, the industry has failed to develop growth opportunities and to establish clear career pathways for contract inspectors.

### Compensation is not competitive.

- Race to bottom. Inspectors are in competition with each other for work – or feel like they are. As a result, inspectors will often bid to contract work at a lower rate in order to “win” more work. The result is that the contractor’s work is undervalued and does not reflect the real cost of performing the work.
- Flat rate inspections. Some certifiers or inspectors negotiate for flat rate inspections. The result of contracting for a flat rate is that difficult, complex or problematic inspections requiring more time than originally contemplated are rushed in order for the inspector to receive the amount of compensation originally expected and the quality of the inspection is diminished.
- Bidding on inspections. Some certifiers put inspections out for bid. This practice drives costs down by selecting lowest bid rather than opting for the most qualified or appropriate inspector.

## From Our Perspective as an Employer

### Recruiting Challenges

- It is difficult for certifiers to find qualified contractors. Some contractors undergo IOIA training but then have no mentorship or job opportunities to gain experience and hone their skills.
- Certifiers do not want to invest in mentoring and training for contractors because it is expensive, time-consuming and there is no guarantee of a continued work relationship or “return on the investment.”

### Managing Quality Control

- When working with contract inspectors, the law does not permit a certifier to direct and control a contractor’s work the same way as it would the work of an employee. This leads to more variations in the returned work and less control on the quality and consistency in the overall inspection work.
- Organic inspections require specialized skills and abilities. Contract inspections cannot be performed by someone from a temp agency or by a “trained” inspector without the requisite organic skillset. These positions require extensive training and continuous development, and there is not a lot

of access or opportunity for this. As a result, the responsibility to ensure proper training and education falls to the contracting certifiers. Again, an investment on the certifiers part that increases costs without a guaranteed return on the investment.

### Solving and Resolving Issues

Oregon Tilth has addressed many of the issues referenced above—career stability, insurance coverage, more localized travel, guaranteed returns on training, and fair and competitive salaries—by hiring full-time employees to perform its inspections. However, hiring inspectors as employees rather than contracting with them as an independent contractor does not eliminate the need for a body of qualified inspectors from which to recruit and fill full-time positions – be it for an inspector or a reviewer position.

## **2. What are some additional strategies that can be employed to increase the numbers of organic inspectors and reviewers?**

### Maintain Existing Inspector/Reviewer Levels.

A necessary step in the formulation for increasing numbers of organic inspectors and reviewers is a pre-emptive one—a step that is often overlooked or, at least, overshadowed by focusing on *increasing* the number of bodies coming into the organic certification field. However, maintaining or building the available pool of qualified organic inspectors is contingent upon slowing the number of inspectors and reviewers leaving the field. If the exodus of qualified inspectors/reviewers is not reduced, to make any impactful gains in building an accessible, viable group of qualified individuals will be frustrated. New arrivals to the pool of qualified inspectors and reviewers will only compensate for departures rather than expand the numbers. To build a stronger, more accessible pool from which to select qualified inspectors/reviewers, *the current ones need to stay.*

### Low Hanging Fruit.

Another reason for motivating existing individuals to continue in their careers as inspectors and reviewers is that they make up a very large part of the universe of qualified and experienced inspectors and reviewers. This large segment of the whole knows the industry. They know their jobs. They have established professional connections. They possess valuable knowledge and experience that is very costly and time consuming for certifiers to duplicate in individuals coming new to the industry. Seasoned inspectors/reviewers are a highly valued resource that the industry cannot afford to lose.

Oregon Tilth has been able to persuade experienced inspectors/reviewers to continue in their careers in the organic industry by offering full-time employment—providing the benefits and improved quality of life that inspectors/reviewers gave as their reasons for leaving the industry. By bringing on an inspection team of full-time employees, Oregon Tilth resolved or made improvements in the areas of career stability, insurance coverage, localized travel, training opportunities, and fair and competitive salaries. By doing so, we helped to stabilize the existing pool of qualified and experienced inspectors/reviewers and gained highly valued personnel.

## Establishing an Organic Inspection Career Path

The organic industry needs to establish and maintain career opportunities for inspection and certification review staff. Oregon Tilth suggests that this can be accomplished by:

- providing full-time employment opportunities to those currently working as independent contractors,
- creating universal or centralized training venues through IOIA, universities, and community colleges
- establishing mentorship programs that exist independent of certifying bodies, and
- creating a centralized, well-maintained location to post job announcements and training opportunities.

Finally, the pandemic has manifested, not only to the organic industry but to the entire business world, what can be done differently in order to effectively respond to ever-changing work conditions and employment challenges. As an example, virtual inspections have been conducted during the pandemic where only in-person inspections had been conducted previously. Rather than return to the status quo, it is incumbent upon the organic industry to identify and utilize the “new” resources and methods illuminated by the pandemic having in mind the goal to improve the organic certification process and the conditions in which the staff driving the certification process work. As organic certification becomes more complex and globalized, the costs are increasing to ensure comprehensive compliance verification and protect organic integrity. Let’s use what we’ve learned during the past year of conducting inspections during a pandemic as an opportunity to evaluate new procedures that serve the goals of keeping certification accessible by controlling costs while also ensuring organic integrity and accountability. Oregon Tilth believes there are opportunities to explore conducting remote / virtual inspections (which eliminate travel expenses) in conjunction with on-site, in-person inspections, based on client-specific risk-assessments.

### **3. Are there appropriate ways for the National Organic Program to assist with the financial burdens?**

#### **a. Initial cost of becoming a trained organic inspector.**

- Work with colleges and universities to create a clear career option in organic certification as either an inspector or reviewer. This will allow for access to grants and student loans to support individuals with the cost of training and education.
- Establish a two-year trade school in organic certification that will reduce the time and cost of training/education.
- Support IOIA and ACA—Help direct and focus their work through ongoing collaboration and help to fund strategic initiatives that will help these dedicated organizations to support and establish ongoing programs to support the industry’s human capital needs.

#### **b. Costs of continuing education for existing experienced inspectors, and**

- Support IOIA and ACA—Help to provide funding and resources for additional Organic Integrity Learning Center (OILC) content and curriculum to develop more continuing education and advanced level inspection courses.

- c. Compensation for organizations and/or experienced inspectors to provide qualified one-on-one mentorships to beginning inspector/reviewers.**
- Establish a platform where inspectors and reviewers can connect as mentors/mentees (even outside of IOIA membership, since not all inspectors/reviewers are IOIA members).

Oregon Tilth thanks the NOP and NOSB for their efforts in addressing the complex issue of human capital and the work that went into developing this proposal. We appreciate having an opportunity to offer comments and to reiterate our support for working toward finding solutions to these timely concerns.

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, public health, policy and the marketplace.*