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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

RE: Docket: AMS-NOP-17-0057  
**Certification, Accreditation, and Compliance Subcommittee – Inspector Qualifications**

Dear Ms. Arsenault,

Oregon Tilth thanks the National Organic Standards Board (NOSB) and the Certification, Accreditation, and Compliance Subcommittee (CACS) for their continued work on recommendations for inspector qualifications. Our organization has been actively engaged in providing comment and feedback on inspector qualifications for many years. We believe that inspectors play a very critical role in the certification process and training and accreditation of inspectors is a top priority. We appreciate the opportunity to contribute to the discussion and recommendations and would like to provide input from an accredited certification agency's (ACA) perspective as requested.

Oregon Tilth Certified Organic (OTCO) is commenting on the following questions to provide feedback, as requested from the NOSB:

**1. Are the criteria and qualifications laid out in the ACA Best Practices for Inspector Qualifications sufficient to establish a baseline for inspector competency? What changes do you suggest?**

Yes, the ACA Best Practices on Inspector Qualifications is very detailed and OTCO supports this document. OTCO feels the criteria for qualifying inspectors are all critical areas for inspectors and the categories align with OTCO's own internal policies; the criteria include:

- knowledge of the regulation and systems
- skills/areas of expertise
- abilities
- personal attributes
- work and inspection experience
- training

We believe that the ACA Best Practices document outlines the baseline criteria for qualifying inspectors to do work for an ACA under the NOP.

One category of criteria we feel could be further defined is professional development and business management. This criterion includes further training for inspectors on general professional management items such as:

- independent contractor status,
- IRS implications,
- accounting 101,
- general business guidance,
- cybersecurity,
- personal safety and awareness,
- project and time management,
- effective communication and listening skills,
- diffusing negative situations, etc.

We understand this document mainly focuses on qualifications to specific scopes, however it could be further improved by incorporating some of the professional management attributes and training listed above.

## **2. What other resources are available to train new and seasoned inspectors?**

The list provided in the ACA Best Practices document is comprehensive and outlines many resources available to inspectors that cover agriculture, food science, organic and conventional practices, and general industry knowledge. As mentioned above, courses that focus on aspects of being an inspector outside of regulatory work would be useful in order to prepare inspectors for work in the field. These are a few examples of where we see additional training and resources that are still needed for development.

Inspectors can achieve a very well rounded and thorough training on the regulations and inspecting to them through the International Organic Inspectors Association (IOIA). Many certifiers, ourselves included, provide additional annual training for inspectors, or have inspector training modules that are used when onboarding new inspectors. We feel that IOIA and certifiers have developed and already provide very comprehensive scope specific trainings.

## **3. Should there be a licensing system for inspectors by scope and/or scale in recognition of their specific skills? How do you think such a system should work?**

Yes, OTCO feels there should be a licensing system. A licensing system would help ensure consistency of training and a similar knowledge base for all inspectors entering the field. An established baseline licensing system that certification bodies could use to license inspectors would help ensure that all inspectors, regardless of what certifier they work for, have the same minimum training. We believe that a licensing system outlined by the NOP, but carried out by certifiers and other nonprofits, would be beneficial to the industry.

Agencies such as ACAs, IOIA and/or others would apply to the NOP to gain approval on their individual licensing systems and training programs. With appropriate licensing, inspectors could then demonstrate a baseline understanding and training for organic inspections. Furthermore, within each scope there could be subcategories where specific skills can be acquired to meet the many nuances of the industry. For example, an inspector could be licensed to perform crop inspections but choose to specialize in greenhouse production by furthering their education and become licensed for crop inspection with an emphasis on greenhouse production.

An established license program for organic inspectors would provide the professional recognition outside of the industry desired by inspectors. As this profession evolves, it will become easier to access the necessary business tools that are currently difficult to acquire — i.e. professional, general, auto insurance.

**4. While this document focuses on inspectors, what other roles should the CACS consider (e.g., initial and final reviewers as well as other certifier personnel)?**

This document specifically is titled *Guidance on Inspector Qualifications*. While we feel training and development for certification staff handling reviews is also critical, adding commentary on how it could be useful for other rolls for certification personnel would only dilute the main goal of this guidance. We would encourage the CACS to focus this document on inspector qualifications and training.

**5. What models from other industries that facilitate high quality personnel through training and oversight could the organic industry emulate?**

Real estate appraisers are a great example of another profession that the organic industry can emulate. Their oversight and training strategies include new appraiser training, vetting supervisors who train the new appraisers, and instilling a sense of personal educational responsibility in each applicant in order to meet industry standards. Each state has a unique approach, but the licensing implementation is relatively the same. There is an application process, fee for the license, testing, and ongoing continuing education required every one to three years to maintain and renew the license. Here is a link to the Arizona Department of Financial Institutions Real Estate Appraisal Division.

[Arizona Real Estate Appraisers](#)

Another great example of a profession that the organic industry could emulate would be civil engineers. After completing a degree in engineering, they must take two initial exams before they can even submit an application for a license. The ongoing education is very specific and required every year, which adds to an engineers' portfolio for their license renewal every two to three years. This may be more of an example to reflect upon in the distant future as the organic industry grows more strength and develops more professional guidance like this ACA Document.

[Oregon State Board of Examiners for Engineering and Land Surveying](#)

We appreciate the thought and detail that the NOSB has put into developing criteria and increasing consistency of expertise and qualifications of inspectors. Continued work on this topic is invaluable and works to serve the entire organic community and strengthen the implementation and enforcement of organic standards.

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.*