



International Organic Inspectors Association

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November 13, 2011

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

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

RE: CACC –Inspector Qualifications

Dear Ms. Lorraine Coke:

Thank you very much for this opportunity to provide comment on the CACC Recommendations on inspector qualifications.

IOIA is a membership-based non-profit association of organic inspectors. IOIA's mission is to address issues and concerns of organic inspectors; provide quality inspector training; and promote integrity and consistency in the organic certification process. IOIA supports the CACC's Proposed Recommendations for Inspector Qualifications in spirit and in principle. We welcome the attention to the issue of inspector competency. For 20 years, IOIA has been dedicated to this mission. As noted in this recommendation, inspectors themselves are a critical link between the certified operators and the accredited certifiers.

As you point out in the discussion on page 4, training is essential "to prevent responsible ACAs from falling victim to certifier shopping based on costs which have been subsidized by systematic use of under qualified inspectors who charge less for their services." In IOIA's experience, appropriate training is indeed essential for both certifiers and inspectors. Some correlation exists between low-cost inspectors and low-quality inspections. ACAs and inspectors who invest time and money into training need to recoup their costs, and a non-level playing field makes that more difficult. Thank you for this effort to level the playing field.

We offer the following comments and suggestions:

General:

The language lacks specificity and the recommendations may be too general to bring about any desired change in inspector qualifications. As written, they offer too little change from the status quo. In the attempt to create a baseline that can be reasonably attained, this recommendation does not go far enough. We feel that the proposal needs more teeth. Our following suggestions and comments are given in that spirit. As an example, it is clear that you have attempted to address the appropriate assignment of inspectors to inspections with appropriate levels of complexity. However, if there is not a clear and consistent definition of different levels of inspectors, there will not be a level playing field between certifiers.

We are disappointed and surprised that IOIA was never directly contacted by the NOSB in the development of this Proposed Guidance, especially given that the original request included a reference to IOIA as a resource.

We liked the suggestion that NOP consider entering into a Memo of Understanding or other recognition agreement or contract with IOIA so that IOIA can be formally recognized and authorized by NOP. However, it is our understanding that any such agreement would need to leave open the opportunity for other organizations, in a similar way to how OMRI is currently recognized and acknowledged by NOP.

We recognize that the request from the NOP was only to address the issue of qualifications of inspectors. IOIA believes that qualifications of reviewers who do initial and final reviews are equally important.

Section A:

1. Overall, we support this section. However, it only addresses the activities and experience that an inspector must have, such as training and inspections. It fails to address other personal attributes, skills, and knowledge needed for quality inspections. We believe you have made an effort to address this in A.1.e., but we find the current wording inadequate. We encourage you to mention the other aspects of inspector qualifications, such as professionalism and ethics. In our experience, knowledge, experience, and training do not guarantee competent inspections. IOIA believes that the formalization of a comprehensive Inspector Body of Knowledge is needed. Whether developed by private sector or government, this would need sanction/endorsement by the NOP to truly achieve a more level playing field for certifiers.
2. In A.1.a., Baseline pre-requisite knowledge and expertise for initial “organic inspector” status, we request the following revision:

Minimum two years of combined work experience, education, and training in organic agricultural production or processing, applicable to the scope of inspections

to be initially performed: crops, handling, or livestock. This should include both organic and non-organic experience, education, and training.

IOIA finds that many of our course participants without relevant organic experience have become very good inspectors, provided they have a sound basis in agriculture or food processing, as applicable. IOIA requires knowledge of both conventional (non-organic) and organic practices as a criterion to attend inspector training.

3. In the discussion, you have stated, “each ACA must be able to justify why the specific inspector has been assigned to a particular operation and why they are qualified to perform the inspection.” We strongly agree. There is a need to address different levels of requirements for more complex operations (i.e. large dairy or multi-ingredient processes) in a systematic manner so that it can be monitored in the audits of certifiers. We encourage you to carry this forward from the discussion to Section C of the Guidance more clearly.
4. In A.1.b, you propose that baseline qualifications must include two of three (experience with the scope, education relevant to the scope, or training within the scope). In A.1.c., you require basic inspector training. We encourage you to clarify that the training referred to in b. is not ‘basic inspector training’ as described in c. If basic inspector training is one of the baseline qualifications, it would reduce the options in b. to two. We think you mean other types of training in A.1.b, but that is not clear.
5. In A.1.c., IOIA is referred to as the Independent Organic Inspectors Association, although earlier in the document, you used our current name, International Organic Inspectors Association.
6. In A.1.d., we support the shadow inspections, but the qualifications of ‘senior inspectors’ should be clarified better. Apprenticeship requirements by ACAs currently vary widely and there is no widely adopted standard for mentors of shadow inspections.
7. A.1.e. has a typo in the first sentence. Remove the word “a”?
8. In the discussion, page 5, you have stated, “the specific scope qualification criteria should be more flexible for an experienced inspector who is extending the scope of their existing qualifications.” We agree. We support your wording of this topic in A.1.f.

9. In the discussion, page 4, you have stated, “Wild crop harvesting, the fourth scope under the NOP, should be considered a subtype of crop production, as it is of minor prevalence, and an experienced crops auditor can effectively perform these inspections after a focused briefing on specific issues and standards related to wild crop harvesting practices.” IOIA urges you not to down-play the specific training required for this type of inspection. Inspecting wild crops is not easy, and verifying 205.207 requires specific skill and knowledge of ecology and biodiversity. Specific training should be required and documented for all wild crop inspectors. We do agree that it should not be onerous for the inspector or the certifier to access this training. We believe that this type of training could qualify an experienced crop inspector to perform wild crop inspections.

Section B:

1. In B.1.a., we believe you mean Accredited Certifying Agency (ACA) rather than Accredited Certifiers Association.
2. We support the emphasis on continuing education. In our experience, continuing education varies widely among inspectors after they complete basic training and start inspecting. While we support the need for continuing education in B.1.b, we believe that 8 hrs. is excessive if it is to be applied for each scope. If it applies to all scopes combined, it is more reasonable. It seems that you might be recommending 8 hrs./yr. per scope. However, your intent is not clear as it is written. We encourage a clarification of whether it is per scope or for all scopes combined. If it is intended to be per scope, we suggest 5 hrs. as an alternative.
3. We disagree with the recommendation that in-house training by the certifier should not count as continuing education. We agree that in-house training on use of certifier forms, invoicing protocol, etc. should not count towards the requirement. However, in our experience, many certifiers do provide good quality training for their inspectors.

Section C:

1. This section only refers to the actions needed from certifiers to monitor and ensure competent inspectors. It does not go the step farther to requesting that ACAs only work with inspectors holding inspector accreditation or licensing involving a third party. IOIA believes this is an

important lack in the recommendation. Third party accreditation/licensing could involve the endorsement of an existing program (i.e. IOIA Inspector Accreditation), a governmental licensing program, or the adoption of a similar process from outside the organic sector (i.e. ISO standard for organic inspections). Accreditation or licensing could involve comprehensive tests, sort of a 'bar exam' for organic inspectors. IOIA is not advocating for any specific method, but we believe strongly that leaving the decision about inspector competency entirely in the hands of the certifiers who are using those inspectors cannot ensure consistency. The issue of inspector accreditation was addressed in the discussion in some detail, but not the wording of the actual recommendation. From the discussion on page 3, you have stated "We believe that having a pool of inspectors which are formally approved by IOIA under the auspices of the NOP would be extremely beneficial to the entire organic community." As long as each certifier is responsible entirely for 'accrediting' their inspectors, the playing field will not be level. Comprehensive testing, possibly administered by a third party institution, a testing center, an institution of higher learning, or a government body could be part of the process. Currently the maintenance of approved inspector lists by certifiers is the most common default 'inspector accreditation' process. IOIA offers the only 3rd party inspector accreditation program. It is currently a voluntary program, available only to IOIA members, and it is not widely recognized or valued by certifiers. The program is sound, addressing training, education, related experience, a minimum number of inspections, and commitment to organics. Certifier evaluations are required from all certifiers for which the inspector has worked. Renewal is every 3 years, and the Accreditation Review Panel includes inspectors, a certifier, and a consumer representative.

2. What is needed is a new system, a continuum, where prerequisite skills are required for acceptance into basic inspector training, apprenticeship follows, then intermediate level training, then accreditation or licensing. Accreditation/licensing could be appropriate before or after intermediate training, if intermediate training is defined as those skills needed for all inspectors in that scope. IOIA's Training Institute was born out of the need for this continuum. It begins with entry-level, in-person, basic crop, livestock, and processing inspection training that is widely available. The next level, intermediate training, is available primarily through webinars which are reproducible, consistent, affordable, and green. The topics for these courses have been identified by IOIA with the assistance of certifiers as those topics where all working inspectors would benefit from additional learning (i.e. Natural Resource Assessment, Audit Trail/Audit Balance, Input Materials; Livestock Feed Audits; Inspecting Multi-ingredient Processes). Following these courses, inspectors could become accredited. Continuing education and a minimum number of inspections would be needed to maintain that accreditation. Continuing education can include third party training (i.e. IOIA and others) or in-house certifier training in both in-person and web-based format. We encourage you to recognize the value of a third party in inspector accreditation or licensing.
3. We support the requirement for annual attendance by ACAs at NOP trainings but not in-person. These could be available also in webinar format, which negates any argument of prohibitive cost.

4. We strongly support all of the recommendations in C.4, particularly the specific numeric requirements for witness audits. Similar to our comments on mentors of apprentices in shadow inspections, it should be very clear what ‘senior inspectors or senior reviewers’ mean. In our experience, certifiers generally select the inspectors to be viewed during the ARC audits of accredited certifiers. This is akin to asking the inspected party to pre-select the documents and audit trails that they want to track. We encourage you to add the following language to C.4.:

5. Provide the ARC auditor with a list of certified operations and assigned inspections, with the auditor selecting the witness inspection based on random selection or to address specific issues.

In summary, on behalf of our members, we support this document, and thank you for considering our comments and suggestions to put more teeth into it. We need an industry-wide standard for inspector qualifications. Thank you again for the opportunity to comment and for your work toward that end.

Sincerely,

A handwritten signature in black ink that reads "Margaret Scoles". The signature is written in a cursive, flowing style.

Margaret Scoles
Executive Director
International Organic Inspectors Association