



April 4, 2018

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National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave., SW.,
Room 2642-S., Mail Stop 0268
Washington, DC 20250-0268

Submitted via www.regulations.gov

RE: Document #AMS-NOP-17-0057

**NOSB Compliance, Accreditation and Certification Subcommittee (CACS)
Proposal: Inspector Qualifications and Training**

Dear NOSB Members:

Thank you for the opportunity to provide comments on inspector qualifications and training. MOSA certifies approximately 2000 organic operations throughout the United States. We contract with 50 independent inspectors and employ 15 staff members that conduct organic inspections. Well-educated, knowledgeable and experienced inspectors are integral to the organic industry and vital to maintaining the integrity of the USDA Organic Seal.

We support the direction of this proposal. Setting a baseline for inspector qualifications in the organic industry is an important goal and will increase consistency among certification agencies.

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?

MOSA participated in developing the ACA Best Practices document for Inspection Qualifications. The ACA Best Practices document is a well-thought-out guidance for certification agencies and could be used as the primary tool for implementing a guidance from the National Organic Program.

What other resources are available to train new and seasoned inspectors?

In the summer of 2017, MOSA instituted a field training program that bridges the gap between basic training offered by the International Organic Inspectors Association and the ability of novice inspectors to conduct independent inspections. These field trainings were for all inspection scopes, including Crops, Livestock and Handling. They consisted of one day in our office for group discussion and training, one day of apprenticeship inspections, and one day for novice inspectors conducting an inspection on their own while an experience inspector

shadowed. MOSA's field training program successfully prepared novice inspectors for their first season of inspections. Additionally, seasoned inspectors added new scopes to their repertoire.

In addition to MOSA's field training, additional inspection training resources we use include Midwest Organic and Sustainable Education Service (MOSES), NRCS, Valley Stewardship Network, Organic Valley Field Days, and E-Organic webinars.

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?

A licensing system for inspectors may be useful for the organic industry. Once a baseline of qualifications and training was implemented by the National Organic Program, MOSA could administer the licensing system, ensuring uniformity and consistency in the experience, knowledge, skills and continuous education of our inspector pool.

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)?

In addition to inspector qualifications and training, developing reasonable guidance for other certification staff is something that could be explored by the CACS. Baseline education and training for certification staff may provide additional consumer confidence in the certification program. However, hiring qualified staff and providing them with robust training and mentoring is something that MOSA already takes very seriously, and there may be other, more pressing issues for CACS to consider at this time.

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

At this time, we do not have sufficient understanding of other models to make recommendations.

In closing, we appreciate the work of the committee to develop a clear baseline for inspector qualifications and training. We look forward to further discussion on this important topic.

Respectfully submitted,

The MOSA Inspection Team