



March 30, 2017

Ms. Michelle Arsenault, Advisory Committee Specialist
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: Docket: [AMS-NOP-16-0100](#) NOP-16-11

NOSB Certification and Accreditation Subcommittee Proposal: Personnel Performance Evaluations of Inspectors (December 13th, 2016)

Dear NOSB members:

Thank you for the opportunity to provide comments on the proposal on personnel performance evaluations of inspectors. MOSA certifies approximately 2000 organic operations throughout the United States. Currently, MOSA utilizes 45 independent inspectors and 15 staff members that conduct inspections. Over the past three years, we have actively engaged with the NOSB and NOP representatives during the process of developing performance evaluation standards for inspectors. We appreciate the continued work of the NOSB on this topic.

In summary, we support the proposed changes to NOP 2027. MOSA wholeheartedly supports a continuous improvement system that *includes* onsite evaluations as a tool for training and upholding performance criteria of inspectors with the goal of protecting the integrity of the USDA Organic Seal. The requirement that each inspector be peer evaluated annually is unnecessarily prescriptive, would increase the cost of inspections for certified operators, and would limit our ability to support the growth of the organic industry as well as the much needed growth of the inspector pool. We are pleased the NOP heard the comments from MOSA and other certifiers, and the recommendations of the NOSB, and is willing to approve a risk-based approach to peer evaluations. The proposed changes to NOP 2027 will allow MOSA to continue to verify that inspectors have sufficient training, knowledge and skills to verify compliance with the National Organic Standards while reducing the logistical resources necessary to conduct annual field evaluations.

Given that onsite evaluations are a value we share with the NOP and NOSB, MOSA appreciates the direction of this proposal and the willingness of the NOP to accept alternative peer evaluation systems. We would like onsite evaluations to better focus on and support inspector development as a tool to maintain a pool of qualified inspectors, especially in underserved areas.

The system which we have asked the NOP to approve would meet the five proposals set out in the CACS committee recommendation.

We appreciate that the NOSB Certification, Accreditation and Compliance Subcommittee has asked for comments on this issue, and we thank you for your request to the NOP that it be added to your workplan. We are available to answer any questions you may have.

Respectfully submitted,

The MOSA Inspection Team