



# BEYOND PESTICIDES

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March 23, 2018

Ms. Michelle Arsenault  
National Organic Standards Board  
USDA-AMS-NOP  
1400 Independence Ave. SW.,  
Room 2648-S, Mail Stop 0268  
Washington, DC 20250-0268

## Re. CACS: Inspector Qualifications

These comments to the National Organic Standards Board (NOSB) on its Spring 2018 agenda are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers, and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

Qualified inspectors are important to ensuring organic integrity. We agree with the CACS statement, “With well-publicized incidents of proven fraudulent imports in the last year, and recognition such fraud impacts all players in the trade, the need for qualified inspectors experienced in a broad range of operations diverse in scope and scale has never been greater.”

We agree with the CACS that inspector qualifications include knowledge and skills that can be acquired through both training and experience. We agree that ongoing evaluation is needed. However, we disagree with the CACS recommendation that NOP should develop guidelines.

NOP has encouraged or permitted the certification of practices that are incompatible with organic principles –including hydroponic production, dairy facilities with inadequate (if any) access to pasture, and poultry operations without outdoor access. USDA has withdrawn the Organic Livestock and Poultry Practices rule. With such a record, the department should not be given the responsibility for developing the guidance for inspectors who will be the judge of whether operations are meeting organic standards.

Instead, the NOSB should develop guidelines for ensuring that inspectors have adequate training and experience. These guidelines should include guidance for determining when production is *in the soil, in the ground*, when dairy has adequate pasture, and when poultry has adequate outdoor access. The NOSB should develop this guidance through its transparent

processes that include public participation –thus promoting public discussion and consensus within the organic community.

The guidelines should ensure that inspection is not solely examination of paperwork, but also scrutinizes actual on-the-ground operations. We support peer review as a means of continuing training and regular, though not yearly, witness audits by trained inspectors as an evaluation technique.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is fluid and cursive, with a long horizontal stroke at the end.

Terry Shistar, Ph.D.  
Board of Directors