



# BEYOND PESTICIDES

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October 12, 2016

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: Discussion document: Personnel performance evaluations of inspectors (NOP 2027)**

These comments to the National Organic Standards Board (NOSB) on its Fall 2016 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.

It is important to have consistent, thorough inspections that ensure that the requirements of OFPA are met, while not placing undue burden on certifiers or producers when considering changes to the rules. As the CACS discussion document states, the increasing demand for certification of operations necessitate that evaluation programs are “sustainable over time without loss of inspectors or increased fees to clients,” and it is unclear if the programs in place now are doing this.

We agree with other stakeholders who maintain that all organic inspectors must be professionally evaluated every year. We believe that performance evaluations of inspectors are necessary to maintain public trust in the organic label and ensure that inspections are accurate, but disagree with the current requirement for on-site, or field inspections for “every inspector, every year” portion of the rule, as seen below.

**205.501 General requirements for accreditation. (a) A private or governmental entity accredited as a certifying agent under this subpart must: ... (6) Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services.**

Instead, we recommend an updated model for on-site evaluations that prioritizes evaluating novice inspectors or inspectors who require the need for additional evaluations based on past-reviews. For certifiers who do not fall into either of these categories, allowing for an evaluation cycle timeframe of three years would remove the burdens that have been identified by certifying bodies such as the Ohio Ecological Food and Farming Association (OEFFA), the Midwest Organic Services Association (MOSA), and others. We believe this updated model will achieve the goal of conducting consistent, thorough inspections, while maintaining a less burdensome approach logistically and financially to on-site evaluations.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Carla Curle".

Carla Curle  
Science Program Associate