

**Formal Recommendation**  
**From: National Organic Standards Board (NOSB)**  
**To: the National Organic Program (NOP)**

**Date:** May 29, 2018

**Subject:** Inspector Qualifications and Training

**NOSB Chair:** Tom Chapman

**The NOSB hereby recommends to the NOP the following:**

Guidance or Instruction

**Statement of the Recommendation:**

The NOSB recommends the National Organic Program develop minimum qualifications and training, and continuing education guidelines to ensure a professional and competent inspector pool to meet the demands of ever-evolving and complex organic supply chains. These should include considerations of the criteria outlined in the discussion area of the proposal document. The NOSB encourages the program to use existing resources in this area.

The NOSB and organic stakeholders expressed keen interest in remaining a part of the discussion and process as the NOP develops any guidance or instruction addressing inspector qualifications and training.

**Rationale Supporting Recommendation (including consistency with OFPA and Organic Regulations):**

The Organic Foods Production Act §6514(b)(2) states that to be accredited as a certifying agent, the certifier will have sufficient expertise in organic farming and handling techniques as determined by the Secretary.

USDA organic regulations 7 CFR 205.501(a) General requirements for accreditation state that certifying agents and their inspection and certification personnel must have sufficient expertise in organic production and handling techniques to fully comply with and implement the USDA organic regulations.

**NOSB Vote:**

**Motion to approve the proposal:**

Motion by: Harriet Behar

Seconded by: Ashley Swaffar

Yes: 12 No: 0 Abstain: 0 Absent: 1 Recuse: 0

Motion Passed

**National Organic Standards Board**  
**Compliance, Accreditation and Certification Subcommittee Proposal**  
**Inspector Qualifications and Training**  
**February 26, 2018**

## **I. INTRODUCTION**

Since passage of federal organic standards over twenty years ago, the organic sector has seen rapid growth to nearly \$50 billion in sales in the U.S. Such growth has driven expansion in organic production around the globe, and in turn, the growth of increasingly complex organic supply chains. 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.

Inspectors play an essential role in organic certification, often serving as the sole public face of a certification agency (certifier) to the certified operation. Inspectors are the eyes and ears of the certifier, responsible for verifying and documenting organic control points. They play a crucial role in protecting the integrity of the organic supply chain.

USDA organic regulations require that certification staff, including inspectors, have sufficient expertise in organic production and handling techniques (7CFR 205.501(a)). This proposal seeks to highlight the criteria for qualifications and training necessary to be an effective and competent inspector. The Subcommittee acknowledges this discussion can just as easily relate to certification reviewers—and certifiers at large—as it does to inspectors. The criteria outlined below should be considered essential for all individuals and certifiers; however, for the purpose of this document we are focused on the inspector.

The Subcommittee recognizes the extensive body of work that has already been created in an effort to build the foundation for a skilled pool of organic inspectors. We do not intend for this to substitute for that work but to further build on this foundation, with particular focus on complex organic supply chains.

Many resources regarding inspector training and qualification exist and there are general agreements among certifiers on the minimum qualifications they outline. Nevertheless, USDA organic regulations do not include mandatory requirements for inspector qualifications or training. The Subcommittee proposes that the establishment of mandatory qualifications, ideal levels of experience or background, and compulsory continuing education tied to the scope and scale of operations to which inspectors would be assigned, would strengthen the certification system.

## **II. BACKGROUND**

The initial and continuing training of inspectors and the establishment of minimum and ideal qualifications is not a new topic. Since 1991, the International Organic Inspectors Association (IOIA) has promoted and provided inspector training to provide a basis for consistency and integrity in certification. Certifiers and independent training organizations provide training for staff and contract inspectors, addressing changes and updates to the regulations to provide a basis for consistency and integrity in certification. Certifiers provide specific training to ensure that the contract inspectors they work with are familiar with the forms, procedures, and processes of their agencies. Training resources include the International Organic Inspectors Association (IOIA), the American National Standards Institute (ANSI), the International Organization for Standardization (ISO), the Accredited Certifiers Association (ACA), state agency-sponsored investigative trainings, and others.

Inspectors may be independent contractors working for one or more certifiers, or they may be directly employed by a certifier. Most certifiers have policies stating minimum qualifications for contracted and staff inspectors and may be responsible for the initial training of an inspector. However, independent contractors are responsible for establishing their own knowledge base, maintaining their knowledge, and keeping their expertise current through continuing education. Such diverse backgrounds and training schemes make for an inconsistent baseline of knowledge and practice, exposing the certification system to potential weaknesses.

In an April 2012 memo to certifiers, the NOP recognized the vital role inspectors play in ensuring organic integrity. The memo reminded certifiers of the importance of a rigorous hiring and selection process when considering inspection personnel. The NOP noted plans to release draft guidance covering the qualifications necessary for inspectors and reviewers, however, guidance was not published.

In 2011, NOP entered into a contract with IOIA to further describe baseline qualifications and continuing education of inspectors. In using this work, in early 2018 the ACA developed a best practices document for organic inspector qualifications. Both have provided valuable insight into the development of this proposal.

### **III. RELEVANT AREAS OF THE RULE AND RELATED DOCUMENTS**

#### **[205.501\(a\) General requirements for accreditation.](#)**

(a) A private or governmental entity accredited as a certifying agent under this subpart must:

- (1) Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part;
- (4) Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part;
- (5) Ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.
- (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;

**[NOP Memo to Accredited Certifying Agents: Criteria and Qualifications for Organic Inspectors, April 2012](#)**

**[NOP 2027, Instruction: Personnel Performance Evaluations, March 2017](#)**

**[CACs Proposal: Personnel Performance Evaluations of Inspectors, April 2017](#)**

**[Accredited Certifiers Association Guidance on Organic Inspector Qualifications, February 2018](#)**

## **IOIA Criteria for Inspectors and Reviewers working for NOP Accredited Certifying Agencies, November 2011 (See Appendix 1)**

### **IV. DISCUSSION**

Inspector qualifications can be broken down into several distinct areas:

#### **1. Knowledge**

Inspector knowledge includes proficiency in inspection & auditing techniques; strong understanding and knowledge of the USDA organic regulations; understanding of organic certification and inspection processes; and familiarity with the documents and procedures of the certifier whom they represent. It is essential this knowledge base be in the scope and scale of production in which the inspector is working.

#### **2. Skills**

Essential skills include keen observation; clear communication in spoken and written form as well as an ability to articulate regulations and requests for information; a high level of organization; and strong investigative skills. As much as an inspector must be able to communicate and observe, they must also know how to read a situation and interviewee, to listen and to allow an operator the space to convey answers to questions and the knowledge they hold of their operation.

Other skills and abilities vital to the inspector's role are a code of honest and ethical work practice; diplomacy; impartiality; and an overall professional approach to their work.

#### **3. Experience**

An inspector must have experience inspecting the specific scope of operations to which they are assigned. For example, while an inspector may have experience with and deep knowledge of poultry operations, they may have little experience in other production under the livestock scope such as dairy, beef, or goats, production systems with unique aspects.

Similarly, an inspector may have experience evaluating small flocks of birds or several cows on a diversified farm. But they may not have had the experience of evaluating large-scale production systems with multiple barns or larger herds. Thus, they should not be assigned or accept work evaluating these operations until they have gained the capability and training to do so. Mentorships, though often challenging for independent inspectors to arrange, can provide a pathway for gaining experience.

Such experience also applies to handling operations. An inspector may have experience verifying small production lines, value-added on-farm processing, or basic multi-ingredient products. However, applicable skills and experience are necessary for tracing back complex supply chains across multiple handlers and geographical trade boundaries and navigating the varying standards and protocols these supply chains entail.

#### **4. Training (Initial and Continuing)**

Training can come in a variety of ways and often ties directly to experience gained working in other roles in the organic sector. Though valuable, related experience does not supplant the need for intensive, inspection-specific training. Additionally, training does not end once initial proficiencies are reached and deemed sufficient. As in any profession, investment in continuing education is crucial to keeping current with evolving regulations, technologies, and trade.

Prior to taking the lead on inspections, an inspector must know the scope of operation; be educated in the tenets of auditing; be deeply familiar with the relevant regulations; and have familiarity with the certifier's procedures and forms. Only when these minimum qualifications have been met should an inspector begin in-field training and evaluation.

As noted above, a variety of resources exist to provide initial training in organic inspection, and the Subcommittee encourages referencing these for greater detail in establishing minimum baselines. Additionally, certifiers provide training of their own, often coupling in-house training with independent training, and then following with shadowed or mentored inspections with seasoned staff. However, as noted above, there is a lack of mentorship opportunities for the independent inspector seeking to gain direct experience in the field.

Continuing education can take the form of advanced in-person training or webinars to increase competency in areas such as complex trace back and mass balance audits, and updates to regulations that require additional evaluation methods. No matter the method, continuing education must be a part of maintaining and improving professional competence in the field.

## **5. Evaluation**

Evaluation is essential to both the beginning inspector and the inspector with many seasons and varieties of operations under their belt. For the beginning inspector, evaluation should be incorporated in initial training so that productive feedback may be offered, positive practices reinforced, and areas for improvement identified. Especially helpful is coordinating inspections with seasoned inspectors with experience in the scope and scale inspected so that a new inspector may shadow, partner, and then lead on inspections while training. This provides opportunity for feedback and support as the inspector becomes comfortable and competent in their role.

An earlier proposal, Personnel Performance Evaluations of Inspectors, was discussed at the Spring 2017 NOSB meeting and addressed criteria for the field evaluation of existing inspectors.

## **V. RECOMMENDATIONS**

The Subcommittee recommends the National Organic Program develop minimum qualifications and training, and continuing education guidelines to ensure a professional and competent inspector pool to meet the demands of ever-evolving and complex organic supply chains. These should include considerations of the criteria included above in the Discussion area of the document. The Subcommittee encourages the program to use existing resources in this area.

## **VI. REQUEST FOR PUBLIC COMMENT**

The NOSB is requesting public comment from the community on the following questions:

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

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

**Subcommittee vote**

Motion to approve the proposal on inspector qualifications

Motion by: Harriet Behar

Seconded by: Ashley Swaffar

Yes: 7 No: 0 Abstain: 0 Recuse: 0 Absent: 0

**Approved by Scott Rice, CACS Chair, to transmit to NOSB February 26, 2018**