

# Accredited Certifiers Association, Inc.

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September 4, 2012

Miles McEvoy, Deputy Administrator  
National Organic Program, USDA-AMS  
1400 Independence Ave SW  
Room 2646-S, Stop 0268  
Washington, DC 20250-0268

RE: Inspector Qualifications; Unannounced Inspections; and location of the templates

Dear Miles:

The Accredited Certifiers Association (ACA) is very supportive of the work done by the National Organic Standards Board (NOSB) on the issues of Unannounced Inspections and Inspector Qualifications and we encourage the National Organic Program (NOP) to move forward with guidance and/or rulemaking on these important topics.

We believe that the development of baseline requirements for conducting Unannounced Inspections will improve the effectiveness of the monitoring of the certification system, and provide a level playing field among certification agencies and their clients. We fully support implementation of guidance on this issue.

ACA would also encourage the National Organic Program to move forward with the development of guidance pertaining to the Inspector Qualifications based upon the National Organic Standards Board recommendation of December 2011. We believe that clearly stated guidelines for inspector qualifications and continued training requirements will provide guidance for certifiers during the hiring of inspectors and will improve the efficacy of the certification system.

The ACA did provide comments to the NOSB regarding what we believed to be an error in the Inspector Qualification recommendation in Section B.1.a, that states:

annual training by "Accredited Certifiers Association" to update on specific procedures of the ACA as well as National Organic Program (NOP) standards updates and guidelines.

We believe that this statement should not refer to the Accredited Certifiers Association as we do not generally provide training to inspectors. We believe this refers to the annual training

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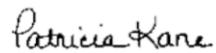
*Accredited certifying agents working together to ensure the integrity of  
organic certification in the United States*

that acas provide to their staff and contract inspectors. The above section was not corrected in the Final Recommendation that is currently posted.

One final topic is a request from our membership that the NOP post all templates (certificates, all noncompliance letters, etc.) in one location on NOP website. We are suggesting these be included as an appendix in the Program Handbook. The usefulness of the templates would be improved if they could be easily located in one section of the Handbook.

Thank you for your efforts to date on these issues and for your consideration of our comments. If there are areas where the ACA can be of assistance in this process, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Patricia Kane".

Patricia Kane  
Coordinator