



**Accredited Certifiers Association**  
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April 5, 2021

Ms. Michelle Arsenault, Advisory Committee Specialist  
National Organic Standard Board  
USDA-AMS-NOP 1400 Independence Ave. SW.,  
Room 2642-S, Mail Stop 0268  
Washington, DC 20250-0268  
Re: Docket Number: AMS-NOP-20-0089

Compliance, Accreditation, & Certification Subcommittee (CACS): Human Capital Management:  
Strategy for Recruitment and Talent Management Organic Inspectors and Reviewers Proposal

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) Compliance, Accreditation, & Certification Subcommittee (CACS) on the most recent proposal on Human Capital Management. The Accredited Certifiers Association (ACA) is a 501(c)(3) nonprofit educational organization created to benefit the organic certifier community and the organic industry. The ACA strives to ensure consistent implementation of the USDA Organic Regulations through collaboration and education of accredited certification agencies. We are committed to upholding organic integrity and maintaining stakeholder trust to facilitate the growth of the organic industry. Our organization is made up of 63 USDA NOP accredited certifying agencies worldwide, which includes all 47 accredited certifiers headquartered in the United States. We are the frontline decision-makers for the effective implementation of the National Organic Program.

We appreciate the Compliance, Accreditation, & Certification Subcommittee's work on the proposal for human capital management. The proposal does a great job researching the reasons for the inspector shortage. In our comments, we seek to answer the questions provided in the proposal.



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1. *What have you experienced or witnessed that contributes to the shortage of organic inspectors/reviewers?*

The ACA concurs with many of the issues in this proposal in regards to retaining inspectors: pay, travel, and lack of professionalization. The proposal does an excellent job outlining the barriers for inspectors to get started and the reasons inspectors leave. However, this issue is deeper than paying inspectors more for their work and will not solely address the issues with the inspector shortage. The organic certification process has become increasingly more complicated and globalized. The industry represents a large diversity of operations from small farms to large processors. Thus, there is a greater need for more qualified inspectors and ongoing training. In order for certifiers to pay inspectors higher fees based on these qualifications, certifiers need to increase the cost they charge their clients to obtain certification. Many small farms lack financial support to obtain certification as is. This issue is only exacerbated by the recent reduction in the organic cost share. The industry needs to value small farm operations and protect their ability to obtain certification. Organic food is important to the American people and in order to protect the industry from fraud, it should be supported by taxpayers; just as taxpayer funding is available for food safety programs. For instance, some public certifiers, such as state and county government programs, are often running at a deficit and are often subsidized. However, private certifiers cannot afford to run at deficits and must increase their fees. Additional financial support is needed to make the cost of certification feasible for farmers in the supply chain and grow the industry as a whole. As complexity increases and the industry grows the cost to offer certification will also increase.

Pay for inspectors is essential to retain inspectors. Not having well-qualified and well-trained inspectors contributes to the shortage of inspectors. However, certifiers cannot be solely responsible for keeping the inspector pool knowledgeable and well-trained. The whole industry has to come together to work on this issue. Well-qualified inspectors and certification review staff often leave for better paid positions such as with the NOP, food safety programs, staff positions at other certifiers, and the private sector.

Another issue to address is the competitiveness among certifiers to secure inspectors. The cost differential between certifiers creates competitiveness among certifiers and inspectors because there are no standardized fees. There are benefits to that, but also concerns. Are larger certifiers outcompeting smaller certifiers for inspectors? Are inspectors reducing their fees to secure work with certifiers? Unfortunately, we are unable to answer these important questions as we do not know what certifiers pay their inspectors. The ACA has talked about polling certifiers to gather this information.

Because there is no uniformity among inspector pay, certifiers do not know where on the spectrum they fall for inspector pay. Some certifiers have their own fee schedules and others accept inspector fee schedules. Some certifiers charge add-on fees for certification that can help pay inspectors such as for extra sites, adverse actions, and additional fees that relate to the inspection. Knowing how much certifiers pay inspectors is important to know so there can be advocacy for inspectors and certifiers can adjust their fees appropriately.

Another issue that was addressed in this proposal was inspector burnout. However, this can also occur with review work. The work is much harder for certifier staff today than it has been in the past. Also, there isn't always upward mobility or ability to pay staff more.

2. *What are some additional strategies that can be employed to increase the numbers of organic inspectors and reviewers?*

The industry should consider organic inspection and certification review a professional career path. The issue in the way inspectors are treated in the industry is largely due to the fact it is not a professionalized career path. Standardization in education is needed. This may involve a certification or accreditation program for inspectors.

Furthermore, the pandemic has shone a light on what can be done differently to improve work conditions for inspectors, specifically requiring less travel. Many tools can be utilized now, including virtual inspections to improve reporting and resolve some of the issues related to flexible work-life balance for inspectors. Additionally, training can be offered online at reduced costs for inspectors.

The ACA welcomes opportunities to be involved in future working groups to develop collaborative strategies to increase the trained inspector pool. It is important for the NOP to be involved in these groups as well. The ACA can also work on educating certifiers and collaborating with other industry groups on creating greater awareness of the value of experienced inspectors and reviewers.

3. *Are there appropriate ways for the National Organic Program to assist with the financial burdens of?:*  
a. *Initial cost of becoming a trained organic inspector.*

Yes. As it is now, inspectors and/or certifiers are responsible for paying for their education and training. Opportunities from the USDA or NOP to provide scholarships/funding for inspector education would be greatly beneficial.



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Although training to onboard new inspectors is a barrier, retaining inspectors is a bigger issue.

*b. Costs of continuing education for existing experienced inspectors, and*

Yes. Continuing education costs the inspector time and money. It is often the case that when inspectors add up the hours they are spending without compensation, the end resulting salary is very small and discouraging.

*c. Compensation for organizations and/or experienced inspectors to provide qualified one-on-one mentorships to beginning inspector/reviewers.*

Yes. Initial training to become an organic inspector is oftentimes not adequate and mentorship is necessary to create well-qualified inspectors who continue to expand expertise. The barrier is that mentors are not paid to mentor and they also risk losing work to less qualified but cheaper inspectors.

The ACA would like to thank the NOP and NOSB for addressing the issue of human capital and the work that went into developing this proposal. We appreciate being able to offer comments on this important subject. Again, we would like to emphasize that the organic industry needs additional financial support to address these human capital issues. The NOP should be funded in a more appropriate fashion through governmental policy and fiscal allocations. As organic certification becomes more complex and globalized, and more is expected of the certifiers and inspectors, the cost to provide certification will increase. The increase in the cost of certification to farmers will ultimately increase the price of food for consumers. Increasing certification costs while reducing cost share programs can price small farmers out of certification and undermines their value to the industry. The ACA is open to participate in strategic planning to develop solutions.

Sincerely,

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