

# PUBLIC SUBMISSION

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**Docket:** AMS-NOP-13-0051

National Organic Program: Request for an Extension of a Currently Approved Information Collection

**Comment On:** AMS-NOP-13-0051-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: National Organic Program

**Document:** AMS-NOP-13-0051-0029

Scoles, Margaret: International Organic Inspectors Association

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## Submitter Information

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## General Comment

See attached file.

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## Attachments

IOIALet.NOP. Doc. No. AMS-NOP-13-0051; NOP-13-02



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August 27, 2013

Toni Strother  
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Room 2646 So. , Ag Stop 0268  
Washington, DC 20250-0268

Re: Document # AMS-NOP-13-0051; NOP-13-02

Dear Ms. Strother:

The International Organic Inspectors Association (IOIA) appreciates an opportunity to respond to questions regarding time requirements involved in organic certification, including

- (2) the accuracy of the agency's estimates of the burden of the proposed collection of information including the validity of the methodology and assumptions used
- (3) ways to enhance the quality, utility, and clarity of the information and
- (4) ways to minimize the burden of the collection of information on those who are to respond.

We will limit our comments to those issues directly affecting inspectors and inspection.

1. Regarding Question (2), we are surprised that the Supplementary Information provided did not include a time estimate for time on inspection plus time spent preparing inspection reports. We understand that both vary widely depending on the size and complexity of the operation. However, the time spent on inspection and inspection reporting remains one of the most critical of the information gathering activities and the most costly to certifiers and operators in both time and money.

While it is not possible to estimate or average the number of hours per inspection in time required, we can say that generally inspectors spend the same amount of time preparing for the inspection as well as following up afterwards as they spend on the on-site inspection. If certifiers require extensive inspection reports, the time spent on reporting will generally exceed the amount of time on inspection. Independent contractor inspectors often say that they feel they cannot and do not charge for all the hours spent because the cost burden would be too great for the operators.

Addressing time requirements is especially important with the loss of certification cost-share programs, which previously mitigated the burden of inspection and certification costs on the operator.

Most inspection report forms include a reporting requirement for number of hours on-site and many also include a reporting requirement for number of hours spent on the report. Independent contractors are usually paid on a per-hour basis and submit invoices by the hour. Therefore, in many cases, collection of this data would not be difficult and the data would be useful. However, there are certifiers who either have "chapters" or require lowest cost flat-fee bids for services. Thus, they would not know anything about hours spent. Others who have multiple subcontractors provide bids for lowest-costs prior to contracting.



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2. Regarding Question (3) and (4), inspectors work with a wide variety of certification agencies and we see a similarly wide range in inspection reporting requirements between those certifiers. Some of the least efficient are those which require the inspector to report on information available in the Organic System Plan. In some cases, inspectors have reported spending several hours writing a report where there are no issues of concern and there is no further information that is needed. Some of the most efficient and least time-consuming systems are:
  - a. The operator has a comprehensive Organic System Plan (often including OSP Update documents), and the inspector's job is primarily to verify accuracy of the plan. Inspector comments are limited to what findings may be out of compliance, items that could not be verified, items that were not covered by the Organic System Plan, or items that were observed to be inconsistent with the Plan. The inspector's report is limited to comments on these issues or on Organic Control Points. The written report consists largely of an Exit Interview Document.
  - b. A reasonable Checklist with Comments report format can accomplish the same purpose. The inspector does not report every observation where the operator is clearly in compliance, but uses comments when findings show that the operator may be out of compliance, items could not be verified, items were not covered by the Organic System Plan, or items were observed to be inconsistent with the Plan. The written report consists largely of an Exit Interview Document.
3. A general comment is that while a great deal of emphasis is put on training and qualifications of inspectors, there is a need for similar emphasis on training and qualifications of the reviewers who are the final decision-makers. IOIA is dedicated to quality inspections, quality inspectors, and quality inspector training. There is no similar organization or structure dedicated to the qualifications of organic reviewers. While many certifiers do a good job of training their reviewers and many reviewers do complete organic inspector training, there is wide disparity among and within reviewers and how certifiers manage them. Organic inspectors do not make decisions, so there is an inherent need to provide a great deal of information to the final reviewer in the report. However, inspectors often find themselves spending inordinate amounts of time responding to requests resulting from redundancy in preliminary reviews or lack of understanding in the final reviewers. Organic certification involves four parties – the operator who writes the Organic System Plan, the initial reviewer, the inspector, and the final reviewer. Significant time is often spent by the operator and the inspector generating highly detailed written documents which are submitted to less qualified reviewers. We feel that more attention paid to qualifications of reviewers would enhance the quality, utility, and clarity of the information collected in organic certification.

Thank you for the opportunity to comment.

Sincerely,

*Margaret Scoles*

Margaret Scoles  
Executive Director