



BEYOND PESTICIDES

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March 22, 2021

Ms. Michelle Arsenault
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW.,
Room 2648-S, Mail Stop 0268
Washington, DC 20250-0268

Docket ID # AMS-NOP-20-0089

Re. CACS: Organic Inspectors Recruitment and Training

These comments to the National Organic Standards Board (NOSB) on its Spring 2021 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.

In general, we support the comments of the National Organic Coalition on this discussion document. However, we would like to point out a disconnect between challenges reported by inspectors and the strategies suggested by the subcommittee.

In particular, many of the challenges reported by inspectors concerned compensation—monetary and otherwise—for the job. Other challenges had to do with job expectations.

Concerning compensation, it appears that the bidding process by which certifiers hire inspectors results in inspectors undervaluing their services and in reducing incentives for improvement. We suggest that a system that standardizes the cost to certifiers while establishing a pay scale for inspectors might help to rectify these problems. The pay scale could be based on a standard base fee and rate of reimbursement for expenses, with possible additions for:

- Experience,
- Training, and
- Mentorship.

In addition, some effort should be made to standardize expectations. Those expectations go both ways. Certifiers should have a standard expectation for inspections. Inspectors should also have expectations about actions that might be taken on the basis of their inspections.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Shistar". The signature is written in a cursive style with a prominent flourish at the end.

Terry Shistar, Ph.D.
Board of Directors