

Ideas and Issues from Workshop 1

- NOSB should go beyond material review and push standards forward on the idea of continuous improvement.
- NOP should respect and use the work of the NOSB(NOP hasn't made use of NOSB work on developing new standards or interpreting standards)
- NOP lacks transparency, accountability and has poor communication.
- Need a clear governance structure in organic sector with checks and balances
- Extend the role and responsibilities of the NOSB
- Don't cut back on the NOSB, provide more support to it such as technical research support in support for writing up opinions
- At NOSB create a consent agenda format for those materials or areas where there is 100% support
- Between NOSB and NOP need improved transparency and explanations for why things are happening in the way they are.
- Have more stability in priorities of NOSB
- Clarify the role of the NOSB and expand it.
- NOSB should have the autonomy to set their own agendas within the authority they're given.
- More transparency in NOSB membership and appointment
- NOP needs to be reminded to take advice and standards interpretations of NOSB seriously and enforce them.
- Reevaluate the makeup of the NOSB board: A dedicated inspector and more certifiers could be useful-balance the board.
- Remove barriers to participation in the NOSB from the existing stakeholder group
- Need more communication from NOP on why a NOSB recommendation wasn't worked on or a material wasn't sunsetted
- Encourage the NOP to be more transparent and communicative
- Create a more detailed summary to show accountability of where the NOSB agendas on hold stand
- NOP should be publicly transparent about what recommendations/sunsets are carried forward, why, what the timeline is, and what obstacles exist (if any). All organic stakeholders have a right to know the results of their efforts and what changes to expect.
- NOP should work on standards - inconsistencies across certifiers -- greenhouse/mushroom. This would solve a lot of issues in implementation. Personal, petfood, fiber.
- Enforce the rules that are already on the book.
- NOP should utilize opportunities within the handbook and guidance documents to keep pace with innovation and product changes. In so many cases they can make updates to existing ones or make new ones. Swifter handbook decisions must be rooted in NOSB recommendations.
- NOP should change something in the framework to get guidance through
- Create an environment of accountability for the NOP - a functional peer-review process, and an Ombudsperson. Something to hold them accountable to the rules as written and not the current people in USDA.
- Need an ombudsperson or a committee so that certifiers can disagree with the rulings of the NOP and interpretation of the regulations.
- Have a system for complaints against the NOP without retaliation.
- Establish a procedure around investigating complaints against NOP rulings to that the certifiers have a role and voice in the process
- Ensure the dialog presented by ACA is representative of the many different stakeholders and considers minority perspectives

- When the ACA can't reach an agreement for consistent implementation of a standard the NOP should see that as a priority area
- There is an inherent conflict of interest in certifiers being paid by the people they regulate. Need cost-sharing between the NOP and certifiers who are under resourced
- The public-private division uniquely positions the organic sector to avoid conflict of interest in standards development and shouldn't be moved closer to the private sector side or the government side
- Frustration with things not going through OMB because they are at capacity: we need to strengthen the government bureaucracy in which the NOP is positioned.
- Need a formal process that NOP goes through that will keep them open and in accordance with stakeholder needs
- Original legislations should be a floor not a ceiling. Through public private partnerships go beyond what the law states for continuous improvement
- Continuous improvement means to improve constantly, update compliance and learn more what works or doesn't work.
- Continuous improvement is to maintain and improve natural resources
- We need to define continuous improvement to include in the regulations
- The organic sector changes, need a continuous assessment so continuous improvement is a part of the process
- Difficult to define continuous improvement, need to discern how one can show it and what it will look like to the person auditing it
- Continuous improvement is visible at the grass roots level with soil quality, emissions etc.
- Things are moving in a positive direction on continuous improvement, but it will be a longer time scale and change can't happen overnight
- Continuous improvement means that things must change. This isn't necessarily compatible with bureaucracy or government so regulations should be continuously upgraded
- The slow movement of government is an issue for continuous improvement
- Important to communicate regarding noncompliance, but always try to underline solutions or corrections to problems: not about kicking out of labels, but about correcting problems.
- Need to consider where continuous improvement can land into the regulation.
- Continuous improvement as a principle, being general is good and the principle would need to be adapted to the specific situations.
- Biodiversity is an aspect of continuous improvement that has not been made clearly operationally. This is a part of the statute that has never been flushed out.
- Biodiversity is a soft part of the standard. Working with biodiversity is subjective, what is enough biodiversity?
- Continuous improvement is also subjective
- Continuous improvement should be explicitly added to the standard
- Record of continuous improvement should be kept in ways that are easier for certifiers to access
- Renewal of certification is an opportunity for measuring improvement
- Change negative language in organic to positive language
- Need an overall concept that provides some grounding to continuous improvement
- Excluded methods is an area of continuous improvement
- Soil health provisions in the organic regulation are important to continuous improvement
- It is not clear when continuous improvement should be included, need to provide more guidance

- When reviewing many different types of operations and working with the government it is difficult to define continuous improvement
- Biodiversity, soil health and natural resources are identified areas for Continuous Improvement
- NOP gives no guidance on tools that you have or need to work on continuous improvement
- Continuous improvement never lived up to the original concept and without more specific guidance from NOP certifiers are out on a limb in this area
- The Organic Systems Plan(OSP) becomes stale very quickly, we need to have innovation as we move forward
- OSP addendum for processors expect them to update every year on a year-to-year basis. This is more paperwork, more resources, and more time.
- The OSP needs to address when something is in the plan but the changes never come to fruition
- OSP can be used to strengthen continuous improvement
- Need to reduce the paperwork
- Biodiversity and natural resources certifiers spend a lot of time and documentation, also in crop rotations. We need to put in a formula that is easy to follow up on.
- Need better technology for OSP but also need to ensure equity and accessibility
- Need open lines of communication among certifiers: We want to work together but it is not easy
- Need to have standards for a processor to deal with biodiversity and natural resources (currently this only exists for producers)
- We try to be everything to everyone but it's not necessary/ There are existing standards for social labor standards, and there is no need to reinvent the wheel
- There are things that organic is already doing that we might want to incorporate into the label and consumer education more, such as non-GMO, humane care, and climate-smart. Consumers often don't realize all that organic is—we need to market it better
- There are so many misconceptions about what organic is. We need to be careful about add-ons.
- There are current labels-fair trade-that might already be regulating social and labor standards. We should try and learn from/ incorporate them in some way.
- There are mechanisms for adding these standards into the organic standard by offering them as add-ons to the certification, rather than start out of the gate with it as part of certification, but that could create different levels of certification – gold, silver... Allow operations to opt into it, and eventually it becomes what everyone is striving for.
- Consumers already feel social and labor issues are part of organic standards
- We need more appropriate lending to support organic transition and have a larger time frame of lending (not year to year)
- Mechanism is the most effective way to transition to organic
- It is difficult to pay a premium for a transition label rather than the full organic: consumers may not do this
- Lending is crucial for the organic transition
- There are transition labels in Australia, we could look to them for inspiration
- If a premium for farms in transition, it may be a challenge of completing the transition (already have a premium so may be a disincentive to complete the process)
- Consumer education would need to be centered with a transition label, something that helps a consumer differentiate between transition and organic
- Transitional labels could be more accessible for consumers that cannot afford the full organic premium

- Many operators find it tedious to complete OSP. There are portions they exclude and it becomes hard to schedule an inspection when it is not completed.
- For the OSP It is hard to create a form that covers all types of farms that could be a standard form for every farm.
- The OSP and NOP seem to be developed for a monoculture system. OSP gets complicated quickly when there is diversity in production and applications.
- Certifiers have a hard time developing forms that capture normal farmer practices like unwritten contracts.
- There is farmer resistance to record keeping even when there are handy tools available
- Small farmers without extra staff have a harder time keeping records
- Noncompliance should not turn on isolated problems but should look at the system. A farm's certification should not be dependent on the location of one invoice, which could also implicate the certifier's accreditation.
- Should apply risk assessment to record keeping. Develop a risk assessment tool to use across agencies(internationally there are databases that track risk assessments which are a required component of certification)
- Could have multiple inspections per year instead of annual so farmers can better understand how to be compliant and maintain records
- There would be huge incentive for farmers to be in compliance if they were rewarded with out having to face yearly inspections for consistent compliance
- Requirements should be specific to size and scope of operations
- The USDA should create more standard forms when possible
- Certifiers should have leeway in inspection based on risk assessment. Not every operator needs to be inspected every year, like those who have been in complete compliance for 15 years. That could free up inspector time to dive deeper into higher risk operations that need more oversight. Agencies should be able to determine the frequency of inspections based on the operation's history.
- NOP should adopt ACA best practices on risk assessment and make that a guiding document. If risk assessments were in the regulations, an NOP auditor might spend too much time on it with the inspector during the accreditation process and each certifier would not be able to respond or adapt.
- ISO 1911 says how to approach risk assessments for audits. We can use UN/ISO procedures for risk assessment.
- The NOP should adopt ACA best practices but regardless, certifiers are still using them.
- The NOP often causes more problems when trying to solve material disagreements between certifiers.
- Some black and white areas in the rule should have more flexibility and incorporate risk assessment e.g., virtual inspection, less frequent inspections. Give certifiers more authority to decide how to go about inspections without risking our accreditation.
- Having to evaluate each inspector so often is a significant burden on agencies, especially during the pandemic.
- Certifiers need the ability to adapt to changing circumstances while maintaining integrity.
- There needs to be a greater focus on integrity and not just black letter law.
- Operators just want to produce food, and sometimes there is not knowing or understanding the requirements -- operators have to look for information especially for multiple sites in different countries.
- There needs to be space for conversations with USDA between the certifier and NOP – certifiers want flexibility but don't want to get in trouble by raising issues.
- Certifiers remain neutral and keep out of anything overly political.
- There is no outside pressure that certifiers feel coming at them in regards to politics.
- Small organic operations are often pushed out of the picture in the organic sector.

- Requirements and expense of certification is not as achievable as it could be for small organic operations
- The current standards and regulation pushes smaller growers into grey areas of and forces them to make choices or not be fully compliant
- Create an OTA task force with certifiers and inspectors
- Remote inspection allows more time to do mass balance and trace back
- Carbon footprint has been reduced(no travel miles) with remote inspection
- Remote inspections don't feel as rushed and allow for higher quality of inspections that clients notice and appreciate
- Drones are very useful for inspection, but are difficult to learn and also pose challenges on Amish farms who do not want to permit drones, videos, or even pictures
- Drones - very useful, but difficult to learn, can also be challenging on Amish farms who do not want to permit drones, videos, or even pictures
- For inspections a fillable form directly into (something), that can attach pictures instead of pdf report would be helpful
- Have tablets for each inspector (or phones) with an application use for inspections
- Software is expensive and time consuming to "play with" at inspections
- Need checklists integrated with a common database (for both inspector and reviewer of report)
- Could have an Amazon-style integrated experience for certifiers, clients, reviewers, etc.
- There is going to be variation in an inspector's ability to use electronic tools, while moving away from paper is desired it may be difficult
- Could have grant funds to modernize systems for certifiers
- In-tact is a useful application but very expensive
- Certifiers are 200-300 client range, it took an entire person to set up the In-tact system, any requirement of it would cut out small certifiers from the game
- Inspectors don't need to physically revisit the site every year. Could offset virtual with a physical inspection every 5 years
- Google Earth (pro version) can calculate acres, measure borders, more people should utilize this for inspections
- We do need boots on the ground every year for producers
- Workers and brand owners do not need on-site certification
- Inspectors need to be able to do more unannounced inspections that are desk audits remotely
- Could use a risk assessment of operations as a justification for way a remote versus online inspection is done
- Can modernize the OSP with an online format that lives in a cloud system
- A framework OSP with customizable portions would be more effective
- The OSP may be obsolete--the EU doesn't have one.
- Keeping an inspector and reviewer separate is challenging without an OSP.
- Variation in certifiers can be confusing
- \$200 annually is reasonable for certification
- The handling operations subsidize the farms, that are the cash cows for certifiers
- Certification fees are not out of line
- Better education for farmers transitioning to organic is direly needed
- The current certification model does not fit huge international companies
- Having a standardized certificate would be helpful
- The problem of the current certification model isn't on the small side, it is on the large side with opacity in supply chain linkages
- USDA needs more staff to modernize and streamline the accreditation and audit system
- Everything about the accreditation and audit system seems inefficient

- A universal database would make audits faster
- Need a material review database, there is no universal one and every certifier is wasting time
- ACA does a great job creating best practices, but to ensure organic standards are evaluated and interpreted in a clear way certifiers need more NOP involvement
- NOP gives conflicting answer and proposed guidance that creates controversy like the origin of livestock, treated lumber, or the amount of ingredients in multi-ingredient products
- When needing to get clarity from NOP on gray zone areas have to contact the regional manager and fill forms out to be stuck always waiting without dialogue.
- NOP regional managers have a high turn over which impedes communication
- The pandemic resulted in the permission for certifiers to try new things, it was born out of necessity but has led to innovations
- Virtual inspections resulted in use of Ipads, Tablets, and seamless technology to help the backend run smoother
- Latest tools in inspection include “Eye Succeed” glasses technology, use of Microsoft Teams for audits, Linking into surveillance at a facility
- In using technology more, there is a visible disparity between urban and rural communities in internet access equity and cell phone use
- Tools that could be utilized for inspection include surveillance, using technology for witness audits, and field evaluation of inspectors through remote technology.
- A dream tool for inspection is a uniform question checklist from the USDA with a software application, and questions already defined for everyone.
- Uniform certificates have been a non-started for 20 years: can the USDA or ACA pioneer one?
- There is a desire for autonomy and individualism that creates internal resistance to a checklist even if useful.
- There are varying technological communities and we need to meet everyone’s needs
- It is hard to innovate if we aren’t sure how the NOP will receive it: We need permission to try new things
- There are benefits and downfalls to virtual inspections. For some operations, virtual inspections are more effective. But, inspectors burn out by sitting behind a screen all day.
- Virtual inspections are great for spot inspections, investigations or a complaint.
- The ability to use technology for inspections doesn’t apply across all operations, we need risk assessment.
- Certifiers should use a risk-based approach to do targeted inspections, more of an audit of specific key points, getting to more operations with a risk-based approach to how deep our inspections go
- The OSP could be uniform in scope and tied to a software used for an inspection checklist that allows you to see the OSP, photos, and the checklist.
- The OSP has to be simplified: it is so complex it is no longer function; home in on what really has to be in the OSP.
- For the OSP, increasing detailed stringent reporting is part of the problem. We need a better understanding of what is best as a guideline vs a regulatory requirement.
- The OSP is not obsolete- it is a tool to understand from a desk what is happening on the farm, but it becomes problematic when the NOP micromanages what has to be in an OSP.

- The OSP is a living plan, it is a lot of paperwork to fill this out each year and a big challenge to keep records.
- There is great potential with information and data from the OSP to be a vehicle for change and prove out what organic is doing. If it was all digitized in a way it could be analyzed we could understand things like soil building practices by region. But it is all in individual documents, if we managed it all together somehow it would be a gold mine of data.
- There is a conflict of interest in being funded by those we certify
- Need more cost sharing of certification and the federal government needs to understand the benefit of organic.
- We should collect data on certification fee structures and what is out there to determine what is the true cost of certification
- To help lower cost of certification, group inspections and crossing of resources could be implemented where possible
- Need to simplify the process with increased streamlining and efficiency for certification. The paperwork has gotten to long for inspectors and certifiers, you can't do more than 1-2 sites a day.
- The current certification model doesn't fit group certification, but the Strengthening Organic Enforcement(SOE) final rule will address this
- Understanding how to navigate and evaluate internal control systems is a different certification skill set
- With private label certification, traders, and brokers, the current model of certification has gaps that need to be filled to get everyone on the same page
- More needs to be done in the current certification model to bring everyone on the same page. The system is scaled neutral but the way standards are applied doesn't work the same if applied to all operations the same. It becomes even more complex for diverse operations in line with ecological niches.
- The current accreditation and audit system is ridiculous, it should be reviewed during the assessment.
- Accreditation could be targeted: look at the things that have changed and were weaknesses last time rather than churning through the same things annually
- The current accreditation and audit system is just jumping through hoops. We submit an annual update every year, but then they still request a full application packet. The accreditation audit can be done based on information in the annual report
- If we are CCing the NOP for every action, the NOP should keep track of it and not ask us for it again
- Cost is a challenge and constraint for accreditation. Hourly rates have vastly increased
- The NOP is more worried about whether a certifier is following their procedures than the complexities of whether a certifier is reviewing material appropriately
- There is inconsistency in material review
- The NOP gets caught up in numbers, not how certifiers are actually enforcing compliance with clients
- Need to hold all certifiers to the same standards. The NOP needs to be explicit in how to do things with additional training on what their expectations are

- There is a lack of consistency on how things are communicated to certifiers
- The NOP is very far removed from reality and there are so many nuances in reality that the NOP needs to be more flexible
- Organic standards questions should be evaluated and interpreted with ACA best practices.
- Certifiers are the best ones to evaluate compliance and how to apply standards. NOP is not in the real world, they don't understand the way we do: the nuances and diversity of operations
- Need to get NOP in the real world. If they are going to come out with a policy memo they need to consult with experts(certifiers) first
- Need more transparency from the NOP. Program manuals like guidance documents should be accessible online and updated for all certifiers to see. This should be a participatory process that allows feedback from the field and for issues to be challenged.
- We need something transparent, democratic, with time efficiency and timely clarification to evaluate and interpret organic standards in a clear, consistent way.
- NOSB recommendations need to be take up quickly
- Sharing of information in a mentorship way is needed among certifiers and inspectors. It is difficult to train someone in this industry unless you have all the information.
- Hesitant to interact with NOP to get clarity when there is a gray zone because of poor performance of NOP
- When you submit a request for guidance to the NOP it takes 6 months and by the time NOP responds it is too late
- Everything in organic is context dependent and NOP needs to understand this
- OIAC training course is too cumbersome, we need a document you can search keywords in and share as a resource
- The joy is going out of the system, we are losing the process. How can we keep the joy and the heart in the system?
- The European standard relies heavily on risk assessment, something the NOP doesn't use but that could be a really great tool to eliminate burden and focus time and money on where it should go.
- We need guidance, transparency, clear expectations, communication from the NOP
- Material review takes the most time, is the most challenging, is the most inconsistent, and expensive.
- The NOP or EPA is a better place to do material review
- NOP oversight of certifiers is really inconsistent and results in holding our producers to different standards
- Material review organizations should be accredited and reduced to one or a few organizations.
- There is an environment of uncertainty as to how decisions will be perceived by accreditors.
- A problem with the whole system is that we require organic producers to prove themselves, but don't hold accountable other producers contaminating. It is unfair to punish a small producer using water contaminated by others, EPA should be regulating these things to not have environmental contaminants.

- We should guarantee organic won't have contaminants other than what is unavoidable. We need to break the news that we are all living in a contaminated world and no way to fully break away from it.
- Coordination with other agencies like EPA could be used to proactively identify and review natural substances
- The USDA organic label is still breaking through to consumers.
- Because of the regulated nature of the USDA seal, it keeps on gaining ground that other programs don't
- People understand the USDA organic seal to some extent, somehow in a reductionist sense (no pesticide and no GMOs), while for 3d party certified claims, people are not sure what it means. However it is becoming more consuming for consumers as they hear more about other claims. Antibiotics free, animal welfare claims, these claims confuse consumers
- The organic seal is breaking through in terms of its growth trajectory.
- Other seals are single attributes and more definitive than organic might be.
- Although organic is non gmo we don't always know for sure because it's not always tested, while the non gmo seal will be tested.
- Consumers are still pushing for the organic label, but not at the same rate that it used to be and perhaps new claims are influencing this
- Emphasizing organic in schools, prisons, hospitals and not just to home consumers would help attract new consumers to the organic label
- There was a huge increase in organic sales during the pandemic. Really obvious that people still trust it, but also impacted by people eating out less
- Organic should be the bottom and not the top. Competing seals are trying to do that, and to go on top.
- The NOP is so big that it makes it difficult. We are starting to lose the cutting edge and diversity. If we want to continue to break through, we need to find a way to continue to communicate to new sectors and through the seal
- We could turn the USDA seal into a QR code to modernize it and be helpful for younger generations to give info for consumers to read about the product.
- The organic seal should be updated and modernized but if done in a technological way, it shouldn't leave a lot of people behind.
- We could have a seal that says "this is what organic really means"
- A new seal could make organic meaningful to consumers in their lives, not just about the USDA. Ex: "my organic" for them to get information that they really care about. A place where companies could tell their stories. A seal that reframes the picture.
- Instead of being optional, the USDA seal should be compulsory on organic products.
- We shouldn't talk about what organic isn't, we should talk about what organic is. Organic means soil health and biodiversity.
- So many new claims are already organic. The NOP needs to step up their game, and to say "we already have this stuff": grassfed, regenerative. We need to have organic mean something to consumers again.
- More marketing needs to be made about what organic means and what the seal stands for.

- Educational work needs to be done on organic claims.
- There is more work to be done with the NOP program on efforts that have been pushed through but not there yet.
- It is difficult to verify other claims as a certifier like the organic regenerative certification program.
- Grassfed is an add-on program to organic. For regenerative organic, that could be a goal that organic thrives for.
- Labor requirements are an important thing to add to the organic label
- We can't just keep on piling out the requirements. If you want to broaden the scale, you need to change the structural component. You can't make a mouse into an elephant, you need a different structure.
- For organic to become what it always intended to be, social, environmental, we need to look at more of the outcomes than on the process/details of certification
- The stool of sustainability has 3 legs: environmental, social, economic. If you look at Brazil, they have an eco-social certification that is separate from organic but if you put the two together, you have the 3 legs of the stool.
- Consumers value the organic seal but there are high market concerns in terms of accessibility (affordability) and that is a major problem to address.
- Need better training , an organic integrity learning center, to help certifier to recognize fake labels
- Once, there was a slaughter house that blamed us because we didn't certify their USDA meat label that the USDA has to sign on for. But it is not our responsibility to sign that. We need to make sure that people understand what we approve of as a label, which is very narrow.
- We see claims on labels that we know for a fact are incorrect but we can't do anything about it. So we are running the risk or ruining our reputation as a certifier if that claim is there but we also don't have authority on the claim either. Ex: grassfed claims are regulated by FSIS but everyone can use them. This hurts the organic label ultimately to add that claim on it but organic certifiers cannot do anything about it.
- Legal questions on how to certify the same things still cause issue and interpretation problems after so many years.
- Many clients don't like hydroponics being tied with organic. Members are not happy with it.
- The non-gmo project verified logo, and organic certified cost clients, which people find very upsetting because it is an extra-cost to them even though organic is non-gmo.
- A lot of clients are looking for market differentiation. GMO is included in organic, but grassfed or regenerative is a step up and as a way to stand up in the marketplace.
- Some of the other label programs are easier to get than organic. So for clients, it depends on what their consumers want. These programs have all the same overall goal which is to make the world a better place, and they could all better communicate. Sometimes they are competing for market space, but in terms of cost, labels could be paired because they are overlapping information. The organic market should make alliances instead of thinking of these people as enemies.

- Certifiers should try to lower the burden for producers with marketing labels. We should simplify the process for them. These labels are all able to make them tell their stories and sometimes they choose to get rid of organic and not of another claim because it fits their clients demand better.
- It can be a really big lift to align programs for consumers. It is challenging to do that and provide a good service to clients. To do this it requires more resources for certifiers.
- The market drive is important for the producers. They look at what the final consumers want.
- It is important to create a one-stop shop for clients to get marketing claims.
- Pushing organic outside the food world would work, the textile sector has a lot of potential
- It is super important to say what is behind the organic seal, because the more consumers can get transparency, the more they will be able to buy it and to make an informed claim. Transparency is the organizing principle and certifying is just one tool for that. If the seal and the information behind it could lead to greater transparency, it would really help. Consumer education is a paramount task.
- The organic label could stay the same but include a number ranking next to it. Plus 1, plus 2, etc and then have a QR code on the package or use AMS to have a registry, and look for the code