

A Study of Accredited Certification Organizations under the National Organic Program

Report presented to the Accredited Certifiers Association

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Executive Summary

The following report discusses findings from a study designed to capture the experiences of USDA accredited certification organizations in implementing the National Organic Program (NOP) regulation. The research presented is the result of collaboration among the Accredited Certifiers Association (ACA) and a research team representing Indiana University-Purdue University Indianapolis and the University of Colorado Denver.

Data for this study were collected through formal interviews and an online survey of NOP accredited certification organizations. In the spring of 2013, the research team conducted interviews with 11 such organizations. These interviews helped researchers identify implementation challenges and successes, develop survey questions, and explore relationships between the certifiers and the Accredited Certifiers Association. Following the interviews, an online survey was sent to representatives at 88 accredited certification organizations. Forty three survey responses were received for a response rate of 48.9%.

Project Objectives and Findings

The table below includes the four objectives guiding the study and highlights corresponding findings.

Objective	Findings
<p>To understand the strengths and weaknesses of the NOP, including the alignment of rules and actual practices of organic producers, handlers and certifiers, from the perspective of organic certifiers</p>	<ul style="list-style-type: none"> • All respondents agree the NOP is necessary to maintain consistency in organic food production (strength) • According to results, some feel the NOP does not address the concerns of organic producers (weakness) • 92% believe their organization’s goals either “Completely align” or “Mostly align” with the goals of the NOP (strength) • A small percentage of respondents (16%) helped develop the initial design of the NOP; today, a larger percentage of respondents (68%) regularly communicates with the NOP to discuss the regulation
<p>To understand the emerging and evolving challenges organic certifiers face implementing the NOP rules and the strategies employed to overcome these challenges</p>	<ul style="list-style-type: none"> • Most organizations manage a website to disseminate information and provide resources to certified operations about the NOP regulation • Paying accreditation fees and preparing for the USDA audit are the most difficult accreditation tasks for certification organizations • Most certification organizations perceive inflexibility in interpreting mandated accreditation tasks • The biggest implementation challenge for certifiers is waiting for clarification on questions posed to the NOP

Objective	Findings
<p>To understand interactions within the community of organic certifiers, between the organic certifiers and the USDA, as well as among the ACA and its members</p>	<ul style="list-style-type: none"> • Certifiers interact more frequently with their clients compared to their interactions with the USDA or other certifiers • Certifiers interact with the NOP most often to resolve questions not addressed in the NOP regulation; few do so to report fraud • Certification organizations interact with other certifiers on the ACA Listserv or directly consult each other on specific products or scopes • Respondents report positive interactions with clients, the USDA, the ACA, and other certifiers.
<p>To identify the benefits of the ACA for member organizations, as well as opportunities for better services to the organic certifier community</p>	<ul style="list-style-type: none"> • Almost 80% of the respondents are members of the ACA • Several non-member respondents indicate they are located outside of the U.S. • The most popular reason for interacting with the ACA was for training • Interaction between certification organizations and ACA personnel is characterized as always or usually positive by 94% of the respondents • ACA is most effective in providing a forum for networking and discussion among its members • Respondents report ACA could be more effective by: <ul style="list-style-type: none"> ▪ Incorporating issues related to the globalization of the organic industry ▪ Finding ways to summarize useful Listserv discussions ▪ Offering more training • Respondents appreciate the work and benefits of the ACA

Conclusions

The interview and survey responses reveal challenges faced by certification organizations, both in pursuing and maintaining accreditation and implementing the NOP regulations. Specifically, both preparing for USDA audits and paying the accreditation fee present obstacles to certifiers in the accreditation process. Many certification organizations indicated implementation challenges are the result of interpretation issues like “Waiting for clarification on questions posed to the NOP” and “Applying the NOP penalty matrix”.

Overall, the study shows most certification organizations understand the mandated accreditation requirements of the NOP regulation, interact with one another in positive ways, and appreciate the services provided by the ACA. Many certification organizations are diversifying the services they offer to their clients and believe the ACA can aid the efforts of certifiers by extending training beyond the NOP regulation.

The expanding global market for organic products may present opportunities for growth for the ACA. Several survey responses were received from organizations located outside of the United States. Many of the international respondents expressed interest in joining the ACA.

Finally, certification organizations expressed desire for a convenient way to review the ACA Listserv discussions. Some would like a summary of the exchange while others requested an archive that could be searched via keywords.

Section 1: Project Overview

Project Background

The USDA's Agricultural Marketing Service enacted the National Organic Program (NOP) in 2002 to implement provisions of the Organic Farming Production Act of 1990. In the decade since the inception of the NOP, the organic industry has experienced profound growth in sales of organic commodities, number of certified organic producers and handlers, as well as increased share of the global food market.

The increase in organic producers and handlers highlights the important role of accredited certification organizations. These groups are accredited by the USDA and evaluate operations seeking organic certification on behalf of the USDA. Certification organizations have authority to approve or deny certification based on an operation's ability to comply with the NOP regulation.

The growth and popularity of the organic products has also given rise to professional organizations that serve industry stakeholders. Some, like the Organic Trade Association, serve consumers while others, like the Organic Seed Growers and Trade Association, support producers. For the benefit of certification organizations, the Accredited Certifiers Association (ACA) was formed. The mission of the ACA is to facilitate standard implementation of the NOP by offering training, support, and a forum for discussion about implementation issues.

This report is part of a research project funded by the National Science Foundation (#1124541) entitled "Assessing Policy Designs and Improving Outcomes: An Institutional and Behavioral Analysis of the U.S. National Organic Program." In this research project, researchers from Indiana University-Purdue University Indianapolis, the University of Colorado Denver, and Duke University seek to gain a better understanding of the perceived appropriateness and effectiveness of the NOP and learn more about how the NOP policy design impacts implementation. In-depth exploration of certification organizations as industry stakeholders, including the role of the ACA, is one phase of the broader research agenda. Any opinions, findings, and conclusions or recommendations expressed in this report are those of the authors and do not necessarily reflect the views of the National Science Foundation or the Accredited Certifiers Association.

Project Data Collection Methods

This report summarizes data collected from interviews and a survey of NOP accredited certification organizations.

Interviews

In the spring of 2013, the research team interviewed 11 individuals from NOP accredited certification organizations, all of whom were ACA members. The individuals interviewed were selected according to their number of clients and geographic location to provide a representative sample of certification organizations. Interview respondents were either the directors or administrative staff within the certification organizations, all directly engaged in accreditation activities. Individuals were interviewed from public, nonprofit, and private certification organizations. The organizations ranged from very small, regional organizations with only a few employees, to large certifiers with dozens of employees engaged in certification both domestically and internationally. The interviews lasted approximately 60 minutes. The interview question guide appears as Appendix A of this report.

Online Survey

To capture a wider diversity of viewpoints and to supplement the information from the interviews, the research team created and administered an online survey. Some of the answers recorded in the certifier interviews aided the question construction on the survey. The intent was to measure prevailing perceptions among all certification organizations accredited by the NOP. An active web link to the survey instrument was sent via electronic message to 88 certifiers in all. Of the 88 individuals to whom the survey was sent, 43 individuals responded, yielding a 48.9% response rate. The questionnaire is provided in Appendix B of this report.

Section 2: Detailed Results

The following section provides a summary of results for each of the questions asked in the online survey, along with contextual notes from the interviews. This report covers demographic information and respondent attributes including sex, age, and organizational role followed by characteristics of the organizations represented, such as organization size by both number of employees and number of certified operations. To further define the organizations represented, the report also describes the business structure, the commodities certified, the locations where certification is offered and other certification services conducted by the organization. Finally, the four objectives outlined above are restated and the survey results supporting each objective are detailed.

Survey Respondent Characteristics

The survey was sent to the contact person and email address identified on the NOP list of accredited certification organizations. The survey included a few demographic questions about the individual survey respondents.

Sex

Thirty five individuals provided an answer to the question: “Are you male or female?” Respondents were nearly equally distributed with 17 females (49%) and 18 males (51%).

Age

Of the 34 respondents who indicated their age on the survey, a little over half of them (55%) appear in the uppermost age ranges, 46–55 (26%) and over 55 (29%). Six of the respondents were ages 36-45 (18%) while nine were ages 26-35 (26%). No respondents indicated their age was under 25 years old.

Organizational role

Respondents were asked to identify their role within the certification organization they represented. This question included the option to “check all that apply” allowing respondents to select multiple roles. A large majority of respondents who answered this question indicated the role of Owner or Manager (89%). Table 1 lists all of the roles and number of corresponding responses for each role.

Table 1. Professional roles of respondents (n=35)

Role	Respondents	Percent of Total Respondents
Owner or Manager	31	89%
Inspector	9	26%
Compliance officer	9	26%
Marketing specialist	2	6%
Other: Reviewer	2	6%
Administrative assistant	1	3%
Accountant	1	3%
Human resources manager	1	3%
Other: Outreach coordinator	1	3%
Other: Quality manager	1	3%

Respondent role in NOP regulation development

Respondents were asked to specify their role in the development of the NOP regulation. The possible roles and activities ranged from involvement with the early stages of NOP rulemaking through current NOP policy engagement. Respondents could select all activities that apply. For each activity shown in Table 2, there is a corresponding number of respondents as well as the percentage of total respondents. The results show a majority of respondents indicated regular communication with a USDA representative to discuss the NOP regulation. A minority of respondents reported that they contributed to the initial development of the NOP regulation.

Table 2. Respondent role in development of the NOP regulation (n=37)

Development Activity	Response	Percent of Total Respondents
In the last five years, I have regularly communicated with USDA representatives to discuss the NOP regulation.	25	68%
In the last five years, I have been a regular participant in public meetings regarding the NOP regulation.	18	49%
I have not participated in the development of the NOP regulation.	14	38%
In the last five years, I have served on at least one advisory committee or participated in processes that provided recommendations to the USDA about the NOP regulation.	11	30%
I contributed to the initial development of the NOP regulation.	6	16%

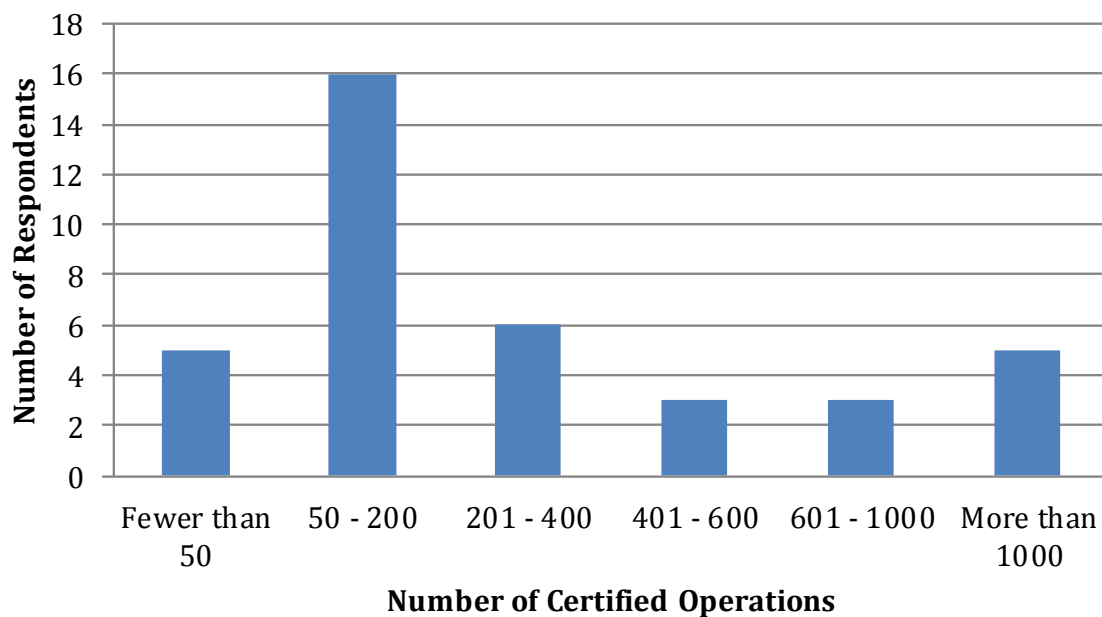
Organization Characteristics

To provide background information about organizations represented by respondents, this study included a set of questions to understand variations in the certification organization structures.

Number of certified operations

Respondents were asked to indicate the number of operations currently certified USDA Organic by their organizations. The largest portion of respondents (42%) was in the range of 50-200 certified operations. Figure 1 displays the count of total respondents for a range of certified operations.

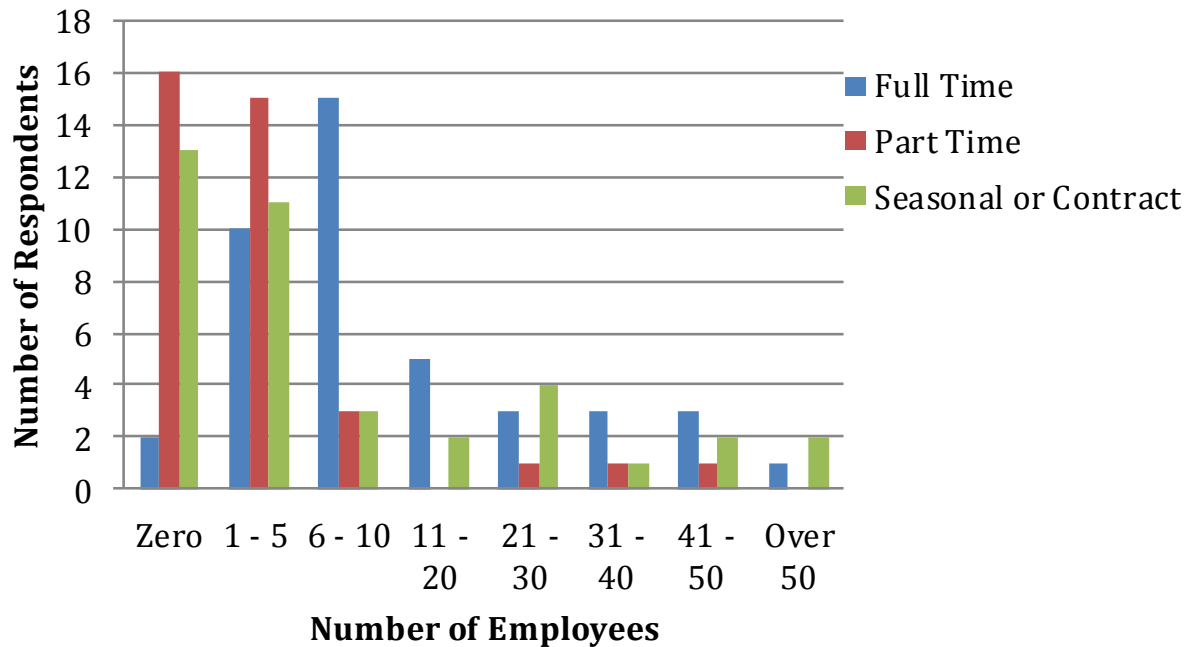
Figure 1. Respondents by number of certified operations (n=38)



Number of employees

Respondents were asked to indicate the number of full time employees, part time employees, and the number of contract or seasonal workers involved in their certification organization. The results indicate 60% of the respondents represented small organizations of 10 or fewer full time staff and two employ one part time employee. Figure 2 illustrates the range of answers provided for each employee type.

Figure 2. Respondents by type and number of employees (n=37)



Number of years operating

Respondents were asked to indicate in the survey the number of years their certification organization has been in operation. Of the 37 respondents who answered, 43% represented certification organizations operating for more than 15 years. Thirty five percent were from organizations operating between 11 – 15 years, 16% represent organizations operating for 6 – 10 years and 5% were from organizations operating between 1 -5 years. There were no respondents from certification organizations operating for less than one year.

Business structure

Respondents were asked to identify the business structure of the certification organization they represent. Table 3 shows the number of responses and percentage of the total respondents for each of the business structure categories. Most of the respondents (55%) were from private organizations.

Table 3. Business structure (n=38)

Type of Business Structure	Respondents	Percent of Total Respondents
Private	21	55%
Non-profit	9	24%
Public	7	18%
Other*	6	16%
Part of university extension	0	0

*Other included: LLC, Not for profit, State Department of Agriculture, County government, State Government, Part of University Regulatory Services

Organic commodities certified

Respondents were asked to indicate which organic commodities are produced by the operations certified by their organization. Ninety five percent of the respondents' organizations certify vegetable crops, while herb crops (87%), tree crops (87%) and field crops (89%) rank high as well. All of the responses are listed in Table 4 below.

Table 4. Products certified by respondents (n=38)

Organic Commodity	Responses	Percent of Total Respondents	
Vegetable crops	36	95%	
Grains, alfalfa, mixed hay, other field crops	34	89%	
Herb crops	33	87%	
Tree or vine fruit, nut crops	33	87%	
Brambles, berries	30	79%	
Nursery, floriculture, greenhouse crops	26	68%	
Beef	23	61%	
Eggs	23	61%	
Poultry	22	58%	
Dairy products	21	55%	
Other*	15	39%	
Pork	15	39%	
Lamb	14	37%	
Honey	14	37%	
Apiculture	13	34%	
*Other products identified are listed below. The number in parentheses identifies the number of responses if listed by more than one respondent.			
Bison	Goats	Olive oil	Spray dried products
Cheese	HABA	Pasture	Tea
Coffee	Llamas	Peanuts	Wild crops (2)
Cosmetics	Maple	Processed organic product (4)	Wine
Cotton	Maple syrup	Processed tea	Wool
Flavorings	Mushroom	Rice	Yaks

Certification services outside of the United States

Twenty one respondents (55%) indicated their organization provides certification services in countries other than the United States. Of the 38 respondents to this question, 17 indicated their organization only offers certification services within the United States. Twenty respondents identified 48 different countries outside of the United States where their organization provides certification services. Some respondents identified regions such as Latin America or continents including Europe, Asia, and Africa. The entire list of countries appears in Table 5 below. Countries identified more than once appear with the number of responses in parentheses.

Table 5. Countries where certification is provided (n=20)

Albania (2)	Hungary	Morocco	South Korea
Argentina	Iceland	Nepal	Sri Lanka
Austria	India	Nicaragua	Sweden
Bosnia Herzegovina	Indonesia (2)	Papua New Guinea	Switzerland
Canada (9)	Iran	Paraguay	Taiwan
Chile	Iraq	Peru (2)	Tanzania
China (5)	Italy (2)	Philippines	Tunisia
Ecuador	Japan (3)	Romania	Turkey (3)
Egypt	Lebanon (2)	Samoa (2)	United Arab Emirates
El Salvador	Macau	Serbia	United Kingdom
Germany	Malaysia	Singapore	Uruguay
Guatemala	Mexico (9)	Solomon Islands	Vietnam

Certification for other labeling services

Respondents indicated whether or not their organization provides certification for labeling standards other than the USDA Organic program. Of the thirty seven organizations responding, 70% indicated their organization provides certification services for other labeling standards. Table 6 below shows the additional labeling standards identified by the respondents. The number in parentheses identifies the number of responses if listed by more than one respondent.

Table 6. Labeling standards (n=26)

American Grassfed (3)	EC 834/2007 (4)	GOTS (5)	Peru (2)
Argentine Law	EC 889/2008 (2)	IBD Standards (including Non GMO and EcoSocial) (3)	Private standards
Bio Suisse (3)	Canada (equivalence)	IFOAM (5)	Restaurant Certification
Bird Friendly	EU (equivalence) (2)	Japanese Agricultural Standard (10)	Seed certification
Brazilian Legislation	Japan (equivalence)	Kosher	TE
BRC	Equiv Taiwan (equivalence)	KRAV	Transitional
CAN/CGSB 32.310, 32.311, 32.312	EU (8)	Material inputs (organic)	Tunisian Regulation
Canadian Organic Regime (7)	Fair Trade	National Standards Australia	Turkish Regulation
CARTV (Quebec)	Food Alliance	Natruue	UEBT
CCOF International Standard	Food safety	Naturland	UTZ (2)
COSMOS	GlobalG.A.P. (4)	Non-GMO	
DEMETER International (2)	Gluten Free (3)	NSF/ANSI 305 (2)	
Organic Agricultural Product and Organic Agricultural Processed Product Certification Management Regulations for Food Labeling			

Study Objectives

In the following section, we summarize survey and interview results as they relate to the study's four objectives.

Objective 1: To understand the strengths and weaknesses of the NOP, including the alignment of rules and actual practices of organic producers, handlers and certifiers, from the perspective of organic certifiers.

To address the first objective in this study, respondents were asked to indicate their level of agreement with certain statements related to the NOP regulation. Given a scale ranging from "Strongly disagree" (-2) to "Strongly agree" (+2) for each statement, respondents provided their perceptions of the NOP regulation. Respondents showed the most agreement with the statement: "The NOP regulation is necessary to maintain consistency in organic food production among different producers." The strongest disagreement was with the following statement: "The NOP regulation addresses the concerns of organic producers". The total responses are displayed in Table 7 below, ordered from the most to least agreement.

Table 7. Alignment on NOP functions (n=36)

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Mean
	(-2)	(-1)	(0)	(+1)	(+2)	
<i>The NOP Regulation...</i>						
is necessary to maintain consistency in organic food production among different producers.	0	0	0	44.4%	55.6%	1.6
supports economic development by creating highly valued commodities.	0	0	16.7%	52.8%	30.6%	1.1
maintains the ecological health of agricultural lands.	0	2.8%	16.7%	50%	30.6%	1.1
addresses public concerns about the integrity of organic commodities.	0	0	16.7%	61.1%	22.2%	1.1
provides predictable monitoring and enforcement mechanisms in organic food production.	0	5.6%	8.3%	61.1%	25%	1.1
protects the health of consumers.	0	8.3%	30.6%	30.6%	30.6%	0.8
protects the health of farm employees.	0	5.6%	36.1%	30.6%	27.8%	0.8
addresses the concerns of organic producers.	2.8%	13.9%	36.1%	33.3%	13.9%	0.4

Survey respondents were also asked to indicate to what extent the goals of their organization align with the goals of the NOP. Of the 36 respondents, 92% (33 responses) believed their organization’s goals either “Mostly align” (67%, 24 responses) or “Completely align” (25%, 9 responses) with the goals of the NOP. Only 3 respondents (8%) believed the goals of their organization only “Somewhat align” with the goals of the NOP and no respondents believe their goals “Do not align at all”.

Interview responses reflected the overall patterns reported in Table 7, above. Virtually all interviewees commented on the importance of standardized organic practices, and the role of NOP regulation in encouraging consistent standards. Differences between certifier expectations and NOP directives for how the regulations are enforced, however, came up frequently in the interviews. For example, one certifier highlighted the desire to rely on the “principle of continual improvement” in which the certifier uses its regulatory authority subjectively to encourage learning on the part of each certified operation, as opposed to the NOP expectation that noncompliance requirements are objective and applied neutrally across operations.

Objective 2: To understand the emerging and evolving challenges organic certifiers face implementing the NOP rules and the strategies employed to overcome these challenges.

From interview responses, the range of activities that certifiers engage in with their clients, and the manner in which they conduct those activities, varies widely across the certifier community. To fulfill the second objective of this project, the research team asked respondents about their organization’s implementation activities and efforts to resolve or avoid possible implementation challenges.

In relation to implementation activities, survey respondents were asked to consider some of these activities and indicate ones their organization completes. Nearly all of the respondents (92%) reported their organization manages a website that conveys informational resources relating to NOP regulation. The results for each activity are listed in Table 8.

Table 8. Activities performed by certification organizations (n=37)

Activities	Respondents	Percent of Total Respondents
Manage a website that contains informational resources relating to the NOP regulation	34	92%
Engage in informal discussions with clients regarding the NOP regulation or the organic certification process	28	76%
Regularly send a newsletter or other document to clients containing information relating to NOP regulation	22	59%
Offer training or workshops to help clients understand the content and requirements in the NOP regulation	21	57%
Host venues for clients to meet and exchange information regarding NOP regulation and the organic certification process	12	32%
Other*	6	16%
*Other activities described by respondents: <ul style="list-style-type: none"> • Answer client questions • Exhibit or speak at organic conferences and field days (3) • Conduct inspector training or workshops (2) 		

In relation to Table 8, interview responses indicated that organization structure plays an important role in determining what activities certifiers engage in, for example, if the organization has a separate education and advocacy arm. Organizational financial capacity was also identified as a common constraint in conducting activities. One certifier stated: “It’s really based on the amount of money available to the certifier in how they can run their program.”

To further reveal the challenges certifiers may face, respondents were asked to rate the difficulty of certain accreditation requirements. For each requirement, respondents specified whether each requirement is Not Difficult (0), a Minor Difficulty (+1), or a Major Difficulty (+2). Table 9 below shows the most challenging task for certification organizations is *Paying accreditation fees*, followed closely by *Preparing for USDA audit*.

Table 9. Accreditation challenges (n=37)

	Not difficulty (0)	Minor difficulty (+1)	Major difficulty (+2)	Mean
Paying accreditation fees.	24.3%	37.8%	37.8%	1.1
Preparing for USDA audit once every five years.	16.2%	59.5%	24.3%	1.1
Submitting an annual report including an update of required information, results of the most recent performance evaluations and annual program review.	43.2%	48.6%	8.1%	0.7
Conducting an annual performance evaluation and program review.	48.6%	40.5%	10.8%	0.6
Maintaining records of required certification information.	59.5%	29.7%	10.8%	0.5

Interview responses provided a more detailed understanding to the survey response variance in Table 9. In regards to accreditation fees, several public certifiers noted the difficulty of predicting accreditation fee costs when constructing annual budgets. When discussing USDA audits, interviewees often commented on the necessity of audits, but expressed concern over the increasing frequency of intermediate desk audits. A central concern around the auditing process was that USDA auditors are unfamiliar with the NOP and NOP expectations of certifiers. A comment representative of this concern was expressed by one interviewee: “[NOP staff] don’t give you answers until the auditor comes out and cites you...there’s too much guess work for us.”

Consistent with survey results, interview responses generally indicated that the annual performance evaluations and program reviews represent at most minor annoyances. Several respondents stated that these are tasks their organization would “simply perform anyway.” Interview responses regarding certification record maintenance varied widely. While several interviewees reported that recordkeeping has become a non-issue due to electronic databases that they have implemented, others maintained that recordkeeping constitutes a “major burden” for their organizations.

Another implementation concern that surfaced in certifier interview responses was varied interpretations of the NOP regulation. To examine this concern further, survey respondents were asked about the practices and preparations related to the annual report made to the NOP by their organizations. The survey offered a list of specific tasks drawn

directly from the NOP regulation. After reviewing each task, respondents marked whether they perceived the task to be Required, Optional, or Not Allowed in the standards.

All except one of the actions listed was Required according to the NOP regulation. As Table 10 shows, most of the respondents correctly identified the tasks as Required. The only task not expressly written in the standard as something a certifier “must” do is shown in the bottom row of Table 10. The NOP regulation states a certifier “may conduct additional on-site inspections of applicants for certification and certified operations to determine compliance with the Act and the regulations in this part” (7 C.F.R. § 205.403(a)(2)(i), 2013). However, the research team is aware of recent guidance from the NOP regarding mandatory inspections and residue testing expectations. Clearly, many respondents (65.7%) understood this task to be required at the time the survey was administered.

Table 10. Mandated accreditation tasks (n=35)

Required Actions		
...ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.		97.1%
...ensure that the decision to certify an operation is made by a person different from those who conducted the review of documents and on-site inspection.		94.3%
...submit to the administrator any notice of denial of certification issued pursuant to §205.405, notification of noncompliance, notification of noncompliance correction, notification of proposed suspension or revocation, and notification of suspension or revocation sent pursuant to §205.662 simultaneously with its issuance.		94.3%
...charge applicants for certification and certified production and handling operations only those fees and charges for certification activities that it has filed with the Administrator.		91.4%
...notify the inspector of its decision regarding certification of the production or handling operation site inspected by the inspector and of any requirements for the correction of minor noncompliance.		77.1%
Optional Actions	Required	Optional
...conduct additional on-site inspections of applicants for certification and certified operations to determine compliance with the Act and the regulations in this part.	65.7%	34.3%

Among the required actions listed in Table 10, interview responses revealed variation in the relative ease with which certain actions are carried out. One challenge that regularly arose during the interviews was interpretation of terms such as “sufficient expertise.” While many certifiers interpreted this to mean intimate familiarity with relevant organic agricultural practices, others questioned the need for agriculture-specific experience and advocated for educational experience in areas such as environmental policy. One respondent held that while there exists wide variation among certifiers in terms of staff expertise, as far as the respondent knew, “no certifier has ever been cited or had their accreditation threatened or revoked for not meeting that standard.”

During interviews, certifiers shared a variety of implementation experiences. Many experiences were positive but some were less than ideal. For example, while virtually all respondents recognized and appreciated the burdens and constraints placed on NOP staff, a common certifier concern was difficulty in getting answers from the NOP when inquiries were made about the appropriateness of specific practices under organic certification. A related challenge was the introduction of new products or practices to the organic industry, and a lack of guidance on the standards that should be applied to new entrants into the industry. For instance, at the time of the interviews at least half of the respondents reported that their organization did not certify apiculture due to a dearth of regulations that applied to the practice.

From the interview responses, the research team developed a list of implementation activities that may pose challenges to certification organizations. Respondents were asked to rank each activity as Not Difficult (0), a Minor Difficulty (+1), or a Major Difficulty (+2). There was also an option for the respondent to indicate the activity is not conducted by their organization. Concurrent with the interview responses, Table 11 illustrates the most difficulty is experienced by certifiers *Waiting for clarification on questions posed to the NOP*. Also indicated to be minor or major challenges for many certifiers were *Applying the NOP Penalty Matrix* and *Spreading of organic practices to products not explicitly addressed by NOP regulations*.

Although the NOP audits of certification organizations did not appear to be a “major difficulty” according to the responses to the question above, the research team received quite a bit of feedback from the interview participants and in the comments section of the survey. Commonly discontent was raised over the cost of the audits, particularly the apparent inequity of the cost relative to organization size. One respondent said: “The small agencies like us seem to pay the same as big agencies without the client base to spread it over.” Several interview respondents conveyed that auditors do not understand how certification organizations operate and that the auditors’ decisions are inconsistent from year to year. As one interview respondent stated: “Somehow the NOP needs to work with

their auditors to come to some kind of agreement over what level of recordkeeping is enough.”

Table 11. Implementation challenges (n=36-37)

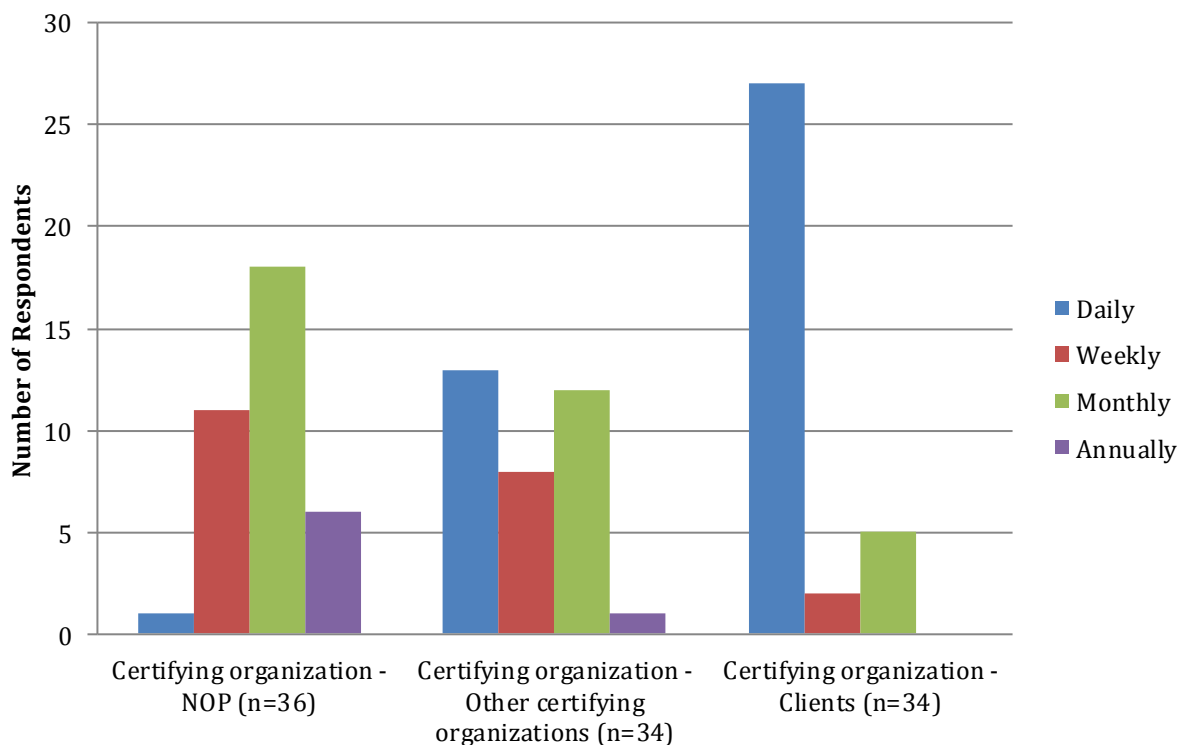
	Not difficult (0)	Minor difficulty (+1)	Major difficulty (+2)	Do not complete (NA)	Mean
Waiting for clarification on questions posed to the NOP.	8.1%	37.8%	54.1%	0	1.6
Applying the NOP Penalty matrix.	5.6%	50%	30.6%	13.9%	1.1
Testing products periodically for pesticide residue.	21.6%	45.9%	32.4%	0	1.1
Preparing for NOP “monitoring audits” of accredited certifiers in addition to the required accreditation audit that occurs every five years.	21.6%	51.4%	27%	0	1.1
Spreading of organic practices to products not explicitly addressed by NOP regulations.	5.4%	51.4%	24.3%	18.9%	1.0
Identifying genetically engineered organisms via product tests.	19.4%	33.3%	22.2%	25%	0.8
Responding to NOP investigation of clients of your organization.	29.7%	51.4%	13.5%	5.4%	0.8
Conducting unannounced inspections of organic operations in addition to annual certification inspections.	40.5%	43.2%	16.7%	0	0.8
Adhering consistently to the National List of Allowed and Prohibited Substances.	41.7%	44.4%	13.9%	0	0.7
Responding to growth of the US organic market to include imported internationally produced products.	29.7%	29.7%	10.8%	29.7%	0.5

Objective 3: To understand interactions within the community of organic certifiers, between the organic certifiers and the USDA, as well as among the ACA and its members.

To meet this objective, the research team posed several questions about the interactions among certification organizations, their clients, and NOP personnel.

Respondents answered a series of questions about their interactions with each of the following groups: other certification organizations, NOP personnel, and their own clients. For each group the respondents revealed how often interactions occur, the purpose of those interactions, and finally the tone of the interaction (positive or negative). Results show the most frequent interaction occurs between the certification organizations and their clients, although many reported daily interaction with other certification organizations as well. Figure 3 below illustrates the frequent of interactions report on the survey.

Figure 3. Frequency of interactions (n = 34-36)



To further understand the interactions among certifiers, their clients, and the NOP, the study included questions about the nature or purpose of the communication. Respondents

revealed two main reasons for interacting with NOP personnel: *To resolve questions not addressed in the NOP regulation* (92%) and *To issue a notice of noncompliance* (92%). About 39% of the respondents indicated their organization contacts NOP personnel *To seek clarifications on specific ingredients* and about 33% do so *To report fraud*. Thirty-six total survey responses were recorded. Other reasons listed for certification organizations to interact with the NOP include:

- To seek guidance on interpretation of the NOP regulation (2)
- To express concern about NOP administrative decisions (2)
- To discuss accreditation issues (2)
- To communicate changes within the certification organization
- To work through investigations with NOP compliance and enforcement

Interview responses generally reflected the reasons for interacting with the NOP consistent with survey results. Interview respondents from larger certification organizations consistently reported higher interaction frequency than those from smaller organizations, while also noting that the high interaction frequency was not reflective of certifiers as a population. Respondents from several small certifiers noted that communication with the NOP was generally one-sided, and that the NOP rarely initiates interaction with them. Similarly, one survey respondent observed that their organization's interactions with the NOP were too few to facilitate effective issue management saying, "Too often we are not aware of the direction of ongoing work, until we see the output, and then the certification community feedback leads to NOP retracting documents." Another offered, "I believe the NOP has a distant relationship with its certifiers."

Survey respondents provided answers to a similar question about the purpose for their contact with other certification organizations. There was less agreement among the 34 responses to this question as compared to the interaction with the NOP. The two most common responses chosen for this question include: *To contribute to or respond to Listserv posts* (71%) and *To consult on specific products or scopes* (68%). Another popular explanation for certifiers' interactions (41%) was *To discuss a shared client*. Several other responses were offered centering around three main topics: *To gain feedback on interpretation of NOP regulation* (3), *To discuss industry issues* (2), and *To casually visit*.

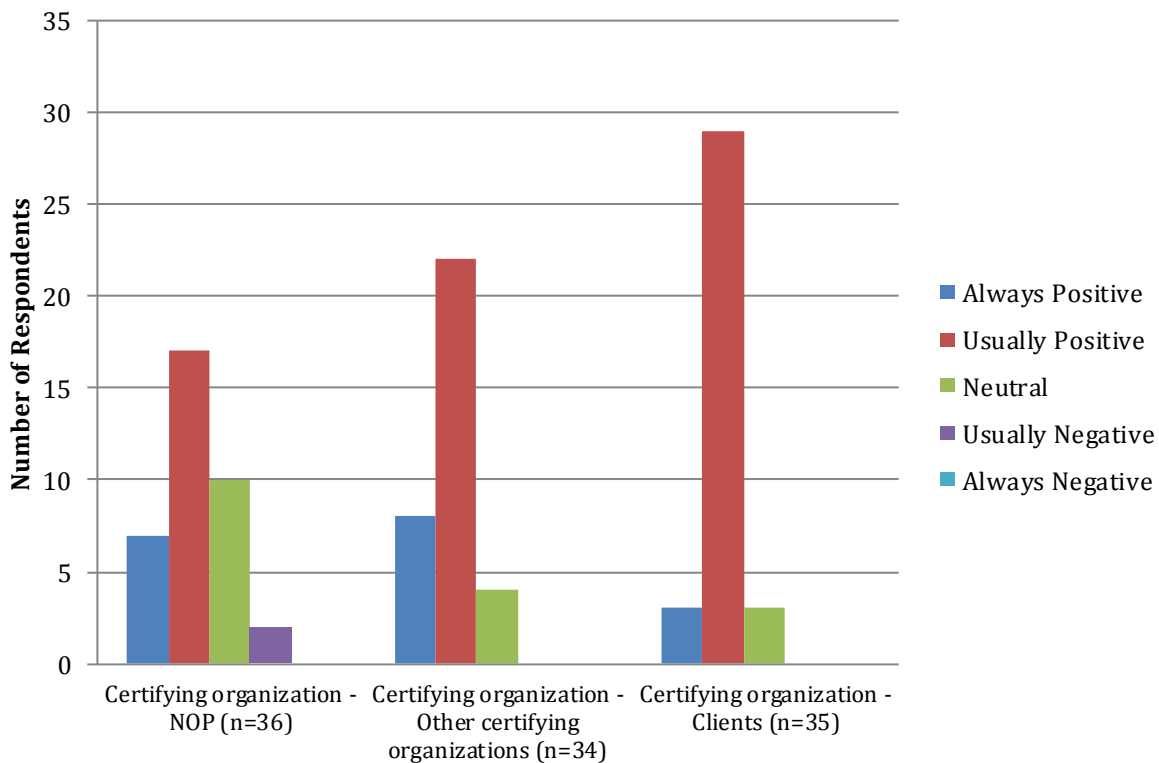
Of the 35 individuals who responded to the question about the nature of interaction between certification organizations and their clients, 100% agreed the purpose was *To respond to client inquiry*. Thirty-four respondents (97%) answered *To schedule a site visit* and 71% indicated *To make an unannounced site visit*. Other interactions described include the following:

- To seek remittance of application and inspection fees (3)

- To follow up on the submission of updated Organic System Plan (OSP)
- To share information about regulatory issues

Finally, to round out this objective, survey respondents were asked to characterize the typical nature of the exchanges. For each group of interactions, respondents selected from a scale of Always positive to Always negative to describe the overall tone of the communication. In Figure 4 below, the bar chart illustrates a comparison of the interactions among certification organizations and the NOP, other certification organizations, and clients – all of which show a majority of “Always positive” or “Usually positive” answers.

Figure 4. Tone of interactions (n = 34-36)



Interview responses indicated a variety of characterizations of the relationship and interactions between certifiers and the NOP. Despite the concerns of limited interactions with the NOP, the interactions that did occur were consistently reported to be almost always positive in nature and practically constructive. Overall, certifier perception of NOP staff was very positive, particularly in reference to recent years and the direction of Deputy Administrator Miles McEvoy. This positive perception was reflected in statements such as “[NOP staff] have made vast improvements in the quality of work and their transparency and their ability to maintain consistent guidance to certifiers. The Program has grown

leaps and bounds since Miles has taken over running it” and “We have the utmost respect with the current [NOP] staff that is in place and we work really well with them.”

Objective 4: To identify the benefits of the ACA for member organizations, as well as opportunities for better services to the organic certifier community.

This study included a series of questions intended to further the goals of the Accredited Certifiers Association (ACA) by providing feedback about the organization’s activities. These questions also contribute to the overall project by highlighting the role of this organization within the industry.

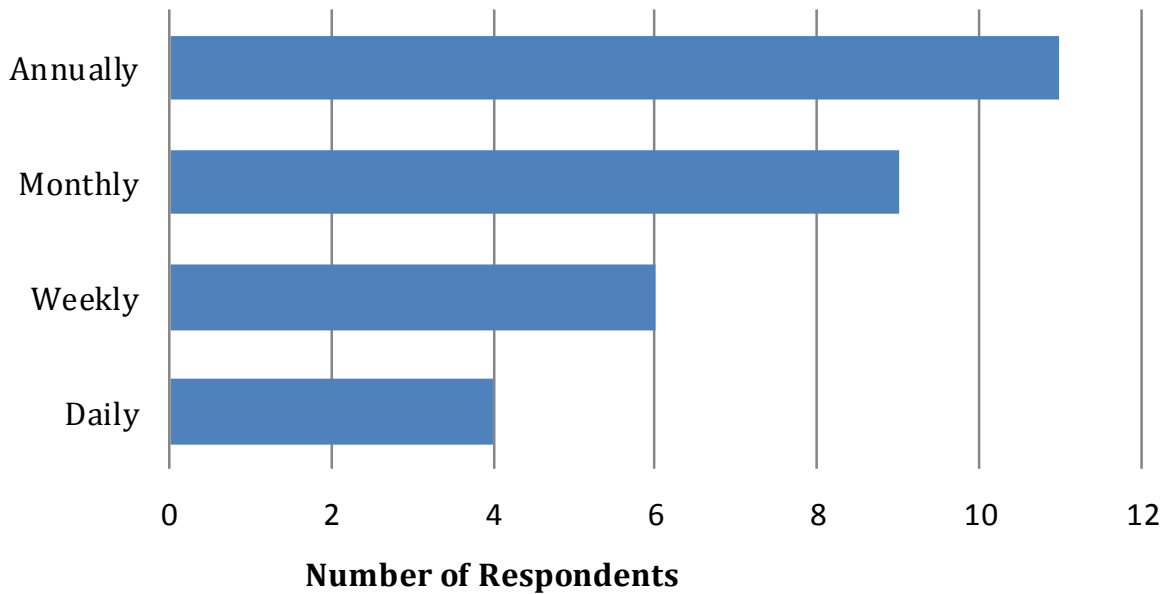
Membership participation

First, respondents were asked about their organization’s membership in the Accredited Certifiers Association (ACA). Of the 35 respondents to this question, 77% are active members of the ACA, 23% are not. Respondents who indicated their organizations are not members of the ACA were further asked about the reasons why they choose not to participate. The most common reason listed for not joining the ACA was the location of the respondent’s organization outside of the United States. A couple of respondents were unsure of the value of the ACA to their organization and another respondent reported the inability to attend meetings as a limiting factor.

Interactions with ACA

Respondents were asked to consider their interactions with the ACA while answering a series of questions about the frequency, tone, and nature of the engagements. The largest portion of respondents (37%) interacts with the ACA on an annual basis but some indicated daily interaction (13%). The results of this question are illustrated in the bar chart in Figure 5.

Figure 5. Frequency of interaction with ACA (n=30)



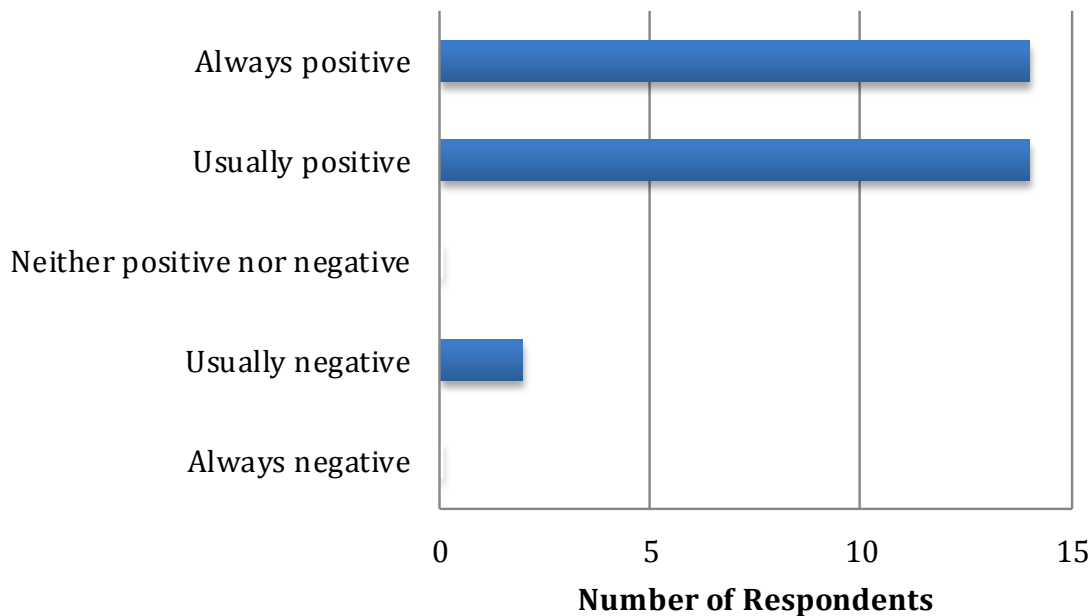
When asked about the purposes for the interaction between their organization and the ACA, respondents' most common answer was *Training* (77%). Table 12, shown below, includes the number of respondents and percent of the total respondents for each purpose. The table also contains a short list of reasons for interaction provided in the "Other" category.

Table 12. Purpose of ACA interaction (n=30)

Purpose	Respondents	Percent of Total Respondents
Training	23	77%
During participation in working groups	20	67%
Serving on ACA Board	10	33%
Other*	6	20%
*Other purposes for interacting with Accredited Certifiers Association:		
<ul style="list-style-type: none"> • Listserv and email questions (2) • Casual chatting • Never interacted • Conference calls • Surveys 		

Respondents were asked to consider the nature or tone of the interactions and assess those exchanges on a scale ranging from 1 (Always positive) to 5 (Always negative). A large majority of the 30 respondents to this question indicated the interactions were either “Always positive” or “Usually positive”. The answers are illustrated here in Figure 6.

Figure 6. Tone of interactions with ACA (n=30)



Effectiveness

To measure perceptions of the ACA’s effectiveness among the certification organizations, respondents were asked to evaluate the Association’s performance given a list of functions. The five-point scale ranged from Very ineffective (-2) to Very effective (+2). The responses, including the mean score, are shown in Table 13. According to the survey results, the ACA is most effective in providing a forum for networking and discussions.

Table 13. Evaluation of ACA performance (n=31)

	Very ineffective	Ineffective	Neither ineffective nor effective	Effective	Very effective	Mean
	(-2)	(-1)	(0)	(+1)	(+2)	
Providing a forum for discussion of issues impacting organic certification.	0	3.2%	3.2%	29%	64.5%	1.6
Providing networking opportunities for certification organizations.	0	3.2%	3.2%	35.5%	58%	1.5
Offering training for certifiers regarding NOP regulations.	0	0	9.7%	45.2%	45.2%	1.4
Developing uniform criteria for implementation of the USDA National Organic Program.	0	3.2%	19.4%	48.4%	29%	1.0
Ensuring the integrity of organic certification in the U.S.	0	3.2%	22.6%	51.6%	22.6%	0.9

Interview responses indicated similarly positive assessments of the ACA. The ACA list serve was consistently cited as a productive mechanism for posing questions, sharing information, and building consensus among certifiers that supports consistency in certifier practices. As one interviewer commented, the ACA list serve helps to “level the playing field,” encourage transparency, and reduce widely divergent practices that encourage “certifier shopping.” Working groups and the ability to present unified certifier positions on a variety of the topic to the NOP were also cited as important services that the ACA provides certifiers. In a statement reflective of the leverage the ACA provides certifiers, one respondent said by “going through the ACA and presenting to the NOP...if there’s five or six certifiers our size or larger, that absolutely is going to carry some weight.” Another

commented “It’s a pretty powerful group that if something comes out of that group, the NOP tends to listen.”

Finally, the research team asked survey respondents to describe how the ACA might be more effective in meeting the needs of organic certifiers. Respondents were allowed to enter free form text detailing their ideas. Twenty (20) respondents offered suggestions centered on a few recurring themes listed below including sample comments by survey respondents:

Internationalization

“Given the globalization of the organic food supply, the ACA is predominantly domestic with limited engagement from foreign certifiers. It would be good to have international representation.”

“If the ACA could delve into the other programs outside of just the NOP (i.e. Canada and EU) to discuss certification, implementation, and interpretation issues, it would be helpful as a certifier and also to aid in consistency of implementation of those programs.”

“Representation for international certifiers.”

Communication

“Summarize the Listserv discussion including outcome or resolution. Provide a quarterly spreadsheet of the summary.”

“It would be helpful to encapsulate the general agreement of topics on the Listserv rather than having to search the threads.”

Training Resources

“Provide resources to assist new certifiers, and their employees, such as best practice manuals for the certification process (input review, label review, etc.)”

“I would like ACA guidelines or instructions on Material Review.”

“More training.”

Certifiers interviewed for this project expressed clear appreciation for the ACA and the opportunity the organization provides for networking. Many survey respondents affirmed the actions and efforts of the ACA with their comments as well. The following comments represent the positive support for benefits the ACA provides:

- *“Considering the diversity of the group, [the ACA] does an excellent job and provides a much needed service. I cannot imagine not having the ACA.”*
- *“I enjoy the conference calls associated with State agencies and unique issues with them versus private certifiers.”*
- *“I think [the ACA] has become more diverse and stronger...The services they provide there are great – I don’t know what else they could really do.*
- *“I see no areas where they could improve. It is a very valuable resource for certifiers trying to consistently interpret the NOP rule.”*

Section 3: Summary of Results

Objective 1: To understand the strengths and weaknesses of the NOP, including the alignment of rules and actual practices of organic producers, handlers and certifiers, from the perspective of organic certifiers.

- All respondents agree the NOP is necessary to maintain consistency in organic food production (strength)
- According to results, some feel the NOP does not address the concerns of organic producers (weakness)
- 92% believe their organization's goals either "Completely align" or "Mostly align" with the goals of the NOP (strength)
- Small percentage of respondents (16%) helped develop the NOP but larger percentage regularly communicates with the NOP to discuss the regulation (68%).

Objective 2: To understand the emerging and evolving challenges organic certifiers face implementing the NOP rules and the strategies employed to overcome these challenges.

- Most organizations manage a website to disseminate information and provide resources
- Paying accreditation fees and preparing for the USDA audit are the most difficult accreditation tasks for certification organizations
- Most understand what mandated accreditation tasks as required
- Biggest implementation challenge for certifiers is waiting for clarification on questions posed to the NOP

Objective 3: To understand interactions within the community of organic certifiers, between the organic certifiers and the USDA, as well as among the ACA and its members.

- Certifiers interact more frequently with their clients compared to their interactions with the USDA or other certifiers
- Certifiers interact with the NOP most often to resolve questions not addressed in the NOP regulation; few do so to report fraud
- Certification organizations interact among other certifiers on the ACA Listserv or directly consult directly on specific products or scopes
- Respondents report mostly positive interactions among the with clients, the USDA, the ACA, and other certifiers

Objective 4: To identify the benefits of the ACA for member organizations, as well as opportunities for better services to the organic certifier community.

- Almost 80% of the respondents represent ACA member organizations
- Several non-member respondents indicate they are located outside of the U.S.
- The most popular reason for interacting with the ACA was for training
- Interaction is characterized as always or usually positive by 94% of the respondents

- ACA is most effective in providing a forum for networking and discussion among its members
- Could be more effective by:
 - Incorporating issues related to the globalization of the organic industry
 - Finding ways to summarize useful Listserv discussions
 - Offering more training
- Respondents appreciate the work and benefits of the ACA

Section 4: Conclusions

This study, part of a larger research project funded by the NSF ((#1124541) entitled “Assessing Policy Designs and Improving Outcomes: An Institutional and Behavioral Analysis of the U.S. National Organic Program,” was undertaken with the Accredited Certifiers Association to investigate the implementation of the NOP regulation from the perspective of certification organizations. A specific objective of this research included an examination of the benefits offered by membership in the ACA and opportunities for enhanced services.

The interview and survey responses reveal challenges faced by certification organizations, both in pursuing and maintaining accreditation and implementing the NOP regulations. Specifically, preparing for USDA audits and paying the accreditation fee present obstacles to certifiers in the accreditation process. Many certification organizations indicated implementation challenges are the result of interpretation “Waiting for clarification on questions posed to the NOP” and “Applying the NOP penalty matrix”.

Overall, the report shows most certification organizations understand the mandated requirements of the NOP regulation, interact with one another in positive ways, and appreciate the services provided by the ACA. Many certification organizations are diversifying the services they offer to their clients and believe the ACA can aid the efforts of certifiers by extending training events beyond the NOP regulations.

The expanding global market for organic products may present opportunities for growth for the ACA. Several survey responses were received from organizations operating outside of the United States. Respondents expressed interest in joining the ACA.

Finally, certification organizations expressed desire for a convenient way to review the ACA Listserv discussions. Some would like a summary of the exchange while others requested an archive that could be searched via keywords.

Appendix A: Interview Question Guide

Organizational Background

1. What are your responsibilities within your organization?

Probe: What activities do these responsibilities entail?

Probe: How do your responsibilities and activities relate to the NOP regulations?

2. What products does your organization certify?
3. How many organic operations does your organization currently certify and how long does a typical organic operation stay certified?
4. What are the different positions in your organizations, and what are the responsibilities associated with those roles?

Probe: Are certification tasks specified in the NOP regulations handled by different people/divisions within your organization?

5. Do you contract out any services (e.g., organic operation inspection)?
6. How are your personnel (in-house and/or contracted) trained about NOP procedures?
7. [IF the organization is not a public state organization] Is your organization a private, for profit organization, or a non-profit, 501(c)(3) organization?

Objectives 1 and 2: To understand the implementation of and compliance with the NOP.

8. From our examination of the NOP regulations, there appears to be a sequence of activities associated with the continued accreditation process. We have simplified this sequence into five steps:

(1) Conducting an annual performance evaluation and program review;

(2) Submission of an annual report including an update of required information and the results of the most recent performance evaluations and annual program review;

(3) Payment of accreditation fees;

(4) A USDA audit once every five years, at a minimum;

(5) And, ongoing record keeping of required certification information.

How is this sequence of activities similar or dissimilar to how you perceive continuing accreditation for your organization?

I am going to ask you about specific statements taken directly from the NOP about accreditation. Can you tell me about the extent that each statement is reflective of your actual practices, and how your practices may differ from each statement?

Certifying agents (for continued accreditation)...

- a.must submit a description of any training that the certifying agent has provided or intends to provide to personnel to ensure that they comply with and implement the requirements of the Act and the regulations in this part.
- b. ...must submit a description of the qualifications, including experience, training, and education in agriculture, organic production, and organic handling, for each inspector to be used by the applicant
- c. ...must conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions
- d. ...must have an annual program review of its certification activities conducted by the certifying agent's staff, an outside auditor, or a consultant who has expertise to conduct such reviews

Certifying agents (during certification)...

- a. ...must submit to the administrator any notice of denial of certification issued pursuant to §205.405, notification of noncompliance, notification of noncompliance correction, notification of proposed suspension or revocation, and notification of suspension or revocation sent pursuant to §205.662 simultaneously with its issuance.
- b. ... must notify the inspector of its decision regarding certification of the production or handling operation site inspected by the inspector and of any requirements for the correction of minor noncompliances.
- c. ...must charge applicants for certification and certified production and handling operations only those fees and charges for certification activities that it has filed with the Administrator
- d. ...may conduct additional on-site inspections of applicants for certification and certified operations to determine compliance with the Act and the regulations in this part.
- e. ...must ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.

- f. ...must ensure that the decision to certify an operation is made by a person different from those who conducted the review of documents and on-site inspection
9. What aspects of the NOP Rule have been the most difficult to implement and how have you overcome these difficulties?
 10. To what extent do certifiers strictly adhere to the NOP Rule?

Objective 3: To understand the relationship between 1) certifiers and the USDA; 2) certifiers with other certifiers; and 2) certifiers and organic operations.

11. How often do you (or members of your organization) interact with USDA personnel?
12. For what purposes do you (or members of your organization) interact with USDA personnel?
13. To what extent are these interactions positive or negative?
14. In reference to your more recent interactions, what extent have USDA enforcement personnel been effective in administering and assessing certifier compliance with the NOP rule?

Probe: Are enforcement personnel knowledgeable about organic farming processes, regulations, certification processes, the organic farming industry, etc.?

15. How often do you (or members of your organization) interact with other certifiers?
16. For what purposes do you (or members of your organization) interact with other certifiers?
17. To what extent are these interactions positive or negative?

Probe: To what extent do certifiers cooperate/compete with one another?

18. How often do you (or members of your organization) interact with organic operations?
19. For what purposes do you (or members of your organization) interact with organic operations?
20. To what extent are these interactions positive or negative?

Objective 4: To identify the benefits of the Accredited Certifiers Association for member organizations, as well as opportunities for better services to the organic certifier community.

21. What activities/actions does the Accredited Certifiers Association perform that prove valuable to organic certifiers?

Probe: How, if at all, have the services provided by the Accredited Certifiers Association changed over time?

22. What activities/actions not currently performed by the Accredited Certifiers Association would be helpful to organic certifiers?
23. What lessons have you learned over time relative to organic policy and organic certification?
24. Are there any questions regarding organic certification and the NOP that I have not asked you that you think I should have?

Appendix B: Survey Questionnaire

Accredited Organic Certifier Survey

This survey seeks to understand national organic policy and certification in the United States, including:

- National Organic Program (NOP) implementation and program administration;
- Certifier interpretation of, and action related to, the NOP regulation;
- Interactions between the NOP, accredited certifiers, and certified operations, and;
- The benefits and possible opportunities for improvement of the Accredited Certifiers Association.

If you have questions about this survey please contact Sara Miller Chonaiew via email at schonaie@iupui.edu. Please click the Next button below to begin the survey.

1 How many operations does your organization currently certify as USDA organic?

- Fewer than 50
- 50 - 200
- 201 - 400
- 401 - 600
- 601 - 1000
- More than 1000

2 How many employees does your organization currently employ?

- ____ Full time
- ____ Part time
- ____ Contract or Seasonal

3 For how many years has your organization been operating?

- Less than 1 year
- 1 - 5 years
- 6 - 10 years
- 11 - 15 years
- More than 15 years

4 Which of the following business structures best describes your organization? Check all that apply.

- Private
- Non-profit
- Other, please describe: _____
- Public
- Part of university extension

5 Please indicate the categories of organic commodities produced by the operations you certify as USDA Organic. Check all that apply.

- Vegetable crops
- Herb crops
- Nursery, floriculture, greenhouse crops
- Apiculture
- Brambles, berries
- Tree or vine fruit, nut crops
- Grains, alfalfa, mixed hay, other field crops
- Other, please list: _____
- Beef
- Poultry
- Dairy products
- Lamb
- Pork
- Honey
- Eggs

6 Does your organization provide certification services for operations in countries other than the U.S.?

- Yes
- No

Answer If Does your organization provide certification services for... Yes Is Selected

6a Please list countries outside of the U.S. for which your organization provides certification services.

7 Does your organization provide certification for labeling standards other than the USDA organic program?

- Yes
- No

Answer If Does your organization provide certification for eco labe... Yes Is Selected

7a Please list the labeling standards for which your organization provides certification.

8 In addition to certifying responsibilities included in the NOP regulation, please indicate which of the following activities your organization performs. Check all that apply.

- Offer training or workshops to help clients understand the content and requirements in the NOP regulation
- Regularly send a newsletter or other document to clients containing information relating to NOP regulation
- Manage a website that contains informational resources relating to the NOP regulation
- Host venues for clients to meet and exchange information regarding NOP regulation and the organic certification process
- Engage in informal discussions with clients regarding the NOP regulation or the organic certification process
- Other, please describe: _____

9 The NOP regulation lists general activities required for continued accreditation. Please indicate the level of difficulty associated with the following activities:

	Not difficult	Minor difficulty	Major difficulty	Do not complete
Conducting an annual performance evaluation and program review.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Submitting an annual report including an update of required information, results of the most recent performance evaluations and annual program review.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Paying accreditation fees.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preparing for USDA audit once every five years.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Maintaining records of required certification information.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10 In consideration of your organization's practices and preparations for submitting the annual report to the NOP, please indicate which practices listed below you consider Required, Optional, or Not allowed.

	Required	Optional	Not allowed
...notify the inspector of its decision regarding certification of the production or handling operation site inspected by the inspector and of any requirements for the correction of minor noncompliance.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
...charge applicants for certification and certified production and handling operations only those fees and charges for certification activities that it has filed with the Administrator.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
...conduct additional on-site inspections of applicants for certification and certified operations to determine compliance with the Act and the regulations in this part.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
...ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
...ensure that the decision to certify an operation is made by a person different from those who conducted the review of documents and on-site inspection.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
...submit to the administrator any notice of denial of certification issued pursuant to §205.405, notification of noncompliance, notification of noncompliance correction, notification of proposed suspension or revocation, and notification of suspension or revocation sent pursuant to §205.662 simultaneously with its issuance.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

11 Some certifying organizations have indicated challenges with the following implementation activities. Please indicate the level of difficulty associated with the following activities for your organization:

	Not difficult	Minor difficulty	Major difficulty	Do not complete
Applying the NOP Penalty matrix.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Conducting unannounced inspections of organic operations in addition to annual certification inspections.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Testing products periodically for pesticide residue.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Identifying genetically engineered organisms via product tests.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preparing for NOP "monitoring audits" of accredited certifiers in addition to the required accreditation audit that occurs every five years.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Responding to NOP investigation of clients of your organization.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Adhering consistently to the National List of Allowed and Prohibited Substances.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waiting for clarification on questions posed to the NOP.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Spreading of organic practices to products not explicitly addressed by NOP regulations.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Responding to growth of the US organic market to include imported internationally produced products.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

12 Please specify your role in the development of the NOP regulation. Check all that apply.

- In the last five years, I have been a regular participant in public meetings regarding the NOP regulation.
- In the last five years, I have regularly communicated with USDA representatives to discuss the NOP regulation.
- In the last five years, I have served on at least one advisory committee or participated in processes that provided recommendations to the USDA about the NOP regulation.
- I contributed to the initial development of the NOP regulation.
- I have not participated in the development of the NOP regulation.

13 Please indicate your level of agreement with each of the following statements relating to the NOP regulation. The NOP regulation...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
is necessary to maintain consistency in organic food production among different producers.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
addresses the concerns of organic producers.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
addresses public concerns about the integrity of organic commodities.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
maintains the ecological health of agricultural lands.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
protects the health of farm employees.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
protects the health of consumers.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
supports economic development by creating highly valued commodities.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
provides predictable monitoring and enforcement mechanisms in organic food production.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

14 To what extent do the goals of your organization align with the goals of the NOP?

- Completely align
- Mostly align
- Somewhat align
- Do not align at all

15 How often do you (or members of your organization) interact with NOP personnel?

- Daily
- Weekly
- Monthly
- Annually

16 For what purposes do you (or members of your organization) interact with NOP personnel?

- Seek clarifications on specific ingredients
- Resolve questions not addressed in the NOP regulation
- Report fraud
- Issue a notice of noncompliance
- Other, please list: _____

17 Are your (or members of your organization) interactions with NOP personnel generally positive or negative?

- Always positive
- Usually positive
- Neither positive nor negative
- Usually negative
- Always negative

18 How often do you (or members of your organization) interact with other certifying organizations?

- Daily
- Weekly
- Monthly
- Annually

19 For what purposes do you (or members of your organization) interact with other certifying organizations?

- Discuss a shared client
- Consult on specific products or scopes
- Contribute to or respond to Listserv posts
- Other, please list: _____

20 Are your (or members of your organization) interactions with other certifying organizations generally positive or negative?

- Always positive
- Usually positive
- Neither positive nor negative
- Usually negative
- Always negative

21 How often do you (or members of your organization) interact with your clients?

- Daily
- Weekly
- Monthly
- Annually

22 For what purposes do you (or members of your organization) interact with your clients?

- Respond to client inquiry
- Visit site - unannounced
- Visit site - scheduled
- Other, please list: _____

23 Are your (or members of your organization) interactions with your clients generally positive or negative?

- Always positive
- Usually positive
- Neither positive nor negative
- Usually negative
- Always negative

24 Are you currently a member of the Accredited Certifiers Association?

- Yes
- No

Answer If Are you currently a member of the Accredited Certifiers A... No Is Selected

24a Please describe why you are not a member of the Accredited Certifiers Association.

25 Please indicate how effective the Accredited Certifiers Association has been in performing the following functions:

	Very effective	Effective	Neither effective nor ineffective	Ineffective	Very ineffective
Ensuring the integrity of organic certification in the U.S.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing uniform criteria for implementation of the USDA National Organic Program.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Offering training for certifiers regarding NOP regulations.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing networking opportunities for certifying organizations.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing a forum for discussion of issues impacting organic certification.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

26 How often do you (or members of your organization) interact with Accredited Certifiers Association personnel?

- Daily
- Weekly
- Monthly
- Annually

27 For what purposes do you (or members of your organization) interact with Accredited Certifiers Association personnel?

- Training
- During participation in working groups
- Serving on ACA Board
- Other, please list: _____

28 Are your (or members of your organization) interactions with the Accredited Certifiers Association personnel generally positive or negative?

- Always positive
- Usually positive
- Neither positive nor negative
- Usually negative
- Always negative

29 Please describe how you think the Accredited Certifiers Association can be more effective in meeting the needs of organic certifiers.

30 Please indicate your professional role(s) within your organization. Check all that apply.

- Owner or Manager
- Administrative assistant
- Inspector
- Accountant
- Marketing specialist
- Compliance officer
- Human resources manager
- Other, please describe: _____

31 What is your age?

- Under 25
- 26 - 35
- 36 - 45
- 46 - 55
- Over 55

32 Are you female or male?

- Female
- Male

33 Is there anything else you would like to share with us related to organic accreditation, certification, and the NOP?

34 Would you like to receive a copy of the survey results?

- Yes
- No

Please click the Submit button below to complete the survey.