
INSPECTORS IN THE U.S ORGANIC FOOD INDUSTRY: CHARACTERISTICS, ROLES, AND EXPERIENCES

Summary Report

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Questions & Comments

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Introduction

Organic food marketing and labeling in the United States is governed by the United State Department of Agriculture's (USDA) National Organic Program (NOP), established by the Organic Foods Production Act of 1990. Under the NOP, operations expecting to market and sell their food products as "organic" are required to maintain organic certification and adhere to NOP regulations, which establish the practices and input substances that are allowed and prohibited in the production of organic food products.¹ NOP regulations are administered by independent certification organizations, referred to as accredited certifying agents (ACAs), from across state and county governments, and the nonprofit and private sectors.¹

ACAs rely on inspectors to monitor and report on certified organic operation practices and behaviors. The central component of an inspector's responsibilities is a facility site inspection to determine compliance with an operation's organic systems plan. Inspectors are integral to the U.S. organic food certification system, central to fostering organic food producers' compliance with NOP regulations, and as such, contribute to the integrity of the USDA organic food label. This report summarizes key characteristics, roles and experiences of organic inspectors by focusing on:

- ◇ Inspectors' backgrounds and training
- ◇ Information and material resources utilized by inspectors
- ◇ Certifier oversight of inspectors
- ◇ Inspectors' perceptions of their role
- ◇ Inspector monitoring and reporting behavior
- ◇ Trends in producer compliance levels

Study Data

The findings reported in this summary report come from an online survey of organic inspectors. 260 inspectors were sent a survey request in the spring and summer of 2014. Individuals were identified for a survey request through the support of the International Organic Inspectors Association (IOIA), and through online searches of private certifier and state departments of agriculture websites. Over a hundred survey responses were collected, a 41% response rate.²

Key Findings

- ◇ Of the inspectors surveyed, 63% are contract organic inspectors for one or more certifier (s) and 61% have worked for no more than two certifiers in the past year. Of these certifiers, 72% are non-governmental (see page 5).
- ◇ The majority of inspectors find information provided by the NOP and certifiers to be the most valuable (see page 6).
- ◇ The majority of inspectors believe training is useful and necessary. 45% agree more training should be provided and 22% of inspectors strongly agree all training should be standardized (see page 7).
- ◇ 50% of inspectors have received little training on determining appropriate field boundaries (see page 8).
- ◇ The majority of inspectors always consult the federal regulations and information provided by the certifier (see page 9).
- ◇ A strong majority (80%) always rely on personal expertise and more than 40% of inspectors usually rely on informal guidelines such as “rules of thumb” during an inspection (see page 9).
- ◇ The majority of inspectors agree that their certifier “closely” tracks their inspection activities. Close to 65% claim that certifiers do not frequently accompany them on inspections (see page 10).
- ◇ 77% of inspectors agree that their certifier enforces ethical standards on inspection practices (see page 10).
- ◇ A majority (66%), of inspectors consider themselves regulatory monitors for the NOP, and employees and representatives of the certifiers they work for (see page 11).
- ◇ Almost 50% of inspectors state they strictly interpret the NOP regulations and a majority believe potential noncompliance issues should always be reported (see page 12).
- ◇ Most inspectors (90%) agree all areas of the operation including fields, storage and off-site facilities should be examined during the inspection (see page 12).
- ◇ A majority of inspectors believe producers with a genuine concern for the environment exhibit a higher level of compliance with the NOP regulations, and almost 50% of inspectors believe producers are driven by other factors than the promise of a higher market price (see page 13).
- ◇ 37% of inspectors find penalties issued for every instance of noncompliance to be only slightly important when assessing a producer’s level of compliance, while others find unannounced inspections and product testing to be moderately important (see page 14).
- ◇ 61% of inspectors do not inspect for other food labels aside from organic, and most inspectors have either owned an organic operation or are consumers of organic food products (see pages 14 and 15).

Section One: Inspectors' Backgrounds and Training

Q1: Please indicate your current employment status as an organic inspector:

Contract organic inspector with one or more certifiers	62.5 %
Full-time organic inspector	13.5%
Part-time organic inspector	14.4%
Not currently an organic inspector	9.6%

Q2: How many different organic certifiers have you worked for in the last year?

1	39.3%
2	21.3%
3	10.1%
4	9.0%
5	15.7%
6	2.2%
More than 8	2.2%

Q3: Of the organic certifiers you have worked for in the last year, please indicate whether they were governmental or non-governmental:

Exclusively governmental	10%
Predominantly governmental	3.3%
Even between governmental and non-governmental	6.7%
Predominantly non-governmental	8.9%
Exclusively non-governmental	71.1%

Section Two: Information and Material Resources Utilized by Inspectors

Q4: Please indicate how valuable you consider the following sources of information for conducting organic inspections:

	Not applicable	Not at all valuable	Moderately valuable	Extremely valuable
National Organic Program (NOP)	1.1%	0%	20.4%	78.5%
The certifier(s) you work for	0%	1.1%	27.2%	71.7%
International Organic Inspectors Association (IOIA)	1.1%	2.2%	48.4%	48.4%
Accredited Certifiers Association (ACA)	34.9%	32.5%	24.1%	8.4%
Other, please list:	45.5%	4.5%	27.3%	22.7%

Q4a: Open-ended. Please list other sources of valuable information:

- ◇ Other inspectors
- ◇ Free and low cost webinars
- ◇ National Organic Standards Board (NOSB)
- ◇ Organic Materials Review Institute (OMRI)
- ◇ IOIA forum google group
- ◇ NOP newsletter

Q5: Please indicate your level of agreement with the following statements regarding inspector training:

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
More training should be offered by certifiers.	0%	3.2%	43%	45.2%	8.6%
Organic inspection training should be standardized for all inspectors.	3.2%	14.9%	20.2%	39.4%	22.3%
Inspector training is not useful at all.	78.3%	21.3%	0%	0%	0%
Inspectors should be required to maintain proof of periodic training.	1.1%	7.4%	11.7%	45.7%	34%
Organic inspector training is unnecessary for experienced inspectors.	35.1%	47.9%	11.7%	2.1%	3.2%
Inspectors gain a market advantage by completing training.	2.1%	6.4%	25.5%	47.9%	18.1%

Q6: Please indicate how much training you have received on the following topics:

	Not applicable	No training at all	Little training	Some training	Extensive training
Calculating Dry Matter Intake (DMI)	6.5%	8.6%	31.2%	40.9%	12.9%
Determining appropriate field boundaries	1.1%	16.1%	50%	27.7%	5.3%
Performing an inspection audit balance	0%	2.1%	42.6%	55.3%	0%
Conducting the exit interview	1.1%	10.6%	37.2%	51.1%	0%
Identifying prohibited substances in use	0%	11.7%	39.4%	47.9%	1.1%
Other, please list:	0%	3.8%	26.9%	42.3%	26.9%

Q6a: Open-ended:. Please list other training you have received:

- ◇ Food safety
- ◇ Audit trail
- ◇ Substance lists
- ◇ Specific compliance standards to international jurisdictions
- ◇ Professionalism
- ◇ Performing lot traceability exercises
- ◇ Spotting fraud
- ◇ Cover cropping
- ◇ Apiculture
- ◇ Writing and submitting reports

Q7: Please indicate how frequently you rely on the following information sources during a typical organic inspection:

	Never	Rarely	Occasionally	Usually	Always
Federal Regulation (7 CFR Part 205)	2.2%	6.6%	17.6%	24.2%	49.5%
NOP Handbook	6.6%	16.5%	40.7%	14.3%	22.0%
Material provided by the certifier	0%	1.1%	16.5%	23.1%	59.3%
Material gained from IOIA training	5.5%	20.9%	27.5%	20.9%	25.3%
“Rules of thumb” generally agreed upon by organic inspectors	12%	18.5%	29.3%	26.1%	14.1%
Personal expertise gained through experience	0%	0%	3.3%	16.3%	80.4%
Other, please list:	18.8%	0%	25%	31.3%	25%

Q7a: Open-ended. Please list other sources of information you frequently rely:

- ◇ Internet reference
- ◇ OMRI
- ◇ Natural Resource Conservation Service (NRCS)
- ◇ Wild Farm Alliance
- ◇ Land Grant Research

Section Three: Certifier Oversight of Inspectors

Q8: Please indicate your level of agreement with the following statements regarding the certifier(s) you conduct organic inspections for:

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
The certifier(s) closely tracks my inspection practices.	0%	3.2%	25.8%	47.3%	23.7%
The certifier(s) knows very little about my inspection practices.	32.2%	41.9%	18.3%	7.5%	0%
The certifier(s) enforces ethical standards on my inspection practices.	2.2%	2.2%	18.5%	48.9%	28.3%
There are few repercussions from the certifier(s) if my inspections deviate from the NOP regulations.	29.7%	47.3%	18.7%	4.4%	0%
Certification personnel frequently accompany me on inspections.	27.5%	37.4%	24.2%	7.7%	3.3%
I am frequently in contact with certification personnel during the course of inspections.	5.5%	31.9%	18.7%	36.3%	7.7%

Section Four: Inspectors' Perceptions of Their Role

Q9: Please indicate your level of agreement with the following statements regarding your role as an inspector:

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
I am primarily a regulatory monitor for the NOP.	6.5%	6.5%	13%	40.2%	33.7%
I am primarily an employee and representative of the certifier(s) work for.	10.9%	10.9%	12%	47.8%	18.5%
I am primarily a service provider to the organic operation under inspection.	22.8%	32.6%	17.4%	22.8%	4.3%
I am primarily an advocate for the organic food movement.	10.9%	28.3%	37%	16.3%	7.6%

Section Five: Inspector Monitoring and Reporting Behavior

Q10: Please indicate your level of agreement with the following statements regarding organic inspections:

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
Organic inspectors should follow the NOP regulations to the letter.	1.1%	2.2%	18.3%	49.5%	29%
An operation's inconsistent documentation should not be reported by the organic inspector if organic integrity is not threatened.	31.2%	55.9%	4.3%	6.5%	2.2%
Every potential non-compliance issue should be reported by organic inspectors without exception.	2.2%	10.8%	7.5%	51.6%	28%
Organic operations with a good track record should be given the benefit of the doubt.	17.2%	37.6%	31.2%	12.9%	1.1%
Organic inspectors should follow their own judgment when they encounter regulatory "grey areas" during inspections.	9.7%	43%	15.1%	26.9%	5.4%
All areas of the operation including fields, storage, and off-site facilities should be examined during the inspection.	0%	4.4%	5.6%	36.7%	53.3%

Section Six: Trends in Producer Compliance Levels

Q11: Do you agree or disagree that the following types of organic operators typically exhibit higher levels of compliance?

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
Operators with more organic experience.	1.1%	3.3%	16.3%	58.7%	20.7%
Operators that are genuinely concerned about the environment.	0%	4.4%	23.1%	51.6%	20.9%
Operators with more employees.	3.3%	18.5%	59.8%	13%	5.4%
Operators that produce both organic and conventional products (split or parallel production).	1.1%	22%	63.7%	9.9%	3.3%
Operators primarily motivated by the promise of a higher market price.	6.7%	38.9%	44.4%	7.8%	2.2%
Operators that produce a wider variation of organic products.	0%	13.3%	65.6%	18.9%	2.2%

Q12: Based on your experience as an organic inspector, please indicate how important each of the following reasons are for organic operator compliance with the NOP regulations:

	Not at all important	Slightly important	Moderately important	Extremely important
Information provided to operators by certifiers	0%	1.1%	30.1%	68.8%
A strict interpretation of the regulations by certifiers and inspectors	1.1%	8.7%	58.7%	31.5%
Unannounced inspections	3.3%	25.3%	46.2%	25.3%
Product testing	2.2%	38.5%	38.5%	20.9%
Penalties for every instance of noncompliance	19.6%	37%	29.3%	14.1%

Q13: Do you inspect for programs or food labels other than organic certification? (e.g., Gluten Free, HACCP, GLOB-ALGAP, Fair Trade)

Yes	39.3%
No	60.7%

Section Seven: Survey Respondent Demographic Characteristics

Q14: Please indicate other role(s) you have held within the organic industry (check all that apply):

Organic operation owner/operator	46.2%
Certification personnel (other than inspector)	43.4%
Organic policy advocate	26.4%
Organic food consumer	72.6%
Other, please identify	28.3%

Q14a: Open-ended. Please list other roles you have held within the organics industry:

- ◇ Certifier Standards/ Policy Board
- ◇ Organic consultant
- ◇ Conservationist
- ◇ Educator
- ◇ NRCS board member

Q15: For how many years have you been conducting organic inspections?

1	3.2%
2	7.4%
3	4.3%
4	6.4%
5	5.3%
6	4.3%
7	5.3%
8	8.5%
9	3.2%
10	2.1%
Over 10 Years	50%

Q16: Please indicate the organic scope(s) for which you currently inspect (check all that apply):

Crop	84%
Livestock	61.3%
Handling	75.5%
Wild Crop	53.8%

Q17: Please indicate your age:

Under 25	1.1%
26-35	10.9%
36-45	16.3%
46-55	22.8%
56-65	35.9%
Over 65	13%

End Notes

- 1 Agricultural Marketing Service. (2013). USDA agricultural marketing service: national organic program. Retrieved from <http://www.ams.usda.gov/AMSV1.0/nop>.
- 2 All reported data are subject to 12-20 missing values per question.