



International Organic Inspectors Association
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May 5, 2023

Ms. Michelle Arsenault, Advisory Committee Specialist
National Organic Standards Board
USDA-AMS-NOP 1400 Independence Ave. SW
Room 2642-S, Mail Stop 0268
Washington, DC 20250-0268

Re: Docket #: AMS-NOP-22-0071

Re: Accreditation & Certification Subcommittee (CACS) Discussion Document
“Oversight Improvements to Deter Fraud: Consistent Location Identification”

Dear Ms. Arsenault:

IOIA is the leading worldwide training and networking organization for organic inspectors. Though a United-States based nonprofit 501(c)(3), IOIA operates globally with nearly 250 inspector members in over a dozen countries. Our members are the “boots on the ground” at the annual inspections of certified operators. The inspector is often the first representative in-person at the operation and sometimes the only one. We have a vested interest in confirming the accuracy of locations that make up an organic system plan.

IOIA appreciates the efforts the NOSB has made in bringing this topic forward for discussion. We respond to the questions below.

Questions from CACS Discussion Document:

- 1. Are you currently collecting field-level location information? If so, what method are you using to collect this information?***

Based on reporting within the membership of IOIA, this varies dramatically among certifiers as well as inspectors. Some agencies request an address or location for each field. Some agencies request an overview map with all locations pertaining to certified locations. This information is not always available in files received by inspectors. Many inspectors use and review Google Maps prior to and during inspection and IOIA encourages this practice, though GPS or other geospatial coordinates may not be added to the map or OSP.

IOIA would also like to acknowledge that when asked to gather field level location information, considerable time may be spent at an inspection collecting this information. Given the human capital issue that will only be magnified with SOE, it is imperative that inspectors are only VERIFYING



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information, not collecting information. Though there may be rare occasions when additional information needs to be clarified at an inspection, adding another administrative task to the inspector's list should not be the norm.

2. Which certifiers currently request GPS coordinate information to identify locations of organic fields?

Most of our inspectors have not encountered GPS requests on a regular basis. The most common methods to locate a field/facility appear to be addresses and maps.

3. Certifiers: Are you able to locate every field you certify via the information provided solely by your client (e.g., maps, field history, OSPs), or would you need the certified client to show you where the field is located?

Though this question is addressed to certifiers, inspectors find themselves facing location predicaments on a regular basis. IOIA would also like to acknowledge the importance of facility location is as relevant as field location. Though information pertaining to location may be provided to the certifier at some point in time, accurate location information is not always available or easily accessible to an inspector. For example, an address for a field may be provided in the initial application or on a Previous Land Use History form used to verify the eligibility of a field. However, this information is not always transferred to the OSP that is provided to the inspector in subsequent years. And affidavits are often stored with historical documents that are no longer perceived as relevant to current certification. Even when the data is provided, documents are often buried in countless files and take significant time to sort through and find.

The pandemic presented an opportunity to really test the ability to verify the location of a field without the operator being available. Success varied widely. In a best case scenario, each field has an address and each address maps to the exact frontage of the field. Each field has a quality map that is labeled correctly and allows one to fully see landmarks, borders, and other elements so that the inspector can be certain the location observed is indeed the certified field. The worst case scenario is a field without means to navigate to and/or a hand drawn or low quality map with indistinguishable features often due to having been faxed and/or copied too many times. In these cases, there is practically no way to identify where a field is located without the operator. These are best and worst case scenarios. Most cases are somewhere on a continuum between the best and worst scenarios. Most fields can be found eventually, but only after extensive effort and significant time.



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How coordinates are provided impacts the ability to locate fields. The NOSB mentioned that a GPS coordinate should be placed in the middle of a given field. If unannounced inspections are a priority driver for collecting this information, GPS points should be based on location that can be entered into a mapping program for navigation. One inspector gave the example of entering a data (coordinates) point located in the middle of the farm, only to find that the location where he needed to meet the farmer was across a bridgeless waterway. That methodology of using location data incurred an additional hour of backtracking. Another inspector noted that coordinates close to the road sometimes make it difficult to know where the field is actually located. For this reason, IOIA suggests the NOSB recommend that accredited certifiers require consistent information naming fields/parcels, labeling the maps of such fields/parcels, and labeling the coordinates of such fields/parcels. An inspector should be able to find a field/parcel/location to be inspected with the map and location data/reference points in the OSP.

Lastly, location needs to be considered when conducting on site unannounced inspections of operations that do not physically take possession of organic products. These types of certified operations may often be empty office buildings as we move to a more remote world. Attempts to conduct an unannounced inspection at such “locations” are typically unsuccessful, expensive, and often renders ineffective the element of surprise in the investigation. As implementation of SOE unfolds and the growth of certified handlers that operate remotely from the physical handling locations, we need a solution. It is imperative that locations are provided that will allow successful inspections not just of land and tangible assets, but reliable unannounced access to documentation, records, and people knowledgeable of the operation. Though remote and/or hybrid inspections may have a place in the future, IOIA highly encourages more dialogue regarding “virtual locations”, especially on how that will impact in-person, human interaction at high risk operations.

4. What would be the best GIS or Geospatial Tool for certifiers and inspectors to view aggregated location data via maps?

Before this question is answered, IOIA wants to be clear on how we interpret aggregated location data. We see this as meaning the aggregated GPS coordinates for each non-contiguous location for each certified organic operation. Locations should indicate each parcel, packing house, processing facility, storage warehouse, business office, or any other site at which the operation conducts certified activities and houses goods, records and/or documents.



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In general, IOIA supports this aggregation of data. However, we are also sensitive to the wide range of demographics that comprise organic producers and facilities, both domestic and international. GPS coordinates will not be readily available to plain people and those with limited technical skills or tools. Addresses, townships, track numbers, etc, may be other methods of collecting location data, though globally none of these are as universal as GPS coordinates. Even in the US, addresses that track to locations are not mandated. One inspector lived in a place where 911 was not a service and learned that was a major factor in the creation of an address. Instead, the address was listed as a postal route mailbox i.e., Route 2 Box 565, town, state, zip. How do you map a postal route? Where limitations occur people/operations should not be excluded from certification as long as a sufficient reason can be provided.

Acknowledging the obstacles, IOIA strongly prefers the Organic Integrity Database to present consistent information and proposes that GPS coordinates are the best way to document location data. When an operation cannot locate or provide GPS coordinates due to technological or other barriers, the certified operation may use other methods to identify a location if they can yield GPS coordinates. For example, an Amish dairyman may give an address for one of his parcels. Ideally, that address will be entered into the Organic Integrity Database, which will be able to produce GPS coordinates. Those GPS coordinates may then be verified at the next inspection with his consent. We would like to reiterate that the primary role of an inspector should be verification and not collection of this data.

As noted above, IOIA supports the collection of GPS coordinates. However, it is critical that additional expenses not be incurred by certifiers, inspectors or producers/operations. IOIA proposes that information that will yield GPS coordinates for each parcel be required to be entered into the Organic Integrity Database. The Organic Integrity Database then converts this information into public facing coordinates. Free, simple software, such as google maps, can then be used to map GPS coordinates from the Organic Integrity Database for use by the organic community. This, in addition to operator supplied maps and directions, should be sufficient to permit positive location both physically and on maps without operator assistance. Based upon casual observations regarding the average perceived time needed to effect changes in similar practices, we suggest that implementation be phased in over no less than two years.

Additional Comments



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Compliance

As stated throughout this comment, IOIA agrees with several of the points and the reasoning of the NOSB regarding the benefits of implementing GPS coordinates. Verification of a certified operation's OSP/OHP in the context of organic standards while on site is the essence of an inspector's role in the certification process. Clearly, we have a vested interest in the accurate documentation of a site's location. IOIA supports reporting GPS and other geospatial points for the following compliance reasons:

- Increases ability to conduct unannounced inspections.
- Facilitates more accurate assessments at inspection.
- Provides the ability to locate a field when an operator is not present (i.e. - pandemic or other obstruction to a safe on-site inspection; supports remote review).
- Facilitates a better understanding and verification of the supply chain.
- Increases accuracy in verification when fields switch between operators and/or certifiers.
- Typically, reviewers hand off inspection files to inspectors based upon the operator OSP/OHP. Clear concise location data would facilitate accurate understanding of an operation by the Reviewer. Clear concise location data would support inspector observations on the ground. Clear concise location data would support unambiguous communication between Reviewers and Inspectors, ensuring that the process is accurate and efficient from beginning to end.
- Facilitates changes and minor updates to maps.
- Location data will allow certification professionals to verify if the neighboring farm is actually organic.
- Assisting in how a grower group is to be best divided into production units. Diverse data, such as soil type, geomorphic features, proximity, transportation resources, collection sites, etc. needs to be considered in creating these units. The ability to Geo-reference farmers within 'sites' will also support scheduling more efficient grower group inspection trips as regulations require each production unit to be inspected. (Individual Farmers are sub-units). Various software platforms already offer some location capacity where regulations require it. For example, Intact provides a method



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to locate grower group facilities to meet various requirements of the EU organic regulations.

Data Collection

Accurate data is imperative to the success of the organic industry. It should be easy to find accurate location, pricing, yield, and other quantitative data regarding organic production. The Organic Integrity Database has been an incredible asset to the industry. Expanding its capacity by increasing the depth and diversity of the information it makes available will only improve the organic industry and community. Access to quality data is not only a tool that improves verification of compliance, it allows the general public to use it's creativity and ingenuity to contribute to the success of the industry.

- Location data transposed on soil and other mapping software may help illustrate correlations between soil, geography, or other factors. These areas may be further studied and researched. (USDA Web Soil Survey, NRCS cooperator resources, USGS, Google Earth)
- Transparent Food System
 - The public is able to engage with the food that they consume.
 - A platform for philanthropy and investment
 - Marketing opportunities
- Create more efficiencies within the organic and agricultural sector.
 - Inspectors can plan more efficient inspection trips. This would have a positive impact on the human capital issue currently facing the industry.
 - Data points may facilitate easier, more efficient updates and cross communication with other agricultural departments and services, such as the EQIP program/NRCS/FSA/.

Thank you again for your vision and your work on this issue.

Sincerely,

Margaret Scoles

Margaret Scoles, on behalf of the IOIA Board of Directors
Executive Director