

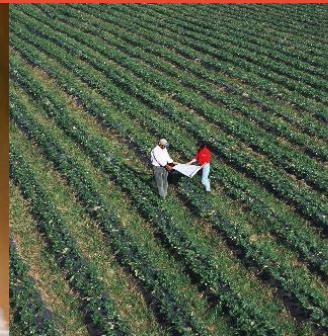
Access Link to Town Hall Recording



<http://cc.readytalk.com/play?id=egk4o6>

...or see slides, chat and attendee lists
in the pages that follow

Agricultural Marketing Service



Town Hall Logistics & Ground Rules



Webinar Rules & Reminders:

- If you are online but cannot hear, be sure to turn on your speakers.
- Your name is visible to all Town Hall participants.
- This session is being recorded.
- Use the chat box to submit input or questions.
- The slides and webinar recording will be available to the public via the NOP website.
- We are sharing the screen, so your chat messages can be seen by everyone, not just the presenters.
- This Webinar will last 60 minutes.
- For help, visit <https://support.readytalk.com/SP/>



Town Hall

Strengthening Organic Enforcement

USDA Agricultural Marketing Service (AMS)

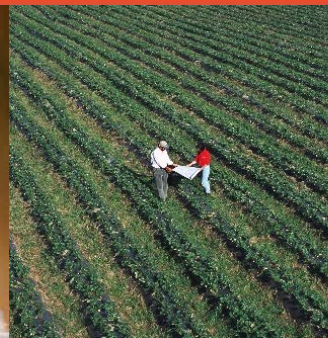
National Organic Program (NOP)

Jennifer Tucker, Ph.D., Deputy Administrator

Matthew Pavone, Policy Analyst

July 17, 2018

Agricultural Marketing Service



NOP Regulatory Pathways Forward



1

**Strong Organic
Control Systems**

**Trusted People,
Processes, and Rules**

2

**Farm to Market
Traceability**

**Worldwide Supply
Chain Integrity**

3

**Robust
Enforcement**

**A Level Playing
Field for All**

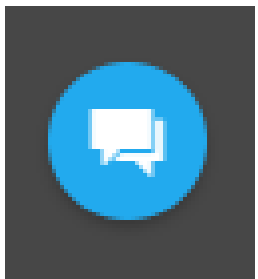
NOP Webinar Format



Overview of potential topics - two at a time.



Display 2-3 questions for response.

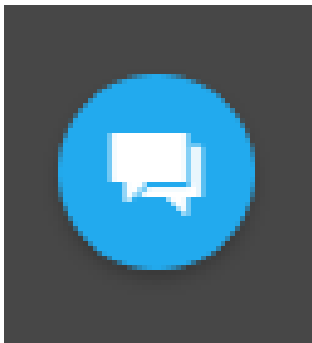


5-minute pause to 'chat' responses to the questions.

How do I 'Chat' My Input?



- Go to your chat box located in your lower left corner.
- Enter the question number followed by your input.
- For example, typing “2” followed by input shows us you’re addressing question #2.



“2 Your Input...”

Areas of Focus

- **Federated Organic Certificates**
- **Satellite Offices**

Questions

Q1: What challenges would Certifiers face if required to use a **federated organic certificate**? Is there an alternative you would suggest?

Q2: What should NOP consider with respect to accrediting **satellite offices**?

Areas of Focus

- **Inspectors: Qualifications, Training and Field Evaluations**
- **Certification of Grower Groups**

Questions

Q3: What should the minimum **qualification and training requirements** be for organic inspectors?

Q4: What specific practices might NOP consider for **Grower Groups** that are not already addressed by the 2002 and 2008 NOSB recommendations?

Areas of Focus

- **Operations excluded from organic certification**
- **Increased reporting to the organic INTEGRITY database**

Questions

Q5: Which types of **excluded** operations should be required to be certified and why?

Q6: Should any of the current **exclusions** in the USDA organic regulations remain in place?

Areas of Focus

- **Import Certificates**
- **Update regulatory requirements for equivalency arrangements**

Questions

Q7: How might the rule address **full supply chain traceability from farm to table**?

Q8: How can the rule address the integrity of organic products **imported** to the United States?

Q9: What should NOP consider about existing or future **trade arrangements**?

Areas of Focus

- **Unannounced Inspections**
- **Updates to noncompliance and appeals process**

Questions

Q10: What should NOP consider about the costs of **unannounced inspections**?

Q11: Which parts of **the noncompliance and appeal processes** might NOP need to further clarify?

Next Steps



- Ongoing Engagement
 - Meetings
 - NOP.guidance@ams.usda.gov
- National Organic Standards Board Fall Meeting
- Spring 2019 Proposed Rule
- Feedback



2018 Farm Bill & Legislative Principles



The U.S. Department of Agriculture (USDA) uniquely touches the lives of all Americans daily, through the food they eat, the fibers they wear, and the fuels they use. And U.S. producers make it all possible. Agriculture Secretary Sonny Perdue's motto to 'Do Right and Feed Everyone' has served as the inspiration to travel to more than 30 states across the nation, hearing from the men and women on the front lines of U.S. agriculture. Through these interactions, USDA developed a set of principles to share with Congress for consideration as they craft the Farm Bill and other legislation beneficial to the agricultural economy. USDA stands ready to provide counsel to Congress, and strives to be the most efficient, most effective, and most customer-focused



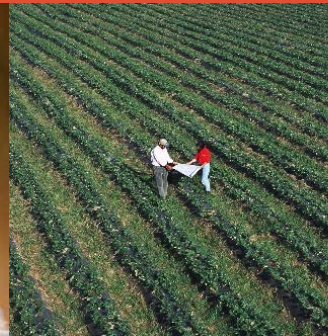
***How did you find
this Town Hall?***

***What might we do differently
next time?***

Strengthening Organic Enforcement USDA Agricultural Marketing Service (AMS) National Organic Program (NOP)

THANK YOU

Agricultural Marketing Service



Strengthening Organic Enforcement **Town Hall Chat**, July 17, 2018
 USDA Agricultural Marketing Service, National Organic Program

Sender	Message
letis letis	hello!
Kelly Abbott	Kelly Abbott-ICS yes!
Westley Baker	Wes Paramount Coffee yes
Colette Piper	Colette, Oregon Tilth. Yes! I can hear you.
veronica reyes	Veronica
Beth Unger	Beth Unger Organic Valley, yes
ellis collier	Ellis Collier- National Ag Law Center. Yes
Elise George	Elise George, OEFFA Certification - yes
Megan Megan	Megan Hoveland, Ciranda. Yes
letis letis	Matias Dortona - LETIS yes!
Richard Bertrand	Hello Ventura Foods
Rebekah Ritson	Rebekah Ritson, Grain Millers Inc. Yes
Megan McDonald	Megan. Food & Beverage Consulting Group. Yes ma'am!
Lynn Coody	Lynn Coody, Organic Agsystems Consulting. Yes, I hear you.
Irazu Lopez	Yes, Irazu Lopez CERTIMEX
Yutaka Yokote	Yutaka Yokote -Yamasa USA- Yes.
Mary Capehart	Mary Capehart CROPP
Shelby French	yes
Val Schmale	NOP CE yes i can hear you
George Kalogridis	George C Kalogridis ECOCERT
Susan Halsted	Susan - Allen Flavors - I can hear you
Annette Semper	Greetings from Organic Partners
Marni Karlin	Marni Karlin, Karlin Strategic Consulting
Marisol Oviedo	Marisol Oviedo, Northwest Horticultural Council
Gretchen Zimmer	Gretchen Zimmer, Only Natural/Bio Nutrition
Jared Clark	Jared Clark, Oregon Tilth
Shelby French	Bill Wolf - WD+A -- yes
Brittney Bauer	Brittney Bauer - Everbest Organics, Inc.
Dimitris Sotiropoulos	Dimitris Sotiropoulos: Agronomist - DS CONSULTING, Consultant for Organic Control Systems, Greece
Peter Nell	Peter Nell, California Certified Organic Farmers (CCOF)
Joan Avila	I can hear you!
Jackie DeMinter	Jackie DeMinter - MOSA Certification Policy Manager
Joan Avila	Secretary, NOP
Bob Bob	Bob Turner GrainCorp can hear you
Rebekah Finn	Rebekah Finn True Organic Products, I can hear you

Johanna Mirenda	Johanna Mirenda, OMRI
Ali Hudson	Ali Hudson - Oregon Tilth Certification Officer
Cindy Elder	Cindy Elder, OCIA
Leslie Fernandez	Leslie Fernandez - CDFA
Elizabeth Tigan	Elizabeth Tigan - NICS! Thank you
Feliciana Puig	Feliciana Puig - MOSA
Max Max	Max Goldberg - Organic Insider
Leslie Fernandez	If you can't hear, use a different browser.
Kelly Monaghan	Kelly Monaghan, Ash Street Organics, Toronto
Justina vasquez	Justina Vasquez, Bloomberg News, yes can hear
Michael Menes	Mike Menes - True Organic Products. we can hear you :)
Sandia Martin	Sandia Martin of TAB AG GROUP
Darice Wrspir	Darice Wrspir - Pacific Foods (Campbell's Soup Company)
Allison Burke	I can hear you
Beth Rota	Beth Rota - Quality Certification Services (QCS)
Daniel Burkard	Daniel Burkard, Holland & Knight
Kyla Smith	Kyla Smith, PCO
Neil Millman	Neil -- I Love Produce
Alexis Russell	Alexis Russell, Ayrshire Farm in Upperville, VA
Paul Schockman	Paul and Isaac, we don't have audio yet
Julie Paillat	Canadian Horticultural Council
Leslie Fernandez	If you can't hear, use a different browser.
Bob Puruleski	Bob Puruleski - Big Dutchman (Cage Free Poultry Equipment)
Genevieve Albers	no audio, trying a 3rd browser option...
Gibbs Wilson	Gibbs Wilson, Valent USA in Georgia
Brittany Jordan	i have audio but its very muted
Val Schmale	google chrome or firefox work best
Alexis Russell	Couldn't hear on Safari, but switched to Chrome and got sound
Gwendolyn Wyard	Gwendolyn Wyard, Organic Trade Association
Leslie Fernandez	chrome works best
Anna Maria Gottmann	Anna Maria Gottmann @Jean Niel
meredith smith	Hello, Meredith Smith from ED&F Man, here
Richard Siegel	Richard Siegel, Richard D. Siegel Law Offices
roger griess	Roger Griess Ag Tec Resources
Terry Smith	Terry Smith, Nature's Way Dairy
mike crotser	Mike Crotser - Certification Manager Organic Valley/CROPP Cooperative
Randy krieg	Randy Krieg Sacramento Ag Dept. CA
Stacy Swartwood	For audio: You can also try clicking the settings gear icon and select "Join with our Flash version at the bottom of the window" that appears

Özlem Emirler Özsan	Hi, Özlem from ETKO
Glenn Kern	Glenn Kern, Carolina Farm Stewardship Association
Rebeca Rabago	Wholesum Harvest
Ann Gaitan	Hello, Ann Marie Gaitan and Laurie Hale from Diversey, Inc.
Jeff Jeff	Jeff Yorzyk - Green Chef Organic-certified company in meal kit home delivery
Shannon Brubaker	Oregon Dept. of Ag
Brittany Jordan	egg innovations
Ashley Vulin	Davis Wright Tremaine
Michelle O'Brien	Michelle O'Brien - Wegmans Food Markets
Arturo Gonzalez	Arturo Gonzalez - Ground-Fresh International here
LUIS LOPEZ	Luis López, CCOF
Jacob Neufeld	Sunrise Foods International
Elizabeth Figueredo	Liz Figueredo - Technical Quality Manager, QAI, Inc.
Madison Kempner	Maddie Kempner, Northeast Organic Farming Association of Vermont (NOFA-VT)
Paul Schockman	Paul and Isaac Naturefresh
Sam Welsch	Sam Welsch - OneCert, Inc.
Cydnee Pletcher	Cydnee Pletcher - Progressive Agricultural Management
Marcus Caswell	Marcus Caswell- Wish Farms
Jessica Walden	Jessica Walden - QAI
Jodi Snyder	Jodi Snyder: Global Organic Alliance
Nicole Dehne	Vermont Organic Farmers
ANDRES ARMSTRONG	Chilean Blueberry Committee
Bill Wolf	Wolf, DiMatteo + Associates
Genevieve Albers	Traditional Medicinals
Ann Marie Hourigan	Whole Foods Market
Michael Corbett	Sunrise Foods International
Gianfranco Santaliz-Rogers	Hello, Is there a call in number?
Rhonda Pudwill	Has the webinar started yet?
Leslie Fernandez	yes
miraj patel	what is prior university graduation year that got the snap work registration or tanf work registration
miraj patel	how does usda intervene
Erica Lundquist	No Audio for me
Leslie Fernandez	If you can't hear, use a different browser.
Stacy Swartwood	For audio: You can also try clicking the settings gear icon and select "Join with our Flash version at the bottom of the window" that appears
miraj patel	during prior 4 years, people are waiting for usda intervention. they explained they are the snap work registration personnel.

Marty Dagoberto	pre-test said it was configured correctly, but I'm not getting audio... will you be sending out a recording?
Chairperson	Thanks so much for joining us today!
miraj patel	fruits, vegetables, grains, oats, coffees, teas
Melissa Elkins	Sustainability Coordinator, Community Food Co-op, Bellingham, WA
Chairperson	Yes, there will be a recording.
Chairperson	Your Chairperson is NOP.
Thais Agostini	Is there a phone number to call?
Valeria Frances	can not hear a thing and my headphones are working
Stacy Swartwood	If the audio is still not working, try using a different browser. Chrome and Firefox are recommended by other participants.
Amalie Lipstreu	Amalie Lipstreu-Ohio Ecological Food and Farm Association
Marty Dagoberto	yeah call in number would solve this audio problem..
miraj patel	i rather be able to earn my wages for my breakfast oatmeal and tea
JAIME GARCIA	Jaime Garcia - Kingdom Fresh Produce
JAIME GARCIA	Steve Garza - Kingdom Fresh Produce
Erin Heitkamp	I cannot hear the audio despite electing to use the Flash Player
Tessa Tripp	Tessa Tripp, International Certification Services, Inc.
miraj patel	i paid for my lunch at lasalle bank abnamro 540 madison chicago illinois december 2007 to may 2009, prior to 99 weeks unemployment insurance claim. i remember the usda salad bar at my first employer
Chairperson	As new folks are joining, please type in your name and affiliation. All chats and this webinar are being recorded.
Miles Miles	Miles McEvoy, Lacewing Auditing and Consulting
Erin Heitkamp	Erin Heitkamp - Pipeline Foods
Jody Kenworthy	Jody Kenworthy, Maryland Farm Service Agency
Karlin Warner	Karlin Warner - OneCert, Inc.
Colleen O'Brien	Colleen O'Brien, WSDA Organic Program
Marty Dagoberto	Northeast Organic Farming Association, Massachusetts Chapter
Rudy Amador	Rudy Amador - Dole Fresh Fruit
Leona Propson	Leona Propson, Briess Malt & Ingredients Company.
Jessie Jessie	Jessie Bovay, Mercaris
Melinda DeNobrega	Melinda DeNobrega -
Andy Hupp	OEFFA Certification
Allison Dermond	WSDA Organic Program
lila Haddouche	Lila Haddouche - Quality
Daniel Gagnon	Daniel Gagnon: Herbs, Etc., Inc.
Erica Lundquist	Erica Lundquist, NRCS No Audio, flash player not available, installed Chrome yesterday and had all green arrows.
Chairperson	Thanks for joining, all! Please introduce yourself as you join.

hande kemerli	Hande Kemerli , Control Union
Ann Gaitan	Can you minimize the chat? It is very distracting.
Mayze Fowler-Riggs	Mayze Fowler-Riggs, California State Organic Program
Brad Johnson	Brad Johnson-Kalmbach Feeds, Inc.
Sarah Reed	Sarah Reed - CCOF Certification Services
Gisele Atkinson	Gisele Atkinson, Council for Responsible Nutrition
Cynthia Troetschler	Cynthia Troetschler: CytoSport Inc.
Chris Grigsby	Chris Grigsby: MOFGA Certification Services
Kara Nagel	Kara Nagel, NOW Foods
Angela Anegon	Angela Anegon - WSDA Organic Program
Britt Britt	Britt Lundgren, Stonyfield
Mike Chansilp	Mike Chansilp/Vanessa Dyckman - Hain Celestial
Martina Melapie	SRS Certification
Annie Berical	Annie Berical, OCIA International
Chairperson	If you cannot hear, we will post a recording.
Ignacio Guntin	Ignacio Guntin from OIA
yasmin cedamanos	Yasmin Cedamanos, CUC
Monique Salhab	Monique Salhab, Community Development La Montanita Cooperative
SOPHIE MONTEIRO	Sophie Monteiro: Flavor Producers
miraj patel	how would usda offer explanation of the usda approach with lasalle bank abnamro 540 madison chicago illinois cafeteria novemebr 2007 to may 2009 ? how did usda select the choices there, with the coffees, smoothies, salads, paninis, pizza toaster ovens ?
Ryan Koory	Ryan Koory with Mercaris
Brittany Jordan	ok thank you
Jennifer Robinson	I cannot hear.
Cali Alexander	Cali Alexander, H. O. NOFA-NJ Bd. Member
Aubrey Lopatin	Aubrey Lopatin, Arbor Teas
Lindsay Jacob	AgroThrive, Organic fertilizer
Bhagya Kaja	Bhagya Kaja, Tastepoint by IFF
Katriana Garcia	Katriana Garcia, Bayer
Juan Guzman	Juan Guzman - Bard Valley Date Growers Association
Fatima McClain	Fatima McClain, Clover Stornetta Farms
Cynthia Morphet	Cynthia Morphet: Global Organics, LTd.
miraj patel	what are we learning now week to week with usda approach to these government efforts. when we are at local grocery stores, usda is very very very silent
Thais Agostini	Is there a phone number to call in?
Erica Lundquist	Will listen to recording. Try another platform next time!
Clara Ordoñez	Clara Ordoñez, OIA

Lee Frankel	Lee Frankel - CSO
Cameron Harsh	Cameron Harsh, Center for Food Safety
miraj patel	usda simply ignores the webinars at the grocery store
Lynn Johansen	Lynn Johansen Natures International NICS
Chairperson	No phone, listen through your computer.
Emily Brown Rosen	Emily Brown Rosen, Organic Research Associates
Jim Sattelberg	Jim Sattelberg: Everbest Organics
miraj patel	the salad bar at jewel osco indicate be silent about the faming rules in progress
martin Lichty	Martin Lichty Farm Service Agency
Gwendolyn Wyard	Will be able to provide answers to the questions after the webinar?
James Cook	James Cook, SGS
Lori Kenyon	NOFA-NY Certified Organic
Jodi Snyder	No sound.
miraj patel	whats really occurring at usda offices
Jerry Combs	Jerry Combs from Crosset Company, a produce distributor
miraj patel	what do the usda staff really know
miraj patel	how much information does usda staff know about usda's approach
Chairperson	Most folks report being able to hear - if you cannot, try a different browser, turn up speakers. If that doesn't fix it, call support.
marissa pyle	marissa pyle & jen berkebile - pennsylvania certified organic
miraj patel	how would usda staff think about agriculture economics tasks
miraj patel	pricing of food items
miraj patel	new food items available in usa after 2000
Valeria Frances	Google chrome worked
Sherine Kanagasunderam	Sherine Kanagasunderam - QTrade Teas
Mark Rokala	Mark Rokala, Organic Farmers Association
miraj patel	new food items available in usa in 1990s, in 2000s, after 2010
Marty Dagoberto	Every other webinar I've ever been a part of had a call-in option for audio.
Stacy Swartwood	For audio: You can also try clicking the settings gear icon and select "Join with our Flash version at the bottom of the window" that appears
miraj patel	usda approach state to state
miraj patel	usda's knowledge on jeanne kitchens grocery store credit
Chairperson	We anticipated a lot of interest, that's why we are using computer option. The phone option has a ceiling on users.
Chairperson	Q1 and Q2
miraj patel	how does employment network staff think this is town hall

Sam Welsch	1. The problem with certificates is not the validity of the certificate, it is the easy availability of certificates that are being used by persons who are not authorized to use it. This is the basis for much fraudulent activity.
Chairperson	Reminder - Start your answer with the number of the Q
miraj patel	how many weeks more does usda think social security is requiring this sacrifice
miraj patel	how does usda determine how to set up farms
Sam Welsch	1. There is no need to required a federated certificate. It would be sufficient to require a link to the Integrity database on a certificate.
Cynthia Morphet	1 - How do address equivalencies (e.g. EU and COR)
Rudy Amador	1. How would a federated organic certificate system deal with international organic farming ops that export to US?
Richard Mathews	Q1 WODPA supports.
Alexis Russell	Q1 : As a company that has to source organic ingredients and keep certificates current it would be much easier having a uniform certificate across all certifiers so I don't have to guess when the certificate expires
Richard Mathews	Q2 WODPA supports
miraj patel	what at jewel osco you are going to remember about your question
JAIME GARCIA	1. Federate organic certificate will need to cover international productions
miraj patel	at meijer what are people going to remember
Cynthia Morphet	1 - challenges foreign certifiers may face with language/translation issues
Juan Guzman	Q1 - A Challenge would be to reconcile all of the current certifying agencies with a Federated Organic Certificate.
Megan Megan	Q1: How would a federated organic cert work with EU traces system? How would it impact equivalency?
Sam Welsch	2. That is a good idea. OneCert has already applied for separate accreditation of our satellite office.
Annie Bercial	2: Accreditation audits should visit and review the practices of all satellite offices. If satellite offices are being accredited under the umbrella of the "home" office, they MUST be part of the accreditation audit and their practices and procedures should reflect those of the "home" office.
SOPHIE MONTEIRO	#2 I support this action
Jerry Combs	Q1 What is wrong with current accreditation and NOP certificates, and why are you wanting to change it?
Cali Alexander	2. Does/Will equivalency confer regulatory authority, fully?

Elise George	Q1: The ability to tailor certificates to the certifier's policies and the operation's specific products is essential.
Erin Heitkamp	1- Pipeline Foods supports the idea of a federated organic certificate and believes it would go a long way toward efficiently bolstering transparency and traceability.
Devin Dowell (WSDA)	1 - Issuing a federated certificate would require everyone to conform to the same taxonomy, which would not be a feasible endeavor to take on at this point. For most certifiers this would mean using 2 databases, their own db to manage inspections, workload, and processes, as well as the OID for the sole purpose of generating certificates.
miraj patel	you are at the meijer produce section, jewel-osco produce section, costco wholesale usda produce section, what specifically will be remember here. when can people purchase their own groceries under usda organic webinars this extent
Kimberly Bousquet	1 - uniformity might make it easier for certifiers to ensure their customers they are a valid entity.
Mike Chansilp	1. We support the proposal but with an option to link to Organic integrity DB.
Kyla Smith	1: duplicating work. i.e. how to integrate with existing database data
JAIME GARCIA	1. FSVP will need to be involved being that some of these items will come from foreign countries
Sarah Reed	1. As long as we can produce it using our own database system, no significant burden for CCOF. If it's through Integrity, it would have a huge impact on our effectiveness and efficiency and therefore cost of certification.
miraj patel	what is the federal certificate. you dont learn this certificate at marianos, meijer, jewel osco
Synthia Morales	Q2 - Synthia Morales Biolatina - respect to accrediting satellite offices, we think it would perhaps increase the cost of accreditations because if we have many offices then we must pay a fee for each one that may be audited at the same time during external audit?
Richard Mathews	Richard Mathews - WODPA
Mike Chansilp	1. How would this capture international certifiers?
Nicole Dehne	Q1 Certifiers would need to be able to update certificates at any time during the year. In addition, we would need to decide on exactly what categories of products are listed on certificates- for example organic tomatoes vs. organic brandywine tomatoes. Or at least need the ability to tailor the products to whatever we might need.

Lori Kenyon	Q1. support if level of detail is present and not as general as current NOP certificate program.
miraj patel	dominicks grocery store used to work in my building at lasalle bank and i think they are asking usda for the mediation and connection of events from march 2009 staged to march 2001 time.
Rudy Amador	1. Could this system include transaction certificates (such as used for exports to EU) in addition to site certification information?
Andy Hupp	1 - It is not clear what problem federated certificates would solve. NOP 2603 should be edited and straightened if additional elements are necessary to ensure organic integrity. Challenges include technology, loss of unique certifier value, and loss of flexibility in adapting to the needs of operations.
Lori Kenyon	Q2. Support
Richard Siegel	Q2 I support accreditation of satellite offices. I just learned yesterday that In India, there is recognition agreement with NOP. Operations in India certified by certifiers in India are not listed on Integrity Database. This is a gap in the database. These operations should be on the Integrity Database. As for satellite offices, some of the certifiers in India are satellites of certifiers who have NOP accreditation. Those clients in India should be on the Integrity Database.
Juan Guzman	Q1 - Another challenge would be the timing, in order to get a certificate as a grower, you need to be audited during harvest; if we only harvest once a year this means there could be a gap without coverage.
Devin Dowell (WSDA)	1 - (continued) Additionally a federated certificate would not have a measurable impact of fraud. Any certificate that is transmitted electronically would be able to vulnerable to editing.
Arturo Gonzalez	2 NOP should consider sattelite offices comply to the program the same as HQ
Kyla Smith	2: need to have clear definition of what a satellite office is. want to ensure remote work would necessitate additional accreditations
Judy Baldwin	1. It would delay the process of certifying the organic certification and make the transaction take longer.
miraj patel	how many times have i worked with dominicks grocery store, that worked at lasalle bank building, in illinois, on the mediation clearances. usda apricot scrub approach
Sam Welsch	1. The QR code on the certificate is not useful or necessary. The link to the Integrity database is sufficient.
Lee Frankel	Q2. How are satellite offices not already covered during the USDA process of reviewing the operations of the main office?

Kimberly Bousquet	2 - whether false certificates normally originate from satellite offices. Is there really a problem here?
Beth Rota	Q2. If they maintain their own procedures and policies, staff training, and make certification decisions accreditation may be appropriate. If not, satellite offices should not need their own accreditation.
megan fierst	Q1- This would add more leadtime from a business prespective. It already takes a long time frame to get a label approval. Would this add more cost to what we already incur from the certifying agency. Would USDA charge a fee for this cert?
Alexis Randolph	Q1 it is important that a certificate include brand names of products to ensure the exact product and label (ingredients) have been approved. However, disclosing brand names on a public website discloses confidential supply chain information. Time would be needed to integrate certifier and NOP databases.
Michael Menes	Q1- if federated organic certificates are made public, this may indicate volume information that could be considered private by company. consider overall numbers but keeping company name confidential.
miraj patel	where is it . dominicks rebranded as marianos, however dominicks staff that worked at lasalle bank building have not gotten resolution yet
Sarah Reed	2. Devil is in the details. What constitutes a satellite office given technological connections to centralized offices. What is and is not a satellite office, how is training of satellite office conducted, how are they managed, what is the oversight.
miraj patel	the fda salads approach with 1999 sams club
Melissa Elkins	1 and 2 - would need to have translation services
Neil Millman	Q1 -- What options exist for digital certificates? Digital offers security, validation, searchability....
Aubrey Lopatin	Q2: NOP needs to consider cultural differences in satellite offices abroad
Kimberly Bousquet	2 -- maybe not separately certified, but some higher level of oversight -- maybe increased frequency of inspection
miraj patel	how is usda organic thinking usa citizens are thinking about usda organic outside usa
Annie Bercial	2. I doubt that separately accrediting satellite offices would be affordable for most certifiers.

Devin Dowell (WSDA)	1 - (continued) a more effective but still difficult task would be to require that all valid organic certificates are publicly available online. Then a physical or electronically certificate would be moot and instead they would need to access the certificates from a specifically approved office--but this would take a substantial amount of effort and maintenance from certifiers to keep this up to date.
meredith smith	Q2 - I do not believe that the satellite office should be SEPARATELY accredited. If they have a main office and follow all same procedures, I believe that a multi-site audit should be used and rotate which office gets the audit each year.
Nicole Dehne	Q1 I would like to better understand how a federated certificate prevents fraud. Also, many certifiers have invested heavily in our own database systems, we would like to be able to generate certificates from these systems for a more seamless system for our staff.
Sarah Reed	1. The products and fields profile is highly variable and integrity does not contain sufficient info to meet market needs, e.g. brands, acreage. We would not support federating this portion.
Kate Mendenhall	Q2. Would only international (located in a separate country from main office) need separate accreditation?
Kyla Smith	2: clarification... I meant to say would NOT necessitate additional accreditations
JAIME GARCIA	2. Satellite offices should be regulated and checked frequently so the standards will be the same ones
Arturo Gonzalez	2 why do satellite offices are often under a different name?
miraj patel	inventory
miraj patel	coffees
miraj patel	teas
miraj patel	mangos
Yutaka Yokote	#1 The challenge is the related with other country regulation. How to handle with that. There are so many language.
Sam Welsch	1. A major challenge of using a federated certificate is the need to include information in a format that is not available on the federated version.
miraj patel	cereals
miraj patel	oatmeals
Ed Treacy	Q1. Fraud is a challenge. Has there been consideration for using Trellis, the framework (www.trellisframework.org) for securely sharing audit and certificate data that would prevent fraud?
Kimberly Bousquet	2 -- satellite offices should be clearly tied to their home office
miraj patel	uscis field office explains what about usda

Beth Rota	Q1 Alternative - linking to certificate on the OID to allow for verification and reduce altering certificates
Erin Heitkamp	2- I think it is more important to think about sub-contracted offices/inspectors. If the individuals are not employees of the certifying body, they should be separately accredited.
Rudy Amador	2. Separate accreditation for satellite offices would not be necessary if accredited entities oversight system is robust and adequately reviewed by NOP.
Juan Guzman	Q2- Accredited offices should be required to meet a timeline of how long it would take to certify or validate a certification, this means that if the do not meet the timeline, the could lose their status.
Judy Baldwin	Q2. what determines where the satellite offices are placed? If they hinder the process, why use them?
Alvaro Martinez	Q1: Maintain the CBs database to issue the Federated Certificates. Take into consideration if the Certificates will be only issued if the product arrives into the US or should be used for each transaction of organic NOP certified product. For complete traceability it should be for each transaction.
Alexis Randolph	Q2 - Satellite offices that do not make any certification decisions should not need accreditation. I would define the satellite office based on steps of certification and responsibility from sales to cert decision and what activities are under the control of central office versus satellite office from a quality management stand point.
James Cook	the clear procedures for accreditation must be outline and ample time to comment on.
Stephen Walker	Q1 - concern about inconsistency between expiration dates and fluidity of annual certification process.
Annie Beral	2. What problem is separately accrediting satellite offices meant to address if they are already visited by accreditors?
Andy Hupp	2-Satellite offices should be subject to the same oversight as main offices. If that requires additional audit time, then the time should be taken. If policies and procedures differ substantially from the main office, an additional annual report may be appropriate. Separate accreditation may have the unintended side effect of different compliance issues being dealt with for separate offices of the same certifier.
Kyla Smith	1: additional training would likely be needed as ACAs have distinct and different ways we approach issue certificates to operations with additional locations under one legal entity and likely different ways we are using the taxonomy.
Rudy Amador	3. Agree that it would be good to include minimum requirements and annual training for inspectors.

Sandia Martin	Q2: I don't think satellite offices should be run by non-government companies and then certified by the government. They should be RUN by the government and gov employees. This would hopefully create consistency throughout the country.
Mark Kastel	The NOP is breaking with decades of precedent in bypassing the NOSB in creating rulemaking and industry-why dialogue on important issues.
Yutaka Yokote	#2 The satellite office might have different sight from main office. It need to have easy general rule for that.
JAIME GARCIA	cant hear any more
Ashley Buhler	2: Satellite office may only have 1 person in each satellite office throughout a large state that make some certification decisions, but not all of them so they may not be able to meet all accreditation requirements, but certification costs would be too high if all people who make certification decisions and inspect had to work out of a home office.
Chairperson	Q3 and Q4
Angela Echols	Q3 - PCQI 3rd Party Trained
Heather Ganske	Q3 Completion of the IOIA training course.
Kimberly Bousquet	3 -- third party training certification similar to Produce Safety Rule, or other FSMA training requirements
Allison Burke	Generating a standardized system of training and knowledge base would only strengthen Organic Program.
JAIME GARCIA	Q3. PCQI trained as well as FSVP trained if inspecting abroad
LUIS LOPEZ	3 IOIA training and shadow inspections with a mentor
Sam Welsch	4. More specificity is required for improving consistency on how many members must be inspected. The specificity should be sound and sensible.
Kate Mendenhall	Q3: At a minimum IOIA accreditation. There should also be some sort of proven academic or practical background/experience requirement for each scope. For organic inspectors to be qualified to inspect high-risk operations, they should have some level of advanced qualifications in that subject/production area.
Beth Rota	Q4 - Observation of a grower group's internal control system site visit/control visit to at least one grower group member
Sarah Reed	3. Should require 10-16 hours of continuing education every 2 years, CCOF requires 16.
Chelsey Lenczyk	Q3 - Inspectors should be familiar with organic seed availability and varietal equivalency
Cynthia Morphet	3 - Should establish an approved training program with minimum requirements. (Need to address qualifications for inspecting growers, processors, distributors, and warehouses.

Gwendolyn Wyard	Third-party training by a trainer that is ISO accredited and approved if not accredited by USDA.
Jerry Combs	Q3 Before training requirements are made the NOP should eliminate the clause that allows certifying bodies to make it up as they go. Set it up like SQF Code.
Beth Unger	3 - need to include continuing education requirement
Cydnee Pletcher	Q3- Standardize a system of training for inspectors
Johanna Mirenda	Q4 - is group certification only limited to crop products or will livestock producer groups be eligible?
Sam Welsch	4. It should be clear that GG certification is only for crop production. It is not applicable to livestock certification.
Yutaka Yokote	#3 At least the inspectors had better have PCQI, HACCP, some 3rd Party Audit Cer. training.
Juan Guzman	Q3 - A proper Certification Program should be developed. Organic Inspectors should be required to be certified. This Certification Program should also be evaluated and updated on a consistent basis, to keep up with new regulations, pesticides, etc.
Cali Alexander	Bachelors degree in science or math,..... expanded schools for certification
Marty Mesh	Q3 test
Kyla Smith	4: define which scopes are eligible - are livestock operations (e.g. poultry) eligible? there have been mixed responses on this topic over the years
Alvaro Martinez	Q2: More than satellite offices being accredited independently, it should be better to implement other forms of improve the evaluation of the CB.
Alesia Bock	Q3 - standardized third party testing for consistency
Beth Rota	Q4 - guidance for determining what percentage of sub-units to inspect (specific risk criteria to assess and appropriate percentages depending on the overall risk).
Kate Mendenhall	Q4: Perhaps Certifiers must be accredited to certify Grower Groups, which would require a more focused look at the regulations around Grower Group certification. It is important to find a way to continue this option for very small farmers around the world.
Neil Millman	Q4 Scientific lab testing of soil or crop samples of each member.
Andy Hupp	3 - See ACA best practices on inspector qualifications. NOP assistance in providing training content could go a long way toward raising the bar and encouraging consistency.
Jerry Combs	Q4 Set it up like Group GAP audits

Kelly Monaghan	Q3 - As a baseline - IOIA basic training for areas which are being inspected (crops, livestock or processing) and then advanced training for more complex operations. I agree with Kate Mendenhall's comments on this - IOIA accreditation would be the ideal
Sarah Reed	3. Field evaluation based on risk level tiers (based on number of inspections) have been successful. All inspectors no less than every three years.
Kimberly Bousquet	3 -- required certification with a mandatory test, test repeated every 2 or so years
Synthia Morales	Q4 1. Minimum information about minimum traces allowed in restricted substances 2. Handlers certification scope
veronica reyes	Where can I get the training for organic inspector?
Mark Kastel	Unlike past rulemaking the NOSB did not just gather feedback it was charged by the NOP to create tangible rule recommendations. That is being bypassed now.
Richard Mathews	Q1 Has been an issue since 2002. NOP should implement the federal certificate regardless of push back by certifiers. The Federal Certificate program needs to address the issue of certificates being fraudulently used to represent nonorganic livestock and products as organic. this is a current problem.
Nicole Dehne	Q3 Organic Inspectors should have a B.A./B.S degree in agriculture, environmental science, food technology, food science or related field or equivalent work experience. Minimum 5 years of related field or equivalent work experience. They should have a strong background in the production area that they inspect. For example, an inspector that inspects vegetable operations should have a minimum of 2 years working on a vegetable operation.
Lori Kenyon	Q3. IOIA full week course per scope inspecting, mentorship program, & continued training recommend required # of hours
Rudy Amador	4. The key aspect for grower groups is the control system of members. Rule should establish requirements for this control system.
Sam Welsch	3. The early guidance from the NOP was that inspectors should have at least two of experience, education, or training.
Alexis Russell	Q3 : All inspectors should be required to know both the livestock and crop standards to an equal degree. We have a mixed system that skews largely to the livestock side and it's hard to find inspectors who is comfortable with livestock operations
Mary Hand	I am only able to chat here,with presenter, not in the participant feedback section

Gwendolyn Wyard	A key here is to place more emphasis on the qualifications of the trainer. Accreditation, consistency.
Erin Heitkamp	3- Inspectors should be required to pass/perform well on a test of what are considered to be best inspection and certification practices. Inspectors should be required to pass the current test on a period basis like a board exam i.e. every three to five years.
megan fierst	Q3- USDA should define requirements and training for inspectors with a certification program. USDA should take a look at how FDA initiated FSMA QI training.
Kyla Smith	3: lots of resources already out there: ACA best practices, IOIA contract
Chris Grigsby	Q3 - use ACA Best Practices recommendation for inspector qualifications. Presented last year.
Sarah Reed	3. Minimum qualifications can create challenges for multi-scope inspections. COuld result in dairies having 2 inspectors, for example.
Judy Baldwin	Q3 Minimum qualifications should be soil and crop knowledge, basic agronomy knowledge, knowledge of organic rules and regulations. formalized consistent training across the board for all inspectors.
Arturo Gonzalez	4 very important to follow up on new growers added to those groups, sometimes it is not clear when new member are added.
meredith smith	Q3 - Min 3 years experience in the industry or related industry to what they are auditing. (Have had auditors who knew very little about my industry and that lends to confusion of acceptable practices for that commodity, etc. Dont' send someone with only farm experience to audit a manufacturing facility and vice versa)
Sam Welsch	3. It is difficult to establish a minimum in one of those areas when an inspector may be very strong in the other two.
Synthia Morales	Q5 1. Minimum sample allowed for new farmers to be inspected
Michael Roberson	Q3: In addition to minimum qualifications to enter the field organic inspection, I support formal training and education to help make the organic inspection process as robust as possible. Similar to the Safe Quality Food (SQF) standard under the Global Food Safety Initiative (GFSI), USDA should consider specific industry focus areas for the minimum qualifications. Examples might include on the farm practices for fruits and vegetables; on the farm practices for animal herds; and various food processing industries such as dairy processing; meat processing; and other food types. USDA should consider ISO Audit Guide 65 as they develop the standard as a minimum quality standard for auditing.

Annie Berical	3: Inspector training program should be completed. That program may be administered by IOIA or an accredited certifying agency. A minimum requirement should also be a 4 year degree, simple because inspectors need to have acceptable writing and reading comprehension skills in order to be effective inspectors. Further background in ag or processing industry would also be desirable.
Cali Alexander	Q4- Social justice, fair practices
Alvaro Martinez	Q4: include risk assessment evaluations guidance for auditors/Certifiers
Jim Sattelberg	4 Grower groups can get too large to manage. Growers should be certified separately.
Mike Chansilp	3 - standardized training and testing to avoid inconsistent evaluations during onsite audits
Lianne Nunes	3 - Minimum qualifications should be a 3rd party training as well as detailed training by the CB employing said inspector. Inspector should also have background knowledge of scope that they are inspecting in addition to training (i.e. education and/or job experience in respective scope).
Cullen Carns-Hilliker	3. IOIA training; Knowledge of farming/processing; Knowledge of the NOS Standards; Auditing training and/or experience; Residue testing training; Personable and non-judgmental.
Danny Hernandez	Q3 - certifying body should have an detailed checklist for inspectors to follow and provide training for inspecting. Also, having an educational background in biological/chemical sciences to aid in answering questions.
Beth Rota	Q3 - Inspector training from the NOP would be helpful
Melissa Elkins	Q3 - we are a OG certified retailer and every year our business ends up having to train a new inspector on how retail establishments do recordkeeping while simultaneously participating in our audit. It takes a lot of our businesses time to do this and then we have to wait for months and months before we get any feedback on the audit, which complicates recordkeeping as we have to haul boxes of invoices in and out of storage. It would be helpful to have dedicated inspectors for each sector so we don't have to retrain them on our dime every year.
Allison Burke	3, Ability to reference NOP guidelines, understand and convey information to others.
Kimberly Bousquet	4 -- limits on the size or number of participants in grower groups
Sarah Reed	4. NOP should be ready to apply grower groups in US if allowed in other places. Many grower groups are not in fact a single legal entity.

Sam Welsch	3. Most important would be the development of a standard training curriculum that must be used by any ACA or other organization providing training.
Nicole Dehne	Q3 We currently require IOIA training within the first year of hiring an inspector and 12 annual hours of professional development thereafter.
James Cook	If not IOIA training then must establish a specific training program and make available online and in class.
Erin Heitkamp	3- Inspectors should be required to serve in an internship/residency with oversight by an experienced inspector for say three years prior to being allowed to practice independently.
Tina Sohal	3 - the requirements should be consistent for everyone. A good understanding of the organic program and how it will apply to different operations.
Mary Hand	Q3 Agree that inspectors should have proven experience in areas they audit
Alexis Randolph	Q3 please see our comments to the NOSB. QAI can also provide NOP with our specific criteria for on-boarding inspectors.
Dimitris Sotiropoulos	3 scope related academic background - 1 year minimum field working experience before working as an inspector - inspector training (NOP - ISO 19011/17065) - observation audits with senior inspectors - witnessed by senior inspector
Allison Burke	4 - Inspect grower groups annually
Stephen Walker	Q4 - Regarding vertically integrated livestock production in the US... Even assuming all sites are inspected, it's a challenge to know how best to identify who is certified (company, site managers) when issuing certificates. Certificates need to be adequately transparent. Dovetails with NOP 2603 and 4009.
Michael Menes	Q3 - organic inspectors should understand the impact of organic inputs in growing practices. understand the potential for fraud in fertilizers when growing organically. this is sometimes understated but furthermore there is no accepted method to detect or test for fraud in organic fertility.
Lianne Nunes	3 - Continued training: monitored by CB employing inspector through shadowing at least once a year as well as a yearly calibration for all employees.
Cullen Carns-Hilliker	3. Field training with experienced inspector - 3-5 inspections; Monitoring of initial inspection reports.
Brennen Herbruck	3 - Standardized. Have formal training and a minimum experience requirement in the field they are inspecting.

Lori Kenyon	Q4: inspection requirements based on size of group. Inspection volume increases as size increases.
Beth Unger	3 require a minimum amount of shadow inspections with an experienced inspector
Aubrey Lopatin	Q3: FSMA and PCQI training, specific training in the type of organization (producer/handler/etc) that s/he is inspecting
Juan Guzman	Q4. Its is important that Grower Groups are properly identified based on their needs among state lines. There are different practices and needs based on the growing region for example for citrus growers in Florida than the ones in California.
Richard Mathews	Q3 inspectors need to be trained in the field for which they will be performing inspections. they need to be tested. they need to attend the NOP certified training.
Alexis Russell	Q4 : How large does a system have to be to be considered a "grower group"? Should there be different requirements for domestic vs international groups?
Sarah Reed	4. Specific hard thresholds for sample audit failure, if you only inspect 20%, what is the threshold for failure?
Jessica Walden	Q3: IOIA training, ACA Best practices, ongoing individual certifier trainings, qualifications and effectiveness of trainers
Tina Sohal	4- the growers should be audited regularly - atleast annually
Mark Kastel	These are important and complex questions on an issue vital to the future value of the organic seal. The dialogue is being highly-controlled by USDA bureaucrats. If you sincerely wanted substantive input from the public why couldn't you brief us on the scope of the questions in advance. Now we are all just shooting from the hip.
Yutaka Yokote	#4 Much more often inspection.
Sam Welsch	4. It should be clear that any member of a GG with more than \$5000 in annual sales must be inspected annually.
Kate Mendenhall	Q3: I do think this needs to expand BEYOND just the inspectors. File reviewers in the office should also have some sort of training/expertice requirements. File reviewers must have an educational or experiential background in the scope they are reviewing.
Alyssa Mack	We can't access the chat/participant feedback-Q&A. Any thoughts?
Stacy Swartwood	There is a blue chat icon in the lower left corner of your screen.
Elizabeth Tigan	Q3: Inspectors need to have experience in the scope, education in the field is not necessary. Ability to convey ideas is sufficient. A test for all would be valuable. A requirement got mandatory training is not necessary.
Kate Mendenhall	Q3. File review staff should also be required to be accredited/complete consistent training/curriculum.

James Cook	Q4. - Risk assessment to determine if increase inspection will be needed.
mike crotser	Q4 - Animal welfare evaluation, body conditioning score, understanding of rations, pasture quality management, pasture evaluation - quality vs. quantity
Chairperson	Q5 and Q6
Jessica Walden	Q4: more clarification on how to determine percentage of growers to inspect and transition procedures (eg, adding new growers)
Cynthia Morphet	5 - Should not be any exclusions other than retailers and transporters. Everyone else should be required to be certified. Exclusions leave vulnerability to fraud and compromise traceability.
Sam Welsch	5. I agree that all types of handlers should be certified, except for transportation.
Judy Baldwin	Q5 There should be NO excluded operations.
SOPHIE MONTEIRO	Q5 Brokers and Distributors should be certified
Nicole Dehne	Q5 Any operation that takes ownership of an organic product should be required to be certified.
Rebeca Rabago	Q3: Warehouses
Kimberly Bousquet	1 -- importers esp b/c of fumigation of organic foods at ports of entry
Erin Heitkamp	5- Any and all handlers taking possession and/or brokering certified organic products should be required to be certified.
Beth Unger	6 transportation from one certified entity to another certified entity such as milk transport or animal transport to slaughter
Chris Grigsby	Q5 - excluded operations that should be required to be certified: brokers, distributors, handlers. Agree that retail and restaurants remain exempt.
Alesia Bock	Q5 - brokers and warehouses should be required to be certified
Brittney Bauer	we agree any operation that takes ownership of an organic product should be required to be certified.
Kate Mendenhall	Q5. All types of handlers should be certified, with exception of domestic transportation.
Chris Fanta	Q5: All operations should be certified with the exception of transportation.
Neil Millman	Q5: Looking at this incorrectly. Require organic certificate number of producer/ gr/ processor on the package to simplify traceability.
Sam Welsch	5. It is already required for any trans-loading site to be certified, but there is still many uncertified traders using uncertified facilities to load grain.
Jerry Combs	Q5 all should be certified including restaurants and retailers
Erin Heitkamp	6- No

Megan Megan	Q5 - support that all brokers and distributors should be certified
Genevieve Albers	Q5: the excluded operations should be allowed to continue with an affidavit and/or declaration as long as the material is not handled or in permeable packaging
James Cook	Wild caught seafood products should still be excluded but aquacultural seafood should be included
Kimberly Bousquet	5 --importers esp b/c of fumigation at the ports (misidentified as resp to question 1 earlier)
Nicole Dehne	Operations that just transport product should not be required to be certified.
Cali Alexander	Q5 Brokers and distributors should be certified; whatever entity owns title to the product, better traceability
Chris Grigsby	Q6 - retailers and restaurants remain exempt.
SOPHIE MONTEIRO	Q6 Grocers should still remain excluded.
Jackie DeMinter	Q:5 Brokers and wholesalers; to close the gap in the supply chain
Sarah Reed	5. Importers should be required to be certified as the number of risks are higher, even higher than domestic brokers. Overall brokers, traders, distributors, and wholesalers increase risk to supply chain transparency and should likely be required to be certified.
Lianne Nunes	5 - ALL operations excluding retail establishments and transporters should be certified.
Alexis Russell	Q5: If a handler has a physical location and holds any inventory they should be required to be certified since they should follow the same pest management/separation between organic/non-organic standards
Beth Unger	5 any unpackaged product including brokers and handlers should require certification
Elise George	Q6: transporters and retail food establishments should remain excluded.
Synthia Morales	Q5 brokers and distributors must be certified because there is many operators demand and its necessary to review this part of operations
Melissa Elkins	Q5 - any supplier that stores both organic and conventional produce (or other unpackaged products) should be required to have OG certification.
Mike Dill	Q5- All operations that physically handle (store, pack, process, label, etc.) organic products that are not enclosed in a sealed package should be certified.
Allison Burke	5 - support proposal, brokers, importers, traders, distributors be certified - no to restaurants and grocery stores

megan fierst	Q5- Brokers and distributors should NOT be excluded due to potential gaps of traceability.
Mike Chansilp	5 - Warehouses/Distribution Centers that handle only sealed/packaged finished goods should be exempt from certification
Emily Brown Rosen	5- agree All operations should be certified except retail and transport, this is long overdue. This will require more definition of what is considered excluded transport.
Aubrey Lopatin	Q5: Brokers, distributors and warehouses should NOT be excluded to more easily maintain a chain of custody
Alesia Bock	Q6 - only small growers, transporters, and retailers should be excluded
Michelle O'Brien	5 brokers, distributors and warehouses should be required to be certified.
Jessie Jessie	Q5/Q6: There are a number of organizations that do not take ownership, or handle organic products, but do provide a service in enabling the marketing of organic products, including bulk commodities, and ingredients. As an organization who enables buyers and sellers to connect directly and do business via an on-line platform, Mercaris helps to increase transparency in the sector. However, our on-line platform is not currently certified under the USDA NOP. We think there are both upsides and downsides to requiring all operations in the supply chain to be certified. More certifications will lead to more knowledgeable people within the supply chain but will also create barriers to entry within the space. We think it is important to work with uncertified organizations across the supply chain to understand their particular role and what impact they play on the supply chain. If the NOSB decides to require certification?it is crucial to have input from currently uncertified organizations to craft regulations that allow to continued growth in the organic markets. Last but not least, certification should precisely identify risks for compliance, and specific certification tailored to e-commerce platforms should be crafted to address the risks identified. That is, we would expect USDA certifications for brokers to be different than that of certified handlers, and, certification for on-line platforms to vary from that of traditional brokers.

Annie Berical	5. Agree that all handlers excluding those mentioned need to be certified. Uncertified brokers, in particular, cause a lot of traceability problems and chain-of-custody breaks. Storage entities who are uncertified are a point where contamination via pest control/fumigation may easily occur without the knowledge of the owner of the certified organic product.
Andy Hupp	4 - Certification should be required for all brokers and distributors that market, sell, and trade organic products.
Tina Sohal	5 Warehouses and importers.
Rudy Amador	5. Agree that all key supply chain operators should have a "chain of custody" type organic certification to improve traceability. Key operators would include the importer and the wholesaler/distributor. Companies of same group/management that undertake several functions in the supply chain should not be required to have multiple handling certifications.
Jim Sattelberg	Anyone handling or taking ownership of products should be certified
Danny Hernandez	Q5 - Since brokers and distributors store organic products, they should NOT be excluded. The only groups who should be excluded are the end users such as retailers.
Mary Hand	Q5 While I certainly understand and agree with requiring certification, documentation throughout the supply chain can be extremely difficult to secure. Am excited to see coordination with CBP on enforcement.
Nicole Dehne	Q5 Retailers and Restaurants should remain exempt.
Elizabeth Tigan	Q5: Brokers and Distributors should be certified. Anyone who takes responsibility or possession of a product should be certified.
Marty Dagoberto	Q5: Restaurants which make claims of "organic" should be certified, as they are directly benefiting from the organic market demand.
Jessica Walden	Q5: please see QAI comments to this question in the survey.
Juan Guzman	Q5 - Brokers and Selling Organizations SHOULD be required. The Industry is already requiring suppliers to be certified. This would just mean that you are catching up with Industry standards
Andy Hupp	5 - Certification should be required for all brokers and distributors that market, sell, and trade organic products.

Michael Roberson	Q6: Relative to grocery retailers, the Food Marketing Institute (FMI) has previously worked with the USDA to develop guidance for grocery retailers to operate, relative to the USDA National Organic Plan. Over the last decade, this standard has been widely adopted by the multitude of retail grocers across the nation. Based on the industry standards that have been set forth by the Food Marketing Institute, vetted by the USDA, and implemented throughout the retail grocery industry and company-owned warehouses, I support retail grocers and company-owned warehouse to remain excluded in the USDA organic regulations.
Gwendolyn Wyard	Q5 - Definitions will be extremely important, specifically to define the various players in the supply chain (transporter vs. transportation, etc.) We agree that transporters and retailers may be excluded, but clear guidance on the activities that require certification will be imperative.
Lori Kenyon	Q5: Brokers and distributors should be certified organic.
Cynthia Morphet	5 - Operations that are excluded (such as transporters) should still be required to sign an affidavit that they will comply with commingling/handling requirements to maintain organic integrity and traceability
Alesia Bock	Q6 - restaurants should remain exempt
Sam Welsch	5. If retailers continue to be excluded, there should be more enforcement by NOP, including on-site inspections, to assure that they are only selling organic products as organic.
yasmin cedamano	Q5 all operations should be certified to have control of traceability, only transportation should be excluded
Aubrey Lopatin	Q6: transport should be excluded
Beth Rota	Q6 - Retail establishments
Jerry Combs	Q6 Exclusions don't really matter as CBs are allow to make you show certs on exclusions.
Sarah Reed	6. Restaurants and retailers should remain excluded as the marketplace may not be ready. However CCOF successfully certifies restaurants and retailers and there is value in certification; increased integrity and oversight of organic claims and labels.
Annette Semper	Q5 support traders, brokers to be certified
Cali Alexander	Q6 Small farm operations,small grower groups....
Kimberly Bousquet	5. all entities that touch organic produce/commodities should have some level of certification. Maybe a lower standard for transporters, etc..., but they still must have a basic understanding of how the organic products they are transporting, etc... must be maintained.

jake lewin	Q6, mainly only for trucking for very limited definition of true brokering. not taking of title/ownership etc.
Alesia Bock	Q5 - chain of custody from brokers/suppliers to handlers would be helpful
James Cook	very small operators must not be excluded to assure integrity of program.
Andy Hupp	5 - Certification should be required for operations that mix livestock minerals intended for use in organic livestock production.
Dimitris Sotiropoulos	5 Brokers/Distributors should be certified in order not to create certification "gaps" in the supply chain (room for fraud) and because by being certified they will also take more responsibility about their procurers/transactions (they will be more engaged in the Organic control system)
rebecca willows	5 Traders, Exporters, Importers, Brokers, large Retailers with off-site Distribution Centers who handle produce should be certified
Mike Dill	Q5- Retailers that have their own distribution centers need to be held to the same rules as other distributors. Just because they are a "Retailer" should not exclude them from certification. A distribution center is a distribution regardless of whether it is owned/operated by a retailer or a private company.
JAIME GARCIA	Q5. All facilities where the organic items are loaded/unloaded should be regulated and validated, but not facilities that are only related in an administrative way and has no direct handle with the product.
Deborah Deborah	Q6 - no need to change exclusions. Organic processor should be responsible for their supply chain and therefore substantiation of sourcing from warehouses, handlers, holding facilities, etc. This would be a unwise use of limited resources.
George Kalogridis	5 Every entity in the chain of custody must be certified, otherwise there is uncertainty.
Alexis Russell	Q5: Livestock transporters should absolutely be certified, there are humane standards that need to be upheld for livestock during transportation so having a certified transportation company would assure that livestock are being treated up to the standards without having to train every new transporter you work with
Melissa Elkins	5 - Retailers that sell organic produce that want to label it as such should also be required to have certification, unless they are under a certain size (farmer's markets, small single proprietor retailers, etc. exempt). This should be a requirement for all national retailers at the very least.

Marty Dagoberto	Q5: Brokers/distributors should be certified, as this is an obvious point for fraud
jake lewin	Q5. Importers would be very helpful to the marketplace, and anyone mid-supply chain that takes ownership.
Sam Welsch	6. Any excluded operations that request certification should be expected to be certified to the same regulations as those that are required to be certified.
Synthia Morales	Q6 transportation must remain being excluded
Kyla Smith	5: Yes, agree with Gwendolyn (OTA). definitely need definitions for certain types of operations - broker, importer, distributor, etc
meredith smith	Full disclosure: I am an excluded operator (distributor) #5) I believe that excluded warehouses should have better oversight. Currently an affidavit is used, but either strengthen the affidavit or make some type of very easy audit that shows that these warehouses follow basic procedures (in order to prevent fraud and commingling with conventional products.) I believe that traders/distributors should remain excluded.
Annie Berical	6. Continuing to exclude packaged ready to eat foods, even when they use the term "organic" on the packaging is very confusing to consumers. This exclusion should remain in place, but should perhaps be amended to indicate that "organic" cannot be used on packaged ready to eat product.
Kimberly Bousquet	5. with most organic fraud being related to imports, that supports certification of the entire supply chain
Beth Rota	Q5 - brokers, handlers of bulk products, exporters
Yutaka Yokote	#5 The foods scientifically cannot be segregated or detected products from normal products. Due to no evidence. #6 No
Arturo Gonzalez	Q5- imported product should required warehouse where product is received should be certified because they do handle the product, not the importer nor broker unless they do handle it themselves.
Kris Stewart	Q6 should not include temp holding facilities-buying station, truckers,
Stephen Walker	Q6 - restaurants. Some retail exemptions make sense, but we need to know scope of exclusion within the retail setting.
Tina Sohal	5- agree with definitions.
Deborah Deborah	q6 - leave those existing in place
Drew Afton	Q5 Warehouse pesticides can cause detectable contamination by pesticides not approved for use in organics.
Richard Siegel	When will you have question on increasing reporting on INTEGRITY database?

Mike Dill	Q5- brokers, traders, marketers, private-label "owners" should be certified so that their purchases, handling practices and sales are audited.
yasmin cedamano	q1 limitations for foreign operators, speed to update certificates during year
Sam Welsch	6. The NOP should immediately implement a robust traceability auditing system that can trace products from source to final package.
Gwendolyn Wyard	Strongly agree that everyone in the supply chain should be certified. Consider a registration process for retailers and transporters that are handling organic products, if excluded. Increased oversight of excluded operations is greatly needed.
Melissa Elkins	5 - agree with those that commented about livestock transporters being certified, although livestock rules aren't even close to being stringent enough.
Sandia Martin	Q 5 & 6: How about if you create a secondary type of certification. In the marijuana realm, you can get a license to be a grower OR a processor/handler. Could you do a secondary certification for transporters/handlers/importers, etc. ? Their certification and training would be much different than one for a grower.
Elise George	Q6: I agree with Sam re: NOP review of retail food establishments records.
Feliciana Puig	5- brokers and wholesalers should be certified to close the gap in the supply chain
meredith smith	Q6 - full disclosure, I am an excluded operator. I believe that traders should remain excluded as I do not believe that fraud will be prevented by having traders certified - especially traders that do not take physical possession of product.
hande kemerli	Q5 trader , broker should be.
Dimitris Sotiropoulos	Generally speaking, exclusions undermine the integrity of the control system and negatively challenge consumer confidence
Lianne Nunes	6 - Restaurants should remain excluded. Handlers that mix livestock minerals should be certified.
Richard Mathews	Q5 Anyone who purchases an organic product for sale to someone else (excluding a consumer should be certified. For an example a hay broker who purchases hay from a hay producer for resale to an organic dairy, should be certified as a handler.
Deborah Deborah	Definitions: definitions should be consistent with NOP and FSMA.
Sam Welsch	6. The NOP traceability audit would help detect much of the fraudulent trading that is currently occurring.
Andy Hupp	6 - If exclusions are to remain in place, clarification is needed on what "packaged or otherwise enclosed in a container" means

Neil Millman	Q? I didn't see a question # on input to the organic integrity database input. again, look at it differently. change the input process to ensure accurate info. check (click) boxes and dropdowns are the best way to assure consistent input integrity
Kimberly Bousquet	6. agree restaurants should still be excluded
Mary Hand	Q5 Clarity on private branded industry handling would be greatly appreciated - for example, trader using a separate manufacturer for private label item
Juan Guzman	Q6. The scope of the exclusions is too broad. There should be a minimum requirement for organic handlers to have some sort of certification. If a shipper, restaurant, retailer etc. are claiming a organic expertise, product etc, we need to make sure that they have a minimum training or knowledge.
jake lewin	Missed Q#, increased frequency, quality and completeness of data from certifiers should be a part of integrity. including not solely certified entity information. Reporting on who received samples/Unannounced inspections and inspectors etc. could facilitate oversight. As a general rule certifier reporting is a negligible actual cost.
Sam Welsch	5. Integrity database must be updated immediately when an operation is suspended or surrenders certification. Regulations already require certifiers to immediately notify NOP when sending a Notice of Suspension.
Tina Sohal	agree with Juan..a minimum of knowledge is required for who are handling organic products
Chairperson	Q7, Q8, Q9
Jerry Combs	Q-7 Utilize Block Chain Technology
Kimberly Bousquet	7 -- require use of blockchain technology
Rudy Amador	8. Use of import certificates is a good idea to help avoid fraud. Key is a system that does not create unnecessary burden to trade participants. Consider using same electronic system (Traces) implemented by EU last year.

Andy Hupp	7 - The NOP should use high risk protocols and cross checking between accredited certifiers as part of the audit process. This is a current gap that could be exploited by unscrupulous entities. For instance, NOP could choose several large shipments of imported and/or high-risk products and, working with multiple certifiers, attempt to trace them through the supply chain. Such audit activities could be initiated through accreditation audits with follow-through by NOP staff from Washington. If discrepancies are uncovered, such activities may result in compliance and enforcement actions with the certifiers and/or operations involved in these transactions. This would undoubtedly be instructive and could be translated into further instruction, guidance, and training in the future.
Beth Rota	Q7 - requiring organic certification for all handlers, brokers, importers and exporters
JAIME GARCIA	7. Import Certificates should come in with each inbound of produce, as well as validated by SAGARPA (in Mexico). This way 2 entities will validate the certificate and eliminate the produce that is not organic.
Sam Welsch	7. NOP should have dedicated staff who can audit the entire supply chain. It is not possible for ACA to investigate more than a small segment of the supply chain.
Deborah Deborah	Q7 Organic processor should have a "supply chain/traceability" pre-requisite program as part of their OSP.
Patty Lovera	8 - implement all of the Inspector General audit recommendations.
Sarah Reed	8. Require import certificates for all imports to US. This could be very challenging for over-land shipments from Mexico and Canada.
yasmin cedamanos	q7: import certificates should be a requirement for imported products from any origin
rebecca willows	5 I agree with Sam NOP OID should be updated immediately Otherwise it is basically useless for the fast paced fresh produce business.
Michelle O'Brien	9 NOP should make sure that their organic practices are equal or above what US requires and should ensure that anytime they make a change to their policy's we are aware of the change to ensure it is still up to our standards
Alesia Bock	Q7 - block chain technology may be helpful
Jessica Walden	Q7: certification of the entire supply chain
Beth Unger	8 agree with import certificates
Sam Welsch	7. This would not require a rule change, just making it a focus.

Arturo Gonzalez	Q5 Integrity Data Base is not updated regularly, we need that info as accurate as possible to prevent fraud.
Jessica Walden	Q8: certification of importers
Synthia Morales	Q7 all the supply chain must be certified, Producers, Handlers/processors , distributors, Importers in USA, also each one must be registered with a specific scope
Andy Hupp	7 - Certify all operations involved in organic commerce
Richard Siegel	INTEGRITY DATABASE should include operations that are certified in other countries under Recognition Agreements: India, NZ, Israel.
Alexis Russell	Q7 It is my understanding that farms across the EU have stricter traceability standards than we have in the US, so I wouldn't anticipate any issues with an equivalency with the EU system when it comes to farm to table audits
Jerry Combs	Q-8 We import from other countries and require a NOP Organic Cert for the product. Therefore Import Certs are redundant and wasted cost.
Lee Frankel	Q8. Consider value of FDA Foreign Supplier Verification Program that requires importer to show that he has oversight of production practices of foreign supplier.
Sam Welsch	8. Import certificates would help from all sources.
Aubrey Lopatin	Q7/Q8: import certificates should be required for all imports
Michelle O'Brien	8 I feel that the certificate should accompany each time a product is imported to ensure that it infact is certified.
Kimberly Bousquet	7 -- agree that areas of high risk for fraud should be considered, but also increased investigation on the supply routes that are used to ship fraudulent organic food
mike crotser	Q9 - maintain organic trade arrangements with Brittan whether they continue with the EU equivlency arrangment or not.
jake lewin	Q7) Standardized import documentation would facilitate oversight in terms of visibility of trade changes and volumes. Per shipment documentation would be helpful and could be worked out but over-land borders should be considered in any system. Import certificates or other visibility, such as trade registration, for all imports would greatly improve oversight and enforcement ability.
Beth Rota	Q9 - Additional paperwork won't necessarily reduce fraud. A master system to look at volume control, similar to Europe's TRACES may be helpful.
Brenda Walker	Would be great if the national data base of certified suppliers could be searched by County.
Sam Welsch	9. More robust oversight of foreign accreditation bodies.
Synthia Morales	Certifiers from importers in USA must be registered too

Cali Alexander	Q7 Full supply chain traceability should employ the same tech systems already in place in many other industries as international industries; as an example pharmaceuticals. Blockchain;
JAIME GARCIA	8. Labels on the packages and brands on the boxes should be register in a database
Kimberly Bousquet	7 -- each party along the supply chain must be certified organic and must certify that they maintained the integrity of the organic food
James Cook	database from farm to fork using GSI/UPC/EAN information input at each point. Database can be as NOAA is taking on catch information.
Lori Kenyon	Q7. Import certificate required on all organic imports.
Chris Grigsby	Q7 - Full supply chain audit ability should fall to NOP. Very difficult for ACAs to do this on small scale. Difficulty sometimes working with other ACAs with investigations. How does ACA hold other ACA accountable in making determinations?
Jessie Jessie	Q8: Organic tariff codes should be required for all imported shipments and failing to use an organic tariff code should negate the organic status of an imported product. Avoiding usage of a HTS code could contribute to underestimating true import levels and therefore supply and demand metrics. With a limited number of organic specific import codes; the industry needs the U.S. government to make a concerted effort to increase the number of organic specific codes. These changes would encourage shippers to accurately label shipments?increasing transparency in the import market.
Andy Hupp	8 - Training CBP, APHIS and related authorities on organic requirements and set up lines of communication for them to report observed issues
Lianne Nunes	Integrity Database - More detailed information should be required, specifically for livestock/crop producers. Ex: acreage #'s, herd #'s, est. production yields.
Kyla Smith	8: certification of the entire supply chain will help
Elise George	Q9: NOP should consider streamlining trade arrangements so that verifications, documentation, and labeling are more easily understood.
Cynthia Morphet	7 - Requiring import certificates would help. While specific technologies, like BlockChain would be helpful, it is not feasible to require it, particularly with small, foreign suppliers. FSVP will also help address full traceability.
Stephen Walker	9- import certificates' logistics are way different for land transport (Mexico) than boats.

Alexis Russell	Q9 I think the USDA should consider whether it is making it harder for domestic farmers to compete on pricing if we are encouraging imported organic products
Neil Millman	Q7 Import certificates are an administrative time expense and does not enhance traceability. We're all spending too much time chasing after paper. Most importantly, import B/L's do NOT have any accommodation for organic information. So, get the current systems for shipping to accomodate organic record needs and requirements. It seems each "and" additional requirement only adds to the time and expense involved in chasing paperwork. Amend existing systems of the logistics companies to accomodate organic -- organic is the future and is not going away.
Annie Berical	7/8. The rule needs to get specific about what documents are required for imports. Requiring something like a TM-11 from the exporting party's cert agency would be helpful so that we have verification from that cert agency on the product. Additionally, making transaction certificates a more formally regulated document would also help. Standardizing TCs and requiring that they contain specific information (like certificates) would increase verification that a product.
Andy Hupp	9 - multilateral agreements
Patty Lovera	9 - include mechanism to communicate with countries US has equivalence agreement with so that NOP knows about enforcement action in those countries. These should be included in how NOP determines risk
Kris Stewart	would like to see more consistency in understanding of the rules among the auditing companies
jake lewin	q9) critical that other governments and accredited systems be able to meet the integrity database. NOP should be able to identify the number and scale of equivalent operations.
Alesia Bock	Q8 - import certificates may help, but please be consistent. It's confusing to handlers when NOP requires Import certificates vs. T-C's. Equivalency agreements are also confusing as to whether a supplier organic certificate compliant to NOP standards is enough, or if a T-C or Import certificate is still required above and beyond that. It would be great to get a policy manual or guidance document for this to educate the industry.
Sam Welsch	8 & 9. Require all operations certified under equivalency arrangements to be listed in the Integrity database.

Michael Roberson	<p>Q7: USDA NOP should adopt a similar traceability standard to that of the US Food and Drug Administration (FDA) which is currently one-up and one-down, based on regulated establishment and carrier, especially as it relates to imported organic products into the United States. The records would need to be maintained in a manner consistent with the US FDA's record keeping provisions with the FDA Bioterrorism Act. As the industry improves traceability solutions through GS1 US, Blockchain, and other solutions, the regulations should still adopt the minimum standard of one-up and one-down.</p> <p>Q8: I would support USDA considering collaboration with the US Customs and Border Patrol (CBP) to have the organic customs documents uploaded with import certificates. Recently, this practice was adopted by the US Food and Drug Administration (FDA) as it relates to the Foreign Supplier Verification Program (FSVP). It may be possible for US CBP to update their database and provide codes that indicate if an organic certificate is valid, not valid, and/or missing at the time of importation.</p>
Jessie Jessie	<p>Q7/ Q8/ Q9: Other countries operating under an equivalency agreement should be required to maintain the same information as US based operations. Additionally, they should be integrated into the Organic Integrity Database allowing the supply chain to have a one stop shop for information.</p>
Cali Alexander	<p>Q8 Equivalency certificates with other countries should be expedited.</p>
Richard Siegel	<p>Q7. We do not know who the operators are under Recognition Agreements in India, NZ and Israel, because certifiers in those countries do not report about their clients to the INTEGRITY Database. Thus there is not full supply chain traceability from farm to table.</p>
James Cook	<p>Imports continue with USDA CB certification of certification through those CBs in equivalent countries.</p>
George Kalogridis	<p>8 In overseas regions where there is very little data on organic farms / acreage / hectares etc .Domestic certifiers need to be able to trace crops back to the farm to verify the authenticity of the crops being offered to US organic companies</p>
Kyla Smith	<p>9: reporting data into OID or a portal of OID?</p>
Jessica Walden	<p>Q7: better labeling on all non-retail packaging.</p>
Stephen Walker	<p>9- changes to EU regs</p>
Dimitris Sotiropoulos	<p>9 Trade arrangements should be further supported. Since the organic market is still on the rise, more resources are needed to guarantee integrity. As long as Countries Worldwide are cooperating, control of organic products will be more efficient.</p>

meredith smith	Q8,9 - I believe there is confusion on organic equivalency programs and what information is required to call products organic in the US that are certified in other countries. There is OK information available on the web related to US-Canada equivalency programs, but there needs to be a CONCISE, easy to understand summary somewhere to make it clear to traders and others what is required. (Also suggest a list of what must-have items need to be on each certificate - goes back to Q1 related to what might be on a Federated certificate.)
Allison Burke	Agree with Jessie
Sarah Reed	9. Remove requirements for product to be processed/handled in the specific country that is part of the equivalency. If certified to NOP, considered equivalent even if processed outside US.
Chris Grigsby	Q8 - Additional requirements for any ACA certifying products grown in other countries, especially where no equivalency arrangement is in place.
Mary Hand	q7 perhaps a standardized required set of documents that must accompany materials throughout the supply chain. suppliers would be audited for proof of compliance and users would be required to deny receipt of any material without the document set
Sherine Kanagasunderam	Import Certificate is a wasted document because, the CB does not really check what's being imported. We can trace the products we purchase through purchase orders and lot numbers.
JAIME GARCIA	7. Adding to this question... FDA input with FSVP will have a lot of support to identify any information required by USDA regarding the status of the produce
Erin Heitkamp	7- Requiring federated certificates with QR codes, and acreage data submissions by certifiers to the organic integrity database, along with the requirement for transaction certificates that would also be captured in the Organic Integrity Database would allow for full traceability and facilitate mass balance reconciliation on both an individual farm and aggregate basis, as long as reciprocal programs are also required to report the data, conduct mass balance reconciliation, and issue TCs.
jake lewin	Q9) require reporting into integrity at least annually or maintaining an equivalent system.
Cali Alexander	Q9 Expedite them.
Cynthia Morphet	8 - Import certificates and being incorporated into the OID will help.

Deborah Deborah	Q9 - Future Trade - equivalency of exporting organic processor should be evaluated periodically (every 2 yrs, etc.) and subject to NOP oversight. For example, similar to FSVP. FSVP should be addressing "organic" processing and compliance within their products for any food exported to US anyway. In other words, should be covered under FSVP - may not be a need to additionally have NOP certification body oversight for these exported products.
Kate Mendenhall	Q9: Establish a system for communication with equivalency countries/regions so that if a shipment is turned away, it equivocally is turned away anywhere there is equivalency & NOP should be notified & vice a versa.
Alexis Russell	Q9 When consumers see the organic symbol, are they assuming they're getting a more local product compared to conventional? Is that something that should be addressed when it comes to certification of imported products?
Allison Burke	Current and future trade arrangements exhibit increased transparency
Kimberly Bousquet	7 -- electronic capture of all transactions involving the organic food
James Cook	Equivalency would have to adjust with the adjustmenet of this rulemaking.
Cali Alexander	FDA foreign verification prgram is full of loopholes.
Juan Guzman	Q8. Certificates can subject to falsification. En electronic database validation would be the best way to go on imports, if a importer or exporter would like to bring the product to the USA, they would need to register ahead of time and validate their organic certification via this database that can be reviewed confirmed at the point of entry into the country. This could be further developed with a Prior Notification Program/System that would allow importers to let the port of entry know that the product is coming in
Aubrey Lopatin	Q9: Equivalency arrangements are very helpful for importing organic goods. However, Equivalency arrangements that still require additional notation on certs (such as US/CA equivalency) can create as much hassle as having no equivalency to begin with
Michelle O'Brien	7 have a standardized way of compiling the information at each stage gate and to link them together for an item so that you can follow it from start to finish
jake lewin	q9) agreements should be based on demonstrated ability and track record of implementing an organic system not merely the creation of a standard or propping up an accreditor but without enforcement history.

mike crotser	Q9 - Examine expanding equivalency arrangements with other trade partners such as China.
Richard Mathews	Integrity Database - Farm name, First and Last names, Anniversary Date
Sarah Reed	7. NOP should do risk-based full supply chain audits as NOP is the only party with full authority to review a complete supply chain. Certifiers can only see one step forward and back so risks may be disguised.
Erin Heitkamp	9 - Reciprocal programs should be required to report acreage data to the OID, conduct mass balance reconciliations and issue TCs.
Annie Berical	9. One thing I've had trouble with regarding existing trade arrangements is getting verification from the certifying agencies of these countries. These agencies are not formally accredited by the USDA, so we cannot look up certified entities in the integrity DB. Often we look at an agencies website or email an agency to get confirmation of an entity's certification status, but their agency may not have a list of certified operations that is easily searchable or they may not respond to emails.
Melissa Elkins	9 - domestic product should always have priority over imported products - any trade agreements reached should not allow US farmers to lose sales opportunities.
yasmin cedamanos	q9: difficulties that cause to some operator not included in the equivalence, p.e.us trader not handling, not covered by equivalence with eu and no possibilities to certify eu for that category.
hande kemerli	Q 7 : each party have to certified - electronic (as Traces) certificates should be used.
Megan Megan	Q7: Importers are required under FSVP to maintain records of traceability. Would recommend aligning requirements with FDA & FSVP Q9: there is an issue currently with TRACES where product that is not from the U.S. that is certified organic and equivalent, which is exported to the EU, is not allowed under TRACES since it is not originating from the U.S. These types of issues should be evaluated to align systems with other foreign countries
Sam Welsch	7. Traceability requires much more detailed auditing than typically occurs during inspections. This is essential for detecting fraud.
Arturo Gonzalez	Q5- it often occurs that imported product is held at customs by USDA or FDA and many times offloaded insite, we have not knowledge of these facilities been organic handling capable.

jake lewin	Q10) Unannounced inspections are great and a clear regulatory requirements for at least 5% should be the bare minimum. both for sampling and UAI's certifiers should have to report to NOP annually on their programs, success rate, and meeting the minimum threshold.
Richard Mathews	Integrity Database - Farm name, First and Last names, Anniversary Date should be required NOT optional.
Melissa Elkins	Q9 - require ethical sourcing for imported products
Chairperson	Q 10 and Q11
Sam Welsch	10. NOP should cover the cost of unannounced inspections.
jake lewin	Q10) very little to consider. these are already done and largely integrated into the cost structure.
rebecca willows	7 once again I agree with Sam inspections need to be much more rigorous.
Cali Alexander	Q10 Cost is the same
Alesia Bock	Q10 - NOP should cover the cost of unannounced inspections
Aubrey Lopatin	Q10: NOP or the certifier should cover the costs of unannounced inspections
Angela Echols	Q10 - costs of unannounced inspections may make organic certifiers not recertify and new potential organic certifiers no longer consider getting certified.
Marcus Caswell	Q10- i love the idea of unannounced inspections. think that will go a long way to ensuring everyone is doing the right thing.
Cynthia Morphet	10 - Need to consider practicality of unannounced foreign inspections.
Andy Hupp	10 - the cost of unannounced inspections is already incorporated into certifier fee structures
Richard Siegel	Q11. Appeals take too long to be decided - currently around 1 year. When appeal is denied, and appellant requests a hearing, this adds more years to the final outcome - all this time, the operator is still certified.
jake lewin	Q11) NOP should allow correction of minor or administrative noncompliances during the adverse action process to suffice for closing the issue.
Cullen Carns-Hilliker	10. NOP should reimburse certification agencies for unannounced inspection costs.
Jerry Combs	Q-10 normal costs IF the unannounced audit is allowed to count for the regular announced audit.
Sam Welsch	10. even for announced inspections, the competition among certifiers to be "low cost" results in superficial inspections and audits.

Sarah Reed	10. Certifiers should have criteria for risk-based unannounced inspections as part of the 5%. CCOF covers the cost of unannounced inspections unless certified operation was already informed that they would pay the cost, e.g. in a settlement agreement.
Judy Baldwin	Q10 NOP should be responsible for the costs of unannounced inspections, particularly for fraud discovery of innocent parties.
Michael Roberson	Q10: I support unannounced inspections, including a 60 to 90 day window which the organic certification agency might conduct the inspection. The agency should consider an economic analysis to better understand the economic burden, if any, to the industry.
JAIME GARCIA	Q10. Unannounced inspections costs should be covered by NOP
Allison Burke	NOP should have a budget to share expense of annual unannounced inspection with grower or processor / handler.
Arturo Gonzalez	Q10 NOP should cover the cost
Stephen Walker	11 - broken settlement agreements. No further option for mediation with certifier.
Nicole Dehne	Q10 The costs of unannounced inspections should include the inspection costs themselves but also the staff time involved with preparing the unannounced inspection, evaluating the inspection report, and writing up the certification decision based on the unannounced.
James Cook	Must establish a time period to perform the announce audit in to reduce cost impact. 60 days is adequate.
hande kemerli	Q10 - NOP should cover cost of unannounced ins.
Kyla Smith	11: can corrections be accepted at the proposed stage? back and forth on this over the years
jake lewin	Q11) Mediation and settlement agreements for non-payment is counter productive and drives costs in the system unnecessarily.
julio diaz	julio diaz:who is qualified to perform an unannounced inspections
Alesia Bock	Q10 - if cost of unannounced inspections is an issue, then make the inspections based on risks -- similar to how FDA does it -- to mitigate limited inspectors - go for higher risk first.
Alexis Russell	Q10: Cost of unannounced inspections should not fall on the producers if there are no major violations found. Inspectors still need to be paid, but costs should be covered by NOP or certifier
Melinda DeNobrega	7-8: Don't believe Import certificates should be required - product arrives marked as organic and organic certificates outline specific products' equivalency due to an agreement. Supplier and buyer are audited as part of their or

Lori Kenyon	Q11: Stages and timely of appeal process i.e. hearings. We have a producer in appeal now for over a year. Also, clearly define responsibilities of certifiers and producers during appeal. i.e submittal of apps, inspections,etc.
Alvaro Martinez	Q10: Unannounced inspections should be charged because it is part of the certificatoion process in case of projects with higher risk. If a project has a higher risk and they receive an unannounced inspections, the client should pay for it.
Kate Mendenhall	Q11. Issueing a non-compliance should somehow transfer to the next certifier, and or mark that producer on a high-risk operation probationary period that would give the next certifier a headsup that closer observation and inspection is necessary.
Cali Alexander	Q11 Minor non complainces should allowed to be corrected on site and short term correction items.
Devin Dowell (WSDA)	Q10 - The issue isn't so much with cost but ensuring that unannounced inspections are implemented unilaterally by all certifiers so that certifiers who do conduct unannounced inspections--and include provisions in their fee structures to cover this cost--are not less appealing to certified operations
Jerry Combs	Q-11 As long as the NOP has clause for CB's to make it up as they go, how can you appeal that?
Alexis Randolph	Q10 would like more information about why NOP thinks 5% may not be sufficient. We plan for 5% and add on additional based on complaint investigations as needed. We currently absorb the cost and do not charge operators. May need to change that approach if number increases significantly.
Kyla Smith	11: corrections for administrative (nonpayment, submitting annual updates) especially bog down the system
Beth Rota	Q10 - Unannounced inspections increase the cost of certification to every operation because they must be incorporated into certification fees.
Neil Millman	QQ10 -- compare the costs of unannounced inspections versus the information gained from scientific lab testing. yes, there are drift issues, however... the best way to know what is in a product is to lab test. additional inspections check paperwork, which can be doctored. chemicals in soil or product are where the true story lies. lab testing is economical, too. general comment -- add someone to the committee who is operationally/ efficiency oriented -- there are ways to enhance/ increase oversight and lessen costs / time spent. this should be a priority.
Cullen Carns-Hilliker	10. Is NOP is considering codifying the current unannounced inspection guidance into the NOS?

Synthia Morales	Q10 The costs of unannounced inspections must be covered by NOP and operations (50 / 50) in cases of fraud or finding of contaminations (sometimes the origin is not responsibility of the operation)
Richard Siegel	Q11. Certifiers who issue notices of suspension or revocation should be encouraged to resolve these cases by informal mediation - or settlement negotiations.
Annie Beral	11. The proposed suspension/mediation process has become quite onerous. We have operations that at this point have incurred 2 or 3 settlement agreements, the terms of which we try to verify are being met each year. Do settlement agreement terms apply indefinitely, or should they expire at some point?
Gwendolyn Wyard	When will the recording be available?
jake lewin	Q11) NOP should further clarify and solidify the role of ACA-led informal mediation processes.
Elizabeth Figueredo	Q11 Appeals process can take an incredibly long time especially when routed to a SOP. Meanwhile, the operation in proposed adverse action can still sell product as organic and maintain their certification. I understand we have to respect due process, but there should be a maximum amount of time established to finalize a decision by the Administrator.
Kimberly Bousquet	10 -- if companies know they will face (or have to conduct) a certain number of unannounced inspections each year, they can account for that in their yearly accounting.
Synthia Morales	Q11 all clear of non compliance and appeal processes
Melissa Elkins	Q10 - it is hard to have relevant paperwork on the premises when we are being inspected for activities that happened in the prior fiscal year; it costs us money to have files moved from storage on short notice, especially since we have to have ALL of our invoices from the previous year delivered to our office, plus on-site storage of said 30+ file boxes.
Sarah Reed	11. Define "written request for mediation" more broadly as any attempt to respond, e.g. payment of overdue fees or response to original issues that led to proposed suspension.

meredith smith	Q10 - I think the proposed rule to have 5% of the annual inspections be unannounced is OK, but there are some audits (SQF or maybe it's BRC, I can't remember) requires that one audit every 3 or 5 years is unannounced, which makes sense. It also ensure that someone other than just the quality manager understand the requirements and makes sure that the processes and procedures are fully communicated. The auditor should indicate in what month they plan to come just so that vacations, etc, can be scheduled and not waste the auditors time if noone knowledgeable is available at the time of the audit. So to keep the costs of unannounced audits down, I believe a site should know in which year they will receive an unannounced audit and have some idea of what quarter or month the audit would occur in.
Alexis Randolph	Q11 is a very large questions. Could this go to the NOSB for additional public comment? For example, settlement agreements (who when why).
Dimitris Sotiropoulos	10 the cost of unannounced inspections should be incorporated in the annual fees of the CBs, since it forms part of their service towards organic operators in general. It could be that operators with "positive background - with no non-compliances" may get discounts over the years.
Andy Hupp	11 - It is extremely difficult to get a motivated bad actor out of the system. Due process is important, but the tools we have as certifiers are very, very limited.
Cali Alexander	Q10 Simple protocols for unannounced inspections should be developed for consistent entry.
Stephen Walker	11- options for removing portions of operation from certification voluntarily. For example, because of drift from a neighbor - land is out for three years, but that may not require adverse action, and subsequent reinstatement process.
Deborah Deborah	Q11 Appeals Process - there should be a clear process to get questions or discrepancies clarified. Often one certifying agent accepts a certificate for a product or acceptance of a product (sanitizer or cleaner) in an operation with removal event for example and then another certifying agent or when a processor changes certification bodies and they don't accept a certificate (product) and this is problematic. Maybe suggest setting up an askNOP similar to askFSIS where you can get feedback on a question, substance use, use, etc.

Chris Grigsby	Q10 - NOP should consider that currently unannounced inspections costs are born by the certifier, and any relief or cost sharing would be helpful. Ultimately it is shifted to the certified operations through adjusted fee schedules. Rulemaking should include parameters around scope of unannounced mix per year to represent all production scopes, not just the easiest to hit 5%.
Elizabeth Tigan	Q11: Agree with Jake about the Mediation process for payment and paperwork proposed suspensions. Too much time and money ? make the process not work the way it should, time and efforts can be better spent with real compliance work.
Beth Rota	Q11 - the appeal process can be very lengthy. It makes it hard for certifiers to evaluate continued compliance while the operation is still certified while waiting on an appeal decision
Sam Welsch	11. NOP should conduct its own investigations when receiving complaints.
Alesia Bock	Q11 - minor non-compliances for voluntary changes made by industry for label changes (which are considered "temporary label approvals" by FSIS, should not be considered "minor non-compliances" by NOP -- i.e. label runouts where there are minor ingredient line changes that do not affect consumer labeling or allergen risks, as long as it meets FDA and/or FSIS labeling.
Chris Fanta	Q11: Clarify settlement agreements and their intention to the public. Don't force settlement agreements in adverse actions when it is something as simple as fees or paperwork updates that could be corrected.
Nicole Dehne	Q11 The Agricultural Mediation Program should cover costs for mediation. Certifiers could avoid appeals by using the mediation process but currently certifiers charge farmers to mediate while the appeals process is free. NOP should make sure that mediation for organic certification is covered under the Agricultural Mediation Program. This would save the USDA money.
Devin Dowell (WSDA)	Q11 - Maybe slightly off topic, but I would like clarification in the rule of when to pursue a Suspension instead of a Revocation
Cali Alexander	Q10 "Right of Entry" authority should be legally researched.
Nicole Dehne	Q11 https://www.agmediation.org/
Juan Guzman	Q10. The process of certifying an entity or growing practices as Organic has a cost, CCOF for example does based on revenue, others have a fixed rate. A certain amount of this cost should be passed from the certifying bodies to the USDA, to covers some of the costs of unannounced inspections and other operating costs.

Kate Mendenhall	Q11. How do you plan to handle very large clients & certifiers? Perhaps certifiers that handle client payments above a certain threshold must have a third-party certifier randomly identified by NOP conduct part of the review or provide a surprise inspection. The threat of losing a very large paying client to non-compliance could create bias and inconsistency.
jake lewin	Q11) Rule should allow for correction of noncompliances during proposed adverse action. NOP should revise current reading of text of regulation.
Beth Rota	Q11 agree that settlement agreements should not be needed for administrative noncompliances
Sam Welsch	12. Complaint investigation was not listed as an item for discussion, but too often complaints are dismissed too easily.
Andy Hupp	11 - ACAs are required to use the adverse action process unnecessarily for administrative issues, taking up valuable resources that could be used for investigations and other compliance work that has a greater impact on organic integrity.
marissa pyle	i agree with jake and andy
Nicole Dehne	Q11 Producers should be able to resolve proposed suspensions vs having to mediate and go into a settlement agreement.
Lori Kenyon	Q10: Investigating complaints can be a costly expense to a certifier. Could federal funding support some cost due to ensuring integrity
Dimitris Sotiropoulos	11 non-compliances and appeals should not be left to be interpreted by CBs. NOP should at least categorize according to the severity and leave room to the CBs about the sanctions imposed. The frame should be unified horizontally for all CBs.
Alexis Randolph	Q11 agree with Jake Lewin that NOP current reading of rule to prevent accepting noncompliance responses during adverse action is an interpretation that could be revisited
Jerry Combs	Q-11 We were made to switch from Quat Strips to Nitrogen strips and the next year told to switch back. Eliminate the make it up as you go clause.
jake lewin	Q10) UAs strengthen the system and generate value. cost of inspections themselves is pretty minor overall.
Kimberly Bousquet	Other item: certifiers should have more accountability toward the AMS; not just toward their customers
Chris Grigsby	Q11 - appeals are too time consuming and give the operation way too much time to continue as certified. Perhaps consider differentiating between administrative noncompliances and actual production/compliance related issues.
Kyla Smith	agree with Lori (NOFA-NY) RE: cost for complaint unannounced

Cullen Carns-Hilliker	10. Support for rulemaking for unannounced inspections, similar to the current NOP guidance.
Andy Hupp	Agree with Cullen re: adding unannounced inspections to the rule
Alexis Russell	12. It would be helpful for certificates to be attached to the integrity database so I don't have to call every supplier I have on my list to get updated certificates. If it's public information then why not have certifiers upload the actual certificate to the database as well?
Erin Heitkamp	NOP's enforcement authority should include the retroactive recall of organic labeled products that have been proven to not be in compliance with the NOP.
Stephen Walker	11- mediation might not just occur in one "session," but can be a series of communications in varied forums.
Sarah Reed	11. Per Penalty Matrix, required Combined Notice of Noncompliance and proposed suspension for "accidental or otherwise un-willful application of a prohibited substance to land" results in adverse action process when operation simply needs/wants to surrender certification of the land. This is very burdensome for certifiers.
Tina Sohal	unannounced audits for manufacturers too
jake lewin	Really nice of NOP to give the entire public an opportunity to engage and share thinking. Strongly encourage NOP and department to continue to make rules and moving the system forward to ensure the massive value creation that comes from organic production, well in excess of theoretical "economic impact"
Erin Heitkamp	10 - Pipeline Foods supports unannounced inspections.
Arturo Gonzalez	Totally agree with Alexis
Neil Millman	General comment: Fertilizer-gate -- look at each new regulation with an eye towards this question: How would this new rule have identified / prevented fertilizergate? if it wouldn't have prevented / identified it... it's not worthwhile.
Lori Kenyon	provide questions prior to town hall so can be more prepared.
meredith smith	I really appreciate you requested feedback this early in the process - thank you!!!!
Stephen Walker	This was all pretty shoot from the hip and pretty quick. But, appreciated, for sure.
Kyla Smith	i really appreciate the early engagement. questions in advance would be really helpful
Cynthia Morphet	Appreciate the opportunity to provide comments/feedback at this stage of the process.
Kimberly Bousquet	Thank you for this town hall opportunity. I'm subscribed to AMS updates, so found it there. I appreciated being able to see everybody else's response.

Kimberly Luce	Nice to feel more like part of the process
Aubrey Lopatin	Agree with Lori -- provide questions in advance to be more prepared
Allison Burke	Find Town Hall - informed by our Organic Certifier
Jackie DeMinter	Thank you for the engagement in the process early!
Nicole Dehne	Let us know what the topics will be ahead of time so we can think about the issues in advance for better comments.
Amalie Lipstreu	Appreciate your reaching out for advance input for the rulemaking process-thank you! Agree- with Kyla that questions in advance would be helpful
Gwendolyn Wyard	This was extremely helpful and we support future Town Hall opportunities. Early input on a proposed rule is greatly appreciated. Nice use of technology. Thank you, more please!
Beth Unger	I appreciate getting a sense of your direction. The chat box went so fast that it was very difficult to get a sense of the input. We look forward to seeing the posting to get a better sense. Thank you for setting this up.
Jerry Combs	This is a great webinar and I appreciate your time and efforts in informing the Organic Community. Great Job))
Kate Mendenhall	Really appreciate the opportunity to participate and provide feedback. Agree a list of questions ahead of time would be helpful.
Rebekah Finn	It would have been nice to have the questions in advance so we had more time to gather thoughts and ideas in more time than 5 minutes
George Kalogridis	Share questions prior to meeting
Alesia Bock	I found this Town Hall via email this morning. Not sure I would have paid much attention. But I'm happy I found it and was able to participate. Next time, provide multiple reminders?
veronica reyes	Thank you for information
Synthia Morales	We are conform with this webinar, appreciate the oportunity to be part of the process
Richard Siegel	Very pleased with Town Hall. Very efficient way to receive feedback from large group of people. Look forward to reading all the feedback on line.
Neil Millman	How did you find this town hall? excellent. it gave folks voice. thank you!
Chris Fanta	Thanks for allowing the recording to be published, as well.
Juan Guzman	Q11. All processes must have a specified standard set deadline, in other words no more than 30 days, vs trying to complete the process based on the workload of the agency,
mike crotser	What might we do differently next time? Why the new process instead of first funneling through the normal NOSB process?

Chris Grigsby	Would have been good to get the questions and topics in advance for more prepared answers.
Michelle O'Brien	Would be good to provide questions a head of time to be able to run by others to provide feedback if they are unable to attend a town hall
Emily Brown Rosen	how you did: Good idea to give this opportunity, will help jumpstart community thinking at an earlier stage of rulemaking. Thanks.
Cali Alexander	Have many of these along the process!
Cynthia Morphet	Agree that seeing the questions in advance would allow for more thoughtful, inclusive feedback
Angela Echols	Agree that list of questions ahead of time would help us be more prepared. Having more background on current regulations compared to how they are being proposed to change.
Cindy Elder	The opportunity to provide comments so early is appreciated! It would be helpful to know the topics/questions in advance, so certifiers can be prepared by discussing with the various staff involved.
Elizabeth Tigan	We would like to be better prepared in the future.
Andy Hupp	Thanks for providing this opportunity for early feedback in addition to the public comment period where we have more time to prepare considered content.
Lianne Nunes	Enjoyed and appreciated this town hall opportunity prior to rule making. Would like to be given questions prior to the webinar so answers can be more prepared.
JAIME GARCIA	Sound was coming and going, probably need a better platform to have these webinars.
Dimitris Sotiropoulos	it was a very positive and interactive experience. Thank you for the opportunity
Britt Britt	Thanks for hosting this. It would be useful to be able to access the comments as a pdf, rather than just via watching a recording of the webinar. They move past pretty quickly as they are coming in. Agree would be great to get questions ahead too.
Nicole Dehne	This was great. Thanks for attempting to get our input earlier.
Alexis Russell	Giving some background information ahead of time so we can make more informed comments would be very helpful
Bill Wolf	A healthy process, thank you. It would have been helpful if questions were posed in advance.
Randy krieg	Send out questions in advance so answers are more complete
Alesia Bock	I agree with questions ahead of time. that would be helpful.
Aubrey Lopatin	Thank you for providing this opportunity to be included in the process without having to travel to a fall/spring meeting

Madison Kempner	Appreciate the additional opportunity to provide feedback, and agree with others about circulating questions in advance.
Erin Heitkamp	Thank you for sharing information on the regulatory changes NOP is currently considering and the opportunity to provide feedback. It would be of significant interest to see a summary of all the feedback you receive during the session. Opportunities to continue to engage in this format in the future would be appreciated.
James Cook	Thank you
Melinda DeNobrega	Agree with feedback that it would be nice to have questions ahead of time
Lianne Nunes	Great Idea. Hope the NOP continues to do this with future rule making
Michael Menes	Would like to see the questions prior to the meeting. very fast process.
Richard Mathews	Q 10 - WODPA supports unannounced inspections. these inspections should be factored into the certifier's fee structure.
Kimberly Bousquet	Agreed with advanced notice of topics! Thank you presenters.
Jessie Jessie	We appreciate the opportunity to add our feedback and input to these questions around rule making.
Elise George	Helpful and interesting format, thank you.
JAIME GARCIA	The limited time to answer questions since the presentation continues makes it to be in a rush.
Sarah Reed	Really great opportunity to provide feedback, thank you. Suggestion to improve - no talking during the "answer the question" moment as it is difficult to listen and type. Also hard to read others responses especially when they are long, unclear how visible they will be in the recording.
Jackie DeMinter	We appreciate knowing the direction NOP is heading!
Gwendolyn Wyard	Agree, a summary of the input would be greatly appreciated.
Chris Grigsby	Any chance to push the OLPP forward again? Desperately needed!
Cullen Carns-Hilliker	I agree with Jackie
George Kalogridis	Thank you for reaching out to the greater organic community
Lynn Johansen	narrower focus might be helpful to fine-tune the comments. Great though to be included early.
Richard Bertrand	Thank you
Alexis Russell	Agree with Sarah! It was hard to reason out my response while everyone was still talking
Juan Guzman	Townhall was great, it would be great if we could receive the power point a couple of days ahead, so the contributions can be further researched and validated
Sarah Reed	Agreed that more time for each question would be helpful.

Alesia Bock	I wish your team luck in getting through all these awesome responses :)
Synthia Morales	A summary is needed. Thank you
hande kemerli	thNK YOU
jake lewin	q-10) suggest NOP consider the allowance for certifiers to also implement focused inspections instead of annuals so they can do better more nuanced work on biodiversity, soil conservation, pasture etc.
Richard Mathews	Q When will the slides from this webinar be available.
Dimitris Sotiropoulos	It would be very helpful if you could "automatically" group the answers under the Questions somehow :-) (connect it to the Question number maybe?)
Genevieve Albers	Thank you for this opportunity. Agree with comments regarding more advance notice of questions.
Ali Hudson	Please provide the comments/feedback in a format that is easier to review than just the recording. Some comments were bumped off the chat too quickly. Thank you for the opportunity to provide feedback.
Arturo Gonzalez	Thank you for the info, this should happen more often, its a great way to share and communicate information.
Julie Paillat	thank-you. very smooth and got through a LOT of info. I am not able to feedback at this time but it gave me good insight which can be used as follow up, and for the formal opportunity.
Judy Baldwin	Topics could include from start to finish the certification process, and receiving your certification in a timely manner.
Rebekah Ritson	Concur - especially with such a limited time to provide feedback, having the questions in advance would allow participants to provide well formulated and considered responses, which will ultimately be more valuable to the rulemaking process.
Angela Echols	This was a nice way to feel open to providing feedback in a more informal setting. I feel you will get more comments this way then formally submitting.
Randy krieg	This has been a very good forum.
Melissa Elkins	There is way too much time between retailer audits and feedback on the audit and status of certification - we were audited last in March 2018 and were told to have all of our 2016 invoices on site; when we were audited, they only asked for invoices from FY 2017, which ended up costing us money and time getting all of our 2016 files on site that ended up never being needed. We still haven't gotten any feedback on our audit and it's been four months. There needs to be a much better system and communication protocol on retail audits.
Rebekah Ritson	whoops, sorry, wrong window!

Cali Alexander	Would love copy of everyones input!
JAIME GARCIA	but definitely need more webinars and more information flowing through. Thanks for hosting this one!
Marisol Oviedo	Jenny, when will this webinar info be available on the NOB website?
jake lewin	Q10) cont'd. this could result in a decrease or maintenance of existing costs with better compliance outcomes in the most important areas of the rule.
Rebecca Frey	More of these webinars should be done throughout the rule-making process,.
Juan Guzman	A summary of the meeting and the answers would be great.
Juan Guzman	Thank you for doing this and for all the participants.
Arturo Gonzalez	Is it possible to send us a link by mail to go over the entire chat?
Daniel Burkard	A transcript of the Q&A box would be helpful. Many of the answers vanished before being fully read.
Michael Menes	Will there be a response from the NOP on the comments?
Dimitris Sotiropoulos	Could we get all the comments in a txt file or word document?
Rudy Amador	Great first virtual townhall. Consider keeping chat open for X time after the webinar so that participants have more time to answer questions fully.
Marty Mesh	Look forward to opportunity to give input on these questions with ability to type slower
jake lewin	q10) NOP should ensure the authority to require certain types or approaches to unannounced inspections so it is not solely up to ACAs, or at least to give NOP authority to require as directed.
julio diaz	thanks for the info
Mark Kastel	45 minutes of organic stakeholders, shooting from the hip, on questions that were withheld prior to this session, does not remotely compare to the thoughtful engagement between industry participants and the NOSB which has proceeded rulemaking in the past.
Sam Welsch	what is email to submit comment later?
Melissa Elkins	Thanks for doing this - questions ahead of time would be great, but glad for the opportunity to submit our opinion.
Alexis Randolph	Feedback - Great to have the opportunity to provide public comments direct to NOP. Many of these topics have been brought up during NOSB so not a surprise. However, some are new (e.g. changing adverse action process) which may require additional opportunity for feedback before going to rule making. To not risk the more vetted items from moving forward, I would encourage NOP consider keeping some items out of rule making until more public comment is received. Thanks you.

Juan Guzman	Jenn, could you go back to the first slide
Jessica Walden	thank you!
Kelly Monaghan	Thanks very much
Richard Mathews	I agree with Marty Mesh regarding having time to consider the questions and type slower.
Juan Guzman	That shows your contact info as well as the other presenter?
Gwendolyn Wyard	We appreciate that many of the questions are the same questions that NOSB asked in its spring 2018 Discussion Document. This provides another opportunity and reaches a larger audience.
Sarah Reed	Consider allowing folks to send additional feedback after the presentation for those whose brains need a little more time to consider a thoughtful response. We acknowledge that there will provide draft comment.
jake lewin	I felt prepared for this because of reading the documents NOP linked to in the invitation and the previous newsletters. none of the topic areas were a surprise.
Chairperson	Thanks all for your comments! We will close chat in 1 min. Last call for feedback.
Aubrey Lopatin	Thank you again for providing this new format. Really helpful for smaller organizations. Hopefully, it reaches a broader audience and more stakeholders!
Chairperson	We are closing the line now - thanks! END

Strengthening Organic Enforcement **Town Hall Participant List**, July 17, 2018
USDA Agricultural Marketing Service, National Organic Program

Last Name, First Name

Abbott, Kelly	Brown, Beverly	Criss, Jill
Adam, Warthesen	Brown Rosen, Emily	Crotser, Mike
Adriainie, Adriainie	Browner, Paul	Cruse, Jennifer
Aerin, Aerin	Brubaker, Shannon	Dag, Dag
Afton, Drew	Buhler, Ashley	Dagoberto, Marty
Agostini, Thais	Burkard, Daniel	Dai, Zi Ran
Albers, Genevieve	Burke, Allison	Dale, Kelli
Alexander, Cali	Burns, Susan	David, David
Amador, Rudy	C, Jay	Davidson, Amy
Anderson, Alice	Capehart, Mary	Davis, Graham
Anderson, Glenn	Carlton, Kelly	Davis, Katie
Anegon, Angela	Carmody, Daniela	De Pedis, Laura
Angel, Tracey	Carns-Hilliker, Cullen	Debates, Megan
Anne, Anne	Carr, Jamie	Deborah, Deborah
Armbrust, Heidi	Carrillo, Patricia	Dehne, Nicole
Armstrong, Andres	Casto, Lynnessa	Delauter, Ashley
Atkinson, Gisele	Caswell, Marcus	Deminter,
Avila, Joan	Cedamanos, Yasmin	Denobrega, Melinda
Bailey, Shane	Cerci, Tugce	Dermond, Allison
Baker, Westley	Chairperson,	Diandra, Diandra
Baldwin, Judy	Chansilp, Mike	Diaz, Julio
Ballard, Tammie	Charette, Jamie	Dick, Mira
Bascom, Crystal	Charles, Melissa	Dill, Mike
Bauer, Brittny	Chesnut, Dana	Dominique, Dominique
Beausoleil, Km	Clark, Jared	Donnel, Donnel
Becker, Elizabeth	Clark, Megan	Doster, Elizabeth
Benna, Sharon	Claypool, Rebecca	Dowell (WsdA), Devin
Berical, Annie	Clemente, Cesarina	Durand, Wendy
Berkebile, Jen	Cobianchi, Gina	Durkin, David L.
Bertalmio, Genny	Collier, Ellis	Echols, Angela
Bertrand, Marie-Eve	Combs, Jerry	Edwards, Suzette
Bertrand, Richard	Coody, Lynn	Einstein-Curtis, Aerin
Bewersdorff, Daniel	Cook, James	Elder, Cindy
Black, Jim	Cook, Justine	Elkins, Melissa
Bob, Bob	Corbett, Michael	Emirler Ã–Zsan, Ã–Zlem
Bock, Alesia	Cori, Cori	Engle, Elvin
Botto (Oia), Ariel	Coulson, Michael	Etile, Maxime
Bousquet, Kimberly	Courtney, Cheri	Eustice, Amanda
Britt, Britt	Cowell, Thomas	Fanta, Chris

Farias, Brian
Farnsworth, A Stephen
Fernandez, Leslie
Ferris, William
Fields, Daniel
Fierst, Megan
Figueredo, Elizabeth
Finn, Rebekah
Fishback, Levi
Forbes, Stephen
Fowler-Riggs, Mayze
Frances, Valeria
Frankel, Lee
French, Karin
French, Shelby
Frey, Rebecca
Gagnon, Daniel
Gaitan, Ann
Gandolfo, Jana
Ganske, Heather
Garcia, Jaime
Garcia, Katriana
Gasinski, Aimee
Gehman, Rebecca
George, Elise
Gieseke, Beth
Gina, Gina
Godfrey, Evan
Gonzalez, Arturo
Gottmann, Anna Maria
Gracie, Josianne
Grasseschi, Christina
Greene, Kim
Griess, Roger
Grigsby, Chris
Guevara, Maki
Guntin, Ignacio
Guzman, Juan
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Haddouche, Lila
Haines, Julia
Hake, Paige
Halsted, Susan

Hammergren, Chris
Hand, Mary
Hanks, Nathan
Harrington, Tawana
Harris, Chris
Harsh, Cameron
Heitkamp, Erin
Herbruck, Brennen
Hernandez, Danny
Hourigan, Ann Marie
Hubbart, Sarah
Hudson, Ali
Hudson, Ian
Hupp, Andy
Iglesias, Julio
Ingrid, Ingrid
Jacob, Lindsay
Jasmin, Jasmin
Jeff, Jeff
Jessica, Jessica
Jessica, Jessica
Jessie, Jessie
Jockel, Sam
Johansen, Lynn
Johnson, Brad
Johnson, Daniel
Jordan, Brittany
Kaja, Bhagya
Kalogridis, George
Kanagasunderam, Sherine
Kane, Patricia
Karin, Marni
Kastel, Mark
Katherine, Katherine
Kelly, Kelly
Kemerli, Hande
Kempner, Madison
Kenworthy, Jody
Kenyon, Lori
Kern, Glenn
Kidwell, Christopher
Kieft, Janis
Kintz, Soline

Kissinger, Heath
Kline, Dusty
Koory, Ryan
Krieg, Randy
Kuljian, Nina
Kurple, C
Lacombe, Calem
Landa, Pedro
Landa, Sofia
Lanspa, Rachel
Lee, Danny
Lee, Juny
Lee, Megan
Lenczyk, Chelsey
Leticia, Leticia
Letis, Letis
Lewin, Jake
Lewis, Nate
Lichtner, Sarah
Lichty, Martin
Linder, Janet
Lindsay, Lindsay
Lindsey, Arianne
Lipstreu, Amalie
Lockman, Dave
Lopatin, Aubrey
Lopez, Irazu
Lopez, Luis
Love, Lucy
Lovera, Patty
Lucas, Kierra
Luce, Kimberly
Lundquist, Erica
Lydeen, Allison
Macias, Allison
Mack, Alyssa
Magallan, Daniel
Marenzi, Maria Ines
Markowski, Sarah
Marner, Paul
Martin, Andy
Martin, J
Martin, Mason

Martin, Sandia
Martinez, Alvaro
Mason, Jody
Mathews, Richard
Matthieu, Carri
Max, Max
Mayer, Yvonne
Mazurets, Natalie
Mcclain, Fatima
Mccormack, Amy
Mcdonald, Megan
Mcelroy, Bridget
Mcgovern, Dan
Mcguigan, Brian
Meadow, Scott
Megan, Fierst
Megan, Megan
Melapie, Martina
Menachem, Menachem
Mendenhall, Kate
Menes, Michael
Mesh, Marty
Meyer, Melody
Michel, Manuel
Michelson, Russell
Miles, Miles
Millman, Neil
Mirenda, Johanna
Monaghan, Kelly
Monteiro, Sophie
Morales, Synthia
Morphet, Cynthia
Morrell, Melody
Morrison, Sarah
Mudge, Courtney
Muley, Medha
Mulhall, Brian
Murga, Josã©
Nagel, Kara
Nell, Peter
Neufeld, Jacob
Newman, Alice
Noland, Henry

Nunes, Lianne
Nurse, Sandy
O'Brien, Colleen
O'Brien, Michelle
Ordoñ±ez, Clara
Oviedo, Marisol
Paciello, Stefania
Paillat, Julie
Parker, Courtney
Patel, Miraj
Paulsen, Wendy
Pedro, Pedro
Penn, Daniel
Pexton, Fiona
Phil, Phil
Piper, Colette
Pivonka, Lydia
Platt, Felicia
Pletcher, Cydnee
Pohle, Kimberly
Pope, Lauren
Prieto, Ricardo
Propson, Leona
Pudwill, Rhonda
Puig, Feliciana
Puruleski, Bob
Pyle, Marissa
Rabago, Rebeca
Randolph, Alexis
Reed, Sarah
Reyes, Veronica
Richards, Brandon
Richart, Sherri
Richer, Leonard
Ritson, Rebekah
Roberson, Michael
Robinson, Jennifer
Rodriguez, Pamela
Rokala, Mark
Romero, Eddy
Rosado, Robert
Ross, Anne
Rota, Beth

Russell, Alexis
Sachnoff, Lee
Salhab, Monique
Sally, Sally
Santaliz-Rogers, Gianfranco
Santucci, Ernest
Sarah, Sarah
Sartori, Paula
Sattelberg, Jim
Schaefer-Joel, Sam
Schmale, Val
Schockman, Paul
Scholtus, Lennart
Schortzmann, Brittney
Seggerman, Ingrid
Semper, Annette
Shattuck, Sharon
Sherri, Sherri
Shuler, Jennifer
Shurney, Denise
Siegel, Richard
Siemers, Joyce
Simsic, Derek
Siple, Susan
Skidgel, Skidgel
Small, Debra
Smith, Andrea
Smith, Kyla
Smith, Meredith
Smith, Terry
Smith, Thomas
Snyder, Jodi
Sohal, Tina
Sotiropoulos, Dimitris
Spycher, Bryce
Stewart, Caleb
Stewart, Kris
Stewart, Susan
Stolpestad, John
Swartwood, Stacy
Tajc, Mary Beth
Tanner, Ron
Tatro, Gordon

Tester, Wanda
Thomas, Adriainie
Tigan, Elizabeth
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Tram, Phan
Tripp, Tessa
Troetschler, Cynthia
Truong, Kim
Tsang, Nancy
Twombly, Jo
Unger, Beth
Vasquez, Justina
Velazquez, Emily
Ventrella, Matthew
Von, Jennifer
Voss, John
Vulin, Ashley
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Wagner, Julie
Walden, Jessica
Walker, Brenda
Walker, Stephen
Wang, Charlene
Ward, Ellery
Warner, Karlin
Wasteneys, Carol
Watkins, Cindy
Watkins, Patricia
Waxman, Addie
Weida, Chad
Wert, Cody
West, Carrie
Westlake, Sarah
Westphal, Janin
Wheeler, Bonnie
Whitcher, Jason

Wilburn, Tammie
Wilcox, Brynne
Wilder, Karen
Willard, Anne
Willows, Rebecca
Wills, Maury Wills
Wilson, Gibbs
Winters, Monica
Withey, Katherine
Wojahn, Terri
Wolf, Bill
Wraspir, Darice
Wyard, Gwendolyn
Yang, Roert
Yokote, Yutaka
Youngblood, Abby
Zacharisen, Joni
Zimmer, Gretchen