



NOP Accreditation for Organic Certification Agencies On-Site Audit Checklist

- Name of Company: _____ Date: _____

- Location: _____ Audit Identifier: _____

- Contact Name: _____ Title: _____

- Phone #: _____ Email: _____

- Types of Clients and/or Products Certified:
 - Crops
 - Wild crops
 - Livestock
 - Processors/handlers
 - Other: _____

- Auditors:
 - Team Leader
 - Second Auditor
 - Other (identify role): _____

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LABELS, LABELING, AND MARKET INFORMATION – SUBPART D

Labels verification (205.300-205.311)

- Verify procedure to confirm labels are in accordance with **Subpart D**
- Are copies of labels used on organic products submitted with the application? If not, how are they verified by the certifying agent?
- Are labels verified during on-site inspections?
- Does the certifying agent have their own seal? If so, verify its use and that it is not mandatory **[205.501(b)(1)(2)]**
- Is the USDA seal used? If so, verify use and that it is not mandatory **(205.311)**

CERTIFICATION – SUBPART E

Application for certification (205.401)

- Are applications submitted by persons seeking certification?
- Does the application contain the required information?
 - Organic production or handling system plan that contains as applicable:
 - Land requirements **(205.202)**
 - Soil fertility and crop nutrient management practice standard **(205.203)**
 - Seeds and planting stock practice standard **(205.204)**
 - Crop rotation practice standard **(205.205)**
 - Crop pest, weed, and disease management practice standard **(205.206)**
 - Wild crop harvesting practice standard **(205.207)**
 - Origin of livestock **(205.236)**
 - Livestock feed **(205.237)**
 - Livestock health care practice standard **(205.238)**
 - Livestock living conditions **(205.239)**
 - Organic handling requirements **(205.270)**
 - Facility pest management practice standard **(205.271)**
 - Commingling and contact with prohibited substance prevention practice standard **(205.272)**
 - Temporary variances **(205.290)**



- Applicant information including:
 - Name of person completing the application
 - Applicant's business name
 - Address
 - Telephone number
 - If a corporation: name, address, and telephone number of person authorized to act on the applicant's behalf
 - Name (s) of organic certifying agents of previous applications , year, **outcome**, and when available any notification of non-compliance or denial of certification including corrective actions
 - Other information as applicable

- Does the organic production/handling plan reflect only the requirements of NOP with no additional requirements?

Review of application (205.402)

- Upon acceptance of application does the certifying agent:
 - Review application for completeness

 - Determine whether applicant appears to comply

 - Verify that applicants that have previously applied to other certifying agents and received a denial or notice of non-compliance has submitted the supporting documentation of corrections

 - Schedule an on-site inspection

- Does the certifying agent within a reasonable time: review the application materials, communicate the findings and provide the applicant a copy of the on-site inspection report and any test results for samples taken

- Is there a procedure for withdrawal of applications? Is it followed?



On-site Inspections (205.403)

- Verify on-site inspection procedures

- Are Inspections scheduled in a reasonable time, and when a representative of operation is available [(403)(b)(1)(2)] ?

- Are inspections performed initially and annually thereafter?

- How is the inspector selected?

- Is the inspector provided necessary materials to conduct the inspection? Previous inspection report? [205.501(a)(18)]?

- Are inspections conducted per 205.403 and does the inspector verify information as required in [205.403(c)]? Including:
 - Compliance to the NOP Rule (as applicable)
 - Land requirements (205.202)
 - Soil fertility and crop nutrient management practice standard (205.203)
 - Seeds and planting stock practice standard (205.204)
 - Crop rotation practice standard (205.205)
 - Crop pest, weed, and disease management practice standard (205.206)
 - Wild crop harvesting practice standard (205.207)
 - Origin of livestock (205.236)
 - Livestock feed (205.237)
 - Livestock health care practice standard (205.238)
 - Livestock living conditions (205.239)
 - Organic handling requirements (205.270)
 - Facility pest management practice standard (205.271)
 - Commingling and contact with prohibited substance prevention practice standard (205.272)
 - Temporary variances (205.290)

- Information in the Handling or Production System Plan accurately reflects the practices used by the applicant for certification

- That prohibited substances have not been and are not being applied to the operation



- How is the information verified?

- Is sampling conducted to verify NOP requirements **(205.670)**?
 - If so, does certifying agent pay for the tests **(205.670b)**?

- Verify sampling procedures, chain of control etc. What is sampled and why? Are materials used compared to the National List?

- Verify procedure for performing and verifying additional/unannounced inspections **[(403(a)(2)(i-iii)]**

- Is exit interview conducted with an authorized representative of the operation?

- Does the inspector provide the applicant with a receipt for any samples taken with no charge to the applicant?

Granting certification (205.404)

- Verify the review process **[205.404(a)]** Including:
 - Reviewing materials and inspection report within a reasonable time after the on-site inspection

 - Certification may include requirements for correction of minor non-compliances within a specified period

- Does certifying issue a certificate of organic operation that specifies:
 - Name and address of the certified operation

 - Effective date of certification **(Note: This is the date the operation is first certified to the NOP, which remains on the certificate even if updated)**

 - Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation

 - Name, address, and telephone number of the certifying agent



- Once certified, does certification continue in effect until surrendered by the organic operation or suspended or revoked by the certifying agent, State Organic Program's governing State Official, or the Administrator? (**Note: Certificate can't contain, imply or refer to an expiration date**)
- Do inspection reports and the granting of certification documents reflect only the requirements of the NOP? (Note: Additional requirements from the NOP Standards are not allowed) If there are additional requirements, has an operation been denied certification to the NOP due to these requirements?

Denial of certification (205.405)

- Does the certifying agent provide a written notification of non-compliance to an operation that is not able to comply or is not in compliance?
- Does the notice of non-compliance provide:
 - A description of each non-compliance
 - The facts upon which the notification of non-compliance is based
 - The date by which the applicant must rebut or correct each non-compliance and submit supporting documentation
- After issuance of notification of the non-compliance, does the certifying agent:
 - Evaluate the applicant's submitted corrective actions, supporting documentation, rebuttal and conduct an on-site inspection if necessary
 - Issue an approval of certification if rebuttal or corrective actions are sufficient
 - Issue a written notice of denial when the rebuttal or corrective actions are insufficient or when the applicant fails to respond to the notification of non-compliance
- Does the notice of denial state:
 - Reason for denial
 - Applicant's right to reapply for certification per 205.401 & 205.405(e), request mediation, or file an appeal



Continuation of certification (205.406)

- Does the certifying agent require its applicants to annually:
 - Pay certification fees
 - Submit updated organic production /handling plans with corrections, additions, or deletions from the previous year
 - Update on correction of minor non-compliances
 - Other information determined by the certifying agent

- Does the certifying agent conduct an on-site inspection within a reasonable time after receiving the required annual information

- Does the certifying agent issue a written notification of non-compliance (205.662) if the on-site inspection and review of documents determine that the certified operation is not complying with the NOP Rule?

- Does the certifying agent issue updated certificates if any information on the certificate has changed [205.406(d)]? **(Note: the effective date of certification and the updated certificate date must be included on the certificate)**

ACCREDITATION OF CERTIFYING AGENTS – SUBPART F

General Requirements for accreditation (205.501)

Personnel [205.501(a)(1-6)]

- Verify education, training and expertise of employees is adequate to implement the Organic Certification Program
 - Resumes
 - Position descriptions
 - Training records
 - Employee contracts

- Is the number of employees adequate for the program [205.501(a)(4)]?

- Annual performance evaluations [205.501(a)(6)]

- Verify the procedure for performance evaluation of employees.



Procedures and Records [205.501(a)(7-21)]

- Verify the procedure and records for annual program review [205.501(a)(7)]
 - Are adjustments to the operation implemented in response to performance evaluations and program review

- Is sufficient information provided to persons seeking certification [205.501 (a)(8)] ?
 - NOP Final Rule –Standards/National List (verbatim)

 - Updates

 - Other information

- Verify confidentiality procedures -records as applicable [205.501(a)(10)]

- Verify conflict of interest procedures [205.501(a)(11-12)]
 - For responsibly connected parties- organizational structure (i)

 - For persons with commercial interest (ii)

 - Consulting not provided (iv)

 - Check for Annual Conflict of Interest Disclosure Reports (v)

 - Is decision to certify an operation made by a person different from the document review or on-site inspection? (vi)

- Accept certification decisions made by other USDA accredited certifying agents [205.501(a)(13)]

- Is notice of denial, suspension, etc. and applicant list submitted to Administrator on January 2 of each year [205.501(a)(15)] ?

- Are applicants charged only fees and charges that are filed with Administrator [205.501(a)(16)] ?

- Is inspector provided with previous inspection report prior to the inspection [205.501(a)(18)] ?
 - Is inspector notified of decision regarding certification and any requirements for the correction of minor non-compliances?



Annual report, recordkeeping, and renewal of accreditation

- Is there a procedure in place for submitting the annual report to the Administrator [205.510 (a)] ?

- Verify that the procedure for record maintenance complies with [205.510(b)]:
 - Records obtained from applicants for certification and certified operations = 5 yrs or more
 - Records created by certifying agent regarding applicants for certification and certified operations = 10 yrs or more
 - Records created or received by the certifying agent pursuant to accreditation requirements= 5 yrs or more

- Are client records maintained as required in [205.400(d)]?

- Are all records available for review [205.400(d), 205.501(a)(9)] ?

ADMINISTRATIVE – SUBPART G

Fees and other charges for certification (205.642)

- Are applicants charged only fees and charges that are filed with Administrator [205.501(a)(16)] ?

- Are the fees reasonable?

- Are clients provided with an estimate of fees for certification and annual cost of updating certification?

- Is a fee schedule provided to clients? Are the fees charged consistent with schedule?

- Does the fee schedule explain what fee amounts are refundable and at what stage during the certification process fees become nonrefundable?

- Is the fee schedule provided by certifying agents to all persons inquiring about the application process?



Investigation of certified operations (205.661)

- Verify procedure for investigation of complaints of non-compliance concerning production and handling operations

Non-compliance procedure of certified operations (205.662)

- Does the certifying agent provide a written notification of non-compliance to a certified operation when an inspection, review, or investigation reveals any non-compliance?

- Does the notice of non-compliance provide?:
 - A description of each non-compliance
 - The facts upon which the notification of non-compliance is based
 - The date by which the certified operation must rebut or correct each non-compliance and submit supporting documentation

Resolution:

- Does the certifying agent send the certified operation a written notification of non-compliance resolution after the certified operation demonstrates that each non-compliance is resolved?

Proposed suspension or revocation:

- When rebuttal is unsuccessful or the correction of the non-compliance is not completed in the prescribed time period, does the certifying agent send the certified operation a written notice of proposed suspension or revocation of certification of the entire operation or portion of the operation as applicable to the non-compliance?

- Does the notice of proposed suspension or revocation state?:
 - Reason for the proposed suspension or revocation
 - The proposed effective date of such suspension or revocation
 - The impact of a suspension or revocation on future eligibility for certification
 - certified operations right to request mediation per 205.663 or to file an appeal per 205.681

Willful violations

- Does the certifying agent have procedures in place addressing willful violations? Verify procedures



Mediation (205.663)

- Request in writing to certifying agent, procedures per 205.663
- Any mediation requested? If so, check records

Adverse Action Appeal Process (205.680) and Appeals (205.681)

- Any appeals? If so, verify records and procedures used

INSPECTION-OBSERVATION OF A CERTIFIED ORGANIC OPERATION

Observe the NOP inspection activities of at least one of each type of client certified by the certifying agent.

Inspection activities can be actual inspections (preferred) or demonstration inspections.

The objective of this portion of the audit is to verify the inspection procedures and policies of the certifying agent.

- Verify on-site inspection procedures
- Are Inspections scheduled in a reasonable time, and when a representative of operation is available [(403)(b)(1)(2)] ?
- Are inspections performed initially and annually thereafter
- Verify Inspector’s relationship with Certifying Agent (contracted or employee)
- Verify conflict of interest and confidentiality status of inspector
- Verify Inspectors knowledge and abilities in relation to operation being inspected.
- Did the inspector receive the appropriate documents from the certifying agent to conduct the inspection? Previous inspection report [205.501(a)(18)]?
- Does the Inspector have a copy of the NOP Standards?



- Did the certified operation receive a copy of the previous inspection report if applicable?
- Did the certified operation receive a certificate from the certifying agent?
- Does the client have a copy of the NOP Standards?
- Did the certified operation address previous non-compliances or issues as applicable?
- Did the inspector verify the corrective actions on previous non-compliances as applicable?
- Does the inspector conduct the inspection to obtain information relating only to the application of NOP Standards.
- Are inspections conducted per **205.403** and does the inspector verify information as required in **[205.403(c)]**? Including:
 - Compliance to the NOP Rule (as applicable)
 - Land requirements (**205.202**)
 - Soil fertility and crop nutrient management practice standard (**205.203**)
 - Seeds and planting stock practice standard (**205.204**)
 - Crop rotation practice standard (**205.205**)
 - Crop pest, weed, and disease management practice standard (**205.206**)
 - Wild crop harvesting practice standard (**205.207**)
 - Origin of livestock (**205.236**)
 - Livestock feed (**205.237**)
 - Livestock health care practice standard (**205.238**)
 - Livestock living conditions (**205.239**)
 - Organic handling requirements (**205.270**)
 - Facility pest management practice standard (**205.271**)
 - Commingling and contact with prohibited substance prevention practice standard (**205.272**)
 - Temporary variances (**205.290**)
 - National List of Allowed and Prohibited Substances (**205.600-205.606**) - verify use of National List
 - Information in the Handling or Production System Plan accurately reflects the practices used by the applicant for certification
 - That prohibited substances have not been and are not being applied to the operation



- How is the information verified?

- Is sampling conducted to verify NOP requirements **(205.670)**?
 - If so, does certifying agent pay for the tests **(205.670b)**?

- Verify sampling procedures, chain of control etc.
 - What is sampled and why?

 - Are materials used compared to the National List?

- Were labels verified during the on-site inspection?

- Is the exit interview conducted with an authorized representative of the operation

- Does the inspector provide the applicant with a receipt for any samples taken with no charge to the applicant?

Certified Agents Responsibilities

- Adequate information provided to inspector. (Past reports, Farm Plan, past non-conformances specific instructions etc.)

- Client informed of the inspection.

- Insure that only NOP standards are applied.

- Inspection reports, certificates and test results sent to client



Other Areas

- Check complete certification files for all records and compliance to NOP (**Note: Number of files to review is determined by the size of and number of clients of the certifying agent. Files reviewed should include each area that the client is NOP accredited to such as crops, wild crops, livestock, and handlers**)



- Conduct closing meeting (ISO 19011)**
 - Sign out on attendance list;
 - Present audit findings and conclusions;
 - Discuss next steps in process (ARC 1000 Procedure): (1) report sent to DC, (2) program review committee, (3) Program Managers issue report and approval/denial/suspension, (4) Program Managers request corrective and/or preventative actions if necessary;
 - Information about any appeal system on the conduct or conclusion of the audit (ARC 1000 Procedure); and
 - Information on the "Voice of the Customer" customer feedback.

DEFINITIONS

Non-compliance: Any finding that does not meet the requirements as defined by the program. The finding may or may not comprise the integrity of the program or product. An absence, complete breakdown of a program requirement, and isolated incidences are considered a non-compliance.

- Non-compliances:** *(Note: A non-compliance should be value-adding and must be against a specific requirement of the audit criteria.)*
 - NC1 - Explain
 - NC2 - Explain
 - NC3 - Explain
 - NC4 - Explain
 - NC5 - Explain



- NC6 - Explain

- NC7 - Explain

- NC8 - Explain

- NC9 - Explain

- NC10 - Explain