National Organic Program
Witness Audit Checklist for Grower Group

Witness Audit - General Information	
This Checklist is used in conjunction with the Tables 1 through 3 of NOP 2005. The Certification File Review Worksheet, NOP 2005-3, shall be completed prior to conducting the witness audit. This Checklist is used to record evaluation information for Grower Groups. The Witness Audit Checklist shall be used when witnessing a regular operation inspection.	
Witness audit date:	
Name of operation:	
Location of operation:	
Scope of certification requested:	
Scope of certification granted:	
Actual or Demonstration inspection:	
Scope of the inspection:	
Witnessed portions of the inspection:	
Inspector's Name:	
Subcontracted or staff inspector:	
Verify conflict of interest and confidentiality status of inspector:	
Name of knowledgeable representative of the operation:	
Names of anyone else present during the inspection:	
Time Inspection started:	
Time Inspection completed:	
Was there enough time allocated for the inspection?	
Did the inspector verify the corrective actions on previous non-compliances as applicable?	
General information on type of grower group to include: **crops** grown, number of producers in GG, storage facilities, staging areas, handling operations	
General information on materials and inputs used and if they are in compliance with the National List (NL) and annotations.	

As appropriate did the OSP adequately address the requirements for:	
General	
Maintain or improve natural resources *§205.200*	
Crops	
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-Crops	
Wild crop harvesting practice standard *§205.207*	
Livestock	
Origin of livestock *§205.236*	
Livestock feed *§205.237*	
Livestock health care practice standard *§205.238*	
Livestock living conditions *§205.239*	
Pasture Practice Standard *§205.240*	
Handler	
Organic handling requirements *§205.270*	
Facility pest management practice standard *§205.271*	
Commingling and contact with prohibited substance prevention practice standard *§205.272*	

Sampling	
Was a sample pulled during the inspection? *§205.670*	
What was sampled and why?	
Verify sampling procedures, chain of control, etc. *§205.670(c)*	
Did the inspector provide the applicant with a receipt for any samples taken? *§205.403(e)*	
Did the sampling process follow the ACA's sampling procedure?	
Was the inspector charged for the samples? *§205.403(e)*	
Did the ACA pay for the testing? *§205.670(b)*	

Labels	
Were labels verified during the on-site inspection? *§205.403(c)(2)*	
Were the labels being used the same as those approved by the ACA?	

How was the inspector made aware of which labels are approved by the ACA?	
Exit Interview *§205.403(d)* Document information addressed by the inspector during the exit interview	
XXX	
Was the exit interview conducted with a knowledgeable representative?	
Did the exit interview address the accuracy and completeness of the inspection observations?	
Did the exit interview address the need for additional information?	
Did the exit interview address issues of concern identified during the inspection?	

Questions for the inspector: As the inspection progresses insert additional questions to ask the inspector on areas of the inspection/operation that need clarification.		
What did the inspector receive from the ACA in order to conduct the inspection?		
Did the inspector receive:	**Yes**	**No**
A general map indicating the general region of the production zone?		
A more detailed map indicating the location of each of the communities to be inspected?		
Grower lists by community, listing producers, producer codes or numbers, amount of land area under production by each producer, crops, estimated yields, and past production history?		
Organic system plan, certification questionnaire, or application?		
Name of contact persons with phone numbers, both home and work?		
A description of the project to understand how it is organized?		
Previous inspection report?		
Handling plans, questionnaires/applications Are there any processing or storage facilities?		
Information on final sales and distribution?		
In the case of certification updates, was the inspector provided with the most recent certification letter with all conditions for certification clearly stated?		
Additional Questions:		
Does the Inspector have a copy of the NOP Standards?		
If applicable, was the inspector knowledgeable of recent updates to the standards or policy clarifications?		
How is the inspector informed of the ACA's policies and procedures and changes to them?		
Does the inspector provide consulting services of any kind? If so, how is this information provided to the ACA?		
What is the inspector's background (experience, training,		

and education) in relation to Grower Groups in general and specific to the type of GG being inspected?	

Criteria and guidance for Annual Sampling Percentage Rate *(Based on NOSB Recommendation 2008, section III.D.1)*		
Once the annual sampling percentage rate is determined by the ACA, the highest risk sub-units are identified and inspected. Of the remaining samples to be inspected annually, at least 25% of these the sub-units should be selected at random. This helps to prevent the complacency that might be inadvertently encouraged by a certifier focusing only on higher-risk members of the multi-site operation. Example 1: 100 sub-units. Sample rate determined by the ACA: 10%. 3 sub-units are identified by ACA as "high risk" and inspected. Of the remaining 97 sub-units, 7 more will need to be inspected to reach the 10% rate. At least 2 of those (25%) should be selected for inspection at random. Example 2: 100 sub-units. Sample rate determined by the ACA: 30%. 10 sub-units identified as "high risk" and inspected. Of the remaining 90 sub-units, 20 more will need to be inspected to reach the 30% rate. At least 5 of those (25%) should be selected for inspection at random. It is the responsibility of the ACA to instruct the inspectors on which high-risk sub-units must be inspected and the number of lower-risk sub-units that should be sampled based on their determination of the group's over-all risk. The ACA will ensure that this protocol is transparent.		
Assessment of units to be inspected by the ACA's inspector		
A. Annual Sampling Percentage Rate established by ACA:		
B. Total number of sub-units in the PGO:		
C. A multiplied by (x) B = (number of sub-units to be inspected by ACA):		
D. Number of sub-units identified as high risk by ACA and must be inspected:		
E. C subtract (-) D = (number of remaining sub-units):		
F. E multiplied by (x) 25% = (minimum number of sub-units to be selected at random):		
	Yes	**No**
In reviewing the file and "C" above were there a sufficient number of sub-units inspected?		
Was the required number of high risk sub-units inspected? ("D" above)		
Were a minimum of 25% sub-units randomly selected? ("F" above)		
Were the remaining sub-units inspected based on the criteria in section III.D.1?		
Was there a mandatory inspection of new entrants to the production unit?		
Did the ACA properly identify members within the production unit that processed or consolidated product from more than one member and have them inspected annually in accordance with section III.C?		
Remarks:		
XXX		

Questions for the Applicant / Certified Operation: As the inspection progresses insert additional questions to ask the operation's representative on areas of the operation that need clarification	
Did the certified operation receive a copy of the previous	

inspection report, if applicable?	
Did the operation receive a certificate from the ACA?	
Does the client have a current copy of the NOP Standards?	
If applicable, how did the operation receive information on temporary variances?	

Overall did the inspection verify:	
That the operation was in compliance or was able to comply with the ACT? *§205.403(c)(1)*	
That the OSP accurately reflected the practices used by the operation? *§205.403(c)(2)*	
That prohibited substances had not been and were not being applied to the operation? *§205.403(c)(3)*	
Did the inspection include an inspection of all new entrants into the GG since the previous inspection?	
Was there an inspection of all members within the production unit that processed or consolidated product from more than one member?	
Was the annual sampling percentage rate provided to the inspector?	
Was the inspector informed by the ACA which sub-units were classified as high risk and had to be inspected?	
Did the inspection include a review of the GG's internal control system (ICS)?	
Did the inspection include a review of the ICS sanctions policy for members that do not comply with the OSP and NOP standards?	
Did the inspection include a review to ensure the ICS policy required reporting irregularities and minor and major noncompliances to the ACA?	
Did the inspection include a review of the ICS organizational chart to determine if it was maintained	

and its accuracy?	
Did the inspection include a review of the ICS policy for documentation of personnel's disclosure of potential conflicts of interest?	
Did the inspection include a review of the ICS policy for internal inspectors to ensure there was no conflict of interest with the operations they inspect?	
Did the inspection include a review of the ICS training program?	
Was at least one annual training session conducted by an external specialist?	
Were ICS personnel with key program responsibilities knowledgeable of the NOP Program requirements? .	
Did the inspection include a review of all boundaries and verification of adequate buffers for the producers visited?	