



## **2025 ANAB Peer Review Report**

**For**

**Agricultural Marketing Services (AMS)  
National Organic Program (NOP)**

**Dates of Review Panel:  
April 1 to April 10, 2025**

**Prepared by**

**ANSI NATIONAL ACCREDITATION BOARD  
1899 L Street, 11<sup>th</sup> Floor  
Washington, DC 20036**

**Document: 2025-USDA-PeerReviewPanel-01-1-PeerReviewTeam**

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## I. GENERAL INFORMATION

### Accreditation Body

Name of Reviewed Body

**United States Department of Agriculture  
Agricultural Marketing Services (AMS)  
National Organic Program**

Address

1400 Independence Avenue S.W.  
Room 2648 South Building  
Washington, DC 20250

Telephone

202-720-3252

### Review by:

Type of Review

Peer Review Panel Evaluation

Remote Peer Review Dates

April 1- 3, and 7-10, 2025

Review Standard(s)

US 7 CFR Part 205, National Organic Program  
*ISO/IEC 17011:2017 Conformity Assessment – General  
requirements for accreditation bodies accrediting conformity  
assessment bodies*

### Peer Review Team

Lead Reviewer:

**Mario Llerenas**

Technical Reviewer:

**Susan Ranck**

Technical Reviewer:

**Jean Richardson**

ANAB Staff:

**Nikki Jackson, ANAB Senior Accreditation Director  
Erica Hinton – Manager of Accreditation  
Chris Kelly – Senior Manager of Accreditation**

Report Prepared by:

**Mario Llerenas  
Jean Richardson  
Susan Ranck**

Submitted on:

**June 30, 2025**

## II. SCOPE

The NOP is establishing a peer review panel to satisfy adherence to internal and regulatory requirements. ANSI National Accreditation Body (ANAB) convened this panel on March 06, 2025.

The peer review panel is tasked to:

- Evaluate NOP policies processes and procedures for conformance to NOP regulations 7 CFR Part 205 and ISO/IEC 17011;
- Review implementation of certification body accreditation processes through select file review; and
- Report the peer review panel findings in writing to the NOP Deputy Administrator and the National Organic Standards Board.

The panel is reporting their findings in writing to the NOP Deputy Administrator and the National Organic Standards Board. The findings will be considered part of the NOP quality management system.

## III. INTRODUCTION

The National Organic Program (NOP) is part of the Agricultural Marketing Service (AMS), U.S. Department of Agriculture (USDA), and is the organization responsible for activities relating to the development, implementation, and administration of the Organic Foods Production Act of 1990 (OFPA) and the USDA organic regulations. Key functions of the NOP include:

- Developing, reviewing, implementing, and interpreting the organic standards
- Enforcing organic production, handling, and labeling standards
- Accrediting, auditing, and training third-party organic certifying agents

### Panel Members

Susan Ranck – Risk Assessment Evaluator; ANAB Technical Expert, ANAB Technical Assessor in Food

Jean Richardson - Professor Emerita, University of Vermont, Environmental Law and Environmental Studies; Independent organic inspector, IOIA qualified; NOSB 2012-2017; ISO/IEC trained

Mario Llerenas – ISO/IEC 17011 Expert (Qualified Peer Assessor); Risk Assessment Evaluator; ANAB Food Safety Lead Assessor

ANAB Staff – Nikki Jackson, Senior Director, Product Certification Accreditation Program

Erica Hinton – Manager of Accreditation, Product Certification Accreditation Program

Chris Kelly – Senior Manager of Accreditation, Product Certification Accreditation Program

**Document Review** - The review panel conducted a Document Review and completed a working document before the remote evaluation. The working document including the tentative schedule of the personnel to interview during the remote assessment was created on March 24<sup>th</sup>, 2025 and sent to USDA NOP. The Peer Review team used the working document to take notes during the remote assessment, and the findings are included in this report.

### Assessment Plan

The remote assessment plan was issued on March 7<sup>th</sup>, 2025; this version was approved and signed by the Quality Manager of USDA NOP. The assessment plan approved by USDA NOP is uploaded in ANSICA, the ANAB database.

The assessment plan shows a separate Peer Review for the QMS and the Technical assessments. The QMS Peer Review was conducted on April 1<sup>st</sup> to 3<sup>rd</sup>, 2025; the Technical Peer Review was conducted on April 7<sup>th</sup> to 10<sup>th</sup>, 2025.

### Opening / Closing Meetings

In accordance with the assessment plan, the opening meeting was conducted on Tuesday, the 1<sup>st</sup> of April 2025 at 10:00 am with six NOP senior staff and the ANAB Peer Review team in attendance. At the end of the opening meeting, the NOP Associate Deputy Administrator, Andrew Malone, explained the key changes in the organizational structure of the NOP, the accreditation process, and its relationship with other governmental departments.

The closing meeting for the remote Peer Review was conducted on Thursday, 10<sup>th</sup> of April 2025 at 3:00 pm with five NOP persons and the Peer Review team in attendance. The results of the remote assessment were discussed during the Peer Review closing meeting:

Zero (0) findings and six (6) comments with observations for NOP to consider in its management system were identified during this remote Peer Review.

### Additional Comments

The management system of USDA NOP is very well documented and implemented, and functions in accordance with ISO/IEC 17011:2017 and US 7 CFR Part 205, National Organic Program requirements.

The Peer Review team was very impressed by the improvements in the organization, resources, and accreditation process since the last Peer Review in 2023. Significant improvements have been implemented since the last Peer Review in both the QMS and the Accreditation Process.

The NOP personnel demonstrated sound knowledge in both management system and technical requirements. Evidence of these improvements is especially reflected in the organization's progress in reducing the year-to-year carryover of evaluations activities.

The NOP program management also demonstrated commitment to continuous improvement.

## IV. RESULTS OF PEER REVIEW PANEL EVALUATION

1. **METHODOLOGY** - The Peer Review team verified the compliance of USDA NOP to 7 CFR 205 Part 205 and ISO/IEC 17011:2017 based on the sampling of documents, interviews, and records; the Peer Review team selected 5 accreditation files and associated NOP qualified assessors and staff in order to verify the accreditation process and competency. The conclusions of the Peer Review team are based on objective evidence collected and observed during the assessment and are contained in this report as compiled by the lead and technical evaluators.
2. **Previous OFIs** – There were no findings documented by the Peer Review team during the 2023 remote assessment to verify.

<b>2023 Opportunity for Improvement</b>	<b>2025 Verification of the effectiveness</b> <b>Not Applicable</b>
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3. **2025 Opportunities for Improvement.** During this remote assessment, the Peer Review team did not identify any finding/opportunity for improvement.
4. **2025 Comments.** During this remote assessment, the Peer Review team identified six (6) observations classified as Comments. These comments originated from the Peer Review team and can be considered by NOP as examples of best practices in the accreditation process.

<b>COMMENT # 1</b>
Confidentiality: NOP website contains information on Confidentiality (FOIA); however, the Terms of Accreditation does not include the Confidentiality clause. NOP can improve the Handbook mentioning the Confidentiality policy (statement included in the Quality Manual) Reference: ISO/IEC 17011 Clause 8.1 Confidential Information.

**COMMENT # 2**

Document Control: NOP controls change to documents by saving previous versions of the document. However, it can sometimes take time to find the previous version, and changes are not always flagged. NOP can increase efficiency by tracking changes through tools such as SharePoint with a summary of the reason for the change to the new version.  
Reference: ISO/IEC 17011 Clause 9.3 Document Control.

**COMMENT # 3**

Records Control: NOP is still working on the new document with a table showing the type of records, responsibility, storage location, retention time and final disposition.  
Document: NOP Records File Plan and Disposition Schedule – WIP. The document is still in Draft and in the process of approving. The due date is the end of 2025.  
Reference: ISO/IEC 17011 Clause 9.4 Records Control.

**COMMENT # 4**

Peer Review: Peer Review was not conducted in 2024 in accordance with the NOP procedure due to the US governmental shutdown. The 2024 Peer Review Panel was moved to 2025.  
Reference: ISO/IEC 17011 Clause 9.6 Internal Audits / NOP 1000 section 9.7.2 Peer Review.

**COMMENT # 5**

Accreditation Comment – The recently implemented Organic Integrity Database (OID) system utilized by certifiers to generate standardized certificates of organic operation is not sufficient to reliably handle the volume of work in a timely manner. This is especially problematic for generation of Import/Export certificates.  
Reference: ISO/IEC 17011 Clause 9.7.8 Accreditation Information.

**COMMENT # 6**

Appeals The NOP has identified one person responsible for review and recommendation for all appeals. There is significant risk associated with the lack of additional persons familiar with the appeals process.  
Reference: ISO/IEC 17011 Clause 9.13 Appeals.

5. **2025 Strengths.** The Peer Review team identified positive processes and activities during the 2023 remote assessment. The following are the strengths identified by the team:

NOP PROCESS	COMMENTS
<b>Quality Management System</b>	<p>The NOP Quality Management System (NOP 1000) is documented in accordance with ISO/IEC 17011 and 7 CFR Part 205.</p> <p>NOP demonstrated that the system is well documented and implemented.</p>
<b>NOP objectives and goal</b>	<ol style="list-style-type: none"> <li>1. The SOE Project has already been implemented including all associated policies</li> <li>2. SHAREPOINT has already been implemented for all the documents.</li> </ol>

<b>Quality Manager</b>	Knowledge, experience and commitment of the current Quality Manager on the implementation and monitoring of the Quality Management System.
<b>NOP Staff</b>	High Quality of staff – The NOP Accreditation Division staff has a very strong, cross functional team environment. Enhancements in staffing responsibilities and accountability, including elevation of the Audit Manager position to Assistant Director, has further elevated the performance of the team.
<b>Teamwork</b>	Cross Divisional Teamwork, including for example Materials expertise, has increased efficiencies in all divisions, enhanced the accreditation process and strengthened enforcement.
<b>Risk Analysis</b>	The organization has implemented a risk-based evaluation as part of the prioritization of activities in both accreditation and materials review processes. This has proven effective for emphasis on certifiers and activities that require additional attention and is evidenced in the enforcement activities of the division.
<b>Education</b>	All the outreach and education both in USA and overseas, such as at Biofach about SOE and the Organic Integrity Learning Center. Usage of the Organic Integrity Learning Center has increased exponentially over the last 2 years with FY 2024 usage at >15,000 trainings delivered.
<b>Regulations</b>	Rolling out the Organic Livestock and Poultry Rule and education associated with this. Survey of all Certifiers for compliance with SOE and associated steps to achieve full compliance.
<b>Improvements</b>	<p>The NOP has transitioned from an internal storage system to the Microsoft SharePoint data sharing environment. This change is now fully implemented and was observed to be extremely effective for team access, document control, security and document availability.</p> <p>The complaints process has transitioned into the CMTS system. A demonstration of this process revealed it to be superior to the old system in terms of linkage, data availability and transparency. Users of the system spoke very positively of its effectiveness.</p>

## V. CONCLUSION

This report completes the work of the 2025 ANAB Peer Review for the USDA NOP accreditation body. The review covers the NOP's conformance with ISO/IEC 17011:2017 as well as a review of NOP's accreditation procedures, process, reviews, decisions, and conformance with 7 CFR Part 205.

The Peer Review Panel members conclude that USDA NOP and staff continue to operate in conformance with ISO/IEC 17011:2017, 7 CFR Part 205 and with NOP's own policies and procedures. No findings and six observations classified as comments were identified during this remote assessment.

NOP management clearly demonstrated a sustained commitment to advancing their process, as noted by the Peer Review Team.

The Peer Review team would like to express appreciation to USDA NOP personnel for their cooperation and commitment during the Peer Review assessment.

----- **END OF REPORT** -----