



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 NOP Accreditation Assessment Checklist. NOP 2005-3 Certification File Review Worksheet must be completed prior to conducting the witness audit. This checklist is used to record evaluation information for grower groups. NOP 2005-4 Witness Inspection Checklist must 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 inspector's conflict of interest and confidentiality status:	
Name of knowledgeable representative of the operation:	
Name(s) 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 noncompliances as applicable?	
General information on type of grower group to include: crops grown, number of producers in grower group, storage facilities, staging areas, and handling operations	
General information on materials and inputs used and whether they are in compliance with the National List (NL) and annotations	



As appropriate did the organic system plan (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)	
Handling	
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 certifier's sampling procedure?	
Was the inspector charged for the samples? (§ 205.403(e))	
Did the certifier pay for the testing? (§ 205.670(b))	
Labels	
Were labels verified during the onsite inspection? (§ 205.403(c)(2))	



Were the labels being used the same as those approved by the certifier?	
How was the inspector made aware of which labels were approved by the certifier?	
Exit Interview (§ 205.403(d))	
Document information addressed by the inspector during the exit interview	
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 certifier 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?			
OSP, 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 USDA organic regulations?			
If applicable, was the inspector knowledgeable of recent updates to the regulations or policy clarifications?			
How is the inspector informed of the certifier'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 certifier?	
What is the inspector's background (experience, training, and education) in relation to grower groups in general, and specific to the type of grower group being inspected?	

Criteria and guidance for annual sampling percentage rate
 (Based on NOSB Recommendation 2008, section III.D.1)

Once the certifier determines the annual sampling percentage rate, the highest risk subunits are identified and inspected. Of the remaining samples to be inspected, at least 25% of these subunits 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 subunits. Sample rate determined by the certifier: 10%. 3 subunits are identified by the certifier as "high risk" and inspected. Of the remaining 97 subunits, 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 subunits. Sample rate determined by the certifier: 30%. 10 subunits are identified as "high risk" and inspected. Of the remaining 90 subunits, 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 certifier's responsibility to instruct the inspectors on which high-risk subunits must be inspected and the number of lower-risk subunits that should be sampled based on their determination of the group's overall risk. The certifier will ensure that this protocol is transparent.

Assessment of units to be inspected by the certifier's inspector		
A. Annual sampling percentage rate established by certifier:		
B. Total number of subunits in the Producer Group Operation (PGO):		
C. A multiplied by (x) B = number of subunits to be inspected by certifier:		
D. Number of subunits identified as high risk by certifier and must be inspected:		
E. C subtracted from (-) D = number of remaining sub-units:		
F. E multiplied by (x) 25% = (minimum number of subunits to be selected at random):		
	Yes	No
In reviewing the file and "C" above were there a sufficient number of subunits inspected?		
Was the required number of high risk subunits inspected? ("D" above)		
Were a minimum of 25% of subunits randomly selected? ("F" above)		
Were the remaining subunits inspected based on the criteria in the 2008 NOSB Recommendation, section III.D.1?		
Was there a mandatory inspection of new entrants to the production unit?		
Did the certifier 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 the 2008 NOSB Recommendation, section III.C?		
Remarks:		

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 certifier?	
Does the client have a current copy of the USDA organic regulations?	
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 USDA organic regulations? (§ 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 grower group 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 inspector which subunits were classified as high risk and had to be inspected?	
Did the inspection include a review of the grower group'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	



USDA organic regulations?	
Did the inspection include a review to ensure the ICS policy required reporting irregularities and minor and major noncompliances to the certifier?	
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 requirements?	
Did the inspection include a review of all boundaries and verification of adequate buffers for the producers visited?	

Witness Audit – Auditor findings and citations
Finding 1
Finding 2
Finding 3
Finding 4



United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

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

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Witness Audit – Auditor follow up requests or activities

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