



2023 ANAB Peer Review Report

For

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

**Dates of Review Panel:
September 18 to September 28, 2023**

Prepared by

ANSI NATIONAL ACCREDITATION BOARD
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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**

On-site Peer Review Dates **September 18, 19, 26, 27 and 28, 2023**

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**

ANSI Staff: **Nikki Jackson, ANAB Senior Accreditation Director**

Report Prepared by:

**Mario Llerenas
Jean Richardson
Susan Ranck**

Submitted on: **November 3, 2023**

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 July 14, 2023.

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 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

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 September 8th, 2023, 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 July 25, 2023; 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 September 18 to 19, 2023; the Technical Peer Review was conducted on September 26 to September 28, 2023.

Opening / Closing Meetings

In accordance with the assessment plan, the opening meeting was conducted on Monday, September 18, 2023, at 11:00 am with six NOP senior staff and the ANAB Peer Review team in attendance. At the end of the opening meeting, the NOP Deputy Administrator, Jennifer Tucker, 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, 28 of September 2023 at 4:00 pm with five NOP staff and the Peer Review team in attendance. The results of the remote assessment were discussed during the technical closing meeting:

Zero opportunities for improvement (OFI) and six 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.

NOP was able to establish and put in place significant improvements since the 2022 Peer Review in both the QMS and the Accreditation Process. NOP implemented more risk-based based processes and have transitioned to a unified SharePoint document sharing system.

NOP personnel demonstrated sound knowledge in both the management system and technical requirements. NOP program management also demonstrated commitment to continuous improvement as evidenced through the resolution of internal and peer review-identified risks.

IV. RESULTS OF PEER REVIEW PANEL EVALUATION

1. **METHODOLOGY** - The Peer Review team verified the compliance of USDA NOP to 7 CFR Part 205 and ISO/IEC 17011:2017 based on the sampling of documents, interviews, and records; the Peer Review team selected five accreditation files as well as associated NOP qualified assessors and staff personnel records 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 2022 remote assessment to verify.

2022 Opportunity for Improvement	2023 Verification of the effectiveness Not Applicable
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3. **2023 Opportunities for Improvement.** During this remote assessment, the Peer Review team did not identify any finding/opportunity for improvement.
4. **2023 Comments.** During this remote assessment, the Peer Review team identified six observations classified as Comments. These comments originated from the Peer Review team and can be considered by NOP as examples of good practices in the accreditation process.

COMMENT # 1
NOP 1010 NOP Quality Management System Section 4.6 says “Obsolete Documents requires the Quality Manager adds an “Archived” watermark to the document.” The procedure for communication distribution and watermarking obsolete documents are not always following by NOP. Reference: ISO/IEC 17011 Document Control 9.3

COMMENT # 2
<p>NOP's current policy is to keep records indefinitely. NOP is developing a new file plan for records retention and disposition: Document: NOP Records File Plan and Disposition Schedule – WIP. The document is still in Draft and in process to be finalized and approved. Reference: ISO/IEC 17011 Records Control 9.4</p>

COMMENT # 3
<p>The Quality Manual in the section 9.6 Improvement includes the section 9.6.1 Preventive Actions and makes reference to the NOP 1020 Corrective and Preventive Actions; however, there is no reference to the actions related to the risks identified by NOP. Evidence of these risk-based actions were observed in the Management Review meeting notes. However, the Quality Manual does not include the preventative actions documented during management reviews. Reference: ISO/IEC 17011 Improvements 9.6</p>

COMMENT # 4
<p>NOP should maintain optimum staffing levels and training, to ensure NOP has adequate staffing for the March 2024 implementation of Strengthening Organic Enforcement. Reference: ISO/IEC 17011 Competence of Personnel 6.1</p>

COMMENT # 5
<p>NOP and prior peer reviews have identified the timeline for mid-term and renewal assessments (from initiation to reaccreditation) to be excessive (>18 months). NOP has made strides in reducing this time frame and was recently observed to complete a midterm assessment in less than 12 months. It is necessary the NOP continues to emphasize meeting average acceptable time frames. Reference: ISO/IEC 17011 Accreditation Decision-making 7.7</p>

COMMENT # 6
<p>NOP has one person responsible for appeal reviews and recommendations, and an additional staff person trained on the intake of appeals in the absence of the primary person. However, there is significant risk associated with the lack of additional persons familiar with the appeals process. Reference: ISO/IEC 17011 Appeals 7.13</p>

2023 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
Quality Management System	<p>The NOP Quality Management System is documented in accordance with the ISO/IEC 17065 and 7 CFR Part 205.</p> <p>NOP demonstrated that the system is well documented and implemented.</p>

NOP objectives and goals	<ol style="list-style-type: none"> 1. Strengthening Organic Enforcement completed the rulemaking process and NOP, and certifiers are providing education for the March 19, 2024, implementation due date. 2. NOP improved its access to all documents and records by implementing SharePoint and is expected to be fully integrated by the end of 2023.
Collaborative Teamwork	<ol style="list-style-type: none"> 1. All staff interviewed demonstrated a collaborative team approach to their work, which resulted in increased efficiencies on all aspects of the accreditation process. 2. Staff seek input and effectively collaborate across all divisions. 3. Staff indicate knowledge of the Strategic Plan. 4. Staff were consistently articulate and passionate in describing their work.
Team Leadership	<ol style="list-style-type: none"> 1. Staff consistently describe the Deputy Administrator's leadership style as open, transparent, and collaborative which empowers them in their work and leads to successful outcomes. 2. NOP auditors and management staff exhibited a strong cross-functional understanding of the goals and methods of accreditation specific to the program. There is a consistent and far-reaching passion for the work and mission as exhibited by interviews with various positions within the organization.
Assessment	<ol style="list-style-type: none"> 1. NOP has finalized a risk-based approach to audits, and is now able to schedule audits more efficiently, many months ahead of time, and grouped in geographic areas of the world. 2. NOP has established a comprehensive risk-based program in India with the intention of carrying this forward to other high-risk regions.
Competency	<ol style="list-style-type: none"> 1. All NOP staff interviewed and taking part in the Peer Review demonstrated competency. 2. NOP continues to expand learning opportunities for certifiers and inspectors.
Number of Staff	The NOP has and continues to hire staff in all divisions to administer the Program efficiently.
NOP Responsive to Public Comment	<ol style="list-style-type: none"> 1. NOP continues to seek stakeholder input through its collaborative work with the National Organic Standards Board (NOSB). 2. NOP continues to effectively use the NOSB for guidance, rulemaking, and National List review.

V. CONCLUSION

This report completes the work of the 2023 ANAB Peer Review for the USDA NOP accreditation body. The review covers the NOP's compliance with ISO/IEC 17011:2017 as well as a review of NOP's accreditation procedures, 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 consistently demonstrated their commitment to improvement to 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** -----