



Audit Noncompliance Analysis

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National Organic Program





- Noncompliance Analysis— FY16
- Areas for Improvement

Noncompliance Analysis



- Analysis of certifier noncompliances resulting from audits in FY16
- 32 Audit Reports reviewed
 - *15 domestic and 17 international*

Noncompliance Analysis



- Scope of Accreditation Audits
 - 3 Pre-decisional audits
 - 2 Initial audits
 - 7 Renewal of Accreditation audits
 - 20 Mid-term audits

Analysis Averages FY16



- Average checklist score
 - Based on regulatory compliance verified by auditors (NOP 2005)
- Average noncompliances per audit
 - Based on the # of noncompliances issued in noncompliance reports

§ 205.403 Inspection

Based on a review of the Certification File Review Worksheets, information gathered during the review of the certification process, interviews, and Witness Audit Checklists.

CHECKLIST SECTION III	Complies ³			Remarks ⁴
	Yes	No	N/A	
§ 205.403(b)(2) Are all inspections conducted when an authorized representative of the operation who is <u>knowledgeable</u> about the operation is present <u>and</u> at a time when land, facilities, and activities that demonstrate the operation's compliance with or ability to comply with the applicable provisions of subpart C can be observed? Table of Contents				
§ 205.403(c)(1) Do all inspections verify the operation's compliance or ability to comply with the Act and the regulations? Table of Contents				
§ 205.403(c)(2)				

Noncompliance Analysis



- What does NOP do with this information?
 - Analyze patterns of noncompliances
 - Share the information with certifiers
 - Provide training on areas with high noncompliance rates
 - Adjust our procedures and audits to focus on problem areas



- Analysis of Noncompliances – FY16
- Areas for Improvement

Areas for Improvement



Certifiers must ...

- Ensure procedures, forms, and staff demonstrate the ability to fully comply with accreditation requirements.
- Use of a sufficient number of adequately trained personnel to carry out certification.

Areas for Improvement



Certifiers must ...

- Follow NOP 2603 Organic Certificates Instruction. (e.g. ensure certificates properly list the scopes of certification)

Sample certificate. Certifiers can generate these from INTEGRITY database.



Certifier Name Phone — Email Website Street 1 Street 2 City, State/Province ZIP/Postal Code certifies that		CERTIFIER LOGO
Organic Operation Name Phone — Email Website Street 1 Street 2 City, State/Province ZIP/Postal Code Country		
is certified to the USDA organic regulations, 7 CFR Part 205, for the categories Crops, Wild Crops, Livestock, Handling/Processing		ORGANIC CERTIFICATE
Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended, or revoked. Status of this certification and specific certified organic products covered may be verified at https://apps.ams.usda.gov/integrity/CP/OPP.aspx?cid=0&nopid=000005358		
Certifier Client ID: 5358 Certificate Number(s): C005, WC007, L013, HP009 NOP Operation ID: 0000005358 Effective Date: October 18, 2007 Anniversary Date: October 18, 2016 Issue Date: September 26, 2016		A square QR code located at the bottom right of the certificate, used for verification. A smaller version of the USDA Organic logo at the bottom right of the certificate.

Areas for Improvement



Certifiers must ...

- Verify international product imports and exports.

Areas for Improvement



Other areas for improvement...

- Reviewing applications completely
- Inspection processes
- Following all steps of noncompliance and adverse action procedure

Areas for Improvement



Other areas for improvement...

- Conducting annual performance evaluations
- Sampling
- Unannounced inspections
- Grower group evaluations

Preventing Noncompliances



An option is to conduct your annual internal audit using the same audit checklist NOP auditors use (NOP 2005).

Questions?

