



Submitting Corrective Actions to the NOP

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Training Overview



- Review the process for developing and submitting corrective actions
- Review the components of a corrective action submission
- Practice developing a corrective action



The NOP issues a certifying agent a Notice of Noncompliance when the certifying agent is not complying with NOP requirements.

*“Certifying agents are required to submit **corrective actions that adequately address noncompliances identified by the NOP.**”*

See *NOP 2608 Instruction Responding to Noncompliances* in the [NOP Program Handbook](#)

Example - Noncompliance



NC1 – 7 CFR §205.404(b)(3) states, “The certifying agent must issue a certificate of organic operation which specifies the: Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation.”

Comments: *A review of nine organic certificates issued by De Best Certified Organic (DBCO) revealed that all nine certificates did not specify the categories of operation.*

Reading the noncompliance



- The noncompliance cites the specific USDA organic regulation the certifying agent is not complying with.
- The comments section explains how the certifying agent is not in compliance.

If you need clarification, contact your accreditation manager

Developing the Corrective Action



- First, identify the underlying cause(s) of the noncompliance.
- Then, determine which appropriate actions should be taken to correct the cause of the noncompliance and prevent reoccurrence.

Corrective Action Submissions



- The corrective action submission should describe the actions taken to correct the cause of the noncompliance and prevent reoccurrence
 - ❖ *Submission must include objective evidence (i.e. documentary evidence) supporting the actions*
 - ❖ *For corrective actions that will be implemented at a later date, include the implementation date and timeframe for completion*

Corrective Action Submissions



- Organize the corrective action submission so that it can be easily reviewed and understood
- Recommended formats for corrective action submissions:
 - Table
 - Bullets Points

Example - The Noncompliance



NC1 – 7 CFR §205.404(b)(3) states, “The certifying agent must issue a certificate of organic operation which specifies the: Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation.”

Comments: *A review of nine organic certificates issued by De Best Certified Organic (DBCO) revealed that four certificates did not specify the categories of operation.*

Example – Identifying the Cause



What is (are) the underlying cause(s) of the noncompliance?

- *DBCO's organic certificate template does not include categories of operation.*
- *DBCO's procedures require staff to type in the information each time a certificate is generated.*

Example – Correcting the Noncompliance



Action taken by DBCO to correct the noncompliance:

The four operations were issued new certificates specifying the operation's category(ies) of operation.

Example – Correcting the Noncompliance



Documentary evidence supporting the action taken to correct the noncompliance:

Copies of the four newly issued, compliant certificates

Example – Preventing Reoccurrence



Actions taken by DBCO to prevent a reoccurrence of the noncompliance:

- *DBCO's certificate template was revised to include categories of organic operation.*
- *DBCO's procedure for issuing certificates was revised to include an additional step for staff to verify that the certificate issued includes certification categories.*
- *Certification staff were provided with training on the revised certificate template and procedures on November 12, 2015.*

Example – Preventing Reoccurrence



Documentary evidence supporting actions taken to prevent a reoccurrence of the noncompliance:

- *Revised certificate template*
- *DBCO's revised Administrative Manual, with the revised certificate issuance procedure highlighted*
- *Training agenda and attendance list*

Example - Organizing the Corrective Action



Bullet Points

NC1 – 7 CFR §205.404(b)(3) states, “The certifying agent must issue a certificate of organic operation which specifies the: Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation.”

Comments: *A review of nine organic certificates issued by De Best Certified Organic (DBCO) revealed that four certificates did not specify the categories of operation.*

- **Corrective action** – DBCO issued the four operations new certificates specifying the operation’s category(ies) of operations.
- **Evidence of Corrective Action** – See Attachment 1 - Certificates



Bullet Points (Cont.)

- **Preventive action** – DBCO revised its certificate template to include categories of organic operation. Additionally, DBCO's procedure for issuing certificates was revised to include an additional step for staff to verify that the certificate includes certification categories. Certification staff were provided with training on the revised certificate template and procedures on November 12, 2015.
- **Evidence of Preventive Action** – See Attachment 2 – Certificate Template; Attachment 3 – DBCO Administrative Manual; Attachment 4 – Training Agenda; Attachment 5 – Training Attendance List

Example - Organizing the Corrective Action



Table Format

	Corrective Action (CA)	Preventive Action (PA)	Objective Evidence
NC.1	DBCO issued the four operations new certificates specifying the operation's category(ies) of operations.	DBCO revised its certificate template to include categories of organic operation. Additionally, DBCO's procedure for issuing certificates was revised	(CA) Attachment 1 - Certificates (PA) Attachment 2 - Certificate Template; Attachment 3 – DBCO Administrative Manual ...

Components of a Corrective Action Submission



1. Description of action(s) taken to correct the noncompliance
2. Objective evidence supporting the action(s) taken to correct the noncompliance
3. Description of action(s) taken to prevent a reoccurrence of the noncompliance
4. Objective evidence supporting the action(s) taken to prevent a recurrence of the noncompliance

Exercise 1 - Writing a Corrective Action



Write a corrective action for the following noncompliance:

NC2 – 7CFR §205.311(b)(1) states, “The USDA seal must replicate the form and design of the example in figure 1 and must be printed legibly and conspicuously: On a white background with a brown outer circle”

Comments: *DBCO approved three labels on which the USDA organic seal was noncompliant. On all three labels, the USDA organic seal was printed on a white background with a red outer circle.*

Exercise 2 - Writing a Corrective Action



Write a corrective action for the following noncompliance:

NC3 – 7 CFR §205.501(a)(6) states, “A private or governmental entity accredited as a certifying agent under this subpart must: Conduct an annual performance evaluation of all persons who ... perform on-site inspections”

Comments: *DBCO did not conduct performance evaluations of all its contracted inspectors in 2014.*

Exercise 3 - Writing a Corrective Action



Write a corrective action for the following noncompliance:

NC4 – 7 CFR §205.670(d) states, “A certifying agent must, on an annual basis, sample and test from a minimum of five percent of the operations it certifies, rounded to the nearest whole number.”

Comments: *DBCO did not sample and test at least 5% of its operations in 2014. The certifier had a total of 92 certified operations, and therefore should have sampled and tested from at least 5 operations. DBCO only sampled and tested 4 operations.*

Questions?

