

National Organic Standards Board
Certification, Accreditation, Compliance Subcommittee
Oversight Improvements to Deter Fraud: Consistent Location Identification
Discussion Document
February 14, 2023

Challenge:

The location of certified organic operations, including fields is inconsistently recorded and managed across certifiers. This challenges the industry, leading to a gap in certifiers' ability to accurately cross-check the operations and fields they certify with other certifiers. Furthermore, some certifiers cannot conduct independent verification or unannounced inspections of fields because they don't have mapping capabilities of all field locations.

Solution:

Certifiers located both domestically and internationally can seamlessly harmonize the data intake of their clients when producers request to certify new fields for organic certification. By requesting the geolocation of certified operations, certifiers will be able to receive consistent data that is easily managed while also allowing the inspectors to confirm the accuracy of the data during the inspection and use it as a cross-check.

Background:

the new Strengthening Organic Enforcement (SOE) rule will make supply chain tracebacks and mass balances mandatory. Complete supply chain tracebacks will require many certifiers to work bi-directionally up and down the supply chain in cooperation with other certifying bodies.

In addition to the SOE, the [Federal Transition Initiative](#) currently being rolled out across the US discusses ways to improve existing programs that support organic transition and markets. Consistency with certified operation location identification and verification of land eligibility is important and can be accomplished through requiring geolocation for all certified operation.

According to several certifiers interviewed for this document, the data requested when receiving an application for certification for a new field typically includes the name of the field and the number of acres. Some certifiers request the address or driving locations. Still, many certifiers confirmed that if asked, they would be unable to locate each field they certify via google maps or other interactive GPS databases. This lack of data cripples certifiers' ability to act quickly in the case of aggregated mass balance investigations across their clients or in the case of a major contamination event.

Consistent Location Identification:

Consistency in field identification should be required to comply with the soon-to-be SOE-mandated supply chain traceback since a method for consistent field identification exists worldwide.

In the Fall of 2021, the NOSB received the following comment/question regarding the proposed rule on Strengthening Organic Enforcement (SOE), "Will the final rule require mandatory data reporting to NOP by crop type, acreage, and location; and a number of animals by livestock type and location, at least on an annual basis to the Organic Integrity Database (OID)? A requirement for certifying agents to report production area certified by crop/livestock and location, on at least an annual basis, to the OID is one of the most impactful single actions that can be taken to increase integrity in the global organic control systems." This commenter's question provided a road map for CACS.

1. At the Fall 2022 NOSB meeting, the proposal, "Oversite Improvements to Deter Fraud: Acreage Reporting", was unanimously passed by the Board.
 - a. That recommendation's importance was to balance and cross-check that the volume of certified acres (under the NOP) ultimately supports the volume of organic products produced and sold (under the NOP).
2. At the Spring 2023 NOSB meeting, the discussion document "Oversite Improvements to Deter Fraud: Consistent Location Identification" will receive public comment and be discussed by the NOSB.
 - a. The discussion document's purpose is to establish the structure and system for universal field location identification for organic producers, certifiers, inspectors, and the NOP, to register, verify, and cross-check the location of all acres certified under the NOP, both domestically and internationally.

The Strengthening Organic Enforcement (SOE) Rule:

The SOE states, "Certifying agents must be able to conduct unannounced inspections of any operation they certify. Therefore, AMS requires that certifying agents only accept applications for certification or continue certification from operations for which the certifying agent is able to conduct unannounced inspections. To ensure consistency, transparency, and accountability, certifying agents are expected to describe the areas where they operate in the written materials they provide to both applicants and certified operations, and review the locations of all operations during their application review or annual review. A certifying agent that cannot conduct unannounced inspections in an applicant's or certified operation's location due to logistical challenges, staffing, security, or other reasons, is considered to not have the administrative capacity for certification activities in that area, consistent with § 205.501(a)(19)."

A consistent process for locating certified organic operations, including fields, would aid in executing parts of the SOE, including cross-checking and supply chain verification.

History, Evolution, and Benchmarking of Geo-Referencing Information:

1. **Global Navigation Satellite Systems (GNSS) and Global Positioning Systems (GPS)** - In the 1970s, the United States military began using a form of GNSS called GPS for navigation, which became publicly available in the early 2000s.
 - a. GPS allows for navigation to any point of interest, anywhere in the world.

- b. According to [GPS.gov](https://www.gps.gov), “GPS is a U.S. - owned utility that provides users with positioning, navigation, and timing (PNT) services.....24 operating satellites are transmitting one-way signals that give current GPS satellite position and time.” GPS is generally expressed as specific latitude and longitude coordinates
- c. Russia, China, and the European Union also have a GNSS similar to GPS.
 - i. Japan and India have regionally based systems.
- d. The GPS is the oldest of all the GNSS.
 - i. [GPS.gov](https://www.gps.gov) states, “the American taxpayer pays for the GPS service enjoyed throughout the world. All GPS program funding comes from general U.S. tax revenues....there are no plans to privatize GPS, as US Law and policy require the civil GPS service to be provided free of direct user fees.”

2. Keyhole Markup Language (KML) and Keyhole Markup Language Zipped (KMZ)

- a. [KML](https://www.kmlformat.com/) is a file responsible for storing map locations that can be viewed with the following:
 - i. Geographical Information Systems (GIS) such as ArcGIS
 - ii. Geospatial Tools such as Google Earth Pro
- b. [KMZ](https://www.kmlformat.com/) is a Zip-compressed version of a KML

The precedence of geo-referenced data is found within the USDA Currently:

1. Risk Management Agency (RMA):

- a. Having exact location information provides enhanced transparency and oversight. The Risk Management Agency’s General Standards Handbook Section 1.c. of the Maintaining Organic Records states, “a requirement for organic producer’s record keeping is that “insured must have, e.g., aerial or GIS (Geographical Information System) maps, from the organic farming operation that show the exact location of each field for certified organic, transitional, buffer zone, and conventional acreage not maintained under an organic practice.”

2. Certifier Community:

- a. Several Certifiers are already collecting town, range, and section (TRS) data with others using “GPS Coordinates.” How can those certifiers share with other ACAs their intake process?
- b. One certifier creates a KMZ, in Google Earth Pro, for every "site" (synonymous with field), collecting location information (latitude/longitude) from the middle of each site. The business provides location and latitude/longitude; inspectors verify that info and create a KMZ file.

Low Burden - One-Time Collection:

By requiring a consistent method of location identification information through GPS coordinates, it will be easy and low-burden to achieve consistency across all geographic locations, domestic and international.

For organic operations that do not have access to this information, the information can be easily obtained once and then used from that point forward. GPS is free and accessible globally and can serve as the logical path forward for consistently capturing location information domestically and internationally.

GPS proposed framework for location information:

1. One GPS coordinate (including latitude and longitude) for location identification of each location, such as a certification office, brokerage or importer office, manufacturing facility, handling facility, field, production unit - a field in a grower group, etc.
 - a. A GPS coordinate in the center of the field can be a best practice.

In Summary:

There has been a lot of positive momentum for increased continuous improvement within the Organic Community with special attention given to the recent finalization of the SOE Rule and the introduction of the Federal Transition Initiative. In the spirit of this effort, the NOP can help certifiers make the information collected as part of the requirement to verify land eligibility consistent by requiring certifiers to collect the geolocation for all operations including the fields they certify. Consistency within the organic community is essential.

CACS has two specific recommendations for discussion:

1. Consistency amongst all accredited certifiers to use a universal system, the GPS, to obtain specific location data information of all certified operations (fields, production units - grower groups, handling locations, importers, brokers, certifiers, etc.).
2. Previous land affidavits include and are reconciled with GPS location information - which is essential for both domestic and international.

Questions for our stakeholders:

1. Are you currently collecting field-level location information? If so, what method are you using to collect this information?
2. Which certifiers currently request GPS coordinate information to identify locations of organic fields?
3. Certifiers: Are you able to locate every field you certify via the information provided solely by your client (e.g., maps, field history, OSPs), or would you need the certified client to show you where the field is located?
4. What would be the best GIS or Geospatial Tool for certifiers and inspectors to view aggregated location data via maps?

Motion to accept the discussion document on Modernizing Organic Infrastructure - Consistent Location Identification

Motion by: Amy Bruch

Seconded by: Carolyn Dimitri

Yes: 7 No: 0 Abstain: 0 Recuse: 0 Absent: 1