

National Organic Standards Board
Compliance, Accreditation and Certification Subcommittee Proposal
Inspector Qualifications and Training
February 26, 2018

I. INTRODUCTION

Since passage of federal organic standards over twenty years ago, the organic sector has seen rapid growth to nearly \$50 billion in sales in the U.S. Such growth has driven expansion in organic production around the globe, and in turn, the growth of increasingly complex organic supply chains. With well-publicized incidents of proven fraudulent imports in the last year, and recognition such fraud impacts all players in the trade, the need for qualified inspectors experienced in a broad range of operations diverse in scope and scale has never been greater.

Inspectors play an essential role in organic certification, often serving as the sole public face of a certification agency (certifier) to the certified operation. Inspectors are the eyes and ears of the certifier, responsible for verifying and documenting organic control points. They play a crucial role in protecting the integrity of the organic supply chain.

USDA organic regulations require that certification staff, including inspectors, have sufficient expertise in organic production and handling techniques (7CFR 205.501(a)). This proposal seeks to highlight the criteria for qualifications and training necessary to be an effective and competent inspector. The Subcommittee acknowledges this discussion can just as easily relate to certification reviewers—and certifiers at large—as it does to inspectors. The criteria outlined below should be considered essential for all individuals and certifiers; however, for the purpose of this document we are focused on the inspector.

The Subcommittee recognizes the extensive body of work that has already been created in an effort to build the foundation for a skilled pool of organic inspectors. We do not intend for this to substitute for that work but to further build on this foundation, with particular focus on complex organic supply chains.

Many resources regarding inspector training and qualification exist and there are general agreements among certifiers on the minimum qualifications they outline. Nevertheless, USDA organic regulations do not include mandatory requirements for inspector qualifications or training. The Subcommittee proposes that the establishment of mandatory qualifications, ideal levels of experience or background, and compulsory continuing education tied to the scope and scale of operations to which inspectors would be assigned, would strengthen the certification system.

II. BACKGROUND

The initial and continuing training of inspectors and the establishment of minimum and ideal qualifications is not a new topic. Since 1991, the International Organic Inspectors Association (IOIA) has promoted and provided inspector training to provide a basis for consistency and integrity in certification. Certifiers and independent training organizations provide training for staff and contract inspectors, addressing changes and updates to the regulations to provide a basis for consistency and integrity in certification. Certifiers provide specific training to ensure that the contract inspectors they work with are familiar with the forms, procedures, and processes of their agencies. Training resources include the International Organic Inspectors Association (IOIA), the American National Standards Institute (ANSI), the International Organization for Standardization (ISO), the Accredited Certifiers Association (ACA), state agency-sponsored investigative trainings, and others.

Inspectors may be independent contractors working for one or more certifiers, or they may be directly employed by a certifier. Most certifiers have policies stating minimum qualifications for contracted and staff inspectors and may be responsible for the initial training of an inspector. However, independent contractors are responsible for establishing their own knowledge base, maintaining their knowledge, and keeping their expertise current through continuing education. Such diverse backgrounds and training schemes make for an inconsistent baseline of knowledge and practice, exposing the certification system to potential weaknesses.

In an April 2012 memo to certifiers, the NOP recognized the vital role inspectors play in ensuring organic integrity. The memo reminded certifiers of the importance of a rigorous hiring and selection process when considering inspection personnel. The NOP noted plans to release draft guidance covering the qualifications necessary for inspectors and reviewers, however, guidance was not published.

In 2011, NOP entered into a contract with IOIA to further describe baseline qualifications and continuing education of inspectors. In using this work, in early 2018 the ACA developed a best practices document for organic inspector qualifications. Both have provided valuable insight into the development of this discussion document.

III. RELEVANT AREAS OF THE RULE AND RELATED DOCUMENTS

[205.501\(a\) General requirements for accreditation.](#)

(a) A private or governmental entity accredited as a certifying agent under this subpart must:

- (1) Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part;
- (4) Use a sufficient number of adequately trained personnel, including inspectors and certification review personnel, to comply with and implement the organic certification program established under the Act and the regulations in subpart E of this part;
- (5) Ensure that its responsibly connected persons, employees, and contractors with inspection, analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.
- (6) Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services;

[NOP Memo to Accredited Certifying Agents: Criteria and Qualifications for Organic Inspectors, April 2012](#)

[NOP 2027, Instruction: Personnel Performance Evaluations, March 2017](#)

[CACs Proposal: Personnel Performance Evaluations of Inspectors, April 2017](#)

[Accredited Certifiers Association Guidance on Organic Inspector Qualifications, February 2018](#)

IOIA Criteria for Inspectors and Reviewers working for NOP Accredited Certifying Agencies, November 2011 (See Appendix 1)

IV. DISCUSSION

Inspector qualifications can be broken down into several distinct areas:

1. Knowledge

Inspector knowledge includes proficiency in inspection & auditing techniques; strong understanding and knowledge of the USDA organic regulations; understanding of organic certification and inspection processes; and familiarity with the documents and procedures of the certifier whom they represent. It is essential this knowledge base be in the scope and scale of production in which the inspector is working.

2. Skills

Essential skills include keen observation; clear communication in spoken and written form as well as an ability to articulate regulations and requests for information; a high level of organization; and strong investigative skills. As much as an inspector must be able to communicate and observe, they must also know how to read a situation and interviewee, to listen and to allow an operator the space to convey answers to questions and the knowledge they hold of their operation.

Other skills and abilities vital to the inspector's role are a code of honest and ethical work practice; diplomacy; impartiality; and an overall professional approach to their work.

3. Experience

An inspector must have experience inspecting the specific scope of operations to which they are assigned. For example, while an inspector may have experience with and deep knowledge of poultry operations, they may have little experience in other production under the livestock scope such as dairy, beef, or goats, production systems with unique aspects.

Similarly, an inspector may have experience evaluating small flocks of birds or several cows on a diversified farm. But they may not have had the experience of evaluating large-scale production systems with multiple barns or larger herds. Thus, they should not be assigned or accept work evaluating these operations until they have gained the capability and training to do so.

Mentorships, though often challenging for independent inspectors to arrange, can provide a pathway for gaining experience.

Such experience also applies to handling operations. An inspector may have experience verifying small production lines, value-added on-farm processing, or basic multi-ingredient products. However, applicable skills and experience are necessary for tracing back complex supply chains across multiple handlers and geographical trade boundaries and navigating the varying standards and protocols these supply chains entail.

4. Training (Initial and Continuing)

Training can come in a variety of ways and often ties directly to experience gained working in other roles in the organic sector. Though valuable, related experience does not supplant the need for intensive, inspection-specific training. Additionally, training does not end once initial proficiencies are reached and deemed sufficient. As in any profession, investment in continuing education is crucial to keeping current with evolving regulations, technologies, and trade.

Prior to taking the lead on inspections, an inspector must know the scope of operation; be educated in the tenets of auditing; be deeply familiar with the relevant regulations; and have familiarity with the certifier's procedures and forms. Only when these minimum qualifications have been met should an inspector begin in-field training and evaluation.

As noted above, a variety of resources exist to provide initial training in organic inspection, and the Subcommittee encourages referencing these for greater detail in establishing minimum baselines. Additionally, certifiers provide training of their own, often coupling in-house training with independent training, and then following with shadowed or mentored inspections with seasoned staff. However, as noted above, there is a lack of mentorship opportunities for the independent inspector seeking to gain direct experience in the field.

Continuing education can take the form of advanced in-person training or webinars to increase competency in areas such as complex trace back and mass balance audits, and updates to regulations that require additional evaluation methods. No matter the method, continuing education must be a part of maintaining and improving professional competence in the field.

5. Evaluation

Evaluation is essential to both the beginning inspector and the inspector with many seasons and varieties of operations under their belt. For the beginning inspector, evaluation should be incorporated in initial training so that productive feedback may be offered, positive practices reinforced, and areas for improvement identified. Especially helpful is coordinating inspections with seasoned inspectors with experience in the scope and scale inspected so that a new inspector may shadow, partner, and then lead on inspections while training. This provides opportunity for feedback and support as the inspector becomes comfortable and competent in their role.

An earlier proposal, Personnel Performance Evaluations of Inspectors, was discussed at the Spring 2017 NOSB meeting and addressed criteria for the field evaluation of existing inspectors.

V. RECOMMENDATIONS

The Subcommittee recommends the National Organic Program develop minimum qualifications and training, and continuing education guidelines to ensure a professional and competent inspector pool to meet the demands of ever-evolving and complex organic supply chains. These should include considerations of the criteria included above in the Discussion area of the document. The Subcommittee encourages the program to use existing resources in this area.

VI. REQUEST FOR PUBLIC COMMENT

The NOSB is requesting public comment from the community on the following questions:

- Are the criteria and qualifications laid out in the ACA Best Practices for Inspector Qualifications sufficient to establish a baseline for inspector competency? What changes do you suggest?
- What other resources are available to train new and seasoned inspectors?
- Should there be a licensing system for inspectors by scope and/or scale in recognition of their specific skills? How do you think such a system should work?
- While this document focuses on inspectors, what other roles should the CACS consider (e.g., initial and final reviewers as well as other certifier personnel)?

- What models from other industries that facilitate high quality personnel through training and oversight could the organic industry emulate?

Subcommittee vote

Motion to approve this discussion document on inspector qualifications

Motion by: Harriet Behar

Seconded by: Ashley Swaffar

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

Approved by Scott Rice, CACS Chair, to transmit to NOSB February 26, 2018

Appendix 1

Task 1

**Criteria for Inspectors and Reviewers working for
NOP Accredited Certifying Agencies**

Revision November 6, 2011

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1. Overview

These proposed ACA Inspector and Reviewer Criteria reflect the maturing of the organic sector domestically and worldwide. The professions of organic inspector and reviewer are barely thirty years old. While recognizing the variation in ACAs (private, state) and of work arrangements (contractual, full time, part-time), **these proposals address the need for consistency inherent in a regulatory environment, while recognizing the tremendous diversity throughout - and fundamental to - the organic sector.**

In this document, ACA Inspector and Reviewer Criteria are considered within the four scopes of the National Organic Program (NOP) Regulations, i.e., crop production, wild crop harvesting, livestock production and handling.

Section 2 describes the responsibilities of organic inspectors. Specific knowledge, skills, abilities and personal attributes for organic inspectors are discussed. Specific work place experience, training and inspection experience are also recommended. Based on these criteria, Performance Evaluation Standards are then set forth. Finally, examples of Professional Development Activities are listed.

Section 3, similarly, describes criteria for Initial Reviewers and Final Reviewers, followed by specific knowledge, skills, abilities, personal attributes, work place experience, training and review experience. Section 3 concludes with Performance Evaluation Criteria and Professional Development Activities for reviewers.

Section 4 defines specific terms for the reader.

Section 5 is based on the Organic Food Production Act of 1990, the NOP Regulations, numerous published guidance and policy documents, as well on the work of non-profit organizations with considerable expertise in the field.

Appendix, Section 6 suggests guidelines for preparation, inspection and reporting time for various inspections.

2. Inspectors

2.1 Inspector Responsibilities (Key Activities)

Organic inspections are an evidence-based and standards-based verification of the accuracy of the Organic System Plan to verify whether or not the Organic System Plan is implemented and to determine whether production/handling operations and inputs used are in compliance with NOP Regulations.¹

Scopes of inspections are crops, wild crop harvesting operations, livestock operations or handling (processing) operations. Throughout the inspection, the inspector is gathering information by interviewing personnel, observing production/handling practices, and verifying records. Each step of the way, information is assessed against the applicable standards and issues of concern are identified.

Inspections can be broken down into the following tasks:

1. Review file and assignment from Accredited Certifying Agent (ACA); prepare an inspection plan and make arrangements with operator, taking care to schedule the inspection at a time in the production cycle when organic operations can be observed²;
2. Conduct an opening interview with the operator and relevant personnel (includes verifying scope of inspection, operator understanding of ACA forms, etc.)³
3. Verify accuracy of OSP and all other information supplied by operator, with particular attention to areas where organic integrity is at risk (i.e., buffers, inputs). Verify production/handling capacity of the operation (yield estimates) and conduct on-site inspection of in/out balance and traceability⁴;
4. Verifying label and packaging;
5. Clarify issues of concern which were identified in the pre-inspection review;
6. Assess corrective actions taken to address minor non-compliances for certified operators⁵;
7. Identify and summarize areas of potential non-compliance⁶;
8. Identify and communicate additional information to be submitted by operator⁷;
9. Gather samples, provide inspected party with a receipt and maintain chain of custody⁸;
10. Conduct and document an exit interview with the operator according to NOP Regulations and ACA procedures⁹;
11. Communicate the findings to the ACA according to ACA procedures¹⁰.

In addition, the following tasks are to be carried out by the inspector:

For organic crop producers:

Evaluate soil management, assess adjoining land use, assess buffer zones; review land history, assessing production capacity of the land, evaluate seeds and planting stock used, examine crop rotation practices, assess pest control practices, assess harvest, labeling and shipping procedures.

For organic wild crop harvest producers:

Evaluate designated harvest areas, sustainable harvest practices, and procedures that ensure an adequate audit trail.

For organic livestock producers:

Inspectors evaluate soil management, adjoining land use, buffers, land history, production capacity of the land, seeds and planting stock used, health care practices, origin of livestock, livestock living conditions, conditions for temporary confinement of livestock, and pasture management practices.

For organic handlers:

Evaluate receiving, processing, pest control, storage, labeling and shipping, as well as practices to prevent commingling and contact with prohibited substances.

For split¹¹ operations (operations that handle both organic and non-organic):

NOP 205.100, NOP 201(a)(5) and NOP 205.400(c) specifically describe that on split operations, 'the inspector must inspect non-certified production and handling areas, structures and offices to assess:

- 1) the potential for commingling;
- 2) steps taken to prevent commingling and contact with prohibited substances and
- 3) if any non-organic or contaminated products are being sold as organic.

Most inspections are regular annual inspections, either of first-time operators or of certified operators¹² going through the annual renewal process. In the organic inspection system, annual inspections are full inspections, which cover every aspect of the production/handling operation regulated by the organic standard. At the request of the ACA, an inspector may also conduct a follow-up inspection, which has a more limited scope. These typically focus on previously identified non-compliances and issues of concern, or a change in the operation (i.e. addition of new acreage or production line). Finally, inspectors may conduct unannounced inspections, on operations selected by the ACA based on particularly high risk levels, complaints, or other parameters established by the ACA, including random selection and fulfillment of ACA accreditation requirements¹³.

Because organic certification is not only about end products, organic inspection involves understanding and assessing entire production systems and processes¹⁴, which can be very complex and time-consuming. Some examples of simple to highly complex operations are in Appendix 1, with estimated inspection times indicated for each example. It is recommended that beginning inspectors not be assigned highly complex inspections until inspection experience is gained and a certain proficiency is mastered.

Most inspectors work individually. Teams may be assigned for particularly adverse compliance situations where additional witnesses may be desirable.

2.2 Recommended Requirements

Recommended requirements for inspectors depend on the complexity and scope of the operations being inspected (crop, wild crop, livestock and handling).

2.2.1 Knowledge

There are six bodies of knowledge and facts required of organic inspectors.

- a. Regardless of the type of inspection (crop, wild crop, livestock, handling), a good understanding of inspection (auditing) techniques and protocols is required¹⁵.
- b. Inspectors must have a demonstrated understanding of organic certification and inspection processes¹⁶, knowing their role and limitations within them.
- c. Specific to the inspection category, a demonstrated understanding of the applicable organic regulations (CFR Title 7 Part 205 NOP and OFPA) are required. This does not just mean knowing what the regulations say and where to find it, but most importantly, how to apply the regulations to practical situations. The inspector must be able to explain applicable standards and certification procedures to the operator.
- d. A good understanding of production/handling processes is a critical requirement. Having a good knowledge of current practices in the operators' conventional counterpart is a necessary tool for organic inspectors, enabling effective identification of risks to organic integrity in the organic production/handling process.
- e. Inspectors should be proficient – and current – in their understanding of the specific procedures, documentary requirements and forms of the ACA¹⁷ for whom they work. ACAs each have their own ways of gathering organic product recipes, input profiles, or finished product labels.
- f. Organic inspectors should be aware of other rules and regulations applicable to the inspection category, notable food safety requirements¹⁸. Although such regulations are technically beyond the scope of organic inspections, if the organic inspector observes obvious violations of them, they are typically addressed in an addendum to the inspection report, for the ACA's attention.

2.2.2 Skills (areas of expertise)

Nine key skills (areas of expertise) are needed to conduct organic inspections and enable the organic inspector to fulfill inspection assignments effectively and efficiently.

- a. **Observation skills:** When conducting evidence-based inspections, a significant part of the on-site time is spent in the field or on the production floor, understanding the 'big picture' of a production system and observing the details which support (or contradict) the Organic System Plan.
- b. **Communication:**
 1. **Interviewing** is a technique inspectors use to gather information so appropriate interviewing techniques are required. Some good interview techniques are ¹⁹

asking open ended questions, asking the same question a different way and paraphrasing.

2. **Documenting/writing**²⁰: This includes correct grammar and spelling; accurate writing that is clear, concise, and easily understood by the operator and reviewer; facts vs. opinion; reference supporting documentation; citation of appropriate NOP regulations; and explanation of issues of concern.
 3. **Active listening**: Active listening is a structured way of listening and responding. The elements of active listening are comprehending, retaining, and responding. The listener asks questions and paraphrases back to the speaker to clarify understanding. Listening carefully to operator responses reduces redundancy during the inspection, improves accuracy, and shows respect.
- c. **Intermediate Math skills**: Inspectors need to be able to convert easily from one unit of measure to another, calculate yields, calculate annual feed requirements in livestock operations, use formulas to verify in/out balances, and use percentages to validate recipes and production reports etc.
 - d. **Organization skills and time management**²¹: managing preparation time, travel time, on-site time (e.g., multiple sites) and reporting time efficiently; respect ACA deadlines; use travel resources efficiently. Inspectors need to plan well, be prepared²², and be on-site at a time when organic operations can be verified²³. The inspections must be conducted with the authorized operator representative is present, moving smoothly from one area of operations to another.
 - e. **Information management** and basic computer skills²⁴ are required skills for inspectors, both in the office and on-site. Specific risks and conditions to certification are flagged in the preparation before inspection; these areas must be properly investigated, observations noted in an orderly way, and conclusions communicated to the ACA. Evidence of potential non-compliances must be substantiated, documented, tracked and accurately reported. Working documents need to be appropriately kept secure, archived and/or destroyed²⁵. Demonstrated proficiency in word processing, use of spreadsheets and data base management is required.
 - f. **Investigative skills**²⁶ are required for all inspections, and especially those where the inspector finds inconsistencies during the on-site inspection (i.e., if prohibited substance use is suspected), when conducting complaint related inspections and in cases of suspected fraud.
 - g. **Sampling procedures**: Correct sampling methods, appropriate handling of samples (packing, labeling, shipping) and proper chain of custody impact the validity of test results. These activities must be done according to the ACA's contracted laboratory procedures.
 - h. **Skills specific to inspection scope**: Additionally, numerous skills specific to the scope of the inspection are required. The following table gives several examples for each scope but this list is by no means exhaustive.

Inspection scope	Examples of skills specific to inspection scope
Crop	<ul style="list-style-type: none"> - able to recognize weed species and assess impact - able to assess soil structure and fertility, by consulting soil test results, observing crop performance and observing signs of compaction, good tilth etc. - able to assess possible sources of contamination and recognize signs of pesticide injury to crops or other vegetation²⁷ - able to use GPS to validate field sizes and boundaries -able to assess crop rotations and management of pasture as a crop - able to evaluate farm inputs -able to evaluate manure and compost management
Wild crop	<ul style="list-style-type: none"> - able to assess sustainability of harvesting practices - able to read maps - able to recognize possible source of contamination and signs of damage to wild crops or other vegetation - able to determine damage to harvested crop and dependent species (plant and/or animal) by harvesting or over-harvesting²⁸
Livestock	<ul style="list-style-type: none"> - able to calculate dry matter intake for ruminant animals - able to assess native and tame pasture production - able to assess overall condition of herd/flock (animal behavior, physical appearance - able to asses adequate nutrition and evidence of malnutrition or parasites etc.)²⁹ - able to evaluate synthetics used - able to assess the general animal husbandry practices used for species on operation - able to assess input for farms with livestock - able to assess feed handling procedures to avoid contamination on split operations
Handling	<ul style="list-style-type: none"> - able to compare proposed recipes, actual production and finished product labels - able to verify compliance of organic ingredients, non-organic ingredients, food additives and processing aids - able to assess compliance of facility pest management protocols - able to assess equipment for commingling or contamination potential - able to assess label compliance - able to identify and report major and obvious food safety concerns³⁰

2.2.3 Abilities (capacity, talent)

Beyond knowledge and specific skills, it is recommended that organic inspectors develop certain abilities to facilitate their work:

- a. attention to detail without losing sight of the whole
- b. able to differentiate between inspection and advice³¹
- c. discernment³²: differentiate between evidence and opinions³³ judgment to interpret and adapt general guidelines to specific situations
- d. analytical
- e. accuracy³⁴
- f. consistency
- g. awareness of trends and developments in conventional and organic aspects of agriculture or food science

- h. self-assessment: can recognize own opportunities for improvement, can accept constructive criticism

2.2.4 Personal Attributes

Inspectors should possess personal attributes³⁵ to enable them to perform inspections in accordance with principles of auditing. An inspector should be:

- a. Honest and ethical. Integrity of the certification system rests on the integrity of its players, including inspectors and reviewers. In quality systems, inspectors must be free of conflicts of interest with the operations for which they inspect. Conflicts of interest are declared annually³⁶ and inspectors should defer any inspection assigned to them by an ACA with which they have a conflict of interest. Confidentiality³⁷ is also important. Information learned about operations must be kept confidential in order to gain trust of operators and not be used by inspectors for personal gain. Inspectors also have a responsibility to report suspected fraud.
- b. Impartial and non-discriminatory: Inspectors should be fair and objective³⁸ during inspections and when reporting their observations to ACAs. Inspectors should be open-minded to the types of people and management strategies they encounter. They need to treat all operators with respect and without bias. An inspector should also be aware of the cultural environment in which he/she is working.³⁹
- c. Professional in their conduct. Inspectors must be fit and in good mental health. As most inspectors work alone, they need to be self-reliant and able to function autonomously and decisively. During the inspection, the inspector represents an ACA and must follow ACA policies and procedures. They must follow all governmental laws that apply to their status, whether employees or contractors (ex. valid drivers license, liability insurance, reporting income, etc.) They should be punctual for appointments as well as meeting ACA deadlines. Inspectors should wear appropriate attire, pay attention to bio-security requirements, and have an awareness of personal safety. They should turn down work if too busy or if proposed assignment is beyond their realm of competence. Inspectors must be willing to travel and economical in their use of travel allowances.
- d. Curious and tenacious. Asking questions is an important method used by inspectors to gather information. They must be curious about the systems they are observing in order to ask appropriate questions. They also must be systematic and continue asking questions until they have a good understanding that compliance is met.
- e. Perceptive and versatile. Inspectors must be perceptive to quickly grasp an understanding of the variety of operations they encounter. They should have the flexibility to adjust to different situations and people.
- f. Diplomatic. Inspectors must strive to maintain a pleasant and non-confrontational atmosphere throughout the inspection even while asking difficult questions. The inspection can be an exhausting process for the operator because it covers many areas of his/her operation in a relatively short period of time and patience of the operator may wear thin.

- g. Support goals of organic farming and handling. This last personal attribute is important as the attitude of the inspector toward his/her work is evident to the operator during an inspection. A lack of support can undermine the authority needed by an inspector.

2.2.5 Work Experience

Organic inspectors should have a **minimum of one year work place experience in the category**⁴⁰ in which they will be inspecting. Examples of possible work place experience are given below:

Inspection category	Examples of work place experience
Crop	Growing up on a farm and actively participating in the daily and seasonal tasks Operate own farming operation Employment on farming operation Farm manager Educator at community college
Wild crop	Experience as harvester of wild crops Work in a field of natural resource management
Livestock	Growing up on a livestock farm and actively participating in the daily and seasonal tasks Operate own livestock farming operation Employment on livestock operation Livestock farm manager Herdsman Veterinarian or veterinary assistant Extensive 4-H or FFA experience Trainer at community college
Handling	Production worker in food processing facility Management or shift foreman Employment in food retail and/or preparation Research and development in food processing

2.2.6 Training

It is recommended that five kinds of training be required before beginning supervised inspection work:

1. Education in the category
2. General auditor training
3. Standards training
4. Specific organic inspection training
5. Training to ACA procedures and paperwork

Initially, this training will be intense and over an extended period of time. As inspection experience is gained, training will take the form of refresher courses or specialty modules. This is summarized in the table below; in the table, 'category' refers to crop, wild crop, livestock or handling:

Recommended training requirements	Inspector⁴¹	Licensed Inspector	Master Inspector
Sector education	College degree in agriculture or food science or related field, or relevant work place experience	Training in related discipline 10 hrs/yr	Training in related discipline 7 hrs/yr
Auditor training	ISO auditing overview (1-2 hrs)	Relevant training from private training providers 15 hrs/yr (suggested, not required)	Lead auditor training 40 hrs (suggested, not required)
Standards training	Basic standards training Crop (6 hrs) Livestock (6 hrs) Wild crop (4 hrs) Handling (8 hrs)	Annual update to standards and national list 1-2 hrs per category per year, depending on changes which have been adopted	Annual update to standards and national list 1-2 hrs per category per year, depending on changes which have been adopted
Organic inspection training	Basic organic inspection training in appropriate category(level 100) 4.5 days/category ⁴² Field Training with mentor (3 supervised inspections and 7 supervised inspection reports) ⁴³	Intermediate organic inspection modules related to appropriate category (level 200) 10 hrs/yr	Advanced organic inspection modules related to appropriate category (level 300) 3-5 hrs/year
ACA procedures and paperwork training	Training to ACA procedures	Annual update to ACA procedures	Annual update to ACA procedures

2.2.7 Inspection Experience

Only in exceptional circumstances can a perfect combination of knowledge, skills, abilities, personal attributes, prior work experience and training be sufficient to autonomously conduct organic inspections. Some ACAs ensure that new inspectors are mentored by experienced inspectors. Inspections are conducted by the apprentice under supervision of the mentor; exit

interview documents and reports are written by the apprentice but approved and co-signed by mentor.

Furthermore, it is recommended that beginning inspectors should only be assigned simple inspections, Licensed inspectors can be assigned simple and intermediate inspections, and only Master inspectors should be assigned inspections at all levels of complexity. ACAs might occasionally need to assign a lower level inspector, but these deviations should be rare. ACAs should have a systemic way to document the level of inspector and the corresponding level of complexity of the operations they have been assigned. In this way, operators will work with inspectors sufficiently trained for their type of operation, inspections will be efficient, and organic compliance issues will be systematically addressed.

Finally, only Master inspectors would have the qualifications to mentor apprentices.

	Inspector	Licensed Inspector⁴⁴	Master Inspector
Inspection Experience	Field training (three supervised inspections and 7 additional inspection reports reviewed by a supervisor/mentor) per category	Have demonstrated proficiency in simple inspections in appropriate category, 10 unsupervised inspections per category	Have demonstrated proficiency in simple and medium inspections in appropriate category over a period of 2 years or 30 inspections per category Can mentor apprentices.

Notes:

- Category refers to crop, wild crop, livestock or handling
- In cases where a single inspection takes several days, length of experience can be expressed as time rather than in number of inspections, where 1 inspection = 0.5 days on-site inspection

2.3 Recommended Performance Evaluation Standards

Annual performance evaluations contribute to the continuous improvement of inspectors as well as being a requirement pursuant to the NOP Final Rule, 205.501(a)(6) and 205.510(a)(4). Observation during inspection by a representative from the ACA would be periodic but not necessarily annual. Observation during inspection may also include an inspection witnessed by a peer (another inspector).

	Area of competence to be evaluated	Evaluation criteria	Evaluation method
2.1 Responsibilities	Review file and assignment from ACA; prepare an inspection plan and make arrangements with operator, taking care to schedule the inspection at a time in the production cycle when organic operations can be observed	Inspection well-prepared (audit plan, checklist for use during inspection) Inspection appropriately scheduled	Feedback from operators Observation during inspection Interview inspector
	Conduct an opening interview with the operator and relevant personnel	Opening interview covers essential elements (scope, audit plan, safety/bio-security, confidentiality, verifying accuracy of information provided by operator etc.)	Observation during inspection

	Area of competence to be evaluated	Evaluation criteria	Evaluation method
	Verify accuracy of OSP and all other information, with particular attention to areas where organic integrity is at risk (buffers, inputs, split operations)	Organic Control Points systematically verified. Materials appropriately reviewed.	Observation during inspection Review of inspection report
	Verify production/handling capacity (yield estimates); conduct on-site inspection of in/out balance and traceability	Record keeping system assessed. Random trace back conducted. In/out balance completed.	Review of inspection reports Observation during inspection
	Verifying label and packaging	Labels and packaging verified.	Review of inspection reports Observation during inspection
	Clarify issues of concern which were identified in the pre-inspection review.	Issues of concern which were identified in the pre-inspection review are clarified.	Review of inspection reports Observation during inspection
	Assess corrective actions taken to address minor non-compliances for certified operators.	Previous conditions reviewed and verified.	Review of inspection reports Observation during inspection
	Identify and summarize areas of potential non-compliance	Potential areas of non-compliance identified and summarized.	Review of inspection reports Observation during inspection
	Identify and communicate additional information to be submitted by operator.	Missing information identified and communicated.	Review of inspection reports Observation during inspection
	Gather samples, provide receipt, maintain chain of custody, and according to ACA procedures	Samples gathered as per ACA and contracted laboratory procedures.	Review of inspection reports Observation during inspection
	Conduct and document an exit interview with the operator according to ACA procedures	Exit interview conducted, covering all essential elements.	Review of inspection reports Observation during inspection
	Communicate the findings to the ACA according to ACA procedures.	Report filed punctually. Report well-written, clear, concise and needing no further information from inspector.	Review of inspection reports
2.2.1 Knowledge	Auditing techniques protocols	Auditing protocols followed.	Review of training record, course content and result Observation during inspection
	Organic certification and inspection processes	Certification and inspection procedures understood and followed.	Observation during inspection.
	NOP regulations	Organic requirements understood; could clearly	Review of training record, course content

	Area of competence to be evaluated	Evaluation criteria	Evaluation method
		explain to operator.	and result Review of inspection reports Observation during inspection
	Organic (and conventional) production and handling processes	Understands system being inspected; using terminology specific to system being inspected; thorough assessment of Organic Control Points.	Review of training record, course content and result Observation during inspection
	ACA procedures	Uses ACA forms correctly. Follows ACA procedures.	Review of training record, course content and result Review of inspection reports Feedback from reviewers
	Related laws and regulations.	Asks questions and makes observations during inspection pertaining to related laws and regulations. Accurately reports findings.	Review of training record, course content and result Observation during inspection Review of inspection report
2.2.2 Skills	Observation	Attention to detail Relevance of questions	Observation during inspection
	Communication: Interviewing Documenting/writing Listening	Use of open-ended questions, paraphrasing Correct grammar, spelling Accurate, clear, concise Active listening	Observation during inspection Review of inspection reports
	Evaluation	Analyzes data, draws conclusions based on evidence, identifies and assesses OCPs	Observation during inspection Review of inspection reports
	Math	Verification of rations, DMI, recipes etc. Verification of in/out balances Logical analysis of results	Review of training record, course content and result Review of inspection reports
	Organizational skills and time management	Plans well Punctual In control of agenda Efficient	Observation during inspection Review of time began and time ended inspection Submission of inspection report
	Information management	Well organized Prepared - and uses - checklists Demonstrate appropriate computer skills	Observation during inspection Review of inspection report
	Investigative skills	Asks good questions.	Observation during

	Area of competence to be evaluated	Evaluation criteria	Evaluation method
		Is inquisitive. Documents findings. Evidence based approach.	inspection Review of inspection report
	Sampling procedures	Samples gathered as per ACA and contracted laboratory procedures. Maintains sample integrity and chain of custody.	Review of training record, course content and result
	Skills specific to inspection scope (see examples in table 2.2.2.i)	Demonstrates competence specific to inspection scope	Observation during inspection Review of reports Feedback from operators
2.2.3 Abilities	Attention to detail	Satisfactory performance: reviewers do not need to get further information from the inspector, inspection paperwork is clear and complete as submitted	Observation during inspection Review of reports Feedback from reviewers
	Able to differentiate between inspection and advice	Does not provide advice to the operation; does not assist operators to overcome barriers to certification	Observation during inspection
	Discernment	Demonstrates good sense of judgment; shows ability to interpret and adapt general guidelines to specific situations	Observation during inspection Review of reports
	Analytical	Demonstrate logical approach	Observations during inspection (specifically traceability tests)
	Accuracy	Absence of error	Review of reports Feedback from operators
	Consistency	Methodical approach	Review of reports Feedback from reviewers
	Awareness of trends and developments in conventional and organic – aspects of agriculture or food science	Appears to be up to date and knowledgeable	Review of training records
	Capacity for self-assessment	Open to constructive criticism Pro-active in seeking additional training opportunities	Annual performance review
2.2.4	Integrity, confidentiality, freedom from conflict of interest, ethical,	Satisfactory performance Declarations kept current	Feedback from operators

	Area of competence to be evaluated	Evaluation criteria	Evaluation method
Personal attributes	open-mindedness, diplomacy, observant, perceptive, versatile, tenacity, decisiveness, self-reliance, punctuality; does not provide advice for inspected operations; professional in their conduct at all times; confidential; be fit and in good mental health; economical in their use of travel allowances; cultural sensitivity, willing to travel	(confidentiality, C of I)	Observation during inspection Review of complaints filed naming the inspector Review of annual documentation

2.4 Recommended Professional Development Activities

There are a wide range of professional development activities in which organic inspectors should participate. They should be documented and included in their résumé, supported by course certificates and content lists whenever possible. This is a partial list of possible professional development activities:

- Conferences
- Workshops
- Community college and university courses
- eOrganic webinars
- ATTRA
- On-farm demonstrations
- Subscriptions to trade magazines
- Independent study/reading
- Networking⁴⁵ (professional associations, listserves, etc.)
- Peer review: the IOIA 2010 survey refers to these as 'witness audit with peers'. This concept rates highly as an additional element for inspector accreditation (licensing).
- Performance review from certifiers: Per NOP regulation and accreditation requirements, ACAs must conduct an annual performance review of their inspection staff/contractors. At a minimum, reports, training records, feedback from operators, and complaints naming the inspector must be reviewed. Additionally, it is recommended that periodically (not every year) a qualified ACA representative accompany the inspector on an inspection and assess their performance, then meets with the inspector to give verbal and written feedback and discuss opportunities for improvement.
- Private coaching
- IOIA 200 level courses and 300 level courses⁴⁶ (IOIA Training Institute) (advanced and specialty modules)
- IOIA training modules with tests⁴⁷

Content lists for training activities are presented in Task 2.

3 Reviewers

3.1 Reviewer Responsibilities (Key Activities)

There are two levels of review in the organic certification system: initial review⁴⁸ (pre-inspection) and final review/certification decision (post-inspection)⁴⁹. Initial review may be done by the same person as inspection, but the final certification decision, including identification of noncompliances, must not be made by the same person who did the initial review or inspection⁵⁰. Depending on ACA procedures, the final reviewer makes the certification determination or the certification determination can be made by a different person, or even by a committee.

Initial Review

The initial reviewers' primary role is to verify, through thorough document review, whether or not the Organic System Plan (OSP) as submitted by the operator is complete and accurate⁵¹, has the potential to be in compliance with NOP Regulations and ACA requirements⁵², and is scheduled for on-site inspection⁵³. Additional information from the operator may be requested. The initial reviewer must verify that an operator who previously applied through another ACA and received a notification of non-compliance or a denial has addressed those issues⁵⁴. Initial reviewers may review applications and/or continuation of certification documentation for all four scopes (crop, wild crop harvesting, livestock, or handling).

Depending on the size and staffing of the ACA, initial reviewers may be generalists or may specialize in one production/handling sector or another. Initial reviewers may also consider requests for temporary variances, labels and market information, as well as important changes to the OSP which a certified operator may report between annual inspection dates. Initial reviewers may also evaluate inputs, although some ACAs may have specialized staff for this⁵⁵. Initial reviewers may prepare files for inspection and even do the inspection assignments, although these tasks may be performed by other administrative staff.

Final review

The final reviewers' primary role is to verify, through study of the OSP, exit interview document, inspection report and results of analyses for substances conducted, whether the operators' production/handling system should be certified, and whether any requirements for the correction of minor non-compliances must be made⁵⁶. Final reviewers may need additional information or clarification from the inspector regarding their inspection report⁵⁷.

Final reviewers communicate findings to operators, along with copies of inspection reports and any test results⁵⁸. Final reviewers must verify compliance of labels. Final reviewers also review corrective action, rebuttal, appeal and mediation documentation submitted by the operator⁵⁹. They may recommend or require a follow-up or unannounced inspection⁶⁰.

Final reviewers who make the certification decision monitor deadlines for non-compliance correction and denial, rebuttal, revocation or suspension of certification. Final reviewers may mentor reviewers and often provide inspector and inspection report evaluations to the ACA. In the overall structure of quality management systems, complaint management is often assigned to final reviewers or others in the certification decision team/department.

Initial and final review tasks can be summarized as follows:

Initial Review

1. Answer questions about certification, standards and materials, timeliness⁶¹.
2. Review OSP and supporting documentation for completeness and potential compliance⁶²:
 - in the case of growers, this includes, but is not limited to, review of land history, contamination risks, crop rotation, fertility management, seed and planting stock use, pest, disease and weed management, input materials⁶³, equipment, labeling⁶⁴, and types of records for compliance to NOP;
 - in the case of wild crop harvesters this includes but is not limited to, review of land history, contamination risks, sustainability, equipment, labeling⁶⁵, and types of records for compliance to NOP;
 - in the case of livestock operations, this includes but is not limited to, review of livestock living conditions, origins of livestock, feed composition and feed sources, pasture management, veterinary practices, and types of records for compliance to NOP;
 - in the case of handlers, this includes, but is not limited to, review of labels, product formulations, ingredient suppliers, facility pest management, sanitation materials, food additives, and types of record keeping for compliance to NOP.
3. If the operation was previously certified by another ACA, previous non-compliance issues need to be verified for resolution⁶⁶.
4. Communicate with operator for additional information as needed⁶⁷.
5. Prepare file for inspection, including special instructions if necessary (number of products to trace, number of input/output balances to conduct, for example) and previous report if applicable⁶⁸.
6. Assign inspector, matching competency, availability, absence of conflict of interest etc.⁶⁹
7. Inform operator of which inspector has been assigned and manage changes to assignment, if needed.
8. Monitor deadlines for continuation of certification⁷⁰: ensure operators update OSPs on time and ensure inspections are scheduled in a timely fashion etc.
9. Review temporary variance requests.
10. Review reported changes to OSP.
11. Process requests for approval of inputs.⁷¹

Final review

1. Review OSP and supporting documentation, exit interview documentation, inspection reports and the results of any analyses for substances conducted.
2. Communicate with inspector for further clarification if needed.
3. Communicate with operator for additional information, if needed.
4. Provide copy of inspection report to operator⁷².
5. Provide copy of laboratory results (if applicable) to operator⁷³.
- 6a. Grant certification including requirements for the correction⁷⁴ of identified minor non-compliances within a specified period of time⁷⁵ and a consistent manner;
or
- 6b. Issue notification of non-compliance (or even notification of denial, in accordance with the requirements of the NOP regulations),⁷⁶ including the evidence and date by which the operator must rebut or correct each non-compliance.
7. Review rebuttals and responses to non-compliances and determine if compliant.
8. Monitor deadlines for corrective actions, follow-up inspections etc; communicating with operators when there are missed deadlines.

9. Require follow-up inspections if necessary.
10. Issue certification certificates.
11. Communicate decision (including any requirements for the correction of minor non-compliances) back to inspector⁷⁷.
12. Notify the NOP in cases of certification denial, and notices of noncompliance, proposed suspension or revocation⁷⁸.
13. Verify compliance of finished product labels.
14. Contribute to performance review of inspectors in conjunction with human resources personnel.
15. Contribute to performance review of initial reviewers in conjunction with human resources personnel.

Peripheral responsibilities for reviewers

- provide information to potential and actual organic operators
- ensuring maintenance of quality system and of the ACAs accreditation⁷⁹
- contribute to ACA policy development
- participate in educational programming of ACA
- represent ACA at trade shows, conferences, industry events
- contribute to optimizing the certification services
- contribute to continuous improvement of inspection services
- mentor and train initial reviewers (and inspectors)

3.2 Recommended Requirements

3.2.1 Knowledge

Not unlike the position of organic inspectors, there are five bodies of knowledge and facts required of initial and final reviewers:

- a. Regardless of the certification category (crop, wild crop, livestock, handling), a good understanding of accreditation⁸⁰, certification and quality systems is required⁸¹.
- b. Specific to the certification category, a good understanding of the NOP Regulations (CFR Title 7 Part 205 NOP and OFPA) is also required⁸². This does not just mean knowing what the standard says and where to find it, but most importantly, how to apply the standard to practical situations. The reviewer must also be able to explain applicable standards (and certification procedures) to the operator, when questions arise..
- c. Very specific to the file under review, a good understanding of organic **production/handling processes** is a critical requirement. Having a good knowledge of current practices in the operators' conventional counterpart is also an excellent tool for reviewers, enabling effective identification of risks to organic integrity in the organic production/handling process. Understanding the specific terms and jargon specific to the field under review is essential.
- d. Reviewers must be proficient – and current – in their understanding of the **specific procedures, documentary requirements and forms of the ACA**⁸³ which employs them or of every ACA which they contract to⁸⁴. ACAs each have their own document control system, their own specific procedures for reviewing OSPs and supporting

documentation, and prescribed ways of gathering organic product recipes, input profiles, or finished product labels. They have different ways of documenting changes to operator documents - and these processes change from time to time. Some ACAs have a data base for recording decisions, interpretations and precedents, which reviewers need to know how to use, input into and keep current. They need to know when they have the authority to make a determination and when they need to consult with other members of staff.

- e. It is recommended that organic reviewers be aware of **other rules and regulations applicable** to the inspection category, such as food safety requirements⁸⁵. Although such regulations are technically beyond the scope of organic inspections, when the organic inspector observes and reports obvious violations of them, reviewers need to know what is the appropriate action to take.

3.2.2 Skills

The recommended skills for initial and final reviewers are as follows:

- a. Computer skills/information management
- b. Organizational; project management
- c. Writing: correct grammar and spelling; concise and easy to understand by the targeted reader
- d. Good verbal communication
- e. Time management, meeting deadlines, following up on deadlines imposed on operators
- f. Meticulous: systematic about documenting and archiving conversations, emails, decisions etc.
- g. Intermediate Math skills: needed to verify feed rations and recipe formulations, etc.

3.2.3 Abilities

The recommended abilities for initial and final reviewers are as follows:

- a. Ability to work under pressure
- b. Ability to interface with operators, inspectors and other ACA staff
- c. Attention to detail⁸⁶
- d. Thorough, meticulous
- e. Analytical⁸⁷
- f. Accurate
- g. Consistency: making the same determination and decision in similar circumstances
- h. Reaches decisions in a timely manner based on logical reasoning and analysis
- i. Self-assessment: can recognize own opportunities for improvement, can accept constructive criticism

3.2.4 Personal Attributes

Initial and final reviewers should possess personal attributes⁸⁸ enabling them to handle a wide variety of situations in accordance with the requirements of an accredited quality system. A reviewer should be:

- a. Honest and ethical. Integrity of the certification system rests on the integrity of its players, including inspectors and reviewers. In quality systems, reviewers must be free of conflicts of interest with the operations they review. Conflicts of interest are declared annually⁸⁹ and reviewers must not review any operation's files with which they have a conflict of interest. Confidentiality⁹⁰ is also important. Information learned about operations must be kept confidential in order to gain trust of operators and not be used by reviewers for personal gain. Reviewers also have a responsibility to act on and investigate suspected fraud.
- b. Impartial and non-discriminatory⁹¹. Reviewers should be fair and objective, and review operator files consistently. They need to treat all operators with respect and without bias.
- c. Professional in their conduct. Reviewers represent ACAs and must follow ACA policies and procedures, including meeting deadlines.
- d. Diplomatic and tactful. Reviewers have a variety of contact with operators throughout the certification process, from answering certification questions, notification of initial review, additional information needed, decision making and identification of non-compliances and follow-up. This can be a trying process for operators, as their livelihood may depend on organic certification. Reviewers need to maintain a calm atmosphere in the office.
- e. Decisiveness. Both initial and final reviewers make decisions about additional information needed from the operator, whether inputs are approved, and whether previous non-compliances have been corrected. Final reviewers also make a decision regarding whether an operation is certified including identification of non-compliances. Consistency is needed as well as the ability to make those hard decisions.
- f. Support goals of organic farming and handling. This last personal attribute is important as the attitude of the reviewer toward his/her work is evident to the operator. A lack of support can undermine the authority needed by the ACA.

3.2.5 Work Experience

The recommended work experience required of reviewers varies from one ACA to another. Generally, ACAs require final reviewers to have demonstrated their competence as initial reviewers or as inspectors prior to moving into final review positions. As examples, the following table suggests some of the relevant work experiences possible for the two review levels:

Review level	Initial reviewer (pre-inspection)	Final reviewer (post-inspection)
Relevant work experiences possible	One or more years in professional office environment and/or quality assurance	One or more years in professional office environment and/or quality assurance
	Volunteering or interning on an organic farm	Auditing/regulatory compliance experience
	1-2 years in the production/handling sector ⁹²	1-2 years in the production/handling sector ⁹³
	1-2 years experience as an organic inspector	1-2 years experience as an organic inspector
		Demonstrated competence as an initial reviewer

3.2.6 Training

As with inspectors, the training required of reviewers falls into several different fields, notably:

- Sector (crop, wild crop, livestock, handling)
- Regulatory/quality system
- Organic inspection
- NOP Regulations
- Accreditation requirements
- ACA procedures, forms, data management

Recommended training requirements	Level of review	
	Initial (pre-inspection)	Final (post-inspection)
Sector education	Bachelors degree or higher in agriculture, food technology or related field, or equivalent work experience ⁹⁴	Training in related discipline 10 hrs/yr
Regulatory, Quality systems	Basic quality system auditing or organic inspector training ⁹⁵	Basic quality system auditing or organic inspector training
Standards training	Basic NOP Regulations training Crop (and wild crop) 6 hrs Livestock 6 hrs Wild crop (included in crop) Handling 6 hrs	Annual update to NOP Regulations and National List 1-2 hrs per category per year, depending on changes
Accreditation requirements	Training to NOP Accreditation and ISO 65	Update every 2 years
ACA procedures and paperwork training	Training to ACA procedures ⁹⁶	Annual update to ACA procedures

3.2.7 Reviewer Experience

- Entry level reviewers are not expected to have review experience; initially they are under supervision of experienced reviewer.⁹⁷
- Initial review work or organic inspection is often - but not always – a prerequisite for final review work

3.3 Recommended Performance Evaluation Standards

Annual performance evaluations are required⁹⁸. It is recommended that performance evaluation be conducted by peers (other review personnel) in conjunction with human resources staff. The following table suggests standards which such reviews can address.

	Area of competence to evaluate	Evaluation criteria	Evaluation method
3.1 Responsibilities: Initial reviewer	Answer questions about certification, standards and materials, timelines	Knowledgeable about standards, allowed substances, certification process	Review customer satisfaction
	Review application and supporting documentation for completeness and potential compliance (refer to narrative for detailed examples for each scope).	Incomplete applications and potentially non-compliant practices/materials are correctly flagged.	Sample files.
	If the operation was previously certified by another ACA, previous non-compliance (NC) issues need to be verified for resolution.	NCs from an operator's previous ACA are consistently verified for resolution.	Examine files of operators previously certified by another ACA.
	Communicate with operator for additional information as needed.	Operators are contacted for more information as needed.	Sample files.
	Prepare file for inspection, including special instructions if necessary and previous report if applicable.	Files are correctly prepared for inspector.	Inspector satisfaction. Sample files.
	Assign inspector, matching competency, availability, absence of conflict of interest.	Assignments are correctly made.	Sample files.
	Inform operator of which inspector has been assigned ⁹⁹ and manage changes to assignment if needed.	Changes in assignments are made according to ACA procedure.	Examine assignment records.
	Monitor deadlines for continuation of certification, ensure operators update OSP on time and ensure inspections are scheduled in a timely fashion.	Deadlines are respected.	Analyze performance.
	Review temporary variance requests	Temporary variance requests are processed according to ACA procedure.	Review records of temporary variances.
	Review reported changes to OSPs	Changes to OSPs are reviewed and processed according to ACA procedure.	Sample files.

	Area of competence to evaluate	Evaluation criteria	Evaluation method
	Process requests for approval of inputs	Input approval requests are processed according to ACA procedure.	Sample files.
3.1 Responsibilities: Final reviewer	Review OSP and supporting documentation, exit interview documentation, and inspection reports and results of analyses for substances conducted	Files are thoroughly reviewed. Review is documented.	Sample files.
	Communicate with inspector for further clarification if needed	Communications with inspectors are made when needed and documented.	Sample files.
	Communicate with operator for additional information if needed.		
	Provide copy of inspection report to operator	Reports are provided to operator.	Sample files.
	Provide copy of laboratory results (if applicable) to operator	Lab results are provided to operator.	Sample files.
	Grant certification including requirements for correction of identified minor non-compliances within a specified time and in a consistent manner OR Issue notification of non-compliance (or denial) including evidence and date by which operator must rebut or correct each non-compliance.	Decisions are made based on evidence, in a consistent manner and documented.	Sample files.
	Review rebuttals and responses to non-compliances and determine if compliance is met.	Rebuttals and responses are reviewed and assessed; conclusions are documented.	Sample files.
	Monitor deadlines for corrective actions, follow-up inspections etc; communicating with operators when there are missed deadlines	Deadlines are respected.	Analyze performance.
	Require follow-up inspections if necessary	Follow-up inspections are required when appropriate.	Sample files.
	Issue certification certificates	Accurate certificates are issued.	Sample files.
	Communicate decision (including any requirements for the correction of minor non-compliances) back to inspector.	Inspectors are notified of review outcomes.	Sample files.
	Notify the NOP in cases of certification denial and notices of proposed suspension or revocation	NOP is notified of certification denials, and of proposed suspensions and revocations.	Review files (internal audit).
	Verify compliance of finished product labels.	Labels are reviewed using checklist; review documented.	Sample files.
	Contribute to performance review of inspectors in conjunction with Human	Inspector performance evaluated using HR	Review files (internal audit).

	Area of competence to evaluate	Evaluation criteria	Evaluation method
	resources personnel	checklist.	
	Contribute to performance review of initial reviewers in conjunction with human resources personnel.	Initial reviewer performance evaluated using HR checklist.	Review files (internal audit).
	Peripheral responsibilities ¹⁰⁰		
3.2.1 Knowledge	Accreditation, certification and quality systems		Review of training record
	NOP Regulations	Demonstrates understanding of NOP regulations	Review of training record; observation at work
	Organic production/handling processes	Understands system being inspected; using jargon specific to system being inspected.	Review of training record
	ACA procedures and policies	Uses ACA forms correctly. Follows ACA procedures.	Review of training record Review of operator files
	Other applicable regulations		Review of training record
3.2.2 Skills	Computer skills/ Information management	Uses programs competently and efficiently.	Performance review.
	Organizational; project management	Is well organized.	Performance review.
	Writing: correct grammar and spelling; concise and easy to understand by the targeted reader	Writes concisely and uses language correctly.	Review of files.
	Good verbal communication	Makes her/himself easily understood.	Observation in workplace.
	Time management, deadlines, following up on deadlines imposed on operators	Manages deadlines effectively.	Performance review.
	Meticulous: systematic about documenting and archiving all conversations, emails, decisions etc	Keeps proper records of all communications etc.	Review of files.
	Math: needed to verify feed rations and formulations	Correctly asses rations, recipes.	Review of files.
3.2.3 Abilities	Ability to work under pressure	Stays calm and focused meets deadlines	Employee interview Review staff turnover
	Ability to interface with operators, inspectors and other ACA staff	Courteous, people skills	Analysis of complaints naming reviewer.
	Attention to detail	Works with attention to detail.	Review of files.
	Thorough, meticulous	Works meticulously	
	Analytical	Bases decisions on facts	Review of files.
	Accurate	Does not make mistakes.	Review of files.

	Area of competence to evaluate	Evaluation criteria	Evaluation method
	Consistent	Handles similar situations the same way.	Review of files.
	Reaches decisions in a timely manner based on logical reasoning and analysis	Evidence based decisions	Review of files
	Self assessment	Accepts constructive criticism Recognizes opportunities for improvement	Interview, annual performance review
3.2.4 Personal attributes	Tact, diplomacy; Impartiality and objectivity; Supporting goals of organic farming and handling; Professionalism: in presentation ACA values; Integrity: honesty, fairness and lack of bias; Confidentiality; free of conflict of interest disclosure report; Decisiveness: reaches decisions in a timely manner based on logical reasoning and analysis	Satisfactory performance Declarations kept current (confidentiality, C of I)	Feedback from operators Review of complaints filed naming the reviewer Review of annual documentation Observation at work

3.4 Recommended Professional Development Activities

Initial and final reviewers should participate in a wide range of professional development activities. They should be documented and included in their résumé, supported by course certificates and content lists whenever possible. This is a partial list of possible professional development activities:

- Conferences
- Workshops
- ACA training programs
- NOP ACA Training Programs
- University and community college courses
- eOrganic webinars
- On-farm demonstrations
- Subscriptions to trade magazines
- Independent study/reading
- Networking¹⁰¹ (professional associations, relevant listserv groups, etc.)
- Peer review
- Interface of review teams with inspector teams
- Performance review from certifiers (see previous section)
- Private coaching
- IOIA webinars, seminars and training activities
- ATTRA documents

Content lists for training activities are presented in Task 2.

4 Definition of Terms

Term	Definition	Source
Ability	capacity, power, cleverness, talent, mental power	Oxford American Dictionary 1999
ACA	Accredited certifying agents	
Area of operation	The types of operation: crops, livestock, wild crop harvesting or handling or any combination thereof that a certifying agent may be accredited to certify under this part.	NOP 205.2
Audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.	ISO 19011, 3
Audit in/out balance	Examination of production records, inventory reports, receiving (purchase) reports and sales summaries for the purpose of verifying whether or not sales of organic product reconcile with production and receiving (purchases).	
Audit trail	Documentation that is sufficient to determine the source, transfer of ownership, and transportation of any agricultural product labeled as '100% organic', the organic ingredients of any agricultural product labeled as 'organic' or 'made with organic(specified ingredients) or the organic ingredients of any agricultural product containing less than 70% organic ingredients identified as organic in an ingredient statement.	NOP 205.2
Certification (or certified)	A determination made by a certifying agent that a production or handling operation is in compliance with the Act and the regulations in this part, which is documented by a certificate of organic operation.	NOP 205.2
Certified operation	A crop or livestock production, wild crop harvesting or handling operation, or portion of such operation that is certified by an accredited certifying agency as utilizing a system of organic production or handling s described by the Act and the regulations in this part.	NOP 205.2
Certifying agent	Any entity accredited by the Secretary as a certifying agent for the purpose of certifying a production or handling operation as a certified production or handling operation.	NOP 205.2
Competence	Demonstrated personal attributes and demonstrated ability to apply knowledge and skills.	ISO 19011
Competent authority	The official government agency having jurisdiction.	Codex Alimentarius 2.2
Credentials	Evidence of a person's achievements or trustworthiness, usually in the form of certificates, references, etc.	Oxford American Dictionary, 1999
Immediate family	The spouse, minor children, or blood relatives who reside in the immediate household of a certifying agent or an employee, inspector contractor, or other personnel of the certifying agent. For the purpose of this part, the interest of a spouse, minor child, or blood relative who is a resident of the immediate	NOP 205.2

	household of a certifying agent or an employee, inspector contractor, or other personnel of the certifying agent shall be considered to be an interest of the certifying agent or an employee, inspector contractor, or other personnel of the certifying agent.	
Inspection	The examination of food or systems for control of food, raw materials, processing and distribution, including in-process and finished product testing, in order to verify that they conform to requirements. For organic food, inspection includes the examination of the production and processing systems.	Codex Alimentarius 2.2
Inspector	Any person retained or used by the certifying agent to conduct inspections of certification operators or certified production or handling operations.	NOP 205.2
Investigation	A systematic gathering of facts and evidence to support or refute an allegation.	NOP Online Training: <i>Investigating Complaints: What ACAs Should Know</i> , Compliance & Enforcement Branch, June 2009
Knowledge	Specific information; facts or intelligence about something	Oxford American Dictionary 1999
Material evaluation program	An organic certification or other program, independent from the crop producer or input manufacturer, with the expertise to verify compliance of inputs used in organic production and handling with NOP regulations. The expertise and approval of material evaluation programs will be a component of the NOP accreditation program. Approved material evaluation programs include NOP accredited certifying agents and the Organic Materials Review Institute (OMRI). ACAs and OMRI are audited regularly to evaluate their compliance with the NOP regulations and this policy.	NOP Handbook PM 11-4
Official accreditation	The procedure by which a government agency having jurisdiction formally recognizes the competence of an inspection and/or certification body to provide inspection and certification services. For organic production, the competent authority (official government agency having jurisdiction) may delegate the accreditation function to a private body.	Codex Alimentarius 2.2
Organic control point (OCP)	Any point or procedures in an organic production, processing or handling system where there is a high probability that improper control may cause, allow or contribute to the loss of integrity. OCPs are points where there is contamination or commingling risks to organic crops or products.	IFOAM/IOIA International Organic Inspection Manual, p 45
Organic production	A production system that is managed in accordance with the Act and regulations in this part to respond to site specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance and	NOP 205.2

	conserve biodiversity.	
Organic System Plan (OSP)	A plan of management of an organic production or handling operation that has been agreed to by the producer or handler and the certifying agent, and that includes written plans concerning all aspects of agricultural production or handling described in the Act and the regulations in subpart C of this part.	NOP 205.2
Public-Private Partnership (PPP)	A contractual agreement between a public agency and a private sector entity. Through this agreement, the skills and assets of each sector (public and private) are shared in delivering a service.	National Council for Public-Private Partnerships, www.ncppp.org
Records	Any information in written, visual or electronic form that documents the activities undertaken by a producer, handler or certifying agent to comply with the Act and regulations in this part.	NOP 205.2
Residue testing	An official or validated analytical procedure that detects, identifies and measures the presence of chemical substances, their metabolites or degradation products in or raw or processed agricultural products.	NOP 205.2
Responsibly connected	Any person who is a partner, officer, director, holder, manager or owner of 10 or more of the voting stock of an operator or a recipient of certification or accreditation	NOP 205.2
Skill	Expertness, practiced ability	Oxford American Dictionary 1999
State Organic Program (SOP)	A State program that meets the requirements of section 6506 of the Act, is approved by the Secretary, and is designed to ensure that a product that is sold or labeled as organically produced under the Act is produced and handled using organic methods.	NOP Regulations 205.2
Traceability test or trace-back	Verification that an operator has a recording keeping system in place which enables <ul style="list-style-type: none"> • Backward tracking of sales through production to ingredient/input purchasing • Forward tracking of inputs through production, warehousing and sales to final customers 	IOIA training
Witness audit	The witnessing of the certification body's conformity assessment activities during an inspection of a supplier, including an examination of the inspector's preparation for the inspection and the implementation of the certification body's inspection procedures. The inspection of the supplier may be a demonstration when it is not possible to conduct an actual inspection.	USDA AMS ARC ISO Guide 65 Program: Accreditation for Certification Bodies Section 4: Definitions

5 References

- ACA Compilation of Certifier Position Descriptions for Inspectors and Reviewers; August 2011
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- ISO 19011 Guidelines for quality and/or environmental management systems auditing; 2002
- Organic Products Regulation (Canada) 2009 SOR/2009-176; current to July 11 2011
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- National Organic Program Handbook (Winter edition 2011)
- NOP Online Training: *Investigating Complaints: What ACAs Should Know*, Compliance & Enforcement Branch, June 2009
- National Organic Program Final Rule 7 CFR, 2010
- National Organic Standards Board Principles of Organic Production and Handling, 2001
- ATTRA Workbooks, Checklists, OSP Technical Guide, Templates and Documentation Forms and Inspection forms IFOAM Accreditation Criteria for Bodies Certifying Organic Production and Processing, version 2005
- ISO/IEC Guide 65, 1996
- Organic Food Production Act (OFPA) of 1990 (USA)
- IOIA Accreditation Program August 2002
- OCC/IOIA Inspector Apprenticeship Program December 1998
- IOIA Apprentice-Mentor Guidelines October 2007
- IOIA Basic Training curriculum - Crops revised 2007
- IOIA Basic Training curriculum – Livestock revised 2008
- IOIA Basic Training curriculum – Handling revised 2008
- IOIA Code of Ethics revised 2001
- IOIA Code of Conduct revised 2001
- IOIA Draft Inspection Guide April 2006
- IOIA Training Institute Summary April 2011
- IOIA Training Program Guide revised 2008
- USDA AMS ARC ISO Guide 65 Program: Accreditation for Certification Bodies, Section 4 Definitions

6 Appendices

Guidelines for Preparation, Inspection and Reporting Times

Level of complexity	Example	Preparation time estimate	On site inspection time estimate	Post inspection time estimate ¹⁰²
Apprentice	15 acres organic strawberries, in rotation with green manures; one location; no conventional or transition, no on-farm processing	0.5 hr	2-3 hr	1 hr
	400 acres organic cash crops; one location; no conventional or transition, no on-farm processing	0.5-1 hr	3 hr	1 hr
	Organic pasta production, 10 employees, one location, no conventional	0.5-1 hr	3-4 hr	1.5-2 hr
Licensed	30 acres organic vegetables, in rotation with green manures; 2 locations; no conventional or transition, no on-farm processing	0.5-1 hr	4-5 hr	1.5-2 hr
	250 acres organic feed crops, 40 head organic dairy herd, no conventional or transition, no on-farm processing	0.5-1 hr	4-5 hr	1.5-2 hr
	Organic pasta sauces, 80 employees, 50% organic products, 50% conventional products, off-site warehousing	1-2 hrs	6-8 hrs	2-3 hrs
	Specialty crops /innovative processes			
Master	1800 acres cash crops, 8 locations, some land still in transition and under conventional management; 2 storage sites; on-farm cleaning and bagging	2 hrs	up to 1.5 days	2-3 hrs
	2000 head organic cow/calf; organic pasture; multiple locations, purchased feeds, custom slaughter house; custom sausage making. 15 different recipes, some in 95%, some 70%+, some MWO.	4 hrs	2 days or more	4-5 hrs
	Processes with in-process inventories (fermentations for example)			
	Inspections (un-announced or follow-up) related to suspected fraud or serious complaints			

7 Endnotes

¹ NOP 205.403 (c) (1)

² ISO 19011 6.2.5 and 6.3 and 6.4.1

³ ISO 19011 6.5.1

⁴ NOP Handbook ‘Five steps to certification’

⁵ A common oversight identified by ARC auditors was the lack of follow-up to previous minor noncompliances.

⁶ ISO 19011 6.5.2 and 6.5.5

⁷ NOP 205.403(d)

⁸ NOP 205.403 (c) (3) and 205.403 (e) ; NOP Handbook ‘Five steps to certification’

⁹ NOP 205.403 (d); ISO 19011 6.5.7

¹⁰ IOIA Training Program Guide p2

¹¹ see Definition of Terms

¹² Hereafter, first time operators and certified operators will be jointly referred to as operators.

¹³ Although the NOP does not specify a % of operators who must be targeted annually by un-announced inspections, ACA procedures normally set a target percentage.

¹⁴ IOIA Basic curriculum ‘Drawing the circle around an operation’

¹⁵ ISO 19011 recommends 40 hours of auditor training for all entry level auditors

¹⁶ NOP 205.403 and section 500;

¹⁷ ACA inspector position descriptions

¹⁸ NOP Program Handbook PM-11-6

¹⁹ IFOAM/IOIA Inspection Manual 2.3.5; ASQ Auditing handbook; ISO 19011 6.5.4

²⁰ ISO 19011 6.6.1; ASQ Auditing Handbook p 141

²¹ ISO 19011 7.3.1; ASQ Auditing Handbook

²² ISO 19011 6.4.1 and 6.4.3

²³ NOP 205.403 (b)(2)

²⁴ IOIA Training program guide; ACA inspector position descriptions

²⁵ ARC job description, IOIA training manual

²⁶ ISO 19011 7.3.1; ASQ Auditing Handbook p 141

²⁷ IFOAM/IOIA International Organic Inspection Manual 4.1.1

²⁸ IFOAM/IOIA International Organic Inspection Manual 4.8

²⁹ IFOAM/IOIA International Organic Inspection Manual 5.1.2

³⁰ IFOAM/IOIA International Organic Inspection Manual 6.2 and 6.3

³¹ NOP 205.501(a)(11); IOIA curriculum; ISO 65 42.2.o

³² ISO 19011 6.5.5; ASQ Auditing Handbook p 141; IOIA Training program guide

³³ IOIA curriculum

³⁴ ISO 19011 6.5.5

³⁵ This is a compilation from a variety of sources: NOP Regulations; ISO 19011 6.6.2 and 7.2; ASQ Auditing Handbook; Codex Alimentarius 6.6.a; ISO 65 4.2.f; IOIA Codes of Conduct and Ethics, IOIA training program guide; IOIA crops and handling curriculum; IFOAM Accreditation Criteria 1.4.11; and ACA inspector position descriptions.

³⁶ NOP 205.504 (c)(2) requires that inspectors file an annual conflict of interest disclosure report form, identifying any food or agriculture related business interests, including business interests of immediate family members that cause a conflict of interest.

³⁷ NOP 205.501 (a)(10) requires inspectors hold information confidentially.

³⁸ The USDA prohibits discrimination in all its programs and activities on the basis of race, color, national origin, gender or marital status (not all prohibited status apply to all programs),

³⁹ IOIA promotes a 2 defect guideline when inspecting foreign operations (see IOIA Code of Conduct and Ethics, which refers to knowledge of culture, language and crop. Also addressed in ARC job description.

⁴⁰ IOIA training prerequisite

⁴¹ This category describes entry-level inspectors who have completed basic training plus field training with a mentor. Other terms considered but not used were ‘apprentice’ and ‘provisional’. These could confer a connotation of inadequacy and were discarded in preference for the neutral term ‘inspector’. A one-year time frame was considered, but rejected. Some inspectors could move to licensing quite quickly while field training might take longer than 1 year for others. Mentor shortage could also lengthen time frames.

⁴² IOIA basic trainings have traditionally been 4.5 days per category, on site (not web-based), with 4 days of instruction and 0.5 day of testing

⁴³ Note: It is not feasible to apply all requirements, especially field training, to the wild crop scope separately from crop. It is recommended that any inspector qualified to inspect crops could also inspect wild crops, provided they received training specific to wild crop standards and inspection. At this time, wild crop inspection has been included in 100 level training content. Specific 200 level wild crop training could be required for wild crop inspection.

⁴⁴ The term ‘licensed inspector’ is used for those who have taken the step to become competent to do solo inspections, including 200 level training and successful completion of a licensing exam.

⁴⁵ Documentation can be through verification of membership, listserv email, etc.

⁴⁶ IOIA Training Institute draft

⁴⁷ Testing and exams rated fairly highly in the 2010 IOIA certifier survey

⁴⁸ NOP 205.402

⁴⁹ NOP 205.404(a)

⁵⁰ NOP 205.501(a)(11)(vi)

⁵¹ NOP 205.402(a)(1)

⁵² NOP 205.402 (a)(2)

⁵³ NOP 205.402(a)(4)

⁵⁴ NOP 205.402(a)(3)

⁵⁵ See ‘TERMS: Materials Evaluation Program’

⁵⁶ NOP 205.404(a)

⁵⁷ According to IOIA 2010 survey, some ACAs need to refer back to inspectors up to 50% of the time, before being able to complete the final review.

⁵⁸ NOP 205.402(b)(2) and NOP 205.403(d)(2)

⁵⁹ NOP 205.405(a)(3), NOP 205.405(b)(1)

⁶⁰ NOP 205.405(c)(1)

⁶¹ ACA reviewer position descriptions

⁶² NOP 205.402(a)(1-2); ISO 19011 6.3

⁶³ NOP Handbook 2601 Instruction “Five Steps to Certification”

⁶⁴ NOP subpart D

⁶⁵ NOP subpart D

⁶⁶ NOP 205.402(a)(3)

⁶⁷ NOP 205.402(b)

⁶⁸ NOP 205.501(a)(18)

⁶⁹ ISO 19011 6.2.4

⁷⁰ NOP205.406(a)

⁷¹ ACA reviewer position descriptions

⁷² NOP 205.403 e(2)

⁷³ NOP 205.403 e(2)

⁷⁴ ISO guidelines for Quality system management use the terms Corrective Actions (measures taken to correct identified non-conformances) and Preventive Actions (measures put in place to ensure an identified Non conformance does not recur). ISO guidelines also differentiate between major and minor non-conformances.

Although such terms can be very helpful, in the present document the authors have intentionally remained faithful to the language in the NOP Regulations.

⁷⁵ NOP 205.404(a)

⁷⁶ NOP 205.405(a); note that 205.405(c) details how notices of denial are to be issued

⁷⁷ NOP 205.501(a)(18)

⁷⁸ NOP 205.501(a)(15) and NOP 205.662 and NOP 205.665

⁷⁹ NOP 205.501(a)(2); ACA reviewer position descriptions

⁸⁰ Since not all NOP Accredited Certifying Agents are accredited to ISO 65, this has been kept general.

⁸¹ ACA inspector position descriptions

⁸² NOP 205.501(a)(1)

⁸³ Most of the skills in section 3.2 are based on the ACA inspector position descriptions

⁸⁴ It seems that most review work is done by staff, but some review work is contracted out, often to inspectors.

⁸⁵ NOP Handbook PM-11-6

⁸⁶ ACA inspector position descriptions

⁸⁷ ACA inspector position descriptions

⁸⁸ This is a compilation from a variety of sources: NOP Regulations; ISO 19011 6.6.2 and 7.2; ASQ Auditing Handbook; Codex Alimentarius 6.6.a; ISO 65 4.2.f; IOIA Codes of Conduct and Ethics, IOIA training program guide; IOIA crops and handling curriculum; IFOAM Accreditation Criteria 1.4.11; and ACA inspector position descriptions.

⁸⁹ NOP 205.504 (c)(2) requires that inspectors file an annual conflict of interest disclosure report form, identifying any food or agriculture related business interests, including business interests of immediate family members that cause a conflict of interest.

⁹⁰ NOP 205.501 (a)(10) requires inspectors hold information confidentially.

⁹¹ The USDA prohibits discrimination in all its programs and activities on the basis of race, color, national origin, gender or marital status (not all prohibited status apply to all programs),

⁹² ACA inspector position descriptions

⁹³ ACA inspector position descriptions

⁹⁴ IFOAM 1.4.2; ACA reviewer position descriptions

⁹⁵ IOIA inspector training in the appropriate category (crops, livestock, handling) is required by many ACAs for their reviewer positions. Some ACAs even require that new reviewers accompany inspectors as part of their training. However, at present, IOIA training is geared more for inspectors than for reviewers. This speaks to the need for developing reviewer-specific training modules.

⁹⁶ ACA reviewer position descriptions

⁹⁷ ACA reviewer position descriptions

⁹⁸ NOP 205.501 (a)(6) and 205.510(a)(4)

⁹⁹ ISO 65 4.4(c) requirement for contracted personnel – ISO specifically states “obtain the applicant’s consent”

¹⁰⁰ The narrative text includes a list of peripheral responsibilities conferred to reviewers which do not pertain to file review. The authors have chosen NOT to include those peripheral responsibilities in the proposed performance evaluation.

¹⁰¹ This can be documented by membership verification, listserv email, etc.

¹⁰² Reporting time is very variable depending on ACA reporting procedures. Some ACAs have no post-inspection reporting (all reports completed on site) so in those cases, post-inspection time could be zero. Some ACAs require more narrative in reports. The times shown in this table are likely low for that reporting format.