



National Organic Program
1400 Independence Avenue, SW
Room 2642-South, STOP 0268
Washington, DC 20250-0268

NATIONAL ORGANIC PROGRAM RESPONSE TO 2021 PEER REVIEW

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FROM: Jennifer Tucker, Ph.D.
Deputy Administrator
National Organic Program (NOP)

SUBJECT: National Organic Program Response to 2021 Peer Review

Background

The peer review process is a vital component of the U.S. Department of Agriculture (USDA) Agricultural Marketing Service National Organic Program's (NOP) commitment to continuous improvement. The peer review process is described in [NOP 1031 "Peer Review of National Organic Program \(NOP\) Accreditation."](#) For its 2021 peer review, the NOP contracted with the ANSI National Accreditation Board (ANAB). The 2021 ANAB Peer Review Panel evaluated NOP's compliance with NOP accreditation procedures and decisions, and with ISO/IEC 17011, an international quality standard for accreditation bodies

Overall, the ANAB auditors found that NOP and its staff are in compliance with NOP's own policies and procedures, and ISO/IEC 17011, and shared positive feedback about several areas of program operations.

Opportunities for Improvement

Below is NOP's summary of ANAB's one recommended area for improvement.

1. **Impartiality Risk Analysis.** NOP can improve its existing draft risk analysis matrix, which documents potential threats to the impartiality of the program, by finalizing the document. This includes identifying any additional potential threats to impartiality, and explaining the classification of different types of threats, including residual levels of risk after mitigation.

NOP Response

NOP agrees with the importance of actively monitoring and managing potential risks to impartiality in its accreditation program, compliance and enforcement activities, and other program activities. Since the 2020 Peer Review was completed, NOP has focused on developing a process to better document the program's risk mitigation strategies for safeguarding impartiality. In response to the opportunity for improvement, the NOP is implementing the following actions:

1. **Risk Analysis.** NOP has completed its draft Risk Mitigation Table documenting the ways in which the program mitigates and controls potential threats to the program's impartiality. NOP included additional areas of potential risk in the table, and an

explanation of how the program manages the potential harm from potential threats. As a part of the new safeguarding impartiality process, [NOP has requested the National Organic Standards Board \(NOSB\) review and comment](#) on NOP's risk mitigation strategies in place during the Spring 2022 NOSB public meeting. Additionally, this review by the NOSB satisfies the ISO-based requirement for stakeholder input and provides additional insight in how the NOP can continuously improve its own processes.

Next Steps

The NOP values the constructive feedback from ANAB. We take continuous improvement seriously and will continue to evolve our process controls and planning in response to ANAB's comments and feedback. By focusing on quality and risk-aware processes, the NOP continues to support the organic community and maintain organic integrity for all.