

NATIONAL ORGANIC PROGRAM RESPONSE TO 2019 PEER REVIEW

March 24, 2020

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SUBJECT: National Organic Program Response to 2019 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 2019 peer review, the NOP contracted with the American National Standards Institute (ANSI). The 2019 ANSI Peer Review Panel evaluated NOP's compliance with NOP accreditation procedures and decisions, and with ISO/IEC 17011, a quality standard.

Overall, the ANSI auditors found that NOP and its staff are in compliance with NOP's own policies and procedures, and ISO/IEC 17011.

Opportunities for Improvement

Below is NOP's summary of ANSI's recommended six areas for improvement.

1. **Impartiality Risk Analysis.** The NOP should improve its risk identification and analysis process related to impartiality. The NOP does not document the process for identification, analysis, control and mitigation actions for all potential impartiality risks. The NOP should develop a process for interested parties to participate in the safeguarding of impartiality.
2. **Root Cause Analysis.** The NOP should document the causes of noncompliances when developing corrective actions from internal audits.
3. **Internal Audit.** The NOP should use a standard audit checklist and reporting templates, as applicable, when conducting its internal audit, and maintain relevant records as per NOP procedures.
4. **Management Review Agenda.** The NOP should include additional agenda items in its management review procedure to comply with the updates in ISO/IEC 17011:2017.
5. **Updated Responsibilities and Authorities.** The NOP should update its documentation of NOP responsibilities and authorities in its quality system as it implements its expanded organizational structure.

6. **Document Control Procedures.** The NOP should improve the effectiveness of its document control procedure.

NOP Response

Since the 2018 Peer Review was completed, NOP has focused significant resources on improving processes, addressing personnel needs, and developing training. In response to the six opportunities for improvement, the NOP is implementing the following changes:

1. **Impartiality Risk Analysis.** The NOP exercises many controls to maintain impartiality. All government employees are required to follow ethics rules and take an oath that prohibits conflicts of interest and requires confidentiality. Staff assignments are carefully considered to avoid conflicts of interest, and top management is subject to annual financial disclosures. As the NOP continues to develop risk-based oversight approaches, it will develop a procedure for identifying and mitigating potential risks to impartiality and a process for effective participation from interested parties.
2. **Root Cause Analysis.** The NOP regularly identifies the cause of noncompliances, but in the future will also document the cause of the noncompliance when drafting corrective actions for internal audits.
3. **Internal Audit.** The NOP will update its internal audit documents and ensure the correct templates are in use when applicable. The Quality Manager will oversee the process of revising the quality management system to reflect NOP's growth as a program.
4. **Management Review Agenda.** As part of the quality system revision process, the NOP will update the management review documents to reflect ISO 17011:2017 updates. The 2019 NOP Management Review incorporated the additional agenda items required.
5. **Updated Responsibilities and Authorities.** The NOP will update its internal quality control documents, including the organizational chart. The documents will include the new positions established this year once the hiring process is complete.
6. **Document Control Procedure.** The NOP plans to update its internal quality control documents to ensure they are current and accurate given NOP's growth and evolution as a program. The Quality Manager will oversee the process of revising the quality management system.

ANSI Comments

In addition to the Opportunities for Improvement above, ANSI also shared three observational comments. ANSI's comments and NOP's response to these comments follow.

- A. ANSI commented that NOP should encourage certifiers to comply with the Impartiality Risk Analysis element of the ISO/IEC 17065 (ref. ISO/IEC 17065 clauses 4.2 (Management of Impartiality) and 5.2 (Mechanism for safeguarding impartiality)).
Response: The NOP agrees that certifying agents would benefit from implementing the Impartiality Risk Analysis requirements of ISO/IEC 17065. NOP plans to develop a training lesson for the Organic Integrity Learning Center to address strategies for certifiers to safeguard their impartiality.

- B. ANSI commented that NOP does not use the International Accreditation Forum (IAF) guidance on auditor competence (Annex 1), which is mandated for 17011.

Response: The NOP believes the detailed criteria described by IAF for hiring and evaluating staff are already reflected in USDA's performance plans and appraisal processes. The NOP follows a rigorous process for hiring and evaluating personnel. The NOP will continue to ensure the evaluation process meets the IAF (Annex 1) requirements.

- C. ANSI commented that procedures for residue sampling continue to not be clearly understood or followed by international certifiers and satellite offices.

Response: In response to this OFI from 2018, the NOP conducted a training on residue sampling procedures at BIOFACH in February 2020. NOP is also developing a training course for the Organic Integrity Learning Center on sampling, testing, and responding to results.

Next Steps

The NOP values the constructive feedback from ANSI. We take continuous improvement seriously, and will continue to evolve our document control practices and quality management system. By focusing on quality and risk-aware accreditation processes, the NOP continues to support the organic community and maintain organic integrity for all.