



BIG QUESTIONS, ANSWERED

How do I avoid or handle a noncompliance?

BEST PRACTICES *for* AVOIDABLE MISTAKES:

Update Organic System Plan

Always update your OSP when making significant changes to things like: materials, products, labels, land, business names, sanitation and pest control practices, or when adding a new scope of certification.

Follow Material Use Restrictions

Materials in your approved OSP often carry specific restrictions that must be followed. Review all restrictions and document your material use to demonstrate compliance.

Keep Clear & Organized Records

Missing, incomplete or inaccurate records may lead to a noncompliance, so have a system in place to ensure your operation's activities are well documented and traceable.

Follow OTCO Communications

OTCO notifications include deadlines for submitting paperwork or scheduling your inspection. They also contain reminders about issues that might lead to NCs down the road if you don't take certain actions.

* REQUIREMENTS & RIGHTS *when* ISSUED A NONCOMPLIANCE *

BASICS OF A NONCOMPLIANCE

What is a noncompliance (NC)?

Any deviation from the regulation that is a violation and requires a response from the client to address the issue.

What happens when a NC is issued?

OTCO sends a description of NC, factual basis for NC, and the information/actions needed for resolution. Certification is not completed until NC is resolved. Responses must be submitted by the specified deadline.

What is the deadline for response?

Generally, responses must be submitted in 21 days.

COORDINATING ACTIONS & RESPONSE

How do I compose a response?

1. Take time to read/understand the issue, and what is being requested of you. Still have questions? Give us a call.
2. Compile requested information in the way it is requested (a letter, records, photographs, etc.); if a specific item is not requested, carefully consider what documentation will best demonstrate compliance.
3. Describe all actions taken to ensure future compliance.
4. If a plan for future action is requested, describe what will be done and when it will be completed.
5. Contact OTCO with any questions about your response.

OUTCOMES & OTHER CONSIDERATIONS

How is a NC resolved?

OTCO reviews the NC response, and may request additional information; once a response is complete, a resolution notice will be issued and an updated certificate may be issued.

What happens if a NC is still unresolved?

If NC goes unanswered, it will escalate to a proposed suspension, which may lead to suspension or revocation of certification.

What if you disagree with the NC issued?

You may contest the NC and corrective action in a written rebuttal. OTCO will review and if rebuttal is unsuccessful, corrective actions must be submitted or the issue will escalate to a proposed suspension.