



Organic Inspections During COVID-19: Challenges & Solutions Webinar Q&A Responses

On May 7, 2020, the Organic Trade Association partnered with the Accredited Certifiers Association (ACA), International Organic Inspectors Association (IOIA) in hosting an Organic Inspections During COVID-19 webinar. With limited time to host a Q&A session, our panelists and speakers compiled responses to questions we were unable to respond to live. More information can be found on page 4.

Question: Are there resources to help with technical issues like "how do I take a video with a timestamp"?

Answer: IOIA is preparing a training that will cover many of the technical aspects of a virtual inspection including taking a video with a timestamp. This should be available in about a week and is free to IOIA members and for a fee to operators and inspectors who are not IOIA members. In some cases operators (and inspectors) may need to use the vast amounts of videos and videos available on-line.

Question: When will the Best Practices be posted or will you email to us?

Answer: The ACA best practices will be posted to the Accredited Certifiers Association (ACA) website when they are finalized. We expect this will be finalized this month (May). You can visit www.accreditedcertifiers.org/policy-advocacy to download a copy and also review other best practices documents published by the ACA.

Question: If there needs to a follow-up inspection after a remote inspection, would the operation be notified about that by the certifier before agreeing to the remote inspection?

Answer: Generally yes, if there is a need for follow up inspection to verify onsite conditions or practices the certifier would notify the operation and an additional inspection would be scheduled. However, this does not necessarily mean that an unannounced inspection could not occur. Any operation may be selected for unannounced inspections at the certifier's discretion.

Question: If we are due for a recertification, do we just wait until we hear from our inspector?

Answer: Yes, you will either hear from the inspector or the certifier directly about their plans for your 2020 inspection. Depending on a risk assessment, type of operation, location and various factors your inspection may be prioritized for a remote inspection or may not be. The inspector or certifier will contact you with their plans.

Question: Will manufacturing/processing facilities with restricted areas for rated electronics be given additional flexibility?

Answer: I would consult with your certifier as soon as possible. It's quite possible they can work out a solution, which may or may not include a "hybrid" inspection that focuses on just this area of the operation if necessary.

Question: How will a virtual inspection work if we do not allow cameras or photos in the facility?



Answer: It will have to be done as a hybrid inspection with the documentation done as a virtual/remote audit and an on-site when possible. You may need to re-assess this requirement if you want to receive an inspection in a timely manner this year. As a work around, you might consider granting the inspector temporary access to your internal security cameras. In any case it sounds like management may need to consider adopting special policies. Remember that the inspector does not save the video of the operation and, just like any other inspection, they are bound by a strict confidentiality agreement.

Question: Any thoughts on the required on-site inspection for initial certification for a private label retailer (e.g., an on-site inspection of a site that has no processing/production lines)?

Answer: Most certifiers are allowing full virtual/remote audits for brokers and traders with no storage or handling (who do not handle the product in any way); however, the USDA National Organic Program (NOP) has made it clear that on-site inspections must occur for initial/new operations and there has been no exception issued from the NOP. Discuss this with your certifier as soon as possible.

Question: Virtual connectivity on *many* farms is a non-starter. Cell service is wildly spotty. What is the contingency for the substantial number of farms where it just is not possible to do this?

Answer: IOIA is working on developing a local inspector network database so that certifiers have access and connections to more certifiers in areas for local inspection work. Where internet or cell service is not adequate certifiers expect to be able to send local inspectors out practicing a safe socially-distanced no contact inspection and review.

The procedure will need to involve either:

- 1) The operator taking a video of specific areas after consultation with and following the directions of the inspector. This video subsequently would be sent to the inspector once the operator is back in cell or Wi-Fi range; or
- 2) This operation may receive a "hybrid" inspection, whereby records are reviewed with the operator from a location with internet, and then an inspector visits the farm just to review the fields at a safe distance from the operator.

Question: Is there a way for general feedback regarding the remote inspection processes going to be collected? We're concerned as a handling operation about buying from many suppliers with a variety of certifying bodies involved?

Answer: Most certifiers are requesting feedback after an audit. If they do not specifically provide an avenue for this feedback you should feel free to share your feedback with them. ACA and IOIA members are committed to ensure consistency in our approach and your feedback will help ensure we are aligned in our enforcement of organic integrity.



Question: Can you clarify if it's our responsibility to pay a travel fee for inspectors?

Answer: Each certification agency has sets their own fee schedule and rates. Reach out to your certification agency to understand how your fees may be impacted if a remote audit is scheduled instead of an on-site audit.

Question: Has the NOP provided any indication of long-term contingency planning in regard to in-person audits for new applicants in the event on-site audits remain untenable for some operations for the rest of the calendar year?

Answer: No additional information other than what was presented during the webinar has been provided by the NOP. At this point, direction remains the same; that a new applicant to certification must have an on-site inspection prior to granting certification.

Question: Has a remote inspection been held as a mock exercise? How did it go?

Answer: Members of IOIA have performed many virtual/remote audit.

For example, Lois randomly chose the traceback and the mass audit balance at the beginning of our remote audit and was able to complete it during the course of the GotoMeeting with live documentation. It was not a mock audit, but a real-time audit of the documentation. Many other inspectors are doing similar remote desk audits - in some cases it takes place over a period of several days (several meetings) and the traceback and mass audit balance is generally chosen at the first meeting and perhaps reviewed at a second meeting.

As another example, Garth held one with another accredited IOIA inspector on his farm using his operation as a "mock client." Other IOIA members/trainers have undertaken similar exercises for the purposes of developing/testing protocols and creating training materials.

Question: Has USDA NOP provided clarification for when an organization changes certifying bodies? Is the first audit with the new certifying body considered an initial audit or is it considered an ongoing audit under a different certifying body?

Answer: The NOP has not published information on this situation with respect to remote audits. However, USDA organic regulations require certification agencies to accept the certification decisions made by other accredited agencies. Reach out to both your current certifier and your new certifier to determine options for a remote audit to complete your transfer of certification based on your specific situation and compliance history. .

Question: In the past if a crop had to be harvested prior to inspection the farmer was required to leave a small portion for verification at a later date.

Answer: If the field is a currently certified site and crop, the USDA organic regulations do not require the crop to be left in the field until after inspection. Reach out to your certifier to discuss their approach and practices.



About the Organic Trade Association: The Organic Trade Association is a membership-based organization for the organic industry. We ensure that all parts along the organic value chain have a strong voice with government and the public. We bring farmers, processors, distributors, retailers, and others together to promote and protect the growing organic sector. OTA represents its members to government on sector needs, market development and promotion, and strong organic standards and regulations. Members also receive the latest information and quick answers on organic regulations and standards in the U.S. and around the world.

About the Accredited Certifiers Association (ACA): The Accredited Certifiers Association (ACA) strives to ensure consistent implementation of USDA Organic Regulations through collaboration and education of accredited certification agencies. We do this in various ways: 1) We provide a mechanism for discussion and sharing of information among certification agency staff members through our ACA on-line Discussion Group; 2) We provide information and feedback to the National Organic Program; 3) We provide detailed information regarding the certification process to the National Organic Standards Board in the way of comments on their Discussion Documents and official Board Recommendations; and, 4) We provide in-depth professional development training programs for member certification agency staff. The ACA uses Working Groups comprised of those interested in specific topics to develop our comments and information for the National Organic Program and the National Organic Standards Board.

About the International Organic Inspectors Association (IOIA): The IOIA is the professional organization of organic inspectors and offers training and networking world-wide for crop, livestock, and processing inspectors. IOIA was founded in 1991 by organic inspectors who recognized the need for uniform inspector processes and protocols to build inspector skills and promote public confidence. IOIA launched the first inspector accreditation program for organic inspectors in 1994. Incorporated in the USA as a nonprofit, IOIA operates globally with nearly 250 inspector members in more than a dozen countries. Supporting membership is open to individuals, businesses, and organizations that support IOIA's goals. The IOIA Training Institute trains hundreds of working and new inspectors annually through dozens of on-site or web-based internationally recognized training events. IOIA collaborates within the organic sector with governmental agencies including the USDA National Organic Program, certification agencies, and other nonprofit educational entities, to ensure quality inspections, quality inspectors, and organic integrity.

About the Webinar: As the COVID-19 outbreak creates organic supply chain disruptions, so does the need for continuity of organic inspection operations. You will learn about the unique challenges of the organic sector and how OTA, the ACA and the IOIA are working together to ensure organic compliance and the integrity of the organic supply chain. Participants will learn about the best practices and inspection tools that are being used to conduct inspections and verify compliance while travel restrictions are in place. In addition, certified operators will learn how to best prepare for an on-site or remote audit. You can register to view the webinar at the link above or [OTA.com/COVID-19](https://ota.com/COVID-19).

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