

AGRISECURE – UNANNOUNCED INSPECTIONS

October 2019

The USDA Nation Organ Program (NOP) requires certifying agencies to conduct unannounced inspections on 5% of certified operations annually. This guide provides an overview of the NOP regulations, the ICS Protocol, and the steps to be prepared.

USDA NOP UNANNOUNCED INSPECTION OVERVIEW

From [NOP 2609](#)

- On September 12, 2012 the USDA NOP issued guidelines for certifying agencies regarding the expectations and procedures for unannounced inspections.
- Unannounced inspections are one of the most effective and useful tools in the USDA organic regulations to ensure compliance across certified operations, and give consumers additional reasons to trust the organic label.
- Operations selected for unannounced inspections may be random, risk based, or the result of a complaint or investigation. The certifying agent should disclose to the operation the reason that the operation was chosen for the unannounced inspection.
- An inspection report must be written by the inspector, sent to the client, reviewed by the certifying agent, and the results communicated the clients.
- If an operation refuses to allow an inspector access to any part of an operation, during normal business hours, including non-organic portions of the operation, the operation would be in violation of NOP § 205.403, and the certifying agent should promptly issue a Notice of Noncompliance to the operation.
- A certifying agent should clearly disclose protocols for unannounced inspection to certified operations. Certifying agents may charge an operation for unannounced inspections as long as the fees are clearly disclosed to all certified operations.

STEPS FOR BEING PREPARED

1. Keep MyFarm Field Plans & Activity Tracking Up-to-date

- a. Track Completed Activities & Clean-Outs – field plans are accurate & up-to-date
- b. Products Records – invoices, seed-tags, non-GMO statements, etc. have been sent to AgriSecure

2. Grain Storage:

- a. Stored Grain Matches MyFarm & Yields Updated – let your AE know updated yields
- b. Sales Records – BOLs & Settlement Sheets are accurate and updated in MyFarm
- c. Bin Labels – Make sure your grain bins are appropriately labeled and the quantities in MyFarm Grain Tracking are accurate. Also make sure your organic crop inputs are segregated from

3. Parallel Operations: tracking both conventional and organic production

4. **Record Keeping Access:** *make sure you have access to your electronic records via MyFarm* and you are able to navigate to various types of records including your OSP, invoices, etc. (if not, contact your AE).

Also, provide AgriSecure with all appropriate records for the current and previous crop years.

5. **Keep Backup Records:** AgriSecure recommends keeping a backup copy of all paper and electronic records accessible for an inspection.
6. **Coach Your Team:** Meet with your hired hands about the potential for a required Unannounced Inspection, and to contact you to engage the inspector (vs. doing it themselves or not allowing the inspector on the property).

LEVERAGING THE MYFARM PLATFORM

- **Field Plans & Activities** – the field plans section will allow you to show field-by-field and activity-by-activity records of what has happened on your farm, and how it aligns with your OSP.
- **Crop Inputs** – the Crop Inputs section (under Analysis) provides a summary of all inputs used on your operation for a given crop year, including the fields and application rates.
- **Reports Center** - allows you to quickly pull data to be shared with an inspection if requested.
 - Farm Plan History – reports all activities from for previous 3-5 years, including last prohibited activity if appropriate. Will include current year's completed activities only.
 - Clean-Out Report – pulls all clean-outs for the crop year selected.
- **Certification Records** – can be found in the "Reports" section and provides visibility to your ICS OSP plan modules and farming records (e.g., seed tags, crop input labels, invoices, settlement statements, affidavits, etc.). BUT... *only if you have shared them with AgriSecure.*

ICS PROTOCOL

From ICS Certification Manual, Version 2, September 07, 2018 (# 0-MA155)

ICS performs additional announced and/or unannounced inspections of its certified operation(s) for all programs. Depending on the reason for the additional and/or unannounced inspection, ICS's plan can either be a full inspection or a defined visit as directed by ICS. Unannounced inspections are selected using the following criteria: Random selection, parallel and split operations, likelihood of contamination, conditions imposed, staff/certification team/inspector recommendation, internal evaluation of organic system plan, complaint received, geographical location and neighbor activity, random sample results, annual or risk basis, change or update of organic system plan, etc. An unannounced inspection should not include prior notification of the inspector's arrival. However, special cases may warrant prior notification to ensure appropriate representatives are present. Inspectors are advised to have adequate identification and an explanatory letter from ICS, to demonstrate they are acting on behalf of ICS. If an operation refuses to allow an inspector access to any part of an operation, during normal business hours, including non-organic portions of the operation, the operation will be in violation of NOP205.403 and ICS will promptly issue a Notice of Noncompliance.

For the NOP program, ICS annually selects 5% of certified operations for an unannounced inspection. These unannounced inspections are also selected based on the above risks that could affect the organic status of products. These unannounced inspections are also selected based on the above risks that could affect the organic status of products. If any noncompliance(s) are found during the unannounced inspection, ICS issues an operation a Notice of Noncompliance. Operators will be sent a report of the Unannounced Inspection.