



National Organic Program Certification File Review Checklist – Supplement for Grower Groups

Instructions: This Checklist is used in conjunction with Tables 1 - 3 of NOP 2005. The Checklist is used only to record the overall evaluation of Grower Group files where a full file review was conducted.

Use the certification file number as recorded in Table 1, NOP 2005 to identify the certification file(s). If a requirement is not applicable, include relevant information in the "Remarks" for that section.

This Checklist is not used to record the overall evaluation of full file reviews for types of operations other than grower groups. Instead, the Certification File Review Checklist, NOP 2005-2, must be used.

References:

Policy Memo 11-10 Grower Group Certification

NOSB Recommendation: Criteria for Certification of Grower Groups, October 20, 2002

NOSB Recommendation: Certifying Operations with Multiple Production Units, Sites, and Facilities under the National Organic Program, November 19, 2008

Organic System Plan (OSP) §205.401 (a) and §205.406 (a)

Does the OSP include:	Yes	No	Certification File Number(s)
A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed? §§205.200; 205.202 - 205.207; 205.236 – 205.240; and 205.270 – 205.272			
A list of each substance to be used as a production input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable?			
A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented?			
A description of the recordkeeping system implemented to comply with the requirements established in §205.103?			
Does the OSP include a description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and products with prohibited substances?			
Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations?			



Issues Specific to NOSB Recommendation, November 2008			
ACA Policies and Procedures and Producer Group Operation (PGO) prerequisites:	Yes	No	Certification File Number(s)
Did the ACA verify and does the PGO meet the prerequisites for a PGO as defined in section III.B? a. PGO is organized as a person ☐ b. Certification owned by the Group ☐ c. PGO seek certification with qualified ACA ☐ d. PGO practices uniform, consistent process, same inputs ☐ e. Members only market through PGO, unless individually certified ☐ f. PGO utilizing centralized processing, distribution, marketing facilities and systems ☐ g. PGO record-keeping protocols are consistent ☐			
Did the ACA approve the designation of specific members or subunits as belonging to a single production unit according to the criteria defined in section III.C? a. Shared training regime ☐ b. Operate together under same section of PGO OSP ☐ c. Share common input supply ☐ d. Share common ICS personnel ☐ e. Use single post-harvest processing system ☐ f. Located within geographic proximity ☐ g. Produce unique products or varieties ☐ h. Share the same harvest schedule ☐			
Does the ACA have policies and procedures for determining how many of the <u>sub-units</u> within a production unit <u>must receive an annual inspection</u> by the ACA's inspector as required by section III.D.1(Risk Factors and See Annual Sampling Percentage Rate below)?			
Do the ACA's policies and procedures include <u>determining which sub-units present the greatest risks</u> of non-compliance?			
Criteria and guidance for Annual Sampling Percentage Rate (Based on NOSB Recommendation 2008, section III.D.1)			



Once the annual sampling percentage rate is determined by the ACA, the highest risk sub-units are identified and inspected. Of the remaining samples to be inspected annually, at least 25% of these the sub-units should be selected at random. This helps to prevent the complacency that might be inadvertently encouraged by a certifier focusing only on higher-risk members of the multi-site operation.

Example 1: 100 sub-units. Sample rate determined by the ACA: 10%. 3 sub-units are identified by ACA as "high risk" and inspected. Of the remaining 97 sub-units, 7 more will need to be inspected to reach the 10% rate. At least 2 of those (25%) should be selected for inspection at random.

Example 2: 100 sub-units. Sample rate determined by the ACA: 30%. 10 sub-units identified as "high risk" and inspected. Of the remaining 90 sub-units, 20 more will need to be inspected to reach the 30% rate. At least 5 of those (25%) should be selected for inspection at random.

It is the responsibility of the ACA to instruct the inspectors on which high-risk sub-units must be inspected and the number of lower-risk sub-units that should be sampled based on their determination of the group's over-all risk. The ACA will ensure that this protocol is transparent.

Assessment of units to be inspected by the ACA's inspector

A. Annual Sampling Percentage Rate established by ACA:			
B. Total number of sub-units in the PGO:			
C. A multiplied by (x) B = (number of sub-units to be inspected by ACA):			
D. Number of sub-units identified as high risk by ACA and must be inspected:			
E. C subtract (-) D = (number of remaining sub-units):			
F. E multiplied by (x) 25% = (minimum number of sub-units to be selected at random):			
	Yes	No	Certification File Number(s)
In reviewing the file and "C" above were there a sufficient number of sub-units inspected?			
Was the required number of high risk sub-units inspected? ("D" above)			
Were a minimum of 25% sub-units randomly selected? ("F" above)			
Were the remaining sub-units inspected based on the criteria in section III.D.1?			
Was there a mandatory inspection of new entrants to the production unit?			
Did the ACA properly identify members within the production unit that processed or consolidated product from more than one member and have them inspected annually in accordance with section III.C?			

Remarks:

XXX

Issues Specific to NOSB Recommendation, October 2002

Requirements:

	Yes	No	Certification File Number(s)
PGO has established and implemented an internal control system (ICS) in accordance with Recommendation #1?			



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Was all information required to be provided to the inspector prior to the inspection provided in accordance with §205.501(a)(18) and Recommendation #2.A?			
Was the method for determining how many growers to be inspected documented in the file?			
Does the inspection report include information on the Internal Control System (ICS) and Organic Control Points; including steps taken by the ICS to enforce compliance with the standards as described in Recommendation #2.B; and information on the applicable areas of the 19 areas that should be included as described in Recommendation #2.C?			
Remarks:			
XXX			
Overall Determination Statement:			
Include a statement based on an overall determination on whether the operation meets the following as applicable: the crop production standards (§§205.200 through 205.206); the handling production standards (§§205.270 through 205.272); the NOSB Recommendation: Criteria for Certification of Grower Groups, October 20, 2002; and applicable guidance documents of the NOP Handbook. Include a statement on whether the initial review, inspection, and final decisions were in compliance with the requirements.			
XXX			