



Organic Inspections During COVID-19

Challenges + Solutions

SINCE 1985
Organic
trade association

IN PARTNERSHIP WITH



OUR COVID-19 ORGANIC INSPECTIONS

SPEAKERS & EXPERT PANELISTS

BRENDA BOOK, Washington State Department of Agriculture, Organic Program Manager

LOIS CHRISTIE, Christie Organic Consultants; IOIA Board Chair

GARTH KAHL, Independent Organic Services, Inc.; IOIA Inspector

MARNI KARLIN, Karlin Strategic Consulting, Principal

CONNIE KARR, Oregon Tilth (OTCO), Certification Director; ACA Board Chair

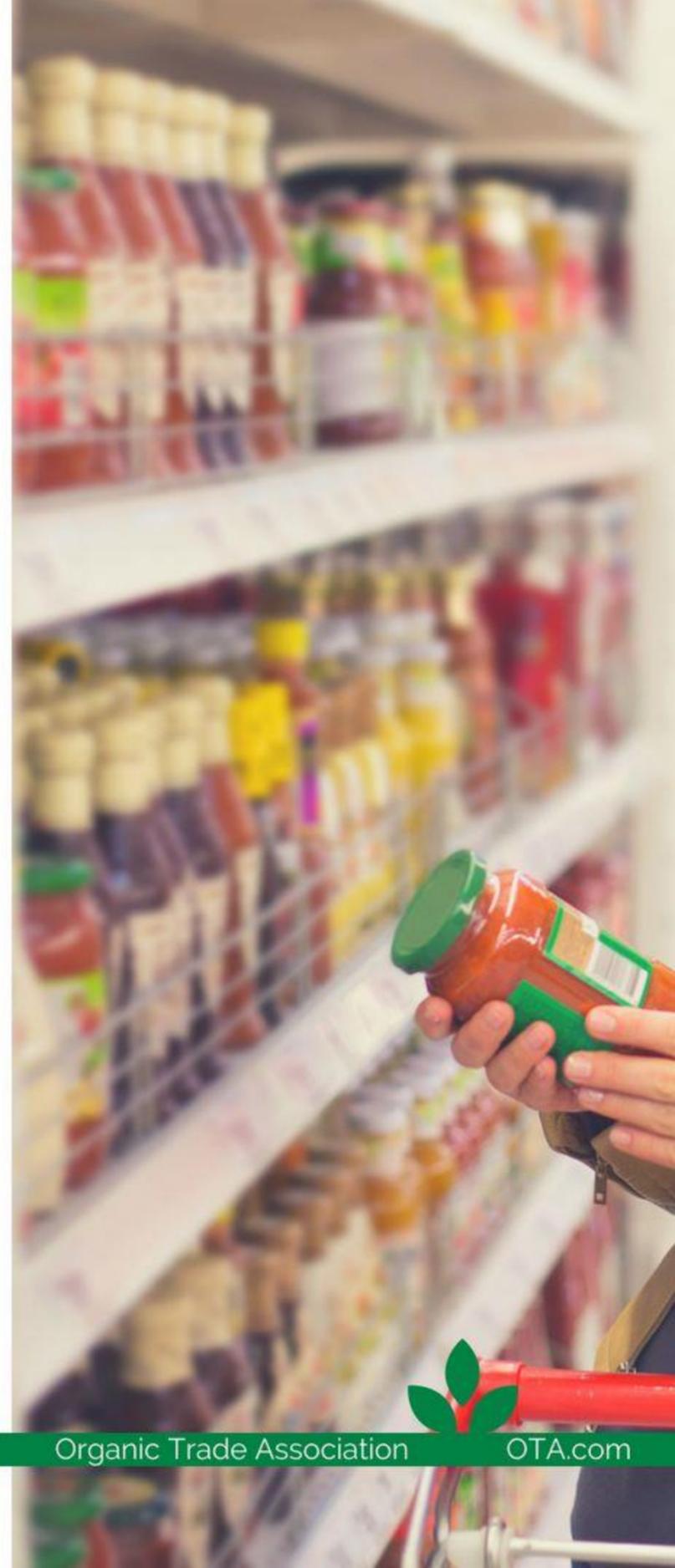
BETH ROTA, Quality Certification Services, Policy and Quality Assurance Manager; ACA Board Member

GWENDOLYN WYARD, Organic Trade Association, Vice President of Regulatory and Technical Affairs

OTA Member Engagement

For the past two months, OTA has dedicated time and resources to information sharing with our members, answering questions, and addressing concerns

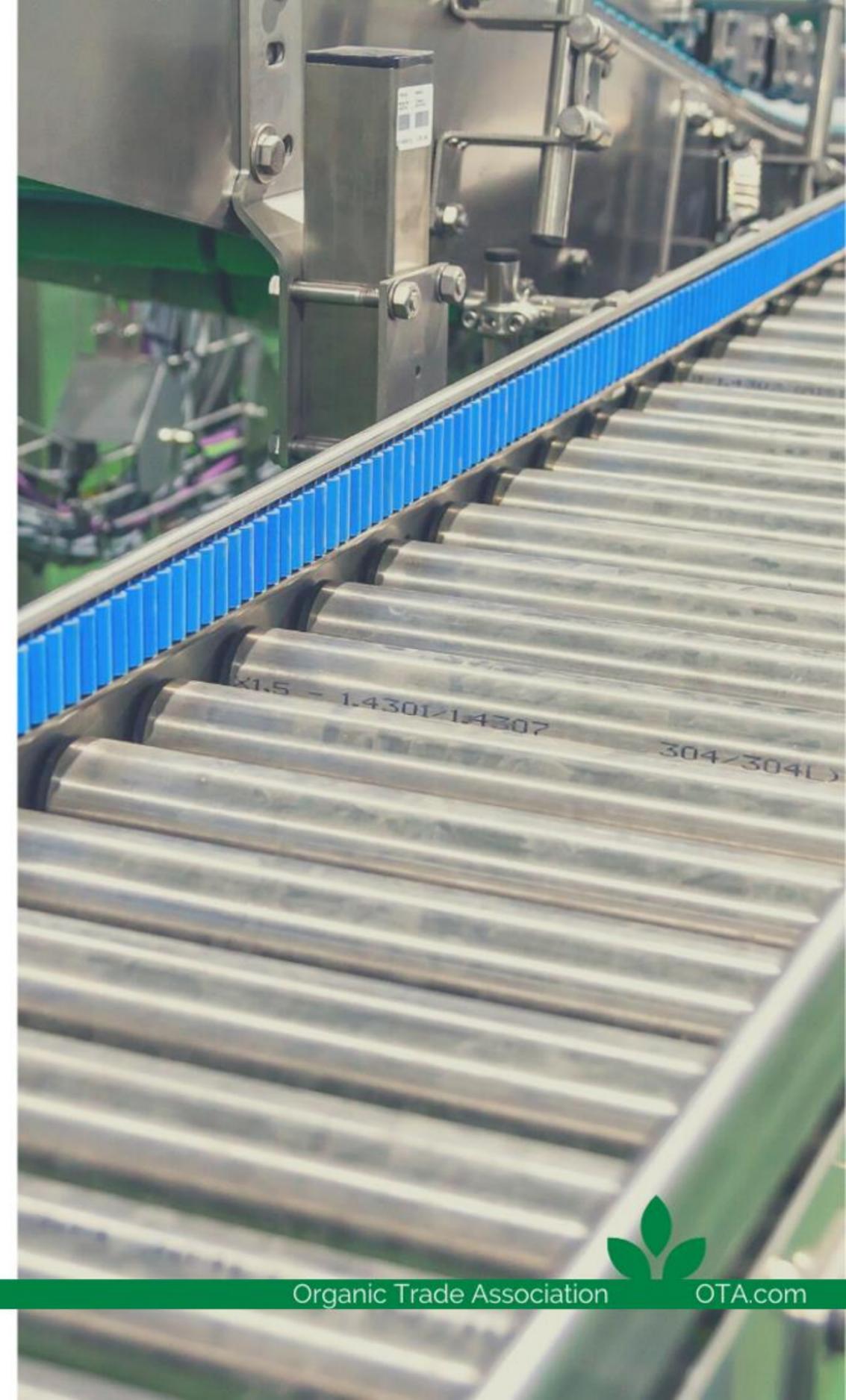
- Listening sessions to understand impact on the ground
- Member survey for USDA: organic supply chain impacts
- COVID-19 dedicated webpage (ota.com/covid-19)
- Weekly News Flash
- Webinar series
 - Organic Inspections: **610+** registered, highest attendance of any webinar OTA has ever hosted



Supply Chain Challenges

Organic farmers and handlers need to quickly adjust to bring on new land, processing lines, facilities, storage units, etc.

- Increased demand
- Capacity constraints
- Supply shortages including inputs & packaging
- Limiting production output to keep workers safe
- Facility closures or transfer of operations
- Organic packaging and labeling requirements



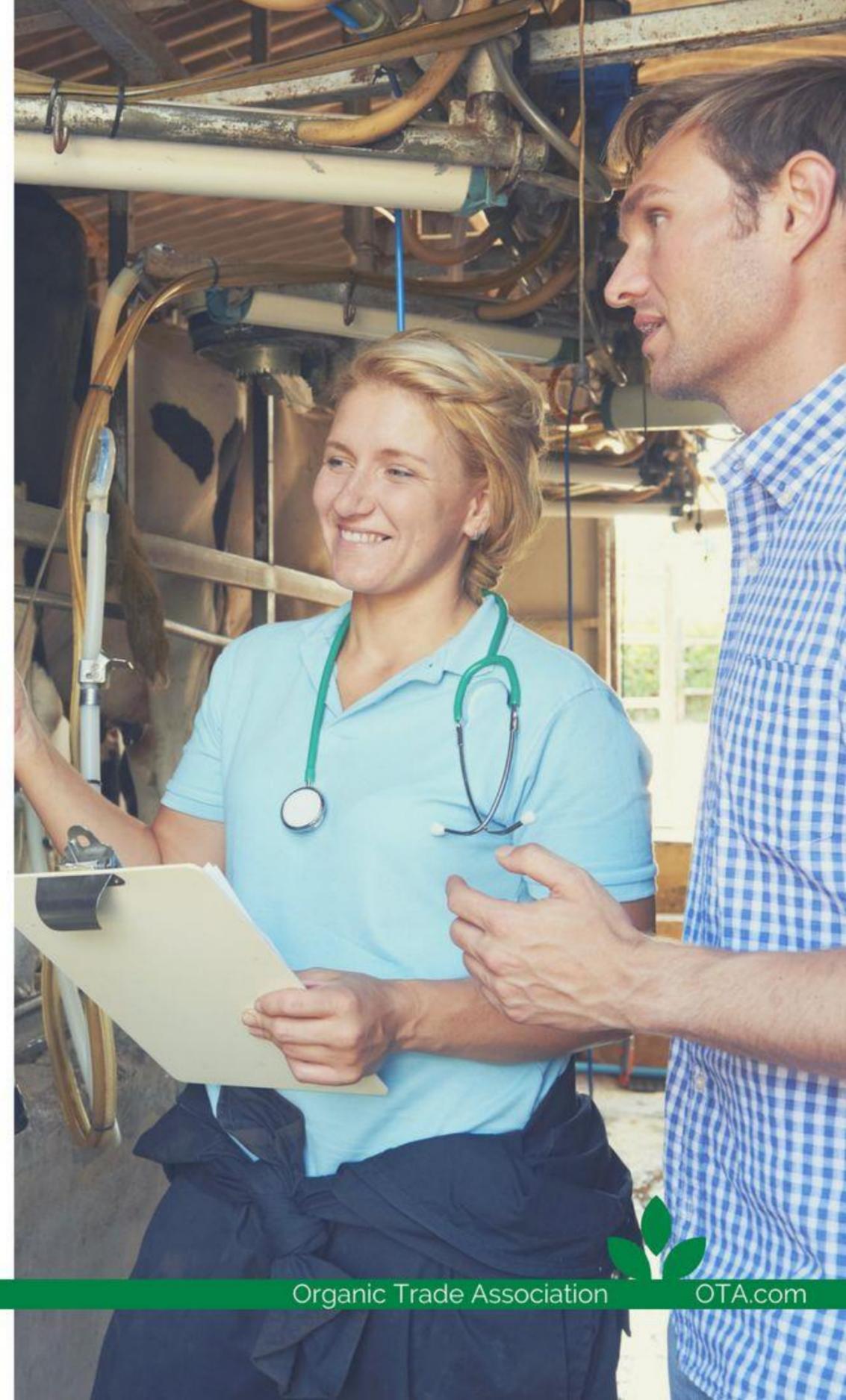
Organic is Unique

Reduced flexibility & unique supply chain challenges when on-site inspections are not possible

- Initial on-site inspections are required under **§205.403(a)(1)**
- Once certified, an operation remains certified until surrendered or revoked - **§205.406**

THE BIG CHALLENGES!

- In many cases, on-site inspections are not possible
- New certification vs. existing certification



Food Safety Inspections

FDA and USDA programs

- **FDA:** Temporarily not enforcing on-site FSMA audit requirements & is allowing on-site only if critical & for cause. Temporarily postponed all domestic routine surveillance facility inspections.
- **USDA APHIS:** Continue to provide critical inspection & grading services
- **USDA FSIS:** Meat, poultry, and processed egg inspection services continue as normal
- **USDA Livestock & Poultry Program:** Shifting completely to off-site remote audits until travel restrictions are lifted



Organic Inspections

International and Private

- **CFIA:** Postponed all planned audits under COR until restrictions on non-essential travel are over. Developed criteria for remote audits to provide flexibility & reduce the need for on-site audits
- **EU Commission:** Authorized CBs to postpone on-site inspections until May 30 & conduct remote inspections (new operations included) w/ combination of virtual, distant physical checks, and desk audits. Full on-site inspections for high-risk operations will resume later in the year
- **GOTS:** Risk-based approach to conducting virtual audits based on certifier assessment. Possible for recertification of existing entities & initial certification of operations that do not include wet processing - extensive GUIDANCE was provided by GOTS



USDA-NOP Inspections



USDA's National Organic Program issued clarification to certifiers in response to current conditions and questions

- USDA remains open for business
- Encourages critical thinking about ways to ensure compliance while maintaining safety
- Emphasizes staying true to the regulations
- Clarifies that a virtual inspection cannot replace an **initial** on-site audit for **new applicants**
- Points to continuation of certification as the place where different risk-based oversight approaches may be appropriate (aka **remote audits**)



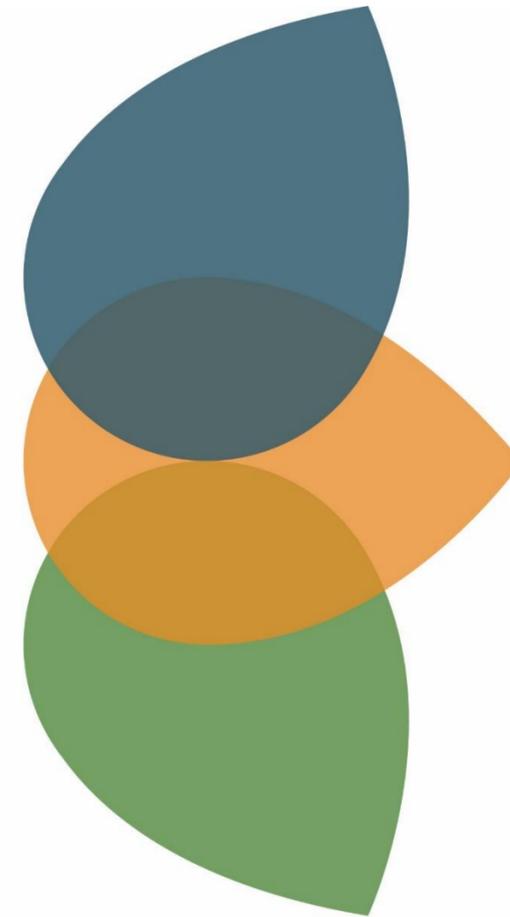
OTA Involvement & Action

The Organic Trade Association is committed to protecting organic integrity and ensuring organic certification continuity

- Submitted a letter to USDA with several ORGANIC specific policy asks related to COVID-19
- Supporting member of the Accredited Certifiers Association
- Participating on the ACA-IOIA Working Group on Contingency Plans for Organic Inspections
 - Today's webinar will present the ACA-IOIA best practices & how to prepare for a virtual audit



accad



Accredited Certifiers Association, Inc.

Consistency and Collaboration
in Organic Certification



Contingency Plans for Verifying Compliance When On-Site Inspections are not Available

Marni Karlin, Karlin Strategic Consulting
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Overarching Principles

- **MUST BE FOUNDED IN REGULATORY TEXT**
- Critical thinking
- General guidelines, tools, and best practices
- Consistent and credible
- Flexible
- Documentation
- Monitor and evaluate – potential for further refining

How did we get here?

- Organic regulations and NOP guidance
- Guidance from other U.S. government agencies
- ISO standards

Definitions

- On-site inspection
- Remote inspection
- Records audit
- Hybrid inspection



Prioritizing Existing Operations for Inspections



- Triage based on time elapsed since last inspection and seasonality
- Process should be flexible and include an operation-specific risk assessment

Prioritizing New Operations for Inspections

- Regulatory requirement for on-site inspections
- Can start with remote inspection and/or records audit, and delay certification decision until on-site inspections may be performed
- New operations should receive high priority for on-site inspections once restrictions are lifted



What Else?

- Garth will be covering remote inspections, stay tuned!
- Directory of Local Inspectors
- Supporting Inspectors During Pandemic

Thank You

Marni Karlin, Karlin Strategic Consulting
marni@karlinstrategic.com



Organic inspection in the wake of Covid-19

Preparing for a “remote” or hybrid organic inspection of your company or facility.

Presented by: Garth Kahl

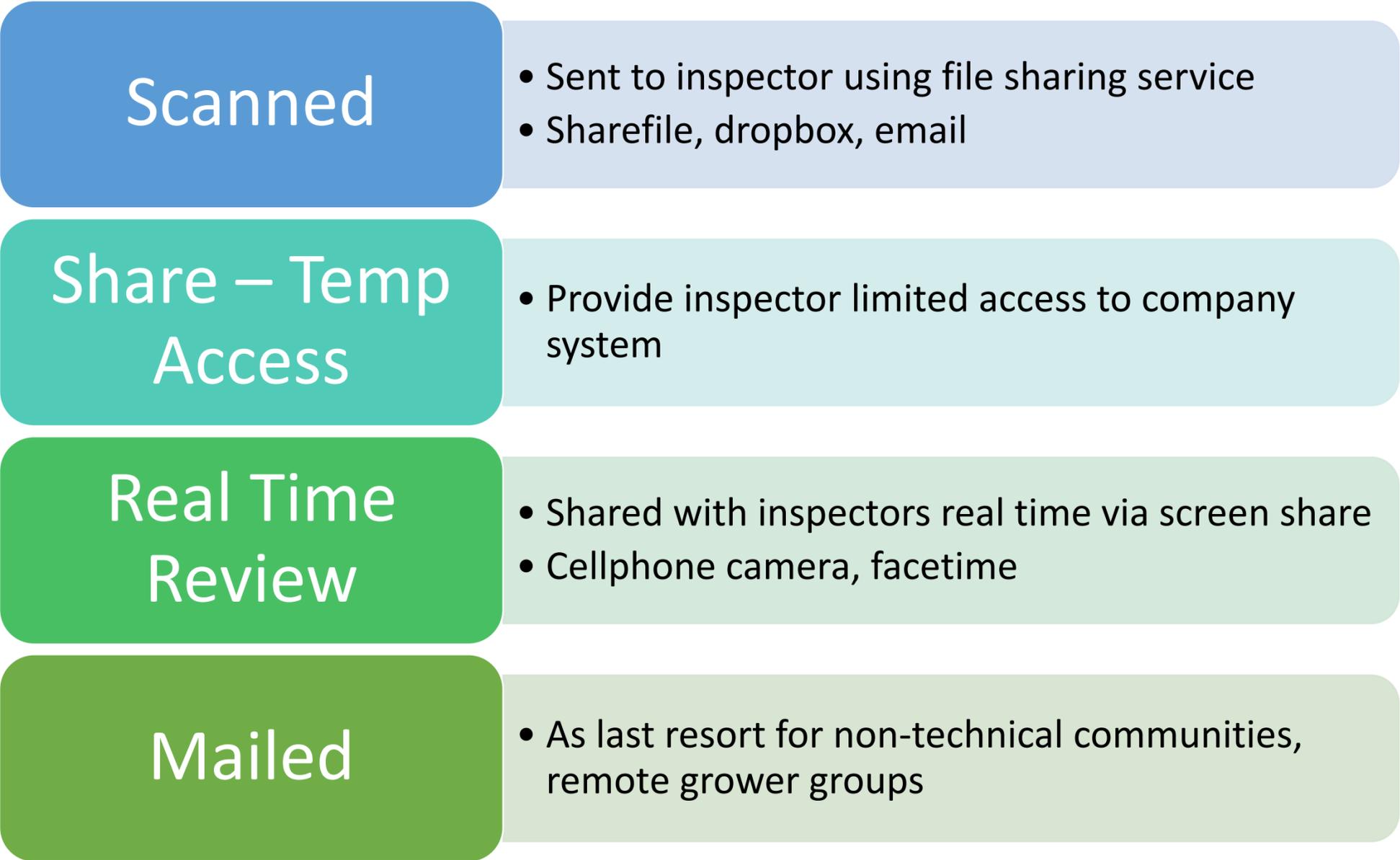
With assistance and materials provided by: Patti Bursten Deutsch, Amanda Birk, Rachael Meyers and Lois Christie

Initial Selection Contact and Inquiry



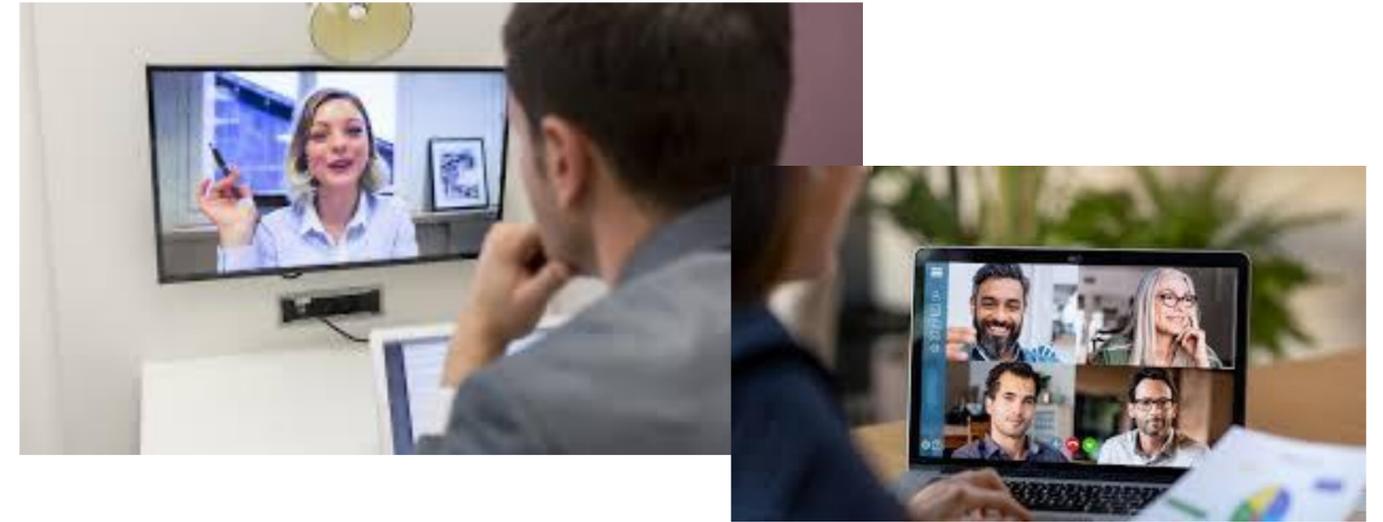
Special Considerations for Determining Needs and Resources

Ensure your organization *has ability to share*, via electronic means: Audit Trail Information (Mass Balance, Traceback, Feed Audit etc.) OSP Updates, Batch records, cleaning logs, etc.



Types of Remote Assessments

Full Remote



Hybrid Inspection



Onsite verification –
socially distanced



Preparing for a Virtual Inspection

Inspectors Initial Contact: Confirm acceptance of remote means

Pre-Inspection Platform Trial: Test conference platform and connections, ensure stability of system.

Preparation: Scan documents, supply to inspector as discussed in inspection plan

Remote Inspection

How to Prepare for a Virtual Inspection

Pre-Inspection

- Prepare and Organize Requested Documents
- Ensure that the facility/fields have adequate Wifi or cell service

The Inspection

- Arrive on time with all necessary staff
- Test camera and microphone
- Ensure file access for records needed for review

Backup Plan

- Plan for redundancy – Technology will fail
- Exchange numbers
- Have passwords and links handy
- Smartphone backup

How to Prepare for a Virtual Inspection Other Considerations

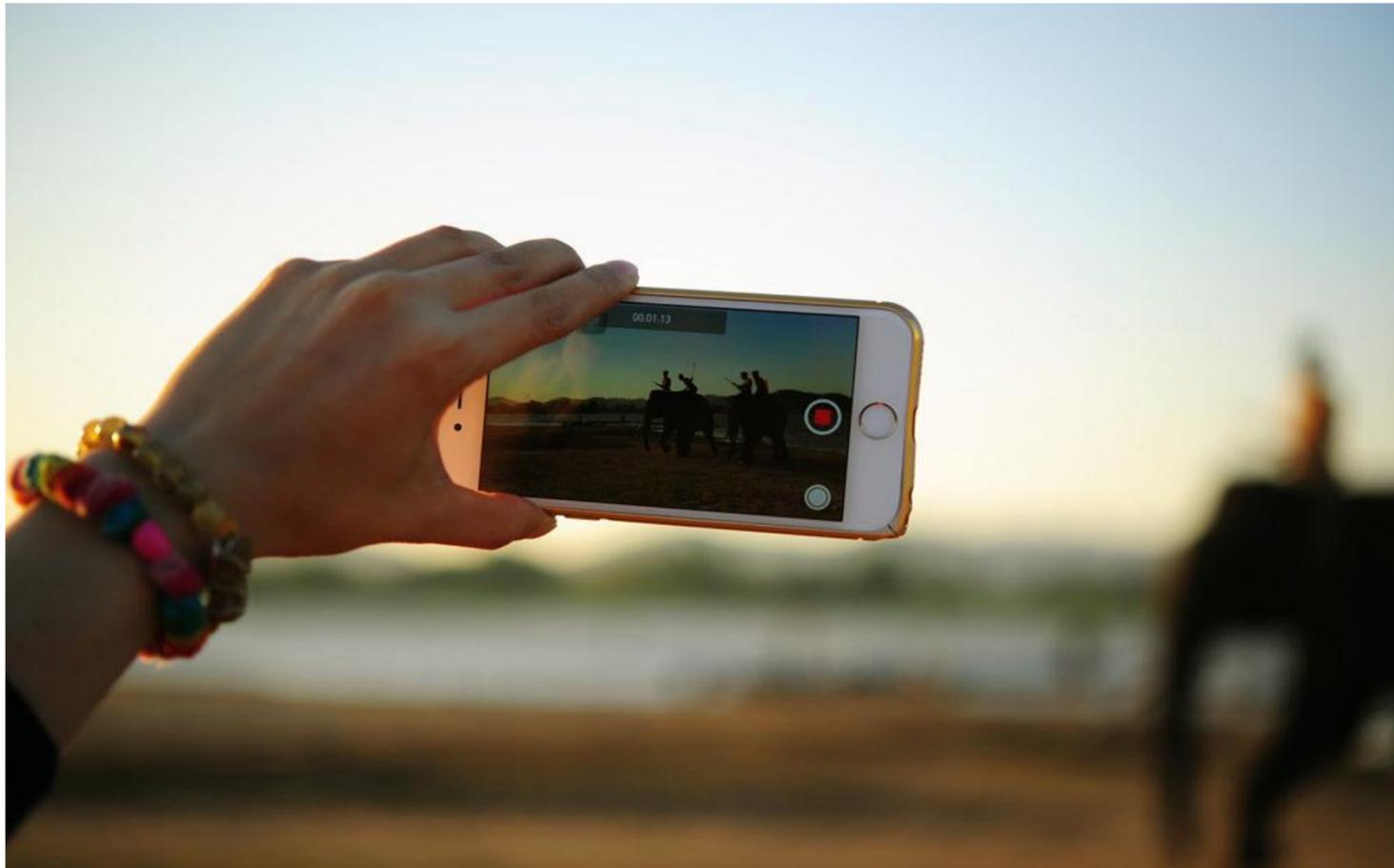


Smart Phones



Security Cameras

Video Tour for a Virtual Inspection



1. Live Video – Inspector Led
2. GPS locator app
3. Potential use of Drones
4. Recorded video if necessary

Exit Interview & Next Steps

Exit Interview Required – may
or may not be same meeting
as inspection

Expect and appreciate
unannounced inspections as a
tool for compliance

Provide certifier feedback

OUR COVID-19 ORGANIC INSPECTIONS

EXPERT PANEL

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ORGANIC INSPECTIONS

QUESTIONS

COVID-19

OTA INVOLVEMENT & ACTION

The Organic Trade Association is committed to protecting organic integrity and ensuring organic certification continuity

- Continuing our outreach to members
- Submitted a letter to USDA with several policy asks related to COVID-19 and impacts on ORGANIC
- CEO, Laura Batcha, gave virtual testimony

Organic certification and inspection continuity:

ASK: During this unprecedented time, it is critical that USDA support the organic marketplace by allowing accredited certifiers to utilize emergency remote inspections when on-site inspections are not possible.

OUR COVID-19 RESOURCES

UPCOMING ORGANIC EDUCATION

Labor Issues &
COVID-19

May 14
2 pm Eastern

COVID-19 &
the Shifting
Retail Landscape

May 21
2 pm Eastern

[OTA.com/COVID-19](https://ota.com/COVID-19)



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