



ORGANIC CERTIFICATION AND INSPECTIONS DURING A PANDEMIC

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AGENDA

- Continuing Certification
 - Hybrid inspections
 - QAI's commitment
- Extending the Scope
 - New products and lines
- Granting Certification
(New certifications)
- Preparing for a
Remote/Virtual Organic
Inspection



CONTINUING CERTIFICATION

What Does The Regulation Say?

“.....when it is impossible for the certifying agent to conduct the annual on-site inspection following receipt of the certified operation's annual update of information, the certifying agent may allow continuation of certification and issue an updated certificate of organic operation on the basis of the information submitted and the most recent on-site inspection conducted during the previous 12 months: Provided, That, the annual on-site inspection, required pursuant to §205.403, is conducted within the first 6 months following the certified operation's scheduled date of annual update.” 7 CFR Part 205.406(b)



CONTINUING CERTIFICATION – QAI’S APPROACH

Where possible, postpone inspection.

- Not to exceed 18 months from previous inspection

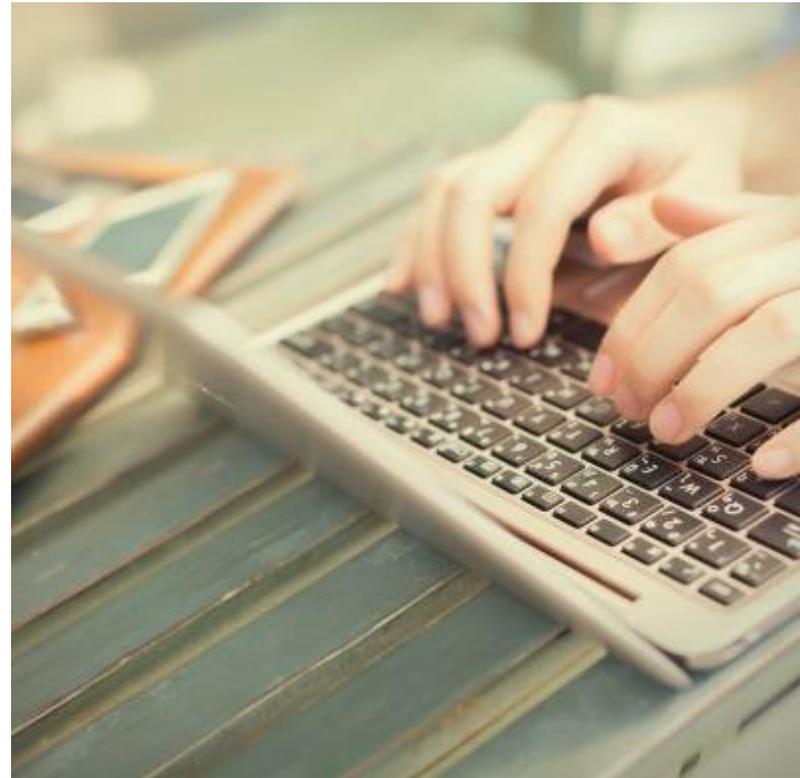
If inspection cannot be postponed, opt for hybrid.

- Document review conducted remotely/virtually
- On-site walk-through of facility within one week of document review
 - Brief
 - No contact
 - Masks and social distancing
 - Objective: To observe facility, production, chemical storage, warehouse areas, pest control log and anything else that could not be done virtually



CONTINUING CERTIFICATION – QAI’S APPROACH

- Full remote/virtual inspection
 - Follow-up on-site may or may not be required depending on how successful the virtual inspection was.
 - Does your operation allow photographs or video of your production areas?
 - Can a mass balance be successfully conducted via screen-share?
 - Follow-up may be conducted as announced or unannounced



QAI'S COMMITMENT

Inspectors must:

- Self-monitor
- Wear appropriate PPE
- Sanitize mobile and electronic devices
- Avoid physical contact
- Avoid close proximity to personnel



EXTENDING THE SCOPE

New products

- Inspection not required, no change to current process.

New lines

- Inspection of new lines, equipment, and machinery can be done virtually.
- Certification can be granted based on virtual alone with the caveat that new lines/equipment/machinery will be included in the next on-site inspection.

New fields

- Hybrid approach if no travel restrictions.
- If travel restrictions, virtual tour of new field(s) is required in addition to the document review.



GRANTING CERTIFICATION OF NEW OPERATIONS



What Does the Regulation Say?

- Initial on-site inspections are required under 7 CFR Part 205.403(a)(1).
- For operations based in Canada and the EU, initial inspections can be conducted virtually.
- Hybrid or fully on-site

PREPARING FOR A REMOTE/VIRTUAL ORGANIC INSPECTION



- Regulations require operators allow certifying agent access to records for review and copying 7 CFR Part 205.400(d).
- Records may be shared via e-mail, document-sharing system, screen-share or “snail” mail for nontechnical communities.
- Test the system that will be used to conduct the virtual/remote inspection.
- Notify inspector of any issues with sharing photo, or video of production areas.
- Prepare documents for sharing as necessary.

HAVE THESE DOCUMENTS READY FOR YOUR VIRTUAL/REMOTE INSPECTION

- Organic System Plan and product profiles
- Product labels
- Supplier organic certificates
- Non-organic ingredient compliance documentation
- Standard operation procedures
- Process flow diagram
- Batch records
- Bills of lading
- Receiving records and purchase invoices
- Sales and shipping records
- Inventory records
- Cleaning records
- Test results, as applicable
- Pest control log
- Training records
- Complaint log
- Registrations/certificates from health authorities
- Status of corrective actions/preventive actions from previous non-compliances



THE END

QUESTIONS?

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