



International Organic Inspectors Association
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An IOIA White Paper: Solving the Organic Certification Paperwork and Process Logjam

IOIA strongly supports reduction of unnecessary paperwork in the organic certification system as paperwork often consumes more than half the time spent at the on-site inspection. And as we explain below, there are other significant paperwork logjams as well. IOIA seeks to shift the focus from processing paperwork to the certification process and the inspection itself provided, of course, that the integrity in the organic label is maintained.

Documentation is a recognized aspect of what distinguishes and adds value to ‘certified organic’. Consumers deserve to know that organic product can be traced back to the inputs, the seed, and the grower who produced it. However, an over-reliance and over-emphasis on paper documentation weakens rather than enhances organic integrity.

Among the issues certifiers and inspectors face is confusion and duplication of work caused by conflicting and overlapping requirements. Operators need training and help with documentation. And inspectors need more latitude in assessing what is required of operators. Paperwork handling processes are an issue as well. Documents may be reviewed as many as three times. And outdated documents circulate between parties when updated documents would suffice.

The problem has reached the point where we believe that a significant increase in certification would cause current systems to collapse under the paperwork burden.

But changes can only happen with the support of the NOP. Paper document requirements need to be identified and agreed upon by the NOP, NOSB, ACA, and IOIA; all working together to achieve a better system.

In this paper we describe the paperwork problem, consider the problem, and offer specific solutions. Each of the three major sections addresses topics related to the **Organic System Plan**, then **Redundancy**, and finally the **Inspection, Review, and Decision Processes**.

PROBLEM

A major consequence of the paperwork burden is that it discourages producers from seeking organic certification, while increased requirements for documentation frustrate currently certified operators.

Organic System Plan (OSP)

- If an operator has instituted a new compliant practice and has not updated their OSP, the Certifying Agent is required to issue a notice of non-compliance. In addition, notices of non-compliance are often issued for very minor items.
- Operators regularly submit incomplete OSPs.



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- Many operators are untrained in the requirements of the NOP regulations or what is expected of them by the certifying agency.
- On-site documentation is often prepared by the operator specifically for the inspection rather than being kept current throughout the year.
- Inspectors often receive incomplete OSPs.
- Inspectors are not allowed to update OSPs at the time of inspections, nor are certification agencies allowed to update OSPs at the operator's request.
- A great deal of documentation is created at inspections to verify what is being said.
- It is not always clear what documents inspectors are to collect, with considerable variation in the expectation of each certifier.
- It is not clear what can and cannot be verified without documentation. through operator interview or inspector observation
- Not all annual or other updates integrate smoothly into OSPs.
- There is a lack of consistency between certifying bodies with respect to the OSP and other documents that must be collected. Protocols and documentation requirements are not standardized.
- There are matters such as seed searches that do not need to be documented but can be verified in other ways.

Redundancy

- Outdated documents are often not retired but continue to circulate with an operation's file.
- Identical documents are often duplicated and re-submitted annually to certification agencies
- Audit Trail documents are often reviewed at the inspection and may also be submitted to the certification agency for review.
- The bulk of an operation's documentation is reviewed by three parties: initial reviewers, inspectors, and final reviewers.
- The inspector often duplicates the work of the certifier and vice versa.

Inspection, Review and Decision Processes

- Inspectors spend a considerable amount of time on paperwork, filling out forms and auditing records at the expense of observing what is happening at the operation.
- A great deal of paperwork is created and collected at the inspection when an incomplete initial review is released for inspection or if there are extensive preliminary items from the initial review for the inspector to address.
- Operators feel frustrated when asked for documentation for things such as seed searches when they have numerous catalogues on the table.



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- Operators often see the inspector as a policeman; this attitude can lead to communication barriers in the process.
- Inspectors and certifying bodies refrain from advising operators on how to solve their documentation problems.
- When personnel are not educated sufficiently, they may not fulfill the agency's expectations or fulfill the job they have been assigned. This causes discord within the process.
- Operators often print volumes of organic certificates for review by an inspector and reviewer, which are time-consuming to review.
- Protocols do not differentiate based on risk or size. As a result, small, low risk growers are required to prepare paperwork that is less applicable to them than it is to larger operations.
- USDA NOP witness audits are not standardized. Some auditors expect more documentation than others.

CONSIDERATIONS

Organic System Plan (OSP)

- The OSP should be regarded as a living document that belongs to the operator and is their responsibility to keep it up-to-date.
- Electronic systems are a convenient tool for many operators, reviewers and inspectors although a massive electronic file is not a decrease in documents. "Virtual" paper can be as burdensome and unnecessary as physical paper.

Redundancy

- We learn from the farmers, certifiers, reviewers and inspectors we follow, what they focused on, how they spent their time. We can choose to follow up on specific issues or look elsewhere in order to verify compliance. Sometimes this may mean more documentation verification and at other times more observational verification.
- Presently the organic industry requires physical documentation to verify nearly every operational practice. This causes invariable overlap between documentation kept or created by producers and what is required for the inspection and what is forwarded to the certifier.

Inspection, Review and Decision Process

- When an inspector receives an incomplete or inadequately reviewed file, the burden is passed on to the inspector to clear up during inspection. This consumes valuable and relatively limited inspection time.



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- When an initial reviewer, an inspector and a final reviewer review a file all three must take the time to become familiar with the operation.
- If the organic verification system becomes less focused on paperwork, witness audits will become an even more essential component of making sure the system is working.
- As regulations have become more complex and certifier paperwork has increased, inspectors have been expected to continue to do inspections at the same rate of time. Expectations regarding the length of time an inspector needs to complete DMI calculations and feed audits, for instance, are not always realistic.

SOLUTIONS

- Create a collaborative relationship between the NOP, certifiers, inspectors and organic operations to establish and encourage better practices.
- Create a joint effort between NOP/NOSB/ACA/IOIA to assist in revising the Penalty Matrix that could reduce the paperwork burden.
- Non-compliance notifications should be reserved for issues affecting the integrity of the organic product.
- NOP should develop guidance for certifiers on appropriate ways to provide support and training for certified operations.
- Develop a pilot program to support simplified inspection reporting, OSP updating and documentation for small, low risk growers who market directly to customers.
- Training should be available for operators regarding the rules and certifier expectations.

Organic System Plan (OSP)

- Allow inspectors to update OSPs during the inspection provided this is not used as a substitute for proper review protocol.
- Inspectors need to perform full physical inspections and report on actual practices observed, physical appearances of the processes occurring, and conversations with operators. These practices need to be accurately described in the OSP.
- Combine the OSP, inspector report, and final review, into one document used for all three functions.
- Use technology to simplify the certification process. This does not mean the same amount of paperwork. Electronic files can be set up to reduce paperwork -- when submitting updates, for example.
- OSPs should be set up for simple, dated revisions that easily integrate into the operation's file.
- Operators need training in completing the OSP and additional documentation which is required of them.
- OSP management goals should include efficiency, relevancy, and distillation of the documentation itself.



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Redundancy

- The annual update could consist of a descriptive section, which is general enough that it does not change annually, but specific enough that it shows how the operation will meet all requirements of the regulation. Add variable sections, which do change annually and are submitted with renewals (seed, rotation, etc.).
- Lists of crops, acres, and non-perishable crops in inventory should be verified for accuracy and updated at inspection if necessary and provided to the certifier. These could be electronic-friendly forms that could be completed off-line and uploaded later.
- Maps are only needed once, but they should be good maps in color, and include an overview farm map. Photocopied maps in black and white become illegible.
- Materials List may be needed every year even if there are no changes.
- Field history needed every year for annuals; not needed annually for Perennials.
- Seed Lists can be reviewed at the inspection. This is a particularly onerous form for small diverse vegetable growers to complete, especially early in the season.
- Eliminate the Organic Seed Non-Availability Affidavit or Organic Seed Search Document. Place the emphasis on a thorough seed search that the inspector can verify.
- A livestock list should be maintained on-site, verified, updated at inspection, and collected by the inspector. Operators should maintain their own system and be prepared to provide the list at inspection.
- In addition to these documents, the OSP Update form could be a simple, single form where the operator is instructed to list all the changes, with a reference to the OSP section and number. This works for a wide variety of OSP forms.

Inspection, Review and Decision Process

- Operator interview and physical measurements are alternative forms of verification. Currently, IOIA teaches inspectors that recorded documentation is often essential to demonstrate compliance.
- Clarify what constitutes verification: email, hardcopy documentation, verbal assurances, visual observation, etc.
- Improve qualifications and quality of reviews. Educate reviewers to understand the inspection process and communicate well with operators.
- The initial reviewer could be the inspector or the initial and final reviewer could be the same person. This allows familiarity between two of the three steps and can be more efficient than two separate reviewers.
- Inspectors need to understand and follow agreed upon inspection protocols for each certifier.
- Inspectors and reviewers must be efficient, not request more paperwork than they need, and have adequate education for their respective jobs.
- Certifiers and reviewers must allow and encourage inspectors to review documentation onsite removing the reason to forward the same document to the certifier. Audit trail



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- documents are reviewed and reported on by the inspector so a successful review should not include forwarding the documents to the certifier. Organic product certificates for ingredients or inputs can be reviewed by reviewers or inspectors, pre, post or during inspections.
- USDA witness audits must be performed by auditors trained in standard organic inspection protocols and should be based less on paperwork and more on observation of the operation.
 - Certifiers and inspectors should be able to support and enable operators to comply with the NOP standards as stated in 205.501(a)(8) offering latitude to assist operators in complying with regulations.
 - More unannounced inspections can reduce the emphasis on paperwork and enhance organic integrity. Unannounced inspections could be used to better monitor practices with a regular inspection addressing the audit trail. Unannounced visits can also serve as the annual inspection.

CONCLUSION

Clearly, there are opportunities to reduce the paperwork burden and to streamline paperwork handling processes. Achieving both would contribute to the viability of current systems and would enhance the validity of organic certification. An over-emphasis on paper documentation actually weakens organic integrity. Plus, making everything about the certification process less cumbersome would encourage wider operator participation.

IOIA proposes a super committee including representatives from all sectors of the organic industry; Operators, Certifiers, Reviewers, Inspectors, NOSB, and the NOP including the USDA NOP Auditors to decide what can be changed and how best to set priorities and manage that change.

The goal should not be to simply streamline and reduce paperwork. The larger goal should be to achieve greater consistency in standard protocols and expectations for all levels from operators to reviewers and inspectors to decision-makers at the certifiers and to the accreditor at the USDA NOP. We can accomplish both once there is general agreement that constructive improvements to documentation requirements and administrative systems are both imperative and feasible.

IOIA stands ready to participate in this process. We look forward to contributing the unique and valuable perspective of those who are often the only representatives of the organic certification system who are on-site at the certified operations – organic inspectors.