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Guidance on Organic Inspector Qualifications

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Summary and Background

With rapid growth in the organic industry, certifiers experience a pressing need to recruit, train, and oversee new organic inspectors. Within the National Organic Program (NOP) regulations, section 205.501(a)(1) states that certifying agents and their staff must “have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program under the Act and the regulations...” On April 27, 2012, the Deputy Administrator of the NOP issued a statement to accredited certifying agents stressing the importance the role organic inspectors play and the importance of assessing candidates to ensure appropriate expertise. At that time, the NOP planned to release draft guidance on specific qualifications. However, this draft guidance has not yet been provided. In the meanwhile, certifiers have implemented varying criteria for training and assessment of new inspectors. The ACA assembled a working group to develop guidance for increasing consistency in terms of training, knowledge, and experience of inspectors across certification agencies. With that goal in mind, the working group was also conscientious to avoid outlining recommendations so rigid that they would disqualify good inspectors from alternative backgrounds. As such, it is noted that the document may not be inclusive of all useful skills and knowledge and might not necessarily disqualify an inspector who possesses alternative attributes deemed appropriate by certification agencies.

In this document, ACA inspector criteria are considered within the four scopes of the National Organic Program (NOP) Regulations, i.e., crop production, wild crop harvesting, livestock production, and handling. The document also provides suggestions for continuing education and evaluation of experienced inspectors.

These recommendations are based on a draft document produced by the International Organic Inspectors Association (IOIA) for the NOP, “Criteria for Inspectors and Reviewers working for NOP Accredited Certifying Agencies,” which was used with the NOP’s permission.

Knowledge

There are six bodies of knowledge and facts required of organic inspectors.

- a. Regardless of the type of inspection (crop, wild crop, livestock, handling), a good understanding of inspection (auditing) techniques and protocols is required.
- b. Inspectors must have a demonstrated understanding of organic certification and inspection processes, knowing their role and limitations within them.

- c. Specific to the inspection scope, a demonstrated understanding of the applicable organic regulations (CFR Title 7 Part 205 NOP and OFPA) are required. This does not just mean knowing what the regulations say and where to find it, but most importantly, how to apply the regulations to practical situations. The inspector must be able to explain applicable standards and certification procedures to the operator.
- d. Sufficient understanding of production/handling processes and the capacity to evaluate process flow is a critical requirement. Knowledge of current practices in an operations conventional counterpart is a necessary tool for organic inspectors, enabling effective identification of risks to organic integrity in the organic production/handling process.
- e. Inspectors should be proficient – and current – in their understanding of the specific procedures, documentary requirements and forms of each certifier for whom they work. Certifiers each have their own versions of Organic System Plans and Inspection Report formats, as well as their own methods of organizing the OSP information such as organic product recipes, input profiles, and finished product labels.
- f. Organic inspectors should be aware of other rules and regulations applicable to the inspection scope, notable food safety requirements. Although such regulations are technically beyond the scope of organic inspections, if the organic inspector observes obvious violations of them, they are typically addressed in an addendum to the inspection report, for the certifier’s attention.

Skills/Areas of Expertise

Several skills (areas of expertise) are needed to conduct organic inspections and enable the organic inspector to fulfill inspection assignments effectively and efficiently.

- a. **Observation skills:** When conducting evidence-based inspections, a significant part of the on-site time is spent in the field or on the production floor, understanding the ‘big picture’ of a production system and observing the details which support (or contradict) the Organic System Plan.
- b. **Communication:**
 - 1. **Interviewing** is a technique inspectors use to gather information so appropriate interviewing techniques are required. Some good interview techniques are ¹ asking open ended questions, asking the same question a different way and paraphrasing.
 - 2. **Documenting/writing**²: This includes correct grammar and spelling; accurate writing that is clear, concise, and easily understood by the operator and reviewer; facts vs. opinion; reference supporting documentation; citation of appropriate NOP regulations; and explanation of issues of concern.
 - 3. **Active listening:** Active listening is a structured way of listening and responding. The elements of active listening are comprehending, retaining, and responding. The listener asks questions and paraphrases back to the speaker to clarify understanding. Listening carefully to operator responses reduces redundancy during the inspection, improves accuracy, and shows respect.

¹ IFOAM/IOIA Inspection Manual 2.3.5; ASQ Auditing handbook; ISO 19011 6.5.4

² ISO 19011 6.6.1; ASQ Auditing Handbook p 141

- c. **Intermediate Math skills:** Inspectors need to be able to convert easily from one unit of measure to another, calculate yields, calculate annual feed requirements in livestock operations, use formulas to verify in/out balances, and use percentages to validate recipes and production reports etc.
- d. **Organization and time management**³: managing preparation time, travel time, on-site time (e.g., multiple sites) and reporting time efficiently; respect certifier deadlines; use travel resources efficiently. Inspectors need to plan well, be prepared⁴, and be on-site at a time when organic operations can be verified⁵. The inspections must be conducted with the authorized operator representative is present, moving smoothly from one area of operations to another.
- e. **Information management** skills ⁶ are required, both in the office and on-site. Specific risks and conditions to certification are flagged in the preparation before inspection; these areas must be properly investigated, observations noted in an orderly way, and conclusions communicated to the certifier. Evidence of potential non-compliances must be substantiated, documented, tracked and accurately reported. Working documents need to be kept secure, archived and/or destroyed⁷, as appropriate. Basic computer skills including demonstrated proficiency in word processing, use of spreadsheets and database management may be required by individual certifiers.
- f. **Investigative skills** ⁸are required for all inspections, and especially those where the inspector finds inconsistencies during the on-site inspection (i.e., if prohibited substance use is suspected), when conducting complaint related inspections and in cases of suspected fraud.
- g. **Sampling procedures:** Correct sampling methods, appropriate handling of samples (packing, labeling, shipping) and proper chain of custody impact the validity of test results. These activities must be done according to the certifier's policies and contracted laboratory procedures. Individual certifiers may not require all inspectors to be trained on sampling procedures. An inspector must only take samples if they have been trained and are authorized by the certifier.
- h. **Skills specific to inspection scope:** Additionally, numerous skills specific to the scope of the inspection are required. The following table gives several examples for each scope but this list is by no means exhaustive.

³ ISO 19011 7.3.1; ASQ Auditing Handbook

⁴ ISO 19011 6.4.1 and 6.4.3

⁵ NOP 205.403 (b)(2)

⁶ IOIA Training program guide; ACA inspector position descriptions

⁷ ARC job description, IOIA training manual

⁸ ISO 19011 7.3.1; ASQ Auditing Handbook p 141

Inspection scope	Examples of skills specific to inspection scope. Skills outlined in Wild Crop and Livestock scopes are <i>in addition</i> to skills needed for Crop Scope.
Crop	<ul style="list-style-type: none"> ● ability to recognize weeds and assess impact ● ability to assess production capacity ● ability to assess soil structure and fertility by consulting soil test results, observing crop performance and observing signs of compaction, good tilth etc. ● ability to assess possible sources of contamination and recognize signs of pesticide injury to crops or other vegetation⁹ ● ability to assess natural resource conservation and biodiversity ● ability to assess crop rotations and management of pasture as a crop ● ability to evaluate farm inputs ● ability to evaluate manure and compost management
Wild crop	<ul style="list-style-type: none"> ● ability to assess sustainability of harvesting practices ● ability to read maps ● ability to recognize possible source of contamination and signs of damage to wild crops or other vegetation ● ability to determine damage to harvested crop and dependent species (plant and/or animal) by harvesting or over-harvesting¹⁰ ● ability to assess natural resource conservation and biodiversity
Livestock	<ul style="list-style-type: none"> ● ability to calculate dry matter intake for ruminant animals ● ability to assess native and tame pasture production ● ability to assess overall condition of herd/flock (animal behavior, physical appearance) ● ability to assess adequate nutrition and evidence of malnutrition or parasites etc.¹¹ ● ability to assess pasture quality and grazing practices for ruminant animals ● ability to assess the general animal husbandry practices used for species on operation ● ability to assess inputs for farms with livestock ● ability to assess feed handling procedures to avoid contamination on split operations

⁹ IFOAM/IOIA International Organic Inspection Manual 4.1.1

¹⁰ IFOAM/IOIA International Organic Inspection Manual 4.8

¹¹ IFOAM/IOIA International Organic Inspection Manual 5.1.2

Inspection scope	Examples of skills specific to inspection scope. Skills outlined in Wild Crop and Livestock scopes are <i>in addition</i> to skills needed for Crop Scope.
Handling	<ul style="list-style-type: none"> ● ability to compare proposed recipes, actual production and finished product labels ● ability to verify compliance of organic ingredients, non-organic ingredients, food additives and processing aids ● ability to assess compliance of facility pest management protocols ● ability to assess equipment for commingling or contamination potential ● ability to assess label compliance ● ability to assess production capacity ● ability to identify and report major and obvious food safety concerns ¹²

Abilities (capacity, talents)

Beyond knowledge and specific skills, it is recommended that organic inspectors develop certain abilities to facilitate their work:

- a. Analytical
- b. Accuracy
- c. Consistency
- d. Attention to detail without losing sight of the whole
- e. Ability to differentiate between technical assistance, inspection and consulting¹³
- f. Discernment¹⁴: ability to differentiate between evidence and opinions¹⁵
- g. Judgment: ability to interpret and adapt general guidelines to specific situations
- h. Awareness of trends and developments in conventional and organic aspects of agriculture or food science
- i. Self-assessment: ability to recognize own opportunities for improvement, can accept constructive criticism and ask for a second opinion when the situation exceeds their knowledge capacity.

¹² IFOAM/IOIA International Organic Inspection Manual 6.2 and 6.3

¹³ NOP 205.501(a)(11); IOIA curriculum; NOP 2614 Technical Assistance

¹⁴ ISO 19011 6.5.5; ASQ Auditing Handbook p 141; IOIA Training program guide

¹⁵ IOIA curriculum

Personal Attributes

Inspectors should possess personal attributes¹⁶ to enable them to perform inspections in accordance with principles of auditing. An inspector should be:

- a. *Honest and ethical.* Integrity of the certification system rests on the integrity of its players, including inspectors and reviewers. In quality systems, inspectors must be free of conflicts of interest with the operations for which they inspect. Conflicts of interest are declared annually¹⁷ and inspectors should defer any inspection assigned to them by a certifier with which they have a conflict of interest. Confidentiality¹⁸ is also important. Information learned about operations must be kept confidential in order to gain trust of operators and not be used by inspectors for personal gain. Inspectors also have a responsibility to report suspected fraud.
- b. *Impartial and non-discriminatory.* Inspectors should be fair and objective¹⁹ during inspections and when reporting their observations to certifiers. Inspectors should be open-minded to the types of people and management strategies they encounter. They need to treat all operators with respect and without bias. An inspector should also be aware of the cultural environment in which he/she is working.²⁰
- c. *Professional in their conduct.* Inspectors must be fit and in good mental health. As most inspectors work alone, they need to be self-reliant and able to function autonomously and decisively. During the inspection, the inspector represents a certifier and must follow certifier policies and procedures. They must follow all governmental laws that apply to their status, whether employees or contractors (ex. valid driver's license, reporting income, etc.) They should be punctual for appointments as well as meeting certifier deadlines. Inspectors should wear appropriate attire, pay attention to biosecurity requirements, and have an awareness of personal safety. They should turn down work if too busy or if a proposed assignment is beyond their realm of competence. Inspectors must be willing to travel and should strive to efficiently group inspections in order to meet the expense expectations of the certifier. Timely, thorough response to certifier inquiries, and communication related to inspection status, scheduling, etc., is critical.

¹⁶ This is a compilation from a variety of sources: NOP Regulations; ISO 19011 6.6.2 and 7.2; ASQ Auditing Handbook; Codex Alimentarius 6.6.a; ISO 65 4.2.f; IOIA Codes of Conduct and Ethics, IOIA training program guide; IOIA crops and handling curriculum; IFOAM Accreditation Criteria 1.4.11; and ACA inspector position descriptions.

¹⁷ NOP 205.504 (c)(2) requires that inspectors file an annual conflict of interest disclosure report form, identifying any food or agriculture related business interests, including business interests of immediate family members that cause a conflict of interest.

¹⁸ NOP 205.501 (a)(10) requires inspectors hold information confidentially.

¹⁹ The USDA prohibits discrimination in all its programs and activities on the basis of race, color, national origin, gender or marital status (not all prohibited status apply to all programs),

²⁰ IOIA promotes a 2 defect guideline when inspecting foreign operations (see IOIA Code of Conduct and Ethics, which refers to knowledge of culture, language and crop.) Also addressed in ARC job description.

- d. *Curious and tenacious.* Asking open-ended questions is an important method used by inspectors to gather information. They must be curious about the systems they are observing in order to ask appropriate questions. They also must be systematic and continue asking questions until they have a good understanding of whether an operation is in compliance.
- e. *Perceptive and versatile.* Inspectors must be perceptive to quickly grasp an understanding of the variety of operations they encounter. They should have the flexibility to adjust to different situations and people.
- f. *Diplomatic.* Inspectors must strive to maintain a pleasant and non-confrontational atmosphere throughout the inspection even while asking difficult questions and responding to conflict. The inspection can be an exhausting process for the operator. It covers many areas of his/her operation in a relatively short period of time and patience of the operator may wear thin.
- g. *Support goals of organic farming and handling.* This last personal attribute is important as the attitude of the inspector toward his/her work is evident to the operator during an inspection. A lack of support can undermine the authority needed by an inspector.

Work Experience

Organic inspectors should have a **minimum of one year work place experience in the scope**²¹ in which they will be inspecting. Examples of possible workplace experience are given below:

Inspection scope	Examples of workplace experience
Crop	<ul style="list-style-type: none"> ● Growing up on a farm and actively participating in daily and seasonal tasks ● Operate own farming operation ● Employment on farming operation ● Farm manager ● Agricultural educator ● Other applicable industry experience
Wild crop	<p>In addition to experience as a crop inspector:</p> <ul style="list-style-type: none"> ● Experience as harvester of wild crops ● Work in a field of natural resource management ● Other applicable industry experience
Livestock	<p>In addition to experience as a crop inspector:</p> <ul style="list-style-type: none"> ● Growing up on a livestock farm and actively participating in daily and seasonal tasks ● Operate own livestock farming operation ● Employment on livestock operation ● Livestock farm manager ● Herdsman ● Veterinarian or veterinary assistant ● Extensive 4-H or FFA experience ● Agricultural educator

²¹ IOIA training prerequisite

	<ul style="list-style-type: none"> ● Other applicable industry experience ● Experience appropriate to scale and production system
Handling	<ul style="list-style-type: none"> ● Production worker in food processing facility ● Management or shift foreman ● Employment in food retail and/or preparation ● Research and development in food processing ● Food science educator ● Other applicable industry experience ● Site appropriate experience in assessing compliance

Training

It is recommended that five kinds of training be required before beginning supervised inspection work:

1. Education in the scope
2. General auditor training
3. Standards training
4. Specific organic inspection training
5. Training to certifier procedures and paperwork

Initially, this training will be intense and over an extended period of time. As inspection experience is gained, training will take the form of refresher courses or specialty modules, addressed below in the section called “Recommended Professional Development Activities.” Initial inspector training requirements are summarized in the table below.

Training Topic	Recommended Training
Sector education	<ul style="list-style-type: none"> ● College degree in agriculture or food science or related field, or relevant workplace experience
Auditor training	<ul style="list-style-type: none"> ● ISO auditing overview or equivalent auditing protocol training (1-2 hours)
Standards training	<ul style="list-style-type: none"> ● Basic standards training <ul style="list-style-type: none"> ○ Crop (6 hours) ○ Wild Crops (Crop Training +1 hour focused wild crop training) ○ Livestock (6 hours) ○ Handling (6-8 hours)
Organic inspection training	<ul style="list-style-type: none"> ● Basic organic inspection training in appropriate scope (IOIA level 100 or equivalent.) 4.5 days/scope²² ● Recommended: 2-3 mentored inspections or IOIA Field Training, and 7 monitored reports.²³ The inspection performed at the IOIA Basic

²² IOIA basic trainings have traditionally been 4.5 days per scope, on site (not web-based), with 4 days of instruction and 0.5 day of testing

²³ Note: It is not feasible to apply all requirements, especially field training, to the wild crop scope separately from crop. It is recommended that any inspector qualified to inspect crops could also inspect wild crops, provided they received training specific to wild crop standards and inspection. At this time, wild crop inspection has been included in 100 level training content. Specific 200 level wild crop training could be required for wild crop inspection.

	<p>Training could count toward number of monitored inspection reports, but not the number of mentored inspections.</p> <ul style="list-style-type: none"> • Certifiers might utilize different processes for determining what mentoring and monitoring looks like at their organization. • A field evaluation as a “capstone” to the mentoring process can provide clarity about inspector readiness to inspect independently. • Qualifications for mentoring inspectors will be determined by the certifier. Mentors should be highly experienced in the specific scope.
Certifier procedures	Training to certifier procedures and paperwork

It should be noted that the above training recommendations apply to brand new inspectors, or inspectors who are brand new to a scope. Inspectors who are simply new to a specific certification agency will require training on the new certifier’s paperwork and procedures, along with routine quality monitoring.

Specialized training is required for inspectors dealing with:

- Operations that handle imports and/or exports.
- Operations with complex recipes and correspondingly complex in-out balances.
- Long or complex supply chains, especially when certified organic ingredients/product are sourced through uncertified handlers.
- Operations in which fraud is suspected, especially to ensure the Inspection Report will withstand legal scrutiny.

Certification agencies need to be sure their Organic System Plans clearly capture the necessary details prior to inspection assignment.

Inspection Experience

Only in exceptional circumstances can a perfect combination of knowledge, skills, abilities, personal attributes, prior work experience and training be sufficient to autonomously conduct organic inspections. Some certifiers ensure that new inspectors are mentored by experienced inspectors. Inspections are conducted by the apprentice under supervision of the mentor; exit interview documents and reports are written by the apprentice but approved and co-signed by mentor.

Furthermore, it is recommended that beginning inspectors should only be assigned simple inspections. Certifiers should have a systematic way to document the level of inspector and the corresponding level of complexity of the operations they have been assigned. In this way, operators will work with inspectors sufficiently trained for their type of operation, inspections will be efficient, and organic compliance issues will be systematically addressed.

Performance Evaluation Standards

Annual performance evaluations contribute to the continuous improvement of inspectors as well as being a requirement pursuant to the NOP Final Rule, 205.501(a)(6) and 205.510(a)(4). Observation during inspection by a representative from the certifier would be periodic but not

necessarily annual. Observation during inspection may also include an inspection witnessed by a peer (another inspector). An evaluation checklist (attached) has been developed by IOIA with feedback from a number of certification agencies, and may be used for evaluation with permission from IOIA. Alternatively, evaluation forms may be developed by individual certification agencies. The below tables provide competencies to be evaluated in three categories along with evaluation criteria and method of evaluation.

	Area of Competence to be Evaluated	Evaluation Criteria	Evaluation Method
Responsibilities	Review file and assignment from certifier; prepare an inspection plan and make arrangements with operator, taking care to schedule the inspection at a time in the production cycle when organic operations can be observed	Inspection well-prepared (audit plan, checklist for use during inspection); Inspection appropriately scheduled.	Feedback from operators; Observation during inspection; Interview inspector.
	Conduct an opening interview with the operator and relevant personnel	Opening interview covers essential elements (scope, audit plan, safety/bio-security, confidentiality, verifying accuracy of information provided, etc.	Observation during inspection.
	Verify accuracy of OSP and all other information, with particular attention to areas where organic integrity is at risk (buffers, inputs, split operations)	Organic Control Points systematically verified. Materials appropriately reviewed.	Observation during inspection. Review of inspection report.
	Verify production/handling capacity (yield estimates); conduct on-site inspection of in/out balance and traceability	Record keeping system assessed. Random trace back conducted. In/out balance completed.	Review of inspection reports. Observation during inspection.
	Verifying label and packaging	Labels and packaging verified.	Review of inspection reports. Observation during inspection.
	Clarify issues of concern which were identified in the pre-inspection review.	Issues of concern which were identified in the pre-inspection review are clarified.	Review of inspection reports. Observation during inspection.
	Assess corrective actions taken to address minor non-compliances for certified operators.	Previous conditions reviewed and verified.	Review of inspection reports. Observation during inspection.

	Area of Competence to be Evaluated	Evaluation Criteria	Evaluation Method
	Identify and summarize areas of potential non-compliance	Potential areas of non-compliance identified and summarized.	Review of inspection reports. Observation during inspection.
	Identify and communicate additional information to be submitted by operator.	Missing information identified and communicated.	Review of inspection reports. Observation during inspection.
	Gather samples, provide receipt, maintain chain of custody, and according to certifier procedures	Samples gathered as per certifier and contracted laboratory procedures.	Review of inspection reports. Observation during inspection.
	Conduct and document an exit interview with the operator according to certifier procedures	Exit interview conducted, covering all essential elements.	Review of inspection reports. Observation during inspection.
	Communicate the findings to the certifier according to certifier procedures.	Report filed punctually. Report well-written, clear, concise and needing no further information from inspector.	Review of inspection reports.
Knowledge	Auditing techniques protocols	Auditing protocols followed.	Review of training record, course content and result. Observation during inspection.
	Organic certification and inspection processes	Certification and inspection procedures understood and followed.	Observation during inspection.
	NOP regulations	Organic requirements understood; could clearly explain to operator.	Review of training record, course content, and result. Review of inspection reports Observed inspection.
	Organic (and conventional) production and handling processes	Understands system being inspected; using terminology specific to system being inspected; thorough assessment of Organic Control Points.	Review of training record, course content and result Observation during inspection

	Area of Competence to be Evaluated	Evaluation Criteria	Evaluation Method
	Certifier procedures	Uses certifier forms correctly. Follows certifier procedures.	Review of training record, course content and result Review of inspection reports Feedback from reviewers
	Optional: Related laws and regulations.	Asks questions and makes observations during inspection pertaining to related laws and regulations. Accurately reports findings.	Review of training record, course content and result Observation during inspection Review of inspection report
Skills	Observation	Attention to detail Relevance of questions	Observation during inspection
	Communication: Interviewing, Documenting/writing, Listening	Use of open-ended questions, paraphrasing Correct grammar, spelling Accurate, clear, concise Active listening	Observation during inspection Review of inspection reports
	Evaluation	Analyzes data, draws conclusions based on evidence, identifies and assesses OCPs	Observation during inspection Review of inspection reports
	Math	Verification of rations, DMI, recipes etc. Verification of in/out balances Logical analysis of results	Review of training record, course content and result Review of inspection reports

	Area of Competence to be Evaluated	Evaluation Criteria	Evaluation Method
	Organizational skills and time management	Plans well. Punctual. In control of agenda. Efficient.	Observation during inspection Review of time began and time ended inspection Submission of inspection report
	Information management	Well organized; prepares and uses checklists; Demonstrates appropriate computer skills.	Observation during inspection Review of inspection report
	Investigative skills	Asks good questions; Is inquisitive; Documents findings; Evidence based approach.	Observation during inspection Review of inspection report
	Sampling procedures	Samples gathered as per certifier and contracted laboratory procedures. Maintains sample integrity and chain of custody.	Review of training record, course content and result
	Skills specific to inspection scope (see examples in table 2.2.2.i)	Demonstrates competence specific to inspection scope.	Observation during inspection Review of reports Feedback from operators
Abilities	Attention to detail	Satisfactory performance: Inspectors demonstrate attention to detail during the inspection. Reviewers do not need to get further information from the inspector, inspection paperwork is clear and complete as submitted.	Observation during inspection Review of reports Feedback from reviewers

	Area of Competence to be Evaluated	Evaluation Criteria	Evaluation Method
	Able to differentiate between inspection and advice	Does not provide advice to the operation; does not assist operators to overcome barriers to certification.	Observation during inspection.
	Discernment	Demonstrates good sense of judgment; shows ability to interpret and adapt general guidelines to specific situations.	Observation during inspection. Review of reports.
	Analytical	Demonstrates logical approach.	Observations during inspection (specifically traceability tests).
	Accuracy	Absence of error.	Review of reports. Feedback from operators.
	Consistency	Methodical approach.	Review of reports. Feedback from reviewers.
	Awareness of trends and developments in conventional and organic – aspects of agriculture or food science	Appears to be up to date and knowledgeable.	Review of training records.
	Capacity for self-assessment	Open to constructive criticism. Proactive in seeking additional training opportunities.	Annual performance review; Field evaluation. Response to Feedback
Personal attributes	Integrity, confidentiality, freedom from conflict of interest, ethical behavior, open-mindedness, diplomacy, perceptiveness, versatility, tenacity, decisiveness, self-reliance, punctuality; does not provide advice for inspected operations; professional in their conduct at all times; be fit and in good mental health; economical in their use of travel	Satisfactory performance declarations kept current (confidentiality, C of I).	Feedback from operators. Observation during inspection. Review of complaints filed naming the inspector. Review of annual documentation.

	allowances; cultural sensitivity, willingness to travel		
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Professional Development Activities

A wide range of professional development activities are available for ongoing inspector training. Trainings should be documented and included in the inspector's résumé, supported by course certificates and content lists whenever possible. This is a partial list of possible professional development activities and topics:

- Residue testing
- Fraud detection and investigation
- Conferences
- Workshops
- Community college and university courses
- eOrganic webinars
- ATTRA
- On-farm demonstrations
- Subscriptions to trade magazines
- Independent study/reading
- Networking²⁴ (professional associations, list-serves, etc.)
- Peer Field Evaluation
- Performance review from certifiers: Per NOP regulation and accreditation requirements, certifiers must conduct an annual performance review of their inspection staff/contractors. At a minimum, reports, training records, feedback from operators, and complaints naming the inspector must be reviewed. Additionally, it is recommended that periodically (not every year) a qualified certifier representative accompany the inspector on an inspection and assess their performance, then meets with the inspector to give verbal and written feedback and discuss opportunities for improvement.
- Private coaching
- IOIA 200 level courses and 300 level courses (IOIA Training Institute intermediate, advanced and specialty modules)
- IOIA training modules with tests²⁵
- NOP Trainings (including The Path interactive video), webinars, Program Handbook
- Non-organic training
- Food safety (GAP, HACCP, FSMA)
- Participation in committees and working groups
- Local chapter meetings
- Preparation of training modules

²⁴ Documentation can be through verification of membership, list-serve email, etc.

²⁵ Testing and exams rated fairly highly in the 2010 IOIA certifier survey

- Updates from the certifier on paperwork, procedures, etc.
- Training in related disciplines
- Relevant training from private training providers
- Annual update to standards and national list
- Scope-specific training on changes to standards, processes, procedures



Inspector Evaluation Checklist

Inspector:	
Evaluator:	
Date of Field Evaluation:	
Organic Scope(s):	
Certifier of Operation:	
Brief Description of Operation Inspected:	
Final Score (Finding from the Rating Summary Page):	
Final Score:	
Scoring is as follows: 5: <u>Exceptional</u> : Performance outstanding. Practices are demonstrated at the highest level. 4: <u>Exceeds Expectations</u> : Performance is high. Practices demonstrate a high level. 3: <u>Competent</u> : Performance is effective. Practices are demonstrated at an acceptable level. 2: <u>Acceptable with Conditions</u> : Performance requires improvement. 1: <u>Unsatisfactory</u> : Performance is ineffective and requires extensive improvement. N/O: <u>Not Observed</u> . N/A: <u>Not Applicable</u> .	
I attest that the information provided above and on the attached pages is complete and accurate to the best of my knowledge.	
Evaluator:	[Signatures are not required; however, space is provided if you would like to enter your electronic signature].
Date of Report:	



Organization Skills and Time Management	Direct Observations	Score 5-1	Comments
	Materials		
1	Has certifier instructions and recent correspondence, if applicable. Has organic system plan (OSP), all appropriate international plans/applications, and a list of current certified products.		
2	Has current standards [i.e. National Organic Program (NOP) Standards], applicable standards and/or equivalency agreements (hard or electronic copy).		
3	Has inspection document (template or form in printout or electronic version).		
4	Has all tools necessary to complete the inspection (for example: camera, scanner, calculator, etc.)?		
	Inspection Preparation & Scheduling		
5	Is attired according to GMPs or GAPs. Employs appropriate biosecurity precautions.		
6	Reviewed file and was prepared for inspection.		
7	Arrives on time or if unable to do so, notifies client appropriately with reasonable advance notice.		
	Total (7)	0	



On-Site Tasks	Direct Observations	Score 5-1	Comments
Inspection Flow			
8	Is in control of the inspection agenda.		
9	Conducts opening meeting (1) Introduces himself/herself and other authorized participants; (2) Clearly communicates the purpose of the inspection; (3) Explains/Discusses the inspection flow process; (4) Asks the operation's representative if they have any questions. (See IOIA Opening Meeting Procedure for reference.)		
10	Conducts an exit interview with client according to applicable regulations and certifier procedures. (See IOIA Exit Interview Procedure for reference.)		
11	Summarizes next steps in certification process during the exit interview.		
Action Items Addressed			
12	Addresses and follows up on any non-resolved compliance issues identified during the pre-inspection document review.		
13	Assesses corrective actions taken to address non-compliance.		
14	Verifies that the application, OSP and supporting documentation are complete and accurate.		
15	Asks for additional information and minor OSP updates, per certifier policy.		
Document Items			
16	Verifies that the products grown, handled or manufactured are consistent with those listed or requested for certification.		
17	Verifies cleaners, sanitizers, and crop materials were used or to be used are consistent with those listed in the OSP, that they are compliant, and all annotations have been followed.		
18	Verifies pest control materials and practices are compliant and consistent with OSP, including required preventative practices, and if applicable, pest hierarchy and all annotations.		
19	Reviews all appropriate records: Processing: Product formulations vs batch records, ingredients (organic and non-agricultural), receipts, production, compliance documents and manufacturing activities, sanitation practices, labels; Crop/Livestock: Input records/receipts, seeds/receipts, parcel history (for new parcels), equipment cleaning logs, buffer harvest, feed, maps, raw manure app. time, fertility, rotation, cover cropping practices, pest control hierarchy, health inputs.		
20	Conducts an appropriate audit traceback.		
21	Conducts an appropriate verification audit (in/out balance, ingredients and/or harvest/yield).		
22	Verifies that current labels and labeling are consistent with OSP and with applicable standards.		
23	Addresses potential natural resource or biodiversity issues on the operation.		
Facility/Operation Premises			
24	Inspects all areas of premises as appropriate to the operation: Processing: receiving, ingredient, product, packaging and sanitizer storage, materials, all processes, pest control; Crop/Livestock: parcels, material and seed storage, buffers, boundaries, animals, housing, feed storage.		
25	Confirmed points of potential contamination, including identifying risks to organic integrity (organic control points).		
Total (18)		0	



Knowledge, Skills and Abilities	Direct Observations	Score 5-1	Comments
	Organic Regulations		
26	Refers to the organic regulations during inspection, when needed.		
27	Understands organic regulations, and can clearly explain to client when needed.		
	Organic and Conventional Production and Processes		
28	Understands both the organic and conventional counterpart to the operation, as applicable.		
	Certifier Procedures		
29	Demonstrates an understanding of certifier procedures, and forms.		
	Professionalism		
30	Displays a positive and professional behavior with client and represents the certifier in a positive and professional manner.		
31	Demonstrates the ability to differentiate between inspection and consulting.		
32	Responds accurately and helpfully to questions from client regarding applicable regulations and ACA certification procedures and requirements.		
	Communication		
33	Active listening skills.		
34	Open ended questions (inspector does not answer questions for producer); pertinent questions asked.		
	Sampling		
35	Is prepared to take a sample.		
36	Gathers samples per procedure, provides inspected party with a receipt and maintains chain of custody.		
	Total (11)	0	



Reporting	Direct Observations	Score 5-1	Comments
	Reporting		
37	Thoroughly completes inspection document according to established procedures.		
38	Clearly communicates all issues of concern and applicable regulations.		
39	Clearly communicates requests for additional information and/or documents sufficient for certifier to make a certification decision.		
40	Applies and communicates applicable regulations accurately.		
41	Report is complete, clear and concise.		
42	Report accurately reflects all issues noted during the inspection and listed on the Exit Interview.		
43	Report is submitted to Evaluator within certifier due date.		
	Total (7)	0	



Rating Summary	Grading Score Summary	Score	Comments
	Total Organization		
	Total On-Site Tasks		
	Total Knowledge, Skills, Abilities		
	Total Reporting		
	Total	0	
	Divided by Total Questions (43); Deduct N/A Answers.		
	Average Rating		
	Scoring is as follows: 5: Exceptional: Performance outstanding. Practices are demonstrated at the highest level. 4: Exceeds Expectations: Performance is high. Practices demonstrate a high level. 3: Competent: Performance is effective. Practices are demonstrated at an acceptable level. 2: Acceptable with Conditions: Performance requires improvement. 1: Unsatisfactory: Performance is ineffective and requires extensive improvement. N/O: Not Observed. N/A: Not Applicable.		