



Product Certification Accreditation

2016 Peer Review Executive Summary

United States Department of Agriculture Agricultural Marketing Service National Organic Program

1400 Independence Avenue, NW
Room 2646 South Building
Washington DC 20250 USA

Dates of the Peer Review:
May 16 – August 5, 2016

Prepared by

American National Standards Institute
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Document: Executive Summary

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I. GENERAL INFORMATION ON THE PEER REVIEW

Accreditation Body

Name of the Accreditation Body

**United States Department of Agriculture
Agricultural Marketing Service (AMS),
National Organic Program (NOP)**

Address

**1400 Independence Avenue SW
Room 2646-South Building
Washington DC 20250**

Peer Review

Type of Process

Remote Assessment Peer Review

Dates

May 16 – August 5, 2016

Peer Review Standard(s)

*ISO/IEC 17011:2004 Conformity Assessment – General requirements
for accreditation bodies accrediting conformity assessment bodies,
US 7 CFR Part 205, National Organic Program*

Evaluation Team

Robert (Bob) Miller PE – ANSI/ANAB Lead Assessor, ISO/IEC 17011, 17020, 17025 and 17065.

Jean Richardson Ph.D., Professor Emerita, University of Vermont, Environmental Law and Environmental Studies; Independent Organic Inspector; NOSB (2012-2017) - Chair 2014-2015 and NOSB Certification and Accreditation Subcommittee 2012- 2017.

James Riddle, Organic Independents LLP; Founding President, International Organic Inspectors Association; ISO training; Former board member, International Organic Accreditation Service; and Former chair, National Organic Standards Board.

Susan Ranck, IOIA trained organic inspector, IFT Certified Food Scientist, ANSI technical assessor.

Elizabeth Okutuga, Program Coordinator, ANSI staff, ISO/IEC 17011 process knowledge and project coordinator.

Reinaldo Balbino Figueiredo, Senior Program Director, ANSI staff, ISO/IEC 17011 evaluator. Contract/Project Manager.

Document Review Report

Prepared by

ANSI Assessment Team

Revised and Resubmitted:

September 13, 2016

II. INTRODUCTION

The National Organic Program (NOP) is part of the Agricultural Marketing Service (AMS), U.S. Department of Agriculture (USDA), and is the organization responsible for activities relating to the development, implementation, and administration in accordance with the Organic Foods Production Act of 1990 (OFPA) and the USDA organic regulations. Key functions of the NOP include:

- Developing, reviewing, implementing and interpreting the organic standards
- Enforcing organic production, handling, and labeling standards
- Accrediting, auditing, and training third-party organic certifying agents

Program and Scopes of Accreditation

The NOP established a peer review panel to satisfy internal requirements regarding adherence to internal and regulatory requirements. American National Standards Institute (ANSI) has convened this panel effective May 16, 2016 to fulfill the expectation of this requirement.

This Peer Review was conducted pursuant to 7 CFR 205.509, Peer Review Panel, of the USDA Organic Regulations. This Peer Review follows a procedure outlined in NOP 1031 (5/12/16), *Peer Review of National Organic Program* (NOP) and as modified by letter of Miles McEvoy dated 5/19/2016.

The panel was tasked with the following

- evaluate the NOP's policies processes and procedures for conformance to NOP regulations and ISO/IEC 17011,
- review implementation of certification body accreditation processes through selected file review of five files, and
- reporting the peer review panel findings in writing to the NOP Deputy Administrator and the National Organic Standards Board.

III. PURPOSE OF THE PEER REVIEW

Accreditation is the independent evaluation of conformity assessment bodies against recognized standards to ensure their impartiality and competence. Through the application of national and international standards, government, purchasers and consumers can have confidence in the certifications provided. Accreditation bodies are established in many countries with the primary purpose of ensuring that conformity assessment bodies are subject to oversight by an authoritative body.

Accreditation bodies are evaluated by peers in order to reduce trade barriers and demonstrate the competence of the accreditation body operations. Accreditation reduces risk for business and its customers by assuring that accredited Conformity Assessment Bodies (CABs) are competent to carry out the work they undertake within their scope of accreditation. The purpose of the peer

evaluation is to provide confidence in the operation of the accreditation process thus providing acceptance in the market place of the conformity assessment outcome.

IV. SUMMARY

The report covers NOP's compliance with ISO/IEC 17011 and review of NOP's accreditation procedures and decisions. The Review Panel members find that NOP and its staff are in general compliance with ISO/IEC 17011 and NOP's own policies and procedures. Opportunities for Improvement have been identified and are recorded in the individual reports and also in ANSI's Conformity Assessment portal, ANSICA. The opportunities for improvement include:

- The accreditation body's procedures lack clarity to ensure that the auditors are reviewing the regulatory status of ingredients and processing aids.
- The NOP did not follow NOP 2000 for notification to certification body of a suspension.
- Consistent accreditation records are not being used and retained in order for the NOP to be in full compliance with 205.502.
- NOP 2005-4 Witness Audit Checklist is not complete. The NOP 2000 procedure does not provide the control needed to approve the document for adequacy prior to use.
- Some NOP regulations allow NOP to be involved with CAB functions such as suspension, revocation and appeal; these regulations do not comply with ISO/IEC 17011 clause 4.3.6 A.
- The accreditation body does not ensure there is immediate notification to the NOP for potential changes by certified bodies that may affect compliance.
- The accreditation body is required to ensure a balanced representation of interested parties with no single party predominating. Balanced representation of interested parties is not described for Accreditation Committee, NOP 2012 clause 2 qualifications.
- ISO/IEC 17011, Clause 5.3 requires all documents to be controlled. Not all documents are adequately controlled.
- NOP indicates it has procedures for identification, collection, indexing, accessing, filing, storage, maintenance and disposal of its records, but specific procedures are not identified.
- ISO/IEC Guide 65 has been superseded by ISO/IEC 17065; however, some documents and procedures still refer to Guide 65.