

National Organic Standards Board
Certification, Accreditation and Compliance Subcommittee
Proposal: NOP Risk Mitigation Table Review
February 8, 2022

Background:

On November 18, 2021, the National Organic Program (NOP) sent a [memo to the National Organic Standards Board \(NOSB\)](#) requesting that it review and facilitate public comment on the NOP Risk Mitigation Table. This table was developed in response to the 2020 Peer Review conducted by the American National Standards Institute (ANSI) National Accreditation Board and seeks to document the ways NOP safeguards impartiality in the delivery of services and oversight over accredited certifiers. International Standard ISO/IEC 17011; *Requirements for accreditation bodies accrediting conformity assessment bodies*, which is the standard NOP adheres to in carrying out its accreditation procedures, along with those required by the organic regulations themselves, was revised in 2017. The new ISO standard now recommends that an organization's risk mitigation controls be reviewed by a representative body. The NOSB is serving as this "representative body" given the board's prior interest in the NOP's Peer Review process.

Summary of Review:

The Certification, Accreditation and Compliance Subcommittee (CACS) reviewed the NOP Risk Mitigation Table and has determined that all potential conflicts were included and are clear. The CACS did not identify any additional potential conflicts to be included.

In addition to CACS's review and the full NOSB's review and consideration, the Board and program are seeking feedback from stakeholders to identify or clarify any potential conflicts of interest and mitigation strategies not covered in the table, so that these may be incorporated, as applicable.

Subcommittee Proposal:

CACS recommends that NOP incorporate the Risk Mitigation Table into their procedures.

Questions to Stakeholders:

1. What potential conflicts of interest and mitigation strategies are missing from the table?
2. Could any potential conflicts of interest and mitigation strategies identified in the table need further clarification?

Subcommittee Vote:

Motion to accept the proposal on the NOP's Risk Mitigation Table

Motion by: Kyla Smith

Second: Nate Powell-Palm

Yes: 5 No: 0 Absent: 0 Abstain: 0 Recuse: 0