



Preparing for a Handling Inspection

Handlers often describe their organic inspection as quite stressful, but it doesn't have to be. You will be more prepared and relaxed at your inspection if you know what to expect and have done some practice, so that when the inspector asks for specific documents you know right where to find them. This article walks through the specific tasks and key documents you'll want to have in hand before your inspection, so you go in organized, confident, and ready.



What You'll Learn

- Specific tasks involved in reviewing and updating the Organic System Plan (OSP)
- Documents that must be gathered, organized, and verified, including supplier certificates, NOP Import Certificates, and Safety Data Sheets (SDS)
- The usefulness of internal mock tracebacks and mass-balance audits to prepare the facility team for an inspection
- Preparations required for inspection day, including personnel availability and calculating adjusted gross sales

When it comes to organic inspection, waiting until the last minute is not a strategy. Handlers find far more success when they prepare for the annual inspection throughout the year, rather than scrambling right before the inspector arrives. You can organize that preparation around a handful of distinct tasks that will likely come up at the inspection. Along the way, most handlers find that preparing surfaces valuable opportunities for improvement, and makes for a far more relaxed inspection day.

CULTIVATE AN “ALWAYS READY” CULTURE

The most effective way to prepare for an inspection is to avoid treating it as a once a year event. A year-round culture of organic compliance prevents the frantic scrambling that happens right before the inspector arrives, and it leaves staff feeling confident and empowered in their part of the chain of organic integrity. Certifiers are also required to conduct unannounced inspections on a minimum of 5 percent of their certified operations each year,¹ so it pays to be ready to demonstrate compliance at any time.

Your Organic System Plan (OSP) must stay accurate and current. The inspector's primary job is to verify that your real world practices match this written plan.² That means your OSP needs to be a living document, updated continuously so that it reflects what you're actually doing on the day the inspector arrives. Ensure that any change affecting organic certification gets approved by your certifier before it's implemented, not after.³ Build organic recordkeeping into your facility's daily and weekly routines.⁴ When records and logs are part of how your team already works, they get completed consistently and paint a full, accurate picture, which makes your inspection flow much easier.

“Without fail, every single certifier inspector we've had has said, 'thank you for being so organized.' I don't think of myself as organized, organic certification helps me to be organized.”

Jessica Jones
Brewer/Co-Owner
Giant Jones Brewing

ORGANIZE YOUR RECORDS

Inspectors have a limited amount of time at your facility, and poor record organization is one of the most common sources of difficulty at inspections. Records that are well organized, and that your audit team are familiar with, make life easier for both you and the inspector.

Prepare Your Recordkeeping System⁴

Whether you use paper binders, a digital ERP system, or a shared Google Drive, the format needs to be logically organized and easy to access. This is where a strong company culture pays off: when every staff member completes records accurately and consistently, and those records stay accessible, organization takes care of itself. Learn more in the article [Designing a Recordkeeping System for Your Operation](#).

Gather and Verify Supplier Documentation

At inspection, you'll need the supplier verification documentation for all your suppliers easily on hand.⁵ Best practice is to gather them throughout the year, for suppliers, co-packers, and private label brand owners alike, and keep them in a single place. Each certificate needs to have been current at the time you acquired it. You must also independently verify each supplier's certification status using the USDA's Organic Integrity Database (OID).⁶ Many handlers set aside time each year to check in with key suppliers, both to refresh certificates and to confirm consistency of supply. If you source from exempt, uncertified brokers, you'll need documentation linking the shipment directly back to the last certified operation, confirming the product was received in sealed, tamper-evident retail packaging.⁷ Learn more in the article [Building and Maintaining a Supplier Approval Program](#).

Gather Import Documents

If you import ingredients, have your supporting documents ready for inspection: NOP Import Certificates (NOPIC), customs entry documents, and any phytosanitary certificates.⁸ If your NOP Import Certificates are time-based and cover multiple shipments, be ready to show that the combined volume of those shipments didn't exceed the total volume listed on the NOPIC. Learn more in the article [Maintaining Organic Integrity for Imported Products](#).

Collect Safety Data Sheets, Materials, and Ingredient Information

The materials list in your OSP needs to be current when the inspector arrives. Beyond the list itself, you'll also want to have supporting documentation available that the inspector can reference for more detail: Safety Data Sheets (SDS), product profiles, and ingredient labels for every pest control product, boiler chemical, cleanser, and sanitizer you use.⁵ Learn more in the articles [Verifying Compliant Ingredients and Processing Aids](#) and [Allowed Materials for Cleaning and Sanitizing](#).



CONDUCT INTERNAL AUDITS

Don't let the inspector be the first person to test your recordkeeping system. Learn how the traceback and mass-balance audits work,⁹ and practice them with your team ahead of time. These mock audits will help you find and fix any gaps before the real inspection.

Practice the Traceback Audit

A traceback audit uses your records to trace one of your finished products, starting at its point of sale, all the way back to when it arrived at your facility as raw ingredients. Practicing this yourself means you'll already know the drill when the inspector asks for it. Pick a random finished product and trace it backward through the documents at each step, all the way to the receiving records for its ingredients, making sure lot numbers clearly connect every step along the way. If your operation doesn't process product, your records should link directly from sales or shipping back to the last certified operation. Learn more in the article [The Traceback Audit](#).

Practice the Mass-Balance (In-Out) Audit

The mass-balance audit is another way inspectors test the veracity of your organic records: in general, what leaves your facility should balance against what came in. To practice one yourself, pick a finished product and a timeframe, three months is a reasonable starting point, then confirm that starting inventory plus purchases equals sales plus shrink or loss plus ending inventory. Learn more in the article [The Mass-Balance Audit](#).

"You basically have to create a paper trail showing that from an outbound sale of a finished good, I can connect through every single document in the production process all the way back to your inbound shipping. Practice on a teammate first."

Nate Powell-Palm

Founder

Powell Palm Ag Services LLC

MAKE UPDATES AHEAD OF TIME

Below are some crucial sections of your OSP that you should keep up to date, so that it is accurate on the day of your inspection:

Update Facility and Process Changes

A new machine with a different clean-out procedure, a relocated mouse trap, a change in where ingredients are stored, all of these need to be reflected in your OSP as they happen in real time. Make it a habit to ask, whenever something changes, whether the OSP needs to change with it. And remember that any significant change must be approved by your certifier before it takes effect.²

Review Label Changes with Your Certifier

"Organic" is a legal label claim, which makes your labels a crucial part of your OSP.¹⁰ All current and proposed labels, retail and nonretail, including shipping and storage labels, should be included in your OSP. Using a new label before your certifier approves it can result in noncompliance and costly reprinting. Learn more in the article [Labeling Requirements for Products Intended for Human Use](#).

Update Your Materials List

Your inspector will review your materials list, so it needs to be complete and accurate. Discuss any proposed changes with your certifier first, and update the list once a new material is approved.⁵ Using an input material before it's approved can result in noncompliance and put the organic status of your products at risk. This applies to everything from equipment cleaners and sanitizers to wash water additives and pest management chemicals. Learn more in the article [Recordkeeping for Pest Control and Sanitation](#).

Update Product Profiles and Supplier Lists

Anytime you switch suppliers, alter an ingredient, or tweak/introduce a product recipe, your OSP must be updated and your certifier must approve before implementation. Make sure that you have properly documented the changes that your certifier approves so that the inspector can verify that your information is correct and up to date. Learn more in the article [Putting It All Together with the Organic System Plan \(OSP\)](#).

ADDRESS CERTIFIER COMMUNICATIONS

Review the Initial Review Letter

After reviewing the OSP and paperwork, some certifiers send a letter ahead of the inspection, often called an Initial Review Letter. It may include questions or requests for further information. Respond by the noted due date, and have your answers and any supporting documents ready to discuss with the inspector.

Address Past Noncompliances

Review any previous letters of noncompliance and other conditions your certifier has imposed. Be ready to provide documents demonstrating that past issues have been fully corrected. Learn more in the article [Noncompliances and Adverse Actions](#).



MANAGING INSPECTION DAY LOGISTICS

Effective preparation goes beyond paperwork. Your team also needs to know their roles going into inspection day.

Calculate Financials

Have the total dollar amount of your adjusted gross sales, gross sales minus the cost of organic goods, ready for certified products. Certifiers commonly use this figure to calculate your annual fees.

Ensure Personnel Availability

The inspector will ask specific questions about how products are handled on the floor and how records are maintained, which means they'll need to speak with various staff members during the inspection. Anyone integral to the OSP, recordkeeping, or ongoing organic compliance should be scheduled and available, that typically means plant managers, line supervisors, and QA staff. Make sure these staff also understand and are well-trained on their specific roles in the chain of organic integrity.

Facility Walkthrough

Review your OSP and flag the areas you think are higher risk; these are the areas your inspector will most likely want to visit. Then walk your facility yourself, checking the same areas and staff the inspector will likely want to see: physical barriers between organic and conventional goods, pest control practices that match your facility map, and organic storage areas that are clearly labeled and segregated. Make sure biosecurity protocols are also clearly communicated to the inspector before they arrive.

Inspection Prep Checklist

Work with your compliance team to put the following in place ahead of your next inspection.

- ☐ Train the team in an “always ready” culture
- ☐ Gather:
 - ☐ Supplier verification documents (organic certificates and addenda)
 - ☐ Import certificates
 - ☐ Materials information (safety data sheets)
 - ☐ Product profiles
- ☐ Practice:
 - ☐ Traceback audit
 - ☐ Mass-balance audit
- ☐ Update:
 - ☐ Facility changes
 - ☐ Process changes
 - ☐ Product labels
 - ☐ Materials list
 - ☐ Product profiles
 - ☐ Suppliers list
- ☐ Address Certifier Communications:
 - ☐ Initial review letter
 - ☐ Past noncompliances
- ☐ Inspection Day Logistics:
 - ☐ Ensure personnel availability
 - ☐ Plan the facility walk through
 - ☐ Calculate financials

CONCLUSION

Preparing for an inspection is really just good organic housekeeping. Keep your OSP current, stay on top of your records, practice your audits before the inspector does, and make sure your team is ready to walk anyone through your operation on any given day. Do those things consistently, and inspection day stops feeling like a deadline and starts feeling like a routine check-in, one where you already know how it's going to go.



ACTION ITEMS

- Set a recurring date to review and update your OSP.
- Practice a traceback audit on a random finished product.
- Run a mass-balance and check that your numbers add up.
- Gather all supplier certificates into one place and verify them in the OLD.
- Walk your facility the way your inspector will.
- Make sure your materials list reflects everything you're currently using.
- Confirm that key staff are available and know their roles on inspection day.

SOURCES CITED

1. USDA National Organic Program, 7 CFR §205.403(b)(1).
2. USDA National Organic Program, 7 CFR §205.403(d)(2).
3. USDA National Organic Program, 7 CFR §205.400(f)(2).
4. USDA National Organic Program, 7 CFR §205.103.
5. USDA National Organic Program, 7 CFR §205.201(a).
6. USDA National Organic Program, 7 CFR §205.404.
7. USDA National Organic Program, 7 CFR §205.101.
8. USDA National Organic Program, 7 CFR §205.273.
9. USDA National Organic Program, 7 CFR §205.403(d).
10. USDA National Organic Program, 7 CFR §205.300.



United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

