

Inspections Transcript

Nate Powell-Palm (00:37):

Our biggest red line is just making sure that we don't send nonorganic products into the marketplace. And so, as we think about the role of the organic inspector, they're there to identify discrepancies between what you said you were doing on paper and what they actually see you doing in person.

Johanna Phillips (00:53):

The person who's inspecting you is not the person who's making the decision about your certification activity. They're just observing your activities, and they're going to send that information back to somebody who is making the decision. They may, in some cases, be a contractor or someone who's, who is working across multiple certification agencies.

Amanda James-Martin (01:15):

An organic inspection really is just verifying the systems that you already have in place. So if you're familiar with the systems and they are your system, so you should be, then it's really just kind of reviewing through that and explaining that to somebody.

Jessica Jones (01:29):

Unless you're trying to get away with something, you're not going to get caught, because you're participating in a regulated system. Inspection is really just a chance to check in and strengthen your organic systems.

Lynne Haynor (01:44):

The inspector and having new eyes on your operation can point out things that are potentially weak points in your system, and I think taking these seriously as opportunities to improve your business is a good way to approach that part of the process.

Aileen Mannion (02:05):

When you work with an organic certifying agency, they usually give you ample time to prepare. So the first thing is you get a letter from them, "Hey, an inspector's been scheduled. This is your tentative date."

Joey Smyser (02:17):

Don't panic. Take your time, get your system in place, and then start working through your process.

Michael Gutschenritter (02:25):

Ask for a list of exactly the documents that you need for inspection, so you can be collecting them before the inspection and not the day of.



Amanda James-Martin (02:36):

Organizing records is a really important part of getting ready for inspections, because there are so many. And then I personally like to have like a cheat sheet of where most of those are. So I usually have like an Excel document that's color coded with all the different categories and where everything is. It helps me.

Nate Powell-Palm (02:55):

You're going to be tasked with explaining how all of those documents line up. So practice on an employee or practice on a teammate first and let them say, "I don't really see how those two documents connect. It seems like a leap that they connect." And use that before your inspector arrives as just a little bit of a pre-audit.

Amanda James-Martin (03:15):

And then another thing I really like to do is practice the mass-balance and then also the traceback activities because I feel like those can actually be the most challenging part of an inspection if you aren't prepared for them or don't do them very often. Because if you only do something once a year, it's going to be rusty every single time you do it. But if you are doing something like that, even like quarterly, that is really, really helpful.

Nate Powell-Palm (03:40):

And I would make sure that you have the folks who are actually in charge of the different parts of the production process available for interview. Finding the plant manager, finding the floor manager, finding the line manager who's really tasked with the organic production, making sure they're all available to directly answer the questions will make it so much easier to get through the certification process if you're not trying to have one team member interpret everyone else's jobs for the organic inspector.

Aileen Mannion (04:12):

So when everyone is trained what they need to do and you're doing it on a daily basis, there's really nothing to prepare.

Michael Gutschenritter (04:25):

Your experience is going to have everything to do with two things, how organized you are and who your inspector is.

Chad Olson (04:36):

When they come in the door, you know, they identify themselves as an inspector. They say what they're here to do.



Amanda James-Martin (04:43):

And they usually do kind of walk you through what the day will look like, which is really nice, especially if you're new to getting inspected.

Jill Brockman-Cummings (04:49):

It depends on the inspector, but generally they want to do a walkthrough first and have me just show them around, and as I show them around, I might point out block codes or I might point out like where we store the grain or where we store our finished product. I think they're also just trying to get an overview of our business if they've never been here before and understanding what we're doing.

Amanda James-Martin (05:12):

The walkthrough is my favorite part, mostly because you get to really show off what you're doing every day. It's nice to be able to be like, "Yeah, look, look at our labeling over here. Look at our storage conditions over here."

Nate Powell-Palm (05:22):

If we're going to then move into paperwork, paperwork is going to consist of two required audits. We have a mass-balance and a traceback. Again, this is describing the storytelling of the operation. We need to be able to show that we can trace all of the ingredients for a given product back, and show where it came from, and show that it was organic.

Chad Olson (05:47):

When it comes to the tracebacks, they generally will go in and they'll pull an order, an actual order we've done. So a lot of times they'll just grab an invoice off the pile and say, "Let's start with this one. It's got this coffee on it. Let's go."

Jill Brockman-Cummings (05:59):

Sometimes they ask for you to go get like a retail size package of dark rye was the last one. And I bring it back to them and then they look at the lot and then they say, "Okay, now what I want you to do is find when you brought that rye into the mill. Where did it come from? Who was. Show me the organics certificate." So they'll actually take a physical product and then you have to show them everything along the line.

Nate Powell-Palm (06:24):

We then need to be able to justify that the production of a given quantity of finished goods is justified by the amount of ingredients that we have purchased into the plant. Once those two audits are executed, then we're going to go through a fairly robust checklist of questions regarding all of your operation, anything that comes in contact with the food, everything from shipping and receiving, to your pest control, to how you manage sanitizers, to your storage and segregation of organic and conventional goods.



Amanda James-Martin (06:56):

And when they are getting ready to close out that inspection, then they will do a closing interview and they'll let you know anything that they observed.

Nate Powell-Palm (07:06):

They're going to say, "I saw that possibly," for example, "a sanitizer was used that doesn't appear to be in compliance. You don't have organic paperwork for certain ingredients." Those sort of findings. They would share them with you. They would share how they are inconsistent with the National Organic Program standards, and then you would both sign off that those are indeed accurate findings. There wasn't a confusion, a misunderstanding on the behalf of the inspector.

Amanda James-Martin (07:33):

And from that point, that information gets submitted to the certifier who ultimately has the final decision about any of those observations.

Griffin Berger (07:40):

Pulling a random BIN number out and then tracing it through and seeing... Now getting inspected, it feels just like another day of the week. You know, you break out the records, you say hi, drive them around the fields, you know, look at some logs. It's just another day on the farm. It's not a stress-induced activity anymore, so I'm fine getting audited any day of the week now.

Zach Dowd (08:07):

Honestly, I was terrified. It's like someone's coming into my place and grading my work and telling me I'm doing this right, and I just thought, "Oh no, they're going to see all of these things that are wrong."

Jill Brockman-Cummings (08:20):

Yes. The first certification was very, very scary. I had no idea what to expect.

Michelle Pusateri (08:24):

I think I cried through my entire first audit.

Joey Smyser (08:28):

Yeah, so you're going to be stressed and anxious about the first inspection, but you shouldn't be because the inspectors are going to be coming in and they're not looking to get you. They're looking to help you improve.

Zach Dowd (08:39):

The organic certification for a handler is just data, pretty much. Have the SOPs in place and collect the data that you need, and as long as you have that, it's relatively easy.



Michelle Pusateri (08:52):

The person who was auditing us was incredible and really helpful, and we learned so much from them. I think that was the biggest thing, is going into the audit with, "Hey, we're here to learn. We want to do the best that we can," instead of getting defensive at all.

Jill Brockman-Cummings (09:06):

It's not that scary. That's what I would tell my former self, "Just relax." Like, these people are trying to actually help you, not try to do a gotcha moment. If you're doing something that's not quite right, they will help you and they will guide you and tell you what they expect, and you better, you know, figure it out and give it to them within a certain amount of time, but it's not a scary process.

Abel Sanchez-Valencia (09:30):

And once you do have one, once you have two, once you have three audits under your belt, they become easy. You look forward to them, and even though you have different auditors you build confidence with time that make it easier to go through that audit.

Johanna Phillips (09:49):

I would say the greatest disservice that a certifier can perform to an operation is to make their initial inspection too easy, because their second inspection is always the hardest, because at the first inspection, you're verifying the concept of compliance. At the second inspection, you're verifying actual compliance.

Michael Gutschenritter (10:09):

Our first inspection was so easy. It was crazy. I thought, "Wow, this is it. <laugh> This is great." The second inspector, he did not understand why I didn't have all my ducks in a row. We sat there and basically every question that he asked me, I didn't have a good answer to. It was really embarrassing and very uncomfortable. So he was gracious enough to guide me and say, "Look, this, these are the things that you need." So I took a lot of notes. I was not. I just wasn't prepared.

Nate Powell-Palm (10:50):

Once your inspector arrives, they're probably going to find problems. Take that as advice. Take that into consideration. Those problems are probably something you can fix. The inspector in no way will be able to tell you how to fix them. It is your system and is completely on you to fix it, but the issue of concern, identifying gaps in your traceability in your paper chain are going to be, I think, really helpful to fixing and improving your system.

Amanda James-Martin (11:17):

If there is a finding, that's just something that can make you better. That's just an opportunity to improve the systems you have in place, and it took the inspector's eyes to find that sometimes, but it will ultimately make your Organic System Plan stronger or your food safety plan stronger.



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