

Inspection Review Announced and Unannounced



Regenerative Organic Certification (ROC) is a Rodale sponsored certification that will act as an “add-on” label to the USDA National Organic Program. The following is a brief overview of the project. MOFGA continues to monitor its development and will gauge support as the process moves forward.

From their website: (<https://regenorganic.org>):

“Regenerative Organic Certification includes guidelines for farming and ranching operations, transportation, slaughter, and certain processing facilities that produce food and fiber. Using the United States Department of Agriculture’s National Organic Program (USDA Organic) certified organic standard (or its international equivalency) as a baseline requirement, Regenerative Organic Certification adds criteria and builds off these and other standards in the areas of soil health and land management, animal welfare, and farmer and worker fairness. The goal of Regenerative Organic Certification is to promote holistic agriculture practices in an all- encompassing certification that:

- Increases soil organic matter over time and sequesters carbon below and above ground, which could be a tool to mitigate climate change;
- Improves animal welfare;
- Provides economic stability and fairness for farmers, ranchers, and workers.

The Regenerative Organic Certification program is overseen by the Regenerative Organic Alliance, a non-profit established to continuously review and update the certification’s guidelines. The Regenerative Organic Alliance is made up of experts in farming, ranching, soil health, animal welfare, and farmer & worker fairness, and will regularly reevaluate certification guidelines and update the certification, as necessary.

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The National Organic rule states that all applicants or certified operations must have on-site inspections annually as part of the application or renewal process. Per the regulation below, MCS is required to physically inspect each “production unit” at a point in the year where compliance can best be verified.

\$205.403 On-site inspections. (a) *On-site inspections.* (1) A certifying agent must conduct an initial on-site inspection of each production unit, facility, and site that produces or handles organic products and that is included in an operation for which certification is requested. An on-site inspection shall be conducted annually thereafter for each certified operation that produces or handles organic products for the purpose of determining whether to approve the request for certification or whether the certification of the operation should continue. (2)(i) A certifying agent may conduct additional on-site inspections of applicants for certification and certified operations to determine compliance with the Act and the regulations in this part.

MCS is required to perform roughly 30 unannounced inspections each year to comply with NOP guidance. Chosen operations are based on the NOP matrix of random, risk-based, complaint or investigation, and the reason is disclosed to each chosen operation.

inspections, and acting as a deterrent to other operations who may consider violating USDA regulations. In light of these benefits, certifying agents are strongly encouraged to conduct unannounced inspections.”

The guidance goes on to say “we recommend that certifying agents conduct unannounced inspections of 5 percent of their total certified operations per year as a tool in ensuring compliance with the regulations. Operations chosen for unannounced inspections may be random, risk based, or the result of a complaint or investigation. The certifying agent should disclose to the operation the reason that the operation was chosen for the unannounced inspection.

For MCS, this means that we are required to perform roughly thirty (30) unannounced inspections each year to comply with this guidance. We utilize the same decision making matrix as described above (random, risk-based, complaint or investigation) to fulfill this requirement. If you are an operation that has experienced an unannounced inspection, please know that you are not being “singled out” or “picked on”, but rather part of our requirement of the USDA in that given year. The unannounced inspection requirement or option helps to ensure consumer confidence in the certified organic seal. USDA organic is heavily reliant on trust of the operation, both from the certifier as well as the consumer. To that end, the option of unannounced inspections is a way of keeping everyone “honest” in complying with the regulations.



Unannounced Inspections

In September 2012, the NOP released guidance document NOP 2609, per recommendation from the National Organic Standards Board (NOSB), to inform certifiers and promote consistent application of the standards. It states: “unannounced inspections are one of the most effective and useful tools in the USDA organic regulations to ensure compliance across certified operations, and give consumers additional reasons to trust the organic label. Unannounced inspections serve the dual purpose of giving the certifying agent the opportunity to observe the activities of a specific operation without the advance notice, as provided in the annual monitoring

