



## National Organic Program Witness Audit Checklist

<b>Witness Audit - General Information</b>	
<p>This checklist is used in conjunction with Tables 1, 2, 3, 6a, 6b, 6c, and 7b of NOP 2005 Accreditation Assessment Checklist. This checklist is used to record evaluation information for each witness audit with the exception of grower groups. NOP 2005-5 Witness Audit Checklist for Grower Groups shall be used for witness audits of grower groups.</p>	
Name of auditor(s):	
Inspection date; initial or annual?	
Name of operation:	
Location of operation:	
Scope(s) of certification requested:	
Inspector's name:	
Inspector conflict of interest or confidentiality concerns:	
Operation representative (knowledgeable):	
Other inspection attendees:	
Time inspection started:	Time inspection completed:
<p>General information: <b>Crops</b> grown, acreage, fields and field location(s) (1 site or 2 or more); <b>Wild Crops</b>: products collected, harvest site locations, collector training; <b>Livestock</b> operation type, number of animals, identification methods, products; <b>Handling</b> operation, products processed, facilities, etc...</p>	



General information on materials and inputs used and are they in compliance with the National List (NL) and annotations.

<b>Did the inspector and the on-site inspection verify that the organic system plan (OSP) complies with the USDA organic regulations for: (§ 205.403(c))</b>	
<b>General</b>	
Maintain or improve natural resources (§ 205.200)	
<b>Crops</b>	<b>Section N/A _____</b>
Land requirements (§ 205.202)	
Soil fertility and crop nutrient management practice standard (§ 205.203)	
Seeds and planting stock practice standard (§ 205.204)	
Crop rotation practice standard (§ 205.205)	
Crop pest, weed, and disease management practice standard (§ 205.206)	
Approved temporary variance practices? (§ 205.290)	
<b>Wild Crops</b>	<b>Section N/A _____</b>
Wild-crop harvesting practice standard (§ 205.207)	
<b>Livestock</b>	<b>Section N/A _____</b>
Origin of livestock (§ 205.236)	
Livestock feed (§ 205.237)	
Livestock health care practice standard (§ 205.238)	



Livestock living conditions (§ 205.239)	
Pasture practice standard (§ 205.240)	
Approved temporary variance practices? (§ 205.290)	
<b>Handler</b>	<b>Section N/A _____</b>
Organic handling requirements (§ 205.270)	
Facility pest management practice standard (§ 205.271)	
Commingling and contact with prohibited substance prevention practice standard (§ 205.272)	
Did the inspector verify product composition for all products? (§ 205.301)	
Approved temporary variance practices? (§ 205.290)	

<b>Labels (§ 205.403(c))</b>	<b>Section N/A _____</b>
Were labels verified during the on-site inspection? (§ 205.403(c)(2))	
Were the labels being used the same as those approved by the certifier?	
How was the inspector made aware of which labels were approved by the certifier?	
<b>Sampling</b>	<b>Section N/A _____</b>
Did the operation provide access to all products?	
Was a sample collected during the inspection? (§ 205.670) (pre- or post-harvest?) (periodic residue testing?)	
Why was sample pulled? (Directed by the certifier or NOP, or inspector decision?)	
For what was sample to be tested?	
Verify sampling procedures, chain of control, etc. (§ 205.670(e))	
Did the inspector provide the applicant with a receipt for any samples taken? (§ 205.403(e)(1))	
Did the sampling process follow the certifier's sampling procedure?	
Was the inspector charged for the samples? (§ 205.403(e))	
Did the certifier pay for the testing? (§ 205.670(b), (c))	

<b>Exit Interview (§ 205.403(d))</b>	
Document information addressed or requested by the inspector during the exit interview:	
Was the exit interview conducted with a knowledgeable representative?	



Did the exit interview address the accuracy and completeness of the inspection observations?	
Did the exit interview address the need for additional information?	
Did the exit interview address issues of concern identified during the inspection?	

<b>Questions for the inspector:</b> As the inspection progresses insert additional questions to ask the inspector on areas of the inspection/operation that need clarification.	
What did the inspector receive from the certifier in order to conduct the inspection?	
Does the inspector have a copy of the USDA organic regulations?	
If applicable, was the inspector knowledgeable of recent updates to the regulations or policy clarifications?	
How is the inspector informed of the certifier's policies and procedures and changes to them?	
What is the inspector's background (experience, training, and education) in relation to the operation being inspected?	

<b>Questions for the Applicant/Certified Operation:</b> As the inspection progresses insert additional questions to ask the operation's representative on areas of the operation that need clarification.	
Did the certified operation receive a copy of the previous inspection report, if applicable?	
Did the operation receive a certificate from the certifier?	
Does the client have a current copy of the USDA organic regulations?	
If applicable, how did the operation receive information on temporary variances?	

<b>Overall did the inspection verify:</b>	
That the operation was in compliance or was able to comply with the Organic Foods Production Act and the regulations? (§ 205.403(c)(1))	
That the OSP accurately reflected the practices used by the operation? (§ 205.403(c)(2))	
That prohibited substances had not been and were not being applied to the operation? (§ 205.403(c)(3))	
Does the inspector provide consulting services of any kind? (§ 205.501(a)(11)(iv))	



If so, how is this information provided to the certifier?	
Was there enough time allocated for the inspection?	
Did the inspector verify the corrective actions on previous noncompliances?	
Was the inspection scheduled when land, facilities, and production practices demonstrate compliance with NOP requirements?	
Did the inspector collect new or revised OSP information?	
Days or months between submission of application (annual update) and date of inspection? If length of time is unreasonable, why?	

<b>International Agreements</b>	
Does the operation participate in any international agreements, such as: <ul style="list-style-type: none"> <li>• EU equivalency</li> <li>• Canada equivalency</li> <li>• Japan or Taiwan export arrangement</li> </ul>	
If yes <b>for equivalency arrangements and the operation is shipping out</b> , did the inspector verify specific program requirements, including: <ul style="list-style-type: none"> <li>• Critical variances</li> <li>• Labeling requirements of the destination country</li> <li>• Documentation requirements, including compliance of incoming ingredients, as applicable</li> </ul>	
If yes <b>for equivalency arrangements and the operation has received EU or Canada product in</b> , did the inspector verify incoming product was accompanied by: <ul style="list-style-type: none"> <li>• NOP Import Certificate (EU)</li> <li>• Attestation statement (Canada)?</li> </ul>	
If yes <b>for Japan export arrangement</b> , did the inspector verify program requirements, including material use?	
Was the inspector aware of international agreement requirements?	
How is the inspector informed of the international agreements? What information or training is provided by the certifier?	



Does the OSP indicate participation in international agreements (i.e., would the inspector know of international agreement participation before arriving onsite)?	
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**Witness Audit – Auditor findings and citations**

**Finding 1**

**Finding 2**

**Finding 3**

**Finding 4**

**Witness Audit – Auditor follow up requests or activities**