



FOCUSED UNANNOUNCED INSPECTIONS

Guidance

Inspectors that have accepted unannounced inspection assignment(s) from PCO are expected to conduct the unannounced inspection as outlined in the *Inspection Authorization Memo – Inspector* issued by PCO with the assignment. This document (*Inspection Authorization Memo – Inspector*) may outline a requested focus for the unannounced inspection; in cases where a focus is not dictated by PCO, the inspection focus is at the discretion of the inspector.

This document provides an overview of potential high-risk areas that inspectors may consider when using their discretion to determine the focus for partial unannounced inspections. Other considerations for the focus of the inspection should be made by the inspector based on the client’s OSP and certification history as provided by PCO. If the inspector observes a potential non-compliance upon arrival on-site, the inspection should focus on that area of concern.

NOP REGULATIONS AND PCO POLICY

MATERIALS

As required by §205.201(a)(2) - Organic production and handling system plan, “*An organic production or handling system plan must include: (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable.*”

PCO requires that the operator maintain a PCO Materials Used Form (MUF) (or comparable equivalent) that meets the requirements of the standards. Materials are to be used in compliance with the standards.

At inspection, verify that all materials in use on the operation are listed on the operator’s MUF, and that they are being used as reported by the operator. Verify that the operator’s records document use of these materials as is applicable (livestock healthcare records, spray records, cleaning logs, etc.).

CONTAMINATION

As required by §205.272 Commingling and contact with prohibited substance prevention practice and §205.202(c) Land requirements, the operator is responsible for maintaining practices that prevent the application of prohibited materials (including unintended application) or the commingling or contamination of an organic product.

PCO requires that the operator define these practices particular to their operation in their OSP. These include, but are not limited to, field buffers, cleanout and/or purge procedures, and SOPs for split operations.

At inspection, verify potential contamination/commingling risk factors on the operation and verify that the practices reported in the operator’s OSP correspond with the practices observed on the operation.

LIVESTOCK HOUSING/ OUTDOOR ACCESS

As required by §205.239 Livestock living conditions, the operator is required for providing living conditions in compliance with the standards, including, “*year-round access for animals to the outdoors, shade, shelter, exercise*

areas, fresh air, clean water for drinking, and direct sunlight, suitable to the species, its stage of life, the climate, and the environment: Except...”

At inspection, verify that the operator’s practices and housing are compliant with the standards. If the operator is temporarily denying any animal groups access to the outdoors, verify that this period of confinement is documented and that the reason provided for confinement is compliant with the standards.

FEED RATIONS/ PASTURE

As required by §205.237 Livestock feed, ruminant livestock operators are required to maintain sufficient practices for ensuring that animals are obtaining 30% of their dry matter intake from pasture during the grazing season; operators are also required to maintain sufficient records for verification of feed rations as fed for each class of animal.

PCO requires that ruminant operators report their feed rations in their OSP and maintain records of their feed ration changes including grazing season start and end dates.

At inspection, verify that the operator’s practices and records are compliant with the standards. Verify that the operator’s feed records include supplemental feed during the grazing season. Verify that pasture quality and management is compliant with the standards.

PRODUCT PROFILE VERIFICATION

As required by §205.103 Recordkeeping by certified operations and §205.301 Product composition, processors are required to maintain records that disclose activities, including product composition of certified processed products.

PCO requires that processing clients submit these records for each multi-ingredient processed product on a Product Profile form.

At inspection, verify that the operator’s production practices match the formulation and other details reported on their product profile. Verify that the product(s)/ingredient(s) are being received from suppliers as reported on the OSP and that sufficient documentation is available to ensure organic integrity of product(s)/ingredient(s). For livestock feed operators, verify production records (ingredients sheets) against labels to ensure consistency. The inspector should verify a sufficient number of labels to confirm that the operation’s production records match the operation’s labels; there is no minimum requirement for review.

ADDITIONAL INFORMATION

OTHER CONSIDERATIONS

If the client is not present at the time of your attempted unannounced inspection, follow the directions on the *Inspection Authorization Memo – Inspector*. For unannounced inspections with a focus at the discretion of the inspector, if you are unable to reach an authorized representative but are able to observe from a public road or other non-private location a compliance verification such as contamination or livestock housing, complete your inspection report detailing these observations and the location from which you made your observations.

