



INTERNATIONAL FEDERATION OF ORGANIC AGRICULTURE MOVEMENTS

IFOAM Head Office • Charles-de-Gaulle-Str. 5 • D - 53113 Bonn

**IFOAM Head Office**  
Charles-de-Gaulle-Str. 5  
53113 Bonn  
Germany

Phone: +49 - 228 - 92650 - 10  
Fax: +49 - 228 - 92650 - 99

headoffice@ifoam.org  
www.ifoam.org

2008-05-20

IFOAM thanks the Certification, Accreditation, and Compliance Committee (CACC) for the Appendix to the discussion document on certifying operations with multiple production units, sites and facilities and for inviting discussion and comments from the organic community. IFOAM appreciates the careful and thoughtful consideration that the CACC and the National Organic Standards Board (NOSB) are giving to this important recommendation. IFOAM also thanks the National Organic Program (NOP) for allowing the use of the 2002 NOSB recommendation on grower group certification as guidance for the certification of grower groups under the NOP.

These comments address both the Appendix and the questions posed by the CACC.

The guidance provided in the Appendix by the CACC greatly improves the understanding of how to implement appropriate and rigorous controls within operations with multiple production units, sites and facilities. There is much in the Appendix that IFOAM supports:

- Section II: the Prerequisites for a Multi-Site Operation seeking USDA Organic Certification,
- Section III: Organizing the Multi-Site Operation especially the criteria for clustering of 'members' or 'sub-units' into a production unit including the guidance that an upper limit on the number of subunits included in a given production unit should be based on the feasibility of effective oversight by management personnel and factors such as size and accessibility of the subunits, and
- Section IV, D: the Role of the Internal Control System (ICS).

IFOAM does not agree with the key premise that there is a distinction between initial and renewal inspections of production units, facilities and sites presented in Section IV, Inspecting the Multi-Site Operation. Although the language in Section 205.403 of the NOP Rule appears to distinguish between the initial and subsequent on-site inspections, IFOAM does not believe that it was the intent of this provision to suggest that

subsequent on-site inspections might be less complete than the initial one. To make this distinction between initial and renewal inspections would diminish the rigor of the certification system for multi-site operations.

IFOAM recommends that NOP Accredited Certifying Agents perform:

- Annual audits of the ICS of the group,
- Annual inspections of each production unit of the group that includes a sampling of members or sub-units based on both risk assessment and random selection, and
- Annual inspections of handling facilities and sites of the group and production units by NOP accredited certifying agents.

ICS personnel must directly observe and check all sub-units at least annually to ensure that the Organic System Plan is implemented.

The criteria written in Section C. Inspection: Sampling and Risk Analysis should be written to reflect factors appropriate to members or sub-units rather than production units. IFOAM does support the CACC recommendation and reasoning for random sampling but would apply this to members or sub-units rather than production units.

IFOAM applauds the CACC for their excellent work on the role of the Internal Control System in particular the statement: “For the person seeking organic certification to be in compliance with the NOP, all non-compliances detected at the production unit, site, or facility or at the sub-unit or member level are required to be reported to the certifier (not just the ICS) per 205.400 (f)” and their recommendations on addressing potential conflicts of interest.

Although IFOAM fully agrees that training is a key component for the success of a multi-site operation, the integrity of the ICS and the implementation of the Organic System Plan (OSP), the suggestion that training conducted by external specialists be done at least once a year is overly-demanding. IFOAM would recommend that all ICS personnel and group member training receive training from an external specialist every 3-5 years or more often if necessary and required by the accredited certifying agent as part of a sanction imposed or as a corrective action.

Consistent and continuous training of the accredited certifying agents and their inspectors in the evaluation of Internal Control Systems including ISO-compliant risk assessment and random sampling methodologies is critical to ensure that the ICS is functional and certifier inspection is rigorous.

IFOAM supports the CACC suggestion that an implementation period of 36 months from publication of the final NOP guidance on multi-site operations be allowed to give multi-site operations time to organize into production units and to institute internal controls according to the guidance. The implementation period will also allow time for 100% inspection of every production unit and handling site or facility.

The certification systems for multi-site operations developed over the past 15 years are continuously reviewed and revised to ensure compliance to organic and other standards set by governments and the private sector. The group certification system within IFOAM is also evolving from the need to devise a system of control and certification of small farmer groups towards a system of combined internal and external control for operations organized collectively. IFOAM does not exclude large farming units, processing units and traders from participation in a multi-site operation but requires that they be individual production units and subject to annual inspections by the accredited certifying agent.

Further work on specific certification criteria for multi-site operations comprised of only large farming units, processing units or traders is needed. The International Accreditation Forum (IAF) [Guidance on the Application of ISO/IEC Guide 62, Annex 3: Multi-site Certification and Registration](#) may be a useful resource to develop an appropriate certification system for these types of operations.

IFOAM urges you to recognize that multi-site operations are not simply a collection of individual farms that are collaborating to market crops or are organized to avoid rigorous certification oversight and verification. The system for certification of multi-site operations that includes having a functional internal quality assurance system together with an annual inspection and evaluation by an accredited certifying agent offers a sound



INTERNATIONAL FEDERATION OF ORGANIC AGRICULTURE MOVEMENTS

and robust organic guarantee system that protects organic integrity. This system offers two levels of control as opposed to one. It also encourages group organization, which enhances the overall capacity of individual members within the group to institute and further develop good organic management practices. The continuation of multi-site operations is critical to the organic community worldwide.

Thank you for the opportunity to comment.