



NOFA-NY Certified Organic, LLC

834 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax 607-724-9853

certifiedorganic@nofany.org • www.nofany.org

IMPORTANT NOTICE

Date: June 10, 2020

To: NOFA-NY Certified Organic Farms and Operations

From: NOFA-NY Certified Organic, LLC

RE: UPDATE Status of Inspections during COVID-19 and On-Site Inspection Safety Plan

The temporary halt to physical on-site inspections is currently lifted in most areas. NOFA-NY is proceeding with on-site inspections following a NYS required safety plan to protect the health of our inspectors, certified operations, and communities while ensuring compliance with the USDA organic regulations. However, note that on-site inspections could at any time be halted again in the event of a second wave of COVID or as mandated. Alternative inspections such as virtual inspections and records audits will continued to be offered through the remainder of the 2020 season based on inspector/operation preferences as well as risk assessments. Please refer to previous notices for details.

This notice is to inform you of new safety protocols required for on-site inspections.

On-Site Inspections

Inspections will minimize COVID-19 risk by following a required safety plan, limiting the on-site time, and may use virtual methods when possible for segments of the inspection (interview, Organic System Plan & recordkeeping review, audits, etc.). The inspector will work with you to determine approach and technology best suited for your operation. Please work with your inspector to limit on-site time to only what is essential, working virtually or remotely on elements of the inspection that do not require on-site presence. If the inspector is unable to verify essential compliance points during any inspection, a follow up inspection may be required.

For us to continue to serve you and the follow requirements per NYS, all operations must be fully cooperative with the following safety precautions during the on-site portion of inspections during the COVID-19 pandemic:

- All participants must be healthy with no respiratory symptoms in the past two weeks.
- Always observe social distancing requirements of at least six feet distance and no direct human contact.
- Wear face masks/coverings for the duration of the inspection.
- Wash hands and sanitize regularly.
- Minimize the number of people involved in the on-site portion of the inspection.
- Schedule the inspection at a time when there is low worker density on-site.
- Assist inspectors as needed so they can avoid touching anything on-site.
- Provide access to all areas, some of which may be inspected by the inspector alone.
- Cooperate and coordinate with the inspector to provide remote access to key staff, documents, and other resources needed to verify organic compliance.
- Where WHO, CDC, regional, state, or local guidelines require more strict precautions, those must be followed and communicated to the inspector in advance.
- Agree to terms discussed in the safety checklist.

Your inspector will review the attached safety plan and checklist with you prior to scheduling the inspection. Please clearly communicate with your inspector any extra precautions you would like taken so this can be noted in the safety checklist.

Continued

Please distribute this notice, safety plan, and checklist to everyone involved in the on-site portion of your inspection. It is critical that both parties adhere to the protocols discussed in these materials. If either party finds that the other party is not honoring protocols discussed, this should be communicated directly. If the problem persists, either party has the ability to end the inspection at any time and notify NOFA-NY of the problem. Inspectors who do not follow the protocols will have their work reassigned. Operations who refuse to follow the same protocols will be seen as having refused the inspection, and this may result in a Notice of Noncompliance. Operations who refuse to follow protocols will be responsible for all costs of an incomplete inspection, as well as any follow up inspections required to verify compliance with the organic regulations.

Whether the inspection occurs on-site or virtually/remotely, it is critical that the operation is responsive to inspector communications and requests for scheduling, paperwork, and other details. Failure to respond to an inspection scheduling request may delay certification and/or result in a Notice of Noncompliance.

As always, we appreciate your cooperation with NOFA-NY during your inspection, and we appreciate all your efforts to work with your inspector. Thank you for your understanding as we create the safest space possible to continue to certify your operation to the organic standards.

If you have any questions or concerns, please contact the certification office.
Thank you for your patience during this time!

Documentation That May Be Requested Prior To Inspection

Send as legible photos/PDFs/copies by mail, email or text, as applicable

• Farms

- ✓ Soil Tests
- ✓ Receipts for Seeds, Planting Stock, Transplants/Seedlings, Potting mixes, Inputs
- ✓ Organic Certificates for Transplants/Seedlings
- ✓ Seed Tags
- ✓ Seed Search documentation for seeds/planting stock
- ✓ Applied Amendment/Spray Record
- ✓ Harvest Log
- ✓ Organic Certificates and Receipts for Feed and Bedding
- ✓ Purchased Feed Log
- ✓ Livestock Purchase Records and Organic Certificates
- ✓ Feed Ration/DMI Forms
- ✓ Grazing Records – Dates and Fields
- ✓ Health Care Receipts
- ✓ Vet Receipts
- ✓ Livestock Medication/Health Care Record
- ✓ Organic Slaughter Sales Records
- ✓ Boarding Documents
- ✓ Temporary Confinement Records

• Handling Facilities

- ✓ Pest Control Logs & List of Approved Products by Pest Control Company
- ✓ SSOPs
- ✓ Current Master Supplier List
- ✓ Current Organic Certificates
- ✓ Latest Process Flow
- ✓ Latest SOPs (Tracking, Organic, Storage, etc.)
- ✓ Last Mock Recall (To Assist In Mass Balance and Traceback During Actual Audit)
- ✓ Import/Export Documents



NOFA-NY Certified Organic, LLC

834 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax 607-724-9853

certifiedorganic@nofany.org • www.nofany.org

NOFA-NY On-site Inspection Safety Plan

Overview

New York State has announced a phased reopening of the economy. Regions as identified per [NY Forward website](#) that have met all [7 metrics](#) may have an on-site inspection as long as a plan is in place following NY and CDC guidelines for reopening. [NY Regional Breakdown Map](#) – check to see which counties fall under the regional councils.

NOFA-NY has received confirmation from the NYS Assembly, NYS Ag & Markets and Broome County Executive office that it is eligible to reopen and considered Support Activities for Crop and Animal Production under the category of Agriculture, Forestry, Fishing, Hunting, as part of the Phase 1 Reopening plan. The NOFA-NY Office will remain work from home at this time, however with the following precautions will resume its on-site inspection program. Inspectors must have this safety plan with them during each on-site inspection.

Safety Plan

NOFA-NY On-site Inspection Safety Plan must be provided to operator and be readily available by the inspector. Virtual Inspections will continue to be offered through the end of 2020 based on operator/inspector comfort level, operation risk in terms of meeting safety protocols below, and whether the operation in the region has met NYS metrics for reopening. Inspections in regions where metrics have NOT been met should remain virtual or be put on hold.

If an on-site inspection will occur, the inspector will complete the On-Site Inspection Safety Checklist and obtain approval from operator to conduct on-site inspection. All production areas including indoors must be verified. If an inspector or operator is not comfortable entering an indoor production area, then a virtual inspection of those areas should be performed.

- **Materials needed to safely conduct on-site inspections:**

- Face masks (required to be worn by both inspector and operator)
- Gloves
- Hand sanitizer
- Sanitizing wipes to clean surfaces
- Extra sanitized pens
- Shoe coverings (optional)

- **Precautions to consider before going on inspection:**

- Inspector and operator should discuss all necessary precautions and considerations prior to the on-site inspection per the On-Site Inspection Safety Checklist.
- Scheduling:
 - Schedule the inspection at a time when there is low worker density on-site.
 - If inspection will include indoor production areas, it should be conducted when the fewest employees are present if possible, with one person guiding following all safety and distance protocols.



NOFA-NY Certified Organic, LLC

834 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax 607-724-9853

certifiedorganic@nofany.org • www.nofany.org

- Cooperate and coordinate with the inspector to provide remote access to key staff, documents, and other resources needed to verify organic compliance.
- It is strongly recommended that inspectors get tested for COVID-19 on a regular basis. Check local county health department for information on free testing sites. Results should be provided to NOFA-NY. If an inspector tests positive for COVID-19, on-site inspections must not be conducted by inspector until at least two weeks after testing and NOFA-NY must notify state and local health officials.
- If operator or their employees have tested positive for COVID-19, inspector should be notified, and the on-site inspection should be considered for virtual inspection if possible. For those who do not have the capabilities to do a virtual inspection, inspection may be rescheduled once operator/employee(s) are healthy and confirmed tested negative for COVID-19.
- Avoid using public transportation where possible.
- Refrain from visiting if inspector or operator has travelled to a COVID-19 hotspot (domestic or international).
- The inspector and operator should check their temperature the morning of inspection to confirm they do not have a fever.
- If inspector or operator have any COVID-19 or flulike symptoms, refrain from conducting on-site inspection. All participants must be healthy with no respiratory symptoms in the past two weeks.
- Wash hands and sanitize phones and other personal equipment before commencing inspection.
- Where WHO, CDC, regional, state, or local guidelines require more strict precautions, those must be followed and communicated to the inspector in advance.
- **During Inspection**
 - Inspector and operator required to wear face mask/covering for duration of inspection.
 - Physical Distancing
 - Inspector and operator should be a minimum of 6 feet apart for duration of inspection and no direct human contact.
 - When driving to fields, operators should follow in separate vehicle if possible.
 - Carry hand sanitizer and/or handwipes during the inspection and use as needed.
 - Minimize the number of people involved in the on-site portion of the inspection.
 - Assist inspectors as needed so they can avoid touching anything on-site.
 - Provide access to all areas, some of which may be inspected by the inspector alone.
 - Records audit during the inspection should be conducted outside if possible. Records may be required to be submitted ahead of time.
 - Limit the sharing of objects and discourage touching of shared surfaces; or, when in contact with shared objects or frequently touched areas, wear gloves or sanitize or wash hands before and after contact. Common objects that are shared include:
 - Pens
 - Paperwork
 - Animal/crop inputs and materials
 - Restrooms



NOFA-NY Certified Organic, LLC

834 Upper Front Street • Binghamton, New York 13905

Phone 607-724-9851 • Fax 607-724-9853

certifiedorganic@nofany.org • www.nofany.org

On-site Inspection Safety Checklist

Operation Name: [REDACTED]	Contact Name: [REDACTED]
Inspector Name: [REDACTED]	Scheduled Date: [REDACTED]
Date paperwork due: [REDACTED]	Scheduled Time: [REDACTED]

Pre-Inspection Preparation

Inspectors will initiate contact to prepare for an on-site inspection following safety and distancing protocols. This initial meeting should be done by phone but can be done by email or regular mail if necessary. Use this checklist to ensure safety precautions are taken by both parties at the time of inspection, as well as discuss any documentation required to be submitted prior to inspection. If during this initial preparation the inspector and/or operator determines that an on-site inspection cannot be safely conducted, the inspector should discuss other options such as virtual inspection or putting inspection on hold until later in the year. Any changes, [other than switching to an on-site inspection] to the original type of inspection should be discussed with the office for approval.

<p>1. Appropriate protective materials discussed and obtained?</p> <ul style="list-style-type: none"> • Face Masks (required by inspector and operator) • Hand Sanitizer • Sanitizing Wipes • Gloves/Shoe coverings (optional) 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>2. Confirm both operator and inspector reside in an area that has met all 7 NYS metrics for reopening and that neither party has recently traveled to a COVID-19 hotspot, domestic or international. Both parties should address any other travel concerns.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>3. Both parties agree to taking their temperature the morning before the inspection and canceling the inspection if either party is experiencing fever or any of the COVID-19 symptoms. Cancellation fees will not apply to this circumstance.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>4. Discuss safety precautions, expectations, and both inspector and operator comfort levels that will be taken into account at the time of inspection:</p> <ul style="list-style-type: none"> • Face masks/coverings required by inspector and operator. • Wash hands and sanitize phones and other devices prior to inspection. • Maintain minimum of 6 feet apart during inspection. • Carry hand sanitizer/wipes during the inspection. • Limit sharing of objects such as pens – sanitize in between if needed. • Input materials should all be pulled out clearly in view prior to the inspection. • When driving to fields, both parties should use separate vehicles. If unable, wear masks in the same vehicle. 	<p><input type="checkbox"/> Completed</p> <p>Comments: [REDACTED]</p>

<ul style="list-style-type: none"> • When entering an indoor production area, should be at a time when fewest employees are present with one person only guiding. If either party not comfortable entering indoor areas, a virtual inspection of those areas must occur either during on-site portion of inspection or prior to/after. • Address additional precautions requested by either party. 	
<p>5. Discuss how the records audit will be performed.</p> <ul style="list-style-type: none"> • Records may be required to be submitted via email or mail prior to inspection. • If records are not submitted by due date/time, cancelation fees may apply. • NOTE: inspectors should perform on-site records audit outdoors only if possible. 	<input type="checkbox"/> Completed, describe agreed upon audit : <div style="background-color: gray; width: 50px; height: 15px; margin: 5px 0;"></div> <input type="checkbox"/> N/A
<p>6. Discuss preparation, any items to send prior to inspection, and if any questions. Provide operator with copy of the On-Site Inspections Safety Plan.</p>	<input type="checkbox"/> Completed
<p>7. Operator agrees to on-site inspection following all safety and distancing protocols as discussed.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

Special Notes or information about the inspection:

Necessary Documents

The recordkeeping system as described in your Organic System Plan must be available during your inspection.

The inspector may request much of this prior to the on-site inspection. These may be sent as legible photos/PDFs by email or text, as applicable. Please use the below list to prepare for the on-site inspection. Not all documents may be applicable.

Farms

- Soil Tests
- Receipts for Seeds, Planting Stock, Transplants/Seedlings, Potting mixes
- Organic Certificates for Transplants/Seedlings
- Seed Tags
- Seed Search documentation for seeds/planting stock
- Planting Records
- Applied Amendment/Spray Record
- Receipts for Inputs (fertility and pest control)
- Harvest Log
- Crop Sales Records
- Organic Certificates and Receipts for Feed and Bedding
- Purchased Feed Log
- Livestock Purchase Records and Organic Certificates
- Feed Ration/DMI Forms
- Grazing Records – Dates and Fields
- Health Care Receipts
- Vet Receipts
- Livestock Medication/Health Care Record
- Boarding Documents
- Temporary Confinement Records
- Organic Slaughter Sales Records
- Milk check stubs/production records
- Commodity sales statements and weigh slips

Handling Facilities

- Pest Control Logs & List of Approved Pest Materials used by operator/Pest Control Company
- SSOPs
- Approved Sanitation Chemical List
- Current Master Supplier List
- Current Organic Certificates
- Latest Process Flow
- Latest SOPs (Traceability, Identity Preserved, Organic, Storage, etc.)
- Last Mock Recall (To Assist In Mass Balance and Traceback During Actual Audit)
- Import/Export Documents