



NOFA-NY Certified Organic, LLC

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2021 Inspections & COVID-19

Date: October 2020

To: NOFA-NY New Applicants

NOFA-NY is currently planning to perform on-site inspections for the 2021 season; continuing to follow any NYS required safety protocols 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 be halted if additional COVID concerns arise or as mandated, and procedures are subject to change.

As a new applicant seeking certification, an on-site inspection is required. Currently, you have the following options: (1) full on-site inspection following distance and safety protocols; (2) hybrid inspection including robust virtual inspection with a brief and physically distanced on-site inspection; or (3) hold off on inspection if safety concerns exist. Please confirm your preference with your application. See below for more details.

On-Site Inspections

On-site inspections will minimize COVID-19 risk by following a required safety plan. For us to best serve you and follow requirements per NYS, all operations must be fully cooperative with the following safety precautions during the on-site portion of inspections:

- All participants must be healthy with no respiratory/COVID-19 symptoms in the past two weeks.
- 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.
- 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 things on-site.
- Provide access to all areas, some of which may need to 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.

Your inspector will review the safety plan with you prior to scheduling the inspection. Please clearly communicate with your inspector any extra precautions or concerns. It is critical that all parties adhere to the protocols. *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.*

Hybrid Inspections

Hybrid inspections are primarily performed virtually with a brief and physically distanced on-site portion following safety protocols to verify compliance. Note the following:

- Virtual inspections flow exactly as an on-site inspection, just through a camera lens. The inspector may request where the camera should point to ensure their views are not obstructed and to verify full compliance.
- Technology requirements include a mobile smart device with video capability, such as phone or tablet. Inspection will occur with visual software such as Zoom or GoToMeeting. Instructions will be provided.

- Geographic location should have satellite signal/internet access outside of Wifi range for viewing of facilities, farmstead, fields, barns, etc.
- Audit trail documents will be requested by inspector prior to date of inspection. See below.
- On-site portion of the inspection must adhere to safety plan.
- If operation includes outside areas (farms, fields, wooded areas, etc.), on-site inspection will confirm land activities, outside production areas, buffer zones, operator interview, etc. as applicable.
- If operation is indoors (handling facility, sprout/microgreen production, greenhouse, etc.), on-site inspection will include brief tour of facility at a time with fewest employees on-site with one guide following all safety and distance protocols, as agreed upon.
- Documentation that may be requested prior to inspection (*send as legible photos/PDFs by email or text*):

Farms

- ✓ 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

We appreciate your efforts to work with the inspector. Thank you for your understanding as we create the safest space possible to certify your operation to the organic standards. If you have any questions or concerns, please contact the certification office.

Thank you!