

OCIA Integrity Visit Guidelines

1.0 PURPOSE: To identify production situations where an integrity visit is required, explain who conducts an integrity visit, when and how integrity visits are conducted, and the proper manner of documenting this visit.

2.0 SCOPE: This procedure will affect producers growing organic and non-organic forms of the same crop which are *not* visually distinguishable, Chapter Administrators and Certification Committees, and OCIA International staff.

3.0 DEFINITIONS

3.1 CDT: The Certification Decision Team responsible for all final decisions on certification applicants.

3.2 Integrity Inspector: Chapter member, OCIA staff, or other authorized representatives of OCIA International who conduct integrity visits.

3.3 Integrity Visit: An inspection that takes place during critical times of the production cycle. This inspection would be in addition to the annual inspection.

3.4 Non-Organic: Conventional, transitional or in-conversion crops, or crops that are otherwise ineligible for organic certification in the current growing cycle.

3.5 Organic: Crops that are eligible for or have attained organic certification.

3.6 Parallel Production: Organic and non-organic forms of the same crop being produced on a farm.

4.0 WHO REQUIRES AN INTEGRITY VISIT?

An integrity visit is required when a producer *requesting certification from OCIA International* plants fields of organic and non-organic forms of the same crop which are *not visually distinguishable* (i.e. organic and non-organic forms of clear hilum soybeans). As buffers are not entire fields intentionally planted to non-organic crops, organic fields with buffer zones of the same crop do not in themselves constitute the need for an integrity visit. If a crop will not be sold or represented as OCIA-certified-organic, then parallel production does not exist and an Integrity Visit is not needed. The operator should withdraw their request for certification for the applicable crop, so that storage/commingling etc are not an issue. As long as the fields are managed organically, it is not considered to be moving fields in and out of organic management.

5.0 WHO CONDUCTS INTEGRITY VISITS

5.1 Chapters - If a Chapter member requires an integrity visit, the Chapter shall assign an integrity inspector. The Chapter member has a right to reject the integrity inspector assigned by the Chapter. Integrity inspectors must be qualified individuals and should be Chapter Certification Committee members, if possible. If the Chapter does not have a Certification Committee, a person specifically designated by the Chapter to conduct integrity visits may be assigned. If it is not possible for Chapter Certification Committee member or integrity inspector to do integrity visits, they may be referenced to OCIA International.

5.1.1 Integrity inspectors must understand the integrity visit procedure and sign confidentiality and conflict of interest forms. Under no circumstances may an integrity inspector perform a visit on a producer with whom they have a conflict of interest.

5.2 International Office- If a Member-At-Large requires an integrity visit, the International Office shall assign an integrity inspector. Member(s)-At-Large may reject the integrity inspector assigned by the International Office, however another integrity inspector shall be assigned.

6.0 HOW TO IDENTIFY AND DOCUMENT THE NEED FOR INTEGRITY VISITS

There are two points where the need for an integrity visit may be identified and documented: Pre-Inspection Reviews and Inspection Reports.

6.1 Pre-Inspection Review: When possible, the need for an integrity visit will be identified through *Pre-Inspection Review*. If pre-inspection review reveals the possible need for an integrity visit, the Chapter Administrator or International Certification Coordinator should contact the member to verify that visually indistinguishable forms of the same crop are being produced organically and non-organically.

6.1.1 If the producer confirms that parallel production that is *not visually distinguishable* is taking place, this should be noted in the Pre-Inspection Review form, and the Integrity Visit Procedure should proceed as outlined in the sections below.

6.1.2 If consultation with the producer indicates that an integrity visit is not required, this should be noted in the Pre-Inspection Review paperwork and the file should be processed following normal certification procedures.

6.2 Inspection Reports: If the need for integrity visits were not previously identified in the pre-inspection review process, Chapter Certification Committees and Certification Specialists should review farm inspection reports to see if the inspector indicated that parallel production exists that is not visually distinguishable. The need for an integrity visit should be documented one of the following places, as applicable:

6.2.1 Certification Decision Form: If a Chapter Certification Committee reviews post-inspection files, the need for an integrity visit should be noted.

6.2.2 CDT Checklist: Certification files not reviewed by Chapter Certification Committees will have the need for integrity visits denoted in the CDT checklist when the file is reviewed by the CDT.

Note: If the need for an integrity visit is identified when the inspection report is received, the file should be processed as normal, but the member and chapter should be notified immediately to ensure that an integrity visit can be conducted during critical production periods as outlined below.

7.0 WHEN TO CONDUCT AN INTEGRITY VISIT

Integrity visits must be conducted at critical times. Critical times may be during input (fertilizer, pest & disease control products, etc.) application, harvest, transport, storage, or on-farm processing of organic crops. One inspection or an integrity visit must occur during harvest and/or on-farm processing of the crops in parallel production. Integrity visits must be conducted at least once in all cases of parallel production.

8.0 HOW TO CONDUCT AN INTEGRITY VISIT

The main goal of integrity visits is to ensure that the integrity of organic crops is being or has been maintained throughout all stages of production until their sale as organic. The *Integrity Visit Checklist* lists out all these stages and asks specific questions about how organic integrity is being maintained by the producer. Other inspection report or checklist formats may be used as long as they address the content of the *Integrity Visit Checklist*. If one integrity visit takes place during or prior to harvest, the integrity inspector MUST visit non-organic fields of the crop in parallel production. The goal is to identify any production or paperwork issues that may threaten organic integrity of the organic form of the crop.

9.0 INTEGRITY VISIT FOLLOW-UP

- 9.1 When the integrity visit has been completed, the *Integrity Visit Checklist* should be submitted to the Chapter Administrator or International Certification Coordinator responsible for arranging the Integrity Visit. The *Integrity Visit Checklist* should then be immediately forwarded to the Chapter Certification Committee (if applicable) and then to Certification Decision Team for review.
- 9.2 If no risks to organic integrity or other major noncompliances are identified the member will be notified. No requirements or recommendations will be levied.
- 9.3 If risks to organic integrity or other major noncompliances are identified, the file will be processed according to annual certification review procedures.