



United States  
Department of  
Agriculture

Agricultural  
Marketing  
Service

STOP 0201 – Room 3071-S  
1400 Independence Avenue, SW.  
Washington, D.C. 20250-0201

TO: USDA Certifying Agents March 5, 2008

FROM: Barbara C. Robinson  
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Mark Bradley  
Chief, Audit, Accreditation & Training Branch

SUBJECT: Verification of Materials

It has been the policy of the National Organic Program (NOP) that each certifying agent is responsible for conducting their own reviews of inputs for agricultural production, such as formulated pesticides and soil amendments. With a little more than five years of experience to draw on, we have seen a variety of challenges this policy has presented to the growth of the industry. Therefore the NOP is amending this policy to allow certifying agents to recognize reviews conducted by other certifying agents and competent third-party reviewers.

All accredited certifying agents (ACAs) must continue to verify, along with their clients, that materials used by certified organic operations, comply with the National Organic Program (NOP) regulations, 7 CFR 205. Specifically, all materials must comply with the National List, and any annotations provided. For branded (formulated) products, ACAs have three options available for determining compliance:

- 1) ACAs can verify the material complies by performing the due diligence themselves (e.g., contacting the manufacturer to obtain disclosure of the contents of the product);
- 2) ACAs may consult with another ACA who has performed the due diligence and accept that ACA's determination on material compliance with the NOP regulations;  
or
- 3) ACAs may consult with a reputable third party source, (e.g., the Environmental Protection Agency (EPA), the Organic Materials Review Institute (OMRI)), that performs the due diligence on material review and accept the resulting determination from that source on compliance with the NOP regulations.

In all cases, documentation must accompany the resulting determination. These procedures are effective immediately and will be added to ACAs' accreditation procedures for renewal and will be part of annual audit updates. Guidance will be forthcoming for assistance in choosing a reputable, third party source for materials review.

cc: James Riva, Chief  
Audit, Review, & Compliance Branch  
Livestock & Seed Programs