



Types of Organic Inspections

Inspection is one of the parts of certification newer handlers most want to understand. With experience, many handlers build organic compliance and recordkeeping into their company's culture, so inspections become a routine part of operations. This article explains the kinds of inspections that you can expect as an organic handler. With this big picture preparation, you'll be empowered to remain "always ready" for any organic compliance check.



What You'll Learn

- How to identify the types of organic inspections
- How an initial inspection differs from an annual inspection
- The difference between a full annual inspection and a limited-scope spot inspection
- Why a certifier might require a follow-up inspection

The organic regulations require rigorous, ongoing oversight from certifiers, extending well beyond the yearly inspection most handlers are familiar with. In fact, the regulations provide for several distinct types of inspections to verify compliance. Depending on where you are in the certification process, changes made to your facility, or risks identified within your supply chain, you may undergo any of these inspection types over the course of your certification.

INITIAL INSPECTION

Your organic certificate is earned by successfully completing the certification process, which includes an initial on-site inspection conducted by your accredited certifier at each facility and site where you'll handle organic products.¹ This inspection verifies that your operation has the capacity and systems in place to implement your proposed Organic System Plan (OSP) as written, similar in function to a food safety audit assessing readiness against a documented program. For most handlers, this is their first exposure specifically to the organic audit process, even if they're experienced with other compliance frameworks. Expect it to function much like a gap assessment: the inspector identifies areas needing adjustment, and you implement corrective actions based on that feedback as part of earning certification.

"Even though we are audited once a year through our organic certifier, we are expected to be compliant with organic standards 365 days a year. So our goal is to make sure that we're always in compliance."

Abel Sanchez

Product Innovation Manager

Tradin Organic

Because this is the first organic inspection and no organic products have been sold yet, the inspector may need to modify how they conduct the traceback audit portion of the inspection. A traceback follows a finished product from sale, back through all handling and processing activities, to the original source of the ingredients. At your first inspection, there are no organic products to trace, so the inspector may audit your recordkeeping system to verify it is sufficient, or if you already have nonorganic product sales, they may use those records as a test of your recordkeeping system.

ANNUAL ON-SITE INSPECTION

After achieving certification, you are required to undergo an on-site inspection at least once per calendar year to maintain certification.¹ Your annual inspections are typically scheduled ahead of time. This allows you to make sure that key personnel are available at the inspection, such as your Plant Manager or Quality Assurance Director.

The annual inspection is a full review of your compliance with the USDA organic regulations. The inspector will tour your facility, review updates made to your OSP over the past year, verify day-to-day compliance on the production floor, and execute rigorous mass-balance and traceback audits.²

The annual inspection confirms that your OSP aligns with what is happening on-site, by reviewing and auditing your records and noting changes you've made since you submitted your last plan.

LEARN MORE

Visit these articles for more details on preparing for [The Traceback Audit](#) and [The Mass-Balance Audit](#).

UNANNOUNCED INSPECTIONS

To deter fraud and verify that operations are following the rules every day, the USDA organic regulations require certifiers to conduct unannounced inspections on a minimum of 5% of their certified operations annually.³ Certifiers can choose operations for unannounced inspections randomly or based on risk, and they may be performed either remotely or on-site.

Unannounced inspections typically are... not announced. You will not receive prior notification of the inspector's arrival. They will just show up. But there is a narrow exception: certifiers may notify an operation up to four hours prior to arrival in cases of extenuating circumstances, such as strict biosecurity protocols.

Unannounced inspections may be broad in scope to verify ongoing compliance, or they may be targeted to respond to complaints, follow up on earlier noncompliance, or investigate contamination concerns. Inspectors may arrive unannounced specifically to collect samples of organic products to test them for prohibited materials.⁴

WATCH OUT

Participation in an unannounced inspection is required! Refusal to cooperate with an unannounced organic inspection can result in a [Noncompliance or Adverse Action](#), which could eventually result in the loss of your organic certification.

ADDITIONAL INSPECTIONS

Certifiers are permitted to conduct additional inspections when they deem it is necessary to determine compliance with the USDA organic regulations. These additional inspections may be announced or unannounced, depending on the certifier's purpose for conducting them.⁵

These additional inspections are often more limited in scope than the annual or unannounced inspections. Rather than looking at the handler's entire OSP, they may focus on one targeted issue, or facility, or product. Because of their narrower scope, some certifiers may call these "spot inspections".

Common reasons for additional inspections:

- Follow up with any concerns identified in your annual inspection,
- Inspect your fixes to any past noncompliance issues,
- Verify a major change you've made to your operation since your last inspection (such as adding a new production line),
- An expedited service request,
- Investigate complaints or high-risk situations.

NATIONAL ORGANIC PROGRAM (NOP) AND STATE PROGRAM INSPECTIONS

Most inspections occur at the discretion of your certifier, but other levels of oversight carry independent inspection authority. The NOP accredits certifying agents and retains its own authority to require additional inspections when specific concerns arise.⁵ State organic programs hold a separate role: rather than acting as your certifier, they exercise their own statutory oversight authority within their state and can likewise require additional inspections. This layered structure, in which the NOP Administrator, accredited certifier, and state organic program each hold distinct authority, can sometimes add complexity, but it strengthens organic integrity by verifying compliance from multiple angles.

CONCLUSION

Inspections function as a routine, integral component of the organic certification system rather than a separate or unexpected event. Whether conducted through your scheduled annual review or an unannounced site visit, each inspection offers an opportunity to demonstrate the standards your operation already upholds such as sound sanitation practices, accurate recordkeeping, and a genuine commitment to organic integrity. Handlers who succeed under organic oversight maintain these standards as a consistent part of daily operations, which naturally prepares them for inspection at any time. A thorough understanding of your OSP, current recordkeeping, and proactive communication with your certifier will position you to approach any inspection, announced or unannounced, with confidence.



ACTION ITEMS

- Ask yourself how well you would be prepared if an inspection happened today. Which processes, records, or inputs would an inspector be most likely to scrutinize?
- Analyze your operation, process, and inputs to determine what aspects could appear high-risk to an inspector and may be likely to trigger an additional inspection.
- Build your company's culture and mindset towards continual organic compliance.

SOURCES CITED

1. USDA National Organic Program, [7 CFR §205.403\(a\)](#).
2. USDA National Organic Program, [7 CFR §205.403\(d\)](#).
3. USDA National Organic Program, [7 CFR §205.403\(b\)\(1\)](#).
4. U.S. Department of Agriculture, Agricultural Marketing Service. (2024, March 20). *Unannounced Inspections*. Retrieved from <https://www.ams.usda.gov/sites/default/files/media/2609.pdf>
5. USDA National Organic Program, [7 CFR §205.403\(a\)\(3\)](#).

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1. Oregon Tilth. (2025, August 5). *Understanding Organic Inspections*. Retrieved from <https://tilth.org/help-center/understanding-organic-inspections/>



United States Department of Agriculture
Agricultural Marketing Service
National Organic Program

